

Offsetting Plan Community Notice and Validation Letters

February 2024

ΔL^cΠΔ^εΓ Ρ^εΥ^εΔ^cσ^cΨ^c <^cΩ▷^cΠ^c

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ငါ့အဖေ နဲ့ အမိတို့က

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Δεξιόβωβος Λαοαλζός

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M. J. G. J.

$\dot{\gamma} \wedge \cap J^c \subset U^{qb}$

$\Delta^{\alpha} \Gamma^{\beta} \dot{b}^{\gamma} \triangleright \rho \triangleright^{\beta} C^{\beta} \rhd C \cap \sigma^{\gamma} J^{\epsilon}$

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◀^cCC^{fb}NP_L↗^c

[illegible]

၎င်းတို့သည် အောက်ဖော်ပြပါအတိုင်း ဖြစ်ပေါ်ခဲ့ခြင်းဖြစ်ကြောင်း တွေ့ရှိရပါသည်။

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January 31, 2024

Mayor Olayuk Naqitarvik
Hamlet of Arctic Bay
P.O. Box 78
Arctic Bay, Nunavut
X0A 0A0

Mr. Joeli Qamanirq
Chairperson
Ikajutit Hunters and Trappers Organization
P.O. Box 39
Arctic Bay, Nunavut
X0A 0A0

RE: MARY RIVER PROJECT– STEENSBY FISHERIES OFFSETTING PLANS NOTICE

Dear Mayor and Chairperson,

I am reaching out to share additional information that Baffinland Iron Mines Corporation (Baffinland) has gathered following our meetings in late 2023 regarding permitting of the Steensby Component of the Mary River Project. The Steensby Component is the original Project approved by the Nunavut Impact Review Board (NIRB) in 2012, consisting of a 149km railway that will connect the mine to Steensby Port.

We are now working on the final designs of the railway and port, and obtaining the remaining permits required to allow construction to proceed. This includes two *Fisheries Act* Authorizations (FAAs) from the Department of Fisheries and Oceans Canada (DFO) to authorize work that will impact fish habitat in freshwater bodies between the Mine Site and Steensby Port, and in the marine area surrounding Steensby Port. Two Authorizations will be required:

- Authorization for construction of the Steensby Railway (freshwater Authorization)
- Authorization for construction of the docks, a causeway connecting Steensby Island to the mainland and the infilling of a tidal pool (marine Authorization)

Each of these authorizations will require Baffinland to “offset” losses of fish habitat, by creating new fish habitat equal to what is removed during construction. An overview of the proposed offset strategies is provided below.

Freshwater Offsetting Plans

The freshwater FAA application looks mostly at crossings over fish bearing streams along the Steensby Railway and at Steensby Port where fish passage must be maintained, but where works under the high water mark may remove fish habitat. The proposed offsetting option involves the introduction of Arctic char into a northern tributary of Cockburn Lake (Δ^bΛP^c▷^d◁^e ◁^fΛ^g), where this species is currently absent, but where overwintering and rearing habitat has been identified (Attachment 1). Arctic char is absent from this larger northern tributary due to the presence of several waterfall barriers connecting this tributary to the north end of Cockburn Lake. Arctic char would be captured from several local waterbodies and transported by helicopter to the non-fish-bearing lakes for release. This would involve working together to identify

sources of fish, fish capture, introduction and monitoring. In addition to increasing anadromous Arctic Char to a new water body, this could also support the fishery in Cockburn Lake, which we understand is harvested occasionally by the communities.

DFO requires proponents to identify contingency offsetting measures in case the preferred option is not successful. Therefore, Baffinland proposes to continue with the originally proposed option we discussed along the Milne Inlet Tote Road (Attachment 2) and also with the project to introduce Arctic char in Cockburn Lake. Attached is a presentation, labeled Attachment 3 – Freshwater Offsetting Plan, which provides more details about the proposed freshwater offsetting measures.

Marine Fisheries Offsetting Plans

The marine FAA application looks at where fish habitat will be replaced by several docks and a causeway in the marine environment around Steensby Port. The most common and effective offsetting opportunity is the construction of a rocky reef offset structure to facilitate the sustained presence of marine species in the Steensby Inlet area. Four potential candidate sites were considered and assessed (Attachment 4). A site located approximately 1km from the proposed Construction Dock was selected for the installation of the rocky reef habitat (Attachment 5).

Attached is a presentation, labeled Attachment 6 – Steensby Port Facility Offsetting Plan, which provides more details about the proposed marine offsetting measures.

Complementary Measures

Complementary measures are investments in data collection and scientific research to maintain or enhance the conservation and protection of fish habitat. Baffinland may include up to 10% of the required amount of offsetting as complementary measures. This could include monitoring of Arctic Char to better understand population and behaviours. Baffinland will support investments in complementary measures to address offsetting requirements with support from community stakeholders and DFO.

Should you have any comments, questions or would like to discuss this topic further, we would be pleased to arrange a meeting at a time that works for you.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Tigullaraq", written over a light blue rectangular background.

Joe Tigullaraq
Head of Northern Affairs

cc. Elisabeth Luther, Senior Manager Regulatory Affairs

Attachments

- Attachment 1 – Preferred Freshwater Offsetting Site (Fish Introduction)
- Attachment 2 – Freshwater Contingency Offsetting Site (Habitat Enhancement)
- Attachment 3 – Freshwater Offsetting Plan Presentation
- Attachment 4 – Marine Candidate Sites Near Steensby Port Evaluated for Rocky Reef Offsetting
- Attachment 5 – Selected Site for Marine Rocky Reef Offset
- Attachment 6 – Steensby Port Facility Offsetting Plan Presentation

ΔΛΕΓΟΜΕΝΟΙΣ ΠΡΟΪΚΤΟΡΕΣ ΚΑΙ ΑΝΤΙΠΡΟΪΚΤΟΡΕΣ

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ငါ့အဖေ့အမည်မှာ ဦးစိုးမင်း ဖြစ်ပါတယ်။

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በበኛኛጋኛ.

M. J. G. J. G. J. G.

$\dot{\gamma} \wedge \cap J^c \subset U^{qb}$

$\Delta^{\alpha} \Gamma_{\beta}^{\gamma} = \partial_{\beta} \Gamma_{\alpha}^{\gamma} - \Gamma_{\alpha}^{\delta} \Gamma_{\beta}^{\epsilon} \Gamma_{\delta}^{\gamma}$

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◀^cCC^{fb}NP_L↯^c

၎င်းတို့၏အချက်အလက်များကို အောက်ဖော်ပြပါအတိုင်း ဖော်ပြထားပါသည်။

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January 31, 2024

Mayor Liemikie Palluq
Hamlet of Clyde River
P.O. Box 89
Clyde River, Nunavut
X0A 0E0

Mr. Apiusie Apak
Chairperson
Nangmautaq Hunters and Trappers Association
P.O. Box 149
Clyde River, Nunavut
X0A 0E0

RE: MARY RIVER PROJECT– STEENSBY FISHERIES OFFSETTING PLANS NOTICE

Dear Mayor and Chairperson,

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Should you have any comments, questions or would like to discuss this topic further, we would be pleased to arrange a meeting at a time that works for you.

Sincerely,

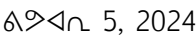
Joe Tigullaraq
Head of Northern Affairs

A handwritten signature in black ink, appearing to read "Tigullaraq", written over a light blue rectangular background.

cc. Elisabeth Luther, Senior Manager Regulatory Affairs

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Muzaleny

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△CC^{9b}PL^{9c}

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၎င်းတို့သည် နယ်လွှာများတွင် အောက်ဖော်ပြပါအတိုင်း ပြောင်းလဲနေကြောင်း တွေ့ရှိရပါသည်။

[illegible]

[illegible]



January 31, 2024

Mayor George Auksaq
Hamlet of Igloolik
P.O. Box 30
Igloolik, Nunavut
X0A 0L0

Mr. Judah Sarpinak
Chairperson
Igloolik Hunters and Trappers Organization
P.O. Box 89
Igloolik, Nunavut
X0A 0L0

RE: MARY RIVER PROJECT– STEENSBY FISHERIES OFFSETTING PLANS VALIDATION

Dear Mayor and Chairperson,

I am reaching out to share additional information that Baffinland Iron Mines Corporation (Baffinland) has gathered following our meetings in late 2023 regarding permitting of the Steensby Component of the Mary River Project. The Steensby Component is the original Project approved by the Nunavut Impact Review Board (NIRB) in 2012, consisting of a 149km railway that will connect the mine to Steensby Port.

We are now working on the final designs of the railway and port, and obtaining the remaining permits required to allow construction to proceed. This includes two *Fisheries Act* Authorizations (FAAs) from the Department of Fisheries and Oceans Canada (DFO) to authorize work that will impact fish habitat in freshwater bodies between the Mine Site and Steensby Port, and in the marine area surrounding Steensby Port. Two Authorizations will be required:

- Authorization for construction of the Steensby Railway (freshwater Authorization)
- Authorization for construction of the docks, a causeway connecting Steensby Island to the mainland and the infilling of a tidal pool (marine Authorization)

Each of these authorizations will require Baffinland to “offset” losses of fish habitat, by creating new fish habitat equal to what is removed during construction. We have previously shared some information about these two applications and proposed offsets. As we integrated the feedback received to date, we are now seeking your input to support the selected offset measures, which are described below.

Freshwater Offsetting Plans

The freshwater FAA application looks mostly at crossings over fish bearing streams along the Steensby Railway and at Steensby Port where fish passage must be maintained, but where works under the high water mark may remove fish habitat. One of the offset options we discussed in 2023 was habitat enhancements in lakes and streams along the Milne Inlet Tote Road. The feedback we received at the time was neutral and likely a result of communities being more interested in offsetting opportunities that can provide a community benefit.

Following our last meetings considered alternative offset options and identified a new opportunity that better satisfies the community acceptability criteria. The proposed offsetting option involves the introduction of Arctic char into a northern tributary of Cockburn Lake (Δ^ΛΛ^ϙ⊔^ϙϙ^Λ ♂^Λ⊔), where this species is currently absent, but where overwintering and rearing habitat has been identified (Attachment 1). Arctic char is absent from this larger northern tributary due to the presence of several waterfall barriers connecting this tributary to the north end of Cockburn Lake. Working with you and your community, Arctic char would be captured from several local waterbodies and transported by helicopter to the non-fish-bearing lakes for release. This would involve working together to identify sources of fish, fish capture, introduction and monitoring. In addition to increasing anadromous Arctic Char to a new water body, this could also support the fishery in Cockburn Lake, which we understand is harvested occasionally by the communities.

DFO requires proponents to identify contingency offsetting measures in case the preferred option is not successful. Therefore, Baffinland proposes to continue with the originally proposed option we discussed along the Milne Inlet Tote Road (Attachment 2) and also with the project to introduce Arctic char in Cockburn Lake. Attached is a presentation, labeled Attachment 3 – Freshwater Offsetting Plan, which provides more details about the proposed freshwater offsetting measures.

Marine Fisheries Offsetting Plans

The marine FAA application looks at where fish habitat will be replaced by several docks and a causeway in the marine environment around Steensby Port. Baffinland has greatly reduced the construction activities that were previously planned for that could have disturbed fish and marine mammals, including open water pile installations and underwater blasting. The installation of marine infrastructure and placement of rock infill in the marine environment cannot be avoided, however, and will result in the removal of fish habitat that requires offsetting.

The most common and effective offsetting opportunity is the construction of a rocky reef offset structure to facilitate the sustained presence of marine species in the Steensby Inlet area. Four potential candidate sites were considered, assessed and discussed with your community in 2023 (Attachment 4). Based on the assessment and engagement, Site 4, located approximately 1km from the proposed Construction Dock, was selected for the installation of the rocky reef habitat (Attachment 5).

Attached is a presentation, labeled Attachment 6 – Steensby Port Facility Offsetting Plan, which provides more details about the proposed marine offsetting measures.

Complementary Measures

Complementary measures are investments in data collection and scientific research to maintain or enhance the conservation and protection of fish habitat. Baffinland may include up to 10% of the required amount of offsetting as complementary measures. This could include monitoring of Arctic Char to better understand population and behaviours. Baffinland will support investments in complementary measures to address offsetting requirements with support from community stakeholders and DFO.

Validation of Offsetting Measures

We welcome your feedback on the selection of offsetting measures, site selection and proposed contingency measures. Should you have any comments, questions or would like to discuss this topic further, we would be pleased to arrange a meeting at a time that works for you.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Tigullaraq", is shown on a light gray rectangular background.

Joe Tigullaraq
Head of Northern Affairs

cc. Elisabeth Luther, Senior Manager Regulatory Affairs

Attachments

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[illegible][illegible][illegible]

ငါတို့ အသံအသွယ်ကို ပျော်ရွှင်စွာ နားထောင်ပါ

[illegible][illegible]

Δελτίο Έκδοσης

[illegible][illegible]

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M. J. G. J.

ᐱᕈᕐ ᑎᓂᕋᕋᕐ

$\Delta^{\alpha} \Gamma^{\beta} \dot{b}^{\gamma} \triangleright \rho \triangleright^{\beta} C^{\beta} \rhd C \cap \sigma^{\gamma} J^{\epsilon}$

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၎င်းတို့သည် အောက်ဖော်ပြပါအတိုင်း ဖြစ်ပေါ်ခဲ့ခြင်းဖြစ်ကြောင်း တွေ့ရှိရပါသည်။

[illegible]

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ᐊᑦᑕᑕᑦᑎᐱᐱᐱᐱ 5 - ᐅᐅᐊᑦᑕᐅᐱᐱᐱ ᐃᑦᑕ ᑕᐱᐅᐱ ᐃᑦᑎᐅᐱᑦᑕ ᐱᑦᑕᑦᑕᐱᐱᐱᐱ

[illegible]



January 31, 2024

Mayor Maliktoo Lyta
Municipality of Kimmirut
P.O. Box 120
Kimmirut, Nunavut
X0A 0N0

Mr. Killiktee Padluq
Chairperson
Mayukalik Hunters and Trappers Association
P.O. Box 99
Kimmirut, Nunavut
X0A 0N0

RE: MARY RIVER PROJECT– STEENSBY FISHERIES OFFSETTING PLANS NOTICE

Dear Mayor and Chairperson,

I am reaching out to share additional information that Baffinland Iron Mines Corporation (Baffinland) has gathered following our meetings in late 2023 regarding permitting of the Steensby Component of the Mary River Project. The Steensby Component is the original Project approved by the Nunavut Impact Review Board (NIRB) in 2012, consisting of a 149km railway that will connect the mine to Steensby Port.

We are now working on the final designs of the railway and port, and obtaining the remaining permits required to allow construction to proceed. This includes two *Fisheries Act* Authorizations (FAAs) from the Department of Fisheries and Oceans Canada (DFO) to authorize work that will impact fish habitat in freshwater bodies between the Mine Site and Steensby Port, and in the marine area surrounding Steensby Port. Two Authorizations will be required:

- Authorization for construction of the Steensby Railway (freshwater Authorization)
- Authorization for construction of the docks, a causeway connecting Steensby Island to the mainland and the infilling of a tidal pool (marine Authorization)

Each of these authorizations will require Baffinland to “offset” losses of fish habitat, by creating new fish habitat equal to what is removed during construction. An overview of the proposed offset strategies is provided below.

Freshwater Offsetting Plans

The freshwater FAA application looks mostly at crossings over fish bearing streams along the Steensby Railway and at Steensby Port where fish passage must be maintained, but where works under the high water mark may remove fish habitat. The proposed offsetting option involves the introduction of Arctic char into a northern tributary of Cockburn Lake (Δ^bΛP^c▷^d◁^e ◁^fΛ^g), where this species is currently absent, but where overwintering and rearing habitat has been identified (Attachment 1). Arctic char is absent from this larger northern tributary due to the presence of several waterfall barriers connecting this tributary to the north end of Cockburn Lake. Arctic char would be captured from several local waterbodies and transported by helicopter to the non-fish-bearing lakes for release. This would involve working together to identify

sources of fish, fish capture, introduction and monitoring. In addition to increasing anadromous Arctic Char to a new water body, this could also support the fishery in Cockburn Lake, which we understand is harvested occasionally by the communities.

DFO requires proponents to identify contingency offsetting measures in case the preferred option is not successful. Therefore, Baffinland proposes to continue with the originally proposed option we discussed along the Milne Inlet Tote Road (Attachment 2) and also with the project to introduce Arctic char in Cockburn Lake. Attached is a presentation, labeled Attachment 3 – Freshwater Offsetting Plan, which provides more details about the proposed freshwater offsetting measures.

Marine Fisheries Offsetting Plans

The marine FAA application looks at where fish habitat will be replaced by several docks and a causeway in the marine environment around Steensby Port. The most common and effective offsetting opportunity is the construction of a rocky reef offset structure to facilitate the sustained presence of marine species in the Steensby Inlet area. Four potential candidate sites were considered and assessed (Attachment 4). A site located approximately 1km from the proposed Construction Dock was selected for the installation of the rocky reef habitat (Attachment 5).

Attached is a presentation, labeled Attachment 6 – Steensby Port Facility Offsetting Plan, which provides more details about the proposed marine offsetting measures.

Complementary Measures

Complementary measures are investments in data collection and scientific research to maintain or enhance the conservation and protection of fish habitat. Baffinland may include up to 10% of the required amount of offsetting as complementary measures. This could include monitoring of Arctic Char to better understand population and behaviours. Baffinland will support investments in complementary measures to address offsetting requirements with support from community stakeholders and DFO.

Should you have any comments, questions or would like to discuss this topic further, we would be pleased to arrange a meeting at a time that works for you.

Sincerely,

Joe Tigullaraq
Head of Northern Affairs

A handwritten signature in black ink, appearing to read "Tigullaraq", written over a light blue rectangular background.

cc. Elisabeth Luther, Senior Manager Regulatory Affairs

Attachments

Attachment 1 – Preferred Freshwater Offsetting Site (Fish Introduction)

Attachment 2 – Freshwater Contingency Offsetting Site (Habitat Enhancement)

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ΔΛΕΤΑΡΧΙΚΟ ΠΡΩΤΟΚΟΛΛΟ

[illegible][illegible]

ငါတို့ အသံအသွယ်ကို ပျော်ရွှင်စွာ နားထောင်ပါ

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Δεξιόστροφος Λαγός

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M. J. G. J. G. J. G.

$\dot{\gamma} \wedge \cap J^c \subset U^{qb}$

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◀^cCC^{fb}NP_L↯^c

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ᐋᑦᑕᑕᑦᑎᐱᐱᐱᐱᐱ 6 - ᐃᑦᐱᑦᑕᑦᑕᑦᑕᑦᑕᑦᑕ ᑕᑕᑕᑕᑕᑕᑕᑕ ᐱᑦᑕᑕᑕᑕᑕᑕ ᑕᑕᑕᑕᑕᑕᑕᑕ ᑕᑕᑕᑕᑕᑕᑕᑕ ᑕᑕᑕᑕᑕᑕᑕᑕ



January 31, 2024

Mayor Jimmy Manning
Municipality of Kinngait
P.O. Box 30
Kinngait, Nunavut
X0A 0C0

Mr. Simiga Suvega
Chairperson
Aiviq Hunters and Trappers Organization
P.O. Box 300
Kinngait, Nunavut
X0A 0C0

RE: MARY RIVER PROJECT– STEENSBY FISHERIES OFFSETTING PLANS NOTICE

Dear Mayor and Chairperson,

I am reaching out to share additional information that Baffinland Iron Mines Corporation (Baffinland) has gathered following our meetings in late 2023 regarding permitting of the Steensby Component of the Mary River Project. The Steensby Component is the original Project approved by the Nunavut Impact Review Board (NIRB) in 2012, consisting of a 149km railway that will connect the mine to Steensby Port.

We are now working on the final designs of the railway and port, and obtaining the remaining permits required to allow construction to proceed. This includes two *Fisheries Act* Authorizations (FAAs) from the Department of Fisheries and Oceans Canada (DFO) to authorize work that will impact fish habitat in freshwater bodies between the Mine Site and Steensby Port, and in the marine area surrounding Steensby Port. Two Authorizations will be required:

- Authorization for construction of the Steensby Railway (freshwater Authorization)
- Authorization for construction of the docks, a causeway connecting Steensby Island to the mainland and the infilling of a tidal pool (marine Authorization)

Each of these authorizations will require Baffinland to “offset” losses of fish habitat, by creating new fish habitat equal to what is removed during construction. An overview of the proposed offset strategies is provided below.

Freshwater Offsetting Plans

The freshwater FAA application looks mostly at crossings over fish bearing streams along the Steensby Railway and at Steensby Port where fish passage must be maintained, but where works under the high water mark may remove fish habitat. The proposed offsetting option involves the introduction of Arctic char into a northern tributary of Cockburn Lake (Δ^bΛP^c▷^d↵^e◁^f◁^gΛ^h), where this species is currently absent, but where overwintering and rearing habitat has been identified (Attachment 1). Arctic char is absent from this larger northern tributary due to the presence of several waterfall barriers connecting this tributary to the north end of Cockburn Lake. Arctic char would be captured from several local waterbodies and transported by helicopter to the non-fish-bearing lakes for release. This would involve working together to identify

sources of fish, fish capture, introduction and monitoring. In addition to increasing anadromous Arctic Char to a new water body, this could also support the fishery in Cockburn Lake, which we understand is harvested occasionally by the communities.

DFO requires proponents to identify contingency offsetting measures in case the preferred option is not successful. Therefore, Baffinland proposes to continue with the originally proposed option we discussed along the Milne Inlet Tote Road (Attachment 2) and also with the project to introduce Arctic char in Cockburn Lake. Attached is a presentation, labeled Attachment 3 – Freshwater Offsetting Plan, which provides more details about the proposed freshwater offsetting measures.

Marine Fisheries Offsetting Plans

The marine FAA application looks at where fish habitat will be replaced by several docks and a causeway in the marine environment around Steensby Port. The most common and effective offsetting opportunity is the construction of a rocky reef offset structure to facilitate the sustained presence of marine species in the Steensby Inlet area. Four potential candidate sites were considered and assessed (Attachment 4). A site located approximately 1km from the proposed Construction Dock was selected for the installation of the rocky reef habitat (Attachment 5).

Attached is a presentation, labeled Attachment 6 – Steensby Port Facility Offsetting Plan, which provides more details about the proposed marine offsetting measures.

Complementary Measures

Complementary measures are investments in data collection and scientific research to maintain or enhance the conservation and protection of fish habitat. Baffinland may include up to 10% of the required amount of offsetting as complementary measures. This could include monitoring of Arctic Char to better understand population and behaviours. Baffinland will support investments in complementary measures to address offsetting requirements with support from community stakeholders and DFO.

Should you have any comments, questions or would like to discuss this topic further, we would be pleased to arrange a meeting at a time that works for you.

Sincerely,

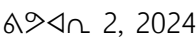
Joe Tigullaraq
Head of Northern Affairs

A handwritten signature in black ink, appearing to read "Tigullaraq", written over a light blue rectangular background.

cc. Elisabeth Luther, Senior Manager Regulatory Affairs

Attachments

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 X0A 0S0

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005525

Miguel

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ΔCC^{6b}PL^{ΔC}

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[illegible]



January 31, 2024

Mayor Joshua Arreak
Hamlet of Pond Inlet
P.O. Box 180
Pond Inlet, Nunavut
X0A 0S0

Mr. Mathias Kaunak
Chairperson
Mittimatalik Hunters and Trappers Organization
P.O. Box 189
Pond Inlet, Nunavut
X0A 0S0

RE: MARY RIVER PROJECT– STEENSBY FISHERIES OFFSETTING PLANS VALIDATION

Dear Mayor and Chairperson,

I am reaching out to share additional information that Baffinland Iron Mines Corporation (Baffinland) has gathered following our meetings in late 2023 regarding permitting of the Steensby Component of the Mary River Project. The Steensby Component is the original Project approved by the Nunavut Impact Review Board (NIRB) in 2012, consisting of a 149km railway that will connect the mine to Steensby Port.

We are now working on the final designs of the railway and port, and obtaining the remaining permits required to allow construction to proceed. This includes two *Fisheries Act* Authorizations (FAAs) from the Department of Fisheries and Oceans Canada (DFO) to authorize work that will impact fish habitat in freshwater bodies between the Mine Site and Steensby Port, and in the marine area surrounding Steensby Port. Two Authorizations will be required:

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- Authorization for construction of the docks, a causeway connecting Steensby Island to the mainland and the infilling of a tidal pool (marine Authorization)

Each of these authorizations will require Baffinland to “offset” losses of fish habitat, by creating new fish habitat equal to what is removed during construction. An overview of the proposed offset strategies is provided below.

Freshwater Offsetting Plans

The freshwater FAA application looks mostly at crossings over fish bearing streams along the Steensby Railway and at Steensby Port where fish passage must be maintained, but where works under the high water mark may remove fish habitat. One of the offset options we discussed in 2023 was habitat enhancements in lakes and streams along the Milne Inlet Tote Road. The feedback we received at the time was neutral and likely a result of communities being more interested in offsetting opportunities that can provide a community benefit.

Following our last meetings considered alternative offset options and identified a new opportunity that better satisfies the community acceptability criteria. The proposed offsetting option involves the introduction of Arctic char into a northern tributary of Cockburn Lake (Δ^ΛΡ^ϙϙ^ϙϙ^ϙ ϙ^ϙϙ^ϙ), where this species is currently absent, but where overwintering and rearing habitat has been identified (Attachment 1). Arctic char is absent from this larger northern tributary due to the presence of several waterfall barriers connecting this tributary to the north end of Cockburn Lake. Working with you and your community, Arctic char would be captured from several local waterbodies and transported by helicopter to the non-fish-bearing lakes for release. This would involve working together to identify sources of fish, fish capture, introduction and monitoring. In addition to increasing anadromous Arctic Char to a new water body, this could also support the fishery in Cockburn Lake, which we understand is harvested occasionally by the communities.

DFO requires proponents to identify contingency offsetting measures in case the preferred option is not successful. Therefore, Baffinland proposes to continue with the originally proposed option we discussed along the Milne Inlet Tote Road (Attachment 2) and also with the project to introduce Arctic char in Cockburn Lake. Attached is a presentation, labeled Attachment 3 – Freshwater Offsetting Plan, which provides more details about the proposed freshwater offsetting measures.

Marine Fisheries Offsetting Plans

The marine FAA application looks at where fish habitat will be replaced by several docks and a causeway in the marine environment around Steensby Port. Baffinland has greatly reduced the construction activities that were previously planned for that could have disturbed fish and marine mammals, including open water pile installations and underwater blasting. The installation of marine infrastructure and placement of rock infill in the marine environment cannot be avoided, however, and will result in the removal of fish habitat that requires offsetting.

The most common and effective offsetting opportunity is the construction of a rocky reef offset structure to facilitate the sustained presence of marine species in the Steensby Inlet area. Four potential candidate sites were considered, assessed and discussed with your community in 2023 (Attachment 4). A site located approximately 1km from the proposed Construction Dock was selected for the installation of the rocky reef habitat (Attachment 5).

Attached is a presentation, labeled Attachment 6 – Steensby Port Facility Offsetting Plan, which provides more details about the proposed marine offsetting measures.

Complementary Measures

Complementary measures are investments in data collection and scientific research to maintain or enhance the conservation and protection of fish habitat. Baffinland may include up to 10% of the required amount of offsetting as complementary measures. This could include monitoring of Arctic Char to better understand population and behaviours. Baffinland will support investments in complementary measures to address offsetting requirements with support from community stakeholders and DFO.

Validation of Offsetting Measures

We welcome your feedback on the selection of freshwater offsetting measures, site selection and proposed contingency measures. Should you have any comments, questions or would like to discuss either the marine or freshwater offsetting further, we would be pleased to arrange a meeting at a time that works for you.

Sincerely,

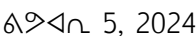
A handwritten signature in black ink, appearing to read "Joe Tigullaraq", on a light gray rectangular background.

Joe Tigullaraq
Head of Northern Affairs

cc. Elisabeth Luther, Senior Manager Regulatory Affairs

Attachments

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[illegible]

005525

W. J. Long

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△CC^{9b}PL^{9c}

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၎င်းတို့သည် နယ်လွှာများတွင် အောက်ဖော်ပြပါအတိုင်း ပြောင်းလဲနေကြောင်း တွေ့ရှိရပါသည်။

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January 31, 2024

Mayor Philip Anguratsiaq
Hamlet of Sanirajak
P.O. Box 198
Sanirajak, Nunavut
X0A 0K0

Mr. Paul Nangmalik
Chairperson
Hunters and Trappers Organization
P.O. Box 14
Sanirajak, Nunavut
X0A 0K0

RE: MARY RIVER PROJECT– STEENSBY FISHERIES OFFSETTING PLANS VALIDATION

Dear Mayor and Chairperson,

I am reaching out to share additional information that Baffinland Iron Mines Corporation (Baffinland) has gathered following our meetings in late 2023 regarding permitting of the Steensby Component of the Mary River Project. The Steensby Component is the original Project approved by the Nunavut Impact Review Board (NIRB) in 2012, consisting of a 149km railway that will connect the mine to Steensby Port.

We are now working on the final designs of the railway and port, and obtaining the remaining permits required to allow construction to proceed. This includes two *Fisheries Act* Authorizations (FAAs) from the Department of Fisheries and Oceans Canada (DFO) to authorize work that will impact fish habitat in freshwater bodies between the Mine Site and Steensby Port, and in the marine area surrounding Steensby Port. Two Authorizations will be required:

- Authorization for construction of the Steensby Railway (freshwater Authorization)
- Authorization for construction of the docks, a causeway connecting Steensby Island to the mainland and the infilling of a tidal pool (marine Authorization)

Each of these authorizations will require Baffinland to “offset” losses of fish habitat, by creating new fish habitat equal to what is removed during construction. We have previously shared some information about these two applications and proposed offsets. As we integrated the feedback received to date, we are now seeking your input to support the selected offset measures, which are described below.

Freshwater Offsetting Plans

The freshwater FAA application looks mostly at crossings over fish bearing streams along the Steensby Railway and at Steensby Port where fish passage must be maintained, but where works under the high water mark may remove fish habitat. One of the offset options we discussed in 2023 was habitat enhancements in lakes and streams along the Milne Inlet Tote Road. The feedback we received at the time was neutral and likely a result of communities being more interested in offsetting opportunities that can provide a community benefit.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Tigullaraq", is shown on a light gray rectangular background.

Joe Tigullaraq
Head of Northern Affairs

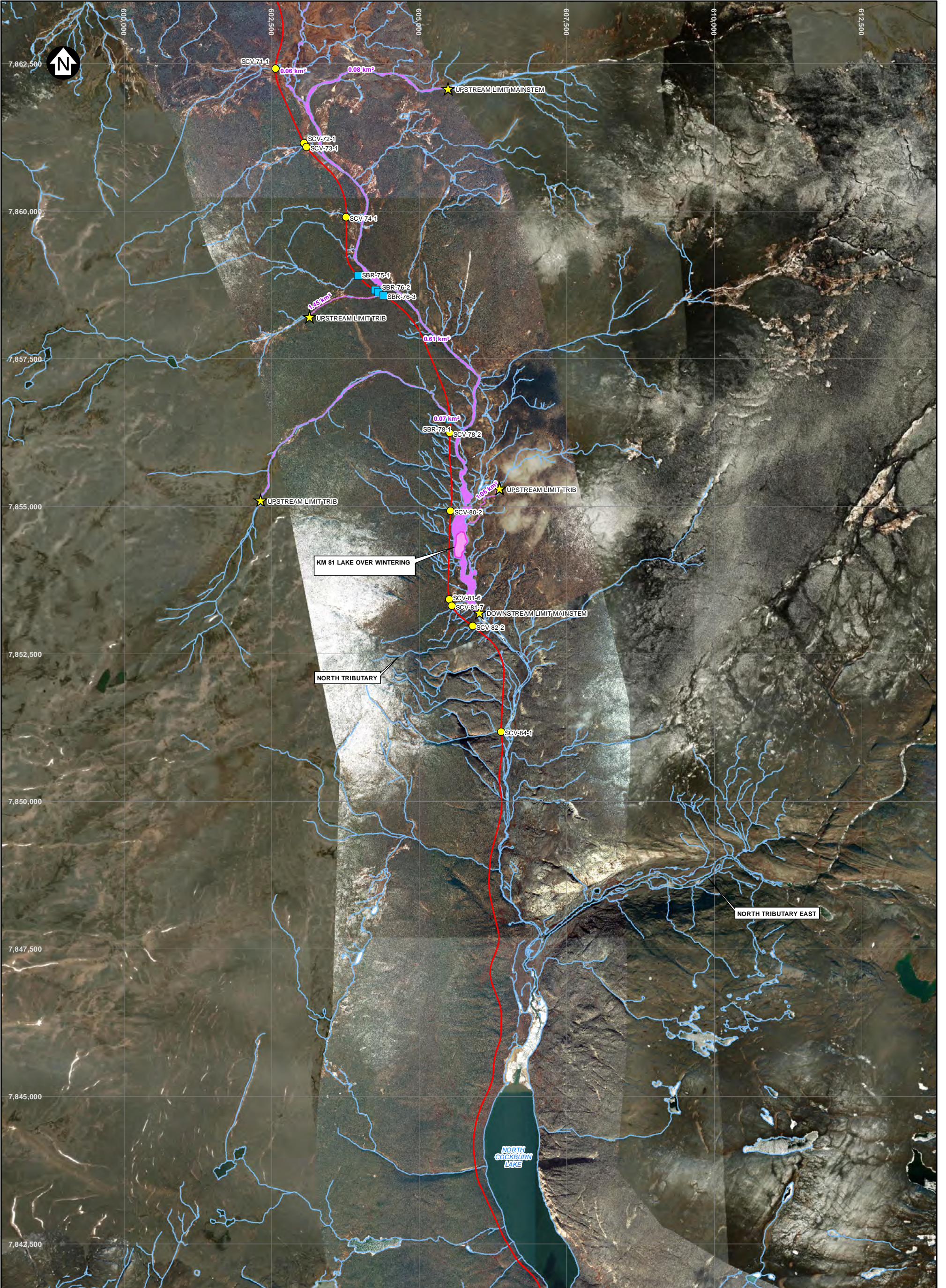
cc. Elisabeth Luther, Senior Manager Regulatory Affairs

Attachments

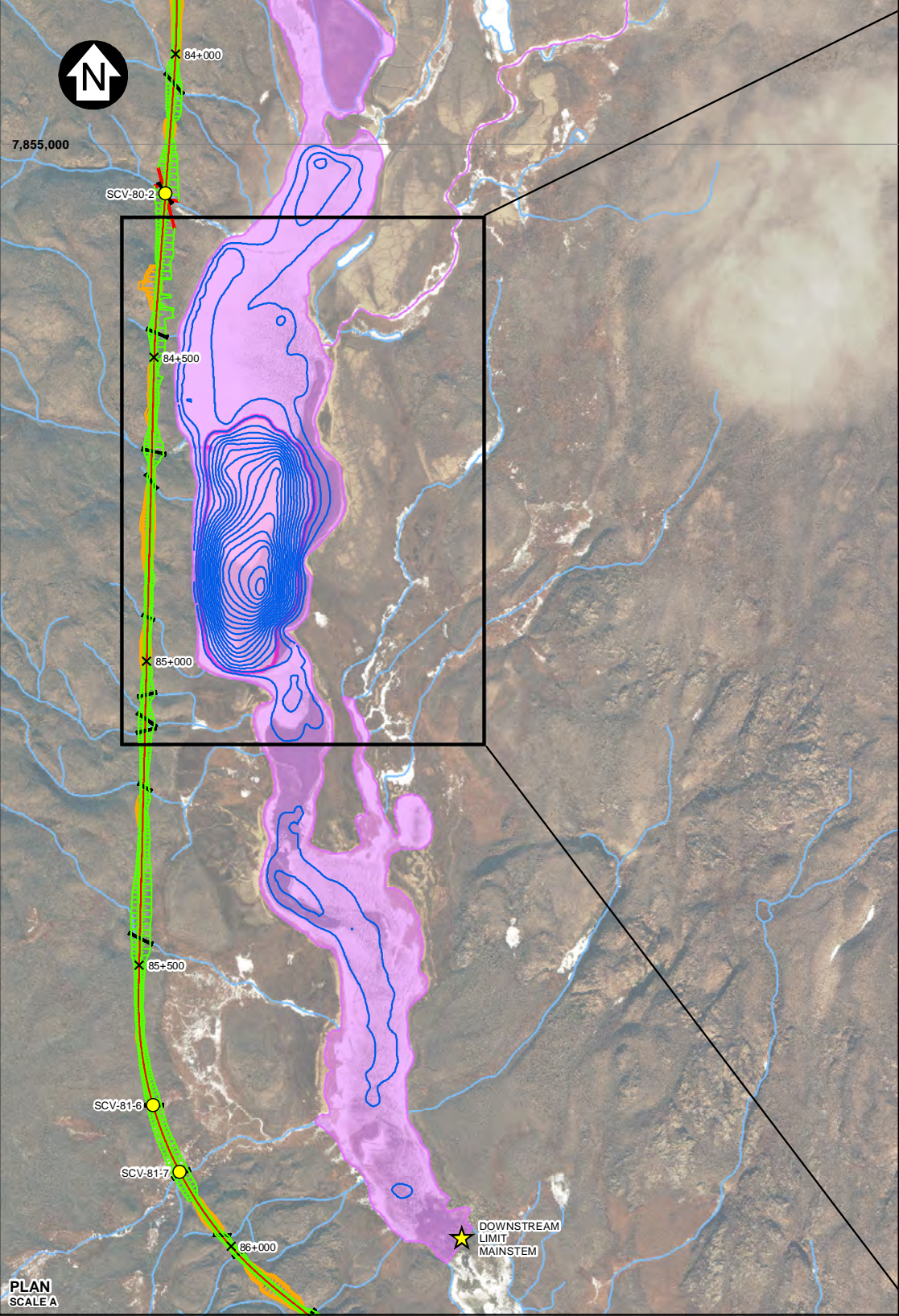
- Attachment 1 – Preferred Freshwater Offsetting Site (Fish Introduction)
- Attachment 2 – Freshwater Contingency Offsetting Site (Habitat Enhancement)
- Attachment 3 – Freshwater Offsetting Plan Presentation
- Attachment 4 – Marine Candidate Sites Near Steensby Port Evaluated for Rocky Reef Offsetting
- Attachment 5 – Selected Site for Marine Rocky Reef Offset
- Attachment 6 – Steensby Port Facility Offsetting Plan Presentation

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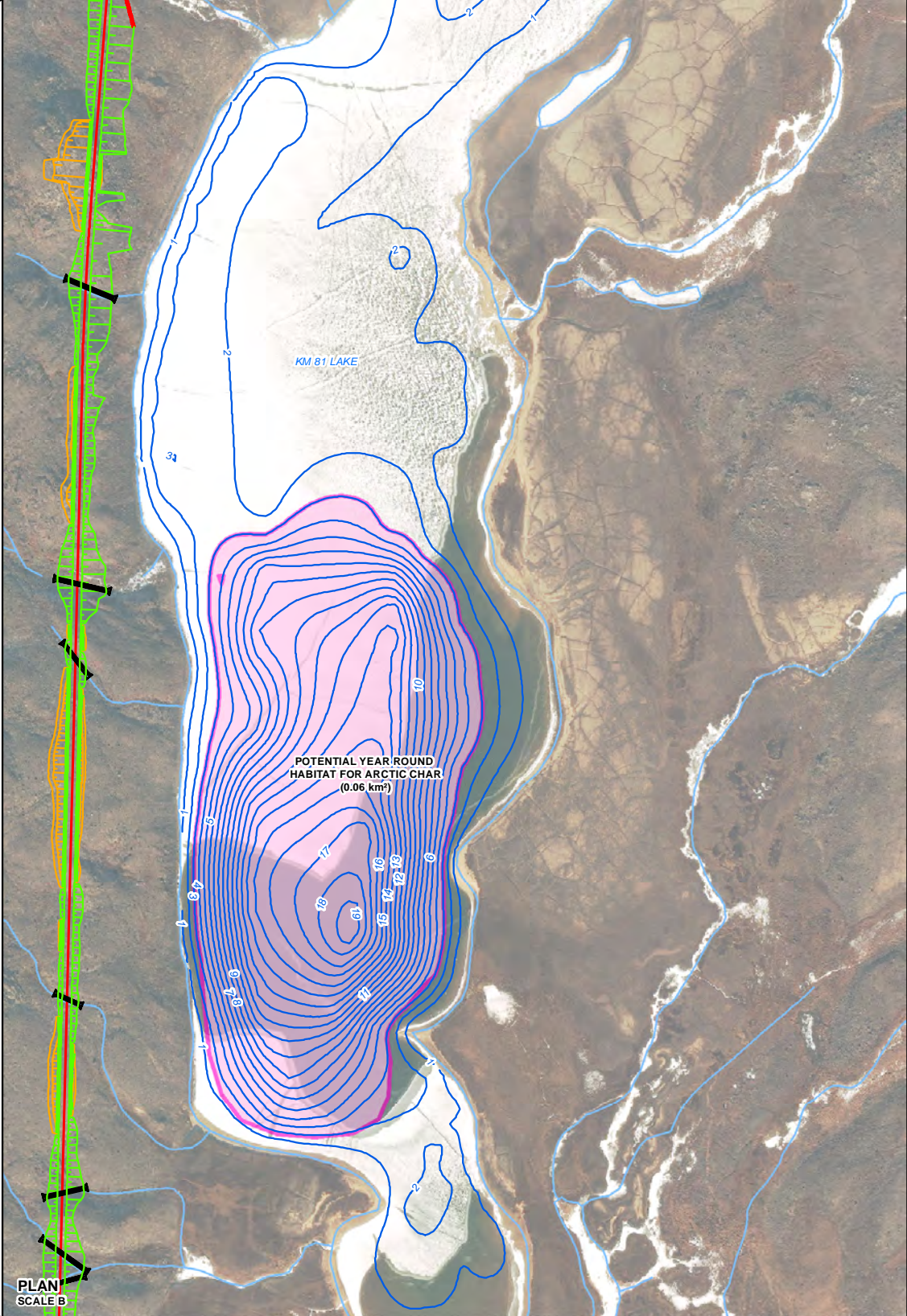
Preferred Freshwater Offsetting Site (Fish Introduction)



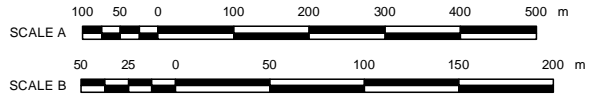
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- LEGEND:**
- | | | | |
|--|---|--|--|
| | CULVERT CROSSING | | POTENTIAL REARING HABITAT FOR ARCTIC CHAR |
| | APPROXIMATE HABITAT LIMITS | | POTENTIAL YEAR ROUND HABITAT FOR ARCTIC CHAR |
| | STEENSBY RAILWAY | | |
| | STEENSBY RAILWAY - CUT | | |
| | STEENSBY RAILWAY - FILL | | |
| | RIVER/STREAM/DRAINAGE | | |
| | KM 81 LAKE BATHYMETRY (DEPTH m) | | |
| | POTENTIAL REARING HABITAT FOR ARCTIC CHAR | | |



- NOTES:**
- COORDINATE GRID IS IN METRES.
COORDINATE SYSTEM: NAD 1983 UTM ZONE 17N.
 - BASE MAP: © 2022 DIGITAL GLOBE, INC. AND GIS ONLINE IMAGERY.



BAFFINLAND IRON MINES CORPORATION

MARY RIVER PROJECT

POTENTIAL YEAR-ROUND HABITAT
FOR ARCTIC CHAR AT KM 81 LAKE



P/A NO.
NB102-181/86

REF NO.
1

ATTACHMENT 1-2

A	19JAN24	ISSUED WITH REPORT	AS	AS	RAC
REV	DATE	DESCRIPTION	DESIGNED	DRAWN	REVIEWED

Freshwater Contingency Offsetting Site (Habitat Enhancement)



LEGEND:

MILNE INLET TOTE ROAD

POTENTIAL DEVELOPMENT AREA

C	19JAN'24	ISSUED WITH REPORT	WOG	AS	RAC
B	31AUG'23	ISSUED WITH REPORT	WOG	AS	RAC
A	14JUL'23	ISSUED WITH REPORT	GMJ	AS	RAC
REV	DATE	DESCRIPTION	DESIGNED	DRAWN	REVIEWED

NOTES:

1. BASE MAP AND CONTOURS PROVIDED BY EAGLE MAPPING (2008).

2. COORDINATE GRID IS SHOWN IN UTM (NAD83) ZONE 17 AND IS IN METRES.

3. IMAGERY PROVIDED BY BAFFINLAND IRON MINES CORPORATION, (DIGITAL GLOBE, INC., JUNE 19, 2022).

BAFFINLAND IRON MINES CORPORATION

MARY RIVER PROJECT

CONTINGENCY TOTE ROAD LAKES
OFFSETTING LOCATIONS

Knight Piésold
CONSULTING

P/A NO.
NB102-181/86

REF NO.
1

ATTACHMENT 2

REV
B

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ATTACHMENT 3 -

January 2024



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2024

Steensby Freshwater Offsetting Plan

2024

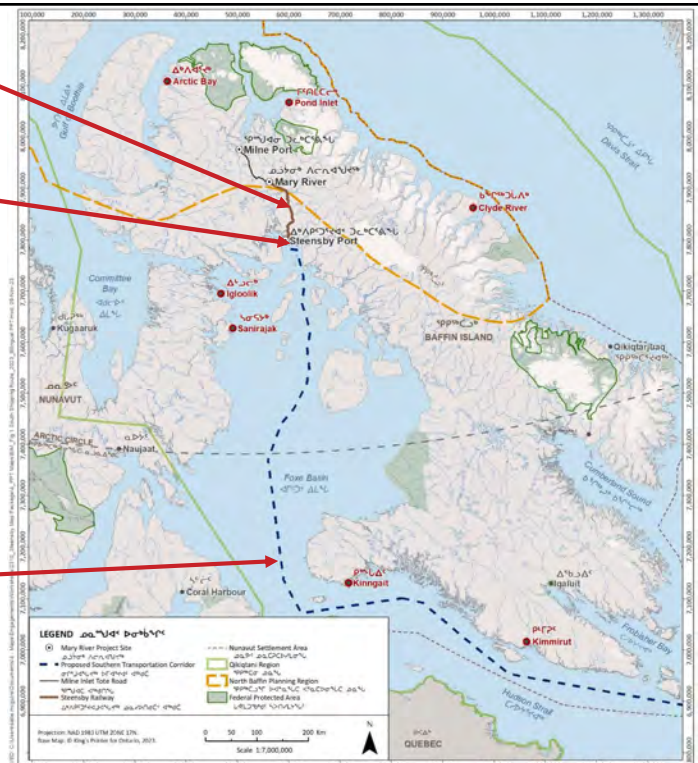


149 Km ᐃᑲᐱᑦᑕᑦᑲᐱᐅᐅᐅᐅᐅᐅ
ᐅᐅᐅᐅᐅᐅᐅᐅᐅᐅ ᐱᐅᐅᐅᐅ
149 Km Steensby Railway

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Steensby Port

ᐱᐅᐅᐅᐅᐅᐅ ᐱᐅᐅᐅᐅ ᐅᐅᐅᐅᐅᐅᐅᐅᐅᐅ Project Overview

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ᐱᐅᐅᐅᐅ
Southern Shipping
Route



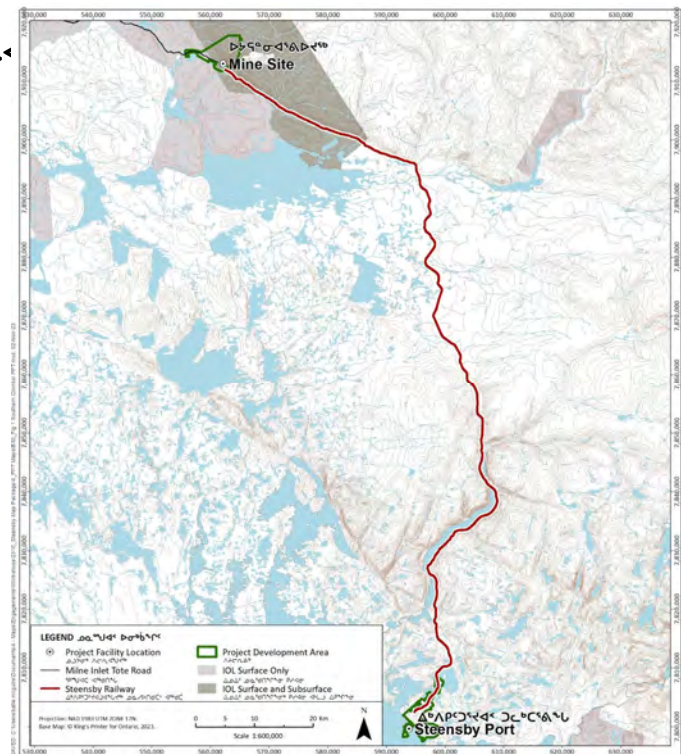
Steensby Railway

Overview

149 Km of mainline track

6.5 loaded train trips per day

60 km/hr maximum speed



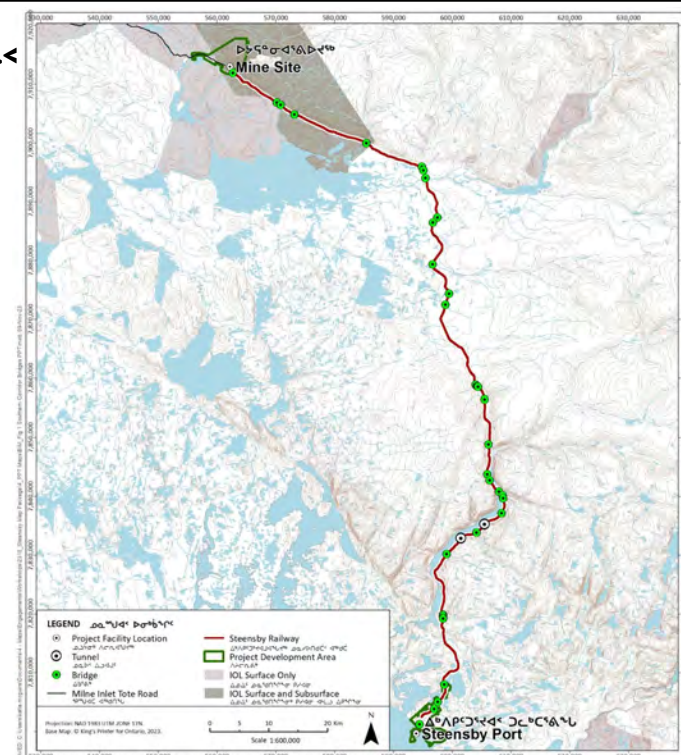
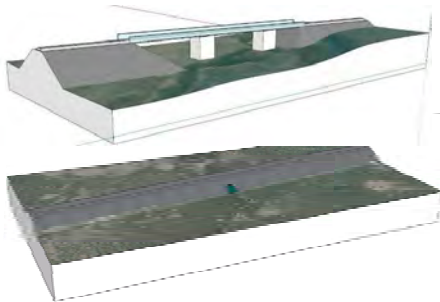
Steensby Railway

Infrastructure

~320 Culverts

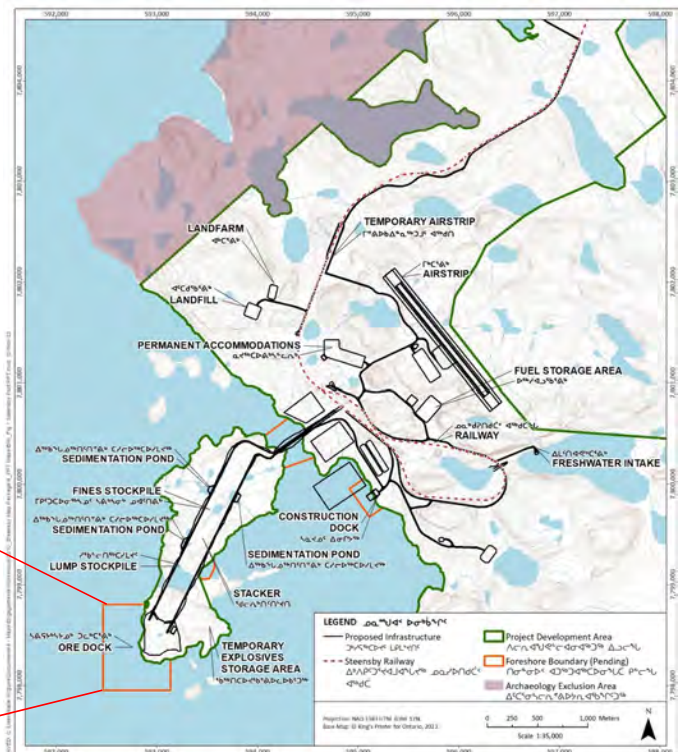
42 Bridges

2 Tunnels

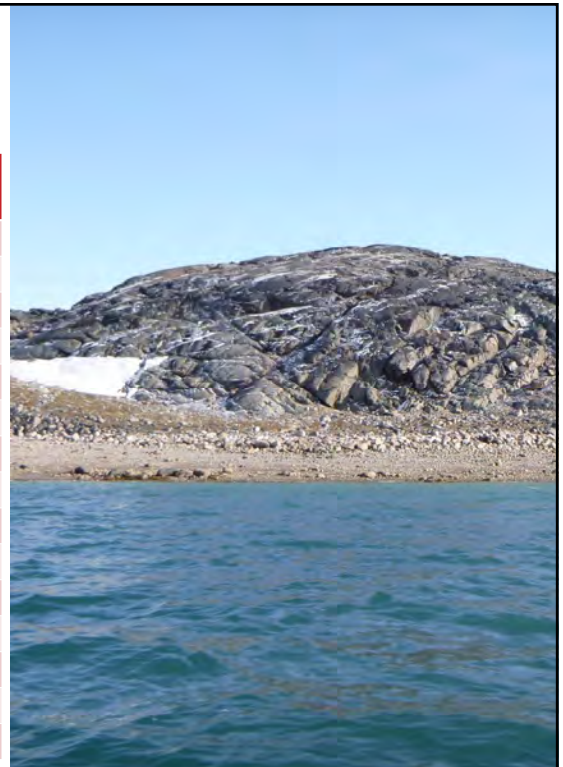


Infrastructure

An aerial photograph showing a large red ship being moved along a long, elevated conveyor system at a port. The ship is positioned on the conveyor, which is supported by a series of rollers and structural beams. The port area is filled with various equipment, including cranes and smaller vehicles. The water is a deep blue-green color, and the surrounding landscape is hilly and arid.



ᐱᓕᑦᑐ Year	ᓄᓇᓂ ᖃᐅᓴᓂᖃ Field Study	ᐱᓕᐸᐸᐸᐸᐸ ᖃᐅᓴᓂᖃ Baseline Study
2007	✓	
2008	✓	
2009		
2010	✓	
2011	✓	
2012		✓
2013		
2014		✓
...		
2018		✓
2019		
2020		
2021	✓	
2022	✓	
2023	✓	✓



Inuit Knowledge Studies

-
- The map displays the Steensby River area in Nunavut, Canada, with a focus on the proposed mine site and various fishing locations. The map includes labels for Mary Lake, Anglurjuk Lake, Nina Bang Lake, Ravi River, and Steensby Port. A legend identifies the project facility location, mine inlet tote road, Steensby Railway, project development area, Arctic Char-General Location, Arctic Char-Land Locked, River of Importance, Fishing Location Year-Round, Jag and Net Fishing Location, and Ocean Fishing Location. The map also shows the Arctic Circle and the 14th parallel.

Δ^ϵбⱭсռσ^ϕЈ^ϕ Λ^ϕδλ^бδ^ϕ ◀▷^ϕδλ▷ⱭL^ϕϕ^ϕ Fisheries Act Requirements



ማረጋገጫ ምርጫ ስልጠና ለምርጫ ስልጠና Selection Criteria



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 ምርጫ ስልጠና ስልጠና
 ዓላማ

Quantity of
Offset Habitat



ልዩ ስልጠና
 ልዩ ስልጠና

Environmental
Impact



ምርጫ ስልጠና
 ምርጫ ስልጠና ስልጠና
 ምርጫ ስልጠና ስልጠና

Proximity to
Railway



ምርጫ ስልጠና
 ምርጫ ስልጠና ስልጠና
 ምርጫ ስልጠና

Community
Involvement



ምርጫ ስልጠና
 ምርጫ ስልጠና ስልጠና

Success
Measures

9

ምርጫ ስልጠና ስልጠና ስልጠና ስልጠና Species Present

ምርጫ ስልጠና
 Arctic char



- ምርጫ ስልጠና
- Widespread

ምርጫ ስልጠና
 Ninespine stickleback



- ምርጫ ስልጠና ስልጠና
- Less common

10

11

12

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Tote Road Enhancement

-
- LEGEND ስልጣን ይጻፍ**
- ① Project Facility Location
 - Mine Inlet Tote Road
 - 20m Interval Contour (20 m Interval)
 - ፀሐይ ልሳሳ (20m Interval)
 - Project Development Area
 - Proposed Offsetting Site
 - ግንባታውን ያግለጽላል
- Projection: NAD 83 UTM Zone 36N
 Base Map: © King's Printer for Ethiopia (2022)
- Scale: 1:100,000

Baffinland

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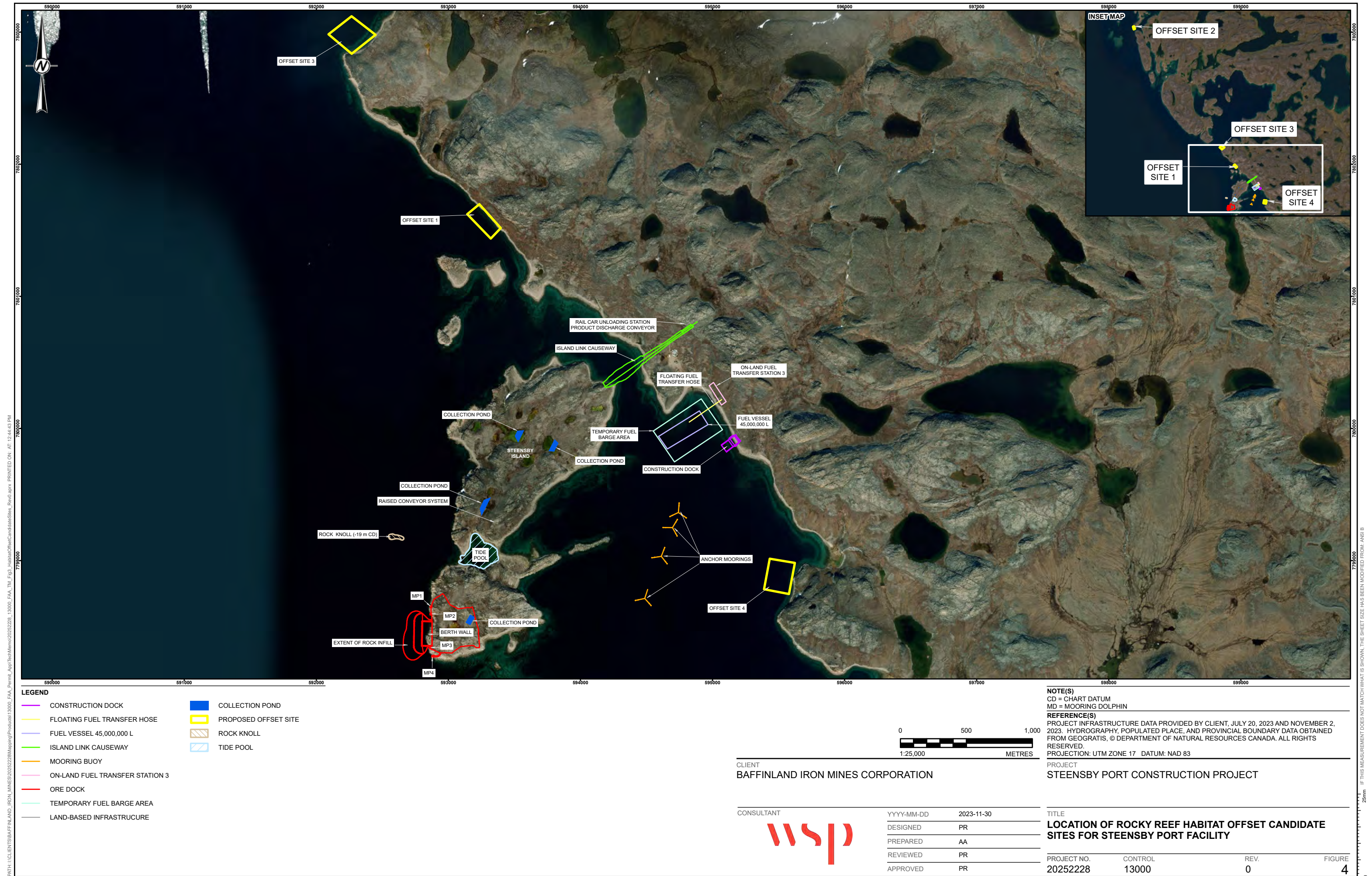
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ATTACHMENT 4 -

Selected Site for Marine Rocky Reef
Offset



$a \nabla b \leq c$ $p^a q^b \Delta r^c$

ATTACHMENT 5 -

Selected Site for Marine Rocky Reef Offset

உள்ளுயிர் புகழ் ஊடுருவ

ATTACHMENT 6 -

Steensby Port Facility Offsetting Plan Presentation

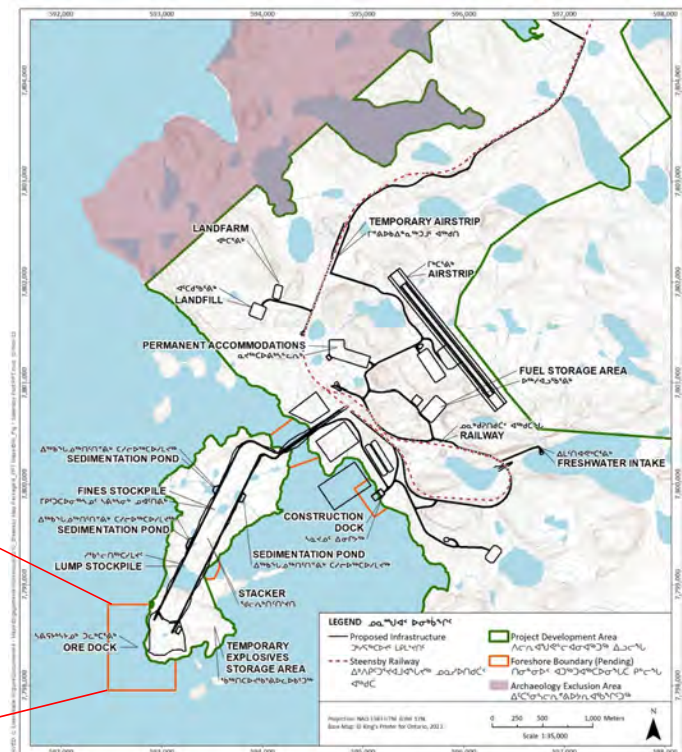


LEGEND

- (●) Mary River Project Site
- Nunavut Settlement Area
- Proposed Southern Transportation Corridor
- Milne Inlet Fuel Road
- Northern Planning Region
- Federal Protected Area

Projection: NAD 1983 UTM Zone 18N
 Base Map: © Esri, Inc. (2000-2010)
 Scale: 1:7,000,000

Infrastructure



1. Initial baseline studies 2007-2010
2. Updated baseline studies 2021-2022
3. Subtidal biophysical surveys (ROV and SCUBA-based) in marine infrastructure footprints and potential offset habitat areas
4. Intertidal surveys of areas above low tide
5. Fish sampling
6. Sediment and benthic infaunal sampling
7. Oceanographic study (mooring deployed for one year)



A photograph showing a rugged, rocky hillside covered in patches of snow and low-lying vegetation. The hillside slopes down towards a body of water, which occupies the foreground. The sky is clear and blue. The water is a deep greenish-blue with visible ripples. The shoreline is composed of small rocks and pebbles.

A large, flat, greenish-brown fish with prominent eyes and a wide mouth, resting on a rocky, algae-covered seabed. The fish has a mottled pattern and a small, dark spot near its eye. The background is a dense, textured expanse of coral and algae.

13



14

Baffinland

Baffinland

ኅኔጦልኃጦፍ ልፒፍገጋርፍጦፍ ዲሪሪጋፍጠፍ ልኤኖጋርፍገፍገፍ? What species will use the rocky reef?



ሶጵጵፍገፍ
Shrimp



ኮፋሪፍ
Fourhorn Sculpin



ፅፒሪፍገፍ ፅፒሪፍገፍ ፅፒሪፍገፍ
Tunicates



ኮፋሪፍ ጠፋፍ ፅፒሪፍ
Greenland Cod



ፅፒሪፍ ልፒሪፍ
Green Urchin



ልፒፍገፍ
Arctic Char



ፅፒሪፍ
Mussels



ፅፒሪፍ ጠፋፍ ፅፒሪፍ
Arctic Cod

18

ርገፍ ለፅፒሪፍገፍ ልፒሪፍ ዲሪሪፍገፍ Marine life growing on the existing habitat



ኮፋሪፍ ልፒሪፍ
Brown Macroalgae



ፅፒሪፍ ልፒሪፍ
Green Macroalgae



ኮፋሪፍ ፅፒሪፍ ልፒሪፍ
Sculpin amidst Green Algae

19

Proposed Offsetting Location

The map displays the proposed infrastructure for the Steensdyk Railway. Key features include:

- Project Development Area:** Indicated by a green outline.
- Steensdyk Railway:** Shown as a dashed line.
- Infrastructure Components:**
 - LANDFARM
 - LANDFILL
 - PERMANENT ACCOMMODATIONS
 - TEMPORARY AIRSTRIP
 - AIRSTRIP
 - FUEL STORAGE AREA
 - RAILWAY
 - FRESHWATER INTAKE
 - SEDIMENTATION POND
 - FINES STOCKPILE
 - SEDIMENTATION POND
 - LUMP STOCKPILE
 - STACKER
 - TEMPORARY EXPLOSIVES STORAGE AREA
 - CONSTRUCTION DOCK
 - ORE DOCK
- Planned Habitat Offset:** Indicated by a yellow area.

LEGEND

- Project Development Area
- Proposed Infrastructure
- Steensdyk Railway
- Project Boundary (Pending)
- Planned Habitat Offset

Scale: 0 200 400 600 Meters

North Arrow: N

Map Date: 01 May 2014