


Attachment 28

Environmental Protection Plan

(164 Pages)


	Environmental Protection Plan	Issue Date: May 1, 2019 <u>August 30, 2016</u> Revision: 1 <u>For review purposes only</u>	Page 1 of 2
	Environment	Document #: BAF-PH1-830-P16-0008	

Baffinland Iron Mines Corporation

DRAFT Environmental Protection Plan

Phase 2 Proposal Revisions – **FOR REVIEW PURPOSES ONLY**

This document provides revisions to:
Document #BAF-PH1-830-P16-0008
Rev 1
August 16, 2016

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 2 of 3
	Environment	Document #: BAF-PH1-830-P16-0008	

Baffinland Iron Mines Corporation

Environmental Protection Plan

BAF-PH1-830-P16-0008

Rev 1

Prepared By: Lea Willemse
Department: Environment
Title: Environmental Coordinator
Date: August 30, 2016
Signature:

Approved By: Jim Millard
Department: Environment
Title: Environmental Manager
Date: August 30, 2016
Signature:

DOCUMENT REVISION RECORD

Issue Date MM/DD/YY	Revision	Prepared By	Approved By	Issue Purpose
07/15/14	0	AV	JM	Issued for Use (Supersedes Doc. No. H349000-1000-07-126-0001 rev. 1)
08/30/16	1	LW	JM	Issued for Use

0 CONTENTS AND REVISION CONTROL


The Environmental Protection Plan (EPP) is a living document and is subject to on-going updates. The Contents and Revision Control Operational Standard presented, herein, outlines the contents of the EPP and provides a Contents List with the most recent revision date for each Operational Environment Standard (OES). The Contents List will be updated and re-issued when any OES is revised or added.

SECTION 0			
0	Contents and Revision Control		
SECTION 1			
1.1	Purpose of the Environmental Protection Plan		
1.2	Organization of the Environmental Protection Plan		
1.3	Environmental Commitments		
1.4	Environmental Approvals		
1.5	Responsibilities		
SECTION 2	OPERATIONAL ENVIRONMENTAL STANDARDS	REV #	REVISION DATE
2.1	Cultural Heritage and Archaeological Resources	H	May 10, 2016
2.2	Avoiding Disturbance to Local Land Users	F	May 10, 2016
2.3	Land Disturbance	F	May 10, 2016
2.4	Water Use	G	May 10, 2016
2.5	Geotechnical Drilling Operations	F	July 15, 2014
2.6	Equipment Operations & Mobilization	F	May 10, 2016
2.7	Fuel Storage and Handling	G	May 10, 2016
2.8	Aircraft Flights	G	May 10, 2016
2.9	Sediment and Erosion Control	F	May 10, 2016

The information contained herein is proprietary Baffinland Iron Mines Corporation and is used solely for the purpose for which it is supplied. It shall not be disclosed in whole or in part, to any other party, without the express permission in writing by Baffinland Iron Mines Corporation.

Note: This is an UNCONTROLLED COPY. All staff members are responsible to ensure the latest revision is used.

2.10	Polar Bear Encounters	F	May 10, 2016
2.11	Fox and Wolf Encounters	E	May 10, 2016
2.12	Caribou Protection Measures	F	May 10, 2016
2.13	Bird Protection Measures	G	May 10, 2016
2.14	Solid Waste Management	F	May 10, 2016
2.15	Wastewater Treatment	H	May 10, 2016
2.16	Hazardous Material and Hazardous Waste Management	F	May 10, 2016
2.17	Road Construction and Borrow Development	G	May 10, 2016
2.18	Tote Road Watercourse Crossing Installation	G	July 15, 2014
2.19	Road Traffic Management	G	May 10, 2016
2.20	Drilling, Blasting and Crushing	G	May 10, 2016
2.21	Exploration Drilling Operations	F	May 10, 2016
2.22	Water Sampling for On-Ice Drilling	D	July 15, 2014
2.23	Wildlife Log Instructions	C	May 10, 2016
2.24	Blasting in Water	C	July 15, 2014
2.25	Quarry and Barrow-Borrow Pit Operation	C	July 15, 2014
2.26	Concrete Production	C	July 15, 2014
2.27	Excavations and Foundations	C	July 15, 2014
2.28	Air Quality, Noise and Vibration	C	May 10, 2016
2.29	Post-Construction Activities	C	May 10, 2016
2.30	Protection of the Marine Environment and Wildlife	C	May 10, 2016
2.31	Freshet Management	B	May 10, 2016
2.32	Compliance Inspections	B	May 10, 2016
2.33	Spill Control Measures and Reporting	B	May 10, 2016
SECTION 3			
3.0	Documentation Logs and Forms	D	July 15, 2014
3.1	Cultural Heritage Change Find Discovery Form	B	July 15, 2014
3.2	Human Use Hunter and Visitor Access Log	B	July 15, 2014
3.3	Mary River Visitor Access Routes	A	February 12, 2015
3.4	Water Collection Log	A	July 15, 2014
3.5	Drill Inspection Forms	B	July 15, 2014
3.6	NT-NU Spill Report Form	A	July 15, 2014
3.7	Daily Tank Farm Inspection Checklist	A	July 15, 2014
3.8	Fuel Tank Dipping Form	A	July 15, 2014
3.9	Polar Bear Readiness Audit Form	A	May 10, 2016
3.10	Wildlife Log	C	July 15, 2014
3.11	Active Migratory Bird Nest Search Form	A	May 10, 2016
3.12	Off-site Waste Disposal Log	C	July 15, 2014
3.13	Wastewater Log	A	July 15, 2014
3.14	Watercourse Crossing Data Monitoring Form	A	July 15, 2014
3.15	Turbidity Monitoring Data Form	A	July 15, 2014

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 5 of 6
	Environment	Document #: BAF-PH1-830-P16-0008	

3.16	Environmental Inspection Forms	A	May 10, 2016
SECTION 4			
4.0	Request for Revision to an Operational Standard	C	July 15, 2014


	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016	Page 6 of 7
	Environment	Revision: 1 For review purposes only	Document #: BAF-PH1-830-P16-0008


TABLE OF CONTENTS

0	<i>Contents and Revision Control</i>	3
1	<i>INTRODUCTION</i>	13
1.1	Purpose	13
1.2	Organization of the Environmental Protection Plan	14
1.3	BAFFINLAND POLICIES	15
1.3.1	HEALTH, SAFETY AND ENVIRONMENT	15
1.3.2	BAFFINLAND SUSTAINABLE DEVELOPMENT POLICY	16
1.4	Environment Approvals	21
1.5	Responsibilities	23
2	<i>OPERATIONAL ENVIRONMENT STANDARDS</i>	25
2.1	Cultural Heritage and Archaeological Resources	25
2.1.1	Environmental Concern	25
2.1.2	Environmental Protection Measures	25
2.1.3	Forms	26
2.1.4	Related Documents	26
2.2	Avoiding Disturbance to Local Land Users	27
2.2.1	Environmental Concern	27
2.2.2	Environmental Protection Procedure	27
2.2.3	Forms	28
2.2.4	Related Documents	28
2.3	Land Disturbance	29
2.3.1	Environmental Concern	29
2.3.2	Environmental Protection Procedure	29
2.3.3	Forms	31
2.3.4	Related Documents	31
2.4	Water Use	32
2.4.1	Environmental Concern	32
2.4.2	Environmental Protection Measures	32
2.4.3	Forms	36
2.4.4	Related Documents	36
2.5	Geotechnical Drilling Operations	37

The information contained herein is proprietary Baffinland Iron Mines Corporation and is used solely for the purpose for which it is supplied. It shall not be disclosed in whole or in part, to any other party, without the express permission in writing by Baffinland Iron Mines Corporation.

Note: This is an UNCONTROLLED COPY. All staff members are responsible to ensure the latest revision is used.

2.5.1	Environmental Concern.....	37
2.5.2	Environmental Protection Measures	37
2.5.3	Forms.....	40
2.5.4	Related Documents	40
2.6	Equipment Operation and Mobilization.....	41
2.6.1	Environmental Concerns	41
2.6.2	Environmental Protection Measures	41
2.6.3	Forms.....	42
2.6.4	Related Documents	42
2.7	Fuel Storage and Handling.....	43
2.7.1	Environmental Concerns	43
2.7.2	Environmental Protection Measures	43
2.7.3	Forms.....	44
2.7.4	Related Documents	44
2.8	Aircraft Flights	46
2.8.1	Concerns Regarding Wildlife	46
2.8.2	Concerns Regarding Inuit Land Use	46
2.8.3	Environmental Protection Measures	46
2.8.4	Exceptions	48
2.8.5	Forms.....	48
2.8.6	Related Documents	48
2.9	Sediment and Erosion Control	49
2.9.1	Environmental Concern.....	49
2.9.2	Environmental Protection Measures	49
2.9.3	Forms.....	50
2.9.4	Related Documents	50
2.10	Polar Bear Encounters	51
2.10.1	Environmental Concern.....	51
2.10.2	Environmental Protection Measures	51
2.10.3	Forms.....	52
2.10.4	Related Documents	52
2.11	Fox and Wolf Encounters.....	53
2.11.1	Environmental Concern.....	53
2.11.2	Environmental Protection Measures	53
2.11.3	Forms.....	54

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 8 of 9
	Environment	Document #: BAF-PH1-830-P16-0008	


2.11.4	Related Documents.....	54
2.12	Caribou Protection Measures	55
2.12.1	Environmental Concern.....	55
2.12.2	Environmental Protection Measures	55
2.12.3	Forms.....	56
2.12.4	Related Documents.....	56
2.13	Bird Protection Measures.....	58
2.13.1	Environmental Concern.....	58
2.13.2	Environmental Protection Measures	58
2.13.3	Forms.....	59
2.13.4	Related Documents.....	60
2.14	Solid Waste Management	61
2.14.1	Environmental Concern.....	61
2.14.2	Incineration	61
2.14.3	Open Burning	61
2.14.4	Inert Waste Landfill	62
2.14.5	Environmental Protection Measures	62
2.14.6	Forms.....	63
2.14.7	Related Documents.....	63
2.15	Wastewater Treatment	64
2.15.1	Environmental Concern.....	64
2.15.2	Environmental Protection Measures	64
2.15.3	Forms.....	65
2.15.4	Related Documents.....	65
2.16	Hazardous Material and Hazardous Waste Management.....	66
2.16.1	Environmental Concern.....	66
2.16.2	Environmental Protection Measures	66
2.16.3	Forms.....	67
2.16.4	Related Documents.....	67
2.17	Road Construction and Borrow Development.....	68
2.17.1	Environmental Concern.....	68
2.17.2	Environmental Protection Measures	68
2.17.3	Forms.....	69
2.17.4	Related Documents.....	69
2.18	Tote Road Watercourse Crossings Installation	70

The information contained herein is proprietary Baffinland Iron Mines Corporation and is used solely for the purpose for which it is supplied. It shall not be disclosed in whole or in part, to any other party, without the express permission in writing by Baffinland Iron Mines Corporation.


Note: This is an UNCONTROLLED COPY. All staff members are responsible to ensure the latest revision is used.

2.18.1	Environmental Concerns	70
2.18.2	Environmental Protection Measures	71
2.18.3	Additional Environmental Protection Measures - Crossings Subject to "Letter of Advice" ..	72
2.18.4	Additional Environmental Protection Measures - Crossings Subject to Fisheries Authorization and Fish Habitat Compensation siteS	72
2.18.5	Forms.....	74
2.18.6	Related Documents	74
2.19	Road Traffic Management	76
2.19.1	Environmental Concern.....	76
2.19.2	Environmental Protection Measures	76
2.19.3	Forms.....	77
2.19.4	Related Documents	77
2.20	Drilling, Blasting and Crushing	78
2.20.1	Environmental Protection Measures	78
2.20.2	Forms.....	78
2.20.3	Related Documents	79
2.21	Exploration Drilling Operations	80
2.21.1	Environmental Concern.....	80
2.21.2	Environmental Protection Measures	80
2.21.3	Forms.....	84
2.21.4	Related Documents	84
2.22	Water Sampling for On Ice Drilling.....	85
2.22.1	Environmental Concerns	85
2.22.2	Environmental Protection Measures	85
2.22.3	Forms.....	86
2.22.4	Related Documents	86
2.23	Wildlife Log Instructions.....	87
2.23.1	Wildlife Log Instructions.....	87
2.23.2	Forms.....	88
2.23.3	Related Documents	88
2.24	Blasting in Water.....	89
2.24.1	Environmental Concern.....	89
2.24.2	Environmental Protection Measures	89
2.24.3	Forms.....	90
2.24.4	Related Documents	90


2.25	Quarry and Borrow Pit Management.....	91
2.25.1	Environmental Concern.....	91
2.25.2	Environmental Protection Measures	91
2.25.3	Forms.....	92
2.25.4	Related Documents	92
2.26	Concrete Production	94
2.26.1	Environmental Concern.....	94
2.26.2	Environmental Protection Measures	94
2.26.3	Forms.....	94
2.26.4	Related Documents	95
2.27	Excavations and Foundations	96
2.27.1	Environmental Concern.....	96
2.27.2	Environmental Protection Procedure	96
2.27.3	Forms.....	96
2.27.4	Related Documents	97
2.28	Air Quality, and Noise and Vibration	98
2.28.1	Environmental Concern.....	98
2.28.2	Forms.....	98
2.28.3	Related Documents	98
2.29	Post-Construction Activities	99
2.29.1	Environmental Concern.....	99
2.29.2	Forms.....	99
2.29.3	Related Documents	99
2.30	Protection of the Marine Environment and Wildlife.....	100
2.30.1	Environmental Concern.....	100
2.30.2	Forms.....	100
2.30.3	Related Documents	100
2.31	Freshet Management	101
2.31.1	Environmental Concern.....	101
2.31.2	Environmental Protection Measures	101
2.31.3	Forms.....	102
2.31.4	Related Documents	102
2.32	Compliance Inspections.....	103
2.32.1	Forms.....	104
2.32.2	Related Documents	104

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 11 of 12
	Environment	Document #: BAF-PH1-830-P16-0008	

2.33	Spill Control Measures and Reporting.....	105
2.33.1	Forms.....	107
2.33.2	Related Documents	107
2.34	Railway Traffic Management.....	109
2.34.1	Related Documents	109
2.35	Ore Dock Construction	110
2.35.1	Environmental Concern.....	110
2.35.2	Environmental Protection Measures	110
2.35.3	Forms.....	112
2.35.4	Related Documents	112
3	DOCUMENTATION LOGS AND FORMS.....	113
3.1	Cultural Heritage and Chance Find Discovery Form	114
3.2	Hunter and Visitor access Log	115
3.3	Visitor Access Routes	117
3.4	Water Collection Log.....	123
3.5	Drill Inspection Forms	124
3.6	NT-NU Spill Report Form	128
3.7	Daily Tank Inspection Checklist.....	129
3.8	Fuel Tank Dipping Form.....	130
3.9	Polar Bear Readiness Audit Form.....	131
3.10	Wildlife Log.....	132
3.11	Active Migratory Bird Nest Search Form	133
3.12	Off-site Waste Disposal Log.....	135
3.13	Wastewater Log.....	136
3.14	Watercourse Crossing Data Monitoring Form	137
3.15	Turbidity Monitoring Data Form.....	138
3.16	Environmental Inspection Forms	139
4	REQUEST FOR REVISION TO AN OPERATIONAL ENVIRONMENT STANDARD	156

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 12 of 13
	Environment	Document #: BAF-PH1-830-P16-0008	

<i>Appendix A Polar Bear Readiness Procedure and Audit</i>	<i>157</i>
<i>Appendix B Caribou Encounters Decision Tree</i>	<i>161</i>
<i>Appendix C Mary River Active Migration Bird Surveys Protocol</i>	<i>163</i>

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 13 of 14
	Environment	Document #: BAF-PH1-830-P16-0008	

1 INTRODUCTION


1.1 PURPOSE

The purpose of the Environment Protection Plan is to ensure that a high level of importance is placed on the protection of the environment by Project Personnel throughout the lifecycle of Baffinland Iron Mines Corporation's (Baffinland's) Mary River Project (Project). This document provides Operational Environmental Standards (OESs) to identify and address Project environmental issues and concerns and to provide guidance and control measures (which may be field fit as required), to avoid potential negative impacts to the environment and/or minimize or mitigate these impacts to the greatest extent practicable. The OESs are not comprehensive and are intended to be used in conjunction with relevant documents such as Environmental Management Plans (EMPs), Standard Operating Procedures, Environmental Permits, Licences, and Regulation, etc. The EPP will be updated as required to reflect current management reviews, incident investigations, regulatory changes, or other Project-related process modifications. The EPP is an integral part of the Project's Environmental Management System implemented for the Project to allow for the integration of environmental issues and regulations into the design/engineering and operation of the Project through the implementation and evolution of the OESs presented in this document.

The EPP provides a practical way to facilitate field implementation of environmental regulations, practices, and measures required to eliminate or reduce potential adverse environmental effects. It is a working document for use by Project Personnel, as well as at the Baffinland corporate level for ensuring commitments made in policy statements are implemented and monitored. The EPP provides a quick reference for Project Personnel to monitor for compliance and to make suggestions for improvements. This EPP provides the general protection measures for routine and unplanned activities associated with the Project. The EPP is developed in recognition of applicable permits, authorizations, approvals and Inuit Knowledge. As well, the plan provides operational measures that comply with aforementioned permits, approvals, etc., and provides reference to other associated and relevant documents such as Environmental Management Plans and Standard Operating Procedures.

The specific purposes of the EPP are as follows:

- Provide a reference document to ensure that commitments to minimize adverse environmental effects will be met.
- Document and identify environmental concerns and ensure appropriate protection measures are implemented.
- Provide concise guidance to Project Personnel regarding the implementation of appropriate standards for protecting the environment and minimizing adverse environmental effects.


	Environmental Protection Plan	Issue Date: May 1, 2019 <u>August 30, 2016</u> Revision: 1 <u>For review purposes only</u>	Page 14 of 15
	Environment	Document #: BAF-PH1-830-P16-0008	

- Provide a reference and training document for Project Personnel when planning and/or conducting specific activities and working in specific areas.
- Communicate changes in the program through the revision process.
- Provide a reference to related applicable documents such as legislative requirements, guidelines, permits, Environmental Management Plans, Standard Operating Procedures, etc.

The EPP provides documentation of environmental protection measures against which the environmental performance of Project Personnel can be readily measured and corrective actions developed and implemented where required. Project Personnel are expected to understand and implement the environmental protection measures provided within the EPP. If, at any time, Project Personnel do not understand or are unclear regarding how or when to implement an environmental protection measure the Environment Department must be contacted to obtain clarification.

1.2 ORGANIZATION OF THE ENVIRONMENTAL PROTECTION PLAN

The EPP provides directions to ensure Project Personnel understand and implement environmental protection standards for both routine activities and unplanned events associated with Project activities. The format of the EPP is intended to enable its practical use by Project Personnel, especially supervisors, in the workplace. Its function is a support document to impart an understanding by Project Personnel of Baffinland's approach to environmental protection planning and the specific requirements in various permits, approvals, authorizations, Environmental Management Plans, etc., issued for specific project components and activities.

	Environmental Protection Plan	Issue Date: <u>May 1, 2019</u> August 30, 2016 Revision: <u>1</u> For review purposes only	Page 15 of 16
	Environment	Document #: BAF-PH1-830-P16-0008	

1.3 BAFFINLAND POLICIES

1.3.1 HEALTH, SAFETY AND ENVIRONMENT

This Baffinland Iron Mines Corporation Policy on Health, Safety and Environment is a statement of our commitment to achieving a safe, healthy and environmentally responsible workplace. We will not compromise this policy for the achievement of any other organizational goals.

We implement this Policy through the following commitments:

- Continual improvement of safety, occupational health and environmental performance
- Meeting or exceeding the requirements of regulations and company policies
- Integrating sustainable development principles into our decision-making processes
- Maintaining an effective Health, Safety and Environmental Management System
- Sharing and adopting improved technologies and best practices to prevent injuries, occupational illnesses and environmental impacts
- Engaging stakeholders through open and transparent communication.
- Efficiently using resources, and practicing responsible minimization, reuse, recycling and disposal of waste.
- Reclamation of lands to a condition acceptable to stakeholders.

Our commitment to provide the leadership and action necessary to accomplish this policy is exemplified by the following principles:


- As evidenced by our motto "Safety First, Always" and our actions Health and Safety of personnel and protection of the environment are values not priorities.
- All injuries, occupational illnesses and environmental impacts can be prevented.
- Employee involvement and active contribution through courageous leadership is essential for preventing injuries, occupational illnesses and environmental impacts.
- Working in a manner that is healthy, safe and environmentally sound is a condition of employment.
- All operating exposures can be safeguarded.
- Training employees to work in a manner that is healthy, safe and environmentally sound is essential.
- Prevention of personal injuries, occupational illnesses and environmental impacts is good business.
- Respect for the communities in which we operate is the basis for productive relationships.

We have a responsibility to provide a safe workplace and utilize systems of work to meet this goal. All employees must be clear in understanding the personal responsibilities and accountabilities in relation to the tasks we undertake.

The health and safety of all people working at our operation and responsible management of the environment are core values to Baffinland. In ensuring our overall profitability and business success every Baffinland and business partner employee working at our work sites is required to adhere to this Policy.



Brian Penney
Chief Executive Officer
April 2018

	Environmental Protection Plan	Issue Date: <u>May 1, 2019</u> <u>August 30, 2016</u> Revision: <u>1</u> <u>For review purposes only</u>	Page 16 of 17
	Environment	Document #: BAF-PH1-830-P16-0008	

1.3.2 BAFFINLAND SUSTAINABLE DEVELOPMENT POLICY

At Baffinland Iron Mines Corporation (Baffinland), we are committed to conducting all aspects of our business in accordance with the principles of sustainable development & corporate responsibility and always with the needs of future generations in mind. Baffinland conducts its business in accordance with the Universal Declaration of Human Rights and ArcelorMittal's Human Rights Policy which applies to all employees and affiliates globally.

Everything we do is underpinned by our responsibility to protect the environment, to operate safely and fiscally responsibly and with utmost respect for the cultural values and legal rights of Inuit. We expect each and every employee, contractor, and visitor to demonstrate courageous leadership in personally committing to this policy through their actions. The Sustainable Development and Human Rights Policy is communicated to the public, all employees and contractors and it will be reviewed and revised as necessary on a regular basis. These four pillars form the foundation of our corporate responsibility strategy:

1. Health and Safety
2. Environment
3. Upholding Human Rights of Stakeholders
4. Transparent Governance

1.0 HEALTH AND SAFETY


- We strive to achieve the safest workplace for our employees and contractors; free from occupational injury and illness, where everyone goes home safe everyday of their working life. Why? Because our people are our greatest asset. Nothing is as important as their health and safety. Our motto is "Safety First, Always".
- We report, manage and learn from injuries, illnesses and high potential incidents to foster a workplace culture focused on safety and the prevention of incidents.
- We foster and maintain a positive culture of shared responsibility based on participation, behaviour, awareness and promoting active courageous leadership. We allow our employees and contractors the right to stop any work if and when they see something that is not safe.

2.0 ENVIRONMENT

- Baffinland employs a balance of the best scientific and traditional Inuit knowledge to safeguard the environment.
- Baffinland applies the principles of pollution prevention, waste reduction and continuous improvement to minimize ecosystem impacts, and facilitate biodiversity conservation.
- We continuously seek to use energy, raw materials and natural resources more efficiently and effectively. We strive to develop more sustainable practices.
- Baffinland ensures that an effective closure strategy is in place at all stages of project development to ensure reclamation objectives are met.

3.0 UPHOLDING HUMAN RIGHTS OF STAKEHOLDERS

- We respect human rights, the dignity of others and the diversity in our workforce. Baffinland honours and respects the unique cultural values and traditions of Inuit.
- Baffinland does not tolerate discrimination against individuals on the basis of race, colour, gender, religion, political opinion, nationality or social origin, or harassment of individuals freely employed.
- Baffinland contributes to the social, cultural and economic development of sustainable communities in the North Baffin Region.

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 17 of 18
	Environment	Document #: BAF-PH1-830-P16-0008	

- [We honour our commitments by being sensitive to local needs and priorities through engagement with local communities, governments, employees and the public. We work in active partnership to create a shared understanding of relevant social, economic and environmental issues, and take their views into consideration when making decisions.](#)
- [We expect our employees and contractors, as well as community members, to bring human rights concerns to our attention through our external grievance mechanism and internal human resources channels. Baffinland is committed to engaging with our communities of interest on our human rights impacts and to reporting on our performance.](#)

[4.0 TRANSPARENT GOVERNANCE](#)

- [Baffinland will take steps to understand, evaluate and manage risks on a continuing basis, including those that may impact the environment, employees, contractors, local communities, customers and shareholders.](#)
- [Baffinland endeavours to ensure that adequate resources are available and that systems are in place to implement risk-based management systems, including defined standards and objectives for continuous improvement.](#)
- [We measure and review performance with respect to our safety, health, environmental, socio-economic commitments and set annual targets and objectives.](#)
- [Baffinland conducts all activities in compliance with the highest applicable legal & regulatory requirements and internal standards.](#)
- [We strive to employ our shareholder's capital effectively and efficiently and demonstrate honesty and integrity by applying the highest standards of ethical conduct.](#)

[4.1 FURTHER INFORMATION](#)

[Please refer to the following policies and documents for more information on Baffinland's commitment to operating in an environmentally and socially responsible manner:](#)

[Health, Safety and Environment Policy](#)

[Workplace Conduct Policy](#)

[Inuktitut in the Workplace Policy](#)

[Site Access Policy](#)

[Hunting and Fishing \(Harvesting\) Policy](#)

[Annual Report to Nunavut Impact Review Board](#)

[If you have questions about Baffinland's commitment to upholding human rights, please direct them to \[contact@baffinland.com\]\(mailto:contact@baffinland.com\).](#)



[Brian Penney](#)

[Chief Executive Officer](#)


[March 2016](#)



[Sustainable Development and Human Rights Policy](#)

The information contained herein is proprietary Baffinland Iron Mines Corporation and is used solely for the purpose for which it is supplied. It shall not be disclosed in whole or in part, to any other party, without the express permission in writing by Baffinland Iron Mines Corporation.

Note: This is an UNCONTROLLED COPY. All staff members are responsible to ensure the latest revision is used.

	Environmental Protection Plan	Issue Date: <u>May 1, 2019</u> <u>August 30, 2016</u> Revision: <u>1</u> <u>For review purposes only</u>	Page 18 of 19
	Environment	Document #: BAF-PH1-830-P16-0008	

~~At Baffinland Iron Mines Corporation (Baffinland), we are committed to conducting all aspects of our business in accordance with the principles of sustainable development & corporate responsibility and always with the needs of future generations in mind. Baffinland conducts its business in accordance with the Universal Declaration of Human Rights and ArcelorMittal's Human Rights Policy which applies to all employees and affiliates globally.~~

~~Everything we do is underpinned by our responsibility to protect the environment, to operate safely and fiscally responsibly and with utmost respect for the cultural values and legal rights of Inuit. We expect each and every employee, contractor, and visitor to demonstrate courageous leadership in personally committing to this policy through their actions. The Sustainable Development and Human Rights Policy is communicated to the public, all employees and contractors and it will be reviewed and revised as necessary on a regular basis. These four pillars form the foundation of our corporate responsibility strategy are:~~

- ~~1. Health and Safety~~
- ~~2. Environment~~
- ~~3. Upholding Human Rights of Stakeholders~~
- ~~4. Transparent Governance~~

~~1.0 HEALTH AND SAFETY~~

- ~~• We strive to achieve the safest workplace for our employees and contractors; free from occupational injury and illness, where everyone goes home safe everyday of their working life. Why? Because our people are our greatest asset. Nothing is as important as their health and safety. Our motto is "Safety First, Always".~~
- ~~• We report, manage and learn from injuries, illnesses and high potential incidents to foster a workplace culture focused on safety and the prevention of incidents.~~
- ~~• We foster and maintain a positive culture of shared responsibility based on participation, behaviour, awareness and promoting active courageous leadership. We allow our employees and contractors the right to stop any work if and when they see something that is not safe.~~

~~2.0 ENVIRONMENT~~

- ~~• Baffinland employs a balance of the best scientific and traditional Inuit knowledge to safeguard the environment.~~
- ~~• Baffinland applies the principles of pollution prevention, waste reduction and continuous improvement to minimize ecosystem impacts, and facilitate biodiversity conservation.~~


- ~~We continuously seek to use energy, raw materials and natural resources more efficiently and effectively. We strive to develop more sustainable practices.~~
- ~~Baffinland ensures that an effective closure strategy is in place at all stages of project development to ensure reclamation objectives are met.~~

~~3.0 UPHOLDING HUMAN RIGHTS OF STAKEHOLDERS~~

- ~~We respect human rights, the dignity of others and the diversity in our workforce. Baffinland honours and respects the unique cultural values and traditions of Inuit.~~
- ~~Baffinland does not tolerate discrimination against individuals on the basis of race, colour, gender, religion, political opinion, nationality or social origin, or harassment of individuals freely employed.~~
- ~~Baffinland contributes to the social, cultural and economic development of sustainable communities in the North Baffin Region.~~
- ~~We honour our commitments by being sensitive to local needs and priorities through engagement with local communities, governments, employees and the public. We work in active partnership to create a shared understanding of relevant social, economic and environmental issues, and take their views into consideration when making decisions.~~
- ~~We expect our employees and contractors, as well as community members, to bring human rights concerns to our attention through our external grievance mechanism and internal human resources channels. Baffinland is committed to engaging with our communities of interest on our human rights impacts and to reporting on our performance.~~


~~4.0 TRANSPARENT GOVERNANCE~~

- ~~Baffinland will take steps to understand, evaluate and manage risks on a continuing basis, including those that may impact the environment, employees, contractors, local communities, customers and shareholders.~~
- ~~Baffinland endeavours to ensure that adequate resources are available and that systems are in place to implement risk-based management systems, including defined standards and objectives for continuous improvement.~~
- ~~We measure and review performance with respect to our safety, health, environmental, socio-economic commitments and set annual targets and objectives.~~
- ~~Baffinland conducts all activities in compliance with the highest applicable legal & regulatory requirements and internal standards.~~

	Environmental Protection Plan	Issue Date: <u>May 1, 2019</u> August 30, 2016 Revision: <u>1</u> For review purposes only	Page 20 of 21
	Environment	Document #: BAF-PH1-830-P16-0008	

- ~~• We strive to employ our shareholder's capital effectively and efficiently and demonstrate honesty and integrity by applying the highest standards of ethical conduct.~~

~~Brian Penney~~
~~Chief Executive Officer~~
~~March~~ ~~February~~ 2016

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 21 of 22
	Environment	Document #: BAF-PH1-830-P16-0008	

1.31.4 ENVIRONMENT APPROVALS


Table 1-1 provides a list of Baffinland's issued Environmental Approvals.

TABLE 1-1: ENVIRONMENTAL APPROVALS ISSUED TO BAFFINLAND

Permit ID	Licence Name	Status Update for 2015	Expiry
Nunavut Impact Review Board			
No. 005 (Amendment No. 1)	Amended Project Certificate	All works and activities proposed have been screened by the NIRB and have been considered in the amended Project Certificate issued by the NIRB in May 2014. A NIRB Annual Report is submitted by March 31 of each year summarizes the status of the Project relative to the conditions outlined in the Project Certificate.	N/A
No. 005 (Amendment No. 2)	Amended Project Certificate	Amendment No. 2 was issued October 30, 2018 to reflect modifications to the Project associated with the Production Increase Proposal	December 31, 2019
Nunavut Water Board Licences			
2AM-MRY1325 Amendment No. 1	Type A Water Licence	An application to amend the Type A Water Licence to account for activities approved for the Early Revenue Phase was submitted to the NWB on July 16, 2014. Final hearings took place in April, 2015 and was approved on July 31, 2015.	June 30, 2025
2BE-MRY1421	Type B Water Licence	In good standing; no amendments from previous year.	April 16, 2021
8BC-MRY1416	Type B Water Licence	The activities therein are now covered by the amended Type A. As such, the licence was cancelled by the NWB on February 25, 2016.	Cancelled
<ul style="list-style-type: none"> Crown Land Use Permits and Quarry Permits 			
47H/16-1-2	Foreshore Area for Milne Port Ore Dock Lease	In good standing; no changes from previous year. Will be renewed.	June 30, 2035
N2014Q0016	Tote Road and Borrow Area Land Use Permit	In good standing; no changes from previous year. Will be renewed.	June 30, 2019 6
N2014C0013	Steensby Camp Land Use Permit	In good standing, no changes from previous year. Will be renewed.	June 30, 2019 6
N2014J0011	Bruce Head Land Use Permit	In good standing, no changes from previous year. Will be renewed.	June 30, 2019 6
N2014X0012	Milne Foreshore Land Use Permit	In good standing, no changes from previous year.	June 30 2019
#2483, #2484, #2485	Mineral Leases	In good standing. Lease #2484 covers Deposit No. 1.	August 27, 2034

The information contained herein is proprietary Baffinland Iron Mines Corporation and is used solely for the purpose for which it is supplied. It shall not be disclosed in whole or in part, to any other party, without the express permission in writing by Baffinland Iron Mines Corporation.


Note: This is an UNCONTROLLED COPY. All staff members are responsible to ensure the latest revision is used.

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 22 of 23
	Environment	Document #: BAF-PH1-830-P16-0008	

Permit ID	Licence Name	Status Update for 2015	Expiry
Authorizations under the Fisheries Act			
06-HCAA-CA7-0084	Crossings along the Milne Inlet Tote Road Authorization	The authorization remains valid and has been amended over the years. Monitoring and reporting to DFO occurs annually. Baffinland made a request to have the following sea can crossing, STA 17 (CV 128), STA 62 (BG50) and STA 80 (CV 217) remain in place until no later than December 31, 2016. This request was approved by DFO on September 30, 2015.	December 31, 2016 N/A
NU-07-0050	Upgrades to Tote Road Crossings Letter of Advice	The construction summary report was provided in the 2014 Annual Report to NIRB.	N/A
14-HCAA-00525	Authorization – Milne Ore Dock	A monitoring report for the construction of the ore dock was submitted to DFO on January 4, 2016.	December 31, 2020
NU-06-0084	Fisheries Authorization – Tote Road		N/A
18-HCAA-00160	Fisheries Authorization Freight Dock	Issued March 21, 2019 to allow for construction of the freight dock at Milne Port	June 1, 2020
Approvals under the Navigable Waters Protection Act			
8200-07-10273, 8200-07-10267, 8200-07-10269, 8200-07-10268, 8200-07-10274, 8200-07-10272, 8200-07-10266, 8200-07-10271 BG50, CV128, CV217, and CV223	Construction of Watercourse Crossings (Bridges and Culverts)	In good standing, no changes from previous year. Apply to crossings CV040, BG50, CV128, CV223, CV072, BG17, CV217, and CV099.	Until complete
4306-2-6-P/B	Occasional-Use Marine Facility	The Milne Inlet Marine Facility Security Plan was approved by Transport Canada on June 5, 2015.	June 30, 2018
001743	Statement of Compliance of a Marine Facility	Approval for the Milne Inlet Marine Facility to conduct ore operations. In good standing.	June 24, 2020
Approvals under Nunavut Mine Health and Safety Act			
-	-	In good standing, no changes from previous year.	-
Licence under the Explosives Act			
F1-076068/EF76068	Division 1 Factory L Licence	Held by explosives contractor for the Project.	- May 31, 2019

The information contained herein is proprietary Baffinland Iron Mines Corporation and is used solely for the purpose for which it is supplied. It shall not be disclosed in whole or in part, to any other party, without the express permission in writing by Baffinland Iron Mines Corporation.

Note: This is an UNCONTROLLED COPY. All staff members are responsible to ensure the latest revision is used.

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016	Page 23 of 24
	Environment	Revision: 1 For review purposes only	Document #: BAF-PH1-830-P16-0008

Permit ID	Licence Name	Status Update for 2015	Expiry
Leases under the Nunavut Land Claims Agreement			
Q13C301	Inuit Owned Land Commercial Lease	Compliance with the lease is outlined in the 2015 <i>Annual Report to QIA and NWB.</i>	December 31, 2043

The terms and conditions of these approvals have been incorporated into the OESs provided in this document. Project Personnel are directed to the applicable approvals. Should discrepancies exist between the OES and approvals provided in Table 1-1, the approvals govern. Official copies of the approvals are maintained on site by the Baffinland Document Controller.

1.41.5 RESPONSIBILITIES

Vice-President, ~~Corporate Sustainability of Sustainable Development~~

- Provide corporate resources and overall direction to the implementation of the EPP.

Health, Safety, Environment and Security Director

- Provide corporate resources and overall direction to the implementation of the EPP.
- Provide review and approval of revised versions of EPP.

Health, Safety, Environment and Security ~~Environmental~~ Manager

- Provide technical guidance and final review and approval of revised versions of EPP.
- Ensure EPP is properly communicated to departmental Site Managers and ensure adequate training is in place for all site Supervisors.

Environmental Superintendents and Coordinators


- Conduct a review and revision of the EPP on an as needed basis to determine if updates are required, or at the request of the Environmental Manager.
- Review revisions to the EPP.
- Ensure revisions are distributed to managers and supervisors.
- Perform document controls.
- Ensure that managers, supervisors and their staff are familiar with the EPP and its protection measures.
- Obtain approvals from management.

Site Managers (including Contractors)

- Implement the EPP in daily operations.
- Maintain a current copy of each relevant OES and the Contents and Revision Control List (Section 0).
- Provide training and support to ensure successful implementation of the EPP.
- Initiate changes to improve and update the plan as needed.

Site Personnel


- Familiarization with the relevant sections of the EPP.

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 24 of 25
	Environment	Document #: BAF-PH1-830-P16-0008	

- Have knowledge of reporting procedures.

Environmental Consultants

- Provide technical support to EPP development and ongoing revisions.
- Provide audits of EPP implementation, as requested by the VP Sustainable Development.

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 25 of 26
	Environment	Document #: BAF-PH1-830-P16-0008	

2 OPERATIONAL ENVIRONMENT STANDARDS

2.1 CULTURAL HERITAGE AND ARCHAEOLOGICAL RESOURCES

SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION #	REVISION DATE
2.1	Cultural Heritage and Archaeological Resources	H	May 10, 2016

A number of cultural heritage and archaeological sites have been identified across the Project Area. The Environment Department will provide information regarding the location of these sites relative to potential work areas. The potential exists to encounter undiscovered cultural heritage or archaeological resources (Chance Finds) when conducting construction activities such as excavating and site clearing.

2.1.1 ENVIRONMENTAL CONCERN


The Mary River Project area has been occupied by humans for over 4,000 years. Archaeological sites are very common throughout the region, mostly consisting of stone structures that usually represent tent rings and shelters, caches, traps, hunting blinds, cairns and *inukshuks*. Stone tool making sites are also present. These types of archaeological sites and features are often difficult to recognize. All archaeological sites are valuable, non-renewable sources of information about local people's history and provide crucial data for scientists studying Northern ways of life throughout the past. It is against territorial law to disturb known or suspected archaeological sites, punishable by fine or imprisonment. Many areas of the Project have not been surveyed by a qualified archaeologist; therefore Project Personnel must obtain approval from the Environment Department before traveling off of existing roads or disturbing ground surfaces.

Milne Port, the Tote Road, and Mary River sites have been identified as having high overall archaeological potential. While surveys have been completed throughout project areas, they are ongoing. The locations of identified archeological finds have been provided to Baffinland.

2.1.2 ENVIRONMENTAL PROTECTION MEASURES

The following measures will be implemented to minimize the potential for impacting an archaeological site:

- Project Personnel shall not deviate from already disturbed areas or established routes (existing roads and camp areas).
- Cultural resources discovered during project activities (Chance Finds) shall be reported to the Environment Department who will develop a course of action in consultation with the Project Archaeologist
- Upon a discovery, a Cultural Heritage Chance Find Discovery Report (Section 3.1) must be completed and submitted to the Environment Department.

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 26 of 27
	Environment	Document #: BAF-PH1-830-P16-0008	


- Human remains and funerary objects shall be treated with dignity and respect at all times, regardless of ethnic origins, cultural backgrounds or religious affiliations.
- Artifacts shall be left where they are found. If artifacts are disturbed or removed, their location shall be reported to the Environment Department
- Archaeological site locations shall be kept confidential to prevent unauthorized collection or disturbance of artifacts.
- Known sites near Project activities will be marked by stakes, flagging and/or yellow rope at approximately 30 metres away from each site.
- All Project Personnel shall avoid and remain more than 30 m away from all known or suspected archaeological sites, staying well away from any temporary protection measures such as flagging, stakes and/or yellow rope fencing.
- Existing inukshuks shall not be modified or disturbed. New inukshuks or rock piles shall not be constructed since building new rock piles may clutter the archaeological record and/or result in unknowingly using rocks from existing archaeology sites.
- Known archaeological sites shall be avoided by re-routing roads and establishing borrow excavations at locations approved for use by the Project Archaeologist. Sites that can't be avoided will be mitigated by the archaeology team prior to construction activities.
- If suspected archaeological or human remains (structures, artifacts or bones) are unearthed during work operations, stop work immediately and notify the Environment Department. The Environment Department will in turn contact the Project Archaeologist and the appropriate lands inspector and the Government of Nunavut, as required by law. The Project Archaeologist shall complete an archaeological review of all proposed Project Areas as they are finalized to identify areas with possible conflicts and areas where Project activities may proceed.

2.1.3 FORMS

- Baffinland EPP - Cultural Heritage Chance Find Discovery Report (Section 3.1)

2.1.4 RELATED DOCUMENTS

- Baffinland – Cultural Heritage Resource Protection Plan (BAP-PH1-830-P16-0006)

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 27 of 28
	Environment	Document #: BAF-PH1-830-P16-0008	

2.2 AVOIDING DISTURBANCE TO LOCAL LAND USERS

SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION #	REVISION DATE
2.2	Avoiding Disturbance to Local Land Users	F	May 10, 2016


2.2.1 ENVIRONMENTAL CONCERN

Land and resource use in the Project Area includes hunting, fishing, trapping and tourism. Potential impacts to existing land use will include the interruption of camping, hunting, tourism and marine activities in and around Milne Port, the Tote Road, [the North Railway](#), and Mary River. During open water, it is common for Pond Inlet residents to travel by boat to Milne Port. During fall, winter and spring, hunters travel to Project Areas to hunt seals on the sea ice and caribou inland. Baffinland is committed to minimize disturbance to land users to the extent possible.

2.2.2 ENVIRONMENTAL PROTECTION PROCEDURE

Measures will be implemented to minimize disturbance to existing land use patterns for the duration of the Project. These measures include:

- Advanced notification of shipping schedules to the community of Pond Inlet and to Nunavut Tourism. This will allow other land users (e.g. hunters, tourist operators) to re-schedule or modify travel plans, if preferred.
- Limit activities at Milne Port to the western portion of the beach near camp and do not operate equipment along the eastern half of the beach or off existing roads.
- Aircraft will fly in accordance with guidelines outlined in the Aircraft Flights Operational Environment Standard (Section 2.8).
- [Road traffic will operate in accordance with guidelines outlined in the Road Traffic Management Operational Environment Standard \(Section 2.19\).](#)
- [Railway construction will be carried out in accordance with the guidelines outlined in Section 2.34 of the EPP, in accordance with the Hunter and Visitor Site Access Procedure \(BAF-PH1-830-PRO-0002\).](#)
- [Railway traffic will operate in accordance with guidelines outlined in the Railway Operation and Maintenance Plan, in accordance with the Hunter and Visitor Site Access Procedure \(BAF-PH1-830-PRO-0002\), \(see Section 2.35 of this EPP\).](#)
- Pilots and others will record the presence of other land users in the Human Use Log (Section 3.2) posted at each site, and will notify the Environment Department of any sightings.
- [Land users are encouraged to record their presence using the Human Use Log \(Section 3.2\) posted at each Project Site.](#)

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 28 of 29
	Environment	Document #: BAF-PH1-830-P16-0008	


- [Early warning signs will warn road users of an approaching railway crossing and stop sign ahead.](#)
- [A combined stop and railway crossing sign will be located on either side of the crossings.](#)
- [Crossing timbers will ease vehicle, ATV, and snowmobile crossing at assigned crossing locations.](#)
- [Instructional bulletins regarding the rail crossings will be posted in English and Inuktitut at Project facilities.](#)
- Any disruptions to land use will be documented so that this information can be considered in subsequent phases of project development.
- Baffinland has developed a Hunter and Visitor Site Access Procedure (BAF-PH1-830-PRO-0002), which provides safe access routes to and instructions upon arrival for Hunters and Visitors visiting Project sites.

2.2.3 FORMS

- Baffinland EPP - ~~Human Use~~ [Hunter and Visitor Access](#) Log (Section 3.2)
- Baffinland EPP – Visitor Access Routes – Mary River and Milne Port (Section 3.3)

2.2.4 RELATED DOCUMENTS

- Baffinland EPP - Aircraft Flights (Section 2.8)
- Baffinland EPP – Road Traffic Management (Section 2.19)
- Baffinland Hunter and Visitor Site Access Procedure (BAF-PH1-830-PRO-0002)

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 29 of 30
	Environment	Document #: BAF-PH1-830-P16-0008	

2.3 LAND DISTURBANCE

SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION #	REVISION DATE
2.3	Ground Disturbance	F	May 10, 2016

Ongoing development of Project areas require ground disturbances, including camp and road construction, quarrying and mobile vehicle operation.

2.3.1 ENVIRONMENTAL CONCERN

The Arctic is a fragile environment where the recovery of vegetation within this region is slow. Ground disturbance shall be minimized to protect archaeological resources, wildlife habitats, sensitive landforms, such as ice-rich permafrost features, and prevent erosion and the movement of sediment into watercourses and water bodies. Conditions provided in Baffinland's permits, licences and authorizations address ground disturbances and outline the necessary protection measures that are required to minimize impact to the environment.


Thaw settlements and surface sloughing of cut slopes may occur in Project areas, particularly during the thaw seasons immediately following construction. The behaviour of both cut slopes and embankment fills will be monitored throughout these thaw seasons and remedial measures will be implemented as necessary. For example, it is expected that many of the cut slopes will need to be monitored as thaw settlements occur.

Silt fences and other erosion protection measures as described below, will be installed as necessary to prevent siltation of adjacent drainage courses and water bodies.


2.3.2 ENVIRONMENTAL PROTECTION PROCEDURE

The following measures shall be implemented to minimize potential ground disturbances:

- Project Personnel and equipment shall remain on only existing roads and trails.
- Modifications to any design/engineering drawings must be approved by the Environment Department before any Work on the modification may be started.
- Rutting (furrow creation) shall be minimized on ground surfaces when possible.
- All camps and equipment storage areas shall be located on gravel, sand and/or other durable land.
- No materials shall be stored on the surface ice of streams.
- No material shall be removed from below the ordinary High Water Mark of any stream or water body.
- Greywater sumps must be located at distance of at least 31 metres above the ordinary High Water Mark of any water body.

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 30 of 31
	Environment	Document #: BAF-PH1-830-P16-0008	

- Equipment and supplies brought to Project sites shall be clean and free of soils that could contain plant seeds not naturally occurring in the area. Vehicle tires and treads in particular must be inspected prior to initial use in Project Areas.
- Prior to construction activities, a site drainage drawing must be submitted to the Environment Department for approval.
- [Runoff collection and diversion drainage systems will be used to control runoff and erosion from affecting the modified thermal regime.](#)
- The limits for all clearing, grubbing and topsoil overburden removal shall be identified on the “Issued for Construction” drawings and staked in the field prior to the commencement of any Work.
- Areas to be cleared shall have sediment and erosion control measures implemented prior to the initiation of any clearing activities. The sediment and erosion control measures shall be adapted to suit the field conditions associated with the specific construction activities as construction proceeds.
- [Slopes will be flattened as necessary when being constructed in ice-rich or thaw sensitive materials, and will be protected with thermal and erosion protection material, if required.](#)
- [Excavations will be minimized, especially in areas of known ice-rich permafrost.](#)
- [Prior to embankment construction, ground disturbance will be minimized and vegetative or organic cover left in place to provide the maximum protection of the thermal regime. In areas where excavation is required, the foundations will be over excavated and backfilled with 0.8 m of non-freeze/thaw susceptible fill to minimize frost heaving and settlement. Slopes will be flattened as necessary when being constructed in ice-rich or thaw sensitive materials, and will be protected with erosion protection material, if required. This will include a geotextile layer as well as an engineered backfill.](#)
- [For high embankment fills on ice-rich materials, the side slopes may be flattened significantly or stabilization berms constructed to reduce the creep deformation potential.](#)
- [For construction during the summer, woven geotextile may be required over unstable ground.](#)
- [Proper runoff collection and diversions drainage systems will be used to control runoff and erosion from affecting the modified thermal regime.](#)
- [As part of basic design, thermal modeling will be conducted for each typical embankment condition and configuration to identify the actual permafrost protection measures required and to predict the nature of the active layer and the effect that construction will have on the thermal regime over the life of the Project. The thermal modeling will incorporate potential warming trends resulting from climate change based on world-recognized global warming scenarios.](#)

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 31 of 32
	Environment	Document #: BAF-PH1-830-P16-0008	


- [Thaw settlements and surface sloughing of cut slopes is expected, particularly during the thaw seasons immediately following construction. The behaviour of both cut slopes and embankment fills will be monitored throughout these thaw seasons and remedial measures will be implemented as necessary. For example, it is expected that many of the cut slopes will need to be monitored as thaw settlements occur.](#)
- [Silt fences and other erosion protection measures will be installed as necessary to prevent siltation of adjacent drainage courses and water bodies.](#)
- [In areas where excavation is required, the foundations will be over excavated and backfilled with 1.5 m of non-freeze/thaw susceptible fill to reduce frost heaving and settlement. For high embankment fills on ice-rich materials, the side slopes may be flattened substantially or stabilization berms constructed to reduce the creep deformation potential.](#)
- [To reduce the rate of creep settlement, embankments thicker than three metres should be constructed with side slopes no steeper than 5H:1V or with toe buttresses. For construction during the summer, woven geotextile may be required over unstable ground.](#)
- No debris or any other construction material shall be allowed to enter any water body.
- New equipment entering the site will be examined for invasive species.
- A Baffinland Incident Investigation Form (BAF-PH1-810-FOR-0005) will be completed for all non-approved land disturbances.

2.3.3 FORMS

- Baffinland - Incident Investigation Form (BAF-PH1-810-FOR-0005)

2.3.4 RELATED DOCUMENTS

- Baffinland EPP – Cultural Heritage and Archaeological Resources (Section 2.1)
- Baffinland EPP – Sediment and Erosion Control (Section 2.9)
- Baffinland EPP – Road Construction and Borrow Development (Section 2.17)
- Baffinland EPP – Quarry and Borrow Pit Management (Section 2.25)
- [Baffinland EPP – Excavation and Foundations \(Section 2.27\)](#)
- [Baffinland EPP – Railway Construction \(Section 2.34\)](#)
- Baffinland – Roads Management Plan (BAF-PH1-830-P16-0023)
- Baffinland – Borrow Pit and Quarry Management Plan (BAF-PH1-830-P16-0004)

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 32 of 33
	Environment	Document #: BAF-PH1-830-P16-0008	

2.4 WATER USE

SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION #	REVISION DATE
2.4	Water Use	G	May 10, 2016

2.4.1 ENVIRONMENTAL CONCERN

Water is an important resource that must be protected. The use of water by Baffinland for the Project is currently governed by the Type A Water Licence (2AM-MRY1325, Amendment No. 1) and Type B Water Licences (2BE-MRY1421) issued to the Company by the Nunavut Water Board (NWB). In addition to regulating water usage, Baffinland's water licences regulate many aspects of the Company's waste management practices, construction and operation activities, aquatic effects monitoring, emergency response planning and the abandonment, reclamation and closure of the Project.

This Operational Environment Standard highlights the key terms and conditions of Baffinland's water licences and other approvals governing water use.

2.4.2 ENVIRONMENTAL PROTECTION MEASURES

CAMP WATER SUPPLY

- Only approved water sources shall be used for Project activities.
- The Mary River Mine Site will obtain water from Camp Lake.
- The Milne Port Camp is approved to obtain water from Phillips Creek during the summer (open water) and km 32 lake or another approved source during the winter.
- Water supply facilities are to be maintained to the satisfaction of the ~~AANDC~~ [CIRNAC](#) Inspector.
- Total volumes of water withdrawn from any water body by Baffinland will be recorded and provided to the Environment Department upon request using the Water Collection Log (Section 3.4).
- Daily water usages volumes for Project Sites shall not exceed volumes outlined in Baffinland's Type A Water Licence (2AM-MRY1325, Amendment No. 1), as shown below in TABLE 2.4- 1



	Environmental Protection Plan	Issue Date: <u>May 1, 2019</u> August 30, 2016 Revision: 1 <u>For review purposes only</u>	Page 33 of 34
	Environment	Document #: BAF-PH1-830-P16-0008	

TABLE 2.4- 1: WATER USE FOR DOMESTIC AND INDUSTRIAL PURPOSES DURING THE CONSTRUCTION PHASE

<u>Site</u>	<u>Source</u>	<u>Construction Phase Authorized Water Use Volume (m³/day)</u>	<u>Operation Phase Authorized Water Use Volume (m³/day)</u>
<u>Milne Port (Milne Inlet)</u>	<u>Phillips Creek (summer)</u>	<u>367.5</u>	<u>367.5</u>
	<u>km 32 Lake (winter)</u>		
<u>Mine Site (Mary River)</u>	<u>Camp Lake</u>	<u>657.5</u>	<u>355.4</u>
<u>Steensby Port (Steensby Inlet)</u>	<u>ST 347 km Lake</u>	<u>435.8</u>	<u>243.6</u>
	<u>3 km Lake</u>		
<u>Ravn River</u>	<u>Camp Lake</u>	<u>145.2</u>	
<u>Mid-Rail</u>	<u>Nivek Lake (summer)</u>	<u>79.5</u>	
	<u>Ravn Camp Lake (winter)</u>		
<u>Cockburn North (Tunnels Camp)</u>	<u>Cockburn Lake</u>	<u>101.4</u>	
<u>Cockburn South Camp</u>	<u>Cockburn Lake</u>	<u>111.1</u>	

<u>Project Site</u>	<u>Maximum Daily Water Usage (m³ per day)</u>
<u>Mine Site (Mary River)</u>	<u>657.5</u>
<u>Milne Port</u>	<u>68.5</u>
<u>Steensby Exploration Camp</u>	<u>435.8</u>
<u>Mid-Rail Exploration Camp</u>	<u>79.5</u>

- ~~Streams cannot be used as a water source unless authorized and approved by the Nunavut Water Board.~~
- If water is required from a source that may be drawn down (small lake or stream), Baffinland shall submit a request for approval to the Board 15 days prior to withdrawing the water.
- Work shall be performed in such a way as to ensure that materials such as sediment, fuel or any other hazardous material do not enter watercourses and waterbodies through the implementation of sediment control measures and proper hazardous materials management practices. In the event of a release to the environment, a spills contingency plan shall be implemented.

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 34 of 35
	Environment	Document #: BAF-PH1-830-P16-0008	

- [The Licensee may recycle water and use reclaimed water from the various Treatment Facilities, surface water management ponds and embankment dams and approved discharge locations under the licence if such waters meet appropriate discharge criteria for those facilities.](#)
- All water intake hoses shall be equipped with a screen of an appropriate mesh size (as approved by the DFO) to ensure that fish are not entrained. Additionally, operators will ensure the water intake hoses withdraw water at such a rate that fish do not become impinged on the screen. [Additional guidance regarding fish screens on water intakes is provided below.](#)
- Measures shall be provided to prevent and control erosion on banks of any body of water.
- Equipment shall not be washed in any watercourse or waterbody.
- No fuelling and/or servicing of equipment shall occur within 31 metres of any water body.

For water use associated with drilling programs, see Operational Environment Standards: Geotechnical Drilling Operations (Section 2.5) and Exploration Drilling Operations (Section 2.21).


[DUST SUPPRESSION ALONG TOTE ROAD AND NORTH RAILWAY](#)

[Suitable water sources for dust suppression along the Milne Inlet Tote Road and along adjacent North Railway \(to be constructed\) were reviewed. The Fresh Water Supply, Sewage and Wastewater Management Plan \(BAF-PH1-830-P16-0010\) lists approved water sources under the Type A Water Licence. Water can be extracted from these small stream sources during June and July in any year, but in drier years, water withdrawals are prohibited during August and September. Consult the Environmental Coordinator or Superintendent before withdrawing waters from the streams to verify if it is a wet or dry year and if water withdrawals are authorized. The Fresh Water Supply, Sewage and Wastewater Management Plan also lists the maximum water take allowed at each location.](#)

[SCREENS ON WATER TRUCK INTAKE HOSES](#)

[A fish screen is required under Section 30 of the Fisheries Act, where a water intake, ditch or canal constructed or adapted for conducting water from any Canadian fisheries. The fish screen is used to cover the water intake structure in order to prevent the passage or impingement of fish. The department of Fisheries and Oceans \(DFO\) provides a guideline titled, “Freshwater Intake End-of-pipe Fish Screen Guideline” to assist in the design and installation of fish screens. The following EPP provides a practical guideline \(adapted from the DFO guideline\) for implementing fish screens where fresh water is extracted from fish bearing waters at the Baffinland Project.](#)

[Freshwater will be extracted from fish bearing water for use in dust suppression around the project site, largely focusing on the Milne Inlet Tote Road \(Tote Road\) and the railway construction right-of-way \(ROW\). Dust suppression is completed using water trucks with a capacity of 8,000 US gallons, equivalent](#)

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 35 of 36
	Environment	Document #: BAF-PH1-830-P16-0008	

[to 30,000 L \(Baffinland, 2017\). The water trucks are equipped with onboard water pumps \(Bowie 3300 pumps\) powered by the trucks' engines.](#)

[Fish present in freshwaters at the Baffinland Project include the Arctic Char and the Ninespine Stickleback. Fish screens are designed to protect fish with a minimum fork length of 25 mm and a maximum endurance time of 10 minutes, by limiting approach velocities to approximately 0.11 m/s.](#)


[All water intake hoses shall be equipped with a screen of an appropriate mesh size \(as approved by the DFO\) to ensure that fish are not entrained. Additionally, operators will ensure the water intake hoses withdraw water at such a rate that fish do not become impinged on the screen.](#)

[The following fish screen designs meet the above DFO criteria for water take during dust suppression activities:](#)

- [• Cylindrical Screen: 0.10 m diameter and 0.85 m length](#)
- [• Box Screen: 0.10 m x 0.10 m width and 0.68 m length](#)
- [• Circular Screen: 0.59 m diameter](#)
- [• Square Screen: 0.52 m width x 0.52 m length](#)

[Typical end of pipe installation guidelines \(DFO, 1995\):](#)

- [• Screens should be in areas and depths of water with low concentrations of fish throughout the year.](#)
- [• Screens should be located away from natural or man-made structures that may attract fish that are migrating, spawning, or in rearing habitat.](#)
- [• The screen face should be oriented in the same direction as the flow.](#)
- [• Ensure openings in the guides and seals are less than the opening criteria to make "fish tight".](#)
- [• Screens should be located a minimum of 300 mm \(12 in.\) above the bottom of the watercourse to prevent entrainment of sediment and aquatic organisms associated with the bottom area.](#)
- [• Structural support should be provided to the screen panels to prevent sagging and collapse of the screen.](#)
- [• Large cylindrical and box-type screens should have a manifold installed in them to ensure even water velocity distribution across the screen surface. The ends of the structure should be made from solid materials and the end of the manifold capped.](#)
- [• Heavier cages or trash racks can be fabricated out of bar or grating to protect the finer fish screen, especially where there is debris loading \(woody material, leaves, algae mats, etc.\). A 150 mm \(6 in.\) spacing between bars is typical.](#)

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 36 of 37
	Environment	Document #: BAF-PH1-830-P16-0008	

Typical cleaning and maintenance procedures (DFO, 1995):

- Provision should be made for the removal, inspection, and cleaning of screens.
- Ensure regular maintenance and repair of cleaning apparatus, seals, and screens is carried out to prevent debris-fouling and impingement of fish.
- Pumps should be shut down when fish screens are removed for inspection and cleaning.
- Screens may be cleaned by methods such as air or water, backwashing, removal and pressure washing or scrubbing.
- Under certain site-specific winter conditions, it may be appropriate to remove screens to prevent screen damage.
- Flexible suction pipe may be used instead of solid, fixed piping for ease of screen removal and cleaning.
- Pump suction pressure can be measured to assess the need for screen cleaning.


If another type of mesh or screen design is used, the guidelines for designing these fish screens is provided in DFO's 1995 guideline. Examples of common screen shapes and typical installations of end of pipe installations also are provided in DFO's guideline (DFO, 1995).

2.4.3 FORMS

- Baffinland EPP – Water Collection Log (Section 3.4)

2.4.4 RELATED DOCUMENTS

- Baffinland EPP – Sediment and Erosion Control (Section 2.9)
- NWB - Type A Water Licence (2AM-MRY1325 Amendment No. 1)
- NWB - Type B Water Licence (2BE-MRY1421)
- Baffinland – Freshwater Supply, Sewage and Wastewater Management Plan (BAF-PH1-830-P16-001026)

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 37 of 38
	Environment	Document #: BAF-PH1-830-P16-0008	

2.5 GEOTECHNICAL DRILLING OPERATIONS

SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION #	REVISION DATE
2.5	Geotechnical Drilling Operations	F	July 15, 2014

Geotechnical drilling may be required to obtain soil and rock samples necessary for engineering and designing the Project facilities and infrastructure.


2.5.1 ENVIRONMENTAL CONCERN

Environmental concerns associated with drilling include surface disturbances, drilling fluid and cutting disposal, impacts on dust, noise, water quality, and habitat encroachment. The use of water for drilling purposes is subject to the conditions outlined in Baffinland's Type B Water Licence (2BE-MRY1421).

2.5.2 ENVIRONMENTAL PROTECTION MEASURES

The following protection measures for geotechnical drilling management shall be implemented:


- Pre-Drilling Preparation and Acceptable Drill Locations:
 - A Pre-Drilling Inspection Report (see Section 3.5) shall be completed by the acting supervisor before drilling activities commence.
 - Additional geotechnical investigations shall be undertaken to identify sensitive landforms, modify engineering design for Project infrastructure, develop and implement preventative and/or mitigation and monitoring measures to minimize the impacts of the Project's activities and infrastructure on sensitive landforms.
 - Geotechnical drilling activities may be carried out within 31 m of the ordinary High Water Mark of waterbodies as long as the drilling location has been approved by the Nunavut Water Board. Please confirm all geotechnical drill locations with the Environment Department before drill mobilization.
 - Archaeology clearance shall be obtained from the Environmental Department for all geotechnical drill locations (see Section 2.1).
 - Conduct a wildlife inspection immediately prior to movement of the drill, involving aerial and ground survey of the new site. For details on drilling restrictions associated with wildlife interactions, see Operational Environment Standards: Polar Bear Encounters (Section 2.10), Fox and Wolf Encounters (Section 2.11), Caribou Protection Measures (Section 2.12) and Bird Protection Measures (Section 2.13).
 - Implement sediment and erosion control measures prior to drilling operations and maintain these during the operation to minimize transport of sediment into adjacent water bodies. Prior to the commencement of drilling for each hole, establish a dedicated sump location where collected "dirty" drill water and cuttings are to be disposed. The location shall be a minimum of 31 m from surface water bodies and located such that any flow toward a surface water body is minimized (sump shall be in a bowl, depression or be on a flat surface).

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 38 of 39
	Environment	Document #: BAF-PH1-830-P16-0008	

- Drill Operation and Movements:

- Material shall not be stored on the surface of frozen streams or lakes, including immediate banks, except materials that are for immediate use.
- All drill waste, including water, chips, muds and salts (CaCl₂) from land based drilling shall be disposed in a properly constructed sump or natural depression located at least 31 m above the High Water Mark of any water body.
- All activities, including the overland transport of workers, shall be conducted in such a way to minimize ground disturbance.
- All waste, such as food and packaging, shall be collected for disposal at the camp.
- Feeding of all wildlife is prohibited.
- Equipment or vehicles shall not be moved unless the ground surface is in a state capable of fully supporting the equipment or vehicles without rutting or gouging.
- Daily inspections for fuel/hydraulic leaks, equipment condition, sediment and erosion control, and water intakes shall be conducted prior to commencing Work activities at the start and end of each work shift/day. All leaks shall be immediately repaired.
- All drill rigs shall be equipped with spill kits in the event of leaks and spills. All operators should be trained in spill response and be familiar the use of spill kits.
- In case the bottom of the permafrost is broken through by the drill, the depth of the bottom and location shall be reported immediately to the Environment Department who shall in turn report to the Nunavut Water Board.
- Equipment shall not obstruct any stream.
- Equipment storage holding areas will be located on gravel, sand or other durable land 31 m above the ordinary High Water Mark of any waterbody in order to minimize impacts on surface drainage and water quality.
- Establish water quality conditions prior to and upon completion of any on-ice drilling program See Operational Environment Standard: Water Sampling for On-Ice Drilling (Section 2.22) for more details.
- [All water intake hoses shall be equipped with a screen of an appropriate mesh size to ensure that fish are not entrained \(refer to Section 2.4.2\). Additionally, operators will ensure the water intake hoses withdraw water at such a rate that fish do not become impinged on the screen.](#)
- Contain and re-circulate drill water to the fullest extent possible in order to reduce water usage. Utilize silt fences and natural depressions to prevent water from running into nearby watercourses and water bodies.
- Separate clean water from “dirty” water streams whenever possible, (by means of hose extensions and snow berms or other means that direct and keep discharge away from the immediate area of the drill hole) to prevent migration and expansion of a “dirty” water plume.

- Work shall be performed in such a way as to ensure that materials such as sediment, fuel and/or any other hazardous material does not enter watercourses and waterbodies through the implementation of sediment control measures and proper hazardous materials management practices. In the event of a release to the environment, the approved Spills Contingency Plan shall be implemented.
 - To maximize drill return water recirculation, casing is to be frozen into the ground to a depth of 3 to 6 m below grade. The specific depth of casing to be frozen into each hole and length of time to allow for freezing will be specified by the acting Supervisor.
 - The drill water and cuttings spillage footprint shall be minimized through the use of berms, silt fences and/or other means of containment.
 - Dispose of drill water into a properly constructed sump, or a naturally occurring contained depression. Drill water shall not be released directly to a nearby water course or to the ground.
 - Use portable containment sumps (bins), for drill water and cuttings where containment in the ground is impractical. The bins shall not overflow and shall be dumped by means of helicopter or pump, to the location identified for disposal of dirty drill water and cuttings.
 - Drilling waste must not be allowed to spread to the surrounding land or water bodies; the footprint of any spillage must be minimized to the greatest degree practicable.
 - In case of an artesian flow occurrence, drill holes shall be immediately plugged and permanently sealed to prevent induced contamination of groundwater or salinization of surface waters. Report the artesian flow occurrence as soon as possible to the Environment Department who in turn will report the occurrence to the Nunavut Water Board.
 - For on-ice drilling, returned water released must be nontoxic, and not result in an increase in Total Suspended Solids (TSS) in the immediate receiving water above the CCME guidelines for the protection of Fresh Water Aquatic Life (i.e., 10 mg/L for lakes with background levels under 100 mg/L or 10% for those above 100 mg/L).
- **Drill Hole Abandonment:**
 - Materials such as debris and/or drill cuttings shall not be left on the ice when there is potential for that material to enter a water body.
 - Restore, contour and stabilize constructed drill sumps, and other disturbed areas, to the pre-disturbed state immediately upon completion of drilling.
 - Return all combustible waste and petroleum products to camp for proper management and disposal.
 - Plug all drill holes upon completion, and where possible return drills cuttings at the surface to the drill hole at all land-based drilling locations.
 - Contour and stabilize all other disturbed areas upon completion of work and restore these areas to a pre-disturbed state.
 - Upon completion of a hole in rock, the casing will be removed. If the casing cannot be removed it will be cut off to be flush with surface and backfilled.

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 40 of 41
	Environment	Document #: BAF-PH1-830-P16-0008	


- Remove all non-combustible garbage and debris from the land use area to an approved disposal site.
- A Post-Drilling Inspection Report (see Section 3. – Drill Inspection Forms - Pre-Drilling, Daily and Post Drillings) will be filled out at the completion of each drill hole.
- Ensure a copy of all Pre-Drilling, Post-Drilling and Daily Drill Inspection Reports for all drill holes are submitted to the Environment Department at the completion of each drilling program.

2.5.3 FORMS

- Baffinland EPP – Drill Inspection Forms: Pre-Drilling, Daily and Post Drilling (Section 3.5)

2.5.4 RELATED DOCUMENTS

- Baffinland EPP – Sediment and Erosion Control (Section 2.9)
- Baffinland EPP - Polar Bear Encounters (Section 2.10)
- Baffinland EPP - Fox and Wolf Encounters (Section 2.11),
- Baffinland EPP - Caribou Protection Measures (Section 2.12)
- Baffinland EPP - Bird Protection Measures (Section 2.13)
- Baffinland EPP – Exploration Drilling Operations (Section 2.21)
- Baffinland EPP – Water Sampling for On-Ice Drilling (Section 2.22)
- Baffinland – Freshwater Supply, Sewage and Wastewater Management Plan (BAF-PH1-830-P16-0010)
- Baffinland – Surface Water and Aquatic Ecosystem Management Plan (BAF-PH1-830-P16-0026)
- NWB - Type B Water Licence – 2BE-MRY1421
- Exploration Spill Contingency Plan (BAF-PH1-830-P16-0037)
- Emergency Response Plan (BAF-PH1-830-P16-0007)

	Environmental Protection Plan	Issue Date: <u>May 1, 2019</u> August 30, 2016 Revision: <u>1</u> For review purposes only	Page 41 of 42
	Environment	Document #: BAF-PH1-830-P16-0008	

2.6 EQUIPMENT OPERATION AND MOBILIZATION

SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION #	REVISION DATE
2.6	Equipment Operations & Mobilization	F	May 10, 2016


2.6.1 ENVIRONMENTAL CONCERNS

Mobile equipment emits noise and air emissions, are potential sources of leaks and spills and can cause rutting and land disturbances, as well as disturbance of archaeological sites if necessary clearances have not been obtained.

Noise associated with equipment use and mobilization may negatively affect neighbours. Air emissions may have air quality implications. Accidental leaks or spills of fuel or other hazardous materials may affect soils, water quality, fish and fish habitat, and wildlife.

2.6.2 ENVIRONMENTAL PROTECTION MEASURES

- Damage to archaeology sites will be avoided by following the protection measures outlined in the Operational Environment Standard: Cultural Heritage and Archaeology Resources (Section 2.1).
- Rutting and land disturbance will be minimized by following the protection measures outlined in the Operational Environment Standard: Land Disturbance (Section 2.3).
- All equipment will be equipped with properly functioning mufflers.
- All spills involving equipment shall be reported to the Environment Department immediately and documented by submitting the necessary documentation within 12 hours of the spill using the Baffinland Incident Investigation Form (BAF-PH1-810-FOR-0005) and NT-NU Spill Report Form (Section 3.6). See Operational Environment Standard: Spill Control Measures and Reporting (Section 2.33) for more details on spill reporting.
- Daily pre-operation inspections will be made on all equipment using the Pre-Op Inspection Form. Pre-Op Inspection Forms should be given to the Maintenance Department at the end of day. If problems are identified the Maintenance Department should be notified and the equipment will be taken out of service and repaired.
- Equipment operators will be trained and licenced to operate their particular equipment; training will be provided for operators before operating any new equipment.
- Equipment and vehicles that will remain parked for extended periods of time or that are prone to leaks will have spill trays placed underneath them to contain any fluid leaks.


	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 42 of 43
	Environment	Document #: BAF-PH1-830-P16-0008	

2.6.3 FORMS

- Baffinland – Baffinland Incident Investigation Form (BAF-PH1-810-FOR-0005)
- Baffinland – NT-NU Spill Report Form (Section 3.6)
- Baffinland – Pre-Op Inspection Form

2.6.4 RELATED DOCUMENTS

- Baffinland EPP – Cultural Heritage and Archaeological Resources (Section 2.1)
- Baffinland EPP – Land Disturbance (Section 2.3)
- Baffinland EPP – Spill Control Measures and Reporting (Section 2.33)
- Baffinland – Air Quality and Noise Abatement Management Plan (BAF-PH1-830-P16-0002)

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 43 of 44
	Environment	Document #: BAF-PH1-830-P16-0008	

2.7 FUEL STORAGE AND HANDLING

SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION #	REVISION DATE
2.7	Fuel Storage and Handling	G	May 10, 2016

Permanent and temporary fuel storage facilities have been constructed at Project Sites. At Milne Port and the Mary River Mine Site, fuel is stored in bulk storage facilities consisting of steel fuel tanks and bladders located within lined containment berms. Small quantities of fuel are being stored in barrels and double walled ISO tanks within constructed containment berms at the Steensby and Mid-Rail Exploration Camps.


2.7.1 ENVIRONMENTAL CONCERNS

Accidental and uncontrolled leaks, releases and spills of fuel may occur due to improper storage, poor handling procedures or equipment malfunction. Fuel releases to the environment have the potential to negatively affect worker health and safety as well as soil quality, aquatic life and wildlife. The potential for fuel spills is addressed through the Company's Emergency Response and Spill Contingency Management Plans

2.7.2 ENVIRONMENTAL PROTECTION MEASURES

The following environmental protection measures shall be used for all storage and handling of fuels at the Project:

- Project personnel refuelling equipment or vehicles will supervise re-fuelling at all times and will not leave fuel transfer operations unattended.
- Avoiding ship-to-shore transfer of fuel during freeze-up or break-up periods.
- Undertake fuel transfer from vessels to shore under good weather conditions.
- Transfer of fuel to storage tanks or to vehicles shall be conducted by a fully-trained and qualified person.
- Exposed pipelines shall be protected from damage by vehicular collision through the installation of guard rails or barriers.
- Hoses and pipes used for fuel transfer shall be equipped with properly functioning and approved check valves that are spaced to prevent backflow of fuel in the case of failures.
- All spills shall be reported to the Environment Department immediately and documented by submitting the necessary documentation within 12 hours of the spill to using the Baffinland Incident Investigation Form (BAF-PH1-810-FOR-0005) and NT-NU Spill Report Form (Section 3.6). See Operational Environment Standard: Spill Control Measures and Reporting (Section 2.33) for more details on spill reporting.

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 44 of 45
	Environment	Document #: BAF-PH1-830-P16-0008	


- All fuel storage tanks will be inspected on a regular basis and will be in accordance with the requirements outlined in the Environmental Code of Practice for Aboveground Storage Tank Systems Containing Petroleum Products, issued by the Canadian Council of Ministers of the Environment.
- Daily inspections of the permanent fuel storage and dispensing facilities, located at Milne Port and the Mary River Mine Site, will be conducted by the Site Services Department using the Daily Tank Farm Inspection Checklist (Section 3.7).
- Fuel tanks at the permanent fuel storage and dispensing facilities, located at Milne Port and the Mary River Mine Site, will be dipped every 3 days by the Port & Logistics Department to confirm fuel levels and total fuel inventory using the Fuel Tank Dipping Form (Section 3.8).
- Fuel storage containers will be stored in secondary containment and shall not be placed within 31 m of ordinary High Water Mark of any water body.
- All mobile equipment will be serviced and fuelled on land at least 31 m above the ordinary High Water Mark of any water body. No petroleum or chemical product will be allowed to spread to surrounding lands or into water bodies.
- All fuel containers shall be sealed and labelled with the name Baffinland Iron Mines Corporation.
- Waste oils, lubricants, and other used oil shall be placed in drums, labeled as waste materials, and stored in a contained area until removed from site for disposal at an approved, licenced waste management facility (Section 2.16 - Hazardous Material & Hazardous Waste Management).
- All fuel storage areas shall be inspected on a regular basis. See Operational Environment Standard: Compliance Inspections (Section 2.32). Examine all fuel storage containers in your work area for leaks at least once per day.
- Repair all leaks immediately.

2.7.3 FORMS


- Baffinland – Daily Fuel Tank Farm Inspection Checklist (Section 3.7)
- Baffinland – Fuel Tank Dipping Form (Section 3.8)
- Baffinland – Baffinland Incident Investigation Form (BAF-PH1-810-FOR-0005)
- Baffinland – NT-NU Spill Report (Section 3.6)

2.7.4 RELATED DOCUMENTS

- Baffinland EPP – Hazardous Material & Hazardous Waste Management (Section 2.16)
- Baffinland EPP – Spill Control Measures and Reporting (Section 2.33)
- Baffinland – Surface Water and Aquatic Ecosystem Management Plan (BAF-PH1-830-P16-0026)

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 45 of 46
	Environment	Document #: BAF-PH1-830-P16-0008	

- Baffinland – Emergency Response Plan (BAF-PH1-830-P16-0007)
- Baffinland – Spill Contingency Plan (BAF-PH1-830-P16-0036)
- Baffinland - Exploration Spill Contingency Plan (BAF-PH1-830-P16-0037)
- Baffinland – Milne Port Oil Pollution Emergency Plan (BAF-PH1-830-P16-0013)
- Baffinland – Bulk and Equipment Re-Fueling Procedure (BAF-PH1-350-PRO-0010)
- NWB – Type A Water Licence (2AM-MRY1325 Amendment No. 1)

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 46 of 47
	Environment	Document #: BAF-PH1-830-P16-0008	

2.8 AIRCRAFT FLIGHTS

SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION #	REVISION DATE
2.8	Aircraft Flights	G	May 10, 2016

The construction and operation phases of the Project involves air traffic consisting of flights made by helicopters, smaller twin-engine fixed wing aircraft and chartered flights by commercial jets. The high level of aircraft use requires pilots, and Project Personnel directing pilots, to be aware of the potential disturbances to wildlife and the requirements of the various permits and licences issued to Baffinland. Additionally, Inuit hunters may be moving through the Project Area at any time of the year, and Baffinland has committed to minimizing disturbance of local users to the extent possible. All Project Personnel are responsible for operating in accordance with the legal requirements and commitments outlined in this Operational Environment Standard. However, that being said, safety is the most critical aspect of aircraft operations and safety considerations supersede other concerns.

2.8.1 CONCERNS REGARDING WILDLIFE

Aircraft can cause disturbance to wildlife by interrupting their activities (i.e. feeding, calving, migration, etc.) and possibly causing the animals to leave an area and important habitats. Caribou, important to Inuit culture and diet, can be sensitive to aircraft noise. Disturbance of caribou has the greatest effect prior to, during and following calving (approximately mid-May to mid-July). Migratory birds are also disturbed by low-level overflights.

2.8.2 CONCERNS REGARDING INUIT LAND USE

Aircraft can disturb hunters or other land users (i.e. tourists) during low level flights that disturb the people and/or the wildlife they may be pursuing. Land users travel over land and ice from roughly November through late June/early July. August is particularly important for boats due to the short duration of open water. Land users may travel by boat and camp in Milne Inlet, and may travel inland hunting caribou by walking or using all-terrain vehicles. Remember that local land users were here first.


2.8.3 ENVIRONMENTAL PROTECTION MEASURES

- Minimize the number of flights to the extent possible.
- Subject to safety requirements, aircraft will maintain a cruising altitude of at least:
 - 650 m above ground level minimum, and;
 - 1,100 m vertical and 1,500 m horizontal from observed concentrations of migratory birds. If altitude is not possible, maintain a lateral distance of at least 1,500 m.
 - In July and August, either avoid travelling over, or use a minimum of 1,100 m vertical when travelling over the Snow Goose Area identified in Map 2



The information contained herein is proprietary Baffinland Iron Mines Corporation and is used solely for the purpose for which it is supplied. It shall not be disclosed in whole or in part, to any other party, without the express permission in writing by Baffinland Iron Mines Corporation.

Note: This is an UNCONTROLLED COPY. All staff members are responsible to ensure the latest revision is used.

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 48 of 49
	Environment	Document #: BAF-PH1-830-P16-0008	

- Ensure that certification of noise compliance is current, where compliance is applicable.
- Employees are responsible for reporting to the appropriate supervisor any improper flight practices.
- Avoid caribou calving sites between May 15 and July 15, as identified by Project biologists or observed by aircraft pilots.
- Pilots shall report to the Environment Department caribou movements and locations during calving and post-calving periods, so that these areas can be avoided.
- Avoid large concentrations of wildlife and take alternate routes.
- Plan routes that are likely to have least occurrences of wildlife.
- Hovering or circling may greatly increase disturbances and must be avoided when practical.
- Flights between Pond Inlet and Mary River will be routed so as to minimize interruption with community activities within the fiords between the site and the community.
- The Environment Department will inform pilots of wildlife sensitive area.
- For details on reporting wildlife sightings, refer to Operational Standard: Wildlife Log Instructions (Section 2.23)

2.8.4 EXCEPTIONS


- Low-level flights are required during slinging operations in the vicinity of the Mary River Mine Site Area and Steensby Camp, Milne Port and on occasion at other locations, or where short distances are involved.
- Low-level flights are permitted during wildlife surveys, as directed by the Project biologists in accordance with wildlife research permits.

2.8.5 FORMS

None

2.8.6 RELATED DOCUMENTS

- Baffinland EPP - Polar Bear Encounters (Section 2.10)
- Baffinland EPP - Fox and Wolf Encounters (Section 2.11)
- Baffinland EPP - Caribou Protection Measures (Section 2.12)
- Baffinland EPP - Bird Protection Measures (Section 2.13)
- Baffinland – Air Quality and Noise Abatement Management Plan (BAF-PH1-830-P16-0002)

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016	Page 49 of 50
	Environment	Revision: 1 For review purposes only	Document #: BAF-PH1-830-P16-0008

2.9 SEDIMENT AND EROSION CONTROL

SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION #	REVISION DATE
2.9	Sediment and Erosion Control	F	May 10, 2016

Land disturbances during road construction and operation, culvert installation and excavation of borrow locations and quarries have the potential to cause erosion and release sediment-laden runoff into nearby watercourses. Sediment and erosion control measures may include, but are not limited to, silt fencing, erosion control mats (fascines), sedimentation ponds, erosion blankets/geotextile lining, sand bags, terraces, benching, use of flocculants and riprap structures. Project Personnel are responsible for the implementation of erosion and sedimentation control measures prior to the initiation of construction activities and during ongoing mining Operations (i.e., clearing, grubbing, development of facilities, etc.) in each specific work area.

2.9.1 ENVIRONMENTAL CONCERN


The potential exists for the movement of soil (wind erosion), the unplanned release of sediment to watercourses/waterbodies and the slumping or change in landscape form associated with changes in the permafrost profile. Stormwater, which may include any surface runoff and flows resulting from precipitation, drainage or other sources, may contain suspended sediments, metals, petroleum hydrocarbons, and other substances. These materials may affect water clarity and, subsequently, aquatic life by reducing feeding success, fish egg and larval survival and fish habitat. Rapid runoff can degrade the quality of the receiving water by eroding stream beds and banks. Wind erosion is a key issue for the Project. The arid climate allows the wind to transport unprotected/disturbed soils from current locations. Improved road surfaces will increase potential runoff in downstream areas throughout the Project Area.

2.9.2 ENVIRONMENTAL PROTECTION MEASURES

As required, Project Personnel may be instructed to implement additional sediment and erosion control measures by the Project's Environment Department to ensure protection of the environment.

The following environmental protection procedures/measures will be taken to prevent or mitigate erosion and sediment-laden runoff impacts:

- The Surface Water and Aquatic Ecosystem Management Plan will be adopted to prevent and/or mitigate sediment loading into surface water within the Project Area.
- The size of the disturbed area and duration of soil exposure shall be limited as specified in the construction schedule and "Issued for Construction" drawings.
- Road embankments, watercourse crossing installations and borrow areas shall be constructed in accordance with approved plans and procedures.

	Environmental Protection Plan	Issue Date: May 1, 2019 <u>August 30, 2016</u> Revision: 1 <u>For review purposes only</u>	Page 50 of 51
	Environment	Document #: BAF-PH1-830-P16-0008	


- Temporary and permanent drainage installations shall be designed, constructed, and maintained to an appropriate standard, while maintaining hydrologic drainage patterns to the extent possible.
- The topsoil/overburden stockpiles shall be contoured, where possible, with established drainage routes around the stockpiles, as specified by the Environment Department.
- Stream bank sections and slopes that contain loose or erodible materials shall be stabilized through the application of filter fabrics or geotextile in conjunction with riprap. Sediment control measures will be installed prior to watercourse crossing installations (Section 2.18 - Tote Road Watercourse Crossing Installation).
- Appropriate sediment and erosion control measures will include a combination of silt fences, silt (turbidity) curtains, sediment traps, settling ponds and gravel berms.
- Access and haul roads shall be constructed with gradients or surface treatment and drainage systems to limit the potential for run-off and erosion (Section 2.17 – Road Construction and Borrow Development).
- Borrow activities will be concentrated to the maximum extent possible to limit the area of disturbance.
- At borrow areas, drainage patterns will be re-established to near natural conditions.
- Turbidity monitoring will be conducted at watercourses by Environmental Monitors during and after construction activities when necessary.
- Project Personnel shall maintain, as required, all sediment and erosion control measures following rain or storm events to minimize further environmental damage. All repairs shall be undertaken under the direction and to the satisfaction of the Environment Department.

2.9.3 FORMS

None

2.9.4 RELATED DOCUMENTS

- Baffinland EPP – Road Construction and Borrow Development (Section 2.17)
- Baffinland EPP - Tote Road Watercourse Crossing Installation (Section 2.18)
- Baffinland - Surface Water and Aquatic Ecosystem Management Plan (BAF-PH1-830-P16-0026)

	Environmental Protection Plan	Issue Date: <u>May 1, 2019</u> August 30, 2016 Revision: <u>1</u> For review purposes only	Page 51 of 52
	Environment	Document #: BAF-PH1-830-P16-0008	

2.10 POLAR BEAR ENCOUNTERS

SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION #	REVISION DATE
2.10	Polar Bear Encounters	F	May 10, 2016

2.10.1 ENVIRONMENTAL CONCERN

Polar Bear-bear encounters at the Mary River Project pose an immediate threat to life, health, safety, environment and property. Therefore, the Polar Bear Safety Plan (Plan) is to be used in conjunction with Baffinland's Emergency Response Plan (BAF-PH1-830-P16-0007) which provides the following guidance:

- Ensure the safety and well-being of personnel, the environment, and property
- Identify the types of emergencies that may occur and the procedures to respond, intervene, stop, or limit the emergency situation
- Ensure effective communication between personnel and the mine rescue team
- Ensure that personnel responding to emergencies are trained and have appropriate resources for the response


Polar bears are protected in Canada where they are legally hunted. Seasons, protected categories and quotas apply. The purpose of the Wildlife Act (statute of Nunavut) is to establish a comprehensive regime for the management of wildlife and habitat. The legislation provides that it is legal for anyone to attempt to deter, and if necessary destroy, a bear in defense of life or property. Any bear killed must be reported to the nearest conservation officer. It is an offense to allow the hide of a polar bear to spoil.

Site Personnel are required to comply with the requirements provided in the Polar Bear Protection Plan.

2.10.2 ENVIRONMENTAL PROTECTION MEASURES

The following measures must be implemented to minimize the potential for bear-human encounters:

- Site and working areas will be kept clean of food scraps and garbage at all times. Effective waste management is paramount to reducing the likelihood of encounters.
- Do not attempt to chase, catch or follow polar bears under any circumstance.
- Polar bears that attempt to approach work sites or personnel must be actively deterred by shouting or use of noise makers such as bear bangers whenever possible.
- All polar bear sightings must be reported immediately to the Environmental Superintendent or his designate, regardless of the time of day.
- Bear monitors will be posted at coastal locations and will accompany remote field crews that do not have full-time air support.

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 52 of 53
	Environment	Document #: BAF-PH1-830-P16-0008	


- The Environmental Superintendent or his designate will authorize and coordinate the use of deterrent measures. A defence kill is to be used as an absolute last resort only when there is an imminent risk to human safety.
- Helicopters may be used to haze/deter polar bears away from camps only under the authorization and direction of the Environmental Superintendent or his designate.
- Any defensive kills must be reported immediately to the Environmental Superintendent or his designate, who will notify the Qikiqtani Inuit Association (QIA), Hunters and Trappers Organization (HTO), wildlife officer and other stakeholders as required. The Inuit Impact Benefit Agreement (IIBA) outlines the protocol to be followed in the event of a defensive kill. The meat must not be allowed to spoil and the animal will need to be dressed immediately and the meat and pelt appropriately stored until transportation is available to the designated affected community, in accordance with the IIBA.
- Polar bear safety is a part of the Site Orientation Program.
- Please refer to the Polar Bear Safety Plan that has been developed for more information on mitigation measures and safety measures pertaining to polar bear encounters.
- Routine completion of a Polar Bear Readiness Audit to ensure that all Polar Bear incidents are documented and promptly reported to regulators and that all preparation and requirements regarding Polar Bear mortalities are in place.

2.10.3 FORMS

- Polar Bear Readiness Audit Form (Section 3.9)

2.10.4 RELATED DOCUMENTS

- Baffinland - Polar Bear Safety Plan (BAF-PH1-830-P16-0041)
- Inuit Impact Benefit Agreement
- QIA Directive 2013-1-17-2
- Polar Bear Readiness Procedure and Audit (Appendix A)

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016	Page 53 of 54
	Environment	Revision: 1 For review purposes only	Document #: BAF-PH1-830-P16-0008

2.11 FOX AND WOLF ENCOUNTERS

SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION #	REVISION DATE
2.11	Fox and Wolf Encounters	E	May 10, 2016


2.11.1 ENVIRONMENTAL CONCERN

Foxes and wolves can become habituated to sites where they can access food and food waste. This situation can arise from intentional feeding by Project Personnel or improper waste management practices. Once such food conditioning has occurred, these animals lose their fear of humans and may approach Project Personnel in an aggressive fashion. Rabies is usually endemic in fox populations. Habituated foxes that act aggressively need to be dealt with immediately.

2.11.2 ENVIRONMENTAL PROTECTION MEASURES

The following measures will be implemented to minimize potential impacts to foxes and wolves and the associated risk to the health and safety of Project Personnel:

- Site and working areas will be kept clean of food scraps and garbage. All waste will be disposed of in accordance with the Baffinland Waste Management Plan (BAF-PH1-830-P16-0028).
- Wildlife will not be intentionally fed under any circumstances. The consequences of such actions will lead to major disciplinary action.
- Solid carnivore proof skirting shall be installed on all kitchen and accommodation buildings to prevent foxes from venturing under buildings.
- Fox and wolf sightings should be recorded in the Wildlife Log (see Section 3.2) at camp. Wolf sightings should be reported to the Environment Department immediately.
- Wildlife attempting to approach personnel will be deterred by shouting, chasing and using noise makers, such as bear bangers. Should those deterrents not work, the site Environmental and Health & Safety Supervisors will be notified immediately for their assessment. Typically, wolves can be readily deterred by the above methods. Based on site experience, foxes are less responsive to deterrence. Due to the high incidence of rabies in foxes on Baffin Island, foxes that exhibit aggressive behaviour to humans, regardless of deterrence measures, are presumed to be rabid. The Environmental and Health & Safety Supervisors will assess the situation and make the recommendation for or against dispatching a likely rabid fox by lethal shot.
- In the rare situation where a lethal shot is necessary, approval to proceed will be provided by the Environment Supervisor for the location. Only personnel authorized and trained in the use of firearms will be used. This task will be executed so that Project Personnel, equipment and infrastructure are not endangered. If rabies is suspected, a body shot will be taken, and the carcass will be handled to

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 54 of 55
	Environment	Document #: BAF-PH1-830-P16-0008	

avoid direct physical contact. The carcass will be incinerated immediately, and the Conservation Officer in Pond Inlet will be notified.


- Fox and wolf interactions with Project activities will be documented and included in the Wildlife Logs (see Section 3.2) and annual reports.
- No drilling activity should take place within 2 km of an active wolf den between mid-May and mid-August if direct line of sight and disturbance is noted. Contact on-site Environment staff to determine if a den is in the vicinity of operations.
- Qualified biologists will survey for carnivore (wolf and fox) dens, and an avoidance zone will be identified in consultation with the Project biologist. Den locations will be identified and Project Personnel advised accordingly. All Project personnel will adhere to wildlife and den avoidance guidelines during the denning season.

2.11.3 FORMS

- Baffinland EPP – Wildlife Log (Section 3.10)

2.11.4 RELATED DOCUMENTS

- Baffinland EPP – Wildlife Log Instructions (Section 2.23)
- Baffinland – Terrestrial Environment Mitigation and Monitoring (BAF-PH1-830-P16-0027)
- Baffinland - Waste Management Plan (BAF-PH1-830-P16-0028)

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 55 of 56
	Environment	Document #: BAF-PH1-830-P16-0008	

2.12 CARIBOU PROTECTION MEASURES

SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION #	REVISION DATE
2.12	Caribou Protection Measures	F	May 10, 2016

2.12.1 ENVIRONMENTAL CONCERN


Caribou are currently present in relatively low numbers in the Project Area, but their numbers and encounter rates are expected to increase through the life of the Project. Caribou harvesting is important to local communities, so there is added importance to ensuring that the Project operates with minimal potential effects on caribou. The potential effects on caribou include those from disturbance, primarily due to noise and other sensory disturbances from project activities. The primary mitigation for caribou is avoidance followed by monitoring.

A Zone of Influence (ZOI) of 3 km from project activities has been defined for stationary activities such as camps, mining and drilling during the pre- to post-calving time period of May 15 to July 15. At other times of the year the caribou are less sensitive and a ZOI of less than 3 km is likely.

2.12.2 ENVIRONMENTAL PROTECTION MEASURES

The following measures will be implemented to minimize disturbance to caribou:

- Employees that are not Nunavut Land Claim beneficiaries will not be permitted to hunt or fish on any land accessed from the Project. All personnel shall return home between shift rotations and shall not be permitted to stay in the area to hunt or fish as part of their shift rotations.
- Mobile equipment and vehicles shall yield the right-of-way to wildlife.
- Traffic is to slow down and keep distance from the animals as much as possible. If necessary, traffic [\(including trains\)](#) will stop to enable crossings of groups or to allow groups of caribou paralleling the road to move into adjacent habitat. Caribou occurrence in the vicinity of the road [and railway](#) and their responses to traffic will be monitored by on the ground behavioral observations, to determine if it is apparent that caribou are being disturbed or displaced by construction or traffic. Specific guidance is provided in the Caribou Encounter Decision Tree located in Appendix B.
- All caribou sightings will be reported to the Environment Department and they will keep geo-referenced records of caribou sightings. This will enable Project biologists to monitor caribou activity in relation to the Project.
- Active caribou calving sites (as identified by Project biologists or observed by aircraft pilots) will be avoided between May 15 and July 15, and where possible, there will be no increase in mine construction or operational activity within 3 km of the calving sites during this time period.

	Environmental Protection Plan	Issue Date: May 1, 2019 <u>August 30, 2016</u> Revision: 1 <u>For review purposes only</u>	Page 56 of 57
	Environment	Document #: BAF-PH1-830-P16-0008	


- If any females (one or more) are observed within 3 km of a planned project activity such as drilling or road [and railway](#) construction from May 15 through to July 15, then the activity location will either be moved or the activity deferred as appropriate and if possible, until a later date when caribou are not present.
- Should a female caribou or a female with calves approach within 3 km of project activities (between May 15 and July 15), the animals will be observed on the ground. If it is obvious they are being disturbed, the activity will cease until they have moved at least 3 km away.
- If caribou approach a project activity site before work commences, the Environment Department shall be notified immediately and will determine the necessary measures that need to be taken to protect caribou activity.
- If caribou approach a project site while work is in progress, caribou will be observed for signs of disturbance.
- If the caribou are disturbed, the activity will be modified or cease until the caribou have moved away or they are guided away from the worksite.
- If caribou are observed within 3 km of a proposed new drill site and disturbance is noted, the drill should be moved to an alternative location and activity at the site deferred until after the caribou leave the area. If the drill is already in place and operating, and caribou move into the area, the animals should be monitored by the Project biologist or on-site Environmental personnel. If the caribou show no obvious signs of disturbance, drilling activities can continue. If the animals appear agitated, then activities must cease until the caribou leave.
- A wildlife monitor will be periodically present on site during the calving season to detect calving activities near the ~~Tote Road~~ [Northern Transportation Corridor](#), monitor cow/calf behavior in relation to traffic, designate a temporary no-stopping zone, guide traffic and document measures taken to reduce sensory disturbance to calving caribou.
- Monitoring and Mitigation measures will be implemented at points where the railway, roads, trails a flight paths pass through caribou calving areas, particularly during caribou calving times.
- Protocols will be implemented for documentation and reporting of all caribou collisions and mortalities as well as mechanisms for adaptive management responses designed to prevent further interactions.

2.12.3 FORMS


- Baffinland EPP – Wildlife Log (Section 3.10)

2.12.4 RELATED DOCUMENTS

- Baffinland –Terrestrial Environment Mitigation and Monitoring Plan (BAF-PH1-830-P16-0027)

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 57 of 58
	Environment	Document #: BAF-PH1-830-P16-0008	

- Baffinland - Caribou Encounter Decision Tree (Appendix B)
- Baffinland - Hunting and Fishing (Harvesting) Policy – On or Near Baffinland Leased Lands (BAF-PH1-820-POL-0001)

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 58 of 59
	Environment	Document #: BAF-PH1-830-P16-0008	

2.13 BIRD PROTECTION MEASURES

SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION #	REVISION DATE
2.13	Bird Protection Measures	G	May 10, 2016


2.13.1 ENVIRONMENTAL CONCERN

Birds are generally widespread and often encountered in the Baffin region. Virtually all of these birds are migratory. The main concern with birds is that, the potential exists that some aspects of the project may disrupt nesting and migratory patterns. Birds are an important part of the food chain in the Arctic ecosystem and changes in their numbers and distribution will directly affect predators like raptors and foxes that rely on them as a readily available source of food. It is against the law to disturb or destroy an active migratory bird's nest (Migratory Bird Convention Act and regulations).

2.13.2 ENVIRONMENTAL PROTECTION MEASURES

The following measures will be implemented to minimize disturbance to birds and bird nests:


- Project Personnel are not permitted to hunt birds.
- Inspections of each work area for nests will be conducted prior to commencement of project activity.
- On-ground inspections will be conducted for bird nest and eggs of each area prior to equipment placement or project activity. Active nest sites will be identified through observation of high densities of birds, nests, or birds exhibiting territorial behaviour indicating a nearby nest. Active nests must not be destroyed or disturbed.
- The inspections will be conducted based on method described in Appendix C of the EPP - Mary River Active Migratory Bird Surveys Protocol.
- Select new equipment placement location, at least 500 m from identified active nest sites, or as otherwise identified in the Mary River Terrestrial Environment Mitigation and Monitoring Plan.
- Precaution will be taken to avoid disrupting nest sites, if these are discovered.
- Songbirds, shorebirds, loons and waterfowl — If nests of these birds are found then drills, pumps and waterlines should be placed at least 500 metres from these nest sites and precaution should be taken to avoid disrupting them.
- Shoreline and waterline routes will be inspected for breeding birds, nests, and post-hatch young, before waterlines for drills are placed. Project Personnel should remain more than 100 m from these nest sites at all times and time spent on the hose alignment should be minimized to reduce disturbances in areas between water source and project activities.

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 59 of 60
	Environment	Document #: BAF-PH1-830-P16-0008	

- Active raptor (falcons, hawks and owls) nests will be avoided by relocation of project activities, if possible. Where possible or practical, Project activities will be relocated at least 500 m from known active raptor nests during the breeding season, or the activity will be rescheduled to outside the breeding season (mid-April to mid-August). An individual nest protection plan will be produced by an avian biologist to direct activities within 500 m, or other appropriate distance, of the nest if it is not possible to relocate or delay the project activities.
- Bird sightings, particularly raptors or large concentrations of birds, should be recorded in the Wildlife Log (Section 3.10) at camp and reported to project biologists.
- If Species at Risk or their nests and eggs are encountered during Project activities, the primary mitigation will be avoidance. Project personnel shall establish clear zones of avoidance on the basis of the species-specific nest setback distances outlined in the Terrestrial Environment Mitigation and Monitoring Plan.
- Guy-wire deterrents will be used on communication towers established for the Project. Consideration will be given to reducing lighting when possible in areas where it may serve as an attractant to birds or other wildlife.
- Inspections of each work area for nests will be conducted prior to commencement of Project activity during the nesting season. Any nests found (or indicated nests) will be protected with a buffer zone determined by the setback distances outlined in the Terrestrial Environment Mitigation and Monitoring Plan until the young have fledged. If it is determined that observance of these setbacks is not feasible, nest-specific guidelines and procedures shall be developed to ensure the nests and their young are protected.
- Drills, pumps and waterlines should be placed at least 500 m from active bird nests and every precaution should be taken to avoid disrupting the nests. All Project Personnel must avoid active nest sites. Time spent on the hose alignment should be minimized to reduce disturbances in areas between the water source and Project activities. Active nests must not be destroyed.
- No drilling activity should take place within 500 m of an active raptor nest site during the breeding season (approximately mid-May to August); unless an individual nest protection plan has been prepared by an avian biologist in conjunction with the Baffinland Environment Department. Report all active nest sites to the Environmental Department.
- Whenever practical and not causing a human safety issue, a stop work policy shall be implemented when wildlife in the area may be endangered (at risk of immediate injury or death) by work being conducted.

2.13.3 FORMS


- Baffinland EPP – Wildlife Log (Section 3.10)

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 60 of 61
	Environment	Document #: BAF-PH1-830-P16-0008	

- Baffinland – Active Migratory Bird Nest Search Form (Section 3.11)

2.13.4 RELATED DOCUMENTS

- Baffinland –Terrestrial Environment Mitigation and Monitoring Plan (BAF-PH1-830-P16-0027)
- Baffinland - Active Migratory Bird Surveys Protocol (Appendix C)

	Environmental Protection Plan	Issue Date: <u>May 1, 2019</u> August 30, 2016 Revision: <u>1</u> For review purposes only	Page 61 of 62
	Environment	Document #: BAF-PH1-830-P16-0008	

2.14 SOLID WASTE MANAGEMENT

SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION #	REVISION DATE
2.14	Solid Waste Management	F	May 10, 2016

2.14.1 ENVIRONMENTAL CONCERN

Solid wastes are non-liquid, non-soluble materials including domestic garbage, food wastes, construction debris, commercial refuse, non-combustible and non-hazardous materials. Solid waste materials at site will be re-used and recycled wherever possible and feasible. Where it is not possible or feasible, the two main methods of solid waste treatment and/or disposal for the Project lifecycle will be incineration and landfilling. Solid waste, if not properly disposed of, may cause health and safety concerns to Project Personnel, attract wildlife, and could impair the aesthetics of the Project Areas. If unapproved wastes (i.e. hazardous or organic wastes) are placed in the landfill, poor quality landfill leachate may be generated and potentially affect nearby watercourses. This could also lead to attracting wildlife and increase wildlife interactions.


2.14.2 INCINERATION

Domestic wastes, including, that cannot feasibly be re-used or recycled, is incinerated at Project Sites. Combustible non-hazardous wastes (i.e., food scraps, oily rags, paper and small plastics, etc.) generated at Project sites is incinerated to minimize the negative impacts of attraction vectors to wildlife. Incinerator ash generated is analyzed and placed in the Mine Site Landfill after ensuring the ash meets regulatory requirements¹. Waste oil and waste fuel may be burned when possible in the incinerator as a secondary source of fuel.

2.14.3 OPEN BURNING

Untreated, clean wood waste products including lumber, timber, and pallets as well as paper and cardboard packaging that cannot feasibly be re-used or recycled will be burned onsite at approved open-burn locations at Milne Port and Mary River. Any treated and/or painted waste wood products, including plywood or particle board, is not permitted for opening burning. Open burning shall strictly be operated in an open top sea container at an approved open-burning location as per the requirements provided in Baffinland's Open Burning of Untreated Wood, Cardboard and Paper Products Procedure (BAF-PH1-300-PRO-0001). Ash generated from open-burning will be analyzed and placed in the Mine Site Landfill after ensuring the ash meets regulatory requirements.

¹ Outlined in the Environmental Guidelines for Industrial Waste Discharges into Municipal Solid Waste and Sewage Treatment Facilities provided by the Department of Environment of the Government of Nunavut.


	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 62 of 63
	Environment	Document #: BAF-PH1-830-P16-0008	

2.14.4 INERT WASTE LANDFILL

Inert waste generated by Project activities will be disposed of as per the requirements provided in Baffinland's Landfill Maintenance and Operation Manual (BAF-PH1-320-0004). The Mary River Landfill Facility ~~is~~^s used for disposal of inert, non-hazardous, bulky waste with little to no salvage value. This includes scrap metal, ash, rubber, concrete, plastics, and treated wood (including manufactured wood such as particle board and plywood). Landfill disposal of organic and hazardous wastes is prohibited.

2.14.5 ENVIRONMENTAL PROTECTION MEASURES

- Solid waste generated onsite will be segregated following Baffinland's Waste Management Plan (BAF-PH1-830-P16-0028). Waste streams generated at Project Sites are brought for incineration, disposed of at the Mary River Landfill Facility, approved open-burn locations, or backhauled offsite for proper disposal at a licenced waste facility (Section 2.16 – Hazardous Material and Hazardous Waste Management). Inert wastes such as scrap metal, discarded machinery parts, kegs, concrete, building materials, wood, rubber, and bulky plastics will be landfilled.
- Food wastes, packaging and paper will be incinerated on site. Kitchen grease will be [incinerated or](#) shipped south for disposal.
- Untreated, clean wood waste products including lumber, timber, and pallets as well as paper and cardboard packaging that cannot feasibly be re-used or recycled will be burned onsite at an approved open-burn location at either Milne Port or the Mary River Mine Site.
- All wildlife attracting waste (i.e., food scraps, human waste) will be stored in sealed animal proof containers and incinerated as soon as practicable.
- All waste backhauled offsite will be manifested using the Off-Site Waste Disposal Log (Section 3.12) for tracking purposes (Section 2.16 – Hazardous Material and Hazardous Waste Management)
- Sewage sludge generated at the sewage treatment plants will be dewatered and incinerated onsite.
- Waste accumulated on site prior to disposal will be confined so that it does not pose health or environmental hazards.
- Time lapse between collection and disposal shall be minimized to the extent practical.
- All combustible waste and debris will be stored and covered until disposal.
- Additional training will be provided to the kitchen and accommodations staff on sorting camp domestic wastes.
- All Project Personnel are responsible for daily clean-up of the area in which their work activities are being conducted.


	Environmental Protection Plan	Issue Date: May 1, 2019 <u>August 30, 2016</u> Revision: 1 <u>For review purposes only</u>	Page 63 of 64
	Environment	Document #: BAF-PH1-830-P16-0008	

2.14.6 FORMS

Baffinland EPP - Offsite Waste Disposal Log (Section 3.12)

2.14.7 RELATED DOCUMENTS

- Baffinland EPP – Hazardous Material and Hazardous Waste Management (Section 2.16)
- Baffinland – Waste Management Plan (BAF-PH1-830-P16-0028)
- Baffinland – Environmental Standard – Waste Sorting Guidelines (BAF-PH1-830-P25-0001)
- Baffinland - Open Burning of Untreated Wood, Cardboard and Paper Products Procedure (BAF-PH1-300-PRO-0001)
- GN - Industrial Waste Discharges into Municipal Solid Waste and Sewage Treatment Facilities

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 64 of 65
	Environment	Document #: BAF-PH1-830-P16-0008	

2.15 WASTEWATER TREATMENT

SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION #	REVISION DATE
2.15	Sewage Treatment	H	May 10, 2016

2.15.1 ENVIRONMENTAL CONCERN

Wastewater, such as sewage, grey water, and oily (contaminated) water will be generated throughout the lifecycle of the Project.


The quantity of treated effluent discharged from the Project Waste Water Treatment Plants (WWTP) and Oily Water Treatments Systems (OWTS) will be monitored and recorded using inline flow monitors. To fulfill the requirements of Baffinland's Type A Water Licence (as amended), routine water quality sampling of treatment effluent is completed at Project WWTPs by an accredited laboratory to confirm that effluent quality meets applicable discharge criteria and is acceptable for release into the receiving environment. Similarly, treated effluent from the Project's Oily Water Treatment Systems is adequately monitored when in operation using an accredited laboratory and by Baffinland's internal environment laboratory.

Uncontrolled or untreated releases of wastewater to the environment may impact drinking water, aquatic resources, wildlife and human health and should be reported immediately to the Environment Department (see Section 2.33 - Spill Control Measures and Reporting).

2.15.2 ENVIRONMENTAL PROTECTION MEASURES

The following measures will be implemented to minimize the potential for accidental releases of wastewater on site:

- Operation of Project WWTPs and OWTSs is conducted in accordance with Baffinland's Type A Licence, in conjunction with Baffinland's Freshwater Supply, Sewage and Wastewater Management Plan (BAF-PH1-830-P16-0010).
- Raw wastewater and final effluent quality will be sampled and tested according to the requirements of Baffinland's Type A Water Licence.
- All issues and/or concerns with Project WWTPs or OWTSs (i.e., improper operation, pipeline rupture, system breakdown, etc.), must be reported immediately to the Site Services and Environment Department.
- In the event of an accidental release of wastewater into the environment (i.e., pipeline rupture, etc.), immediate action is required to ensure that the release is contained and prevented from reaching any water body. Refer to Baffinland's Emergency Response Plan (BAF-PH1-840-P16-0002) and Spill Contingency Plan (BAF-PH1-830-P16-0036) for additional guidance. All sewage spills must be

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 65 of 66
	Environment	Document #: BAF-PH1-830-P16-0008	

reported immediately to the Environment Department. For more information on spill reporting, see Operational Environment Standard: Spill Control Measures and Reporting (Section 2.33).


- Quantity of sewage treated will be documented continuously using in-line flow or vacuum truck counts. Vacuum truck counts will be tracked using the Wastewater Log (Section 3.13).
- Quantity of sludge generated by the Projects STPs will be recorded daily by the STP operators.
- Data will be reported as required by Baffinland's Water Type A Licence and other relevant approvals.
- The sludge generated by the Project WWTPs is dewatered using a filter press and incinerated on site. Sludge will be stored in an animal proof secure area until picked up for disposal.
- Conserve water use to reduce the amount of wastewater generated.
- Treated wastewater will only be released into the receiving environment at approved locations at both the Milne Port and the Mary River Mine Site. All wastewater discharges are monitored to ensure all discharged effluent meets the regulatory requirements outlined in Baffinland's Type A Water Licence.

2.15.3 FORMS

- Baffinland – Wastewater Log (Section 3.13)

2.15.4 RELATED DOCUMENTS

- Baffinland EPP – Spill Control Measures and Reporting (Section 2.33)
- Baffinland – Fresh Water Supply, Sewage and Wastewater Management Plan (BAF-PH1-830-P16-0010)
- NWB – Type A Water Licence (2AM-MRY1325 Amendment No. 1)
- Baffinland - Emergency Response Plan (BAF-PH1-840-P16-0002)
- Baffinland - Spill Contingency Plan (BAF-PH1-830-P16-0036)

	Environmental Protection Plan	Issue Date: <u>May 1, 2019</u> August 30, 2016 Revision: 1 <u>For review purposes only</u>	Page 66 of 67
	Environment	Document #: BAF-PH1-830-P16-0008	

2.16 HAZARDOUS MATERIAL AND HAZARDOUS WASTE MANAGEMENT

SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION #	REVISION DATE
2.16	Hazardous Material & Hazardous Waste Management	F	May 10, 2016

2.16.1 ENVIRONMENTAL CONCERN


Hazardous materials (other than fuels) used throughout the lifecycle of the Project include; oils, greases, antifreeze, calcium chloride salt, ammonium nitrate, lead acid batteries, cleaners and other chemicals. Where the generation of the hazardous waste cannot be prevented, its management aims to prevent ~~waste from resulting on a potential negative~~ potential negative effects to the health and safety of Project Personnel and the environment.

Exposure to hazardous materials resulting from spills, leaks or releases cause potential human safety and health concerns. For more information refer to Baffinland's Hazardous Materials and Hazardous Waste Management Plan (BAF-PH1-830-P16-0011).

2.16.2 ENVIRONMENTAL PROTECTION MEASURES

Effective implementation of the following controls is required to ensure that hazardous materials and hazardous wastes are properly managed in order to minimize the potential for accidental releases to the environment:

- Hazardous materials and hazardous waste will be handled in accordance with Baffinland's Hazardous Materials and Hazardous Waste Management Plan ~~EPP~~ and will be stored within designated lined and contained areas or within shipping containers at the laydown area.
- Storage containers will be leak-proof and have content names and labels clearly visible.
- All drums shall be marked with the name Baffinland Iron Mines Corporation.
- Hazardous materials arriving by sealift will be temporarily stored in their original sea containers at laydown locations at Milne Port until transported to their final destination.
- Lubricating oils and antifreeze will be dispensed from drums or cubes using either fitted taps or pumps and will employ drip trays.
- Regular visual inspection for leaks, drips or indications of loss will be conducted at all storage areas for evidence of accidental releases and verification that wastes are properly labelled and stored.
- Waste storage sites will be monitored and sampled in accordance with Baffinland's Water Licences.
- All chemical spills must reported immediately to the Environment Department. The Emergency Response Plan and Spill Contingency Plan may be implemented, depending on the nature of the spill.

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 67 of 68
	Environment	Document #: BAF-PH1-830-P16-0008	


- Cleaning materials (i.e., rags, gloves, etc.) will be properly wrapped in sealed plastic bags and will be directed to disposal by incineration.
- All hazardous waste shall be clearly labelled and will not be combined with other solid non-hazardous waste.
- Smoking within 10 m of any hazardous waste storage location is prohibited.
- Baffinland shall itemize and maintain a tracking manifest for all hazardous materials to be used on-site. Environmental personnel shall conduct periodic inspections and audits to confirm the tracking manifest is up to date and accurate. Baffinland Departments and Contractors are responsible for maintaining the current ~~Material~~ Safety Data Sheets (~~M~~SDS) on-site for all hazardous materials pertaining to their activities.
- All hazardous material spills shall be reported to the Environment Department immediately and documented by submitting the necessary documentation within 12 hours of the spill using the Baffinland Incident Investigation Form and the NT-NU Spill Report Form (Section 3.6).
- All biological hazardous wastes generated at the medical clinic and first aid stations will be packaged, labeled and transported offsite for disposal at an appropriate licenced facility.
- Transportation and packaging of hazardous waste offsite shall be coordinated and supervised by fully-trained and qualified Project personnel or an appropriately licenced Contractor.

2.16.3 FORMS

- Baffinland – NT-NU Spill Report Form (Section 3.6)
- Baffinland – Baffinland Incident Investigation Form (BAF-PH1-810-FOR-0005)

2.16.4 RELATED DOCUMENTS

- Baffinland – Waste Management Plan (BAF-PH1-830-P16-0028)
- Baffinland – Hazardous Materials and Hazardous Waste Management Plan (BAF-PH1-830-P16-0011)
- Baffinland – Waste Sorting Guidelines (BAF-PH1-830-P25-0001)
- Baffinland - Spill Contingency Plan (BAF-PH1-830-P16-0036)
- Baffinland - Exploration Spill Contingency Plan (BAF-PH1-830-P16-0037)
- Baffinland - Emergency Response Plan (BAF-PH1-830-P16-0007)

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 68 of 69
	Environment	Document #: BAF-PH1-830-P16-0008	

2.17 ROAD CONSTRUCTION AND BORROW DEVELOPMENT

SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION #	REVISION DATE
2.17	Road Construction and Borrow Development	G	May 10, 2016

2.17.1 ENVIRONMENTAL CONCERN


Excavations disturb the ground surface and any vegetative cover that stabilizes the ground and reduces the potential for erosion. The excavation of sand and gravel from borrow areas, as well as the cut and fill technique that will occur during road construction throughout the lifecycle of the Project exposes soil, making it vulnerable to erosion.

These activities result in changes to the thermal regime of the ground (active layer and permafrost), as a new active layer is created. Modification to the thermal regime may induce melting of any ground ice present, resulting in thaw settlement and depressions caused by these settlements leading to erosion and possibly ponding of water. [These activities may also change the hydrologic drainage patterns in the area as a result of water ponding.](#)

2.17.2 ENVIRONMENTAL PROTECTION MEASURES

The ground surface will re-establish thermal equilibrium and will be suitable for re-colonization by natural vegetation over time. The following measures will be implemented to enhance this re-establishment of thermal equilibrium and minimize the effects of erosion, sedimentation and water ponding:

- Cut and fill areas will be stabilized by constructing gentle slopes less prone to erosion.
- Cut and fill areas are expected to be relatively small in horizontal and vertical extent. The side slopes of the borrow pits will be between 1H: 1V to 2H: 1V, slightly gentler than the slopes in the natural condition to reduce erosion.
- At low lying areas where roadbed fill is [in on](#) the order of 1 m and the permafrost can be expected to rise to a meaningful degree, swales or culverts will be installed as part of road maintenance to prevent the ponding of water.
- At closure, swales will be left in place, or alternatively, the road bed will be breached to allow drainage.
- Borrow activities will occur only at approved locations and will be concentrated to limit the area of disturbance. Borrow pits will be located 31 metres away from the High Water Mark of the nearest water body or stream.
- Thawed layer removal will be done sequentially.
- Areas of unexpected settlement will be filled to re-establish the natural contours and eliminate ponding of water.

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 69 of 70
	Environment	Document #: BAF-PH1-830-P16-0008	


- Regular inspection of borrow locations will be completed and unstable slopes re-graded to eliminate depressions and re-establish natural drainage patterns.

2.17.3 FORMS

None

2.17.4 RELATED DOCUMENTS

- Baffinland EPP - Sediment and Erosion Control (Section 2.9)
- Baffinland EPP – Excavations and Foundations (Section 2.27)
- Baffinland – Surface Water and Aquatic Ecosystem Management Plan (BAF-PH1-830-P16-0026)
- Baffinland – Roads Management Plan (BAF-PH1-830-P16-0023)
- Baffinland – Borrow Pit and Quarry Management Plan (BAF-PH1-830-P16-0004)

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 70 of 71
	Environment	Document #: BAF-PH1-830-P16-0008	

2.18 TOTE ROAD WATERCOURSE CROSSINGS INSTALLATION

SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION #	REVISION DATE
2.18	Tote Road Watercourse Crossings	G	July 15, 2014

Three major crossing types have been historically developed on the Tote Road as follows:

- Conventional single or multiple culverts crossings designed to pass select design flows.
- Culvert crossings (single or multiple) with an additional swale to accommodate increased flows during flood conditions
- Steel frame bridges (which may include culverts and/or swales).

2.18.1 ENVIRONMENTAL CONCERNS


Watercourse crossing installation has the potential to impact fisheries resources through the:

- Alteration of fish habitat or blockage of fish passage.
- Accidental releases of deleterious substances (i.e., fuel spills, sediment).

The construction of watercourse crossings has the potential to negatively affect fish and fish habitat from the construction of the crossing structures or the post-construction influence of the completed structures on fish habitat. Elevated levels of suspended sediment are the primary change in water quality that could result from work on or around water. Construction activities typically result in short-term effects, while long term effects can arise through erosion of ditches and slopes if not mitigated. Sediment sources related to construction activities include equipment crossings, excavation, blasting, and installation of bank protection measures (riprap), erosion from ditches and steep slopes, erosion from exposed areas on the right-of-way, and increased bed scour or bank erosion due to changes in downstream flow patterns.

There are four main groups of crossings with respect to fish habitat and the environmental protection measures required:

- Crossings with no fish habitat.
- Small crossings with fish habitat, subject to the conditions of a DFO Letter of Advice (listed in Table 2.18-1).
- Crossings with fish habitat, subject to an authorization under Section 35(2) of the Fisheries Act (listed in Table 2.18-2).
- Fish habitat compensation sites – crossings where remedial work has be carried out to improve conditions for fish and expand potential fish habitat, as agreed upon as a condition of the above fisheries authorization


	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 71 of 72
	Environment	Document #: BAF-PH1-830-P16-0008	

There are basic environmental protection measures that apply to all groups of crossings, and additional measures that apply to the crossings subject to the fisheries authorization.

2.18.2 ENVIRONMENTAL PROTECTION MEASURES

The following measures will be implemented to minimize the potential impacts of stream crossing and installations:

- Culverts will be installed in accordance with approved plans.
- Work should be conducted during low flow conditions – avoid conducting work during large precipitation/runoff events.
- Culverts will be installed at the same slope as the existing stream, where feasible.
- In culverts on steep slopes, high velocities may result in the movements of rocks inside the culvert. At these locations, baffles, baffle inserts, or weirs may be installed to assist in keeping rocks inside the culvert, maintain and increase roughness in order to reduce velocities, and provide additional resting locations for fish as they move through the culvert.
- Culvert lengths will be minimized.
- If a culvert is to exceed 50 m, methods to provide light inside the culvert will be examined and considered to prevent it being a barrier to fish passage due to darkness.
- Fish passage potential in culverts will be determined in consideration of culvert velocity compared to the existing watercourse, and this information can be used to reassess design velocities under the proposed conditions with the culvert installed.
- Rocks and boulders may be placed inside culverts where necessary to mitigate channelization of flows and conveyance by reducing velocities, increasing flow depth, and providing resting locations for fish. Boulders may be bolted into place where necessary.
- Sediment and erosion control measures shall be implemented prior to work and shall be left in place and maintained until all disturbed areas have been stabilized. For more information on sediment and erosion control measures see Operational Environment Standard: Sediment and Erosion Control (Section 2.9)
- Any stockpiled materials shall be stored and stabilized 31 metres away from the High Water Mark of any water body, unless for immediate use.
- All materials and equipment shall be operated and stored in a manner that prevents any deleterious substance (e.g. petroleum products, silt, debris, etc.) from entering the water. This includes checking that equipment is free of fluid leaks, and that grease and other debris is wiped or washed clean from the equipment, before entering the water.

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 72 of 73
	Environment	Document #: BAF-PH1-830-P16-0008	

- Re-fuelling and equipment maintenance is to be conducted 31 metres away from the High Water Mark of any water body.
- Install crossings at right angles to the watercourse so that the original direction of stream flow is not significantly altered.
- Minimize in-water work (get-in and get-out quickly).
- Water crossings will be backfilled with substrate (fill) material that is clean, competent, and consistent with the existing substrate size and texture found within the watercourse and will remain in/under the crossing.

2.18.3 ADDITIONAL ENVIRONMENTAL PROTECTION MEASURES - CROSSINGS SUBJECT TO "LETTER OF ADVICE"

- Water depth within the water crossing should be not be less than 20 cm or the same depth as the natural channel, especially during low flows.
- All disturbed areas shall be stabilized immediately upon completion of work and restored to a pre-disturbed state or better.

2.18.4 ADDITIONAL ENVIRONMENTAL PROTECTION MEASURES - CROSSINGS SUBJECT TO FISHERIES AUTHORIZATION AND FISH HABITAT COMPENSATION SITES

- An environmental inspector shall be on on-site to assess the crossings prior to the onset of construction to confirm the absence or presence of spawning sites at least 20 metres upstream or downstream of the crossing location, and whether spawning Arctic char are present in the vicinity (only applies to Table 2.18-2 crossings)
- For all crossings where fish may be present (Table 2.18-1, Table 2.18-2 and compensation sites), an environmental inspector shall be present to monitor construction activities and document turbidity levels upstream and downstream of the crossing under construction using the Turbidity Monitoring Data Form (Section 3.6) and the Watercourse Crossing Data Monitoring Form (Section 3.5). A qualified biologist or environmental inspector shall be on-site during all in-water construction, compensation and restoration works to ensure implementation of the designs, as intended in the Plan, and conditions of the fisheries authorization are being met.
- Construct new crossings at the existing crossing sites whenever practicable.
- If machinery is required to bring material or equipment to the opposite side of the watercourse, then it shall be restricted to a onetime event (over and back) and only if no other existing crossing can be used. If the stream bed and banks are highly erodible (e.g., dominated by organic materials and silts) and erosion and degradation is likely to occur as a result of equipment crossing, then a temporary crossing structure or other practices shall be used to protect these areas.

- Machinery fording shall occur at least 20 metres upstream or downstream of location where fish and/or spawning sites are noted.

TABLE 2.18-1: CROSSING [AT CURRENT OPERATIONS](#) SUBJECT TO DFO LETTER OF ADVICE

Location Code	Road Location (km)	Easting (NAD 83)	Northing (NAD 83)	Catchment Area Size Reference
BG27	86.606	547,876	7,919,342	Small
BG29	84.805	546,229	7,919,877	Small
CV001	94.728	553,782	7,914,922	Small
CV030	77.503	540,123	7,921,310	Small
CV046	66.489	531,686	7,924,265	Small
CV057	60.714	528,379	7,928,657	Small
CV058	60.523	528,322	7,928,839	Small
CV059	59.960	528,102	7,929,356	Small
CV076	53.028	526,617	7,935,335	Small
CV082	49.656	525,254	7,938,131	Small
CV086	46.300	523,746	7,940,983	Small
CV102	36.029	521,934	7,950,591	Small
CV106	33.170	521,663	7,953,392	Small
CV112	31.446	521,033	7,954,935	Small
CV113	30.656	520,747	7,955,659	Small
CV115	27.686	519,222	7,958,135	Small
CV119	24.264	517,762	7,961,153	Small
CV120	23.510	517,294	7,961,707	Small
CV125	20.448	515,296	7,963,841	Small
CV151	10.460	508,341	7,969,584	Small
CV152	10.282	508,201	7,969,684	Small
CV153	10.219	508,152	7,969,718	Small
CV154	9.570	507,620	7,970,076	Small
CV157	8.960	507,374	7,970,538	Small
CV166	6.055	505,538	7,972,370	Small
CV170	5.268	505,015	7,972,923	Small
CV176	2.637	503,834	7,975,057	Small
CV186	102.812	560,705	7,913,498	Small
CV187	103.078	560,957	7,913,414	Small
CV202	32.825	521,603	7,953,731	Small
CV203	34.150	521,782	7,952,435	Small
CV159	8.407	506,909	7,970,830	Extra Small
CV167	5.960	505,519	7,972,462	Extra Small
CV173	4.425	504,465	7,973,535	Extra Small

TABLE 2.18-2: CROSSING SUBJECT TO DFO FISHERIES AUTHORIZATION


Location Code	Road Location (km)	Easting (NAD 83)	Northing (NAD 83)
BG50	62.836	529,334	7,926,846
CV128	17.683	513,545	7,965,895
CV217	79.824	542,219	7,922,158
CV223	97.230	555,818	7,914,691
BG17	90.168	550,703	7,917,643
BG32	78.163	540,706	7,921,622
CV040	72.263	535,175	7,920,305
CV048	64.312	530,415	7,925,875
CV049	63.303	529,677	7,926,542
CV072	53.878	526,897	7,934,576
CV078	51.172	525,852	7,936,787
CV079	50.599	525,562	7,937,276
CV094	41.613	522,805	7,945,397
CV099	37.840	521,811	7,948,820
CV129	15.651	512,381	7,966,783
CV216	80.647	542,774	7,921,700
CV225	99.033	557,407	7,915,138
BG01	99.676	557,991	7,914,919
BG04	94.148	553,250	7,915,113
BG24	87.710	548,766	7,918,878
CV060	58.853	527,622	7,930,342
CV104	33.794	521,732	7,952,788
CV111	31.991	521,355	7,954,524
CV114	29.648	520,278	7,956,528
CV224	97.758	556,238	7,915,044

2.18.5 FORMS


- Baffinland EPP - Watercourse Crossing Data Monitoring Form (Section 3.14)
- Baffinland EPP - Turbidity Monitoring Data Form (Section 3.15)

2.18.6 RELATED DOCUMENTS

- DFO Authorizations [pursuant to paragraph 35\(2\)\(b\) of the Fisheries Act](#)
- Transport Canada Navigable Waters Authorizations (various)
- Baffinland EPP - Sediment and Erosion Control (Section 2.9)

	Environmental Protection Plan	Issue Date: May 1, 2019 <u>August 30, 2016</u> Revision: 1 <u>For review purposes only</u>	Page 75 of 76
	Environment	Document #: BAF-PH1-830-P16-0008	

- Baffinland EPP – Excavations and Foundations (Section 2.27)
- Baffinland – Surface Water and Aquatic Ecosystem Management Plan (BAF-PH1-830-P16-0026)
- Baffinland – Roads Management Plan (BAF-PH1-830-P16-0023)

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016	Page 76 of 77
	Environment	Revision: 1 For review purposes only	Document #: BAF-PH1-830-P16-0008

2.19 ROAD TRAFFIC MANAGEMENT

SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION #	REVISION DATE
2.19	Road Traffic Management	G	July 31, 2016

Project-related traffic will be managed to:

- Ensure smooth flow of road traffic during the Project's construction and operation.
- Ensure that adequate information is given to drivers and pedestrians in a timely manner to avoid accidents and holdups.
- Ensure assessment, monitoring and improvement of the existing road traffic site plans.


Over the life of the Project, there will be different levels of traffic flow. The peak flow periods of vehicles and equipment, and construction workers are expected to be during the day. Low flow periods will be during the night. However traffic flow will highly depend on operational planning or restrictions.

2.19.1 ENVIRONMENTAL CONCERN

- Traffic during construction and operation, if not properly managed, may cause disruption, accidents and interference in local community lifestyle.
- Project Traffic has the potential to affect traditional land based activities. i.e. hunting
- Improper traffic management may cause increased dust levels and higher environmental risks pertaining to hydrocarbon releases.

2.19.2 ENVIRONMENTAL PROTECTION MEASURES

- The Tote Road has an established right to public access, and therefore project-related traffic must share the road and be respectful of other users. Public road access and use should always be reported using the Baffinland. EPP –Human Use log (section 3.1)
- Traffic will be restricted to 50 km/hr, unless otherwise posted by dispatch. However, drivers must always drive to conditions. Traffic speed will be monitored by tracking the arrival times of trucks at the final destination, as well as by radar gun if necessary.
- Traffic shall yield the right of way to larger vehicles, giving priority to loaded haul trucks and snow plows.
- [Railway crossings will be operated and maintained in accordance with the Railway Operations and Maintenance Plan.](#)
- [Early warning signs will warn road users of an approaching railway crossing and stop sign ahead.](#)
- [A combined stop and railway crossing sign will be located on either side of the crossings.](#)

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 77 of 78
	Environment	Document #: BAF-PH1-830-P16-0008	


- [Crossing timbers will ease vehicle, ATV, and snowmobile crossing at assigned crossing locations.](#)
- [Instructional bulletins regarding the rail crossings will be posted in English and Inuktitut at Project Facilities.](#)
- Vehicles are encouraged to carry spill supplies for immediate use if required.
- Dust suppression shall be utilised on roads as required employing approved measures to reduce dust deposition on the road adjacent tundra. Baffinland - Air Quality and Noise Abatement Management Plan (BAF-PH1-830-P16-0002).
- Proper snow clearing measures will be employed to reduce snowbank drifting and facilitate proper road drainage come freshet- For more information refer to Baffinland's Site Snow Management Procedure (BAF-PH1-320-PRO-0050).
- [Signposts will be established at every kilometre along road corridors and every vehicle is responsible to call out their location and direction at required posted areas \(blind hills and corners\).](#)
- Radio towers will be established as required and with approval of the landowner. All vehicles will call out on the radio at designated areas (blinds corners, steep hills, etc.), their location, direction and type of vehicle for all other road users to hear along the Project's roadways (example: ore truck, loaded, kilometre 34, northbound).
- Community members will be encouraged not to discharge firearms within 1 km of Project roads, for the duration of the Project.
- Wildlife has the right-of-way and should be reported using the Baffinland EPP – Wildlife Log (Section 3.10). See Section 2.12 – Caribou Protection Methods for a description of what truck operators are to do when caribou are encountered within sight of the road.

2.19.3 FORMS

- Baffinland EPP – Wildlife Log (Section 3.10)

2.19.4 RELATED DOCUMENTS

- Baffinland EPP – Wildlife Log Instructions (Section 2.23)
- Baffinland - Roads Management Plan (BAF-PH1-830-P16-0023)
- Baffinland - Air Quality and Noise Abatement Management Plan (BAF-PH1-830-P16-0002)
- Baffinland - Site Snow Management Procedure (BAF-PH1-320-PRO-0050)
- QIA Commercial Lease
- [AANDC-CIRNAC](#) Quarry and Land Use Permits

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 78 of 79
	Environment	Document #: BAF-PH1-830-P16-0008	

2.20 DRILLING, BLASTING AND CRUSHING

SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION #	REVISION DATE
2.20	Drilling, Blasting and Crushing	G	May 10, 2016

Drilling and blasting will be conducted at all stages of the Project's lifecycle. Drilling and blasting activities will occur primarily at Deposit 1 at the Mary River Mine Site and rock quarries located throughout the Project Area, [including along the North Railway](#). Throughout that life of the Project various blasting methods will be utilized. This will include the use of: high explosives, pre-packaged emulsions, ammonium nitrate fuel oil (ANFO), and emulsion produced on site. Although all of these explosives contain ammonium nitrate (AN) the chance of AN escaping and contaminating the surrounding area is extremely low when using emulsions or high explosives. Ammonia is toxic to aquatic life at certain concentrations; therefore, the proper handling of explosives during blasting operations is crucial in preventing spills from having an impact to nearby watercourses.


Crushing will occur at ~~both the Mary River Mine Site and~~ Milne Port and will generate air and noise emissions (Section 2.28 – Air Quality, Noise and Vibration). Air quality and noise levels will be monitored by the Environment and Health and Safety Departments.

2.20.1 ENVIRONMENTAL PROTECTION MEASURES

- Explosives use at the site, and worker safety around mining and crushing activities, is governed by Natural Resources Canada, and is detailed in the [Company's](#) Explosives Management Plan. Project Personnel using explosives shall have all required certifications including the blasters' certificates.
- All necessary precautions shall be taken to safely handle the explosives and to minimize spillage during blasting operations.
- All spills shall be reported to the Environment Department immediately and documented by submitting a report within 12 hours of the spill to the Environment Department using the Baffinland Incident Investigation Form (BAF-PH1-810-FOR-0005) and NT-NU Spill Report Form (Section 3.6).
- All drilling and blasting activities [at quarries](#) will be in accordance with the [Company's](#) site specific Quarry Management Plans (Section 2.25 – Quarry and Borrow Pit Management) [and](#), the Explosives Management Plan.
- Environmental personnel will monitor water bodies and watercourses adjacent to blasting activities to ensure operational activities are not causing deleterious effects on aquatic resources, as stipulated in Baffinland's Type A Water Licence.

2.20.2 FORMS


- Baffinland - Baffinland Incident Investigation Form (BAF-PH1-810-FOR-0005)

	Environmental Protection Plan	Issue Date: May 1, 2019 <u>August 30, 2016</u> Revision: 1 <u>For review purposes only</u>	Page 79 of 80
	Environment	Document #: BAF-PH1-830-P16-0008	

- Baffinland EPP – NT-NU Spill Report Form (Section 3.6)

2.20.3 RELATED DOCUMENTS

- QIA Commercial Lease
- ~~AANDC~~ CIRNAC Quarry and Land Use Permits
- Baffinland – Surface Water and Aquatic Ecosystem Management Plan (BAF-PH1-830-P16-0026)
- Baffinland – Site Specific Quarry Management Plans (various)
- Baffinland – Borrow Pit and Quarry Management Plan (BAF-PH1-830-P16-0004)
- Baffinland – Roads Management Plan (BAF-PH1-830-P16-0023)
- Baffinland – Explosives Management Plan (E337697-PM407-50-126-0001)
- NWB – Type A Water Licence (2AM-MRY1325 Amend~~ed~~ mented No. 1)

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016	Page 80 of 81
	Environment	Revision: 1 For review purposes only	Document #: BAF-PH1-830-P16-0008

2.21 EXPLORATION DRILLING OPERATIONS

SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION #	REVISION DATE
2.21	Exploration Drilling Operations	E	July 15, 2014

Exploration drilling will be required to confirm, characterize and quantify new and already known deposits during the life of the Project.

2.21.1 ENVIRONMENTAL CONCERN

Environmental concerns with drilling include surface disturbances, drilling fluid and cutting disposal, impacts on dust, noise and water quality, and habitat encroachment.

All drilling muds and other additives must be approved by the Environment Department prior to being transported and used on site for any exploration drilling program. Data on drilling muds and other additives must be included as part of the Emergency Response and Spill Contingency Management Plans.

Use of water for drilling for the Project is subject to the conditions outlined in the Baffinland's Type B Water Licence (2BE-MRY1421).


2.21.2 ENVIRONMENTAL PROTECTION MEASURES

- Pre-drilling Preparation and Acceptable Drill Locations
- Prior to drill placement, investigate site drainage to determine the proper downstream placement of the collection/settling sump(s), if warranted. Note that in most situations, sumps will be required; however, in some circumstances sumps may not be practical. In these cases, approval must be obtained by the Environmental Department.
- Ensure sumps are of sufficient capacity based on a combination of proposed drill-hole length, water usage, and the potential residence time of the sumps.
- Do not construct drill sites or drill sumps within 31 metres of the Normal High Water Mark of a water body unless specific approval is obtained by Baffinland from the Nunavut Water Board.
- Ensure that the Pre-drilling Inspection Report (see Section 3.3) is completed prior to finalizing the drill site, sump locations, and silt fence locations.
- Silt fences shall be placed immediately down-gradient of drill set-ups/sumps and up-gradient of any water body or stream. The selection of silt fence locations will be based on minimizing the transport distance of drill cuttings/mud and placing silt fences in optimal locations that will be functionally effective.
- Archaeology clearance shall be obtained from the Environment Department for all exploration drill locations (Section 2.1 – Cultural Heritage and Archaeological Resources).


The information contained herein is proprietary Baffinland Iron Mines Corporation and is used solely for the purpose for which it is supplied. It shall not be disclosed in whole or in part, to any other party, without the express permission in writing by Baffinland Iron Mines Corporation.

Note: This is an UNCONTROLLED COPY. All staff members are responsible to ensure the latest revision is used.


- Conduct a wildlife inspection immediately prior to movement of the drill, involving aerial and ground survey of the new drill site. For details on drilling restrictions associated with wildlife interactions, see Operational Environment Standards: Polar Bear Encounters (Section 2.10), Fox and Wolf Encounters (Section 2.11), Caribou Protection Measures (Section 2.12) and Bird Protection Measures (Section 2.13).
- Drill Operations and Movements
- Material shall not be stored on the surface of frozen streams or lakes, including immediate banks, except materials that are for immediate use.
- Ensure that the drilling area is kept clean and tidy at all times. No littering is permitted - collect and package all waste for disposal at camp.
- Feeding of all wildlife is prohibited.
- All activities shall be conducted to minimize surface disturbance.
- Minimize overland transportation for transport of workers off of approved roads and trails to reduce the potential for ground disturbance.
- Do not use surface vehicles to move drill rigs or other equipment, without prior authorization by the Environment Department. The use of any vehicles off approved routes is prohibited.
- Do not move equipment or vehicles unless the ground surface is in a state capable of fully supporting the equipment or vehicles without rutting or gouging.
- Daily checks of active sumps will be conducted to ensure that any sump water spill-over occurs in a controlled manner. Sumps are to be constructed so that there is an overflow notch cut into the sump embankment to allow the sump water to decant from the sump in a controlled fashion.
- Silt fences will be placed downstream of the sumps as described previously and will be checked daily.
- Daily inspections for fuel/hydraulic leaks, equipment condition, sediment and erosion control, and water intakes shall be conducted prior to commencing work activities at the start and end of each work shift/day. All leaks shall be immediately repaired.
- A Daily Drill Inspection Report (Section 3.5) will be filled out by the acting Supervisor for every day of drill operation.
- All drill rigs shall be equipped with spill kits in the event of leaks and spill. All operators should be trained in spill response and be familiar the use of spill kits.
- If the bottom of the permafrost is broken through by the drill, the depth of the bottom of the permafrost and location shall be reported immediately to the Environment Department who followed by providing notification to the Nunavut Water Board.

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 82 of 83
	Environment	Document #: BAF-PH1-830-P16-0008	

- Equipment or material shall not obstruct any stream.
- Equipment storage holding areas will be located on gravel, sand or other durable land 31 metres above the ordinary High Water Mark of any water body in order to minimize impacts on surface drainage and water quality.
- Water Use, Brine and Drill Water Runoff
- Brine (calcium chloride salt mixed with water) used in exploration drilling is to be controlled to the maximum extent practicable. Drilling muds contained in drilling fluids must be settled out in sumps or by silt fences prior to entering any downstream water bodies or streams.
- Salt and water use for each drill is to be controlled by the use of brine mixing stations. The brine station operator will inspect his/her station daily and will be in continuous communication with each exploration drill. Brine conservation measures will be adopted which will include: shutting off the flow of brine to drills when brine is not required (i.e., when drills are temporarily shut down); eliminating all spillage in the vicinity of the brine stations; and minimizing to the greatest extent practicable the brine's salt concentrations.
- All water intake hoses shall be equipped with a screen of an appropriate mesh size (as approved by the DFO) to ensure that fish are not entrained ([refer to Section 2.4.2](#)). Additionally, operators will ensure the water intake hoses withdraw water at such a rate that fish do not become impinged on the screen.
- Measures shall be provided to prevent and control erosion on banks of any body of water.
- Streams cannot be used as a water source unless authorized and approved by the Nunavut Water Board.
- If water is required from a source that may be drawn down (small lake or stream), Baffinland shall submit a request for approval to the Board at least 15 days prior to withdrawing the water.
- Drill water shall be obtained from water sources(s) proximal to the drilling targets and shall not exceed a total of 250 m³ per day for all drilling activities on the Project.
- Water use will be tracked using inline water metres on intake lines and recorded on the Daily Drilling Inspection Reports (Section 3.5).
- No material shall be removed from below the ordinary High Water Mark of any water body unless authorized.
- Contain and re-circulate drill water to the fullest extent possible in order to reduce water usage. Utilize silt fences and natural depressions to divert water from running into nearby watercourses and water bodies.

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 83 of 84
	Environment	Document #: BAF-PH1-830-P16-0008	

- Separate clean water from “dirty” water streams whenever possible, (by means of hose extensions and snow berms or other means that direct and keep discharge away from the immediate area of the drill hole) to prevent migration and expansion of a “dirty” water plume.
- Work shall be performed in such a way as to ensure that materials such as sediment, fuel and/or any other hazardous material does not enter watercourses and waterbodies through the implementation of sediment control measures and proper hazardous materials management practices . In the event of a release to the environment, a spills contingency plan shall be implemented.
- The drill water supply temperature should be monitored during drilling and kept to a temperature as low as possible (but not so low as to cause an imminent risk of frozen water lines).
- To maximize drill return water recirculation, casing is to be frozen into the ground to a depth of 3 to 6 m below grade. The specific depth of casing to be frozen into each hole and length of time to allow for freezing will be specified by the acting Supervisor.
- The drill water and cuttings spillage footprint shall be minimized through the use of berms, silt fences and/or other means of containment.
- Dispose of drill water into a properly constructed sump, or a naturally occurring contained depression. Drill water shall not be released directly to a nearby water course or to the ground.
- Use portable containment sumps (bins), for drill water and cuttings where containment in the ground is impractical. The bins shall not overflow and shall be dumped by means of helicopter or pump, to the location identified for disposal of dirty drill water and cuttings.
- Drilling waste must not be allowed to spread to the surrounding land or water bodies; the footprint of any spillage must be minimized to the greatest degree practicable.
- In case of an artesian flow occurrence, drill holes shall be immediately plugged and permanently sealed to prevent induced contamination of groundwater or salinization of surface waters. Report the artesian flow occurrence within 48 hrs to the Environment Department who in turn will report the occurrence to the Nunavut Water Board.
- For on-ice drilling, returned water released must be nontoxic, and not result in an increase in Total Suspended Solids (TSS) in the immediate receiving water above the CCME guidelines for the protection of Fresh Water Aquatic Life (i.e. .10 mg/L for lakes with background levels under 100 mg/L or 10% for those above 100 mg/L).
- Drill Hole Abandonment
- Materials such as debris and/or drill cuttings shall not be left on the ice when there is potential for that material to enter a waterbody.

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 84 of 85
	Environment	Document #: BAF-PH1-830-P16-0008	

- Restore, contour and stabilize all constructed drill sumps, and other disturbed areas, to the pre-disturbed state immediately upon completion of drilling.
- Return all combustible waste and petroleum products to camp for proper management and disposal.
- Plug all drill holes upon completion, and where possible return drill cuttings at surface to the drill hole at all land-based drilling locations.
- Contour and stabilize all other disturbed areas upon completion of work and restore these areas to a pre-disturbed state.
- Upon completion of a hole in rock, the casing will be removed. If the casing cannot be removed it will be cut off to be flush with surface and backfilled.
- Remove all non-combustible garbage and debris from the land use area to an approved disposal site.
- Return all combustible waste and petroleum products to camp for proper management.
- Ensure that a Post-Drilling Inspection Report (see Section 3.5 – Drill Inspection Form - Pre-Drilling, Daily and Post Drillings) is filled out at the completion of each drill hole.
- Copies of all Pre-Drilling, Post-Drilling and Daily Drill Inspection Reports for all drill holes will be submitted to the Environment Department at the completion of each drilling program.

2.21.3 FORMS

- Baffinland EPP – Drill Inspection Forms: Pre-Drilling, Daily and Post Drilling (Section 3.5)

2.21.4 RELATED DOCUMENTS

- Baffinland EPP – Sediment and Erosion Control (Section 2.9)
- Baffinland EPP - Polar Bear Encounters (Section 2.10)
- Baffinland EPP - Fox and Wolf Encounters (Section 2.11)
- Baffinland EPP - Caribou Protection Measures (Section 2.12)
- Baffinland EPP - Bird Protection Measures (Section 2.13)
- Baffinland EPP – Exploration Drilling Operation (Section 2.21)
- Baffinland EPP – Water Sampling for On-Ice Drilling (Section 2.22)
- Baffinland – Freshwater Supply, Sewage and Wastewater Management Plan (BAF-PH1-830-P16-0010)
- Baffinland – Surface Water and Aquatic Ecosystem Management Plan (BAF-PH1-830-P16-0026)
- NWB - Type B Water Licence (2BE-MRY1421)

2.22 WATER SAMPLING FOR ON ICE DRILLING

SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION #	REVISION DATE
2.22	Water Sampling for On-Ice Drilling	D	July 15, 2014


2.22.1 ENVIRONMENTAL CONCERNS

On-ice drilling is critical for geotechnical investigations so that information for ports, bridges and other Project infrastructure may be collected for use in the infrastructure's design and engineering. Marine and lake environments are sensitive to disturbances, such as on-ice drilling. As such, overall water quality, including occurrence and concentrations of suspended solids and trace metals, must be monitored and protected. Water samples should be taken prior to on-ice drilling and after on-ice drilling to ensure appropriate water quality standards are maintained. Water sampling, for the purposes of water monitoring and detection of exceedances will ensure that the water quality is not compromised in the water bodies where on-ice drilling occurs.

2.22.2 ENVIRONMENTAL PROTECTION MEASURES

The following Measures will be followed to ensure that on-ice drilling (for both inland and marine environments) will not compromise the water quality of the underlying water body:

- A location not more than 30 m downstream (if applicable) from the proposed drill hole location will be selected for pre-drilling and post-drilling water samples.
- The pre-drilling water sample will be taken no more than four hours prior to drilling commencing at that location.
- The post-drilling water sample will be taken within four hours of the rods and casing being removed from the hole and the drill being decommissioned.
- The following methodology will be used to collect the water samples:
 1. A hole will be augured through the ice and ice cuttings will be cleared from the hole.
 2. A bailer will be used to obtain a representative water sample from the water column below the bottom of the ice.
 3. The water sample will be transferred to sample bottles.
 4. The same hole will be used to collect the pre-drilling and post-drilling water samples.
- Water samples will be tested to ensure that the total suspended solids (TSS) concentration does not increase by more than 10 mg/L for water bodies with background levels under 100 mg/L, or by more than 10% of the background level for water bodies with background levels above 100 mg/L.
- Before and after water samples will be tested in the field for TSS, pH and electrical conductivity.

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 86 of 87
	Environment	Document #: BAF-PH1-830-P16-0008	


- Before and after water samples will be submitted for laboratory testing to monitor total trace metals as determined by a standard ICP scan (to include at a minimum, the following elements: Al, Sb, Ba, Be, Cd, Cr, Co, Cu, Fe, Pb, Li, Mn, Mo, Ni, Se, Sn, Sr, Tl, Ti, U, V, Zn), total arsenic and mercury.
- Drill water and cuttings reporting to surface from on-ice drilling will be discharged into a portable containment sump and removed from the ice. Water and cuttings will be stored in a pit at least 31 m above the High Water Mark of any water body, as specified by Baffinland.
- Operational Environment Standard protection measures outlined in the Operational Environment Standard: Geotechnical Drilling Operation (Section 2.5) will also be followed in conjunction with the protection measures listed above.

2.22.3 FORMS

None

2.22.4 RELATED DOCUMENTS

- Type B Water Licence – 2BE-MRY1421
- Baffinland EPP – Geotechnical Drilling Operation (Section 2.5)

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 87 of 88
	Environment	Document #: BAF-PH1-830-P16-0008	

2.23 WILDLIFE LOG INSTRUCTIONS

SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION #	REVISION DATE
2.23	Wildlife Log Instructions	C	May 10, 2016

Baffinland is required to keep a log of all wildlife sightings at the Project Sites as a requirement of its land use permits. A system of tracked wildlife log sheets has been set up by the Environment Department to monitor wildlife sightings.


Wildlife logs will be posted at all of the Project's operating camps. The information from these sheets will be regularly collected. Completed log forms are to be returned to the Environment Department for tracking wildlife log data.

Wildlife species potentially in the Project Area include caribou, wolf, wolverine, fox, arctic hare, lemmings, polar bear, walrus, seals, whales, raptors, loons, ducks, geese, songbirds and shorebirds. All on-site Project Personnel are required to record wildlife sightings on the posted Wildlife Log (Section 3.10) with the exception of caribou sightings, which should be reported to the Environment Department directly due to sensitive nature of these sightings. Identify the animal to the best of your knowledge. If you do not know the species, record a general group name, such as 'duck' or 'small bird'. If you are unsure, indicate this, such as 'fox or wolf?' Record tracks only if they are fresh.

All polar bear and wolf sightings are required to be reported to the Environment Department immediately. Refer to OESs: Polar Bear Encounters (Section 2.10) and Fox and Wolf Encounters (Section 2.11) for additional information on polar bear and wolf sightings. Refer to Caribou Protection Measures (Section 2.12) for additional information on caribou sightings.

2.23.1 WILDLIFE LOG INSTRUCTIONS

- Record your name and the date of the observation.
- Briefly describe the location, noting any significant landmarks, road kilometre marks, water bodies or other features. This is particularly important if Site Personnel are not equipped with a GPS.
- Record the GPS coordinates if possible. Ensure coordinates are recorded in latitude/longitude or UTM NAD83.
- Record the type of animal. Identify the species, if possible, or the general type or group.
- Record the number of animals observed and the life stage (juvenile or adult), if known.
- Record observations on the behaviour of the animal. What was it doing at the time you observed it? Was it making any sound? How did it react to your presence? How far away was it? Were you walking/driving/flying?


	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 88 of 89
	Environment	Document #: BAF-PH1-830-P16-0008	

2.23.2 FORMS

- Baffinland EPP – Wildlife Log (Section 3.10)

2.23.3 RELATED DOCUMENTS

- Baffinland EPP – Polar Bear Encounters (Section 2.10)
- Baffinland EPP – Fox and Wolf Encounters (Section 2.11)
- Baffinland EPP – Caribou Protection Measures (Section 2.12)
- Baffinland EPP – Bird Protection Measures (Section 2.13)
- Baffinland –Terrestrial Environment Mitigation and Monitoring Plan (BAF-PH1-830-P16-0027)

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 89 of 90
	Environment	Document #: BAF-PH1-830-P16-0008	

2.24 BLASTING IN WATER

SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION #	REVISION DATE
2.24	Blasting in Water	C	July 15, 2014

2.24.1 ENVIRONMENTAL CONCERN


Various blasting methods will be utilized throughout the lifecycle of the Project, including the use of high explosives and pre-packaged emulsions. Although these explosives contain ammonium nitrate (AN) the chance of AN escaping and contaminating the water is low. Ammonia is toxic to aquatic life at certain concentrations, therefore the proper handling and use of explosives during blasting operations is important to minimize potential impacts on the environment.

Blasting in or near water produces shock waves and vibrations that may have a potential impact on fish and marine mammals. Because of this, it is important that the appropriate and safe vibration limits are implemented to minimize the impact to the surrounding environment.

Potential silt and sediment production resulting from blasting activities may also have negative effects on fish and fish habitat. Silt and sediment can be transported in the water which may cause turbidity and a variety of other harmful effects on fish. Some of these negative effects include; clogging and abrasion of the gills of fish and other aquatic organisms, behavioral changes such as movement and migration, decreased resistance to disease, impairment of feeding, for example, turbidity interferes with feeding for visual feeders and poor egg and fry development. These are just a few of the potential harmful effects that silt, sediment and turbidity can have on the surrounding marine and freshwater environment so ensuring that the appropriate precautions are put in place when blasting is essential.

2.24.2 ENVIRONMENTAL PROTECTION MEASURES

- Explosives use at the site, and worker safety is governed by the NWT/Nunavut Occupational Health and Safety Act and Regulations.
- Project Personnel using explosives shall have all the required certifications including the blasters' certificates.
- Modern explosive materials and blasting will reduce the risk of ammonia contaminating the water.
- Best Management Practices will be used to ensure that blasting operations in water stay within 100kPa IPC threshold set forth by the DFO Guidelines for Use of Explosives In or Near Canadian Fisheries Waters.
- The production of silt in the water from the use of explosives will be minimized using Best Management Practices, including the installation of silt fences and turbidity curtains

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 90 of 91
	Environment	Document #: BAF-PH1-830-P16-0008	


- All necessary precautions shall be taken to safely handle the explosives and to minimize spillage during blasting operations.
- Adaptive Management will be implemented in all phases of the Project in order to ensure that all the precautionary measures are in place to reduce the environmental impact of the associated activities.
- Fisheries and Oceans Canada (DFO) has produced Guidelines for the Use of Explosives in or Near Canadian Fisheries Waters to protect marine wildlife, including fish and marine mammals from underwater vibrations (DFO, 1998). Highlights of the guideline include the following:
 - No explosive is to be knowingly detonated within 500 m of any marine mammal (or no visual contact from an observer using 7 x 35 power binocular).
 - No explosive is to be detonated in or near fish habitat that produces, or is likely to produce, an instantaneous pressure change (i.e. overpressure) greater than 100 kPa in the swim bladder of a fish.
 - No explosive is to be detonated that produces, or is likely to produce, a peak particle velocity greater than 13 mm/s in a spawning bed during the period of egg incubation.
 - The guideline also presents tables of weight of explosive charge versus distance and other estimation methods to determine the potential impacts.
 - This guideline is relevant mostly for the Construction Phase of the Project with regards to port and river crossing construction.

2.24.3 FORMS

None

2.24.4 RELATED DOCUMENTS

- DFO – Guidelines for the Use of Explosives In or Near Canadian Fisheries Waters
- DFO Fisheries Authorizations (various)
- Baffinland – Explosives Management Plan (E337697-PM407-50-126-0001)

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 91 of 92
	Environment	Document #: BAF-PH1-830-P16-0008	

2.25 QUARRY AND BORROW PIT MANAGEMENT

SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION #	REVISION DATE
2.25	Quarry and Borrow Pit Management	D	May 10, 2016

A number of rock quarries and borrow pits will be required throughout the Project's life cycle. The excavated aggregate and rock from borrow pits and quarries will be stockpiled until required for further processing or construction activities. During quarry development, overburden and soil will be removed and stockpiled to expose the bedrock. Waste rock from the Mine Area will also need to be handled and stockpiled separately in accordance with Baffinland's Waste Rock Management Plan.


2.25.1 ENVIRONMENTAL CONCERN

Quarrying and borrow pit operation may be responsible for a number of environmental impacts throughout the life of the Project. Potential impacts include: soil erosion, habitat loss, dust generation, permafrost degradation and [changes to hydrologic drainage patterns \(i.e., water ponding\)](#). The water quality of waterbodies adjacent to these activities may also be impacted by means of sedimentation, fuel contamination and ammonia contamination from explosives residue.

2.25.2 ENVIRONMENTAL PROTECTION MEASURES

The following environmental protections measures for rock and aggregate excavation and management shall be implemented when developing all borrow pits and quarries:

- All Project Personnel involved in quarry and/or borrow pit development will be familiar with the conditions and environmental protection measures outlined in the ~~Company's~~ Borrow Pit and Quarry Management Plan as well as site specific Quarry Management Plans.
- The limits of the area to be excavated and the aggregate stockpile areas shall be clearly flagged/staked in the field prior to conducting any construction activities in the field.
- The borrow pits shall be designed to drain away from the face of the borrow pit to prevent water from ponding in borrow pits.
- A site specific Quarry Management Plan shall be developed for each of the Project's quarries.
- All quarry materials used shall be non-acid generating and non-metal leaching in chemical characteristics.
- When explosives are utilized Environmental personnel shall monitor the effects of explosives residue and related by-products from project-related blasting activities. In the event water licence criteria or other criteria established in the quarry or waste rock management plans are exceeded or close to being exceeded, Mine Operations personnel will work with Environment to develop and implement effective preventative and/or mitigation measures, including treatment, if necessary, to ensure that

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 92 of 93
	Environment	Document #: BAF-PH1-830-P16-0008	

the effects associated with the manufacturing, storage, transportation and use of explosives do not negatively impact the Project and surrounding areas.

- Retain as much vegetation as practicable to the maintain slope stability.
- The side slopes of the borrow pits will be 1H:1V to 2H:1V, slightly gentler than natural slopes to reduce erosion.
- Maintain natural drainage patterns to the extent practicable.
- Maintain vegetation buffer zones to protect water bodies.
- Sources of in-pit water will be diverted away from the development area by constructing ditches and berms using rip-rap, geotextile and other sedimentation control measures. Ditching will be minimized to reduce land disturbance and will be approved by the Environment Department prior to construction.
- Organics and topsoil will be salvaged and stored for use in reclamation. Overburden material may be stored for reclamation or if the material is of acceptable quality, be used for construction.
- All material stockpiles, including aggregate, rock, waste rock and overburden, will be located at least 31 metres above the ordinary High Water Mark of any water body, unless for immediate use.
- Use rip-rap to reinforce drainage channel corners and water discharge points.
- Promote natural revegetation where required to stabilize slopes.
- Adequate sediment and erosion control measures, including silt fences, turbidity curtains, settling ponds and gravel berms, will be installed around the development area to protect adjacent watercourses and waterbodies from adverse impacts such as sedimentation and elevated turbidity levels (Section 2.9 – Sediment and Erosion Control).
- Use proper fuel containment and handling techniques, and have spill kits accessible.
- Use proper explosives handling techniques to minimize waste.
- Ice-rich material will be stockpiled 31 m above the ordinary High Water Mark of any water body and in a location where melt water will not re-enter the pit or have adverse impacts on adjacent aquatic resources.


- [Dust](#) shall be controlled as per the Air Quality and Noise Abatement Management Plan

2.25.3 FORMS


None

2.25.4 RELATED DOCUMENTS

- QIA Commercial Lease

	Environmental Protection Plan	Issue Date: May 1, 2019 <u>August 30, 2016</u> Revision: 1 <u>For review purposes only</u>	Page 93 of 94
	Environment	Document #: BAF-PH1-830-P16-0008	

- [AANDC-CIRNAC](#) Quarry and Land Use Permits (various)
- Baffinland EPP – Land Disturbance (Section 2.3)
- Baffinland EPP – Sediment and Erosion Control (Section 2.9)
- Baffinland EPP – Road Construction and Borrow Pit Development (Section 2.17)
- Baffinland EPP – Drilling, Blasting and Crushing (Section 2.20)
- Baffinland – Life of Mine Waste Rock Management Plan (BAF-PH1-830-P16-0029)
- Baffinland – Borrow Pit and Quarry Management Plan (BAF-PH1-830-P16-0004)
- Baffinland – Site Specific Quarry Management Plans (various)

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 94 of 95
	Environment	Document #: BAF-PH1-830-P16-0008	

2.26 CONCRETE PRODUCTION

SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION #	REVISION DATE
2.26	Concrete Production	C	July 15, 2014

2.26.1 ENVIRONMENTAL CONCERN

As required, during construction, concrete will be mixed at batching plants located at the construction laydown areas. Cement will be shipped via sea lift and mixed with water and aggregate to make the concrete. Waste concrete will arise from off-spec mixes, residual concrete at the end of pours, and from wash down of the equipment. It is important to ensure that there are no spills of waste cement or cement wash water runoff onsite as concrete is corrosive and waste runoff can impact the surrounding environment.


Another major concern is dust formation from the production of concrete. Dust will have a significant impact on the air quality on site so it is important that all precautionary measures, as outlined in the Air Quality and Noise Abatement Management Plan, are taken to contain and reduce the potential impact of dust generation.

2.26.2 ENVIRONMENTAL PROTECTION MEASURES

- To the greatest extent practicable, concrete production shall occur within the batch plant in order to ensure the dust is contained and Best Management Practices will be implemented to minimize the production and effects of dust onsite.
- Shipping of cement to site will be done using tote bags stored in sealed sea can containers which will reduce the likelihood of any spills occurring onsite.
- A purpose built concrete wash water pond shall be used to receive all wash water from concrete related activities in order to allow for the settling of solids, decant analysis and pH adjustment as required. Wash water will be recycled back into concrete production to the fullest extent possible in order to reduce water use and the quantity of wastewater generated by concrete production. All concrete product waste shall be disposed in the concrete wash pond or at other agreed to appropriate locations that pose not risk to the receiving environment.
- Lined containment areas will be used to wash concrete delivery trucks' drums and chutes on-site in order to minimize runoff of waste wash water.
- Waste hardened concrete will be used as either fill, or disposed of at the Mary River Mine Site Landfill.


2.26.3 FORMS

None

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 95 of 96
	Environment	Document #: BAF-PH1-830-P16-0008	

2.26.4 RELATED DOCUMENTS

- Baffinland – Air Quality and Noise Abatement Management Plan (BAF-PH1-830-P16-0002)
- Baffinland - Surface Water and Aquatic Ecosystem Management Plan (BAF-PH1-830-P16-0026)
- Baffinland – Fresh Water Supply, Sewage and Wastewater Management Plan (BAF-PH1-830-P16-0010)

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 96 of 97
	Environment	Document #: BAF-PH1-830-P16-0008	

2.27 EXCAVATIONS AND FOUNDATIONS

SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION #	REVISION DATE
2.27	Excavation and Foundations	C	July 15, 2014

2.27.1 ENVIRONMENTAL CONCERN

Various activities requiring excavations and foundations will be undertaken throughout the life of the Project. Such activities include: driving pile foundations for buildings, excavating foundations for buildings and excavating abutments for bridges.

Excavations and foundations on site may have several environmental impacts that could potentially occur throughout the life of the Project. Possible environmental impacts that may occur include: loss of vegetation and wildlife habitat, effects on the stability and profile of permafrost, erosion, sedimentation, and [changes to hydrologic drainage patterns \(i.e., water ponding\)](#). ~~the ponding of water.~~


2.27.2 ENVIRONMENTAL PROTECTION PROCEDURE

Measures that will be implemented to minimize the environmental impact of excavations and foundations throughout the Project include:

- Minimize vegetation disturbance as much as possible to enhance soil stability (see Section 2.3 – Land Disturbance).
- Ensure adequate drainage and maintain natural drainage patterns.
- Locate the development in a well-drained area whenever feasible.
- Ensure excavations are properly drained and that surface water drainage is diverted away from development areas whenever feasible.
- Adequate sediment and erosion control measures, including silt fences, turbidity curtains, settling ponds and gravel berms, will be installed around the development area to protect adjacent watercourses and waterbodies from adverse impacts such as sedimentation and elevated turbidity levels (see Section 2.9 – Sediment and Erosion Control).
- For more details on work activities related to water crossings (culverts, bridges), see Operational Environment Standard: Tote Road Watercourse Crossing Installation (Section 2.18).


2.27.3 FORMS

None

	Environmental Protection Plan	Issue Date: May 1, 2019 <u>August 30, 2016</u> Revision: 1 <u>For review purposes only</u>	Page 97 of 98
	Environment	Document #: BAF-PH1-830-P16-0008	

2.27.4 RELATED DOCUMENTS

- Baffinland EPP – Land Disturbance (Section 2.3)
- Baffinland EPP – Sediment and Erosion Control (Section 2.9)
- Baffinland EPP – Tote Road Watercourse Crossing Installation (Section 2.18)
- Baffinland – Borrow Pit and Quarry Management Plan (BAF-PH1-830-P16-0004)

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 98 of 99
	Environment	Document #: BAF-PH1-830-P16-0008	

2.28 AIR QUALITY, AND NOISE AND VIBRATION

SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION #	REVISION DATE
2.28	Air Quality, Noise and Vibration	B	July 15, 2014

2.28.1 ENVIRONMENTAL CONCERN

Project related sources that may affect air quality include exhaust emissions from vehicles, aircraft, and other equipment, emissions from incinerators, and fugitive dust emissions from mining activities, borrow sources, road [and rail](#) traffic and construction activities. Construction activities have the potential to generate emissions of airborne particulates that may result in short-lived periods of elevated particulate matter (PM10 and PM2.5) concentrations. ~~Significant quantities of p~~Particulate matter during ~~these periods~~[construction activities](#) may be transported by weather conditions to accommodation areas of the Project, resulting in potential health and safety issues for Project Personnel. Dust generated from vehicles and construction activities may potentially affect the health of vegetation, wildlife, Project Personnel, ~~and local communities as well as the safety of personnel and local residents around the site.~~

Noise and vibration is generated from construction activities such as the use of machinery, diesel generators, vehicles, drilling, excavation, crushing of aggregate, blasting, etc. When no control measures have been put in place, Project Personnel working with or near noisy equipment or processes may be affected by high direct or ambient noise which could potentially result in noise induced hearing loss. Noise and vibration may also affect wildlife in areas surrounding construction activities.


Please refer to the existing Air Quality and Noise Abatement Management Plan for more information on how to address any air quality and noise abatement concerns.

2.28.2 FORMS

None

2.28.3 RELATED DOCUMENTS

- Baffinland EPP – Blasting in Water (Section 2.24)
- Baffinland - Air Quality and Noise Abatement Management Plan (BAF-PH1-830-P16-0002)

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 99 of 100
	Environment	Document #: BAF-PH1-830-P16-0008	

2.29 POST-CONSTRUCTION ACTIVITIES

SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION #	REVISION DATE
2.29	Post-Construction	B	May 10 , 2016

2.29.1 ENVIRONMENTAL CONCERN

Post-construction activities may include the re-contouring stockpiled soil and overburden, natural re-vegetation, restoring natural drainage patterns, equipment and waste removal etc., as required within the Project footprint in order to prepare for the Reclamation Phase of the Project and minimize environmental impacts.

The loss of terrestrial and aquatic habitat, erosion and slope failure, and the disturbance and/or destruction of historic resources are environmental concerns associated with the potential activities related to construction. With the proper post-construction activities in place, the physical environment shall be more readily restored and remediated to mitigate the potential impacts listed above.


Refer to the Preliminary Mine Closure and Reclamation Plan (FEIS, Appendix 10G) [and Interim Closure and Reclamation Plan \(BAF-PH1-830-P16-0012\)](#) for more information on Post-Construction Activities and progressive reclamation.

2.29.2 FORMS

None

2.29.3 RELATED DOCUMENTS

- Baffinland – Final Environmental Impact Statement – Appendix 10G
- Baffinland – Interim [ClosureAbandonment](#) and Reclamation Plan (BAF-PH1-830-P16-0012)

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 100 of 101
	Environment	Document #: BAF-PH1-830-P16-0008	

2.30 PROTECTION OF THE MARINE ENVIRONMENT AND WILDLIFE

SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION #	REVISION DATE
2.30	Protection of the Marine Environment and Wildlife	C	May 10, 2016

2.30.1 ENVIRONMENTAL CONCERN

Potential environmental impacts have been identified such as underwater and airborne noise, release of sediment into the water, and accidental introduction of hydrocarbons or other deleterious substances/materials into the marine environment. Should these potential impacts affect the marine habitat and wildlife, the appropriate protection and mitigation measures need to be implemented.

In 2015, Baffinland developed the Marine Environmental Effects Monitoring Plan (Appendix H of the Shipping and Marine Wildlife Management Plan, BAF-PH1-830-P16-0024). This plan is reviewed by the Marine Environment Working Group and submitted annually to the Nunavut Impact Review Board.

The objectives of the MEEMP are to:


- Address regulatory requirements, especially those listed in the amended NIRB Project Certificate No. 005.
- Develop a comprehensive and integrated environmental monitoring program that includes follow-up as required.
- Incorporate an ecosystem-based approach for monitoring and management of Project-related environmental effects.
- Coordinate all aspects of project-related marine environment effects monitoring.

2.30.2 FORMS

None

2.30.3 RELATED DOCUMENTS

- Baffinland - Shipping and Marine Wildlife Management Plan (BAF-PH1-830-P16-0024)

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 101 of 102
	Environment	Document #: BAF-PH1-830-P16-0008	

2.31 FRESHET MANAGEMENT

SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION #	REVISION DATE
2.31	Freshet Management	B	May 10, 2016


2.31.1 ENVIRONMENTAL CONCERN

The effective management of freshet is imperative to maintaining the usability of the Tote Road and stability of camp pad and associated infrastructure. Improper or mismanaged preparation activities can result in significant washouts of the Tote Road directly impacting Project production, scheduling as well as incur disruptions to transport and supplies to Project Sites. Also, the failure to properly prepare for, and manage freshet along the Tote ~~road~~ [Road](#) is a major risk to the Company that can potentially result in major damage to the road, loss of material and personnel movement between Project Sites, significant production losses, schedule delays, and loss of reputation/regulatory enforcement.

2.31.2 ENVIRONMENTAL PROTECTION MEASURES

The following measures must be implemented to minimize the potential risks associated with freshet:

- Only Site Personnel trained in completing culvert excavation and steaming activities are permitted to undertake the following activities.
- Culvert ends must be dug out using an excavator prior to the commencement of the melt to allow access to the ends. When digging out the culverts using the excavator, it is very important not to damage the culvert ends. The culvert ends should have rebar markers; however this activity should be undertaken with the use of a spotter. Also, if the rebar is no longer in place on one end, a metal detector should be used to locate the culvert end by the spotter.
- Culverts found to be substantially or completely blocked will need to be opened using a portable steam generator or steaming truck in order to allow for the passage of the initial melt water. It is important to monitor initial days of runoff as if the weather gets cold once melt begins ~~then there will be~~ [the possibility of refreezing of the culverts.](#)
- Once the flows begin, a dedicated monitor is required to watch for potential problem areas including upstream build-up of water, high flows, and upstream and downstream erosion and sedimentation. Should any of the above conditions be observed various measures can be adopted including the use of pumps, berms, the installation of additional overflow culverts, and the installation of riprap or geotextile. Under certain circumstances, a controlled breach of the road may also be necessary to allow upstream flows to subside and to minimize overall the damage to the road.
- Should a washout or erosion occur, all reasonable efforts need to be made to prevent the siltation of downstream water bodies. Methods of controlling the migration of deleterious materials include silt

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 102 of 103
	Environment	Document #: BAF-PH1-830-P16-0008	

fences, silt curtains, sumps and check dams, settling ponds, riprap and armoring as well as the use of flocculants.


- Preparation and management activities should follow the Tote Road Freshet management Procedure, however in the event of significant erosion or siltation, please refer to the [Surface Water and Aquatic Ecosystem Management Plan \(BAF-PH1-830-P16-0026\)](#) and the [Roads Management Plan \(BAF-PH1-830-P16-0023\)](#).

2.31.3 FORMS

None

2.31.4 RELATED DOCUMENTS

- Baffinland EPP – Sediment and Erosion Control (Section 2.9)
- [Baffinland – Surface Water and Aquatic Ecosystem Management Plan \(BAF-PH1-830-P16-0026\)](#)
- [Baffinland – Roads Management Plan \(BAF-PH1-830-P16-0023\)](#)

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 103 of 104
	Environment	Document #: BAF-PH1-830-P16-0008	

2.32 COMPLIANCE INSPECTIONS


SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION #	REVISION DATE
2.32	Compliance Inspections	B	May 10, 2016

Individual departments are responsible for maintaining a clean, safe and environmentally acceptable work area. Departments are expected to conduct and document regular inspections of their work areas and facilities to ensure the Company's commitments and expectations regarding health, safety and environment are being met or exceeded. Inspection documentation shall be made available to Environment personnel conducting periodic inspections or to external inspectors, regulators, and agencies conducting inspections under the terms and conditions of Baffinland's licences, permits, authorizations, and leases.

In addition to departmental inspections, Environmental personnel will conduct routine inspections throughout the Project site to confirm department personnel are operating in accordance with the Company's Water Licences, permits and other regulatory requirements put in place by stakeholders, land owners and government regulators. Project Personnel who are unsure about certain environmental impacts and/or necessary protection measures should consult the Environmental Protection Plan first followed by the Environment Department before proceeding with the activity under question.

While conducting inspections, departments should pay close attention to the following:

- All hazardous materials and hazardous waste should be contained in a spill tray, a lined containment berm or some other form of secondary containment.
- All waste should be segregated in accordance with the Waste Sorting Guidelines. Departments should ensure that disposal bins for each type of waste (hazardous, landfill, incinerator) are accessible and clearly labelled.
- All food waste and wildlife attractants will be disposed indoors to prevent the attraction and food conditioning of wildlife.
- All refuelling and equipment maintenance activities should employ the use of spill trays to prevent hazardous materials such as fuel, oils and greases from spilling onto the ground. See the Environmental Standard – Use of Spill Trays at Site for more details.
- All spills should be documented and reported to the Environment Department as soon as possible. Spills should be cleaned up as soon as possible after being reported, unless told otherwise by the Environment Department. For more details on spill reporting see Operational Environment Standard: Spill Control Measures and Reporting (Section 2.33).
- For a complete list of project components and items to monitor refer to Environmental Inspection Forms (Section 3.16).

	Environmental Protection Plan	Issue Date: May 1, 2019 <u>August 30, 2016</u> Revision: 1 <u>For review purposes only</u>	Page 104 of 105
	Environment	Document #: BAF-PH1-830-P16-0008	


- The schedule for conducting environmental inspections will vary from month to month and will be established by the Environmental Superintendents and Coordinators and approved by the Environmental Manager. The schedule will be developed based on a Project activity risk based approach.

2.32.1 FORMS

- Baffinland EPP - Environmental Inspection Forms (Section 3.16)

2.32.2 RELATED DOCUMENTS

- Baffinland EPP – Spill Control Measures and Reporting (Section 2.33)
- Baffinland EPP – Fuel Storage and Handling (Section 2.7)
- Baffinland EPP – Hazardous Material and Hazardous Waste Management (Section 2.16)
- Baffinland – Environmental Standard - Waste Sorting Guidelines
- Baffinland - Environmental Standard – Use of Spill Trays at Site
- Baffinland – Waste Management Plan (BAF-PH1-830-P16-0028)

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 105 of 106
	Environment	Document #: BAF-PH1-830-P16-0008	

2.33 SPILL CONTROL MEASURES AND REPORTING

SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION #	REVISION DATE
2.33	Spill Control Measures and Reporting	B	May 10, 2016

A wide range of hazardous materials will be used during the life of the Project including Jet-A, diesel, oils, greases, antifreeze, calcium chloride ~~salt~~, ammonium nitrate, lead acid batteries, cleaners and a variety of other materials. The management of hazardous materials onsite will focus on preventing the materials from causing harm to the health and safety of Project Personnel and the surrounding environment. All spills, leaks and releases of hazardous materials will be reported to the Environment Department immediately and documented by submitting the necessary documentation within 12 hours of the spill using the *Baffinland Incident Investigation Form* (BAF-PH1-810-FOR-0005) and *NT-NU Spill Report Form* (Section 3.6).

Refer to the Spill Contingency Plans and Emergency Response Plans for various response action levels based on type of hazardous product spilled, volume spilled and type of receiving environment. A brief summary of the various spill response action levels are provided below.

Emergency response action levels and response procedures for environmental (spill) emergencies are provided in Baffinland's Emergency Response Plan (ERP) (BAF-PH1-830-P16-0007) in addition to Baffinland's Spill Contingency Plan (BAF-PH1-830-P16-0036).

Baffinland has adopted a classification system that includes three levels of emergency response. Each level of emergency, based on the significance of the event, requires varying degrees of response, effort and support. With emphasis on spills and releases the three response levels are as follows:

- Level 1 (Low) – Minor accidental release of a deleterious substance with:
 - No threat to public safety; and/or
 - Negligible environmental impact to receiving environment.
- Level 2 (Medium) – Major accidental release of a deleterious substance with:
 - Some threat to public safety; and/or
 - Moderate environmental impact to receiving environment
- Level 3 (High) – Uncontrolled hazard which:
 - Jeopardizes project personnel safety: and/or
 - Significant environmental impacts to receiving environment

For spills, the level of emergency response to a spill incident is based on the substance released, quantity spilled, the receiving environment that is potentially impacted, and human health risk. The level of

response is also based on whether the location of the spill release is within engineered containment. The following matrix provides a working guideline for project personnel.

SPILL RESPONSE LEVELS				
	Level 1 (Low)	Level 2 (Medium)	Level 3 (High)	
Explosives	<100 kg	100 – 1,000 kg	>1,000 kg	in water
	<500 kg	500 – 5,000 kg	>5,000 kg	on land
Sewage	<1,000 L	1,000 – 10,000 L	>10,000 L	in water
	<10,000 L	10,000 – 100,000 L	>100,000 L	on land
Hazardous Materials*	<10 L	10 – 1,000 L	>1,000 L	in water
	<500 L	500 – 5,000 L	>5,000 L	on land
	<1,000 L	1,000 – 100,000 L	>100,000 L	in containment

*Include Fuels (Diesel/~~Jet~~A), Lubricants, Antifreeze, Hydraulic Oil, Waste Oil, Antifreeze, etc.

Emergency spill response training shall be completed in conjunction with Baffinland's ERP. Baffinland's Emergency Response lead, with support from the Environmental Manager/Superintendents, will identify Project training needs and the resources required to provide the necessary skills to personnel tasked with duties in emergency and spill response. Circumstantially, emergency spill responses often occur in parallel with emergency responses (i.e. an overturned fuel tanker accident along the Tote road not only causes imminent hazards to site personnel, but also to the surrounding environment). To facilitate efficient emergency response to all different types of emergency scenarios, project personnel on the Mine Rescue

Team ([MERT](#)) are trained to respond to Health and Safety emergencies and shall also receive sufficient training to effectively respond to accidental releases of hazardous materials.

Internal Baffinland reports are to be provided by the responsible department to the Environment Department via the Baffinland Incident Reporting System. All external reporting to outside agencies are to be provided by the Environment Department.

TABLE 2.33-1: GENERAL SPILL REPORTING AND CLEAN UP STANDARDS


Spill on Land		
Volume (L)	Required Documentation	Spill Clean up
Less than 1 litre	- Verbal or email report	Environment Department will advise if needed.
Greater than 1 litre and less than 100 litres	- Photos of Spill and Clean-up - Baffinland Incident Investigation Report - NT-NU Spill Report	Spills greater than 30 litres will have an Environmental Monitor present to advise clean-up efforts.
Greater than 100 litres	- Photos of Spill and Clean-up - Baffinland Incident Investigation Report - NT-NU Spill Report - Notification to regulators and the Spill Line	Environmental Superintendent or his/her designate will lead and advise clean-up efforts.
Spill on Water Body or Watercourse		
Volume (L)	Required Documentation	Spill Clean up
Any volume	- Photos of Spill and Clean-up - Baffinland Incident Investigation Report - NT-NU Spill Report - Notification to regulators and the Spill Line	Environmental Superintendent or his/her designate will lead and advise clean-up efforts.

2.33.1 FORMS


- Baffinland – Baffinland Incident Investigation Form (BAF-PH1-810-FOR-0005)
- Baffinland EPP - NT-NU Spill Report Form (Section 3.6)

2.33.2 RELATED DOCUMENTS

- Baffinland EPP – Hazardous Material & Hazardous Waste Management (Section 2.16)
- Baffinland - Spill Contingency Plan (BAF-PH1-830-P16-0036)

	Environmental Protection Plan	Issue Date: May 1, 2019 <u>August 30, 2016</u> Revision: 1 <u>For review purposes only</u>	Page 108 of 109
	Environment	Document #: BAF-PH1-830-P16-0008	

- Baffinland – Emergency Response Plan (BAF-PH1-830-P16-0007)
- Baffinland - Spill Contingency Plan (BAF-PH1-830-P16-0036)
- Baffinland - Exploration Spill Contingency Plan (BAF-PH1-830-P16-0037)
- Baffinland - Emergency Response Plan (BAF-PH1-830-P16-0007)
- Baffinland – Milne Port Oil Pollution Emergency Plan (BAF-PH1-830-P16-0013)

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 109 of 110
	Environment	Document #: BAF-PH1-830-P16-0008	

[2.34 RAILWAY TRAFFIC MANAGEMENT](#)


[Railway traffic management will be addressed within a Railway Operation and Maintenance Plan being prepared for the North Railway. This section of the EPP will be updated based on the content of the Railway Operation and Maintenance Plan, once available.](#)

[Project-related railway traffic will be managed to:](#)

- [Ensure efficient and orderly movement of rail traffic throughout Project operation.](#)
- [Ensure necessary information is provided to land/road users and others whose activities may occur in vicinity of the railway to ensure safety.](#)

[2.34.1 RELATED DOCUMENTS](#)

- [Baffinland – Railway Operation and Maintenance Plan \(under development\)](#)
- [Baffinland –Terrestrial Environment Mitigation and Monitoring Plan \(BAF-PH1-830-P16-0027\)](#)

	Environmental Protection Plan	Issue Date: <u>May 1, 2019</u> August 30, 2016 Revision: <u>1</u> For review purposes only	Page 110 of 111
	Environment	Document #: BAF-PH1-830-P16-0008	

[2.35 ORE DOCK CONSTRUCTION](#)

[2.35.1 ENVIRONMENTAL CONCERN](#)


[Construction of the ore dock may result in potential environmental impacts such as underwater and airborne noise, release of sediment into the water, disturbance to marine wildlife, and accidental introduction of hydrocarbons or other deleterious substances/materials into the marine environment. Should these potential impacts affect the marine habitat and wildlife, the appropriate protection and mitigation measures need to be implemented.](#)

[In 2015, Baffinland developed the Marine Environmental Effects Monitoring Plan \(Appendix H of the Shipping and Marine Wildlife Management Plan, BAF-PH1-830-P16-0024\). This plan is reviewed by the Marine Environment Working Group and submitted annually to the Nunavut Impact Review Board.](#)

[2.35.2 ENVIRONMENTAL PROTECTION MEASURES](#)

- [• An Ore Dock Construction Environmental Plan will be prepared to meet Fisheries Act Authorization requirements and implemented during construction of marine facilities in Milne Inlet. The environmental protection measures listed below will be updated based on the content of the Ore Dock Construction Environmental Plan, once available.](#)
- [• Construction activities will be managed through development of the Ore Dock Construction Environmental Management Plan, outlining specific procedures to avoid or reduce effects on the marine environment. Proposed mitigation measures during construction will include the installation of silt curtains around in-water works to minimize disturbance to the surrounding marine environment, turbidity monitoring and underwater noise monitoring during pile installation and dredging, and environmental monitoring with regular inspection audits to verify effectiveness of mitigation measures and compliance of Project activities with existing permits and authorizations.](#)
- [• Silt curtains will be installed around localized construction areas during the ice break-up period and around the full perimeter of construction including removed sediment disposal area during the open-water season.](#)
- [• Silt curtains will be installed prior to any in-water work in order to encapsulate the entire construction footprint and to reduce disturbance to the marine environment in the surrounding area.](#)
- [• Construction of concrete components of the dock will consist of installation of prefabricated concrete elements whenever possible. If in-situ concrete production is required, works will be conducted in the way to avoid contact of cement and uncured concrete with surrounding water.](#)
- [• The majority of construction work, particularly in shallow water \(e.g., access causeway\), will take place in winter as land-fast ice is formed. It is expected that, as construction gradually moves offshore, ice will thicken and become grounded. Therefore, ice surrounding construction areas will act as a barrier limiting particulate deposition and spills in surrounding water.](#)

- To reduce disturbance to the marine environment, the ore dock components will be constructed sequentially, moving from onshore to offshore; the causeway will be constructed in small sections, placing protective layers and armoring immediately after core material is placed to minimize erosion.
- Backfilling of the berth will only occur after a sufficient length of quay is installed so the fill remains within the structure footprint and no material is dispersed.
- Machine operation in water will be reduced, e.g., piling and filling equipment will operate on the constructed sections of the ore dock and will not enter the water.
- Use of a suction pump for localized removal of soft sediment layer will reduce dispersal of re-suspended sediment in water.
- Disposal of removed sediment will be conducted in accordance in a way to minimize effects on water and sediment quality. The material will be removed using a suction pump, which will reduce dispersal of re-suspended sediment in water.
- Concurrent pile driving activities will be minimized when practicable (e.g., avoiding multiple pile driving activities at the same time).
- Vibratory pile driving methods will be preferred over impact pile driving.
- Impact pile driving will be scheduled when practical to avoid sensitive fish periods such as fish spawning and migratory periods.
- During in water construction, a silt curtain will be installed in order to isolate the footprint of the proposed ore dock. The curtain will be designed and procured in sections which relate to the water depth in order to remain buoyant and extend to the ocean floor with sufficient slack.
- Prior to construction work within the silt curtain area, efforts will be made to salvage fish and release them alive outside of the work area. The silt curtain will also serve as a deterrent to fish re-entering the isolated work area.
- The proposed ore dock will be constructed in succession to limit disturbance to the natural marine environment, with a focus on in-water activities and producing an effective structure for long term, low maintenance operation.
- The dock face will be oriented parallel to the existing seabed contours to minimize dredging activities.
- The proposed ore dock will be constructed during the ice-covered season, when ringed seal would be the only marine mammal species present in southern Milne Inlet.
- A ramp-up procedure consists of initial activation of the equipment using the lowest energy source / pulse and gradually increasing the intensity of the sound until it reaches the required intensity, thus allowing time and incentive for marine mammals to leave the immediate zone of potential injury before the pile driver is operating at full power.

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 112 of 113
	Environment	Document #: BAF-PH1-830-P16-0008	

- [Installation of a bubble curtain around the wetted pile to dampen sound transmission through water during active pile driving.](#)
- [During all pile driving activities, marine mammal monitoring will be undertaken by a qualified and experienced Marine Mammal Observer \(MMO\), with all sightings communicated to the piling contractor.](#)
- [Implementation of a Marine Mammal Exclusion Zone – defined as the zone within which MM may be potentially exposed to sound levels above the injury threshold criteria \(180 dB re 1 µPa SPLrms for cetaceans and 190 dB re 1 µPa SPLrms for pinnipeds\). The occurrence of a marine mammal within the exclusion zone will trigger specific mitigation actions \(e.g., shut-downs\) such to avoid potential for physical injury to animals from pile driving noise.](#)
- [Shut-down procedures –pile driving will be temporarily suspended when a marine mammal enters within the exclusion zone until which time it moves outside the safety zone.](#)
- [Implementation of a 30 minute pre-operational \(pre-ops\) search for marine mammals prior to start-up of pile driving. This would consist of a visual scan of the water by the MMO to determine that no marine mammals are present within the exclusion zone.](#)
- [The MMO will periodically verify underwater sound levels in the field using a hydrophone and a real-time sound monitor to confirm that sound levels at the modeled exclusion zone radius are below the established injury thresholds for marine mammals. If sound levels are shown to exceed the injury thresholds at the exclusion zone radius, the exclusion zone boundary will be adjusted accordingly.](#)
- [The release of deleterious substances in the marine environment can adversely affect marine mammals and fish found in the Project area. Water quality monitoring needs will be set out in the Ore Dock Construction Environmental Plan and will include:](#)
 - [In situ monitoring of turbidity during in-water and nearshore Works, and specifically during pile driving and dredging operations \(as needed\).](#)
 - [In situ monitoring of pH levels during concrete pouring \(as needed\).](#)
 - [Daily in situ monitoring turbidity monitoring, including background turbidity measurements.](#)
 - [Daily visual inspection of the works areas and surrounding water for visual turbidity events.](#)

2.35.3 FORMS


[None.](#)

2.35.4 RELATED DOCUMENTS

- [Construction Environmental Management Plan \(CEMP\) for the New Milne Ore Dock - Phase 2 Proposal](#)
- [Baffinland - Shipping and Marine Wildlife Management Plan \(BAF-PH1-830-P16-0024\)](#)

The information contained herein is proprietary Baffinland Iron Mines Corporation and is used solely for the purpose for which it is supplied. It shall not be disclosed in whole or in part, to any other party, without the express permission in writing by Baffinland Iron Mines Corporation.

Note: This is an UNCONTROLLED COPY. All staff members are responsible to ensure the latest revision is used.

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 113 of 114
	Environment	Document #: BAF-PH1-830-P16-0008	

3 DOCUMENTATION LOGS AND FORMS


SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION #	REVISION DATE
3.0	Documentation Logs and Forms	E	August 6, 2016

DOCUMENTATION PROCEDURES

A key aspect of the EPP is effective record-keeping. The following logs and forms are to be used to record key information:

- Cultural Heritage Chance Find Discovery Form (Section 3.1).
- Human Use Log (Section 3.2)
- Mary River Visitor Access Routes (Section 3.3)
- Water Collection Log (Section 3.4)
- Drill Inspection Forms (Section 3.5)
- NT-NU Spill Report Form (Section 3.6)
- Daily Tank Farm Inspection Checklist (Section 3.7).
- Fuel Tank Dipping Form (Section 3.8)
- Polar Bear Readiness Audit Form (Section 3.9)
- Wildlife Log (Section 3.10)
- Active Migratory Bird Nest Search Form (Section 3.11)
- Off-site Waste Disposal Log (Section 3.12)
- Wastewater Log (Section 3.13)
- Watercourse Crossing Monitoring Data Form (Section 3.14)
- Turbidity Monitoring Data Form (Section 3.15)
- Environmental Inspection Forms (Section 3.16)

The record keeping forms are described further in their respective sections of the EPP. All completed logs and forms are to be submitted to the appropriate departments.

	Environmental Protection Plan	Issue Date: <u>May 1, 2019</u> August 30, 2016 Revision: <u>1</u> For review purposes only	Page 114 of 115
	Environment	Document #: BAF-PH1-830-P16-0008	

3.1 CULTURAL HERITAGE AND CHANCE FIND DISCOVERY FORM

SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION #	REVISION DATE
3.1	Cultural Heritage Chance Find Discovery Form	A	July 15, 2014
Cultural Heritage Chance Find Discovery Form			Reference No. (Environment Department to assign)
Please complete this form in the event of a chance find of a suspected burial, archaeological finds scatter, or an isolated find of a single artifact (e.g. stone tools/arrowheads, eggshell, pottery, concave milling/grinding stones, spherical hammerstones)			
Date of discovery			Time
Name of discoverer/team			Tel no. Email
Location of the discovery	Project area : GPS coordinates :		
Description of archaeological discovery			
Estimated weight	Kg		
Dimensions	x x cm		
Sketch of discovery area		Drawing of chance find(s)	
Temporary protection implemented			
Name	Signature		Date
Received by Environmental Manager	Signature		Date
Notes : If you need more room to draw or describe the discovery area/finds, please use back of the page. <u>Please return this form to the Environment Department as soon as possible (within 24 hours of discovery at the most).</u>			



Environmental Protection Plan

Issue Date: [May 1, 2019](#) [August 30, 2016](#)

Page 116 of 117

Revision: ~~1~~ [For review purposes only](#)

Environment


Document #: BAF-PH1-830-P16-0008

Date	Where (GPS)	Number of People In Party	Inuit or Non-Inuit	Activities Observed (Camp, Hunting, Travel, Etc.)



The information contained herein is proprietary Baffinland Iron Mines Corporation and is used solely for the purpose for which it is supplied. It shall not be disclosed in whole or in part, to any other party, without the express permission in writing by Baffinland Iron Mines Corporation.

Note: This is an UNCONTROLLED COPY. All staff members are responsible to ensure the latest revision is used.

	Environmental Protection Plan	Issue Date: May 1, 2019 August 30, 2016 Revision: 1 For review purposes only	Page 117 of 118
	Environment	Document #: BAF-PH1-830-P16-0008	

3.3 VISITOR ACCESS ROUTES

SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION #	REVISION DATE
3.3.1	Mary River Visitor Access Routes	BA	December 21, 2018 July 29, 2016

[Snowmobiles to be parked in the designated parking location only \(blue area on map below\). Snowmobiles are not permitted within the camp work area, including the weatherhaven or pick-up truck parking lot.](#)

[Mary River mine site is an operating work site and is restricted to all visitors for their safety. Visitors are asked to stay within the foot access area only \(yellow area on map below\).](#)

[Visitors are asked to sign in with Security or the Fire Water located in the room at the back of the games room in the weatherhaven.](#)

