



## **Compliance monitoring**

Regulatory Authorities, including the Qikiqtani Inuit Association, are also required to provide a compliance update on the following:

- a. Provide a summary of any compliance monitoring and/or site inspections undertaken in association with the Project, including specifically;
  - i. Identify the terms and conditions from the Project Certificate which have been incorporated into any permits, certificates, licenses, or other approvals issued for the Project, where applicable, and report annually to the NIRB on the status of those incorporated terms and conditions;
  - ii. A summary of any inspections conducted during the 2025 reporting period, and the results of these inspections; and
  - iii. A summary of Baffinland's compliance status with regard to authorizations that have been issued for the Project.

NIRB is introducing worksheets to support the collection of feedback on the Annual Report. The NIRB document number associated with the worksheet is [361875](#), which can be downloaded from the Public Registry.

NIRB encourages regulators, responsible parties, and relevant authorities to provide a summary of their comments using this worksheet format. While the worksheet is the preferred method for submitting feedback, parties may use the [Appendix B](#) table format if additional space or an alternative format is required.

The worksheet contains tables summarizing the applicable Terms and Conditions from relevant project certificates. It has also been shared with Proponents and includes the Proponents' summaries of actions taken to meet compliance requirements for each Term and Condition, along with references to where supporting information can be found in the 2025 Annual Report.

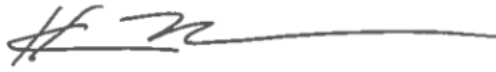
Within the worksheet, each party is provided with its own column to enter comments. NIRB requests that parties identified as responsible parties for specific Terms and Conditions provide their comments in their respective columns. Where a party is identified as a responsible party, a response is required for each corresponding Term and Condition. Parties who are not listed as responsible parties but wish to provide input are still encouraged to do so within the worksheet. If a party determines that no column has been provided for them, they may insert an additional column and submit the updated worksheet to NIRB.

This information is important to assist the NIRB assess, coordinate, integrate, and ensure that the Board has the information to accurately measure effects, adequately assess compliance with terms and conditions, regulatory instruments, and agreements, and whether the Projects are carried out in accordance with the terms and conditions as set out in the project certificate.

Please send all forthcoming submissions directly to the NIRB via email at [info@nirb.ca](mailto:info@nirb.ca).

Questions regarding the NIRB's monitoring process can be directed to the undersigned at [kmorrison@nirb.ca](mailto:kmorrison@nirb.ca).

Sincerely,



Keith Morrison  
Manager, Project Monitoring  
Nunavut Impact Review Board

cc: Lou Kamermans, Baffinland Iron Mines Corporation  
Meagan Lord-Hoyle, Baffinland Iron Mines Corporation  
Cortney Oliver, Baffinland Iron Mines Corporation

Attachments (2): Appendix A: NIRB Public Registry Document ID Numbers  
Appendix B: Example Table for Comments on Annual Report

## APPENDIX A: NIRB DOCUMENT ID NUMBERS

The 2025 Annual Report and supplemental documents for the Mary River Project are available on the NIRB’s public registry at <http://www.nirb.ca/project/125767>.

Documents can be accessed by:

- Selecting the “Documents Tab” of the Project Dashboard(s) then select the “Annual Report” category on the left pane.
- Selecting “Recent Documents” on the Project Dashboards; or
- Searching the Public Registry with the Document ID numbers

[<http://www.nirb.ca/project/125767> →Project Dashboard → Documents tab → Annual Reports]

Documents	Document ID
260529-08MN053-2025 Annual Report-IR2E	361583
260529-08MN053-2025 Annual Report App A.1 2025 General Regulatory Table-IR2E	361515
260529-08MN053-2025 Annual Report App A.2 2025 PC Conditions Table-IR2E	361517
260529-08MN053-2025 Annual Report App B.1 Engagement Records-IR2E	361518
260529-08MN053-2025 Annual Report App B.2 Shipping Szn Presentations Pt1-IR2E	361537
260529-08MN053-2025 Annual Report App B.2 Shipping Szn Presentations Pt2-IR2E	361538
260529-08MN053-2025 Annual Report App B.2 Shipping Szn Presentations Pt3-IR2E	361539
260529-08MN053-2025 Annual Report App B.2.1 Shipping Fact Sheet-IR2E	361519
260529-08MN053-2025 Annual Report App B.3 Steensby Component Engagement Records-IR2E	361520
260529-08MN053-2025 Annual Report App B.3.1 Federal Tour Follow Up Ltr-IR2E	361521
260529-08MN053-2025 Annual Report App C.1 MEWG Meeting Minutes-IR2E	361522
260529-08MN053-2025 Annual Report App C.2 TEWG Meeting Records-IR2E	361523
260529-08MN053-2025 Annual Report App C.3 SEMWG Meeting Summary-IR2E	361524
260529-08MN053-2025 Annual Report App C.4 QSEMC Presentation-IR2E	361525
260529-08MN053-2025 Annual Report App D Photo Essay-IR2E	361526
260529-08MN053-2025 Annual Report App E BIM Response to Comments 2024 AR-IR2E	361527
260529-08MN053-2025 Annual Report App F PC Commitments Implementation Tracker-IR2E	361528
260529-08MN053-2025 Annual Report App G.1.1 2025 Air Quality Report-IR2E	361529
260529-08MN053-2025 Annual Report App G.1.2 Incinerator Stack Testing Report-IR2E	361530
260529-08MN053-2025 Annual Report App G.1.3 Noise and Vibration Rpt Pt1-IR2E	361531
260529-08MN053-2025 Annual Report App G.1.3 Noise and Vibration Rpt Pt2-IR2E	361532
260529-08MN053-2025 Annual Report AppG.1.4 Geotechnical Inspection Rpt & BIM Response-IR2E	361533
260529-08MN053-2025 Annual Report App G.1.5 Tote Road Priority Actions-IR2E	361534
260529-08MN053-2025 Annual Report App G.1.6 Tote Road Fish Habitat Monitoring Pt1-IR2E	361542
260529-08MN053-2025 Annual Report App G.1.6 Tote Road Fish Habitat Monitoring Pt2-IR2E	361543
260529-08MN053-2025 Annual Report App G.1.6 Tote Road Fish Habitat Monitoring Pt3-IR2E	361544
260529-08MN053-2025 Annual Report App G.1.6 Tote Road Fish Habitat Monitoring Pt4-IR2E	361545
260529-08MN053-2025 Annual Report App G.1.6 Tote Road Fish Habitat Monitoring Pt5-IR2E	361546
260529-08MN053-2025 Annual Report App G.1.6 Tote Road Fish Habitat Monitoring Pt6-IR2E	361547

260617-08MN053-2025 Annual Report App G.1.7 2025 S1 Industrial Hygiene Monitoring Report-IT6E	361878
260617-08MN053-2025 Annual Report App G.1.7 2025 S2 Industrial Hygiene Monitoring Report-IT6E	361879
260529-08MN053-2025 Annual Report App G.2 Groundwater Monitoring Report Pt.1-IR2E	361557
260529-08MN053-2025 Annual Report App G.2 Groundwater Monitoring Report Pt.2-IR2E	361558
260529-08MN053-2025 Annual Report App G.2 Groundwater Monitoring Report Pt.3-IR2E	361559
260529-08MN053-2025 Annual Report App G.2 Groundwater Monitoring Report Pt.4-IR2E	361560
260529-08MN053-2025 Annual Report App G.2 Groundwater Monitoring Report Pt.5-IR2E	361561
260529-08MN053-2025 Annual Report App G.2 Groundwater Monitoring Report Pt.6-IR2E	361562
260529-08MN053-2025 Annual Report App G.2 Groundwater Monitoring Report Pt.7-IR2E	361563
260529-08MN053-2025 Annual Report App G.2 Groundwater Monitoring Report Pt.8-IR2E	361564
260529-08MN053-2025 Annual Report App G.2 Groundwater Monitoring Report Pt.9-IR2E	361565
260529-08MN053-2025 Annual Report App G.2 Groundwater Monitoring Report Pt.10-IR2E	361566
260529-08MN053-2025 Annual Report App G.2 Groundwater Monitoring Report Pt.11-IR2E	361567
260529-08MN053-2025 Annual Report App G.3.1 CREMP Rpt Pt1-IR2E	361548
260529-08MN053-2025 Annual Report App G.3.1 CREMP Rpt Pt2-IR2E	361549
260529-08MN053-2025 Annual Report App G.3.2 Lake Sedimentation Monitoring Pt1-IR2E	361550
260529-08MN053-2025 Annual Report App G.3.2 Lake Sedimentation Monitoring Pt2-IR2E	361551
250530-08MN053-2024 Annual Rpt-App G.4.3 Milne Inlet Freshwater Fish Health Rpt-Pt 1-IMRE	355622
250530-08MN053-2024 Annual Rpt-App G.4.3 Milne Inlet Freshwater Fish Health Rpt-Pt 2-IMRE	355623
250530-08MN053-2024 Annual Rpt-App G.4.3 Milne Inlet Freshwater Fish Health Rpt-Pt 3-IMRE	355624
250530-08MN053-2024 Annual Rpt-App G.4.3 Milne Inlet Freshwater Fish Health Rpt-Pt 4-IMRE	355625
250530-08MN053-2024 Annual Rpt-App G.4.3 Milne Inlet Freshwater Fish Health Rpt-Pt 5-IMRE	355626
260529-08MN053-2025 Annual Report App G.4.1 TE Annual Monitoring Rpt Pt1-IR2E	361552
260529-08MN053-2025 Annual Report App G.4.1 TE Annual Monitoring Rpt Pt2-IR2E	361553
260529-08MN053-2025 Annual Report App G.4.1 TE Annual Monitoring Rpt Pt3-IR2E	361554
260529-08MN053-2025 Annual Report App G.4.1 TE Annual Monitoring Rpt Pt4-IR2E	361555
260529-08MN053-2025 Annual Report App G.4.1 TE Annual Monitoring Rpt Pt5-IR2E	361556
260529-08MN053-2025 Annual Report App G.4.2 - Reclamation Pilot Study Pt1-IR2E	361568
260529-08MN053-2025 Annual Report App G.4.2 - Reclamation Pilot Study Pt2-IR2E	361569
260529-08MN053-2025 Annual Report App G.4.2 - Reclamation Pilot Study Pt3-IR2E	361570
260529-08MN053-2025 Annual Report App G.4.2 - Reclamation Pilot Study Pt4-IR2E	361571
260529-08MN053-2025 Annual Report App G.4.2 - Reclamation Pilot Study Pt5-IR2E	361572
260529-08MN053-2025 Annual Report App G.4.3 2014-2025 Incidental Caribou Sightings-IR2E	361573
260529-08MN053-2025 Annual Report App G.4.4 Dust Audit Committee-IR2E	361574
260529-08MN053-2025 Annual Report App G.5.4 MMON Season Summary-IR2E	361575
260529-08MN053-2025 Annual Report App G.5.5 NIRB Shipping and Vessel Mngmt Rpt-IR2E	361576
260529-08MN053-2025 Annual Report App G.6.2 List of Training Programs-IR2E	361577
260529-08MN053-2025 Annual Report App G.7 2025 Management Plan Updates-IR2E	361869
260529-08MN053-2025 Annual Report App G.8.1 2021 2024 RSASP Pt1-IR2E	361578
260529-08MN053-2025 Annual Report App G.8.1 2021 2024 RSASP Pt2-IR2E	361579
260529-08MN053-2025 Annual Report App G.8.1 2021 2024 RSASP Pt3-IR2E	361580
260529-08MN053-2025 Annual Report App G.8.2 - Steensby Rail Summary Rpt-IR2E	361581
260529-08MN053-2025 Annual Report App G.8.3 - Bathymetry Survey Ops and MMO Rpt-IR2E	361582

## APPENDIX B: EXAMPLE TABLE FOR COMMENTS ON ANNUAL REPORT

<b>Comment Number:</b>	
<b>Subject/Topic:</b>	
<b>References:</b>	To the appropriate section in the Annual Report and/or Addendum
<b>Comment:</b>	<ol style="list-style-type: none"><li>1. Gap/Issue</li><li>2. Disagreement with the Annual Report conclusion</li><li>3. Reasons for disagreement with the Annual Report conclusion</li><li>4. Disagreement and reasons for disagreement with conclusions within the Additional Documents in the Appendix</li></ol>
<b>Conclusion/Request:</b>	