



May 7, 2026

Barrie Ford
Director, Department of Environment, Wildlife and Research
Makivvik Corporation
P.O. Box 179
Kuujuuaq, Quebec
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**Re: NOTIFICATION ON FUEL SPILL MODELLING PROPOSED LOCATIONS – STEENSBY
COMPONENT OF THE MARY RIVER PROJECT**

Dear Mr. Ford,

Thank you for your letter dated April 29th, 2026, in response to Baffinland's February 17th, 2026 letter regarding Makivvik Corporation's comments on the proposed fuel spill modelling locations for the Steensby Component. Baffinland has provided specific responses in Attachment 1.

Baffinland would also like to provide further information on timelines for construction and operation of the Steensby Component and sequencing for development of management plans and mitigation measures for commercial shipping. We anticipate construction to begin in 2027 with a three to four-year construction period. During this time, and prior to commercial shipping of ore along the Southern Shipping Route, Baffinland will continue to collaborate with the Marine Environment Working Group (MEWG), of which Makivvik Corporation is a member, on the development of management plans regarding shipping-related incidents and the marine environment. Prior to construction, there is focus on progressing the spill modelling exercise as an input into development of the aforementioned management plans.

Baffinland will continue to work with Makivvik to align on an engagement plan for select Nunavik communities that is in line with Baffinland's overarching engagement principles and plan. This work can occur through the regular bi-lateral update meetings held between both parties' technical teams. Given the uncertainty regarding financial close on the Steensby Component of the Project, the timing of in-person engagements will have to consider the companies available resources and understanding of clear construction and operation timelines.

Baffinland looks forward to continued collaboration and discussions with Makivvik through the MEWG and bi-lateral meeting pathways.

Regards,

A handwritten signature in blue ink, appearing to read "Tigullaraq", with a long horizontal flourish extending to the right.

Joseph Tigullaraq

Head of Northern Affairs

Cc: Elisabeth Luther, Senior Manager Regulatory Affairs

Attachments

Attachment 1. Baffinland's Response to Makivvik's Comments Received April 29th, 2026

Attachment 1

Baffinland's Response to Makivvik's Comments Received April 29th, 2026

Table 1. Baffinland’s Response to Makivvik’s Comments on Spill Modelling for the Steensby Component, received April 29th, 2026.

Comment	Baffinland’s Response
Makivvik would like to request that a detailed engagement plan be developed to more formally articulate Baffinland’s engagement strategy with Nunavik Inuit, including targeted organizations and communities, timelines, engagement activities, goals and desired outcomes. It is equally important to the development of this plan that it be communicated to the Anguvigaq as well as all concerned communities - Makivvik can provide assistance in providing appropriate contacts to Baffinland.	Baffinland will continue to work with Makivvik to align on an engagement plan for select Nunavik communities that is in line with Baffinland’s overarching engagement principles and plan. This work can occur through the regular bi-lateral update meetings held between both parties’ technical teams. Given the uncertainty regarding financial close on the Steensby Component of the Project, the timing of in-person engagements will have to consider the companies available resources and understanding of clear construction and operation timelines.
Makivvik is pleased to see the commitment: complete a spill probability analysis. However, we recommend that this be included at the spill modelling stage rather than being conducted after the fact in the risk assessment. Indeed, for the modelling to be useful and effective, it should produce risk maps and not just spill maps. This would inform shipping operations and spill preparedness more thoroughly and fundamentally.	Spill probability analysis is not within scope of the current spill modelling exercise. Once Baffinland initiates development of the risk assessment for Project-related shipping accidents, prior to the commercial shipping of ore, further information shall be provided through the Marine Environment Working Group.
As suggested in our previous letter, we would request a most probable scenario also be included, in addition to a worst-case scenario. These types of scenarios reflect the accident types and spill volumes that are statistically more likely to occur along the shipping route and therefore provide more practical information for response planning, resource allocation, and community preparedness.	The scope of the spill modelling exercise, which includes a stochastic analysis and a worst-case scenario, is considered sufficient. The stochastic analysis uses a range of environmental variables at each model location to simulate hundreds of spill scenarios, generating the probable distribution of a spill. By conducting the stochastic analysis, in combination with the deterministic analysis (worst-case), a complete range of outcomes are captured in the model. Spill response planning is best informed considering the full range of spill scenarios and a worst-case scenario.
It is positive to see that Baffinland has committed to including financial costs related to spills within the scope of the risk assessment. This is a new commitment and we welcome it, as it will contribute to a full understanding of the risks and benefits of shipping in Hudson Strait and into Steensby. To	Once Baffinland initiates the development of a risk assessment for Project-related shipping accidents, prior to the commercial shipping of ore, further information shall be provided through the Marine Environment Working Group.

Comment	Baffinland's Response
have a clear understanding of the intended risk assessment exercise, could Baffinland provide the full scope of the risk assessment and how term and condition 80 acts as the outline for it?	
Regarding the response to Makivvik's recommendation for response gap analysis, could Baffinland provide details on the Spill at Sea Response Plan and how it relates to the Steensby route through Hudson Strait? Specifically, how will the response gap be researched and conducted within that plan?	Once Baffinland initiates the development of a Spill at Sea Response Plan for the Southern Shipping Route, further information shall be provided through the Marine Environment Working Group.
Lastly, as mentioned in our previous letter, we do not consider the current number of locations sufficient to accurately model spills in the Hudson Strait, including when looking at the minimum description provided in term and condition #97... For example, Kiliniq and its surroundings are known as a biodiversity hotspot and a pinch point of entry in the Strait, though it is not part of the sites that have been identified. Another factor to consider is the fact that ships may be forced to transit through southern sections of the Strait due to weather, ice, or emergencies. Considering the distance travelled in the Hudson Strait and potential impacts for multiple communities in Nunavik, having one model location isn't sufficient. We would therefore request that additional locations be identified in the Hudson Strait, including through community engagement, to understand the potential magnitude and consequences of a spill in this region more specifically and accurately.	Thank you for the information. Upon review, Baffinland agrees to include a spill modelling location at the mouth of Hudson Strait (SR-5) in addition to the two locations already selected in the Strait (SR-3 and SR-4).