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World Wildlife Fund Canada (WWF-Canada) welcomes the opportunity to provide input on the *Discussion Paper in support of the development of a Cumulative Effects Assessment Framework for Baffinland Iron Mine Corp.'s Mary River Project*.

WWF-Canada is the country's largest international conservation organization, and Canada's only international conservation organization with an office in Nunavut. With the active support of more than 150,000 Canadians who care about nature, we help create the conditions to reverse the steep decline of wildlife, at home and internationally.

Over the past four decades, WWF-Canada has dedicated significant time and resources to deepening understanding and raising awareness of the Arctic's vital role in supporting marine biodiversity, communities, and the global climate. WWF-Canada has been actively engaged in providing environmental perspectives on management issues related to Baffinland Iron Mine Corporation's Mary River Project since 2012 and sits as an independent observer on the Marine and Terrestrial Environmental Working Groups.

Before responding to the questions posed in the Discussion Paper, WWF-Canada offers the following comments on the Cumulative Effects Assessment Framework (CEAF) process.

Comments

- **WWF-Canada's position on re-assessment:** NIRB approved the Steensby Component 14 years ago based on environmental studies completed between 2005 and 2012. Since then, climate change has accelerated, and the impacts of industrial development and shipping in the Arctic have become increasingly evident. When the Steensby Component was approved in 2012, the Mary River Iron Mine was only a proposal. Today, however, the scope and scale of the existing operations' impact on ecosystems and wildlife are no longer theoretical. They have been experienced by Inuit for more than a decade and are expected to intensify with construction of the Steensby Component.

The impacts from these two separate projects along with other profound changes across the Canadian Arctic are critical to why **WWF-Canada supports the Hunter and Trapper Organizations (HTOs) that have requested a re-assessment of the Mary River Project's impacts**. For Arviq HTO and the community of Naujaat, a re-assessment would mean having an opportunity to raise their concerns and participate in the review process for the first time. **WWF-Canada's participation in the CEAF process must not be misconstrued as a substitute for this**

position on re-assessing the project, nor does it detract from the Organization's view that all development in Nunavut must uphold Inuit rights, including the right to free, prior, and informed consent.

- **Timelines:** Thirty days does not give adequate time for interested parties to provide comprehensive and meaningful feedback on procedural steps related to the CEAF and Mary River Project. This is especially concerning for the Discussion Paper given the timeframe overlaps with additional requests regarding the Mary River Project (e.g., Environmental Working Group meetings, community information sessions). Therefore, WWF-Canada's comments should be considered as initial, and we urge the NIRB to provide additional time to interested parties to engage in meaningful ways with these processes.
- **Completion before construction:** WWF-Canada holds strongly that for a cumulative effects framework to be effective, it must be completed and integrated *before* permits are approved and *before* construction on the Steensby Component of Baffinland's Mary River Project begins. We urge the NIRB and the Steering Committee to ensure the process is complete and fully integrated into the Mary River Project Certificate before construction on the Steensby Component is allowed to proceed so that the potential cumulative effects of construction and operations can be understood and addressed before work commences.
- **Updated baselines are required:** Baseline conditions should be updated before construction to reflect current pre-Steensby Component conditions to ensure an accurate reference point for assessing future cumulative impacts. As noted on Page 1 of the Discussion Paper, the receiving environment has changed over the course of the Mary River Project's operations. Updated baseline data including, for example, collar data for Baffin Island caribou, can improve outcomes for nature by ensuring appropriate safeguards are in place from the outset, avoiding the risks and costs associated with retroactive action. It will also strengthen trust among stakeholders by signalling that both the proponent and government are prepared to be held accountable. Updated baseline data, especially concerning marine and terrestrial wildlife, will also allow the proponent to contemplate changes to project design and to identify and scale operational measures in accordance with current conditions prior to deploying capital, thereby increasing confidence in project success.
- **Reconsideration of terms and conditions:** The Federal government and NIRB have stated the CEAF "may, over the longer term, trigger a reconsideration of specific terms and conditions of the Project Certificate, if information indicates the existing measures do not adequately meet the objectives of preventing, mitigating, or monitoring cumulative effects." However, the Discussion Paper replaces this language with broader references to how "potential improvements for the monitoring, mitigation and management of cumulative effects" may "potentially inform updates to the monitoring program and associated reporting for the approved Mary River Project". The scope of the CEAF should clearly indicate that a primary function of a cumulative effects assessment is to enable adaptive management and regulatory oversight, including reconsidering project terms and conditions where cumulative effects warrant such action.

Discussion questions

What other sources of research and monitoring information are available to support project-specific cumulative effects assessment and management?

There are several community-led and independent research and monitoring studies that should be reviewed to support project-specific assessment and management. Baffinland-funded research and monitoring need to be supported and complemented by third-party independent studies to avoid a conflict of interest.

How can we improve coordination across governments, proponents, academia and other stakeholders for research and monitoring to inform regional cumulative effects management?

Due to the number of rightsholders and stakeholders contributing to local research and monitoring efforts, it would be prudent to create a database that collects, summarizes and shares all known work in the region, while also respecting Inuit data sovereignty. Such a database would allow all rightsholders and stakeholders to upload relevant research, provide contacts for collaboration, and provide an overview of all regional research to avoid duplication and overlap.

What geographic scale and temporal boundaries are appropriate for the development of the CEAF?

The **geographic scale** of the CEAF should reflect the full range of migratory marine and terrestrial species that may be impacted by the Mary River Mine and its infrastructure, including along the southern transportation route through Foxe Basin and the Hudson Strait. Recognizing that impacts will also be felt by Inuit that rely on the environment and wildlife for their livelihood, nutritional country food, and culture, the **geographic scope of the CEAF should include all communities** that may be affected by the Mary River Project, its component parts, and reasonably foreseeable future development. This should include communities such as Naujaat, which have to date, been left out of the proceedings related to the Mary River Project.

The **temporal scope** of the cumulative effects assessment should be expanded to better reflect the lifespan of the project, reasonably foreseeable future development, and other identified activities. For example, Baffinland repeatedly states that the deposit at Mary River amounts to more than one billion tonnes of the world's highest grade iron ore. With the Steensby Component and current shipping approvals, this volume of ore would be technically impossible to ship by 2045. As such, the temporal scope should better reflect the time needed to extract the promoted ore deposit.

What projects, activities and processes should be considered for development of the CEAF?

- **Port of Churchill expansion:** In addition to the projects and activities listed, the planned expansion of the Port of Churchill should be included due to the cumulative impact of anticipated increases in marine shipping through Hudson Bay and the Hudson Strait.
- **Milne Port as dual-use military infrastructure:** Although military exercises are listed in the Discussion Paper, recent reports of Baffinland offering Milne Port to the Department of National Defence as dual-use infrastructure suggests that both broader military exercises across the region and **the use of Mary River Project infrastructure for military exercises and as a potential installation or base** should be considered during a cumulative effects assessment. The upcoming CEAF workshop is a good opportunity for Baffinland to provide details about its engagement with the DND on Milne Port, what, if any, consultation has taken place or can be expected, and what the company's vision of the port as dual-use infrastructure is.

- **Induced development** is listed in the Discussion Paper in reference to Baffinland's iron ore deposits. Given that the company often highlights its rights to several gold and base metal prospects across North Baffin Island when promoting its land position to investors and the mining industry, these prospects should be included as potential induced development.
- **\$1B Arctic Infrastructure Fund:** Consideration should be given to relevant federal investments, including funding announced in the 2025 federal budget to support trade-enabling transportation infrastructure projects through the establishment of the \$5 billion Trade Diversification Corridors Fund and the \$1 billion Arctic Infrastructure Fund. These investments are relevant because increased construction and shipping in the Canadian Arctic will contribute to cumulative pressures on marine ecosystems.
- **High Seas Treaty:** Baffinland's existing shipping route, as well as the proposed southern shipping route to Steensby Inlet, connect to broader Arctic and international waters. This means the effects on marine biodiversity, particularly migratory species such as narwhal and bowhead whales, extend beyond Canada. In this context, the Agreement on the Conservation and Sustainable Use of Marine Biological Diversity of Areas Beyond National Jurisdiction (BBNJ Agreement) is relevant, as it reflects obligations to consider cumulative, transboundary, and ecosystem-level impacts of activities that increase marine shipping. While Canada has not yet ratified the BBNJ Agreement, its pending ratification signals a clear policy direction. Project approvals that proceed without regard to these principles risk undermining Canada's ability to meet its forthcoming obligations and demonstrate leadership in Arctic marine governance.
- **Ongoing wildlife co-management processes:** Inuit have Constitutional rights to harvest, which must be protected. Several of the narwhal, bowhead, walrus, and caribou populations/management units within the geographic scope of the CEAF are currently subject to Total Allowable Harvest (quota) limitations based on species population dynamics, which introduces a burden to Inuit hunters and communities. Wildlife populations are crucial sources of nutritional food for many people in the north. Ongoing wildlife management processes relating to wildlife populations within the geographic scale should be considered, by coordinating with the Nunavut Wildlife Management Board, to ensure that any cumulative effects on wildlife that result in decreased population levels or that could impede population recovery, are mitigated within the project by the project proponent, rather than being offloaded onto hunters through decreased harvest quotas therefore impacting Inuit harvesting rights.

How should induced development/future phases for the Mary River Project be considered?

Potential induced development of other commodities on Baffin Island, including those for which Baffinland currently holds rights (e.g. gold and base metals) should be included into the mapping of different development scenarios, alongside the full suite of identified iron ore deposits, including deposits 1-9 as referenced on page 40 of the Discussion Paper.

What Valued Components (VCs) should be the focus for development of the CEAF?

- **Marine mammals:** WWF-Canada recommends including bowhead and beluga whales as additional critical VCs, important species across the geographic scale of the cumulative effects assessment.

Underwater noise: Underwater noise is a relevant pathway for cumulative effects. Many marine species rely on sound, and increased shipping and construction activities associated with the Steensby Component of the Mary River Project will alter acoustic conditions. As noise and vibration are recognized stressors, the CEAF should explicitly include underwater noise and acoustic habitat in the marine domain. Inclusion of the underwater soundscape and habitat quality would also supplement “snow and vegetation quality”, “water and sediment quality”, and “sea ice” and help push the VCs past broad categories and **into more directed management outcomes** related to each of the VCs.

- **Inuit culture, resources, and land:** WWF-Canada also recommends a more detailed breakdown of the components included in “Inuit culture, resources and land use” and suggests an explicit inclusion of Inuit harvesting rights and quotas and the nutritional value of country foods in the list of VCs.

Closing Comments

WWF-Canada looks forward to contributing to the development of a CEAF for the Mary River Project. The land and waters surrounding the Mary River Project are essential habitat for many important species, including caribou, narwhal, walrus, and seals. The surrounding area is also home to Inuit who steward the lands and waters and who depend on a healthy environment for their livelihoods, nutritional country food, and cultural practices. Ensuring the effects of the Mary River Project, in combination with other mounting development pressures and the ongoing impacts of climate change are considered holistically is paramount to ensuring the ecological integrity and cultural significance of this region are sustained for generations to come.

We welcome the opportunity for further discussion.

Sincerely,



Paul Okalik
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WWF-Canada