



NIRB File No.: 08MN053

NIRB Registry Link: www.nirb.ca/project/125767

NWB File No.: 2AM-MRY 1325

June 4, 2025

To: Mary River Distribution List

Sent via email

Re: **Comment Request for Baffinland Iron Mines Corporation's Mary River Project 2024 Annual Report**

Dear Parties:

On May 30, 2024, the Nunavut Impact Review Board (NIRB or Board) received Baffinland Iron Mines Corporation's (Baffinland or Proponent) Mary River Project 2023 *Annual Report* as required by the Mary River Project's Project Certificate No. 005, Amendment No. 005. [Appendix A](#) of this letter provides a list of documents.

Effects monitoring

As required by legislation¹ and the Project Certificate, the NIRB's monitoring program focuses on compliance and effects monitoring including information from Parties and Responsible Authorities. By copy of this letter, the NIRB is providing parties the opportunity to review the Annual Report and submit comments to the NIRB by **July 4, 2025**, on:

- a. Whether the conclusions reached by Baffinland in the *2024 Annual Report* are valid; and
- b. Any areas of significance requiring further supporting information or any changes to the monitoring program which may be required.

An example format for comments is included in [Appendix B](#) of this letter.

Compliance monitoring

All regulatory Authorities, including the Qikiqtani Inuit Association, are also required to provide a compliance update on the following:

- a. Provide a summary of any compliance monitoring and/or site inspections undertaken in association with the Project, including specifically;

¹ Sections 12.7.3 of the *Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in right of Canada (Nunavut Agreement)*, s. 135(4) of the *Nunavut Planning and Project Assessment Act*, S.C. 2013, c. 14, s. 2 (NuPPAA)

- i. Identify the terms and conditions from the Project Certificate which have been incorporated into any permits, certificates, licenses, or other approvals issued for the Project, where applicable, and report annually to the NIRB on the status of those incorporated terms and conditions;
- ii. A summary of any inspections conducted during the 2024 reporting period, and the results of these inspections; and
- iii. A summary of Baffinland's compliance status with regard to authorizations that have been issued for the Project.

This information is important to assist the NIRB assess, coordinate, integrate, and ensure that the Board has the information to accurately measure effects, adequately assess compliance with terms and conditions, regulatory instruments, and agreements, and whether the Projects are carried out in accordance with the terms and conditions as set out in the project certificate.

Please send all forthcoming submissions directly to the NIRB via email at info@nirb.ca.

Questions regarding the NIRB's monitoring process can be directed to the undersigned at kmorrison@nirb.ca; and inquiries related to the Mary River Project can be directed to the NIRB's Monitoring Officer, Varun Nayak at vnayak@nirb.ca.

Sincerely,



Keith Morrison
Manager, Project Monitoring
Nunavut Impact Review Board

cc: Lou Kamermans, Baffinland Iron Mines Corporation
Meagan Lord-Hoyle, Baffinland Iron Mines Corporation

Attachment (2): Appendix A: NIRB Public Registry Document ID Numbers
Appendix B: Example Table for Comments on Annual Report

APPENDIX A: NIRB DOCUMENT ID NUMBERS

The *2024 Annual Report* and supplemental documents for the Baffinland Mary River Project are available on the NIRB's public registry at www.nirb.ca/project/125767. Documents can be accessed by:

- Selecting the “Documents Tab” of the Project Dashboard(s) then select the “Annual Report” category on the left pane;
- Selecting “Recent Documents” on the Project Dashboards; or
- Searching the Public Registry with the Document ID numbers

Summary of documents submitted:

Document	Document ID
250530-08MN053-2024 Annual Rpt-IMRE.pdf	355641
250530-08MN053-2024 Annual Rpt-App A Admin Responsibility & PC Status-IMRE.pdf	355501
250530-08MN053-2024 Annual Rpt-App B.1 Engagement Records-IMRE.pdf	355502
250530-08MN053-2024 Annual Rpt-App B.2 Shipping Meeting Records-IMRE.pdf	355503
250530-08MN053-2024 Annual Rpt-App B.3 Shipping Fact Sheet-IMRE.pdf	355504
250530-08MN053-2024 Annual Rpt-App B.4.1 Steensby Community Engage Summary-Pt 1-IMRE.pdf	355505
250530-08MN053-2024 Annual Rpt-App B.4.1 Steensby Community Engage Summary-Pt 2-IMRE.pdf	355506
250530-08MN053-2024 Annual Rpt-App B.4.1 Steensby Community Engage Summary-Pt 3-IMRE.pdf	355507
250530-08MN053-2024 Annual Rpt-App B.4.2. Fish Offsetting Community Notice & Ltrs-IMRE.pdf	355508
250530-08MN053-2024 Annual Rpt-App B.4.3. Fish Offsetting Community Engage Summary-IMRE.pdf	355509
250530-08MN053-2024 Annual Rpt-App B.4.4 Steensby Elders Visit Summary-IMRE.pdf	355510
250530-08MN053-2024 Annual Rpt-App B.4.5. Steensby Community Engage Summary-IMRE.pdf	355511
250530-08MN053-2024 Annual Rpt-App C.1 MEWG Meeting Records-IMRE.pdf	355512
250530-08MN053-2024 Annual Rpt-App C.2 TEWG Meeting Records-IMRE.pdf	355513
250530-08MN053-2024 Annual Rpt-App C.3 Enviro Working Groups ToR-IMRE.pdf	355514
250530-08MN053-2024 Annual Rpt-App C.4 Register of Consult w Makivik Corp.-IMRE.pdf	355515
250530-08MN053-2024 Annual Rpt-App C.5 SEMWG Bi-lingual Meeting Summary-IMRE.pdf	355516
250530-08MN053-2024 Annual Rpt-App C.6 Mary River SEMWG ToR-IMRE.pdf	355517
250530-08MN053-2024 Annual Rpt-App C.7 Smry of MEWG and TEWG Feedback-IMRE.pdf	355518
250530-08MN053-2024 Annual Rpt-App D Photo Essay-IMRE.pdf	355519
250530-08MN053-2024 Annual Rpt-App E.1 Response to Comments 2023 NIRB Annual Rpt-IMRE.pdf	355520

250530-08MN053-2024 Annual Rpt-App E.2 Responses to NIRB Recommen- IMRE.pdf	355521
250530-08MN053-2024 Annual Rpt-App F Commitment Tracker-IMRE.pdf	355522
250530-08MN053-2024 Annual Rpt-App G.2.1 Air Quality & Meteorology Rpt- IMRE.pdf	355523
250530-08MN053-2024 Annual Rpt-App G.2.2 Incinerator Testing Rpt-IMRE.pdf	355524
250530-08MN053-2024 Annual Rpt-App G.2.3 S1 Industrial Hygiene Moni Rpt-Pt 1-IMRE.pdf	355525
250530-08MN053-2024 Annual Rpt-App G.2.3 S1 Industrial Hygiene Moni Rpt-Pt 2-IMRE.pdf	355526
250530-08MN053-2024 Annual Rpt-App G.2.3 S1 Industrial Hygiene Moni Rpt-Pt 3-IMRE.pdf	355527
250530-08MN053-2024 Annual Rpt-App G.2.4 Industrial Hygiene Moni Rpt-Pt 1- IMRE.pdf	355533
250530-08MN053-2024 Annual Rpt-App G.2.4 Industrial Hygiene Moni Rpt-Pt 2- IMRE.pdf	355535
250530-08MN053-2024 Annual Rpt-App G.2.5 Dust Audit Committee Rpt-Pt 1- IMRE.pdf	355536
250530-08MN053-2024 Annual Rpt-App G.2.5 Dust Audit Committee Rpt-Pt 2- IMRE.pdf	355537
250530-08MN053-2024 Annual Rpt-App G.2.5 Dust Audit Committee Rpt-Pt 3- IMRE.pdf	355538
250530-08MN053-2024 Annual Rpt-App G.2.6.1 2024 Geotech Inspection Rpt-Pt 1- IMRE.pdf	355539
250530-08MN053-2024 Annual Rpt-App G.2.6.1 2024 Geotech Inspection Rpt-Pt 2- IMRE.pdf	355541
250530-08MN053-2024 Annual Rpt-App G.2.6.1 2024 Geotech Inspection Rpt-Pt 3- IMRE.pdf	355542
250530-08MN053-2024 Annual Rpt-App G.2.6.2 2 Geomechanic & Geotech Inspection of Facilities-IMRE.pdf	355543
250530-08MN053-2024 Annual Rpt-App G.2.7 Tote Road Priority Actions- IMRE.pdf	355544
250530-08MN053-2024 Annual Rpt-App G.2.8 Tote Road Fish Habitat Moni Rpt-Pt 1-IMRE.pdf	355612
250530-08MN053-2024 Annual Rpt-App G.2.8 Tote Road Fish Habitat Moni Rpt-Pt 2-IMRE.pdf	355613
250530-08MN053-2024 Annual Rpt-App G.2.8 Tote Road Fish Habitat Moni Rpt-Pt 3-IMRE.pdf	355614
250530-08MN053-2024 Annual Rpt-App G.2.8 Tote Road Fish Habitat Moni Rpt-Pt 4-IMRE.pdf	355615
250530-08MN053-2024 Annual Rpt-App G.2.8 Tote Road Fish Habitat Moni Rpt-Pt 5-IMRE.pdf	355616
250530-08MN053-2024 Annual Rpt-App G.2.8 Tote Road Fish Habitat Moni Rpt-Pt 6-IMRE.pdf	355617
250530-08MN053-2024 Annual Rpt-App G.2.8 Tote Road Fish Habitat Moni Rpt-Pt 7-IMRE.pdf	355618
250530-08MN053-2024 Annual Rpt-App G.3 Groundwater Moni Rpt-IMRE.pdf	355545
250530-08MN053-2024 Annual Rpt-App G.4.1 Mary River CREMP Rpt-Pt 1- IMRM.pdf	355547

250530-08MN053-2024 Annual Rpt-App G.4.1 Mary River CREMP Rprt-Pt 2-IMRE.pdf	355548
250530-08MN053-2024 Annual Rpt-App G.4.1 Mary River CREMP Rprt-Pt 3-IMRE.pdf	355549
250530-08MN053-2024 Annual Rpt-App G.4.2 Lake Sedimentation Moni Rpt-IMRE.pdf	355550
250530-08MN053-2024 Annual Rpt-App G.4.3 Milne Inlet Freshwater Fish Health Rpt-Pt 1-IMRE.pdf	355622
250530-08MN053-2024 Annual Rpt-App G.4.3 Milne Inlet Freshwater Fish Health Rpt-Pt 2-IMRE.pdf	355623
250530-08MN053-2024 Annual Rpt-App G.4.3 Milne Inlet Freshwater Fish Health Rpt-Pt 3-IMRE.pdf	355624
250530-08MN053-2024 Annual Rpt-App G.4.3 Milne Inlet Freshwater Fish Health Rpt-Pt 4-IMRE.pdf	355625
250530-08MN053-2024 Annual Rpt-App G.4.3 Milne Inlet Freshwater Fish Health Rpt-Pt 5-IMRE.pdf	355626
250530-08MN053-2024 Annual Rpt-App G.5 Monthly Ice Update-IMRE.pdf	355551
250530-08MN053-2024 Annual Rpt-App G.5.1 TEMP-Pt 1-IMRE.pdf	355552
250530-08MN053-2024 Annual Rpt-App G.5.1 TEMP-Pt 2-IMRE.pdf	355553
250530-08MN053-2024 Annual Rpt-App G.5.1 TEMP-Pt 3-IMRE.pdf	355554
250530-08MN053-2024 Annual Rpt-App G.5.1 TEMP-Pt 4-IMRE.pdf	355555
250530-08MN053-2024 Annual Rpt-App G.6.1.1 Daily Ship Tracks w Ice Imagery-Pt 1-IMRE.pdf	355556
250530-08MN053-2024 Annual Rpt-App G.6.1.1 Daily Ship Tracks w Ice Imagery-Pt 2-IMRE.pdf	355557
250530-08MN053-2024 Annual Rpt-App G.6.1.1 Daily Ship Tracks w Ice Imagery-Pt 3-IMRE.pdf	355558
250530-08MN053-2024 Annual Rpt-App G.6.1.1 Daily Ship Tracks w Ice Imagery-Pt 4-IMRE.pdf	355559
250530-08MN053-2024 Annual Rpt-App G.6.1.1 Daily Ship Tracks w Ice Imagery-Pt 5-IMRE.pdf	355560
250530-08MN053-2024 Annual Rpt-App G.6.1.1 Daily Ship Tracks w Ice Imagery-Pt 6-IMRE.pdf	355561
250603-08MN053-2024 Annual Rpt App G.6.1.2 Daily Ship Tracks w Ice Imagery-Non-Project Vessels Pt 1-IMRE	355724
250603-08MN053-2024 Annual Rpt App G.6.1.2 Daily Ship Tracks w Ice Imagery-Non-Project Vessels Pt 2-IMRE	355725
250603-08MN053-2024 Annual Rpt App G.6.1.2 Daily Ship Tracks w Ice Imagery-Non-Project Vessels Pt 3-IMRE	355726
250603-08MN053-2024 Annual Rpt App G.6.1.2 Daily Ship Tracks w Ice Imagery-Non-Project Vessels Pt 4-IMRE	355727
250603-08MN053-2024 Annual Rpt App G.6.1.2 Daily Ship Tracks w Ice Imagery-Non-Project Vessels Pt 5-IMRE	355728
250603-08MN053-2024 Annual Rpt App G.6.1.2 Daily Ship Tracks w Ice Imagery-Non-Project Vessels Pt 6-IMRE	355729
250530-08MN053-2024 Annual Rpt-App G.6.3 Incidental Marine Mammal Sightings-IMRE.pdf	355562
250530-08MN053-2024 Annual Rpt-App G.6.4 Bruce Head Moni Rpt-Pt 1-IMRE.pdf	355563

250530-08MN053-2024 Annual Rpt-App G.6.4 Bruce Head Moni Rpt-Pt 2-IMRE.pdf	355564
250530-08MN053-2024 Annual Rpt-App G.6.4 Bruce Head Moni Rpt-Pt 3-IMRE.pdf	355565
250530-08MN053-2024 Annual Rpt-App G.6.5 Marine Enviro Effects Moni Rpt-Pt 1-IMRE.pdf	355566
250530-08MN053-2024 Annual Rpt-App G.6.5 Marine Enviro Effects Moni Rpt-Pt 2-IMRE.pdf	355567
250530-08MN053-2024 Annual Rpt-App G.6.5 Marine Enviro Effects Moni Rpt-Pt 3-IMRE.pdf	355568
250530-08MN053-2024 Annual Rpt-App G.6.5 Marine Enviro Effects Moni Rpt-Pt 4-IMRE.pdf	355569
250530-08MN053-2024 Annual Rpt-App G.6.5 Marine Enviro Effects Moni Rpt-Pt 5-IMRE.pdf	355570
250530-08MN053-2024 Annual Rpt-App G.6.5 Marine Enviro Effects Moni Rpt-Pt 6-IMRE.pdf	355571
250530-08MN053-2024 Annual Rpt-App G.6.5 Marine Enviro Effects Moni Rpt-Pt 7-IMRE.pdf	355572
250530-08MN053-2024 Annual Rpt-App G.6.5 Marine Enviro Effects Moni Rpt-Pt 8-IMRE.pdf	355573
250530-08MN053-2024 Annual Rpt-App G.6.5 Marine Enviro Effects Moni Rpt-Pt 9-IMRE.pdf	355574
250530-08MN053-2024 Annual Rpt-App G.6.5 Marine Enviro Effects Moni Rpt-Pt 10-IMRE.pdf	355575
250530-08MN053-2024 Annual Rpt-App G.6.5 Marine Enviro Effects Moni Rpt-Pt 11-IMRE.pdf	355576
250530-08MN053-2024 Annual Rpt-App G.6.6 Year 5 Freight Dock Offset Rpt-IMRE.pdf	355577
250530-08MN053-2024 Annual Rpt-App G.6.7 MMON Summary-IMRE.pdf	355578
250530-08MN053-2024 Annual Rpt-App G.6.8 Project Shipping Levels-IMRE.pdf	355619
250530-08MN053-2024 Annual Rpt-App G.6.9 Rationale For Abundance Estimate for Aerial Surveys-IMRE.pdf	355620
250530-08MN053-2024 Annual Rpt-App G.6.10 Rationale for 5-Yr Enviro Moni Plan-IMRE.pdf	355621
250530-08MN053-2024 Annual Rpt-App G.7.1 Mary River SEMR-IMRE.pdf	355579
250530-08MN053-2024 Annual Rpt-App G.7.2 List of Training Programs-IMRE.pdf	355580
250530-08MN053-2024 Annual Rpt-App G.8 Mgmt Plan Status-IMRE.pdf	355581
250530-08MN053-2024 Annual Rpt-App G.8.1 Oil Pollution Emerg Plan-IMRE.pdf	355582
250530-08MN053-2024 Annual Rpt-App G.8.2 Oil Pollution Preven Plan-IMRE.pdf	355583
250530-08MN053-2024 Annual Rpt-App G.9.1. Cockburn Lake Arctic Char Survey-IMRE.pdf	355584
250530-08MN053-2024 Annual Rpt-App G.9.2. Freshwater Fish & Habitat Survey-IMRE.pdf	355585
250530-08MN053-2024 Annual Rpt-App G.9.3 Lake Bathymetry & Substrate-IMRE.pdf	355586
250530-08MN053-2024 Annual Rpt-App G.9.4 Lake Fish, Benthics & Water Quality-IMRE.pdf	355587
250530-08MN053-2024 Annual Rpt-App G.9.5 LiDAR Survey Rpt-Pt 1-IMRE.pdf	355588

250530-08MN053-2024 Annual Rpt-App G.9.5 LiDAR Survey Rpt-Pt 2-IMRE.pdf	355589
250530-08MN053-2024 Annual Rpt-App G.9.5 LiDAR Survey Rpt-Pt 3-IMRE.pdf	355590
250530-08MN053-2024 Annual Rpt-App G.9.6 Steensby Inlet Bathymetry Ops Rpt-IMRE.pdf	355591
250530-08MN053-2024 Annual Rpt-App G.9.7 Steensby Inlet Fast Ice Study-IMRE.pdf	355592
250530-08MN053-2024 Annual Rpt-App G.9.8. Steensby Inlet Fixed Wing Ice Survey-IMRE.pdf	355593
250530-08MN053-2024 Annual Rpt-App G.9.9. Steensby Port Construction Airborne Noise Modelling-IMRE.pdf	355594
250530-08MN053-2024 Annual Rpt-App G.9.10 Steensby Port Construction Underwater Noise Modelling-IMRE.pdf	355595
250530-08MN053-2024 Annual Rpt-App G.9.11 Ice Conditions & Ship Access to Site-IMRE.pdf	355596
250530-08MN053-2024 Annual Rpt-App G.9.12 Steensby Railway Construction Underwater Noise Modelling-IMRE.pdf	355597
250530-08MN053-2024 Annual Rpt-App G.9.13 Steensby Railway Fish Passage Assmt-IMRE.pdf	355598
250530-08MN053-2024 Annual Rpt-App G.9.14. Steensby Railway Fishbearing Habitat Assmt-IMRE.pdf	355599
250530-08MN053-2024 Annual Rpt-App G.9.15. Steensby Railway Non-Fishbearing Habitat Assmt-IMRE.pdf	355600
250530-08MN053-2024 Annual Rpt-App G.9.16. Steensby Railway Hydro Assmt of Water Withdrawals-Pt 1-IMRE.pdf	355601
250530-08MN053-2024 Annual Rpt-App G.9.16. Steensby Railway Hydro Assmt of Water Withdrawals-Pt 2-IMRE.pdf	355602
250530-08MN053-2024 Annual Rpt-App G.9.16. Steensby Railway Hydro Assmt of Water Withdrawals-Pt 3-IMRE.pdf	355603
250530-08MN053-2024 Annual Rpt-App G.9.17. Steensby Potential Offsetting Site Hab Surveys-Pt 1-IMRE.pdf	355604
250530-08MN053-2024 Annual Rpt-App G.9.17. Steensby Potential Offsetting Site Hab Surveys-Pt 2-IMRE.pdf	355605
250530-08MN053-2024 Annual Rpt-App G.9.18. Arctic Char Otolith Analysis-IMRE.pdf	355606
250530-08MN053-2024 Annual Rpt-App G.9.19. 2021 Marine Fish & Habitat Studies-Pt1-IMRE.pdf	355607
250530-08MN053-2024 Annual Rpt-App G.9.19. 2021 Marine Fish & Habitat Studies-Pt2-IMRE.pdf	355608

APPENDIX B: EXAMPLE TABLE FOR COMMENTS ON THE ANNUAL REPORT

Comment Number:	
Subject/Topic:	
References:	To the appropriate section in the Annual Report and/or Addendum
Comment:	<ol style="list-style-type: none"> 1. Gap/Issue 2. Disagreement with the Annual Report conclusion 3. Reasons for disagreement with the Annual Report conclusion 4. Disagreement and reasons for disagreement with conclusions within the Additional Documents in the Appendix
Conclusion/Request:	