



June 1, 2026

Tara Arko
Director, Operations
Nunavut Impact Review Board
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Dear Ms. Arko:

Re: Discussion Paper to Support Development of a Cumulative Effects Assessment Framework (CEAF) for Baffinland Iron Mines Corporation’s Mary River Project

Nunavut Tunngavik Incorporated (NTI) is writing in response to the Nunavut Impact Review Board’s (NIRB’s) request on April 30, 2026 for feedback on the issued Discussion Paper to support the development of a CEAF. The establishment of the CEAF is a key step towards ensuring that a comprehensive cumulative effects assessment (CEA) is conducted to address gaps related to cumulative effects of the Mary River Project. A comprehensive CEA will allow the entire scope of the Mary River Project as licensed, including the southern transportation route components, to be fully considered. NTI continues to support a full understanding of the existing and potential cumulative effects of the Mary River Project and of the related monitoring and mitigation measures that are necessary to fully mitigate cumulative effects. Critical to the success of the CEAF will be the recognition that a thorough understanding of cumulative effects requires the incorporation of Inuit Qaujimagatuqangit in the identification and mitigation of cumulative effects.

NTI is a member of the Steering Committee for the development of the CEAF. NTI represents the Inuit of Nunavut for the purpose of their rights under the Nunavut Agreement, and other Aboriginal rights and has the responsibility of ensuring that cumulative effects and related obligations in the Nunavut Agreement and the Nunavut Planning and Project Assessment Act (NuPPAA) are fully implemented. As with other aspects of project assessment in the Qikiqtani region, NTI supports the Qikiqtani Inuit Association (QIA), the Hunters and Trappers Organizations (HTOs) and communities generally in addressing issues that are of concern to all Inuit in Nunavut.

NTI supports full Inuit engagement at the upcoming CEAF Workshop on June 9-10, 2026 in Iqaluit and QIA as the primary Designated Inuit Organization (DIO) in the assessment of projects in the Qikiqtani region.





NTI also supports an expanded temporal scope for the CEAF that aligns with QIA submissions set out in the Discussion Paper. NTI agrees that the temporal scope for the CEA should consider how the cumulative impacts of the Mary River Project will continue to be felt, and interact with other impacts, after the closure and decommissioning. NTI supports the QIA recommendation that the end point in time for the CEA should be the point at which impacts caused by the Mary River Project are likely no longer measurable.

3. Identification of projects, activities and processes to be considered

NTI reiterates the comprehensive CEA should evaluate cumulative effects from all sources related to the Mary River Project. This requires considering all project components, including the northern shipping route, Milne Port, the Tote Road, the Milne Mine site, and unconstructed project components such as Steensby Rail, Steensby Port, the southern shipping route, as well as ancillary development such as exploration and roads, as well as other activities and factors such as tourism, increasing number of vessel movements and climate change.

The lengthy passage of time since the approval of the Steensby project components in 2012, without the construction of these project components, requires that the potential effects of these components be assessed as cumulative effects as should the other project components of the Mary River Project. More specifically, the northern components, the Milne Port, the Tote Road and the northern shipping route that are geographically separate from the southern components should all be assessed as contributing to cumulative effects.

NTI has reviewed the Backgrounder Materials for the CEAF Workshop submitted by Baffinland Iron Mine Corporation (BIMC) and recognize that BIMC does not support considering all project components in the CEA. BIMC’s Backgrounder No 1 explains that the potential effects of the construction and operation of Steensby Railway and Steensby Port were assessed as combined with Sustaining Operations Proposal 2 (SOP2) effects, not as cumulative effects. BIMC also explains that the “combine effects” approach to assessing effects within a project is supported by environmental assessment methodology.

NTI recommends that due to the unique circumstances of the Mary River Project that the CEAF direct that project components of the Mary River Project be assessed as cumulative effects, as opposed to combined effects. Factors supporting a cumulative effects approach include:

- the expansive geographic separation between the southern and northern project components;
- the significant gap in time between the approval of the southern Steensby components and their potential construction;



- the documented actual effects of the northern components, particularly considering Inuit Qaujimajatuqangit; and
- the level of Inuit concern regarding both the northern and southern project components.

4. Selection of Valued Components

NTI supports a broader approach to identifying Valued Components (VCs) for a comprehensive CEA and the inclusion of the VCs recommended by QIA and referenced in the Discussion Paper. The final VCs included in the CEAF should also be informed by Inuit engagement and further collection of Inuit knowledge and Inuit Qaujimajatuqangit.

NTI recognizes that the current methodology for CEAs excludes VCs where no residual impact was predicted in the original assessment. Due to concerns with this approach during the 2024 CEAF Workshop, BIMC agreed to carry forward all VCs for the SOP2 amendment application to the subsequent cumulative effects assessment independent of their conclusions about the potential for negative residual effects. As there continues to be significant concerns and documented impacts to various VCs at the community level, NTI recommends that VCs of interest, whether or not they have been assessed to have a residual impact or effect by BIMC, be included in the CEAF.

5. Other identified areas of interest: Incorporation of Inuit Qaujimajatuqangit

NTI is pleased that the Discussion Paper stresses that the development of the CEAF will be grounded in Inuit Qaujimaningit and Inuit Qaujimajatuqangit. NTI stresses that the CEAF must be informed and developed considering Inuit knowledge, and particularly Inuit Qaujimajatuqangit, of all the affected communities and HTOs. The methodology of a comprehensive CEA, and subsequent monitoring and mitigation measures, must directly involve communities and use Inuit Qaujimajatuqangit and western science equally.

Conclusion

The Discussion Paper is a good first step in the development of a CEAF that addresses long-standing Inuit concerns regarding existing impacts of the Mary River Project and cumulative effects. The CEAF Workshop on June 9-10, 2026 is an important opportunity to set a scope and methodology for a comprehensive CEA that will enable the identification of gaps in the assessment of cumulative effects and more effective monitoring and mitigation measures to address ongoing Inuit concerns with the Mary River Project.

NTI looks forward to engaging with NIRB and the other participants at the upcoming CEAF Workshop.

Sincerely,

Dustin Fredlund, Chief Operating Officer