



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

August 11, 2026

Re: Update on Term and Condition 106 (Ship-Based Observer Program Implementation)

Dear Keith,

This letter provides a formal update to the Nunavut Impact Review Board (NIRB) in response to NIRB Recommendation #3 from the 2024 annual report that states:

Baffinland is required to provide an update of the reasonable measures that are being, or could be, taken for Baffinland to meet the requirements of Term and Condition 106 requiring shipboard observers to be onboard when shipping occurs. If Baffinland determines that the shipboard observer program is no longer practicable, the proponent shall submit for Board consideration an amended term and condition outlining alternative measures to fulfil the objective of Term and Condition 106.

For the 2026 shipping season and onwards, Baffinland is working directly with ship owners to implement the Ship-Based Observer (SBO) Program and fulfil the objectives of Term and Condition 106. This program builds on the successful implementation of the Marine Mammal Observation Network (MMON), which was first launched in 2018 and has been conducted annually since.

Program Implementation in 2026

Baffinland has established an operational framework with its contracted ore carriers to support implementation of the SBO Program during the 2026 shipping season. The core program requirements are as follows:

- Crews are encouraged to record and report incidental marine mammal sightings while sailing within Baffin Bay, including waters southwest of Greenland, in support of Baffinland's ongoing collaboration with the Marine Mammal Observation Network (MMON).
- In addition, and new this year, on-board observers will conduct focused 30-minute observations every two hours, beginning when vessels enter the Regional Study Area (RSA) at longitude 74° West and continuing throughout the transit to Milne Port. This includes both inbound and outbound transits through the RSA.

Training, Protocols, and Data Submission

To support data integrity and vessel safety, Baffinland has implemented the following measures:

- Designated observers have access to comprehensive online training modules available at <https://navigatingwhales.ca>.
- Crews have been provided with SBO data collection protocols, species identification sheets, and data recording sheets.

- Completed observation charts will be submitted to Baffinland at two key points: upon berthing at Milne Port and upon exiting the RSA at 74° West.

Reporting

Baffinland will provide the Board with the collated data and analysis from the 2026 SBO Program in the 2026 Annual NIRB Report. Upon completion of the 2026 shipping season, Baffinland will debrief with owners to confirm the overall success of the program and will report back on any challenges that arise that would support refinement of the program in the future.

We trust that these measures demonstrate Baffinland's ongoing commitment to meeting the environmental oversight requirements set by the Board.

Please let me know if you have questions or require clarification.

Sincerely,

A handwritten signature in black ink, appearing to read "Cortney Oliver".

Cortney Oliver
Senior Manager Environment, Social Governance
Baffinland Iron Mines Corporation

cc: Megan Lord-Hoyle, Lou Kamermans, Jesse Manufor, Varun Nayak, Kelli Gillard