



# Public Engagement Summary Report

in support of the development of a  
Cumulative Effects Assessment Framework for  
Baffinland Iron Mines Corp.'s Mary River Project

NIRB File No. 08MN053

August 11, 2026



Sustainable Future, Worldwide Reach

**Disclaimer:**

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*The author extends gratitude to the NIRB, CEAF Steering Committee and all participants in the community information sessions and workshop; any errors or omissions are the sole responsibility of the author and are not to be attributed to members of the CEAF Steering Committee or the NIRB.*

## Executive Summary

In support of the ongoing development of a Cumulative Effects Assessment Framework (CEAF) for the Mary River Project, recently the Nunavut Impact Review Board (NIRB) issued a Discussion Paper and supporting documents for public feedback and facilitated community information sessions and a multi-day workshop to engage directly with potentially affected communities and interested parties. These engagement efforts allowed the NIRB to share information on the development of the CEAF and provided opportunities for community knowledge and Inuit Qaujimajatuqangit to inform and guide the initiative, while also improving public awareness and confidence in monitoring outcomes, oversight and consideration for cumulative effects in Nunavut.

Active participation by community members and interested parties resulted in the NIRB receiving detailed feedback and recommendations on how to advance development of the CEAF and ensure pragmatic outcomes going forward. This Summary Report provides background for each engagement session, overviews of engagement outcomes, and lists with more detailed feedback provided by participants. 27 potential action items have been identified for the NIRB, the CEAF Steering Committee and other participants in this initiative to improve Inuit engagement and consideration of Inuit Qaujimajatuqangit, clarify cumulative effects methodology, improve potential data alignment between the Mary River project and regional monitoring, and ensure transparency and public awareness of current project approvals and limits for the Mary River project.

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## Introduction

The Nunavut Impact Review Board (NIRB) is developing a Cumulative Effects Assessment Framework (CEAF) to set a scope and methodology for an evaluation of current cumulative effects monitoring (both project-based and regional) and to guide future impact assessments associated with Baffinland Iron Mines Corporation's (Baffinland) Mary River Project. The CEAF will facilitate an updated approach to cumulative effects assessment for future applications and may identify potential improvements for the monitoring, mitigation and management of cumulative effects, and potentially inform updates to the monitoring program and associated reporting for the approved Mary River Project.

A Discussion Paper was prepared by the NIRB with contributions from the CEAF Steering Committee (Baffinland, Nunavut Tunngavik Inc., Qikiqtani Inuit Association, Government of Nunavut, and Government of Canada) to provide background information and support the development of the CEAF. The discussion paper will build awareness of how the potential for cumulative effects associated with the Mary River Project is considered within the unique legislative framework of Nunavut for resource development, project assessment, project monitoring and regional cumulative effects monitoring. A summary of regional research and monitoring programs was also prepared as well as background documentation on the Mary River Project and cumulative effects including a compilation of past cumulative effects assessments, assumptions and supporting data for each selected key valued component from the Mary River Project and associated amendments. The Discussion Paper and supporting documents were released publicly on April 30, 2026, with interested parties invited to provide initial written feedback to the NIRB by June 1, 2026.

Following the release of the Discussion Paper, from May 9-15, 2026, the NIRB facilitated information sessions in targeted communities across the Qikiqtani region to:

- share information on the development of a CEAF for the Mary River Project;
- provide opportunities for community knowledge and Inuit Qaujimajatuqangit to inform and guide the initiative;
- improve public awareness and confidence in the monitoring outcomes and oversight for the approved Mary River project; and,
- enhance the awareness of how cumulative effects are considered within the unique legislative framework of Nunavut for resource development, project assessment and project monitoring.

A workshop was held in Iqaluit from June 9-10, 2026, to bring interested parties together to further development of the CEAF through a guided discussion of key issues and initial

feedback on the Discussion Paper. This summary report provides an overview of the feedback received from the community information sessions, written submissions and CEAF Workshop which will inform the development of the CEAF moving forward.

# Community Information Sessions

## Overview

Community information sessions were conducted to support the development of the Cumulative Effects Assessment Framework (CEAF) for the Mary River Project by engaging with potentially affected communities and providing a direct opportunity for feedback. The community information sessions provided an opportunity to present information about the Mary River Project and cumulative effects, gather community feedback, and better understand local concerns and priorities. The information collected during the tour will help guide future workshops, communications, and community engagement activities.

The schedule of community information sessions was as follows:

| <b>Date</b>    | <b>Community</b>                                                      | <b>Location</b>                                    |
|----------------|-----------------------------------------------------------------------|----------------------------------------------------|
| May 9-10, 2026 | Resolute, Grise Fiord, Clyde River, Kinngait, Kimmirut, Coral Harbour | Iqaluit session – Baffin Room in the Frobisher Inn |
| May 11, 2026   | Sanirajak                                                             | Community Hall                                     |
| May 12, 2026   | Naujaat                                                               | Tuugaalik High School Gym                          |
| May 13, 2026   | Igloolik                                                              | Community Hall                                     |
| May 14, 2026   | Arctic Bay                                                            | Community Hall                                     |
| May 15, 2026   | Pond Inlet                                                            | Attakalik Community Hall                           |

Information sessions were structured for in-person attendance only, with simultaneous interpretation in English/Inuktitut, refreshments and door prizes provided for participants. To the extent possible the NIRB staff were accompanied by representatives from the CEAF Steering Committee for the information sessions in each community. Members of the public and interested parties were encouraged to attend, ask questions, and share knowledge and feedback to support the initiative.

The Iqaluit session was organized to accommodate representatives from communities with notable logistical constraints so they could participate effectively; the Iqaluit session also included the Iqaluit Hunters and Trappers Organization and interested community members. Letters were sent in advance to organizations in each community to appoint delegates to attend these sessions.

Owing to weather conditions and travel cancellations several of the scheduled sessions were not completed and some community delegates were unable to attend as planned. The NIRB scheduled a final information session virtually via Zoom on July 14, 2026 to further

support engagement in this initiative by community members who were unable to attend previously scheduled sessions.

After the NIRB shared its overview presentation, participants discussed community concerns, local observations, monitoring programs, project updates, and feedback for the cumulative effects assessment framework.

## Summary of Feedback

Participants in the community information sessions shared their knowledge and suggestions about what should be included in the Cumulative Effects Assessment Framework regarding the land, traditions, and community. People spoke about the close connection between wildlife, the land, and community well-being — and how this relationship has been affected from past development and cumulative effects. They expressed that marine mammals and caribou are central to food, health, language, and cultural identity, and participants want to understand how these values will be protected.

A summary of topics, community knowledge, values, comments, and recommendations included:

- Changes in animal population, behaviour, and distribution;
- Changes in the weather as well as the ocean water and ice conditions;
- The cumulative impact of multiple pressures on tourism and to the environment;
- The important animals as well as places to pay more attention to;
- Important topics to look at when studying these changes;
- Timelines to consider like how far back to look and what to consider for the future; and,
- How reports can be made more accessible to communities and how to keep them involved as work continues.

## Detailed Feedback

The following compilation of feedback was developed from notes recorded by staff of the Nunavut Impact Review Board during community information sessions; feedback gathered during each information session has been grouped by relevant topics to assist with informing the development of a CEAF going forward.

| Subject                                                                                            | Knowledge, Values, Comments, and Suggestions                                       |
|----------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|
| <b>What changes have you seen on the land, water, ice, animals, or in the community over time?</b> |                                                                                    |
| Caribou                                                                                            | <ul style="list-style-type: none"><li>• Lots of caribou in Kimmirut now.</li></ul> |

| Subject        | Knowledge, Values, Comments, and Suggestions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|----------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Marine Mammals | <ul style="list-style-type: none"> <li>• In the 70's every inlet near Kinngait had narwhals, but now due to climate change affecting the water in Hudson Strait, they are seeing more belugas.</li> <li>• Lots of belugas in Kimmirut in May, but usually more in June.</li> <li>• Kinngait noticed a decline in seal population in the 90's and has continued to go down ever since.</li> <li>• Killer whales circling a pair of bowhead whales outside of Kinngait, preventing them from leaving the area, hasn't been seen before.</li> <li>• Seeing more harp seals, may be due to less ice in southern waters now.</li> <li>• Narwhals used to calve in Repulse Bay, the old sailboats were quiet and there were more cod to feed on. Now with more people and bigger boats the cod moved to deeper water, so the narwhal no longer are on the shores of Repulse Bay.</li> <li>• Once Nunavut was established, after 1999, and the mines came around, Naujaat was no longer an area for bowhead whales.</li> <li>• People used to be able to catch multiple narwhals at a time, now the quota is at 100.</li> <li>• Hear about less whales in Pond Inlet, but more in Kugaaruk compared to Naujaat, which could be due to climate change.</li> <li>• Hunters noticing more animals coming through town, may be that the number has not increased, but just reacting to the noise of the Baffinland ships.</li> <li>• We would like to hear what the monitoring tells us about what happened to the narwhals when the Mary River Project started up through to today. Have the narwhals disappeared?</li> </ul> |
| Polar Bears    | <ul style="list-style-type: none"> <li>• Fewer ducks now as polar bears over eat the eggs. More bears lead to less seals.</li> <li>• More coming into communities due to lack of ice and seals.</li> <li>• People are nervous to be camping in tents due to the increase in polar bears.</li> <li>• Now, seeing more in the Fall due to less ice. Will only camp if they have a cabin</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Wolverine      | <ul style="list-style-type: none"> <li>• Seen for the first time in Kinngait.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Birds          | <ul style="list-style-type: none"> <li>• Bald eagle siting in Kimmirut.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

| Subject                                                                                                                                                  | Knowledge, Values, Comments, and Suggestions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                          | <ul style="list-style-type: none"> <li>Used to have many eider ducks, you could hear them for a month when they showed up. Now you barely hear them.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Water/Ice                                                                                                                                                | <ul style="list-style-type: none"> <li>Floe edge not thick enough for hunting anymore and forms closer to the community now.</li> <li>In Kinngait, tides go lower now, reefs look closer to the surface</li> <li>In Sanirajak, hunters used to go on moving ice, now not many go out as it is too dangerous without a dog team.</li> <li>Greenland Sharks beginning to show up, one washed ashore near Sanirajak, may be related to climate change and warming water</li> <li>In Sanirajak, you are able to see the seafloor for quite a distance now as the land and seafloor is rising.</li> </ul> |
| Invertebrates                                                                                                                                            | <ul style="list-style-type: none"> <li>Mussels growing in more places around Kinngait</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Weather                                                                                                                                                  | <ul style="list-style-type: none"> <li>Fall time snow has a different feel to it now.</li> <li>The sun goes further above the horizon now.</li> <li>The elders know that the weather is different, it is now unpredictable and complex. Winter is not as long and the Summer is sooner and last longer, including less ice in the Fall. Climate change is real.</li> </ul>                                                                                                                                                                                                                           |
| <b>Which changes do you think come from many things happening together, like shipping, mining, climate change, hunting, travel, or community growth?</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Tourism                                                                                                                                                  | <ul style="list-style-type: none"> <li>Communities have put in a limit to the amount of cruise ships due because of too many people.</li> <li>People coming to communities for the experience, not just for the art.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                      |
| Shipping                                                                                                                                                 | <ul style="list-style-type: none"> <li>We have been affected by the ships for this project and the other mines and are concerned about the larger ships and greater traffic approved for Steensby Inlet and Foxe Basin.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                   |
| Ice                                                                                                                                                      | <ul style="list-style-type: none"> <li>Climate change and more water is making the sea ice more open and now seeing more belugas in Kinngait.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>What animals, places, waters, trails, harvesting areas, or community issues should we pay the most attention to?</b>                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Animals                                                                                                                                                  | <ul style="list-style-type: none"> <li>The migratory animals, such as the geese, eider ducks, whales, and caribou</li> <li>Caribou will stay in one spot for 50 years, once the food is used up, they move to another location. Organizations can gain knowledge</li> </ul>                                                                                                                                                                                                                                                                                                                          |

| Subject                                                                                                                                                  | Knowledge, Values, Comments, and Suggestions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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|                                                                                                                                                          | <p>from monitoring partnerships with Inuit. Communication is key. Hunters should gather information.</p> <ul style="list-style-type: none"> <li>• Near Sanirajak, seal hunting occurs in fjords as walruses occupy the open water areas.</li> <li>• The caribou will be displaced by the roads for the project, the caribou are just starting to rebound in our area (Naujaat), but the project will cause them to decrease again. We are going to have to go far to hunt caribou if that happens.</li> <li>• Elders have always said to respect all wildlife, without them Inuit would not be here. Would like others to know this as well. Try to save them and take care of them as the land and sea are “grocery stores”.</li> <li>• The migratory routes for caribou are important, like between Naujaat and Sanirajak, specifically around the Wager Bay area.</li> </ul> |
| <b>What areas should we look at when studying these changes? Should it include travel routes, hunting areas, shipping routes, or nearby communities?</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Knowledge Sharing                                                                                                                                        | <ul style="list-style-type: none"> <li>• Elders discuss the safety and protection of wildlife and how to share/teach the younger generation not to overhunt wildlife. “It is one of the most needed in northern communities”</li> <li>• Elders go on the local radio stations to tell people that the floe edge is different than before, not safe, and to be careful if you do go.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Climate Change                                                                                                                                           | <ul style="list-style-type: none"> <li>• Has climate change affected the caribou?</li> <li>• Ice is changing in Sanirajak, walruses calving occurs on the ice, but with some of it gone, have they moved to the mainland? Is there monitoring now so that we will know if they have changed in the future?</li> <li>• Some years have less ice than others, if there is less ice, where will the walrus go to bask in the sun?</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Environment                                                                                                                                              | <ul style="list-style-type: none"> <li>• Should community members be concerned with avian flu as birds are eaten often. People wonder where it came from and hopes it is not a result of mining.</li> <li>• Elders recall a “pristine utopia” from when they were children, now there is vast difference, the impact is huge not just on the communities but the region as a whole, including the wildlife and food sources being affected by the development of this mine.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                          |

| Subject                                                                                       | Knowledge, Values, Comments, and Suggestions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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|                                                                                               | <ul style="list-style-type: none"> <li>• Unsure why Eclipse Sound if a protected area, but shipping is still allowed through it.</li> <li>• Earthquake monitoring in Pond Inlet, but the people never hear from the organization that does it</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>How far back in time should we look to understand the changes people are seeing today?</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Background                                                                                    | <ul style="list-style-type: none"> <li>• Concerned if anyone made a baseline of the region before Baffinland was there.</li> <li>• University researchers have been to Bylot Island in the Summer to study geese and foxes for the past 30 years, they may be able to provide a “before and after” of the region.</li> <li>• Must go back before the mine was operational.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>What future changes or project expansions should be considered now?</b>                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Socioeconomics                                                                                | <ul style="list-style-type: none"> <li>• How to calculate the impact on communities when there is more than one mine.</li> <li>• Concerns that the youth have already gone through many changes and will continue to go through many changes with current issues around the world. Worries about the youth's future employment and health, it will be more difficult for them as they are learning more English than Inuktitut. Believes that there is a mess being left for the youth.</li> <li>• Wants to ensure that Inuit are involved with this project, as per the Nunavut Land Claim</li> <li>• Worries that the area will not be cleaned due to the cost of it, that it may be used as an excuse not to.</li> <li>• Would like to see a request for proposals similar to the narwhal monitoring another organization does for Baffinland, but for Inuit Stewardship Programs and involvement as Inuit Knowledge Holders.</li> </ul> |
| Climate Change                                                                                | <ul style="list-style-type: none"> <li>• With climate change happening so quickly, regardless of all the research done, the railroad may have to be moved.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Environment                                                                                   | <ul style="list-style-type: none"> <li>• If the plan to ship out of Steensby continues, will Baffinland be required to clean up the Milne Port for things like dust once they move?</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

| Subject                                                                                                 | Knowledge, Values, Comments, and Suggestions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|---------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                         | <ul style="list-style-type: none"> <li>Concerns on who would be in control of the reclamation of the sites.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>What knowledge, stories, monitoring, or research should be used to understand what is happening?</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Monitoring                                                                                              | <ul style="list-style-type: none"> <li>If walruses move, will we know if it is shipping or something else like climate change affecting them? The communities and HTOs should be involved for monitoring.</li> <li>Collaborate with other organizations that do research in communities, such as Natural Resources Canada for dust, and Oceans North for marine.</li> <li>Mention the area is becoming more like a desert and that dust should be monitored.</li> <li>Shouldn't all animals and species be monitored, not just specific ones?</li> <li>Wonders if anybody is monitoring the geese.</li> <li>Lemmings, weasels, rabbits, and caribou survive eating dust contaminated lichen. Other animals eat these, such as owls, they should be looked at if they are safe to eat and if they can survive eating off the dusty food.</li> </ul>                                                                                                                      |
| <b>How can reports be made easier for communities to read and use?</b>                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Community Involvement                                                                                   | <ul style="list-style-type: none"> <li>Recommends using social media, if you want to pass along information, you will reach younger and older audiences.</li> <li>In terms of communication, the people would like to hear from the organizations, just as the organizations want to hear from the people. Any communication is good communication, especially knowing the long-term nature of this project.</li> <li>Ensure that reports are made available in communities right away, even before coming to present them, not only upload to a website.</li> <li>People would like to hear the results of projects, not just the plans and methods, not everyone reads the reports.</li> <li>Reports from Baffinland are not really trusted, as there is belief that everything is worded to be "fine and good".</li> <li>How could regular people not on committees be involved in attending meetings or workshops that discuss reports such as this one.</li> </ul> |

| Subject                                                                            | Knowledge, Values, Comments, and Suggestions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>How should communities be kept involved and updated as this work continues?</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Community Involvement                                                              | <ul style="list-style-type: none"> <li>• Appreciation towards presentations in Kinngait, including to the High School</li> <li>• Would like information sent in advance so there is time to think and reflect on things.</li> <li>• Elders on local radio stations are ways to pass on traditional knowledge, thankful for broadcasting groups to continue supporting knowledge transfer.</li> <li>• As this consultation is so large and complex, and most of the work is being done from afar, having material to review before consultation begins allows for the content to be thought about and develop questions.</li> <li>• More communication on meeting times before the event.</li> <li>• Baffinland has never been to Naujaat, the people would like them to come, if they were better informed maybe they will understand and support the project.</li> <li>• Wish more community members would show up to meetings like this to hear all the research and monitoring occur by all parties. People believe that it is just mining and no research or monitoring, more interest now that they know their food and animals are being monitored. Recommends having evening sessions after supper for more involvement from the community.</li> <li>• Low community attendance may be due to being there on a Friday before a long weekend and a fishing derby weekend.</li> <li>• The Baffinland and QIA community liaison officers should be on radio more, mentions NIRB could be on tv and radio calling shows discussion cumulative effects and impacts of this project. Perhaps a CD playing in Inuktitut.</li> <li>• Questions if our presentation would be on the radio, and that if it was that it would be in Inuktitut as well.</li> <li>• Consider a few weeks advanced notice, radio announcements, and door prizes for people that show up.</li> </ul> |

# Discussion Paper

## Overview

The CEAF Discussion Paper developed by the NIRB was designed to build awareness of how the potential for cumulative effects associated with the Mary River Project is considered within the unique legislative framework of Nunavut for resource development, project assessment, project monitoring and regional cumulative effects monitoring. A summary of regional research and monitoring programs was also prepared as well as background documentation on the Mary River Project and cumulative effects including a compilation of past cumulative effects assessments, assumptions and supporting data for each selected key valued component from the Mary River Project and associated amendments.

The Discussion Paper and supporting documents were released publicly on April 30, 2026, with interested parties invited to provide initial written feedback to the NIRB by June 1, 2026.

To focus the efforts of reviewers, the Discussion Paper included the following questions for targeted feedback on key issues:

### *Defining Cumulative Effects*

- Is the proposed definition of cumulative effects sufficiently clear?

### *Assessing Cumulative Effects:*

- Is further guidance needed to help differentiate between project-specific effects and cumulative effects?
- What updates to guidance should be adopted to improve the assessment of cumulative effects in future amendment applications?
- What geographic scale and temporal boundaries are appropriate for the development of the CEAF?
- What projects, activities and processes should be considered for development of the CEAF?
- How should induced development/future phases for the Mary River Project be considered?
- What Valued Components (VCs) should be the focus of the CEAF?

### *Monitoring and Management of Cumulative Effects*

- What other sources of research and monitoring information are available to support project-specific cumulative effects assessment and management?

- How can we improve coordination across governments, proponents, academia and other stakeholders for research and monitoring to inform regional cumulative effects management?
- How could the monitoring report templates for the Mary River Project be improved to address potential project contributions to regional cumulative effects and enhance readability?

## Written Feedback

On or before June 1, 2026 written feedback on the Discussion Paper was provided to the NIRB by the following interested parties:

- Nunavut Tunngavik Incorporated (NTI)
- Qikiqtani Inuit Association (QIA)
- Government of Nunavut (GN)
- Government of Canada (GOC)
- Included Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC), Environment and Climate Change Canada (ECCC), Fisheries and Oceans Canada (DFO), Health Canada (HC), Natural Resources Canada (NRCan), Parks Canada (PC), & Transport Canada (TC)
- World Wildlife Fund Canada (WWF)
- Arviq Hunters and Trappers Organization (Arviq HTO)

All written submissions can be accessed online from the NIRB's website at: <https://www.nirb.ca/content/cumulative-effects-assessment-framework#!>

# Workshop

## Overview

The NIRB hosted a workshop in Iqaluit on June 9-10, 2026 to bring interested parties together to further development of the CEAF through a guided discussion of key issues and initial feedback on the Discussion Paper. The workshop was facilitated by Ryan Barry of Red Clay Environmental Solutions Inc. on behalf of the NIRB and was attended by NIRB staff and representatives from the following organisations:

- Baffinland Iron Mines Canada (Baffinland)
- Nunavut Tunngavik Incorporated (NTI)
- Qikiqtani Inuit Association (QIA)
- Igloodik and Sanirajak Hunters and Trappers Organizations (Igloodik & Sanirajak HTOs)
- Naujaat Hunters and Trappers Organization (Naujaat HTO)
- Government of Canada (GOC)
  - Included Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC), Environment and Climate Change Canada (ECCC), Fisheries and Oceans Canada (DFO), Health Canada (HC), Natural Resources Canada (NRCan), Parks Canada (PC), Transport Canada (TC), & Northern Projects Management Office (NPMO)
- Government of Nunavut (GN)
- Oceans North Canada (ON)
- World Wildlife Fund Canada (WWF)



*Figure 1: CEAF Workshop in Iqaluit, June 9-10, 2026.*

During the workshop discussions were focused on the written feedback received on the Discussion Paper, particularly identifying issues where there appear to be some consensus and where there was evidence of divergent views; several additional clarifying questions

were also introduced for discussion, with time also provided to discuss next steps and timelines for the CEAF initiative. As participants worked through the agenda, the written feedback received specific to each issue was highlighted to stimulate discussion. Baffinland was provided with an opportunity to respond to comments for each issue, while parties that provided written submissions were able to further comment and provide additional clarity or context. All parties were invited to provide feedback before moving on to the next topic with the objective of ensuring all views were shared and considered.

## Detailed Feedback

The following summaries of written feedback have been lightly edited to improve readability; to ensure a comprehensive understanding of the comments please refer to the original written submissions to read them in context. Detailed feedback from the workshop was summarized using NIRB meeting notes and video transcripts with efforts made to capture comments and positions as concisely as possible. All feedback is organized under the questions presented within the Discussion Paper for ease of review.

## Defining Cumulative Effects

### Is the proposed definition of cumulative effects sufficiently clear?

For the purposes of developing the CEAF, within the Discussion Paper the following definition for cumulative effects was proposed:

Cumulative Effects are changes to the ecosystemic and socio-economic environment caused by the combined direct and indirect effects of past, present and reasonably foreseeable future development, other human activities and natural processes (such as climate change). These changes may be brought about by the combination of various effects that are additive or interactive, which can change the overall impact of a single effect. Cumulative ecosystemic and socio-economic effects can also result from individually minor, but collectively significant, actions taking place over time.

### *Feedback Summary:*

- General support for the proposed definition, with several parties asking for clearer scope.
- Key issues include whether reference to Mary River Project components should be expressly included, whether post-closure effects should be captured, how “reasonably foreseeable” should be defined, and whether “other human activities,” “combined effects,” and “cumulative impacts” need clearer treatment.

- There is a clear divergence between parties favouring a broader “probable and plausible” future-development standard and those concerned that this could be difficult to address meaningfully and introduce too much uncertainty.

*Written Feedback:*

- (NTI): support the definition with one recommended addition for clarity regarding the scope of cumulative effects. After the text “past, present and reasonably foreseeable future development” propose that the following wording be added: “including all project components associated with the Mary River Project”.
- (QIA): cumulative effects should be considered even after closure and decommissioning, as any future developments that may interact with the Project’s effects after closure and decommissioning are not likely reasonably foreseeable.
- (QIA): the qualifier “reasonably foreseeable” applies to “development”; it does not appear to apply to “other human activities.” What constitutes “other human activities” is not explicit.
- (QIA): recommend that the definition of ‘reasonably foreseeable’ be broadened, so as to include projects which are contemplated, but not yet proceeding through a regulatory process.
- (GN): “past, present and reasonably foreseeable future development” can be considered as the cumulative effects from different phases of an overarching project, which may have been evaluated through distinct NIRB processes, rather than looking at projects from different proponents or industries.
- (GN): Conceptually the definition is clear but it is quite broad and would be very difficult to implement particularly where data gaps exist that would impact the ability to evaluate cumulative effects. Understanding how the definition will be applied to the Mary River Project CEA framework with respect to scope and scale is important.
- (GN): Elements of the discussion and comments from communities so far, seem to be go beyond the scope of the intended objectives of the CEAF for Mary River and could be confused with a broader, high-level Strategic Environmental Assessment for the region. When presenting to the public, an example or case study could be useful to help visualize these definitions.
- (GOC): Support for the definition for cumulative effects proposed in the Discussion Paper.
- (NRCAN): Given the definition provided in the Discussion Paper for “effects versus impacts”, may wish to confirm that, for the purposes of the CEAF, “cumulative effects” are understood to also include consideration of cumulative impacts.
- (ECCC): For clarity, synergistic cumulative effects are typically associated with two or more effects arising from separate mechanisms.

## Assessing Cumulative Effects

Is further guidance needed to help differentiate between project-specific effects and cumulative effects?

### *Feedback Summary:*

- Parties agreed that more guidance is needed on how combined effects from different phases/components of the Mary River Project relate to potential cumulative effects.
- QIA, NTI, GN, and others emphasized that intra-project effects should not be excluded where they interact with broader regional effects.
- Baffinland distinguished effects within its control from cumulative effects arising from external sources.

### *Written Feedback:*

- (QIA): the distinction between inter- and intra-project effects is accurate, in the context of a project-centered and regulatory cumulative effects assessment. Adopting a valued-component-centred approach, in contrast, would mean no distinction between whether the totality of effects is from multiple actions by the same project or actions from separate projects
- (QIA): additional guidance may be needed regarding “combined” project effects, consideration for the unique assessment and development history of the Mary River Project; specifically consideration of the contribution of “combined” project effects to cumulative effects, particularly as certain project components are not yet constructed.
- (GN): the CEA should examine the combined effects of the various phases of the Mary River Project, including reasonably foreseeable future phases, such as the potential Steensby development.
- (GN): the scope of the CEA should remain targeted, with an emphasis on distinguishing project-specific effects from broader regional changes

### *Workshop Discussion:*

- (Baffinland): agrees with the working definition proposed in the White Paper
- (QIA): overview of feedback provided – pretty typical definition, but it is how the associated definitions are defined that potentially create issues, for example definition of “reasonably foreseeable future developments”, would want to see that definition be broader. Should not be just planned, but “probable and plausible” future developments (although recognizes that the level of detail associated with probable

and plausible assessments may be lesser and level of uncertainty may be greater) but still probable and plausible is not speculative and hypothetical

- (Baffinland): is clear what planned activities are when such projects have a project description that everyone is already working with. There is concern that the probable and plausible standard would introduce too much uncertainty into the assessment because the details at that level of project development are not sufficiently determined.
- (QIA): certainty is not what cumulative effects is really looking at, certainty is not the goal, it is to ensure that all potential for cumulative effects for future phases or induced developments or strategic commitments should be taken into account, the level of detail may not be refined, but the types of activities, and infrastructure-associated impacts is sufficiently known to enable assessment of potential future cumulative effects. Although this may introduce greater uncertainty, that is not necessarily to be avoided. This uncertainty can be built into adaptive management and mitigation programs.
- (Baffinland): how much does this expansion of the scope of the definition fall to the regional regulators and potentially a more conceptual regional or strategic impact assessment exercise.
- (NTI): support the QIA's position of a more expansive definition of reasonably foreseeable projects.
- (Igloolik & Sanirajak HTOs): support more expansive definition (uses expanded Port of Churchill as an example; although this project is not in the regulatory queue yet, the policy drivers to make it happen are in place) and also referenced the scientific community projecting the catastrophic collapse of the current in the North Atlantic that could have significant effects on Arctic shipping. Although it is not yet certain what these effects will be, and no impacts have been identified as yet, shouldn't a "future reasonable scenario" include this potential?
- (GOC): supportive of the current definition. Recognizing the differing definitions of effects and impacts, shouldn't both cumulative effects and cumulative "impacts" be included? A clearer example of synergistic effects should also be used (should be multiple mechanisms, not a single mechanism).
- (GN): overall supportive of the current definition. Note that could include probable and plausible into future scenarios, but GN has questions regarding how including probable and plausible projects changes the temporal boundaries of the assessment of effects to reflect the uncertain timelines of probable and plausible projects in the regional context.

- (QIA) differentiates between planned projects (complete proposals, applications with full details), versus probable projects (future phase of existing projects where intention has been expressed with some detail, potentially induced developments, but may contain less detail), versus plausible projects (e.g. port of Churchill expansion—policy drivers in place, project description not provided)...the inclusion would look at whether these projects in general would affect or interact with project pathways (e.g. Churchill Port expansion effects interacting with Mary River Project shipping).
- (NIRB): How is the assessment of probable and plausible projects handled in the cumulative effects assessment, is it conducted separately from planned activities?
- (QIA): it is not hypothetical, but more likely using scenarios, assuming if a plausible project were to move forward this type of project and this type of infrastructure and activities generally can have this kind of impact.
- (GN): how far down the 100-year life of mine does Baffinland intend to go when they are assessing cumulative effects of the next stages of development in the life of mine (e.g. will the next reconsideration include in the CEA a timeline that includes the development of subsequent deposits beyond existing deposit 1?)
  - (Baffinland): this is already included in Baffinland's approach to assessment of subsequent stages.
- (ON): agree with QIA's submission that a broader definition of future projects would be useful (and should include non-permitted activities as well). NIRB should consider whether the definition of planned future activities should be clarified to include non-permitted activities. Also identifies that cumulative effects assessment should be considered even after reclamation and decommissioning (essentially through lifecycle of critical infrastructure until the effects associated with the infrastructure have stopped completely).
- (QIA): other human activities and combined effects—with respect to “other human activities” QIA questions what is included; also seek clarification of what “combined effects” means and the treatment of combined effects especially in relation to how combined effects of the project are handled
  - (Baffinland): don't think that you want to define ‘other human activities’ in the abstract, but rather what should be included in any specific assessment; Baffinland has looked at combined effects as those effects that are associated with the Project and within Baffinland's control and Baffinland would not typically categorize and assess those effects as cumulative effects which focus on effects that are not within Baffinland's control.

- (GN): agrees that combined effects from the Project can accumulate and would not want to exclude the project's combined effects from considering where those combined effects are interacting with other effects from other sources, would not want those effects to be excluded from the overall cumulative effects assessment.

## What updates to guidance should be adopted to improve the assessment of cumulative effects in future amendment applications?

### *Feedback Summary:*

- Parties requested clearer treatment of phased development, reasonably foreseeable future phases, and adaptive management thresholds/triggers.
- Stronger guidance requested for significance determinations, including how to distinguish the significance of cumulative effects on VCs from the Mary River Project's contribution to those effects.

### *Written Feedback:*

- (CIRNAC): additional clarity may be required concerning significance determinations for cumulative effects assessment and how climate change is considered (e.g., the significance of cumulative effects on Valued Components versus the significance of the Mary River Project's contribution to cumulative effects on Valued Components.)
- (DFO): recommend that guidance for future assessments direct that additional rationale be provided regarding significance considerations, including, for example, the reversibility of impacts.
- (GN) "past, present and reasonably foreseeable future development" can be considered as the cumulative effects from different phases of an overarching project, which may have been evaluated through distinct NIRB processes, rather than looking at projects from different proponents or industries.
- (GN) The absence of specific thresholds/triggers has been a noted gap in previous project-specific assessments and is a central complicating factor to project-specific monitoring. If thresholds/triggers were clearer in the EA process, perhaps there would be greater clarity and confidence in project effects from the different phases of the project and reduce the need for further assessment of cumulative effects.

### *Workshop Discussion:*

- GOC: More clarity regarding how significance determinations are made in relation to cumulative effects e.g. climate change (e.g. both the significance of cumulative

effects on Valued Components versus the significance of the Project's contribution to cumulative effects on Valued Components).

- (GN): cumulative effects must ensure that all parties understand and have clarity that phased developments of the same project need to be included in the “reasonably foreseeable future development” as this has been done in relation to Baffinland's current approach.
- (GN): asks whether there needs to be a tighter link between assessing cumulative effects and then adaptive management thresholds and triggers
  - (Baffinland): have some difficulty seeing how cumulative effect adaptive management thresholds might be different than project-specific adaptive management thresholds
  - (GN): what if for example the cumulative effects are premised on a certain level of shipping, and so the project effects and adaptive management thresholds are now exceeded; how is that captured and how do regulators ensure adaptive management kicks in to reduce the level of effects to the levels that were predicted in the Final Impact Statement.

## What geographic scale and temporal boundaries are appropriate for the development of the CEAF?

### *Feedback Summary*

- Many parties supported broader geographic boundaries tied to wildlife ranges, affected communities, watersheds, shipping routes, and regional ecological pathways. Several parties cautioned that the scope should remain reasonable and focused enough to support project-level assessment, with alignment with regional monitoring programs and associated indicators.
- Several parties recommended that Naujaat be included within the scope of potentially affected communities going forward.
- Temporal scope could extend from pre-project disturbance to post-closure/decommissioning or beyond to when the project is no longer having effects on selected Valued Components, while recognizing the challenge of uncertainty over long timeframe. Baseline data should reflect available Inuit Qaujimajatuqangit and extend to a timescale of what's within “Elders' memory”.

### *Written Feedback (Geographic Scale):*

- (NTI/GOC): support for broader geographic and temporal scopes for the CEAF while cautioning that quantitative data might not always be readily available.

- (QIA): If the CEAF for the Project is to be meaningful at such broad regional/geographic scales, then there must be alignment between monitoring programs by way of common (or multi-scaled) indicators and appropriate meta-data.
- (WWF): The geographic scale of the CEAF should reflect the full range of migratory marine and terrestrial species that may be impacted.
- (PC): Regarding Aquatic Invasive Species, spatial and temporal boundaries may benefit from reflecting pathways and biological risk, including a broader geographic scope encompassing settlement habits, dispersal zones, and key anchorages.
- (NRCan): recommend whole watershed and associated drainage area assessment of impacts to water quality.
- (WWF): The geographic scope of the CEAF should include all communities that may be affected by the Mary River Project, its component parts, and reasonably foreseeable future development.



Figure 2: Baffinland representatives participating in the workshop.

#### *Workshop Discussion (Geographic Scale):*

- (QIA): Geographic scope support for all 7 potentially impacted communities and geographic boundaries should reflect the marine and terrestrial boundaries of wildlife species and should also extend to include the new Tallurutiup Imanga Marine Park. The geographical scale must be sufficient to ensure cumulative effects and trends can be identified throughout the regional study area, and parties recognize that to achieve this, cooperation and integration of information from others and collecting data throughout the regional study area cannot be the responsibility of a single proponent.
- (NTI): Recognize that many of the wildlife being considered are migratory species that have long migratory routes that extend well beyond the project study area, but nonetheless may have many impacts along the migratory route that should be

included in the cumulative effects assessment. These geographic boundaries are not static but should be included in the geographic scope of cumulative effects assessment, (regional study area should reflect specific species' routes and distances travelled).

- (Baffinland): agree that the range selected should reflect the species but that geographic scope needs to be reasonable. For example, caribou range on Baffin Island may be appropriate but migratory birds that travel vast distances over several countries and continents may not be reasonable to set the geographic scope for a cumulative effects assessment at the entire migratory route.
- (Igloodik and Sanirajak HTAs): agree with WWF that geographic scope should be sufficient to reflect the ranges of migratory species.
- (CIRNAC): support expansion of the geographic scope to reflect the specific valued component, but there is a recognition that the Proponent may not be responsible for filling in some of the gaps in the data in the expanded geographic scale.
- (NRCan): due to fugitive emissions of mine dust, recommend that potentially affected watershed and drainage areas be included in the geographic scope of the assessment.
  - (Baffinland): already have included the three affected watersheds into existing geographic scope
- (PC): should include Ragged Island in the geographic scope to ensure frequent monitoring of the potential effects.
  - (Baffinland): there is already monitoring of potential for effects on Ragged Island; this would not be a change to the current approach to geographic scope.
- (GN): Geographic extent needs to be sufficient but not overly broad so that project level effects within Nunavut can be identified.
- (ON): regional monitoring needs a home. Qikiqtani SINAA Project and others should be taking greater role and responsibilities to be a more centralized research clearinghouse for the region.
- (WWF): all communities that rely on wildlife that could potentially be affected by a project should be included within the geographic scope of the CE Assessment.

#### *Written Feedback (Temporal Boundaries):*

- (QIA): recognize that today's valued components' conditions in absence of the project would not necessarily reflect past, pre-project conditions owing to the effects of other activities and natural or climate-induced change. Thus, temporal trends are likely more valuable for benchmarking the Project's contributions to cumulative

effects, and the magnitude of change, provided that such data exists to establish trends and to distinguish project contributions.

- (QIA): To adopt a future scope of consideration after closure and decommissioning is also a valuable approach to capture the full life cycle cumulative impacts of the project. The caveat is the high level of uncertainty involved in long-term projections, and how interactions will occur with future undertakings that are currently hypothetical or not even known.
- (Arviq HTO): support the temporal scope of the CEA including consideration for how the cumulative impacts of the Mary River Project will continue to be felt, and interact with other impacts, even after the closure and decommissioning.
- (QIA): The consideration of any future developments potentially interacting with Project effects post closure and decommissioning may not align with what is defined in the Discussion Paper as constituting “reasonably foreseeable” future development.
- (WWF): The temporal scope of the cumulative effects assessment should be expanded to better reflect the lifespan of the project, reasonably foreseeable future development, and other identified activities.

#### *Workshop Discussion (Temporal Boundaries):*

- (QIA): the boundary of the past should be based on baseline prior to any project construction and the future boundary should be set at the point where the project is no longer having impacts. Post-closure effects should be included in cumulative effects assessment to ensure that the post-disturbance effects are considered as the new baseline for the region in future project assessments.
- (Baffinland): agrees that the intention of reclamation and decommissioning is to prevent ongoing effects, but establishing stability and limiting effects is, to some extent, dependent on the specific valued component; some may meet no post closure effects in very short order, and others may not.
- (Igloolik & Sanirajak HTOs): baseline data in the past needs to reflect Inuit Qaujimagatuqangit (time scale should be “elder’s memory” to make sure this information is considered to create a full picture of baseline).
- (GN): agree with WWF regarding the extension of temporal scope but recognize that the trade off is that anticipation of reasonably foreseeable developments gets far less certain the longer the temporal scope.
- (ON): valued components’ “recovery” should be the time scope, which means the point at which the project is no longer having effects on the valued component, recognizing that some valued components will never be fully restored to pre-project

baseline (e.g. climate change effects could mean that ice cover won't return to pre-project conditions).

- (WWF): question whether the discussion about temporal scope is blurring the distinction between closure and post-closure periods; what is Baffinland's position?
  - (Baffinland): our assessment extends to closure only, with post-closure intended to be a period of stability, not necessarily a return to no project impact.

## What Valued Components (VC) should be the focus of a CEAF?

### *Feedback Summary:*

- There was broad support for including VCs identified by QIA and NTI, with parties recommending further additions or refinements.
- Suggested VCs included narwhal, caribou, employment/economy, bowhead, beluga, walrus, arctic char, migratory birds, underwater noise/acoustic habitat, ice cover, air/water/soil quality, country food, Inuit harvesting rights, and traditional Inuit economy.
- A recommendation was made to consider selecting VCs for the CEAF beyond those selected for the initial project evaluation where there may now be cumulative effects from other sources on these species that would, if the assessment were conducted today, make it necessary to include these species as a VC.
- Consideration for more emphasis to be placed on indicators rather than VCs for cumulative effects assessment and monitoring, providing a basis for the differences between project monitoring and cumulative effects monitoring.
- Several parties emphasized that VC selection should be informed and validated by Inuit, communities, HTAs/HTOs, and Inuit Qaujimajatuqangit.

### *Written Feedback:*

- (NTI): support the inclusion of the VCs recommended by QIA and referenced in the Discussion Paper.
- (NTI): The final VCs included in the CEAF should also be informed by Inuit engagement and further collection of Inuit knowledge and Inuit Qaujimajatuqangit.
- (NTI): VCs of interest, whether or not they have been assessed to have a residual impact or effect by BIMC, should be included in the CEAF.
- (QIA): consideration must be given to indicator effectiveness and selection, thresholds (including maximum levels of acceptable change), and ensuring alignment between VC indicators selected by Baffinland with other monitoring initiatives. Alignment of VC indicators is critical if the project-centered CEAF is to enable understanding of the Project's cumulative effects in a regional context.

- (QIA): Attention must also be given to whether VCs (and their indicators) included in existing government or other monitoring initiatives need to be revisited to ensure that such programs are adding value to understanding baseline conditions and effects at multiple scales. This further emphasizes the need to align monitoring and/or assessment programs, as noted in the Discussion Paper, to ensure a meaningful CEAF.
- (GN): Suggest concentrating on a small number of key valued components (VCs), such as narwhal, caribou, and employment, or on key project activities, such as shipping and trucking, which may help prioritize the most relevant pathways of potential cumulative effects. Setting an appropriate baseline will be an important foundation for assessing cumulative effects.
- (GN): Consider including Economy. Employment and access to training begets post-secondary education and career development begets increased skills in communities. Offshoot or induced impacts can include secondary/tertiary businesses and training/education in other fields. VCs could also be chosen by community representatives to decide on which VCs warrant more focus in the process.
- (ECCC): Encourage further discussion on the inclusion of additional marine taxa.
- (ECCC): Holistic approaches to considering cumulative effects (beyond Valued Components) should be considered in developing the CEAF.
- (WWF): Include bowhead and beluga, underwater noise and acoustic habitat, and a more detailed breakdown of the components included in “Inuit culture, resources and land use” including Inuit harvesting rights and quotas and the nutritional value of country foods in the list of VCs.
- (Arviq HTO): Impacts and effects from ballast water releases, noise, other shipping-related discharges, air and water pollution, impacts on ice cover and thickness, and ice dependent species, and other impacts, associated with the massive increase in shipping and ice-breaking through Foxe Basin, Hudson Strait, Davis Strait and within the Steensby Inlet must be included in the CEAF.
- (Arviq HTO): Relationship between direct impacts and indirect impacts, e.g. impacts to Baffin Island caribou that increase hunting pressure on mainland caribou and impact harvesting rights of Inuit.
- (Arviq HTO): Cumulative impacts on air quality, soil and water, and overall impacts on ecosystems, marine and terrestrial habitats and hunting rights, from deposition of dust must be included.

- (Arviq HTO): Narwhal is a keystone species for Arviq HTO, and must receive significant treatment as a VC, including in relation to its life cycle, habitat, food sources, migration routes and summering and wintering grounds.
- (Arviq HTO): The CEAF should include the following additional VCs: beluga whales, walrus, Hudson Bay caribou, the Lorillard caribou herd, barren ground caribou, bowhead whales, arctic char, arctic fox, musk oxen, and ptarmigan.

#### *Workshop Discussion:*

- (NTI): support the inclusion of the VCs as recommended by QIA and ensuring VCs are chosen to reflect what Inuit value and what communities have identified.
- (Igloolik & Sanirajak HTOs): traditional Inuit economy VCs should be specifically identified rather than just including this in the Inuit Culture and Harvesting VC. Also, should be aware that when we identify VCs for wildlife they don't reflect the holistic and ethical relationship with the non-human world (e.g. we don't talk about mice and rabbits because humans don't necessarily "value" these species, nor are they endangered, but this does not reflect the importance of these animals to the environment and the ethical)
  - (Baffinland): addresses how these issues (cultural VCs) and Inuit Qaujimajatuqangit are considered and reflected in their assessments.
- (GOC): supports VCs that QIA has identified and supported by NTI.
- (ECCC): bowhead whales and migratory birds should be included in the VCs; selection of cumulative effects (beyond VCs from the initial project evaluation) so that there could be a more comprehensive cumulative effects assessment
  - (Baffinland): two separate sets of VCs in relation to project assessment and cumulative effects assessment would be very difficult and not sure why there would be two different sets of VCs.
- (GN): VCs should be identified and validated by local Inuit and community VCs, would like to see more focused VCs arising from the primary project pathways when assessing the cumulative effects.
- (ON): more emphasis should be placed on indicators rather than VCs for cumulative effects assessment and monitoring and this could be the basis for the differences between project monitoring and cumulative effects monitoring. Indicators and thresholds should be chosen to reflect communities' perspectives on what is acceptable change (e.g. Arviq HTA's identification that they want to ensure that their grandchildren can continue to be hunters so that thresholds for displacement/disturbance of narwhal may be set as an indicator, rather than the project threshold of population level impacts on narwhal).

- (WWF): VCs bowhead and beluga, underwater noise and acoustic habitat, and a more detailed breakdown of the components included in “Inuit culture, resources and land use” should be added, and also agree with ON’s submissions.
- (ECCC): recognize that bird species not selected as VCs during the original Mary River assessment because project effects were limited, should be reconsidered for inclusion as VCs in the cumulative effects assessment because there may now be cumulative effects from other sources on these species that would, if the assessment were conducted today, make it necessary to include these species as a VC. ECCC recommends that a reconsideration of VCs in this light should be undertaken to identify all VCs that should be included in the CEA Framework.

## Consideration of Climate Change

### *Feedback Summary:*

- Support was expressed for integrating climate change into the CEAF, not only as GHG accounting but as a driver affecting VC condition and sensitivity.
- Parties asked for clarity on how climate scenarios would be used and how climate-related cumulative effects would influence significance determinations.

### *Written Feedback:*

- (CIRNAC): additional clarity may be required concerning significance determinations for cumulative effects assessment and how climate change is considered (e.g., the significance of cumulative effects on Valued Components versus the significance of the Mary River Project’s contribution to cumulative effects on Valued Components).
- (QIA): For future bounding, climate scenarios are valuable considerations in any CEAF, with the caveat to defining defensible future climate change scenarios is the possibility that significant (detrimental) changes in future VC condition or sustainability are identified/modelled even in absence of any further project effects. This is not a sound argument for poor project mitigation to reduce cumulative contributions; however, it is possible that such mitigations may have minimal influence on outcomes under certain plausible climate scenarios.

### *Workshop Discussion:*

- (QIA): points for Steering Committee to note: (1) recognize the difference between GHG emissions accounting versus contributions to climate change; (2) realizing that climate futures and climate projections can be fairly catastrophic even if all other effects remain constant (VCs need to be understood as perhaps already very stressed by climate conditions so some VCs may be more sensitive – e.g. climate change needs to be considered as both a driver of environmental changes that are

not project specific, but also contributing to the context of the VCs that needs to be including in the cumulative effects assessment e.g. climate change increasing sensitivity of some VCs to project effects)

- Baffinland indicates (supported by GoC) that their intention is to reference potential climate change effects in context of discussing each VC
- (ON): supports QIA's comments in relation to climate change considerations into the CEA Framework (WWF also supports these comments).

## What projects, activities and processes should be considered for development of the CEAF?

### *Feedback Summary:*

- Parties recommended consideration be given to adding projects and activities including: Port of Churchill expansion, Iqaluit Nukkiqsautiit Hydro Project, Grays Bay Road and Port, Chidliak, Aston Bay, Nanisivik Naval Port decommissioning/rehabilitation, military infrastructure/use, increased shipping, anchoring, emergency routing, and natural population cycles.
- Concern was expressed that regional shipping and induced development should be considered broadly, not only in relation to the marine environment.

### *Written Feedback:*

- (NTI): the northern components, the Milne Port, the Tote Road and the northern shipping route that are geographically separate from the southern components should all be assessed as contributing to cumulative effects.
- (NTI): recommend that due to the unique circumstances of the Mary River Project that the CEAF direct that project components of the Mary River Project be assessed as cumulative effects, as opposed to combined effects.
- (GN): Chidliak and the Iqaluit Nukkiqsautiit Projects are other proposed potential major development projects that may be considered and could be included. For example, employment and business development out of Iqaluit would overlap.
- (GOC): Specific projects, activities and processes to consider would depend on the timing of the updated assessment, and agreement on Valued Components and geographic and temporal boundaries.
- (GOC): highlight several recent regulatory submissions and/or investment announcements relating to projects that should be considered in an updated cumulative effects assessment of the Mary River Project (e.g., the Iqaluit Nukkiqsautiit Hydro Project, the newest iteration of the Grays Bay Road and Port Project, the Port of Churchill Plus, etc.).

- (ECCC): recommend consideration of relevant external drivers of wildlife population trends, including those unrelated to projects and activities (e.g., migratory influences and natural population cycles), to support more accurate interpretation of cumulative effects.
- (WWF): include Port of Churchill expansion, Milne Port as dual use military infrastructure, increased construction and shipping associated with the \$1B Arctic Infrastructure Fund, High Seas Treaty, and ongoing wildlife co-management processes.
- (Arviq HTO): support inclusion of all the activities listed in section 4.4 of the Discussion Paper in the CEAF.
- (Arviq HTO): cumulative shipping impacts associated with the anticipated high volumes of shipping to and from the proposed port on Steensby Inlet must also be assessed within the context of all shipping that will, or may occur, as other developments in the region are constructed and operated.
- (Arviq HTO): plans for development of the Port of Churchill and the associated large increase in shipping volumes from that port must be included in the CEAF. Projected international shipping passing through the region, even if not associated with particular regional projects or activities, must also be included in the scope of the CEAF.

#### *Workshop Discussion:*

- (QIA): Aston Bay Project should be added to the projects list.
- (Igloolik & Sanirajak HTOs): should separate Inuit cultural/traditional land uses and also Inuit recreational land uses and Inuit economic opportunities associated with tourism.
- (CIRNAC): Iqaluit Hydro, Grays Bay Road and Port, and Port of Churchill rehab and expansion should be added to projects list.
- (ECCC): natural population cycles should also be included under natural process.
- (DFO): agree that Hudson's Strait additional activities and intensification of current shipping should be included (and not just shipping, but also anchoring, emergency routing).
- (GN): Chidliak and Iqaluit Nukkiqsautit Projects and decommissioning and rehabilitation of Nanisivik Naval Port should be added.
- (ON): Military exercises should also include the addition of military infrastructure.
- (WWF): Building on military infrastructure should also include Baffinland's offering of port infrastructure at Milne Port to DND for military purposes.

## How should induced development/future phases for the Mary River Project be considered?

### *Feedback Summary:*

- Support was expressed for the approach taken in Baffinland's SOP2 application, distinguishing Deposits 2–3 as reasonably foreseeable and Deposits 4–9 as potentially induced.
- Others recommended consideration of broader scenarios, including development of other commodities within Baffinland's holdings and effects across marine, terrestrial, atmospheric, and aquatic environments.

### *Written Feedback:*

- (GOC): With respect to the consideration of induced development/future phases for the Mary River Project, supportive of the approach taken by Baffinland for the Sustaining Operations Proposal 2 assessment (i.e., consideration of Deposits 2-3 as reasonably foreseeable development and Deposits 4-9 as potentially induced future development).
- (NRCan): recommend additional scenarios for the project be considered, as appropriate, to capture reasonably foreseeable and potentially induced future developments.
- (WWF): Potential induced development of other commodities on Baffin Island, including those for which Baffinland currently holds rights (e.g. gold and base metals) should be included into the mapping of different development scenarios, alongside the full suite of identified iron ore deposits, including deposits 1-9 as referenced on page 40 of the Discussion Paper.

### *Workshop Discussion:*

- (Igloolik and Sanirajak HTAs): question whether the treatment of induced development in terms of cumulative effects is limited to the marine environment. If so, recommend that it should not be, but should also consider the terrestrial, atmospheric and aquatic environment .
- (GOC): agree with Baffinland's suggested approach in the SOP2 application to categorize reasonably foreseeable developments deposits 2-3 and induced developments would be the development of deposits 4-9.
- (GN): if we have sufficient information to suggest that one of Baffinland's future developments is reasonably foreseeable, induced effects would either be induced effects of the project or that future development.

- (Baffinland): an example of a hypothetical induced development could be a circumstance where there's a junior exploration company whose project could be made feasible because of its proximity to Baffinland's railway (once constructed).
- (WWF): recognizing Baffinland's statements made about its other holdings beyond iron ore, prospects for gold, base metals, etc., the CEAF could consider these within the scope of scenarios for induced developments.
  - (Baffinland): to the extent these activities were to come about, this would trigger additional assessments that would then become included in updated cumulative effects assessments for the region.
- (Baffinland): remind all parties to recognize that there is a trade off between extending temporal, geographic boundaries for CEA and consequently increasing uncertainty of the assessments. If the framework is to specify spatial and temporal boundaries, valued components etc. at the outset, at the point when Baffinland is to prepare another assessment and utilize the framework parties will need to accept the associated uncertainty that comes with that.

## Monitoring and Management of Cumulative Effects

After brief welcoming remarks and a review of the feedback received during Day 1 of the Workshop, Day 2 of the Workshop started with Baffinland leading participants through an overview of its environmental management system, providing context for how project-specific monitoring for cumulative effects is currently undertaken for the Mary River Project.

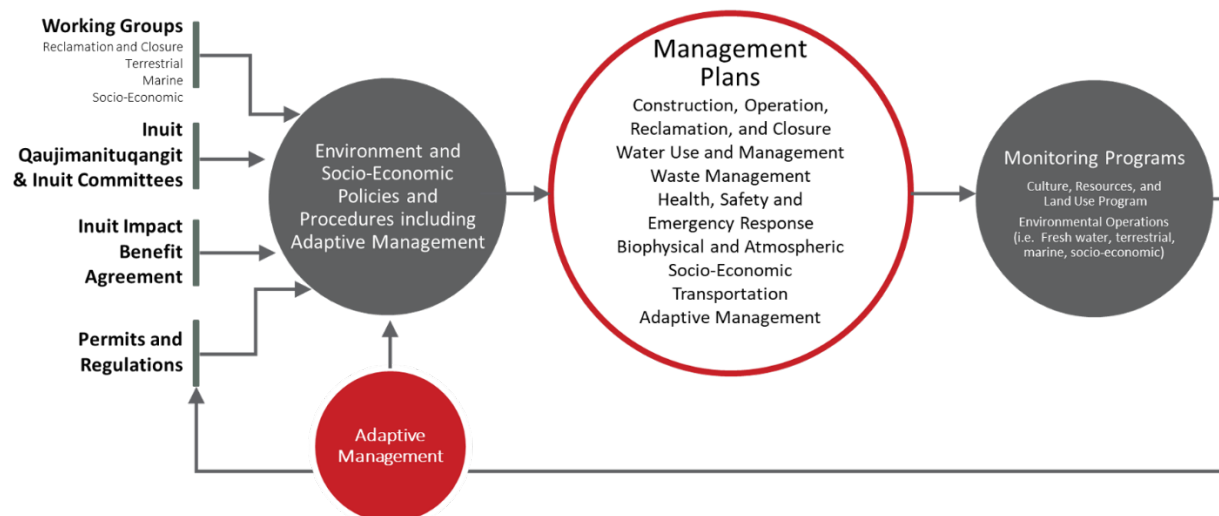


Figure 3: Baffinland's Environmental Management System.

## How could the monitoring report templates for the Mary River Project be improved to address potential project contributions to regional cumulative effects and enhance readability?

### *Feedback Summary:*

- There's a need for consistency in the review periods provided by the NIRB for reviewing Baffinland's annual reports, to allow for the required resourcing by reviewers. Recommend NIRB impose a strict submission date for Baffinland's annual report and a 30-day review period, with extensions on the review period granted to intervenors should a delayed release be received.
- Consider incorporating more plain-language summaries, visual materials, standalone summaries comparing predicted and observed effects, and clearer tracking of gaps, methodologies, Inuit Qaujimajatuqangit, community concerns, and actions taken.
- Document concerns and decision points of the Marine and Terrestrial Environment Working Groups (MEWG and TEWG), with tracking of actions taken to address.
- Current monitoring/reporting is not sufficiently accessible or responsive to Inuit concerns; consider using social media, short video clips and more visual presentation of information in reporting.

### *Written Feedback:*

- (QIA): largest challenge in completing comprehensive annual report reviews is a lack of consistency in the review period. Though NIRB has often provided 30-day review periods, Baffinland's release date has been inconsistent which is problematic from a resourcing perspective. Recommend that the NIRB impose a strict annual report release date on the Proponent and provide an annual review period of 30 days from the release date (with extensions on the review period granted to intervenors should a delayed release be received).
- (CIRNAC): recommend inclusion of a standalone summary which provides not only conclusions comparing monitored impacts with assessment conclusions, but also quantitative summary data (where available) for both.
- (NRCan): recommend inclusion of a section describing how any gaps or inconsistencies in monitoring methodologies were (or could be) addressed, as well as how engagement has informed any changes in monitoring.
- (GN): Consider whether simple plain language one-page documents or visual representations of current monitoring work that is being undertaken by the proponent may have a place in communicating annual monitoring results. This could be a good first step, to ensuring that there is an understanding of the monitoring information and

work done to detect project effects currently and what are the results before moving to more complicated analyses.

- (GN): Further clarity on what the potential outcomes might be here would be appreciated, to close the gap between what information is being collected and what communities/public would like to know.
- (GN): Monitoring and reporting must fit the needs of the Mary River project and the North Baffin communities, however ensuring that reports can be compared with other projects, regions would be valuable. Consideration for monitoring and reporting to satisfy the Mary River CEAF may lead to streamlining regional reporting initiatives.

#### *Workshop Discussion:*

- (QIA): lack of consistency in terms of time period allowing commenting parties to review annual reporting, want to see more consistency from Baffinland in submission of completed documentation and NIRB in terms of a consist comment period.
- (Igloodik and Sanirajak HTAs): the monitoring program to date has failed the Inuit communities that I represent, the processes are not very friendly to traditional knowledge input and people being able to participate; it's too technical and people aren't getting good explanations . I think that a new environmental process needs to be held for the approval of Steensby Inlet and a new Project Certificate needs to be issued because current monitoring is not community friendly and does not invite Inuit and community participation. It is unclear that if parties invite Inuit to share Inuit Qaujimajatuqangit that those same parties will actually listen to it and respond to it. Monitoring is very important, we need these discussions but we need to ensure Inuit are able to participate in a more robust way and are listened to.
  - (Baffinland): understand the frustration if that's how you've taken what this process looks like, but that's not the process or what Baffinland's done in its monitoring reports. Membership in the Working Groups includes all 5 affected communities, and some discussions are technical and are intended to be technical as there needs to be a forum for that. Sweeping statements about the broken process and failures of the process are disingenuous and are not helpful.
  - (Igloodik and Sanirajak): there is a misfire, here, everything is not fine and we need to find a way to make improvements to these processes.
- (CIRNAC): recommend that a standalone summary of monitoring results compared to predicted effects be provided.
- (NRCan): recommend annual reporting should show how gaps between monitoring results and predictions are being addressed and this information should be directly tied to the monitoring year.

- (HC): perhaps looking at reporting periods that are different/longer in relation to cumulative effects specifically, so that parties can see and comment on trends rather than just as part of the annual monitoring cycle.
- (GN): plain language materials are necessary and a possible solution would be revamping reporting to document concerns and Inuit Qaujimajatuqangit shared with Baffinland and then identify how this information was integrated into monitoring and mitigation measures and project operations and how it might be connected to the monitoring results for this year—explicit recognition of the concerns expressed and the linkage to actions taken or that will be taken.
  - (Baffinland): explains what they currently do and asks for what GN's recommendations would look like from a practical perspective.
  - (GN): perhaps just putting in a single table/section and that makes it easier to track concerns expressed, Inuit Qaujimajatuqangit shared and actions Baffinland has taken to address them.
- (ON): building on GN's information, would like to see the MEWG and TEWG concerns and tracking of actions and also identifying decision points of the MEWG and TEWG.
- (WWF): echoes GN and ON's points. Timing of reporting and relationship of that reporting to Working Group meetings; more focused reporting deadlines to line up better with MEWG and TEWG to enable the meetings to have a more robust discussion.
- (NTI): encouraged to hear that there's a translated popular summary. Would repeat and acknowledge frustrations from communities trying to access information, consider whether there's other modes of disseminating this information. Perhaps social media use, community radio shows, short video clips and more visual presentation of information.

## What other sources of research and monitoring information are available to support project-specific cumulative effects assessment and management?

### *Feedback Summary:*

- Additional research reports and databases have been identified and will be provided to the NIRB for consideration following the workshop.
- Transport Canada and Oceans North are involved in relevant marine shipping research which can inform project assessment/monitoring efforts.
- HTA/HTO-led research may be eligible for private funding and can assist in providing control over its dissemination and use.

### *Written Feedback:*

- (QIA): As the CEAF progresses (i.e. once valued components (VCs) are selected), it will be essential to turn greater attention to the specific nature of these programs or data sets to determine their utility. Consider results from the previous analysis of the NWT Cumulative Impact Monitoring Program.
- (WWF): There are several community-led and independent research and monitoring studies that should be reviewed to support project-specific assessment and management. Baffinland-funded research and monitoring need to be supported and complemented by third-party independent studies to avoid a conflict of interest.



*Figure 4: Workshop participants engaged in discussion.*

### *Workshop Discussion:*

- (QIA): has identified various opportunities to improve the Working Groups.
- (Igloolik & Sanirajak HTOs): should start MEWG and TEWG Meetings with the concerns heard from communities as a priority. There may be some private research funding coming to support HTAs and HTOs to conduct research over which they will assert data sovereignty, including control over dissemination and use.
- (ECCC): has identified 5 more research reports and two additional databases that could be relevant and will be submitting the links to these after the Workshop.
- (ON): advises that Transport Canada has a cumulative effects in shipping study underway out of Cambridge Bay and will be adding the Foxe Basin to this study. ON provides an overview of their ongoing research programs near Pond Inlet and the addition of hydrophones to Foxe Basin and indicates information will be made available as the data from these initiatives is reviewed and analyzed.

## How can we improve coordination across governments, proponents, academia and other stakeholders for research and monitoring to inform regional cumulative effects management?

### *Feedback Summary:*

- Agreement around the need for better alignment of indicators, metadata, monitoring methods, and data governance.
- Suggestions included a regional database or repository, a cumulative effects secretariat or coordinating mechanism, stronger roles for Working Groups, and better integration with NGMP and other regional initiatives.
- Inuit data sovereignty, HTA/HTO-led research, community-based monitoring, and independent third-party studies are important to consider going forward.

### *Written Feedback:*

- (QIA): If the project CEAF is to be meaningful at broader regional/geographic scales, then there must be alignment between monitoring programs by way of common (or multi-scaled) indicators and appropriate meta-data. This must be a priority of developing the CEAF initiative.
- (QIA): If there is no regional coordinating mechanism (e.g. cumulative effects secretariat) with clear governance responsibilities, there is risk of the CEAF not meeting expectations beyond assessing the project's effects. The importance of a data governance or coordinating structure warrants much greater attention.
- (GN): it is understood that the objectives of CEAF for the Mary River Project including helping understand better ways to improve project management, monitoring and understanding of real or perceived effects and impacts that communities have identified with respect to project effects and should not be an exercise to direct higher-level monitoring or research to occur.
- (ECCC): highlight national and international efforts to coordinate monitoring approaches to support regional cumulative effects assessments, including the Arctic Council's Conservation of Arctic Flora and Fauna (CAFF) Circumpolar Biodiversity Monitoring Program (CBMP) and the CircumArctic Rangifer Monitoring and Assessment (CARMA) Network. Consideration could be given to how such work can inform improved coordination across governments, proponents, academia and other stakeholders.
- (WWF): Due to the number of rightsholders and stakeholders contributing to local research and monitoring efforts, it would be prudent to create a database that collects, summarizes and shares all known work in the region, while also respecting Inuit data sovereignty. Such a database would allow all rightsholders and

stakeholders to upload relevant research, provide contacts for collaboration, and provide an overview of all regional research to avoid duplication and overlap.

*Workshop Discussion:*

- (QIA): would help if there were core questions identified for what may be necessary to improve cumulative effects monitoring – this may be very helpful for academics and researchers to have guiding questions and this would go a long way to ensuring that research can be targeted in relation to cumulative effects specifically. Emphasize that the written comments provided on this topic should be considered by the NIRB.
- (NTI): has established a research department focused on research and monitoring directly, recognizing the desire of and aspirations of Inuit to maintain data sovereignty and to lead or co-lead research activity that is required. This department will ensure that Inuit have a greater voice and truly consent to the research being conducted and their participation in the research and ensuring that their knowledge, perspectives and values are realized in relation to research conducted in their communities. Article 5 of the Nunavut Agreement makes it clear that Inuit must be part of the research.
- (Igloolik and Sanirajak HTAs): may be able to consider coordinating research, recognizing that the HTAs will exercise sovereignty over their data as a priority.
- (ECCC): reiterates that there are links to additional research that will be provided after the meeting.
- (GN): clarifies that the premise of their comments are to identify programs, but don't think that the CEA Framework should be making recommendations to other parties that may be conducting regional monitoring, other than the Proponent. For example, regional monitoring programs for caribou are not designed or intended to monitor for project effects, and/or cumulative effects, so although coordination with the measures taken under the CEA Framework may be advisable, the CEA Framework recommendations should not be directed to add elements or be modified to reflect project effects monitoring.
- (ON): Nunatsiavut and Scripps Oceanographic Institute also have hydrophones near the National Park. From ON's perspective, the functions of the various programs need to be coordinated. Question what the governance process is when new information is received so that everyone has an agreed set of facts to go forward. The Working Groups being chaired by an independent third party is the start, but there likely needs to be a reaffirmation of the commitment to receiving and then accommodating expert information from regulators and others.

- (WWF): in relation to our written comments, on this point, it is pretty difficult to consistently access research and other information when there is no single database or repository for this kind of information. Maybe this is a preliminary starting point in the CEA Framework, a recommendation to establish a database.

How are regional research and monitoring initiatives and their associated outcomes informing project-specific monitoring and adaptive management approaches? Do the Working Groups established under the PC have a role in bringing this information in for consideration?

How are the outcomes from the Project-specific monitoring program informing regional cumulative effects monitoring? Is there a role for the Nunavut General Monitoring Program?

The additional questions above were posed by the workshop facilitator to further explore the potential linkages between project-specific monitoring and regional monitoring for cumulative effects.

#### *Feedback Summary:*

- Relevant research and monitoring initiatives should be considered and “brought into” project-specific monitoring and adaptive management. The Working Groups established under the Project Certificate can be used to implement research sharing and collaboration.
- NGMP has an important regional role and could contribute to oversight and support for research required to support regional monitoring initiatives that could feed into cumulative effects assessment in the region. Scalability and integration of information from the CEA Framework into the NGMP will be important.
- Need to promote collaboration while recognizing independent roles, authorities and autonomy for wildlife management. HTOs play a key role in carrying out community-based monitoring initiatives. Independent monitoring is vital and working.
- Consider opportunities presented by Nunavut devolution and finalization of the Nunavut Land Use Plan.

#### *Workshop Discussion:*

- (Baffinland): new terms of reference (TOR) for the Working Groups have been adopted by the central independent Chair and new TORs could be added to formalize the research sharing role.
- (Baffinland): has several examples of cooperation with GoC and GN with various monitoring programs (e.g. GN’s general caribou monitoring jointly carried out so that

there is no duplication of tagging program, but that it also reflects the project-monitoring needs).

- (Baffinland): provides an example of when their project-monitoring informed the DFO's decisions about the movement of narwhal populations in Eclipse Sound in their narwhal management priorities.
- (QIA): agree that research and monitoring initiatives should be considered and "brought into" project-specific monitoring and adaptive management. See this as an opportune time (devolution and Nunavut land use plan finalization) to try to coordinate, collaborate and centralize availability of these types of information.
- (NTI): see the central role of HTAs and HTOs in research and in community environmental monitoring, as it makes sense that they would be the first ones who would observe changes in the environment and who would experience them most directly. Fully endorse the collaboration amongst all parties, but recognize there still remain divergences of opinion between DFO, HTAs, HTOs, QIA and NTI in relation to wildlife management, and so parties must still keep their own autonomy.
- (NTI): the NGMP could play a major role in providing oversight and support for research required to support regional monitoring initiatives that could feed into cumulative effects assessment in the region.
- (Igloodik & Sanirajak HTOs): HTOs could be central participants in carrying out community-based monitoring initiatives. As HTAs and HTOs increasingly are funded to conduct their own research, they may be interested in sharing their research to better understand the cumulative effects being observed in the region. Perhaps the NGMP has a role to play as the central clearinghouse for all the research initiatives that are being undertaken in the region.
- (Naujaat HTO): we have received research that we prepared regarding sound levels in our area and we are concerned about the sound levels by 2030.
- (GOC): clarifies technical review role and responsibilities of CIRNAC for water licences and project certificates and also the role of CIRNAC for enforcement of terms and conditions in water licences and project certificates.
- (DFO): notes coordination, collaboration but independent monitoring is key and working. Views the Working Groups as a central mechanism to implement research sharing and collaboration.
- (GOC): speaks to NGMP as established under Article 12.7.6 of the Nunavut Agreement and the NuPPAA, to support decision-making as part of the cooperative management regulatory structure. The CIRNAC co-managers of the NGMP Steering Committee will be replaced by the GN post-devolution. NGMP.ca is the new website and is the central repository of information about the NGMP. We are working to

advance a draft of the monitoring plan, focusing on selecting key indicators that will support monitoring and reporting on the environmental health of Nunavut.

- (GOC): NGMP works with the Regional Socio-Economic Monitoring Communities chaired by the GN and also participates in some of the project-specific socio-economic monitoring committees established in Nunavut under NIRB Project Certificate. NGMP is currently in a strategic planning process and will be considering how it can inform regional cumulative effects monitoring efforts of GoC, GN and others. Public reporting processes are going to be introduced.
  - (NIRB): asks whether in the process of the NGMP's selection of key indicators/VCS any thought has been given as to whether the CEA Framework should be aligned with the NGMP indicators/VCS chosen by the NGMP.
  - (GOC): not expressly, NGMP can share the VCS/indicators they have chosen for the "general" plan, but would not suggest that this list would necessarily be appropriate for adoption/alignment of the project-specific CEA Framework
- (GN): Working Groups do have a central role and are well-positioned to fulfill this role. We see the NGMP occupying an important regional role, that of course extends well beyond the requirements of the CEA Framework. See GN's participation in the CEA Framework as building awareness and sharing information about how the information coming out of the CEA Framework can be best presented to be incorporated into the NGMP.
- (ON): scalability and integration of information from the CEA Framework into the NGMP is important.
- (WWF): study quoted by the Naujaat HTA has been presented at the Arctic Net Conference recently and lately to the Regional Wildlife Management Boards; publicly available resource will be provided in future.

## Next Steps in the Development of the CEA Framework

At the closing of the workshop the NIRB reviewed the key deliverables and timelines that have been provided to date for the development of the Cumulative Effects Assessment Framework, both in the Discussion Paper and related NIRB correspondence.

- **Project Charter:** outlines what the initiative is about, identifies goals and priorities for development of a CEAF and who will be involved in the Steering Committee
- **Discussion Paper:** sets out foundational knowledge to generate feedback and help advance the development of a CEAF
- **Interim CEAF Report:** details feedback received from community sessions, written submissions and CEAF Workshop, and identifies preliminary findings

- **Final CEAF Report:** provides updated cumulative effects assessment guidance for future applications, identifies potential improvements for the monitoring, management and mitigation of cumulative effects for the approved project, and delivers findings on how to improve the understanding of the contribution of the Mary River project to regional cumulative effects

|                         |                                                                     |
|-------------------------|---------------------------------------------------------------------|
| April 30, 2026:         | •NIRB issues CEAF Discussion Paper for public review and feedback   |
| May 9-15, 2026:         | •NIRB hosts community information sessions for CEAF development     |
| June 1, 2026:           | •Written comments received on Discussion Paper                      |
| June 9-10, 2026:        | •NIRB hosts CEAF Workshop in Iqaluit                                |
| July, 2026:             | •NIRB issues Summary Report from community visits and CEAF Workshop |
| September, 2026:        | •NIRB issues Interim Report on CEAF and preliminary findings        |
| October, 2026:          | •Comments received on Interim Report on CEAF                        |
| October/November, 2026: | •NIRB hosts CEAF Workshop in Iqaluit                                |
| November, 2026:         | •Final Written Submissions received                                 |
| February/March, 2027:   | •NIRB issues Final Report on CEAF                                   |

Figure 5: CEAF Process Timeline as outlined in the April 30, 2026 Discussion Paper.

#### Written Feedback:

- (NTI): the CEAF must be informed and developed considering Inuit knowledge, and particularly Inuit Qaujimajatuqangit, of all the affected communities and HTOs. The methodology of a comprehensive CEA, and subsequent monitoring and mitigation measures, must directly involve communities and use Inuit Qaujimajatuqangit and western science equally.
- (WWF): Insufficient time was provided for interested parties to provide comprehensive and meaningful feedback on procedural steps related to the CEAF and Mary River Project. Comments should be considered as initial, and we urge the NIRB to provide additional time to interested parties to engage in meaningful ways with these processes.
- (Arviq HTO): The discussion paper and supporting materials are very detailed and technical. Consequently, the 30-day review period is much too short to permit an in-depth review of the material or the implications of what is set out in the materials. An additional 60 days is requested to review these materials, consult with elders and scientists, and provide more detailed comments on the discussion paper.

- (Arviq HTO): concerned that not enough time has been allocated for the overall CEAF process, particularly for engagement with impacted Inuit hunters, rightsholders and impacted communities.
- (Arviq HTO): Further time should be built into the CEAF process to allow Arviq HTO time to gather Inuit knowledge and expertise, and for western scientific reports to help inform a fulsome cumulative effects assessment. More funding should be made available to support these efforts. At present, the CEAF process structure does not allow for detailed submissions and only provides for comments on draft and final materials prepared by others.

#### *Workshop Discussion:*

- (QIA): recommend consider providing a summary report and an interim report – take those reports a step further, provide interim and preliminary recommendations so that parties have more opportunity to comment on process flow and expectations – especially flagging differences in opinion and how these issues could be dealt with by decision-makers.
- (NTI): seeking clarity that online session will be the same as the other community sessions; suggest having community members updated on existing status of the project up to date and then moving onto this process when all community members have an updated understanding of the current status of the project.
- (Igloolik & Sanirajak HTOs): would like to continue to participate and would like to know from NIRB where are the limits to shipping and mining on the original project based on the original assessment.
- (Naujaat HTO): we are at the planning stage identifying what we want to deal with and what kind of funding we can get for the process moving forward. We would like to have additional time to prepare our comments in relation to the Discussion Paper and this project.
- (GOC): have heard concerns about the timelines and support having a longer commenting period ahead of the next workshop; also would support the QIA's recommendations to include interim recommendations and findings.
- (GN): underscore NTI's view on the need to have the context and status of current project before the communities.
- (ON): support NTI and GN's view.
- (WWF): also support NTI and GN's observations. Note that the parties also are involved in other aspects of the monitoring and management of the project and urge the NIRB to ensure that timelines reflect the resource constraints of all of these parties.

### *Other identified areas of interest*

- (Naujaat HTO): numerous comments shared throughout the workshop on the community's concerns regarding components of the project that have not yet been developed (i.e. railway, Steensby Port and associated shipping), operating plans and terms and conditions of project approval, impacts of the current project to marine mammals and caribou, and request for the community's involvement in this initiative going forward.
- (Igloolik & Sanirajak HTOs): continue to take the position that there needs to be a new assessment of the original Mary River Project (Steensby, shipping via Foxe Basin and Southern Railway)
- (GN): the CEA Framework should clarify for communities that the cumulative effects assessment framework development is not intended to be a new cumulative effects assessment of the existing approved project.
- (ON and WWF): NIRB clarification of what the limits are in the Project Certificate for the approved project is important and should be provided.

## Potential Action Items Identified

Following a review of the feedback collected through the community information sessions, written submissions on the Discussion Paper and discussions at the in-person Workshop, the following potential action items have been identified and should be considered by the NIRB, the CEAF Steering Committee and key parties in developing the CEAF going forward:

### *NIRB and CEAF Steering Committee:*

1. Schedule and facilitate an additional virtual information session for communities unable to attend in-person sessions, ensuring all relevant communities have opportunity for input.
2. Produce a summary report of workshop feedback and circulate it publicly, ensuring that feedback from communities and written submissions is considered in the CEAF development.
3. Consider further refinements to the definition of "reasonably foreseeable future development", including how probable and plausible future developments are to be considered and distinguished from speculative projects.
4. Provide further guidance and examples of how non-permitted activities (e.g., vessel traffic not associated with the project) and induced developments will be considered.
5. Ensure that the framework and future guidance documents address the treatment of combined effects versus cumulative effects and clarify their distinction for assessment and management purposes.
6. Coordinate with relevant government departments and organizations to determine availability of regional baseline data and potential alignment of monitoring programs, especially for broader geographic and temporal scopes.
7. Engage with communities and Inuit organizations to validate the list of valued components and acceptable levels of change, including specific indicators relevant to Inuit use and values, ensuring inclusion of Inuit Qaujimajatuqangit and input from all affected communities.
8. Update the list of projects, activities, and processes to be considered, based on feedback received.
9. Provide further guidance on how climate change will be explicitly considered for each valued component.
10. Consider and address the trade-off between expanding the scope of the assessment (geographic, temporal, and in terms of included activities) and increased uncertainty, ensuring this is reflected in the framework and assessment expectations.

11. At the next workshop/session, provide further clarification and examples regarding the inclusion of valued components not originally considered in project-specific assessments, particularly in light of regional data and holistic approaches.
12. Provide guidance on how value components not originally selected for the project will be considered in the CEAF, particularly where new information or cumulative effects suggest their inclusion.
13. Ensure that the framework includes flexibility to add or modify valued components and indicators as new information becomes available or as community priorities change.
14. Consider the inclusion of military and dual-use infrastructure in the list of activities for cumulative effects assessment and clarify the process for their inclusion if/when such uses are proposed.
15. Ensure that the framework addresses the consideration of induced development and future phases of the Mary River Project, distinguishing between reasonably foreseeable, induced, and more speculative developments, and incorporating relevant scenarios as appropriate.
16. Produce a public report specifying the scope of what has been assessed and approved for the Mary River Project, including clarification on activity limits, tonnage limits, and key aspects of the Project Certificate terms and conditions.
17. Consider options for pre-workshop information sessions for community delegates to ensure they are briefed and prepared to participate meaningfully in future workshops.
18. Clarify and communicate the final decision-making process and next steps after the Final CEAF Report is delivered to the responsible Minister(s).
19. Ensure all monitoring data and reports (including popular summaries) are made accessible to communities in both English and Inuktitut, and explore additional dissemination methods (radio, social media, etc.).
20. Adjust timelines for the CEAF process as needed to ensure adequate community and participant engagement, and communicate updated timelines to all parties to ensure adequate time for preparation and engagement.
21. Ensure the interim and final CEAF reports address how project-specific monitoring results inform regional cumulative effects monitoring, and vice versa, including the role of NGMP and other regional initiatives as applicable/relevant.

#### *Baffinland:*

1. Share updated information to the public and NIRB on shipping route selection, vessel logistics, and monitoring programs for the Steensby area as it becomes available and respond to community/HTO requests for information on project plans.

2. Ensure all monitoring data and reports (including popular summaries) are made accessible to communities in both English and Inuktitut, and explore additional dissemination methods (radio, social media, etc.).
3. Continue to engage directly with HTOs (including Naujaat) upon invitation to share project information, address concerns, and receive feedback outside of formal processes as needed.
4. Review and, if needed, update the terms of reference for Working Groups to explicitly include cumulative effects considerations, particularly with the new independent chair.

*Qikiqtani Inuit Association:*

1. Continue to improve communication and coordination with HTOs and technical advisors, including sharing information on Inuit Stewardship Program and other relevant initiatives.

*NGMP Secretariat/Steering Committee:*

1. Bring feedback on the need for project-specific monitoring data to inform the Nunavut General Monitoring Plan (NGMP) and consider how to better integrate project data into regional monitoring and reporting, including public accessibility.

*All Parties:*

1. Collaborate to identify and align key cumulative effects questions and monitoring priorities across all relevant research and monitoring programs and consider development of a central database/resource for sharing results and data, respecting Inuit data sovereignty.
2. Use Working Groups established under the Project Certificate to share current and planned research/monitoring, and to discuss how cumulative effects questions can be integrated into ongoing and future monitoring programs.

## Appendix A: Workshop Agenda

### DRAFT AGENDA FOR THE CUMULATIVE EFFECTS ASSESSMENT FRAMEWORK WORKSHOP RELATED TO BAFFINLAND'S MARY RIVER PROJECT

|                            |                                                                                                                                                                                                                                                                                          |
|----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>NIRB File No.:</b>      | 08MN053 – Mary River Project                                                                                                                                                                                                                                                             |
| <b>Proponent:</b>          | Baffinland Iron Mines Corporation                                                                                                                                                                                                                                                        |
| <b>Formats:</b>            | In-person and MS Teams (English and Inuktitut)                                                                                                                                                                                                                                           |
| <b>Facilitator:</b>        | Ryan Barry, Red Clay Environmental Solutions Inc.                                                                                                                                                                                                                                        |
| <b>In-person location:</b> | Cadet Hall, Iqaluit, NU                                                                                                                                                                                                                                                                  |
| <b>Dates:</b>              | June 9-10, 2026                                                                                                                                                                                                                                                                          |
| <b>Times:</b>              | 9:00 am – 5:00 pm EDT                                                                                                                                                                                                                                                                    |
| <b>Note:</b>               | Times are approximate and subject to change at the NIRB's discretion. Breaks for lunches will be approximately 1 hour, and a 15 minute health break will be provided each morning and afternoon. The NIRB may include additional evening sessions to the workshop on an as-needed basis. |
| <b>Note 2:</b>             | This is an informal workshop and no transcript will be kept, though meeting notes may be taken. Recording any audio/video or images of the workshop without the express written consent of the NIRB is prohibited.                                                                       |
| <b>Note 3:</b>             | Reflecting the nature and progress of discussions, the NIRB may use breakout groups to facilitate discussions during the workshop.                                                                                                                                                       |

#### Day 1 – Tuesday, June 9, 2026

1. Opening Remarks
  - i. Housekeeping items
  - ii. Overview of CEAF development
  - iii. Overview of workshop objectives
  - iv. Review of agenda
2. Introduction of parties
3. Feedback from community tour and written submissions
4. Defining cumulative effects
  - i. Reasonably foreseeable future developments
  - ii. Other human activities
  - iii. Treatment of combined effects
5. Assessing cumulative effects
  - i. Phased development approaches

- ii. Significance determinations
- iii. Geographic scale
- iv. Temporal scope
- v. Valued Components
- vi. Consideration of climate change
- vii. List of projects/activities/processes
- viii. Treatment of induced development/future project phases

Close of Day 1

## **Day 2 – Tuesday, June 10, 2026**

- 6. Opening remarks
- 7. Monitoring and Management of Cumulative Effects
  - i. How cumulative effects are monitored for the current approved project
    - i. Role of the TEWG and MEWG
    - ii. Adaptive management approaches and how new information informs development of approved and unconstructed project components and activities
  - ii. Improving communication of monitoring results
  - iii. Distinguishing project-specific effects from broader regional changes
  - iv. Identifying research and monitoring that can support management of project effects or be informed by project monitoring
- 8. Next steps in the development of a CEAF
- 9. Closing Remarks

Close of Day 2