

assessment for future amendment applications and may inform updates to the monitoring program and associated reporting for the approved Mary River Project.

The experience gained by Baffinland and parties to date through the assessment, operation and monitoring of the Project provides valuable insights and creates a unique opportunity for evaluation. While the development of a CEAF is an opportunity to improve Baffinland's future assessment of potential contributions of the Mary River project to cumulative effects experienced in the Qikiqtani region, it may also lead to improvements for the conduct of monitoring programs across Nunavut, the interpretation and communication of monitoring results, and the understanding and mitigation of potential adverse cumulative effects associated with development in Nunavut.

The NIRB will lead the CEAF development through engagement with a new CEAF Steering Committee and informed by a transparent process for public engagement with communities and the general public. The CEAF development process will run independently from the monitoring program under the Mary River Project Certificate and any ongoing assessments, while taking the same into account to the extent practicable when scheduling associated public engagement opportunities.

The development of a CEAF is **not** a reconsideration of the terms and conditions of Project Certificate No. 005 for the Mary River Project pursuant to s. 112 of the *Nunavut Planning and Project Assessment Act* (NuPPAA); should that occur that would be a separate public process that would be addressed by NIRB and the Minister in due course.

Goals and Priorities:

The NIRB hosted a workshop in February 2024 to discuss cumulative effects in relation to the Mary River Project (the 2024 CEAF Workshop). Based on the outcomes of the 2024 CEAF Workshop, Ministerial correspondence, and subsequent discussion with the CEAF Steering Committee, the NIRB has identified the following goals for the development of a CEAF for the Project:

- 1. Improve the assessment of cumulative effects in future amendment applications:** Development of updated cumulative effects assessment guidelines for future amendment applications for the Mary River Project (e.g. adding Deposit 2 and 3 to the current Approved Project) with consideration for the extensive monitoring experience for the Mary River Project and commitments made by the Proponent to update the approach to cumulative effects assessment in the SOP2 amendment application.
- 2. Improve the monitoring, mitigation and management of cumulative effects for the approved Project:** Identification of potential improvements for the monitoring, mitigation and management of cumulative effects through a review of existing cumulative effects assessment conclusions from previous impact assessments for the approved Mary River Project and an evaluation of the existing monitoring program for the Mary River Project. This may include modifications to annual reporting format to more clearly present where monitoring results are compared to impact predictions and, where necessary, outline where cumulative effects may be occurring and develop recommendations for the Mary River Project during the annual NIRB monitoring process.

- 3. Improve the understanding of the contribution of the Mary River Project to overall cumulative effects and environmental trends in the Qikiqtani region.** This could include: informing the development of Government-led or funded regional research and identification of monitoring priorities focusing on the detection of/ understanding of cumulative effects in the Qikiqtani Region; information to support government decision making on future Mary River Project Certificate amendment applications; and, information to support government decision making on projects other than the Mary River Project with the potential to contribute to cumulative effects.

Developing a shared understanding of what is meant by the term “cumulative effects” and other associated impact assessment terminology will be critical to realizing the goals outlined above. Additional priorities for the development of the CEAF include:

- Providing opportunities for community knowledge and Inuit Qaujimagatuqangit to inform and guide an updated CEA for the Mary River Project, including by using appropriate feedback mechanisms, such as through community consultations, periodic check-ins/verification of results, thematic technical meetings, and interim reporting;
- Improving public awareness and confidence in the monitoring outcomes and oversight for the approved Mary River project; and,
- Enhancing the awareness of how cumulative effects are considered within the unique legislative framework of Nunavut for resource development, project assessment and project monitoring.

Governance and responsibilities:

The process for developing the CEAF will be overseen or coordinated by the NIRB, with a new Steering Committee established to assist in finalizing the scope of the initiative, key process steps and deliverables, draft deliverable reviews, timelines and the community engagement approach. The CEAF Steering Committee will consist of key representatives from the following organizations with shared responsibilities for oversight for the Mary River Project and management of cumulative effects contributions from the Mary River Project and other sources in the Qikiqtani region. The members' roles as they relate to the scope of work under the CEAF Steering Committee include, but are not limited to:

- **Baffinland Iron Mines Corporation:** the Proponent of the Mary River Project, responsible for supplying information associated with the impact assessments and monitoring programs for the Project;
- **Nunavut Tunngavik Incorporated:** responsible for ensuring that Inuit rights and relevant provisions in the Nunavut Agreement and supporting legislation are respected and complied with including those pertaining to cumulative effects, project assessment and monitoring;
- **Qikiqtani Inuit Association:** representing the interests of Qikiqtani Inuit with responsibility for managing and protecting significant parts of the Inuit Owned Land where the Mary River Project is located, ensuring consideration of environmental impacts and Inuit Rights with shared oversight responsibilities with Nunavut Tunngavik Inc.;

- **Government of Nunavut:** has responsibilities for conducting both environmental and socio-economic monitoring within its jurisdiction through ongoing data collection, research programs and workshops, chairing regional Socio-economic Monitoring Committees and supporting the Nunavut General Monitoring Program; and
- **Government of Canada:** signatory to the Nunavut Agreement with extensive expertise associated with multiple aspects of impact assessment, environmental and socio-economic monitoring, cumulative effects and project monitoring, with responsibilities for regulatory oversight for the Project across multiple departments.

Steering Committee representatives will be provided with sufficient opportunity to review and comment on draft documents and public engagement plans associated with developing the CEAF prior to publication. As chair of the Steering Committee, the NIRB will keep a record of each Steering Committee meeting, endeavour to build consensus amongst the membership to the extent possible and make the final decision on all related process matters.

While the utilization of a Steering Committee is unique to the development of a CEAF for the Mary River Project, as with all of the NIRB's processes there will be structured opportunities for public engagement and participation throughout, with documentation made available in Inuktitut and English via an online public registry.