

Baffinland Responses to World Wildlife Fund – Canada

Comment Number	Comment	Baffinland's Response
1	The Annual Report frequently directs readers to the above appendices for more information. However, these reports have not yet been published, making it difficult to properly assess and review the monitoring efforts referenced in the Annual Report. Sending these reports out for public comment after comments are due on the Annual Report, as suggested by the NIRB, is inconsistent with previous reporting periods and an ineffective approach to project monitoring. Conclusion/Request: To support an efficient and informed review process, requests for comment should be deferred until all appendices and supporting documents are available, or the review period should be extended to allow concurrent consideration of all relevant project information.	The missing elements of the annual report including the final marine monitoring (MEEMP and BH) reports are not available. Once these items are available, they will be posted to the NIRB website for review.
2	It is noted that Baffinland is currently in the process of updating the SMWMP "to include the construction Phase of Steensby prior to any winter shipping (p. 311). Past Environmental Working Group meetings have also noted that various management plans for the construction and operational phases of the Steensby railway and port are being updated and developed. However, the status of these management plans remains unknown, making it difficult to assess these plans against the project's terms and conditions. Conclusion/Request:	Thank you for your comments. Baffinland is in the process of working with QIA on revisions to the Management Plans. These will be shared through the MEWG and TEWG when appropriate. The 2026 annual report will include a status update.

	WWF-Canada requests clarification on the status and anticipated release dates of the management plans for the Steensby Component and expects these plans to be made available for public review and comment well in advance of the commencement of construction activities	
3	Throughout the Annual Report, total vessel activity is reported as individual ore carrier round trip voyages, and not as independent one-way transits, making it difficult to determine the true level of vessel presence and associated disturbance within the RSA. To WWF-Canada's knowledge, Baffinland does not provide standardized information on the composition of their convoys, making it difficult to assess the company's own targets (a 15% reduction of independent one-way transits through the RSA) and/or if the use of convoys is in fact a genuine reduction in vessel activity. WWF-Canada is particularly concerned that convoying could be used to increase shipping activity while appearing to maintain or reduce the number of reported transits. Given that the Project Certificate establishes limits on vessel transits, clear and transparent reporting is needed to ensure that transit numbers reflect actual vessel movements and associated environmental pressures, rather than changes in how vessels are grouped together and counted. WWF-Canada also expresses skepticism regarding the environmental benefits attributed to convoying in this context. In reporting on T&C 105, Baffinland describes convoying both as a means to "reduce total sound exposure" and as a "mitigation method to reduce the number of vessel transits through the RSA." With respect to underwater noise, convoying is a traffic	Baffinland would want to reiterate that it's underwater acoustic monitoring results and narwhal behavioural data collected to date have demonstrated that shipping noise in the RSA is lower than predicted in the FEIS and FEIS Addendum, and that behavioural effects from shipping on narwhal are limited to low-level disturbance effects that are localized and temporary in nature. Convoy use is not pre-planned but occurs opportunistically when operational and environmental conditions allow vessels to travel together. For reporting purposes, a transit represents a transportation event rather than an individual vessel call. Accordingly, when two or more Baffinland-contracted vessels travel together as a convoy to Milne Port, the coordinated movement is counted as one convoy transit event. The vessels comprising the convoy remain captured separately in annual vessel-call reporting; in 2025, 49 vessels called at Milne Port. This approach maintains a distinction between the frequency of operational transit events and the number of individual vessels calling at the Port and avoids conflating these two measures. In 2022, Baffinland submitted to the NIRB, the Narwhal Adaptive Management Response Plan (NAMRP) this has a fulsome explanation for how convoys function and the benefit using them.

	management measure that alters the timing and distribution of vessel activity. Any resulting environmental benefit depends on factors such as convoy composition, vessel spacing, speed, timing, and how individual species respond to acoustic disturbance. It is further noted that Baffinland's application of convoying results in ships idling outside the RSA, which can contribute to additional ocean noise, pollution, and emissions. However, Baffinland has previously indicated that convoying is implemented on an opportunistic basis, and little information is publicly reported regarding convoy structure or operation, making it difficult to evaluate whether convoying achieves a measurable conservation benefit. This is especially concerning considering there are no measures in place to ensure that convoying does not overlap with the timing of critical biological processes, like migration, calving or feeding. WWF-Canada is also concerned by claims that convoying reduces the number of vessel transits through the RSA. Convoying changes how vessels travel, not how many vessels travel. If multiple vessels within a convoy are being reported as a single transit, then convoying does not reduce the number of vessels operating within the RSA. Any claimed reduction in transits should therefore be clearly explained and supported by transparent reporting of convoy activity. Conclusion/Request: Convoying should not be used to reduce reported transit numbers. WWF-Canada requests clarity on how Baffinland identifies, counts, monitors, and	
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	reports convoys including the number of individual vessels in each convoy, the timing and duration of each convoy, vessel spacing, route, speed, and any deviations from planned convoy procedures. WWF-Canada further requests that NIRB require Baffinland to demonstrate that convoying produces a measurable reduction in total disturbance to marine wildlife, rather than functioning as a way to move more vessels through the RSA under a lower reported transit count.	
4	Baffinland states that “it has received the necessary approvals from NIRB to construct and operate the Steensby Component and Early Revenue Phase”. This phrasing implies plans to continue operating the Early Revenue Phase out of Milne Port once Steensby is <i>operational</i>, which appears to contradict the Project Certificate. The Project Certificate states that “18 Mt/a of iron ore will be transported by Railway and shipped from Steensby Port” and that “once Steensby Port is operational, Milne Port will only be used occasionally for the delivery of oversized equipment for the Mine Site”. While amendments to the Project Certificate (No. 005) add that the ERP is to run in conjunction with the Mary River Project as originally proposed, it is WWF-Canada’s understanding that the ERP was to be temporary and capped and there are no Terms and Conditions that authorize combined or cumulative shipping volumes beyond what is provided for operations out of Steensby (242 transits per year). Conclusion/Request: WWF-Canada requests clarification from Baffinland regarding the intended role of Milne Port should the Steensby railway and port become operational. WWF-	Baffinland remains committed to the development of the Mary River Project as previously reviewed and approved by regulatory authorities and will remain compliant with all authorizations issued accordingly. Baffinland will continue to provide regular updates on its development plans through subsequent NIRB Annual Reports, environmental working groups and other established venues appropriate for communicating such information.

	Canada further requests that NIRB clarify the regulatory implications of a scenario in which iron ore is transported through both Milne Port and Steensby, including any additional review, assessment, or approvals that may be required.	
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