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Department of Environment
Wildlife and Research

January 21, 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 the letter dated November 26th, 2025, from Baffinland Iron Mines Corporation (Baffinland) on your planned oil spill modelling for the Steensby shipping route. We appreciate the opportunity to comment.

As you know, Makivvik is the birthright organization that represents the Inuit of Nunavik. It is mandated to protect the rights, interests and financial compensation provided by the 1975 James Bay and Northern Quebec Agreement (JBNQA) and the 2006 offshore Nunavik Inuit Land Claims Agreement (NILCA). Makivvik represents approximately 14 000 Inuit who are beneficiaries of the JBNQA and the NILCA, of whom the majority live in 14 coastal communities north of the 55th parallel in the province of Québec.

Increased shipping through the Hudson Strait is a concern for Makivvik and for Nunavimmut. As Baffinland begins to phase out shipping into Milne Port and turn its attention to shipping from the Mary River Mine through Hudson Strait and Foxe Basin into Steensby Port, the impacts this could have on Nunavik communities, Nunavik Inuit lands, waterways, travel routes, sea ice, hunting areas, supply lines, and coastal areas are at the top of our mind. We therefore welcome this invitation to take part in the shaping of your oil spill modeling, which is an important component of the prevention and mitigation measures required for a project of such kind.

We note that the Marine Environment Working Group (MEWG) for the Mary River Mine, as your letter reiterates, will have ongoing engagement in the development of spill modelling and for analyzing its results. While we have provided comments in this correspondence, as MEWG members we will also engage with other ITOs and communities to give feedback on the spill modelling through the MEWG process. This letter doesn't preclude that continued engagement.

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Our specific comments on Baffinland's spill modelling proposal focuses on two main areas: the engagement with Nunavimmiut and the scope of the research.

Engagement with Nunavimmiut

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.

Term and Condition 127 of the project certificate calls for Baffinland to, *"...ensure that communities and groups in Nunavik are kept informed of project shipping activities and are provided with opportunity to participate in the continued development and refinement of shipping related monitoring and mitigation plans."* Additionally, term and condition 181 calls for *"...enable(ing) Makivik Corporation and Nunavik communities near shipping lanes to remain informed and involved in those shipping activities which could affect the marine environment and marine mammals. Regardless of whether Makivik Corporation participates as a member of the Marine Environment Working Group, the Marine Environment Working Group will provide Makivik Corporation with regular updates regarding the activities of the Marine Environment Working Group throughout the Project life cycle."*

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?

Scope of the research

We appreciate that the current spill modelling proposal reflects terms and conditions originally agreed as part of the 2012 Final Environmental Impact Statement (FEIS), primarily term and condition 97. To be comprehensive and adequately address the intent of the term and condition, which is *"To prevent impacts to the marine environment along the shipping route"*, we would suggest additional activities under the scope of this activity 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.

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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.

- **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.
- **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.
- **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.
- **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.
- **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 Nunavimmut in this region.

Thank you for the opportunity to provide feedback on this important issue for Nunavimmiut. We look forward to receiving your responses to the above questions and to further engage on the spill modeling work as well as the other work planned by Baffinland in regard to the Steesby port.

Best regards,

Barrie Ford

Director, Department of Environment, Wildlife and Research
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