



February 17, 2026

Barrie Ford
Director of Environment
Makivvik Corporation
P.O. Box 179
Kuujuaq, Quebec
J0M 1C0

**Re: NOTIFICATION ON FUEL SPILL MODELLING PROPOSED LOCATIONS – STEENSBY
COMPONENT OF THE MARY RIVER PROJECT**

Dear Mr. Ford,

Thank you for your letter dated January 21st, 2026, in response to Baffinland's notification regarding proposed fuel spill modelling locations for the Steensby Component of the Mary River Project, issued on November 26th, 2025. Baffinland appreciates your comments and is pleased to provide our response (Attachment 1). We look forward to a continued collaboration.

Regards,

A handwritten signature in black ink, appearing to read "Joe Tigullaraq", written over a light grey rectangular background.

Joe Tigullaraq
Head of Northern Affairs

Cc: Elisabeth Luther, Senior Manager Regulatory Affairs (Baffinland)

Attachments

Attachment 1 Baffinland's Response to Makivvik's Comments on the Spill Modelling Notification Letter

Attachment 1

Baffinland's Response to Makivvik's Comments on the Spill Modelling Notification Letter

Table 1. Baffinland’s Response to Makivvik’s Comments on Spill Modelling for the Steensby Component, received January 21st, 2026.

Comment	Baffinland’s Response
Engagement with Nunavimmut	
As a general comment, we note that the map provided as an annex to your letter does not include any mention of the communities in Nunavik, their location, or an understanding of its inhabitants. This could have been an oversight; if it was, we would appreciate any further depiction or mapping of our region to include this information. There are numerous communities on the coast of Hudson Strait. We would be happy to share this information with Baffinland if you don’t have it.	Baffinland appreciates this observation and recognizes the importance of identifying the locations of communities in Nunavik when mapping for the spill modelling. Future maps developed for this scope of work will include the location of Nunavik communities.
In your letter, there isn’t mention of the engagement with Nunavimmiut or plans to do outreach to Nunavik communities. How do you intend to fulfill your obligations under conditions 127 and 181 of the project certificate? Can you share your intentions around engagement in Nunavik on spill modelling or on any other issues which will impact our territory?	In alignment with ongoing discussions between Baffinland and Makivvik Corporation, Baffinland plans to engage with relevant Nunavik communities in relation to the Steensby Component of the Mary River Project, prior to Project-related construction shipping activities, with a preference for 2026. This intent has been shared directly with Makivvik Corporation, and we are continuing discussions related to logistical arrangements and appropriate communication pathways with communities. Furthermore, Makivvik has been a member of the Marine Environment Working Group (MEWG) since 2013. Meeting records of the MEWG meetings are distributed to all members via email, regardless of attendance at meetings. Since Baffinland renewed its focus in 2023 on plans to advance the Steensby Component, Makivvik has participated in five MEWG meetings, and regular bilateral meetings have been held between Baffinland and Makivvik since the beginning of 2024 to provide updates on the Steensby Component. As the Steensby Component progresses, Baffinland is committed to continue meeting with Makivvik Corporation to provide direct updates, in addition to meeting its obligations under the Project Certificate, including Terms and Conditions 127 and 181.

Comment	Baffinland's Response
Scope of the Research	
Suggest additional activities be included in the modeling: Spill probability analysis: Determining how likely or unlikely an oil spill will occur is an essential component of preparing for and preventing a spill and its consequences. Oil spill probability analysis could examine how often groundings, collisions, or other accidents or failures would occur along the Hudson Strait route and provide this into the spill modelling outputs.	As per Project Certificate Term and Condition 80, prior to commercial shipping of iron ore, Baffinland will conduct a detailed risk assessment for Project-related shipping accidents, noting areas along the ship tracks where vessels may be particularly vulnerable to environmental conditions such as sea ice, and any seasonal differences in risk. This assessment will inform mitigation and adaptive management plans. The scope of the spill modelling is to model hypothetical spill scenarios as an input to preparing for and preventing a spill, ultimately informing the Spill at Sea Response Plan in development for use of vessels along the Southern Shipping Route. Probability analysis will be completed as part of the risk assessment conducted prior to commercial shipping of ore.
Duration/trajectory: How long certain types of oil spills would remain in the environment, and what their movement and drift trajectory would be could provide valuable insights into coastal impact.	The spill model, using OILMAP/SIMAP oil spill modelling system, will quantify the transport and fate of several components of hydrocarbon mixtures through different compartments of the marine environment over time, including the surface, water column and shoreline. The trajectory is primarily driven by forces such as ocean currents and surface wind drift, which determine the path of the oil and its likelihood of coastal contact. The model also accounts for the oil's natural tendency to spread horizontally, and mix vertically within the upper mixing layer of the ocean, providing a three-dimensional view of where the oil travels over time. The oil spill modelling will be performed in two steps: 1) a stochastic analysis that predicts the spatial and temporal probabilistic distribution for a spill event, and 2) a deterministic analysis that identifies the worst-case scenario. The stochastic simulations provide insight into the probable behaviour of potential oil spills in response to temporally- and spatially varying meteorological and oceanographic conditions in the study area. For each spill scenario, one deterministic trajectory/fate simulation will be run to investigate a specific "worst-case" spill event that could potentially occur using the same combination of winds and current forcing used in the corresponding stochastic simulation from which it was identified. The worst-case scenario is selected

Comment	Baffinland's Response
	based on the degree of shoreline oiling and will represent a scenario where a large clean-up response would be necessary to protect shoreline habitats.
Costs: Examining costs of a spill for not only clean up but to valued ecosystem components and Inuit harvest rights supports cost benefit decision making in the region and for the continued approval of shipping activities.	The scope of the spill modelling is to model hypothetical spill scenarios as an input to preparing for and preventing a spill, ultimately informing the Spill at Sea Response Plan in development for the Southern Shipping Route. Understanding of the costs required for spill clean up will be considered for the risk assessment prior to commercial shipping of ore, as required under Project Certification Term and Condition 80.
Response gap analysis: Understanding the time required to respond to a spill and where the resources will come from for that response supports preparedness investments.	The scope of the spill modelling is to model hypothetical spill scenarios as an input to preparing for and preventing a spill, ultimately informing the Spill at Sea Response Plan in development for the Southern Shipping Route. Understanding of the time required to respond to a spill is within scope of the Spill at Sea Response Plan. This plan will be in place prior to Project-related vessels travelling to Steensby Port.
Most probable scenario: A worst-case scenario is included as part of the scope for this research, which is useful. However, a most probable scenario is even more helpful with preparedness planning.	Probability analysis will be completed as part of the risk assessment conducted prior to commercial shipping of ore, as required under Project Certification Term and Condition 80.
Additional locations: Considering the distance travelled in Hudson Strait, and potential impact for multiple communities in Nunavik, having one model location isn't sufficient. We would request at least 3 more locations be added in Hudson Strait to fully understand the magnitude and consequences of a potential spill in this region. With numerous Nunavik communities on the coastlines of Hudson Strait and Ungava Bay, more accurate and specific modeling experience is needed to determine risk factors for Nunavimuit in this region.	Project Certificate Term and Condition 176 requires Baffinland to undertake spill trajectory modelling for areas of Hudson Strait, such as Mill Island, where walrus concentrate, as well as for mid-Hudson Strait. As such, Baffinland included two model locations in Hudson Strait (SR-3 and SR-4). Baffinland is confident the current scope of the model includes locations that are representative of spill trajectory for the general areas they are located, and reasonably sufficient to inform subsequent risk analyses and updates to the Spill at Sea Response Plan. The number of locations in Hudson Strait also meets relevant Project Certificate Terms and Conditions, which were developed by the NIRB based on concerns identified by Interveners, including Makivvik during the review of the Final Environmental Impact Statement.