

Keith Morrison
Manager, Project Monitoring
Nunavut Impact Review Board
Sent via email to info@nirb.ca

July 30, 2026

Dear Mr. Morrison,

World Wildlife Fund Canada (WWF-Canada) welcomes the opportunity to provide input on Baffinland Iron Mine Corporation's (Baffinland) Mary River Project 2025 Annual Report. WWF-Canada has been actively engaged in providing environmental perspectives on management issues related to the Mary River Project since 2012 and sits as an independent observer on the Marine and Terrestrial Environmental Working Groups.

WWF-Canada notes that the limited timelines provided for review, alongside overlapping project-related activities, do not allow for a comprehensive review of the Annual Report. Instead, using the provided table, WWF-Canada offers the below comments on targeted issues of concern.

Comment Number:	1
Subject/Topic:	Missing 2025 Reports
References:	- Appendix G.5.1 2025 Daily Ship Tracks with Ice Imagery - Appendix G.5.1.1 2025 Daily Ship Tracks with Ice Imagery – Project vessels - Appendix G.5.1.2 2025 Daily Ship Tracks with Ice Imagery – Non-project vessels - Appendix G.5.2 2025 Bruce Head Shore-based Monitoring Program Report - Appendix G.5.3 2025 Marine Environment Effects Monitoring Program Report
Comment:	The Annual Report frequently directs readers to the above appendices for more information. However, these reports have not yet been published, making it difficult to properly assess and review the monitoring efforts referenced in the Annual Report. Sending these reports out for public comment after comments are due on the Annual Report, as suggested by the NIRB, is inconsistent with previous reporting periods and an ineffective approach to project monitoring.
Conclusion/Request:	To support an efficient and informed review process, requests for comment should be deferred until all appendices and supporting documents are available, or the review period should be extended to allow concurrent consideration of all relevant project information.

Comment Number:	2
Subject/Topic:	Updated Management Plans for Steensby Railway and Port
References:	Shipping and Marine Wildlife Management Plan (SMWMP; Baffinland, 2022d)
Comment:	It is noted that Baffinland is currently in the process of updating the SMWMP "to include the construction phase of Steensby prior to any winter shipping" (p. 311). Past Environmental Working Group meetings have also noted that various management plans for the construction and operational phases of the Steensby

	railway and port are being updated and developed. However, the status of these management plans remains unknown, making it difficult to assess these plans against the project's terms and conditions.
Conclusion/Request:	WWF-Canada requests clarification on the status and anticipated release dates of the management plans for the Steensby Component and expects these plans to be made available for public review and comment well in advance of the commencement of construction activities.

Comment Number:	3
Subject/Topic:	Vessel Activity Reporting
References:	Project Certificate Term and Condition No. 105 (p. 324)
Comment:	Throughout the Annual Report, total vessel activity is reported as individual ore carrier round trip voyages, and not as independent one-way transits, making it difficult to determine the true level of vessel presence and associated disturbance within the RSA. To WWF-Canada's knowledge, Baffinland does not provide standardized information on the composition of their convoys, making it difficult to assess the company's own targets (a 15% reduction of independent one-way transits through the RSA) and/or if the use of convoys is in fact a genuine reduction in vessel activity. WWF-Canada is particularly concerned that convoying could be used to increase shipping activity while appearing to maintain or reduce the number of reported transits. Given that the Project Certificate establishes limits on vessel transits, clear and transparent reporting is needed to ensure that transit numbers reflect actual vessel movements and associated environmental pressures, rather than changes in how vessels are grouped together and counted. WWF-Canada also expresses skepticism regarding the environmental benefits attributed to convoying in this context. In reporting on T&C 105, Baffinland describes convoying both as a means to "reduce total sound exposure" and as a "mitigation method to reduce the number of vessel transits through the RSA." With respect to underwater noise, convoying is a traffic management measure that alters the timing and distribution of vessel activity. Any resulting environmental benefit depends on factors such as convoy composition, vessel spacing, speed, timing, and how individual species respond to acoustic disturbance. It is further noted that Baffinland's application of convoying results in ships idling outside the RSA, which can contribute to additional ocean noise, pollution, and emissions. However, Baffinland has previously indicated that convoying is implemented on an opportunistic basis, and little information is publicly reported regarding convoy structure or operation, making it difficult to evaluate whether convoying achieves a measurable conservation benefit. This is especially concerning considering there are no measures in place to ensure that convoying does not overlap with the timing of critical biological processes, like migration, calving or feeding. WWF-Canada is also concerned by claims that convoying reduces the number of

	vessel transits through the RSA. Convoying changes how vessels travel, not how many vessels travel. If multiple vessels within a convoy are being reported as a single transit, then convoying does not reduce the number of vessels operating within the RSA. Any claimed reduction in transits should therefore be clearly explained and supported by transparent reporting of convoy activity.
Conclusion/Request:	Convoying should not be used to reduce reported transit numbers. WWF-Canada requests clarity on how Baffinland identifies, counts, monitors, and reports convoys including the number of individual vessels in each convoy, the timing and duration of each convoy, vessel spacing, route, speed, and any deviations from planned convoy procedures. WWF-Canada further requests that NIRB require Baffinland to demonstrate that convoying produces a measurable reduction in total disturbance to marine wildlife, rather than functioning as a way to move more vessels through the RSA under a lower reported transit count.

Comment Number:	4
Subject/Topic:	Steensby Operation
References:	Performance on general terms and conditions (p. 57)
Comment:	Baffinland states that it “has received the necessary approvals from NIRB to construct and operate the Steensby Components and the Early Revenue Phase”. This phrasing implies plans to continue operating the Early Revenue Phase out of Milne Port once Steensby is <i>operational</i> , which appears to contradict the Project Certificate. The Project Certificate states that “18 Mt/a of iron ore will be transported by Railway and shipped from Steensby Port” and that “once Steensby Port is operational, Milne Port will only be used occasionally for the delivery of oversized equipment for the Mine Site”. While amendments to the Project Certificate (No. 005) add that the ERP is to run in conjunction with the Mary River Project as originally proposed, it is WWF-Canada’s understanding that the ERP was to be temporary and capped and there are no Terms and Conditions that authorize combined or cumulative shipping volumes beyond what is provided for operations out of Steensby (242 transits per year).
Conclusion/Request:	WWF-Canada requests clarification from Baffinland regarding the intended role of Milne Port should the Steensby railway and port become operational. WWF-Canada further requests that NIRB clarify the regulatory implications of a scenario in which iron ore is transported through both Milne Port and Steensby, including any additional review, assessment, or approvals that may be required.

Thank you again for the opportunity to provide these comments on Baffinland’s 2025 Annual Report. WWF-Canada welcomes the opportunity for further discussion.

Sincerely,



Paul Okalik
Lead Specialist, Arctic
WWF-Canada