

Arviq Hunters and Trappers Organization
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June 1, 2026

Sent via email: info@nirb.ca

Nunavut Impact Review Board

Dear Nunavut Impact Review Board:

Re Arviq Hunters and Trappers Organization – Preliminary Comments - Discussion Paper to support development of a Cumulative Effects Assessment Framework for Baffinland Iron Mines Corporation’s Mary River Project - NIRB File No.: 08MN053

The Arviq Hunters and Trappers Organization (Arviq HTO) writes to provide the following preliminary comments on the Cumulative Effects Assessment Framework (CEAF) Discussion Paper, dated April 30, 2026.

General comments

1. Arviq HTO has not been invited to participate in previous reviews conducted by the NIRB and the NIRB has never visited Naujaat in respect of the Mary River project or the Steensby project. Arviq HTO has therefore not had time to become familiar with the massive amount of available material, nor with much of the technical information that is mentioned in the Discussion Paper and supporting materials.
2. The Discussion paper and supporting materials are very detailed and technical. Consequently, the 30-day review period is much too short to permit an in-depth review of the material or the implications of what is set out in the materials. Arviq HTO asks for an additional 60 days to review these materials, consult with elders and scientists, and provide more detailed comments on the Discussion paper.

3. Regarding the timelines for the CEAF generally,¹ Arviq HTO is concerned that not enough time has been allocated for the overall CEAF process, particularly for engagement with impacted Inuit hunters, rightsholders and impacted communities. Arviq HTO notes that the NIRB has been developing this complex process internally for a significant amount of time, and has had many months to gain an understanding of available information. Significant time should be granted to Arviq HTO and other Inuit hunters, rightsholders and communities to permit them to review all materials and to participate in an informed manner, given the many other demands on their time.
4. Further time should be built in to the CEAF process to allow Arviq HTO time to gather Inuit knowledge and expertise, and for western scientific reports to help inform a fulsome cumulative effects assessment. More funding should be made available to support these efforts. At present, the CEAF process structure does not allow for detailed submissions, and only provides for comments on draft and final materials prepared by others.
5. Arviq HTO asks the NIRB to conduct a genuine and comprehensive cumulative effects assessment within this process. The NIRB must ensure it does not rely on past processes that excluded Arviq HTO or other impacted communities, and which are incomplete or contain significant information gaps.

Geographical Scope

6. Although several communities are mentioned in documents quoted within the materials, neither Naujaat or the Arviq HTO or many other Foxe Basin communities are mentioned in the list of southern communities that will be impacted by the shipping to and from Steensby Inlet.² While some communities have had some opportunity to communicate concerns, the direct, indirect and cumulative impacts on the Inuit of Naujaat have never factored into any previous reviews. Consequently, reliance on previous reviews is problematic and cannot ground a comprehensive assessment of the impacts and cumulative effects of the Mary River project.

¹ Discussion Paper, page 28.

² Discussion Paper, see list of communities at page 23 of 46, in quote from Qikiqtani Inuit Association (QIA) letter following 2024 workshop.

7. The Marine Regional Study area shown at figure 1 of Baffinland’s Backgrounder No 1³ is incomplete and is not a sound geographical basis for a comprehensive cumulative effects assessment. Notably, the figure excludes Naujaat from consideration, and also excludes all of Repulse Bay, Wager Bay, Frozen Strait, western Foxe Channel, Lyon Inlet, Gore Bay, Duke of York Bay, and Whale Cove, and other nearby marine areas from the proposed Marine study area.⁴ It likewise fails to show Salliq (Coral Harbour) on Southampton Island and communities in Nunavik. Further, in the footnote at page 10, the Backgrounder says that “Figure 1 depicts the geographic boundaries used for the FEIS, ERP, PIP, PIPE, PIP Renewal and SOP.” Naujaat’s exclusion from all of these reviews and assessments demonstrates the inadequacy of past NIRB reviews and again underscores the reality that impacts on the rightsholders of Naujaat were never considered. The Marine Regional Study area must be redrawn and substantially expanded to encompass all impacted communities, including Naujaat.
8. As it is very likely that shipping associated with the southern Steensby route will pass through wintering areas for narwhal and other species, the Marine Regional Study area must extend much farther east and well past the arbitrary eastern boundary shown at Figure1 in Backgrounder No. 1.⁵ For example, significant numbers of Northern Hudson Bay Narwhal winter in Foxe Basin, the eastern Hudson Strait and out into the deep waters of Davis Strait.⁶ The geographical scope of the Marine regional study area must therefore extend into the Davis Strait and encompass narwhal wintering areas.
9. Repulse Bay, Wager Bay, Frozen Strait, Gore Bay, western Foxe Channel, Lyon Inlet, Duke of York Bay, and Whale Cove, and other nearby marine areas, are known summering areas for Northern Hudson Bay Narwhal populations.⁷ As stated above, these areas are excluded from the Marine Regional Study area shown at figure 1 of Baffinland’s Backgrounder No. 1. Given the potential for severe and disruptive impacts on narwhal and on Inuit harvesting rights, particularly by large volumes of

³ Baffinland, **Backgrounder No.1: Materials to Support Cumulative Effects EA Guidelines Update for the Mary River Project**, Figure 1 Marine and Terrestrial Local and Regional Study Areas, page 10

⁴ As discussed below, these areas are all part of the narwhal summer range and key areas in which Inuit rightsholders exercise their hunting rights.

⁵ Backgrounder 1, p. 10.

⁶ [COSEWIC Assessment and Status Report on the Narwhal, 2024](#), Figure 1, page 6, Global range of Narwhal showing summer and winter distributions of the Baffin Bay, Eastern Greenland and Northern Hudson Bay populations, and pages 9 and 12.

⁷ [COSEWIC Assessment and Status Report on the Narwhal, 2024](#), page 12 last paragraph.

shipping traffic, these areas must be included in any cumulative effects assessment conducted in relation to the Mary River project.

10. Narwhal migration pathways, and summer and wintering grounds and habitats, along with migration routes and seasonal habits of many other marine species must all be assessed comprehensively. The current materials demonstrate a lack of understanding of species behaviour, migrations and seasonal habitats, and key areas are excluded, despite their central importance to the exercise of the constitutionally protected harvesting rights of the Inuit of Naujaat and Arviq HTO⁸ and other communities and rightsholders.
11. Arviq HTO agrees with the submission from the Qikiqtani Inuit Association (QIA) to the NIRB following the 2024 CEAF Workshop that recommended the geographic scope of the CEA should include:

“...the entire range of stocks of mobile wildlife species like terrestrial and marine wildlife, and fish, that are known to frequent the potential Mary River Project affected area. The geographic scope should not be limited by current project regional study areas; understanding stressors on these stocks of wildlife throughout their life cycles is critical to understanding their vulnerability to project effects and other cumulative effect causing agents. Such focus on the life cycle health of VCs is a VC-centred CEA approach, which avoids underestimation of total effects on VCs that can be encountered in a Mary River Project-centred CEA.

12. To add to QIA’s submission quoted above, Arviq HTO further says that the “Mary River Project affected area” is not defined in the Discussion Paper. This must be clarified, and not limited to an artificially small area on Baffin Island. As stated above, the affected area for the CEAF must include a full set of life cycle habitats for all seasons and for all impacted marine and terrestrial species.

Temporal scope

13. Arviq HTO agrees with the submission from the Qikiqtani Inuit Association (QIA) to the NIRB following the 2024 CEAF Workshop that further recommended the temporal scope of the CEA should include consideration for how the cumulative impacts of the Mary River Project will continue to be felt, and interact with other impacts, even after the closure and decommissioning. The QIA recommended that

⁸ N. Gonzalez, [Inuit Traditional Ecological Knowledge of the Hudson Bay Narwhal \(Tuugaalik\) Population](#), May 2001.

the end point in time for the CEA should be the point at which impacts caused by the project are likely no longer measurable. QIA also clarified its expectation that the consideration of VCs will adopt appropriate pre-Project baseline condition sets, to allow changes to the environment and Inuit society and culture that occurred prior to the Mary River Project's initiation to be properly understood and integrated.⁹

14. It would take many years, even after the project ends, for species and ecosystems to recover. Consequently the temporal scope of the project must be determined along the lines suggested by QIA above. Baffinland's date range of 1970 to 2045 is much too short a timeframe to assess the cumulative effects of this project.

Projects, activities and processes to be included in the CEAF

15. All the activities listed in section 4.4 of the Discussion Paper must be included in the CEAF.
16. In addition, cumulative shipping impacts associated with the anticipated high volumes of shipping to and from the proposed port on Steensby Inlet must be assessed within the context of **all** shipping that will, or may occur, as other developments in the region are constructed and operated.
17. The plans for development of the Port of Churchill and the associated large increase in shipping volumes from that port are not mentioned in the discussion paper or in Baffinland's materials, or in previous assessments. Development of the Port of Churchill is being aggressively promoted by the Governments of Canada and Manitoba, with talk of it being an operating LNG facility within 4 years.¹⁰ It is imperative that this facility and associated shipping be included in the CEAF and all cumulative effects assessments going forward.¹¹ Likewise, all other proposed future developments, whether or not they are known to Arviq HTO or listed in the Discussion Paper or supporting materials, must also be included and assessed within the CEAF. Likewise, projected international shipping passing through the region, even if not associated with particular regional projects or activities, must also be included in the scope of the CEAF.
18. More generally, impacts and effects from ballast water releases, noise, other shipping-related discharges, air and water pollution, impacts on ice cover and

⁹ Discussion Paper, page 23 final paragraph of section 4.3.

¹⁰ [Canada puts timeline in place for Port of Churchill project: Kinew](#)

¹¹ [Port of Churchill — Arctic Gateway Group; Government of Canada launches market sounding study to strengthen growth at the Port of Churchill - Canada.ca](#)

thickness, and ice dependent species, and other impacts, associated with the massive increase in shipping and ice-breaking through Foxe Basin, Hudson Strait, Davis Strait and within the Steensby Inlet must be included in the CEAF and cumulative effects assessment.

Interrelationships and caribou

19. Arviq HTO is aware of research demonstrating that caribou are sensitive and extremely averse to crossing linear barriers, including roads and railway lines, even though they could physically cross such barriers. Caribou migration pathways will be disrupted and mitigation measures have not been shown to be effective in facilitating caribou crossings. Airborne dust from the mine and handling facilities settling on the landscape may also impact caribou food sources and animal health. More research is needed in all these areas, but Arviq HTO is of the view that it is very likely that caribou populations on Baffin Island will be adversely impacted by the southern railway if it is built and operated. This in turn will cause hunters from the Island to cross to the mainland and hunt herds on which Arviq HTO depends, adversely impacting the harvesting rights of Inuit rightsholders on both Baffin Island and in Naujaat. These complex and interdependent relationships are among the many cumulative impacts that must be included in the cumulative effects assessment.

Climate change

20. Baffinland states that its specific contribution to global carbon emissions will be “undetectable” in the context of planet-wide emissions.¹² The CEAF must take a more nuanced view than Baffinland misses the point of a cumulative effects assessment. Any emitter, large or small can say the same to avoid responsibility for their own emissions, minimizing to the point of absurdity the existential threat of climate change and the Mary River project’s contribution to emissions in Nunavut. In 2018 Baffinland predicted its cumulative emissions would amount to 12.4 Mt CO₂E over a 25-year period.¹³ Over that same period (assuming that Nunavut’s annual emissions remain steady at 0.9 Mt CO₂E)¹⁴ Baffinland’s emissions would then amount to **55%** of

¹² See for example Mary River Project Phase 2 Proposal FEIS Addendum August 2018 Technical Supporting Document TSD27 Cumulative and Transboundary Effects Assessment, at pages 25-26 – referenced as footnote xxiii within the Discussion Paper [TSD27].

¹³ TSD27, at page 25 – Baffinland states: “The Project will generate 12.4 Mt CO₂e cumulative emissions over the LOM (2013 to 2038).”

¹⁴ See [Greenhouse gas emissions - Canada.ca](https://www.ec.gc.ca/greenhouse-gas-emissions-canada-ca) – under the tab “Interactive figures” and “regional” – the “regional” tab indicates Nunavut’s 2025 emissions were 0.9. According to this ECCC data, Nunavut’s

Nunavut's **entire** emissions over that 25-year period. Using this comparison, Baffinland's emissions are very clearly "detectable" and very significant in the region.

21. In the CEAF, the NIRB's task is to assess the overall impacts of all carbon emissions within the region, including those associated with the existing Mary River project and all proposed expansions to this project. These impacts must be assessed within the context of an aggressive push for northern megaprojects and a significant increase in shipping activity in an already rapidly warming region – a region that will experience more dramatic temperature rises than other regions and will feel the adverse impacts even more acutely than other parts of Canada and the world.

Air quality

22. Iron ore dust from the existing Mary river operations has been observed in Sanirajak and Igloolik, arising from current ore handling operations associated with shipping volumes of about 4.2 m.p.t.a of ore. If the southern railway and port at Steensby Inlet are constructed and operated, an additional 18 m.p.t.a will create vastly more iron ore dust in locations much closer to the Foxe Basin communities. In addition to the existing dust from mining operations, and transportation and handling of iron through Milne port, airborne dust will be generated along the railway route and at Steensby Inlet for the first time. It will impact air quality in the Foxe Basin area and could reach as far as Naujaat and beyond. Cumulative impacts on air quality, soil and water, and overall impacts on ecosystems, marine and terrestrial habitats and hunting rights, from deposition of such dust must be included in any assessment.

Valued components

23. Narwhal is a keystone species for Arviq HTO, and must receive significant treatment as a VC, including in relation to its life cycle, habitat, food sources, migration routes and summering and wintering grounds. There are currently no baseline data gathering requirements in the project certificate respecting narwhal in Steensby Inlet, Foxe Basin, Hudson Strait and Davis Strait, despite the potential and significant adverse impacts from port construction and shipping on narwhal populations of central importance to Arviq HTO. Until detailed baseline data is

emissions in 2005 were 0.6 MT per year and in 2013 (the start date of Baffinland's 25 year period) they were still 0.6 per year. The 0.9 MT per annum calculation used for illustration purposes above is therefore a high estimate, and the actual average is likely lower, demonstrating that Baffinland's total emissions could be viewed as having an even higher percentage of Nunavut's total emissions than the 55% figure estimated above.

obtained, a CEAF and cumulative effects assessment will by necessity be incomplete and inadequate.

24. In addition to the other VCs already listed in section 4.5, which Arviq HTO agrees should be studied, it is important to also include beluga whales, walrus, Hudson Bay caribou, the Lorillard caribou herd, barren ground caribou, bowhead whales, arctic char, arctic fox, musk oxen, and ptarmigan. Detailed baseline data must be obtained for all these species in their full ranges before the Steensby project begins construction. Only this will permit effects to be properly assessed set the stage for a fulsome cumulative effects assessment.

The NIRB must not rely on outdated assessments

25. The contents of the Discussion Paper and the Backgrounders demonstrate that the NIRB's intention is to rely heavily on past assessments. However, a particular concern of Arviq HTO is the impacts of construction and operation of the southern railway and the port at Steensby Inlet, and the shipping associated with that port through Foxe Basin, Hudson Strait and Davis Strait. The Steensby project has not moved forward since those initial assessments were done in 2012. Dated studies underlying those assessments cannot be relied on for the CEAF process, and must be updated in accordance with new developments and research. Time and funding must be built into the CEAF process to permit updated research. Unless these studies are properly updated, and data gaps filled, reliance on that outdated work is misplaced and will lead to significant inaccuracy and miscalculation in this CEAF process.

Monitoring cannot be a substitute for a fulsome assessment before work begins

26. The Steensby project has not yet begun, despite the initial assessment which resulted in the 2012 approval. Since work has not started, now is the time to obtain baseline information and conduct comprehensive research, before construction begins. Where knowledge gaps exist, detailed discussions with Arviq HTO and other communities must take place, before irrevocable steps are taken to alter the environment in which their constitutionally protected harvesting rights are exercised. While monitoring of effects and cumulative effects is necessary to determine and enforce compliance of the operating project with the project certificate, by then it is too late to prevent much of the damage from occurring. Only with a comprehensive reconsideration of all the terms and conditions of Project Certificate 005 can there be a chance that serious damage can be prevented before

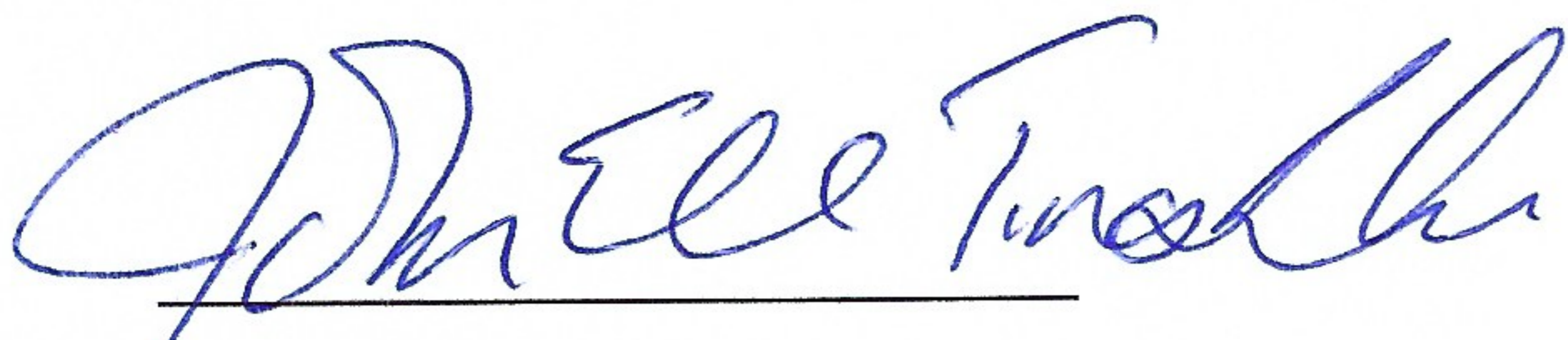
it happens. A meaningful and comprehensive cumulative effects assessment that respects the precautionary approach must take place now so that the true harms associated with this project are assessed and evaluated, before irrevocable steps are taken that harm the environment.

27. Arviq HTO is the steward of its lands, waters and species and is a community of rightsholders under the *Nunavut Agreement*. The NIRB cannot abdicate its current responsibilities and rely solely on future monitoring processes to protect and foster Arviq HTO's harvesting rights, its livelihood and way of life. The only way to prevent harm to its constitutionally protected rights and the species it depends on is to act now to assess the cumulative effects of this project and expansion, and to conduct a full reconsideration of the terms and conditions Project Certificate 005.

Conclusion

As indicated above, at this stage Arviq HTO is only able to provide the above comments, and more time is needed to work through the many issues and complexities of this project and its larger context. We look forward to hearing from the NIRB that it will extend its schedule and grant more time to Arviq HTO and other participants to gather information of relevance and importance for this CEAF process. Arviq HTO will provide more comments when it has had more time to review the materials, gather information, and discuss with elders, hunters and other experts.

Sincerely,



On behalf of Arviq HTO