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Department of Environment
Wildlife and Research

Kuujuuaq, April 29, 2026

Joseph Tigullaraq
Head of Northern Affairs
Baffinland Iron Mines Corporation
611 Queen Elizabeth Way, Suite 101
Iqaluit, NU
X0A 3H0

**Re: Notification on Fuel Spill Modelling Proposed Locations – Steensby
Component of the Mary River Project**

Dear Mr. Tigullaraq,

Thank you for your letter dated February 17, 2026 following Makivvik's comments on Baffinland's planned oil spill modelling for the Steensby shipping route. We appreciate the detailed responses and wish to provide follow-up comments in order to ensure sound modelling and, more generally, the appropriate implementation of Baffinland's certificate terms & conditions and responsibilities towards Nunavimmiut.

I would like to first acknowledge Baffinland's commitment to accurately reflect the communities of Nunavik in any maps and engagement materials, as well as the commitment to continued meetings with Makivvik and community outreach as part of implementing obligations under Terms and Conditions 127 and 181. As part of the fulfilment of these commitments, 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.

Regarding engagement on the spill modelling specifically, we understand from exchanges with Baffinland representatives, through our bilateral update meetings, that the spill modelling exercise might take place before community consultations in the Fall 2026, and that despite this sequence, Baffinland plans on consulting Nunavik communities on the spill modelling, including mapping, and integrating input from such consultations into the modelling exercise. This is a comprehensive approach that

www.makivvik.ca

O Head Office • Siège Social
C.P. 179
Kuujuuaq QC J0M 1C0
Tél. (819) 964-2925
Fax (819) 964-2613

O Montréal
1111, boul. D' Frederik-Philips 3^e étage
St-Laurent QC H4M 2X6
Tél. (514) 745-8880
Fax (514) 745-3700

O Québec
580, Grande-Allée E.
Suite 350
Québec QC G1R 2K2
Tél. (418) 522.2224

we certainly support.

On the specifics of the spill modelling, we have further comments aimed to ensure that the exercise appropriately serves its intended outcomes, both from a risk management and engagement standpoint:

1. 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.
2. 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.
3. 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 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?
4. 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?

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:

Term and Condition 97:

1. *Prior to the commercial shipping of iron ore, the Proponent shall conduct fuel spill dispersion modelling that will, at a minimum, consider:*
 - a. *Modeling of oil spills for both the Northern and Southern Shipping Routes, in representative locations, identified by the Proponent, in consultation with*

the Marine Environment Working Group along both Shipping Routes, and including:

- i. Pinch points;*
 - ii. The approaches into Steensby Inlet and Milne Inlet;*
 - iii. Shallow water and shorelines; and,*
 - iv. Areas that have been identified as having high flows and/or high concentrations of marine mammals, marine fish or seabirds.*
- b. Open water and, where applicable, ice-covered conditions;*
- c. Spill volumes up to and including loss of a full tanker cargo; and,*
- d. Differences in the quantity and properties of each type of bulk fuel transported by vessels when they are at, or in transit to, the ports at Steensby Inlet and Milne Inlet.*

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.

We thank you for the opportunity to provide feedback on this important component of the project. We look forward to receiving your responses to the above questions and to further engage on the spill modelling work as well as the other work planned by Baffinland regarding the Steensby port.

Best regards,



Barrie Ford

Director, Department of Environment, Wildlife and Research
Makivvik