

Environmental Protection Operations Directorate
Prairie & Northern Region
5019 52nd Street, 4th Floor
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Yellowknife, NT X1A 2P7

ECCC File: 6100 000 011/001
NIRB File: 08MN053



July 31, 2026

via email at: info@nirb.ca

Keith Morrison
Manager, Project Monitoring
Nunavut Impact Review Board
29 Mitik Street
P.O. Box 1360
Cambridge Bay, NU X0B 0C0

Dear Keith Morrison:

RE: 08MN053 – Baffinland – Mary River Mine – 2025 Annual Report Review

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Impact Review Board (NIRB) regarding the above-mentioned Review.

ECCC provides expert information and knowledge to project assessments on subjects within the department's mandate and within federal jurisdiction, including greenhouse gas emissions and climate change, air quality, water quality and quantity, migratory birds, species at risk, environmental emergencies preparedness and response, and climate and meteorology. This work includes reviewing proponent's characterization of environmental effects and proposed mitigation measures, and providing information and knowledge to decision-makers on activities needed to mitigate these environmental effects within federal jurisdiction. Any comments received from ECCC in this context does not relieve the proponent of its obligations to respect all applicable federal legislation.

Please note that ECCC has reviewed the annual report in consideration of species at risk under the *Species at Risk Act*, migratory birds under the *Migratory Birds Convention Act*, air quality, spills and environmental emergencies, and has not reviewed in consideration of water quality or mining issues. The absence of comments on the latter topics is not an indication of an absence of concerns from ECCC.



The following comments are provided:

1. Spill Cause Details

Reference(s)

- 260529-08MN053-2025 Annual Report-IR2E, Table 4:3, p.60
- 260331 2AM-MRY2540 - 2025 QIA-NWB Annual Report for Ops - Appendix E.8.3 - 2025 Initial and Followup Spill Reports-ILAE

Comment

While Table 4:3 provides high-level descriptions of reported spill events, the information presented does not clearly describe the circumstances, causal factors, or sequence of events that led to each release (e.g., a forklift puncturing a tote and causing a complete release of its contents onto the ground).

The provision of additional contextual information regarding spill events would support a more robust assessment of accidents and malfunctions, including the adequacy and effectiveness of mitigation, corrective action, and adaptive management measures implemented by the Proponent. ECCC notes that more detailed descriptions of spill incidents were provided in Appendix E.8.3 of the Qikiqtani Inuit Association (QIA) and Nunavut Water Board (NWB) Annual Report for Operations. Given the value of this information for understanding causes and response effectiveness, ECCC considers it important that similar information be submitted as part of the NIRB review process and future reporting.

As currently presented, it is difficult to fully understand how the spill events occurred and to assess whether appropriate corrective actions and preventative measures have been implemented to reduce the likelihood of similar incidents in the future. As noted by the Proponent in Section 4.5.2, spill information reported to the Northwest Territories–Nunavut (NT–NU) Spill Report Line is publicly available; however, those records contain limited information and generally provide little additional context beyond what is already included in Table 4:3.

ECCC Recommendation(s)

ECCC recommends that the Proponent provide additional contextual information for all reported spill events, consistent with practices observed for other major projects (e.g., the Meliadine Mine Project), including:

- A brief description of the sequence of events and circumstances that resulted in the release;
- The immediate and underlying causes of the incident, where known;
- The response measures implemented to contain and remediate the spill; and
- Any corrective or preventative actions taken to reduce the likelihood of recurrence.

The information provided in Appendix E.8.3 of the QIA and NWB Annual Report for Operations has the level of detail to allowed for a meaningful assessment of the response measures undertaken following each incident. Inclusion of comparable information in future annual reporting would support a more comprehensive understanding of accident and malfunction

events and facilitate the assessment of the effectiveness of mitigation measures and continual improvement efforts.

Alternatively, the Proponent could provide copies of, or equivalent information contained within, the spill incident summaries submitted as part of the QIA and NWB Annual Report for Operations.

2. Mary River Eco Waste Incinerator Stack Testing Results

Reference(s)

- 2025 Source Testing Report, Eco Waste Incinerators, Milne Port and Mary River, Nunavut

Comment

ECCC appreciates the efforts involved with incinerator stack testing. While both incinerators passed the mercury test and the Milne Port incinerator passed the dioxins and furans test, the results for the Mary River incinerator show concentrations over three times the criteria threshold. The report speculates that the Mary River incinerator was loaded with more waste than the Milne Port Incinerator and hence may have been the reason for the measured high D/F/DLPCB levels. However, Appendix E Process Data shows that the average estimated mass for Milne Port at 1503 kg was comparable to the average estimated mass for Mary River at 1624 kg, and Test 1 for Milne Port at 1773 kg was higher than each of the 3 tests for Mary River. Comparing the stack gas characteristics for the D/F/DLPCB tests show that the dry carbon monoxide concentrations were lower for the Mary River incinerator than the Milne Port incinerator, but the ratios don't address the differences in the in-stack D/F/DLPCB concentrations. With other stack parameters being quite similar, it's likely that differences in the source waste characteristics are the cause of the differences in the results.

ECCC Recommendation(s)

ECCC requests that an investigation into the contents of the waste for the Mary River incinerator be performed including the possible accidental inclusion of plastic cutlery and any other plastics.

If you need more information, please contact Melissa Pinto at (867) 445-5384 or Melissa.Pinto@ec.gc.ca.

Sincerely,

Anna Graham
Environmental Assessment Officer

Attachment(s): 2025 Annual Report Comment Request Worksheet - ECCC

cc: Eva Walker, Head, Environmental Assessment North (NT and NU)