



Tara Arko
Director, Operations
Nunavut Impact Review Board
P.O Box 1360
Cambridge Bay, NU X0B 0C0

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Sent VIA Email: info@nirb.ca

NIRB File #: 08MN053

Re: Discussion Paper to support development of a Cumulative Effects Assessment Framework for Baffinland Iron Mines Corporation's Mary River Project

Hello Tara,

The Government of Nunavut (GN) appreciates the opportunity to provide comments on the development of the Cumulative Effects Assessment (CEA) Framework for the Mary River Project, NIRB File #: 08MN053. The GN supports NIRB's efforts to establish a clear and effective approach to cumulative effects analysis and offers the following considerations to help ensure the framework remains focused, practical, and meaningful for decision-making.

The GN recommends that the scope of the CEA remain targeted, with an emphasis on distinguishing project-specific effects from broader regional changes. A focused scope will help clarify the contribution of the Mary River Project to observed conditions and avoid conflating project effects with unrelated external factors.

The GN further recommends that the CEA examine the combined effects of the various phases of the Mary River Project, including reasonably foreseeable future phases, such as the potential Steensby development. This approach aligns with the purpose of cumulative effects analysis while maintaining a manageable and project-relevant scope.

To support a focused assessment, the GN suggests concentrating on a small number of key valued components (VCs), such as narwhal, caribou, and employment, or on key project activities, such as shipping and trucking, which may help prioritize the most relevant pathways of potential cumulative effects. The GN also recognizes that setting an appropriate baseline will be an important foundation for assessing cumulative effects.

The GN suggests that NIRB works to ensure that the CEA Framework remains appropriately scoped to the Mary River Project. While cumulative effects analysis may consider interactions with other activities, the GN recommends avoiding an overly broad expansion into regional monitoring programs or areas more appropriately addressed through other processes or mandates. Keeping



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the framework focused will help ensure that the assessment remains clear, actionable, and aligned with its project-specific purpose.

Finally, the GN emphasizes the importance of clear, accessible communication and engagement with communities throughout the development and implementation of the CEA Framework. The technical nature of the materials may limit community understanding and participation if not paired with effective outreach. Clarifying the role of communities can help ensure that they can meaningfully engage with the process; this is essential to addressing both the actual and perceived impacts of the Project.

The GN may follow up with additional recommendations to enhance the CEA Framework and community input. The GN appreciates NIRB's continued work on this file and looks forward to ongoing collaboration as the CEA Framework is refined.

Thank you,

Justin Buller
Interim Avatiliriniq Coordinator
Government of Nunavut