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Qikiqtani Inuit Association

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Serving the communities of
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ᑲᖏᕐᖅᑐᒍᓱᒪᖅ Clyde River
ᐊᐅᓚᐅᑎᑦᑎᓂᖅ Grise Fiord
ᐃᓚᒋᑦ Igloolik
ᐃᖁᓗᐃᑦ Iqaluit
ᑭᒥᓕᕐᒥᐅᖅ Kimmirut
ᑭᙵᓗᐃᑦ Kinngait
ᐱᖓᓐᓂᕆᑐᖅ Pangnirtung
ᑎᑎᒪᒋᔪᖅ Pond Inlet
ᖁᑭᖅᑕᕐᔪᐊᖅ Qikiqtarjuaq
ᕆᐅᓴᒋᑦᑎᐊᖅ Resolute Bay
ᓴᓂᓕᐃᓗᐊᖅ Sanikiluaq
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March 19, 2026

Ryan Barry
Nunavut Impact Review Board
P.O. Box 1360 (29 Mitik)
Cambridge Bay, NU X0B 0C0
Email: rbarry@nirb.ca

Subject: QIA Review of Baffinland Backgrounder Documents

Dear Ryan Barry,

The Qikiqtani Inuit Association (QIA) respectfully submits this correspondence in response to the Nunavut Impact Review Board's (the NIRB) request for review of the Backgrounder documents provided by Baffinland Iron Mines Corporation (Baffinland or the Proponent) for the Cumulative Effects Assessment Framework (CEAF) for the Mary River Project. Below please find the results of QIA's review.

A. Cumulative vs. Combined Effects

On page 1 of *Backgrounder No.1: Materials to Support Cumulative Effects EA Guidelines Update for the Mary River Project* (Backgrounder 1), Baffinland states, "[o]ther parties (in particular Baffinland technical advisors) identified that participants tend to use cumulative effects, and combined project effects interchangeably, which is not an approach supported by most literature on environmental assessment methodology." The Proponent is correct in implying that this is not the norm in *project* assessment methodology. For example, "[t]he interrelationship between different environmental effects from a single project on a specific receptor (e.g., how both noise and air quality changes from one project affect a nearby residential area)" is not the normal definition of a cumulative effect insofar as most project-based CEA processes are concerned.

However, from an ecological (and likely IQ) perspective, if two effects (no matter their source—i.e., from the same project or not) affect the same receptor, that effect is *cumulative*. This understanding reflects a *VEC-centered approach*, i.e., the valued ecosystem component (VEC) itself doesn't distinguish between sources. That said, this understanding can be at odds with a project-focused CEA definition. This might need to be clarified by the NIRB, as to the NIRB's underlying notion of cumulative effects and any differentiation they may make between projects and activities.

Consider the example provided by Baffinland: “how both noise and air quality changes from one project affect a nearby residential area.” This is defined by Baffinland as an “intra-project (combined) effect”, rather than a cumulative effect – because they are effects from the same project. This makes sense under typical project CEA methodology.

However, if the VEC is “quality of life”, for example, then the effect is indeed cumulative if we approach CEs from the VEC-based perspective (rather than from the perspective of the project). This may be important when determining the desired scope and approach of the CEAF.

B. Methodology

Backgrounder 1 repeatedly notes that for past assessments, VECs with no predicted project-related residual effects were not carried forward to the CEA since there would be no mechanism for the MRP to contribute meaningfully to regional CEs (page 4). This is indeed standard practice for project CEA. It does assume, however, that the mitigations for those effects will be effective and thus no residual effects will occur, hence the importance of monitoring to ensure that effects are as predicted.

It is noted on more than one occasion that “spatial overlap of effects” was used for determining the potential for cumulative effects. Effects (or disturbances) do *not* need to (literally) spatially overlap to be cumulatively significant – i.e. disturbance of habitat type A at location X does not need to overlap (or interact in any way) with a disturbance of the same habitat type in location Y, if that habitat is supporting habitat for a migratory species or simply regional habitat for a species of concern.

In addition, QIA reiterates its recommendations from prior submissions and the 2024 workshop on the valued ecosystem components, valued socio-economic components, and temporal and geographical boundaries.

CEA must focus on the following valued ecosystem components and valued socio-economic components:

- Narwhal;
- Caribou;
- Ringed seal;
- Inuit Culture, Resources, and Land Use;
- Snow and vegetation quality;
- Water and sediment quality;
- Walrus
- Anadromous arctic char
- Sea ice;

- Public transportation safety;
- Other terrestrial wildlife, and
- Ground / permafrost stability.

The temporal scope of the CEA is framed by the past and future boundaries. The first boundary is in the past, prior to the start of the Project, while the boundary of the future is set at the point when the impacts of the Project are no longer measurable. The geographical boundaries of the CEA include the impacted communities (Mittimatalik (Pond Inlet), Ikpiarjuk (Arctic Bay), Kangitugaapik (Clyde River), Sanirajak, Igloolik, Kimmirut, and Kinngait) inclusive of their travel routes, the range of mobile aquatic and terrestrial wildlife, watersheds where Project effects may be expected, and the Tallurutiup Imanga National Marine Conservation Area.

C. Integrating CEA in Sustaining Operations Proposal 2

On page 3 of Backgrounder 1, the Proponent suggests that it integrated "the updated approach to cumulative effects assessment" in its Sustaining Operations Proposal 2 (SOP2) after the NIRB's 2024 workshop "based on the information and discussions shared during the workshop". QIA notes that the approach for SOP2 as discussed during and immediately after the workshop was for SOP2 to include a "tailored"[1] CEA rather than a comprehensive one, with the aim to develop the latter as a result of a separate NIRB process—the one the Steering Committee is working on now.

QIA encourages the NIRB and the Steering Committee to continue with the development of a truly **comprehensive** CEAF and CEA.

D. Other Considerations

Over the years, QIA provided its submissions to the NIRB for the reconsideration of the Project Certificate and as part of the annual report review. Those submissions contain a wealth of information valuable for shaping a comprehensive CEAF. In addition, in December 2025, QIA submitted a number of studies completed as part of the Inuit Stewardship Plan for the Project. QIA recommends ensuring this feedback is included in the CEAF.

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[1] Chris Spencer (QIA) to Robbin Sinclaire (NIRB), RE: QIA Follow-up to CEA Workshop, dated March 22, 2024.

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