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

Aug. 3, 2026

Sent VIA Email: info@nirb.ca

NIRB File #: 08MN053

Re: Comment Request for Baffinland Iron Mines Corporation's (Baffinland) Mary RiverProject 2025 Annual Report

Hello Keith,

The Government of Nunavut (GN) thanks the Nunavut Impact Review Board (NIRB) for the opportunity to review Baffinland Iron Mines Corporation's 2025 Annual Report for the Mary River Project, NIRB File #: 08MN053.

The GN has reviewed the annual report materials and is pleased to provide the attached comments for the Board's consideration. The GN's comments focus on select monitoring programs related to mitigating impacts on caribou. In particular, the GN identifies outstanding questions related to snow track and height of land surveys, helicopter flights, wildlife reporting, winter dust monitoring approaches, and planned studies associated with Steensby development.

The GN appreciates participating in the review of this project through NIRB's monitoring process. Should there be any concerns or need for follow-up, please feel free to contact me at jfbuller@gov.nu.ca.

Thank you,

Justin Buller
Interim Avatiliriniq Coordinator
Government of Nunavut

GN AR # 01	
Department	Environment
Organization	Government of Nunavut

Subject/Topic	• Project Certificate No. 005, Amendment 05:
	  ○ Terms and Conditions: 49, 50, 53, 54, 57, and 58
	• Sustaining Operations Proposal:
	  ○ Commitment: 15

References	• Baffinland Iron Mines Corporation. 2025 Annual Report to the Nunavut Impact Review Board: Appendix G.4.1 TE – Mary River Project Terrestrial Environment 2025 Annual Monitoring Report. (June 2026). • Baffinland Iron Mines Corporation. 2024 Annual Report to the Nunavut Impact Review Board: Appendix G.5.1 – Mary River Project Terrestrial Environment 2024 Annual Monitoring Report. (March 2025). • Baffinland Iron Mines Corporation. 2023 Annual Report to the Nunavut Impact Review Board: Appendix G.5.1 – Mary River Project Terrestrial Environment 2023 Annual Monitoring Report. (March 2024). • Baffinland Iron Mines Corporation. 2022 Annual Report to the Nunavut Impact Review Board: Appendix G.5.1 – Mary River Project Terrestrial Environment 2022 Annual Monitoring Report. (April 2023). • Campbell, M., Boulanger, J., Ringrose, J., Shoftstall, K., Waldinger, J., Fredlund, M. & Greene, E. 2025. Aerial Abundance Estimates and Trends of the Barren-ground Caribou (Rangifer tarandus groenlandicus) of Baffin Island Nunavut – March 2024 and 2025. Government of Nunavut, Department of Environment, Technical Report Series. No: 02-2025. 134 pp. • Government of Nunavut. Government of Nunavut Comments on the Mary River Project 2023 Annual Report. (July 2024). • Government of Nunavut. Government of Nunavut Comments on the 2024 Annual Report for the Mary River Project. (July 2025).
IDENTIFICATION OF ISSUE	

The Government of Nunavut (GN) has reviewed Baffinland Iron Ore Mines' (Proponent) Terrestrial Environment – 2025 Annual Report (2025 Wildlife Report), and notes that the GN's previous concerns and recommendations remain unaddressed. The GN considers these issues particularly important given evidence of increased caribou presence near the Mary River Project (Project).

IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE

The 2024 and 2025 Wildlife Reports provide evidence that caribou presence near the Project may be increasing, which is consistent with the GN's own 2024/2025 survey of Baffin Island caribou, which found a general population increase (Campbell et al., 2025). For example, the 2025 Wildlife Report found that:

> "An estimated 27 individual caribou were observed during Height of Land surveys, the highest count since 2013." (Baffinland, 2026, p. viii).

If caribou are beginning to interact more frequently with the Project, monitoring programs designed to detect and assess these interactions should be refined and enhanced to ensure they collect the most useful data possible and effectively trigger mitigation actions where appropriate.

The GN recommended several changes to the Project's snow track survey study design in its reviews of the Proponent's 2023 and 2024 Wildlife Reports (GN, 2024; GN, 2025). While the Proponent incorporated some of these recommendations into the 2024 Wildlife Report, the GN notes that several recommendations have not been adopted and remain outstanding following its review of the 2025 Wildlife Report.

Detection Range

Section 9.1.1 of the 2025 Wildlife Report outlines the data collected for each animal track observed during surveys. However, the 2025 Wildlife Report does not provide the distance from the road at which each track was first detected. The GN previously requested this additional information because recording detection distance is important for assessing whether the road-based survey methodology has a sufficient detection range to adequately evaluate species-specific responses to the road (GN, 2024, 2025).

The GN remains concerned that caribou and other wildlife tracks within the zone of influence (ZOI) may be missed, resulting in an underestimation of potential road-related impacts. Consideration should be given to incorporating aerial drone surveys to expand the effective search area and complement road-based observations.

Presentation/Assessment of Interannual Trends

Figures 9-2 and 9.3 summarize the number of tracks observed by species across years. However, the GN notes that the data presented in these figures do not account for variation in survey effort either within or between years. The exclusion of this information

impacts the interpretation of interannual trends. For example, the 2025 Wildlife Report states that,

> "Nine surveys [were] completed after recent snowfall between February and November 2025" (Baffinland, 2026, p. 206)

This differs from previous years:

Year	# of Snow Track Surveys*	Range	Reference
2024	12	February–November	Baffinland, 2025, p. 122
2023	6	March–November	Baffinland, 2024, p. 149
2022	4	March–November	Baffinland, 2023, p. 212

**Completed after recent snowfall*

As noted previously (GN, 2024, 2025), variable survey effort over time can create the appearance of changes in animal presence near the Project when the differences actually reflect the number of surveys conducted. Adjusting observations for survey effort would improve comparability across months and years and help avoid inaccurate conclusions about wildlife trends.

Frequency of snow track surveys

Commitment 15 under the Sustaining Operations Proposal states,

> "Baffinland will implement snow track surveys and will make best efforts to conduct them at a frequency of once per week along the Tote Road during the 2023/2024 snow cover seasons when environmental conditions permit the surveys to be conducted effectively and safely. The conditions criteria include fresh snowfall (within last 48 hours) and suitable light conditions. The results of these surveys are to be reviewed by the TEWG following completion of the 2023/2024 snow cover season for potential alterations. [Note survey condition criteria will be the ultimate driver of the number of surveys conducted each month and may be less than the frequency of once per week and due to darkness will not generally be possible in January and February]." (NIRB, 2023)

However, as noted above, the targeted weekly snow track survey frequency was not achieved, with only nine surveys completed in 2025. Maintaining an adequate monitoring frequency is particularly important if caribou are beginning to interact more frequently with the Project.

REQUEST(S)/RECOMMENDATION(S)

The GN recommends that the Proponent undertake the following:

1. Record the distance of each track from the road at the time of first observation. This information should be summarized by species in future annual reports.

2. Augment all ground-based observational surveys with aerial drone-based surveys to search for tracks further away from the road but within its zone of influence within each survey location.

3. Present snow track frequency data adjusted for survey effort and month.

4. Increase the frequency of snow track surveys (e.g., to weekly).

GN AR # 02	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	• Project Certificate No. 005, Amendment 05: ○ Terms and Conditions 49, 50, 53, 54, 57, and 58
References	• Agnico Eagle Mines. Meadowbank Complex – 2025 Annual Report: Appendix 36 Meadowbank and Whale Tail 2025 Wildlife Monitoring Summary Report. (March 2026). • Baffinland Iron Mines Corporation. 2025 Annual Report to the Nunavut Impact Review Board: Appendix G.4.1 TE – Mary River Project Terrestrial Environment 2025 Annual Monitoring Report. (June 2026). • Baffinland Iron Mines Corporation. 2024 Annual Report to the Nunavut Impact Review Board: Appendix G.5.1 – Mary River Project Terrestrial Environment 2024 Annual Monitoring Report. (March 2025). • Campbell, M., Boulanger, J., Ringrose, J., Shoftstall, K., Waldinger, J., Fredlund, M. & Greene, E. 2025. Aerial Abundance Estimates and Trends of the Barren-ground Caribou (Rangifer tarandus groenlandicus) of Baffin Island Nunavut – March 2024 and 2025. Government of Nunavut, Department of Environment, Technical Report Series. No: 02-2025. 134 pp. • Government of Nunavut. Government of Nunavut Comments on the 2024 Annual Report for the Mary River Project. (July 2025). • Owen-Smith, N., Fryxell, J. M., & Merrill, E. H. (2010). Foraging theory upscaled: The behavioural ecology of herbivore movement. Philosophical Transactions of the Royal Society B: Biological Sciences, 365 (1550), 2267–2278. https://doi.org/10.1098/rstb.2010.0095
IDENTIFICATION OF ISSUE	
The GN notes similar concerns related to Height of Land (HOL) surveys and road observations as described in previous annual report comment submission.	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	

The Project uses HOL surveys and on-the-ground monitoring to examine how caribou respond to Project-related activities and infrastructure. The 2025 Wildlife Report provides an overview of these activities, stating:

> "Caribou occurrences at or near the PDA are monitored through HOL surveys (refer to Section 9.3) during the caribou calving period and through on-the-ground monitoring through continual incidental sightings (often by haul truck drivers; refer to Section 9.6). Where caribou are observed on or near the Tote Road, the caribou decision framework (Figure 9-9) comes into effect and guides the action of road users (Baffinland Iron Mines Corporation 2023c). Site personnel are informed of the caribou decision framework and trained to respond appropriately to these scenarios. Concurrently, Baffinland Environment Staff are notified of near-Project observations and complete follow-up behavioural monitoring." (Baffinland, 2026, p. 230)

Additionally, the 2025 Wildlife Report states that for HOL surveys:

> "If caribou were observed, the survey team monitored behaviour following established protocols described in the 2013 Annual Monitoring Report (Baffinland Iron Mines Corporation 2019). Depending on the number of caribou, observations were made as either a scan or focal sample (Martin and Bateson 1993)." (Baffinland, 2026, p. 219)

HOL Surveys – No Behavioural Data

The 2025 Wildlife Report states that an estimated 27 caribou were observed in the Potential Development Area (PDA) during the HOL surveys in 2025. However, no behavioural data were provided by the Proponent for these observations. No explanation is provided explicitly by the Proponent for the absence of this information. The GN flagged this in response to the 2024 Wildlife Report (GN, 2025); however, the Proponent has not revised reporting efforts.

Road Observations – No Behavioural Data & Behavioural Definitions

The 2025 Wildlife Report states that:

> "Thirty-two incidental observations of caribou during 26 monitoring events were recorded along the Tote Road in 2025 by Baffinland staff during regular operations and travel between HOL stations during HOL surveys. As shown in Figure 9-10, most caribou observations (18) occurred in June; additional observations occurred in April (2), May (6), July (2), August (3), and October (1). Caribou were observed as near as 20 m from the Tote Road (Photo 9-11 and Photo 9-12). No adverse behaviour towards the Tote Road or passing vehicles was noted during the 26 monitoring events, though one individual was noted to be running across the Tote Road. Other behaviours noted included foraging/feeding, bedded animals, and animals travelling at a 'walking pace'. (Baffinland, 2026, p. 231)

Similar to the above, no behavioural data were provided by the Proponent for these observations apart from this high-level summary.

As previously commented on by the GN (GN, 2025), this summary demonstrates that the Proponent does not categorize walking or other behaviours noted as a potential behavioural response to Project activities. However, caribou behaviour studies at other mining projects in Nunavut have demonstrated increases in walking amongst caribou as they approach infrastructure or when traffic passes, suggesting that walking is in part an adverse response (Agnico Eagle, 2026).

For these reasons, and given the absence of an assessment of "normal" activity budgets for Barren-ground caribou, the GN believes that adjustments to the Project's behavioural monitoring methods are needed to collect additional information. This information would help determine whether walking and other behavioural activities identified in the peer-reviewed literature represent responses to disturbance or reflect normal, undisturbed behaviour.

For example, the GN see value in the Proponent conducting a thorough review of seasonal barren-ground caribou activity budget/time budget studies (Owen-Smith et al., 2010) to compare activity length for undisturbed caribou to use as a benchmark for the Proponent's behavioural findings.

This information will help the GN evaluate the effectiveness of the mitigations, monitoring and management being implemented by the Proponent to avoid or limit impacts to caribou. It will also help the GN and other stakeholders effectively assess potential disturbance impacts with the proposed new infrastructure within the currently important caribou seasonal range towards Steensby Inlet.

REQUEST(S)/RECOMMENDATION(S)

The GN requests that the Proponent undertake the following:

1. Provide a clear explanation for the lack of behavioural data from the HOL observations in light of known associations of similar behaviour to disturbance.

The GN recommends that the Proponent undertake the following:

2. Amend relevant behavioural monitoring methods for HOL surveys and follow-up behavioural monitoring to collect additional information on caribou walking and other behaviours as ‘toward’, ‘parallel to’, or away from Project disturbance (e.g., infrastructure and mine-related activities).

3. Establish a benchmark based on peer-reviewed literature for normal undisturbed barren-ground caribou activity budgets and directly compare to the behavioural

data collected with the requested amended relevant behavioural monitoring methods.

GN AR # 03	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	• Project Certificate No. 005, Amendment 05: ○ Terms and Conditions: Terms and Conditions 49, 50, 53, 54, 57–59, 71 and 72
References	• Baffinland Iron Mines Corporation. 2025 Annual Report to the Nunavut Impact Review Board: Appendix G.4.1 TE – Mary River Project Terrestrial Environment 2025 Annual Monitoring Report. (June 2026). • Baffinland Iron Mines Corporation. 2024 Annual Report to the Nunavut Impact Review Board: Appendix G.5.1 – Mary River Project Terrestrial Environment 2024 Annual Monitoring Report. (March 2025). • Campbell, M., J. Boulanger, J. Ringrose, K Shoftstall, J. Waldinger, M. Fredlund, and E. Greene. 2025. Aerial Abundance Estimates and Trends of the Barren-ground Caribou (Rangifer tarandus groenlandicus) of Baffin Island Nunavut – March 2024 and 2025. Government of Nunavut, Department of Environment, Technical Report Series. No: 02-2025. 134 pp. • Government of Nunavut. Government of Nunavut Comments on the Mary River Project 2023 Annual Report. (July 2024). • Government of Nunavut. Government of Nunavut Comments on the Mary River Project 2024 Annual Report. (July 2025).
IDENTIFICATION OF ISSUE	
Upon reviewing the 2025 Wildlife Report, the GN has concerns regarding the Proponent's helicopter flight activities, similar to those that the GN has articulated in annual reports from previous years. The GN considers it essential for the Proponent to demonstrate concrete actions aimed at improving compliance and minimizing the negative impacts of aircraft activity on caribou and other wildlife.	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	

The 2025 Wildlife Report provides evidence that caribou presence near the Project may be increasing, which is consistent with the GN's own 2024/2025 survey of Baffin Island caribou, which found a general population increase (Campbell et al., 2025). Given this, reducing disturbance from Project-related helicopter traffic should become a priority. After reviewing helicopter flight data presented in the 2025 Wildlife Report, the GN notes the following:

Non-compliant Flights

The 2025 Wildlife Report states that:

> "Overall, compliance in all areas between June and September 2025 was 34.15% compliant, 43.45% compliant with rationale, and 22.41% non-compliant (Table 5-5, Map 5-1 to Map 5-4)…Non-compliant flights followed defined flight corridors to work areas and monitoring sites such as Bruce Head, Steensby Inlet, surrounding lakes, and survey sites (Map 5-1 to Map 5-4)." (Baffinland, 2026, p. 27)

And

> "Non-compliant flights decreased to 22.4% in 2025, lower than 2024 but remaining higher than the period between 2018 and 2023 (3.8% to 8.4%)" (Baffinland, 2026, p. 36)

Despite the lower number of hours flown in 2025 (relative to some previous years), compliance has decreased in 2024 and 2025, in comparison to the previous 5 years of the Project (2018 to 2023). The 2025 Wildlife Report does not explain this reduced compliance, although it is noted that many of the non-compliant flights are in corridors between work and monitoring sites, such as mine-port routes.

The GN seeks further explanation as to why flight compliance was not increased in 2025 back to the former levels. In particular, it is unclear why flights between Project work sites, such as the port and mine, are consistently non-compliant. The 2025 Wildlife Report notes that:

> "Baffinland will continue to work with Canadian Helicopters to document cruising altitude compliance and communicate elevation requirements and protocols to pilots throughout the flying season." (Baffinland, 2026, p. 33–34)

The GN notes that these are the same measures implemented in previous years (e.g., Baffinland, 2025, p.32–33). The GN would like information on what additional measures, beyond the standard briefings and other information provided to pilots, the Proponent will take in 2026 to raise compliance.

Short Distance Flights

Helicopter flights that are below the Project Certificate's altitude minimums are considered compliant if an acceptable rationale is provided by the pilot. The list of acceptable rationales is summarized in Table 5-7 of the 2025 Wildlife Report. Like previous years, one of the most common rationales provided by pilots in 2025 was that

flights were short distances, thus making it impractical to fly above the minimums required by the project certificate. Short distance is defined as:

> "At the discretion of the pilot operating the aircraft during the flight. Considers the distance travelled during a flight as well as other contributing factors, which may result in a determination that gaining an altitude of 650 magl is unreasonable, unsafe, or impractical." (Baffinland, 2026, p. 33)

In 2025, 11.23% of flight hours were classified as 'compliant with rationale' because they were short-distance flights (Baffinland, 2026, p. 35; Table 5-7). This was the second most common rationale, next to weather-related reasons (22.63%). The GN maintains that this rationale requires further scrutiny, given its discretionary nature.

Flight Corridors Concerning Caribou

Concerning the flight corridors for avoiding areas of significant wildlife importance, section 5.3.1 of the report states that:

> "Only the key moulting area for Snow Geese was identified for helicopter avoidance in 2025. No locations or boundaries of areas prescribed explicitly by the TEWG or areas of observed concentrations of other migratory birds were identified in 2025." (Baffinland, 2026, p. 26)

As outlined in GN responses to the Proponent's past annual reports (GN, 2024, 2025), it remains a significant concern to the GN that, as of the 2025 Wildlife Report, and after more than a decade of operations, the Proponent has not undertaken any revisions to its helicopter flight corridors, as required under Project Certificate Term and Condition 59. The Project now has access to over 10 years of flight data, alongside current and robust information on caribou distribution from incidental observations, HOL surveys, remote camera data, recent aerial surveys (e.g., Section 9.5, Baffinland, 2025), recent aerial abundance estimates (Campbell et al., 2025) and the GN's collaring program—all of which are available to the Proponent.

Given the availability of this information, a review of the current flight corridors is warranted and should be conducted in collaboration with the TEWG to ensure that helicopter traffic avoids areas of high caribou use. Failure to apply these data toward improving mitigation measures represents inadequate compliance with Term and Condition 59 and is inconsistent with the Proponent's stated commitment to adaptive management.

REQUEST(S)/RECOMMENDATION(S)

The GN requests that the Proponent undertake the following:

1. Explain what additional measures, beyond the standard briefings and other information provided to pilots, will be implemented in 2026 to raise compliance with helicopter flight altitude minimums.

2. Collect and analyze helicopter flight altitude data at regular intervals throughout the helicopter-use season to identify issues with compliance and implement corrective measures in near real-time where possible and/or within the same season.

3. In future annual reports, the Proponent should provide a further breakdown of flight hours and routes classified as ‘compliant with rationale’ due to their short distance. Specifically, identifying (a) flights involving frequent take-off and landings for ground-based sampling/monitoring or; (b) low-level aerial survey; versus (c) flights that required only one take-off and landing but were deemed by pilots to be too short to gain altitude above the minimums specified in the Project Certificate.

4. In future annual reports, the Proponent should provide tabular information on flights classified as ‘short distance’ (thus ‘compliant with rationale’). These tables should provide the mean, median, minimum and maximum distances of flights. The same metrics should be reported for the period 2013 to 2025.

5. In collaboration with the TEWG, initiate an evaluation of the Project’s helicopter flight corridors in relation to caribou distribution and movement patterns. This assessment should incorporate Inuit Qaujimajatuqangit and Inuit Qaujimaningit, as well as recent scientific data from incidental observations, HOL surveys, remote camera monitoring, aerial surveys, and satellite telemetry (collaring) data. The TEWG should work to identify areas of high caribou importance and determine ways to ensure these areas can be effectively avoided by adjusting flight corridors and associated no-fly zones (except for emergencies).

GN AR # 04	
Department	Environment
Organization	Government of Nunavut

Subject/Topic	• Project Certificate No. 005, Amendment 05:
	  ○ Terms and Conditions: 49, 51, and 57
	• Production Increase Proposal Renewal:
	  ○ Commitments: 5 Igloolik HTA-1, 75 GN-1

References	• Baffinland Iron Mines Corporation. Appendix G.5.1 – Mary River Project Terrestrial Environment 2024 Annual Monitoring Report. (March 2025). • Baffinland Iron Mines Corporation. 2025 Annual Report to the Nunavut Impact Review Board: Appendix G.4.1 TE – Mary River Project Terrestrial Environment 2025 Annual Monitoring Report. (June 2026a). • Baffinland Iron Mines Corporation. Mary River Project Steensby Railway: Soil, Vegetation, and Wildlife Field Reconnaissance from the Mine Site to KM40/Ravn River. (January 2026b).

IDENTIFICATION OF ISSUE

Based on the GN's review of the Proponent's 2025 Wildlife Report, 2025 Mary River Project Steensby Railway Report (Railway Report) and the Proponent's response to comments on the 2024 Annual Report, it remains unclear to the GN what additional terrestrial environment and wildlife studies are planned before the commencement of construction at Steensby.

IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE

In response to the 2024 Annual Report, the GN stated that it was unclear what terrestrial baseline information would be updated before construction of the Project's Steensby components (e.g., rail and port) (GN, 2025). The GN also noted that this concern was shared by other parties (e.g., NIRB 2023, 5 Igloolik HTA-1).

The Proponent's response to the GN's comment on the 2024 Annual Report, as well as this year's Railway Report, indicated similar information. Specifically, the Railway Report states:

> "To inform construction planning and refinement of environmental mitigations during construction and operations, EDI Environmental Dynamics Inc. (EDI) was

> retained to conduct vegetation and soil ground-truthing and wildlife habitat reconnaissance surveys along the Steensby Railway to supplement previous baseline studies and (where applicable) update documentation of existing conditions. Reconnaissance surveys were completed August 5–20, 2025, and focused on the 40 km segment of the Steensby Railway alignment from the Mary River Mine Site to KM40/Ravn River (2025 Southern Alignment Study Area). (Baffinland, 2026b, p.1).

However, it remains unclear whether the Proponent intends to extend these ground-truthing and reconnaissance surveys for the remainder of the ~174 km Steensby Railway alignment.

Additionally, the Railway Report states,

> "Sixty-eight trails or trail fragments were detected during the 2025 wildlife reconnaissance survey within the first 40 km of the Steensby Railway alignment (2025 Study Area, Map 3, Photo 7 to Photo 10). This represents a higher detection rate within the 40 km Study Area than the 53 trails detected along the total 174 km Steensby Railway alignment between 2006 and 2010." (Baffinland, 2026b, p.17).

In the GN's view, these findings suggest that the 2006–2010 surveys may not have been sufficient to characterize caribou use of the proposed Steensby Railway alignment and further support the need for baseline work to ensure that routing decisions and associated impacts are fully considered and appropriately addressed.

Additional baseline studies could include telemetry data. The GN notes that the 2025 Wildlife Report states,

> "Baffinland is collaborating with the GN to support caribou collaring; 30 additional collars will be added to the program in 2026. Collaring will occur in March/April of 2026. As more collars are deployed and more data are collected, Baffinland will continue to evaluate and analyse ground-based monitoring data to inform interactions between caribou and the Project." (Baffinland, 2026a, p. 242)

The GN recognizes that Baffinland has made meaningful contributions toward regional caribou monitoring initiatives during the reporting period, consistent with the Commitment 75 GN-1 (Production Increase Proposal Renewal) and TC #51. However, Baffinland has not indicated in the 2025 Wildlife Report or the Railway Report how it will use these newer collar data to update the Steensby baseline information, or whether it will collect supplementary baseline information (e.g., reconnaissance surveys).

REQUEST(S)/RECOMMENDATION(S)

The GN requests/recommends that the Proponent undertake the following:

1. Provide a detailed update on whether the remaining ~174 km Steensby Railway alignment will be surveyed or if supplementary baseline information will be collected.

2. Clarify what specific studies regarding impacts to barren-ground caribou are planned, and how these study results will be used to offset impacts to caribou movement and use of essential seasonal range, including but not limited to early, mid, and late-winter and spring range.

GN AR # 05	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	• Project Certificate No. 005, Amendment 05: ○ Terms and Conditions: 49, 50, 53, 54, 57, and 58
References	• Baffinland Iron Mines Corporation. 2025 Annual Report to the Nunavut Impact Review Board: Appendix G.4.1 TE – Mary River Project Terrestrial Environment 2025 Annual Monitoring Report. (June 2026).

IDENTIFICATION OF ISSUE

Snowbank height monitoring is important to the GN's monitoring of the Project, as snowbanks could act as a barrier to wildlife movement, which can vary across the winter months from freeze-up to melt. Per the content of the 2025 Wildlife Report, the GN has concerns regarding the methods, sampling frequency and dates.

IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE

Section 9.2.1 of the 2025 Wildlife Report describes the methods used by the Proponent to measure snowbank heights and manage exceedances. This section indicates that once per month, height measurements are taken at up to 50 randomized locations along the Tote Road. At each location, two measures are taken (east-side and west-side) at the edges of the roadbed. The Proponent states that large piles of snow are pushed back and redistributed ("feathered") to minimize their height.

The GN notes that the Proponent has stated in the 2025 Wildlife Report that they "would like to discuss changes to snowbank height monitoring with the TEWG for input." (Baffinland, 2026, p. 203). The GN is supportive of this as a future topic for TEWG input but wishes to articulate some preliminary thoughts.

First, it is unclear whether monthly monitoring is sufficient to accurately characterize snowbank heights. Snow conditions can change rapidly due to snowfall, wind, and melt events, and monthly measurements may not capture conditions that could impede caribou movement.

Second, the GN is concerned that elevated roadbeds promote downwind snow drifting, creating snowbanks that can impede caribou movement during periods of soft snow, particularly in the spring melt and early fall and winter. These conditions may also

create predator chokepoints, potentially affecting caribou movement and behaviour and contributing to seasonal range fragmentation. As such, measuring only the roadbed, without also monitoring the extent and characteristics of adjacent snowbanks, is insufficient to assess these potential effects.

REQUEST(S)/RECOMMENDATION(S)

The GN requests/recommends that the Proponent undertake the following:

1. Increase the frequency of snowbank height monitoring to more than once per month (e.g., weekly or biweekly).
2. Measure snow-depth cross-sections extending at least 250 m perpendicular to both sides of the Tote Road to characterize downwind snow accumulation patterns.
3. Continue monitoring until a minimum five-year snow-depth dataset has been collected. The results should be analyzed, averaged where appropriate, and discussed in relation to their potential effects on wildlife in the area.

GN AR # 06	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	N/A
References	• Baffinland Iron Mines Corporation. 2025 Annual Report to the Nunavut Impact Review Board: Appendix G.4.1 TE – Mary River Project Terrestrial Environment 2025 Annual Monitoring Report. (June 2026). • Baffinland Iron Mines Corporation. 2024 Annual Report to the Nunavut Impact Review Board: Appendix G.5.1 – Mary River Project Terrestrial Environment 2024 Annual Monitoring Report. (March 2025).

IDENTIFICATION OF ISSUE

The GN notes that portions of the text in the 2025 Wildlife Report are identical to those in the 2024 Wildlife Report, creating uncertainty as to whether the information has been updated and is accurate.

IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE

Both the 2024 and 2025 Wildlife Reports state identical information:

“Incidental Observations — Two incidental observations of three caribou occurred near the Mine Site, and 97 observations (possibly repeated observations) occurred along the Tote Road. Forty-three caribou were noted outside the PDA.

Hunter and Visitor Logs — Baffinland Security monitors land use and the presence of land users in the PDA via hunter and visitor logs that document travel or hunting within the PDA. Overall log numbers slightly decreased from 2022 but were similar to 2018 and above pre-COVID counts.” (Baffinland, 2025, p.120 and Baffinland, 2026, p. 204)

As such, it is unclear whether the content in the 2025 Wildlife Report has been updated and is accurate.

REQUEST(S)/RECOMMENDATION(S)

The GN requests that the Proponent revise the 2025 Wildlife Report to correct the information presented or clarify it where it is accurate but may be subject to misinterpretation.

GN AR # 07	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	• Project Certificate No. 005, Amendment 05: ○ Terms and Conditions: 36, 49, 50, 53, 54, 57, 58, 187, and 188
References	• Baffinland Iron Mines Corporation. 2025 Annual Report to the Nunavut Impact Review Board: Appendix G.4.1 TE – Mary River Project Terrestrial Environment 2025 Annual Monitoring Report. (June 2026). • Chen, W., Gough, W. A., Chen, J. M., & Gagnon, A. S. (2017). Does dust from Arctic mines affect caribou forage? Journal of Environmental Protection, 8(3), 258–276. https://doi.org/10.4236/jep.2017.83020 • Government of Nunavut. Government of Nunavut Comments on the Mary River Project 2024 Annual Report. (July 2025). • Watkinson, A. R., Poole, K. G., Gagnon, A. S., Gough, W. A., & Chen, W. (2021). Effects of dust deposition from diamond mining on subarctic plant communities and barren-ground caribou forage. Journal of Environmental Quality, 50(5), 990–1003. https://doi.org/10.1002/jeq2.20251

IDENTIFICATION OF ISSUE

Despite previous commitments by the Proponent to increase sampling efforts for the snow sampling pilot study during periods of cloud-free skies, no useable data were collected in 2025. The GN views this study as an essential component for the monitoring and assessment of wildlife responses to the Project. Further information is sought as to why, for the first year since the study began, no useable data were collected despite commitments to improving sampling.

IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE

Studies from other Arctic mines have shown that caribou forage quality and quantity are affected by project-related dust fall (e.g., Chen et al., 2017; Watkinson et al., 2021). In

2022, the Proponent initiated a pilot study to measure dust concentrations on the surface of snow around the Project and correlate these with a satellite-derived index of dust concentration referred to as the Snow Darkening Index (SDI). The advantage of directly measuring dust concentrations on snow rather than relating passive sampling dust fall station data to the SDI is that, unlike snow dust concentration, passive sampling (and the dust model used in the Project's Final Environmental Impact Statement (FEIS)) does not account for dust that is re-distributed by wind after it has initially fallen to the ground. Thus, passive sampling (and modelling) will tend to underestimate the true spatial extent of dust distribution originating from the Project (Baffinland, 2026, Section 7.4.1.6). Additionally, establishing a relationship between dust concentrations on snow and a remote-sensing modality provides a powerful landscape-level tool for accurately monitoring dust originating from anthropogenic sources; a tool that may support wildlife effects monitoring for species such as caribou.

Table 7-1 of the 2025 Wildlife Report summarises updates to the dust fall monitoring program since the Project began. The updates for 2024 state:

> "To increase the number of samples for the snow sampling pilot study, as recommended by the QIA and the GN (QIA DF #11 and GN AR #5; Baffinland Iron Mines Corporation 2024), improvements to sample collection were implemented, including (1) using satellite acquisition dates and footprints to plan sampling dates and locations, (2) extending the sampling period to late May, (3) sampling on cloud-free days, and (4) sampling a variety of dust concentrations." (Baffinland, 2026, p. 47)

Despite this commitment by the Proponent, the 2025 Wildlife Report notes that:

> "Surface snow samples were collected on days with mostly cloudy conditions, leaving no usable satellite imagery (>90% cloud cover) for comparison with SDI values. Clouds obscure the ground in the imagery which prevents the calculation/extraction of the SDI values. Therefore, there are no SDI values in 2025 to compare with the samples. In future, sampling protocols will emphasize review and cross-referencing weather conditions to better align with satellite data requirements." (Baffinland, 2026, p. 102)

The GN appreciates that logistics, weather conditions and other factors may prevent data collection but reiterates comments on the 2024 annual report regarding the importance of this pilot program (GN, 2025). Given the previous commitment to coordinate snow sampling with cloud-free days, the GN wishes to understand why no useable data were collected in 2025 despite commitments to improve coordination. This is the first year without useable data since the pilot study began.

REQUEST(S)/RECOMMENDATION(S)

The GN recommends that the Proponent undertake the following:

1. Provide further explanation about why no useable data were collected in 2025 for the Snow Sampling Pilot Study despite commitments to improve sampling methods.

2. Establish targets for future seasons for the number of snow samples collected that can be compared to a satellite-derived SDI.

GN AR # 08	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	• Project Certificate No. 005, Amendment 05: ○ Terms and Conditions: 36, 49, 50, 53, 54, 57, 58, 187, and 188
References	• Baffinland Iron Mines Corporation. 2025 Annual Report to the Nunavut Impact Review Board: Appendix G.4.1 TE – Mary River Project Terrestrial Environment 2025 Annual Monitoring Report. (June 2026). • Chen, W., Gough, W. A., Chen, J. M., & Gagnon, A. S. (2017). Does dust from Arctic mines affect caribou forage? Journal of Environmental Protection, 8(3), 258–276. https://doi.org/10.4236/jep.2017.83020 • Government of Nunavut. Government of Nunavut Comments on the Mary River Project 2024 Annual Report. (July 2025). • Watkinson, A. R., Poole, K. G., Gagnon, A. S., Gough, W. A., & Chen, W. (2021). Effects of dust deposition from diamond mining on subarctic plant communities and barren-ground caribou forage. Journal of Environmental Quality, 50(5), 990–1003. https://doi.org/10.1002/jeq2.20251

IDENTIFICATION OF ISSUE

The 2025 Wildlife Report describes patterns of dust distribution around the Project that do not seem to reflect the results of satellite-based dust monitoring. Additionally, the report concludes that dust distribution in 2025 was largely within predicted limits; a conclusion that is not supported due to incompatibilities in the measures of dust fall presented.

IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE

Studies from other Arctic mines have shown that caribou forage quality and quantity are affected by project-related dust fall (e.g., Chen et al., 2017; Watkinson et al., 2021). The GN thus reviews project-related monitoring of dust as an important component of wildlife monitoring.

After reviewing the 2025 Wildlife Report, the GN notes the following:

Long Range Dust Plumes

Section 7.4.1.5 of the 2025 Wildlife Report details the satellite-based SDI correlated with passive dust fall sampling station data and presents information on the concentration and extent of dust distribution around the Project. The 2025 Wildlife Report states that:

> "Trends in dust fall extent and concentration around Project infrastructure (e.g., Milne Port, Map 7-3 and Map 7-4) suggest that the primary source of dust is related to mining operations, as expected…dust fall at the Mine Site area extended to the northwest and southwest, reflecting the predominant winds from the southeast to northeast and uncommon but strong easterly winds (Map 7-3 and Map 7-4; Section 4). The dust fall extent was within the predicted annual dust fall extents, except to the southwest of the Mine Site." (Baffinland, 2026, p. 86)
> [Emphasis added by reviewer]

The 2025 Wildlife Report does not discuss what appears to be linear areas of dust extending from the Port and northern portion of Tote Road and from the Mine Site southeast for distances of approximately 30 to 40km (Maps 7-3, 7-4, 7-5). Similar features appear in maps from previous years, including those from pre-mine operational years, but appear to be more extensive and concentrated during mine operational years (Baffinland 2026, Appendix D). These 'plumes' appear to extend far beyond predicted dust fall for the mine and port. Although these plumes may be related to geographic/terrain features, their close association with Project infrastructure warrants further investigation. The orientation of these plumes may be consistent with prevailing winds during March to May 2025, the period during which satellite data were acquired. However, wind data for this period are not available for review. Section 4.4.2.3 of the 2025 Wildlife Report provides seasonal wind data from December to March (winter winds) and June to September (summer winds). Data are missing for April, May, October and November. The GN believes it would be useful to summarise wind data for March to May (Spring winds) that coincide with the period when satellite-based dust data were collected.

Comparing predicted rates of dust fall with satellite-based estimates of dust concentration

Section 7.4.1.5 of the 2025 Wildlife Report presents information on the extent and concentration of dust fall based on the relationship between SDI values derived from satellite imagery and dust fall accumulation measured by passive dust monitors in grams per square meter (g/m^2). Based on this analysis, the 2025 Wildlife Report concludes that:

> "The dust fall extent was within the predicted annual dust fall extents, except to the southwest of the Mine Site." (Baffinland, 2026, p.86)

It is unclear to the GN how this conclusion was reached. The 2025 Wildlife Report does not cite specific data or results to support this conclusion. The maps presented in the

2025 Wildlife Report show estimated dust fall concentration in grams per square meter (g/m^2). As noted in section 7.4.1.5 of the 2025 Wildlife Report, this represents estimates of dust fall over the period between the last snowfall event (determined from weather observations) and the image acquisition date. The satellite images were acquired from March to May. In contrast, the predicted dust fall concentration contours on maps 7-3 to 7-5 of the report show the Maximum Predicted Annual average dust fall in grams per square meter per year ($g/m^2/yr$). These two metrics are not comparable. Comparing the annual dust fall prediction contours to SDI-derived values of dust fall for a period between March and May is misleading and may underestimate the extent of dust fall relative to FEIS predictions.

REQUEST(S)/RECOMMENDATION(S)

The GN recommends that the Proponent undertake the following:

1. Report wind speeds and orientation for the period March to May (Spring winds) to facilitate review of satellite-based estimates of dust concentration and distribution.

2. Consider assessing interannual variation in satellite-based estimates of dust distribution extent and concentration around the mine and port sites in relation to annual variation in spring wind speeds and orientation. Metrics for rates of ore extraction and shipping and road traffic should also be considered in this analysis.

3. Future reports should provide maps of dust extent and concentration that compare estimates derived from satellite and passive dust fall monitoring data to FEIS predictions using equivalent metrics (i.e. g/m^2/specified time period), thus allowing direct comparisons.