

ATTACHMENT 30

Interim Closure and Reclamation Plan

(415 Pages)

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 1 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Baffinland Iron Mines Corporation

DRAFT Interim Closure and Reclamation Plan

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

This document provides revisions to:
Document # BAF-PH1-830-P16-0012
Rev 6 (Draft for Review) April 2021

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 2 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Baffinland Iron Mines Corporation

INTERIM CLOSURE AND RECLAMATION PLAN

BAF-PH1-830-P16-0012

Revised Draft – Rev 6

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 3 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

DOCUMENT REVISION RECORD

Issue Date MM/DD/YY	Revision	Prepared By	Approved By	Issue Purpose
06/07/2013	0	AG	EM	Approved for Use (H349000-1000-07-126-0012)
03/10/2014	1	JM	EM	Approved for Use (BAF-PH1-830-P16-0012)
06/27/2014	2	JM	EM	Approved for Use (BAF-PH1-830-P16-0012) <i>Note Change in Title from Interim Abandonment and Reclamation Plan</i>
03/19/2015	3	AG	EM	Approved for Use (BAF-PH1-830-P16-0012)
10/15/2015	4	AG	EM	Approved for Review (BAF-PH1-830-P16-0012)
10/30/2015	4	AG	JM	Approved for Review (BAF-PH1-830-P16-0012)
03/31/2016	4	AG	JM	Approved for Review (BAF-PH1-830-P16-0012)
05/31/2016	5	AG	JM	Approved for Review (BAF-PH1-830-P16-0012)
08/01/2016	5	AG	JM	Approved for Review (BAF-PH1-830-P16-0012)
10/06/2016	5	AG	WM	Approved for Review (BAF-PH1-830-P16-0012)
29/06/2018	5	CM	MLH	Approved for Review (BAF-PH1-830-P16-0012)
19/10/2018	5	RS, CM	MLH	Approved for Review (BAF-PH1-830-P16-0012)

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 4 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

TABLE OF CONTENTS

1	PLAIN LANGUAGE SUMMARY	10
2	INTRODUCTION	19
2.1	Purpose and Scope of ICRP	19
2.2	ICRP Goal and Principles.....	20
2.2.1	Policies and Guidelines for Final Closure.....	20
2.2.2	Site Abandonment Goal	21
2.2.3	Closure Principles to Achieve Site Abandonment Goal.....	21
2.3	Closure and Reclamation Planning Team	22
2.3.1	Closure Plan Progression	22
2.4	Engagement and Post-Closure Land Use	25
2.5	Regulatory Instruments for Closure and Reclamation	33
2.5.1	Annual Security Review	34
2.5.2	Project Updates and Reporting	34
3	PROJECT ENVIRONMENT.....	36
3.1	Atmospheric Environment.....	36
3.1.1	Climate.....	36
3.1.2	Air Quality.....	38
3.1.3	Noise and Vibration	40
3.2	Physical (Terrestrial) Environment.....	40
3.2.1	Topography.....	40
3.2.2	Permafrost.....	41
3.2.3	Surficial and Bedrock Geology.....	42
3.2.4	Hydrology and Drainage	44
3.3	Chemical Environment	44
3.3.1	Surficial Soil Chemistry	44
3.3.2	Surface Water and Sediment Quality.....	45
3.3.3	Geochemistry	46
3.4	Biological Environment	48
3.4.1	Vegetation	48
3.4.2	Aquatic Wildlife	49
3.4.3	Terrestrial Wildlife.....	50
3.4.4	Marine Wildlife.....	52
3.5	Socio-Economic Environment	60
3.5.1	Nearby Communities.....	61
3.5.2	Traditional Land Use.....	62

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 5 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

3.5.3	Protected Areas	64
4	<i>PROJECT INFORMATION</i>	67
4.1	Location and Access	67
4.1.1	Proponent Name and Address	67
4.2	Project History	67
4.3	Site Geology.....	70
4.3.1	Regional Geology.....	70
4.3.2	Iron Ore Deposit Geology	70
4.3.3	Geotechnical Overview	71
4.4	Project Summary.....	72
4.4.1	Inuit Owned Lands Land Access	91
5	<i>PERMANENT CLOSURE AND RECLAMATION</i>	92
5.1	Definition of Permanent Closure and Reclamation.....	92
5.1.1	Closure Objectives and Criteria	93
5.2	Permanent Closure and Reclamation Requirements	100
5.2.1	Open Pit Mine Workings	101
5.2.2	Waste Rock and Overburden Piles	108
5.2.3	Quarries and Ore/Aggregate Stockpiles.....	121
5.2.4	Buildings and Equipment.....	125
5.2.5	Mining Infrastructure	128
5.2.6	Transportation Routes.....	133
5.2.7	Waste, Landfills and other Disposal Areas	138
5.2.8	Water Management Systems	148
6	<i>PROGRESSIVE RECLAMATION</i>	155
6.1	Definition of Progressive Reclamation	155
6.2	Opportunities for Progressive Reclamation.....	155
6.2.1	Proposed Progressive Rehabilitation Measures.....	156
6.3	Completed Progressive Reclamation.....	157
7	<i>TEMPORARY CLOSURE</i>	159
7.1	Short-Term Temporary Mine Closure – Care and Maintenance	159
7.1.1	Health and Safety of Workers and the Public During Temporary Closure	159
7.1.2	Restriction of Access and Site Security.....	160
7.1.3	Security of Mine Openings	160
7.1.4	Security of Mechanical, Hydraulic Systems and Electrical Systems	160
7.1.5	Hazardous Materials & Waste Management Sites.....	161
7.1.6	Docks and Airstrip.....	161

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

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 6 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

7.1.7	Control of Effluents	161
7.1.8	Stabilization of Stockpiles.....	162
7.1.9	Site Inspection Program	162
7.1.10	Notification of Temporary Closure.....	162
7.2	Short-Term Temporary Closure Monitoring, Maintenance, and Reporting.....	162
7.3	Long-Term Temporary Mine Closure and Suspension of Activities.....	163
7.3.1	Health and Safety of Workers and the Public During Long-term Temporary Closure	164
7.3.2	Restriction of Access and Site Security.....	164
7.3.3	Security of Open Pit.....	165
7.3.4	Security of Mechanical, Hydraulic, and Electrical Systems	165
7.3.5	Hazardous Materials and Waste Management Sites	165
7.3.6	Stabilization of Stockpiles.....	166
7.3.7	Docks and Airstrip.....	166
7.3.8	Control of Effluents	166
7.3.9	Site Inspection Program	167
7.4	Long-Term Temporary Closure Monitoring, Maintenance, and Reporting.....	167
8	INTEGRATED SCHEDULE OF ACTIVITIES.....	169
8.1	Duration of Closure Activities	170
8.2	Summary of Activities during Final Closure by Year	171
9	POST-CLOSURE SITE ASSESSMENT	175
9.1	Short-Term Temporary Care and Maintenance Program	178
9.2	Long-Term Maintenance	178
9.3	Regulatory Reporting	179
9.4	Geotechnical Engineering Monitoring.....	179
9.4.1	Geotechnical Engineering Analyses.....	181
9.4.2	Geotechnical Monitoring Inspections	183
9.4.3	Additional site observations.....	184
9.5	Closure and Post-Closure Aquatic Monitoring and Reporting	184
9.5.1	Environmental Effects Monitoring Program (EEM)	189
9.5.2	Core Receiving Environment Monitoring Program (CREMP)	189
9.5.3	Lake Sedimentation Monitoring Program	190
9.6	Environmental Site Assessment.....	190
9.7	Terrestrial Environment Monitoring and Reporting.....	191
9.8	Marine Environment Monitoring and Reporting	192
9.9	Safety Compliance Inspection.....	192
9.10	Socio-economic Reporting	193

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 7 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

9.11	Air Quality Monitoring and Reporting.....	194
10	FINANCIAL SECURITY.....	196
10.1	Preliminary Mine Closure and Reclamation Plan Estimate and Updates	196
10.2	Phase 2 Proposal	197
11	CONCORDANCE TABLES	199
12	GLOSSARY OF TERMS, ACRONYMS, OR ABBREVIATIONS.....	243
12.1	Glossary of Terms.....	243
12.2	Acronyms and Abbreviations.....	250
13	REFERENCES	254
Appendix A	Preliminary Mine Closure and Reclamation Plan Drawings.....	257
Appendix B	Mine Closure and Reclamation Planning Guidelines, Regulations and Lease Requirements.....	269
Appendix C	Site Photos of Current Site Condition (2017/2018)	276
Appendix D	Reclamation Research Plans	291
Appendix E	Record of Engagement.....	314
Appendix F	Lessons Learned from Other Projects.....	324
Appendix G	Residual Effects	328
Appendix H	FEIS Freshwater Quality Predictions	357
Appendix I	Phase 2 Marginal Closure and Reclamation Financial Security Estimate.....	414

List of Figures

Figure 3.1	Proposed Tallurutiup Imanga (Lancaster Sound) National Marine Conservation Area	66
Figure 4.1	Site Location Map.....	68
Figure 4.2	Relative Location of Project Areas.....	74
Figure 4.3	Mine Site – Phase 2 Proposal Layout	75
Figure 4.4	Northern Transportation Route	76
Figure 4.5	Milne Port – Phase 2 Proposal Layout.....	77
Figure 5.1	General Layout and Development Of Deposit 1 Pit	101
Figure 5.2	Placement of Waste Rock and Overburden	111
Figure 5.3	Evolution of the Waste Rock Stockpile Over the Life-Of-Mine	112
Figure 5.4	Water Management Structures for the Waste Rock Storage Area	113
Figure 5.5	Waste Rock Placement – February 2019 through May 2019.....	114

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.

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 8 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Figure 5.6	Waste Rock Placement – June 2019 through October 2019.....	115
Figure 5.7	Waste Rock Placement – November 2019 through December 2019.....	116
Figure 5.8	Typical Water Crossing Restoration along Tote Road.	137
Figure 5.9	Major Waste Streams and Methods of Transportation	145
Figure 8.1	Schedule of Final Closure Activities.....	173
Figure 9.1	Anticipated Closure and Post Closure Monitoring & Reporting Program Schedule for Major Mine Areas.....	177
Figure 9.2	Milne Port Site Plan	186
Figure 9.3	Mary River Mine Site Plan	187
Figure 9.4	Dust Fall Sample Locations for the Project Area	188

List of Tables

Table 1.1:	Outline of Major Reclamation Activities at Each Mine Area	15
Table 2.1:	Applicable Mine Closure Planning Policies, Guidelines, and Lease Requirements	33
Table 3.1:	Measured Baseline Concentrations	39
Table 3.2:	Baseline Dustfall Deposition Rates.....	39
Table 3.3:	Baseline Metal Deposition Rates for Select Metals	39
Table 3.4:	Baseline Noise Monitoring Results.....	40
Table 3.5:	Total Amounts of Organic Matter And Primary Nutrients In Soils in the Project Area	45
Table 4.1:	Major Project Components	78
Table 4.2:	Key Facts Table	84
Table 4.3:	Drawings for Mine Closure and Reclamation	90
Table 5.1:	Closure Objectives, Criteria and Actions by Major Project Components.....	95
Table 5.2:	Potential Water Source Pit Fill Data (Conceptual Level)	103
Table 6.1:	Summary of Conceptual Current and Proposed Progressive Rehabilitation Schedule	155
Table 9.1:	Proposed Post-Closure Geotechnical Assessment and Monitoring Requirements	180
Table 10.1:	Total Cost and Breakdown for Mary River Project Closure and Reclamation.....	196
Table 10.2	Mary River Project ‘Global’ Closure and Reclamation Security Summary – Phase 2 Estimate	198
Table 11.1:	Conformity Assessment of the CIRNAC Guidelines to the ICRP	202
Table 11.2:	QIA Abandonment and Reclamation Policy for Inuit Owned Lands Concordance Table	205
Table 11.3:	NIRB Project Certificate Term and Conditions Concordance Table	207
Table 11.4:	Type ‘A’ Water Licence 2AM-MRY1325 Amendment No.1, Part J, Item 2.....	241

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 9 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

FOREWORD

The Interim Closure and Reclamation Plan (ICRP) builds on the Preliminary Closure and Reclamation Plan (PCRP) which was reviewed and approved by the Nunavut Impact Review Board (NIRB) under Project Certificate 005 and its amendment, and, by the Nunavut Water Board (NWB) with the issuance of Type 'A' Water Licence 2AM-MRY1325 and Amendment No. 1. The ICRP reflects the requirements of Qikiqtani Inuit Association (QIA) Commercial Lease No. Q13C301 and requirements of Part J, Item 2 of the Type 'A' Water Licence, 2AM-MRY1325 - Amendment No. 1 which requires the March 2015 ICRP to be updated 60 days after the issuance of the amended Type A Licence, taking into consideration the items listed in Part J, Item 2. The revised plan is to address the relevant comments and recommendations provided by intervening parties during the review period for the Type A Licence amendment application.

The development of the PCRP and subsequent development of the ICRP is based on Crown Indigenous Relations and Northern Affairs Canada (CIRNAC, formerly AANDC) guidelines¹ which envisage three primary stages in the development of a Mine Closure and Reclamation Plan (or A&R Plan):

- A Preliminary Closure and Reclamation Plan
- An Interim Closure and Reclamation Plan
- A Final Closure and Reclamation Plan

The ICRP considers the complete development of the Project and describes expected closure activities at the end of the Project Life (21 year mine life). The ICRP is thus a conceptual benchmark for the intended reclamation and closure activities associated with all components of the Mary River project approved under Project Certificate No. 005 and its Amendment No 1. The ICRP will be updated as required throughout the life of the Project. This revision (Rev 6) considers the addition of components of the Phase 2 Proposal.

As per Type "A" Water License 2AM-MRY1325 - Amendment No. 1 and QIA Commercial Lease No. Q13C301, the Final CRP will be developed and submitted no later than one (1) year, or earlier if possible, before scheduled permanent closure or immediately after notification of an unplanned closure (within 120 days) to provide greater detailed descriptions of the proposed reclamation activities in such a manner that they can be subsequently implemented. If future revisions of referenced Project authorizations were to require this to change, this timeframe will be adjusted accordingly.

¹ MVLWB/AANDC, Guidelines for the Closure and Reclamation of Advanced Mineral Exploration and Mine Sites in the Northwest Territories, November 2013

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 10 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

1 PLAIN LANGUAGE SUMMARY

BACKGROUND AND INTRODUCTION

The Mary River Project (the Project) is located on north Baffin Island, in the Qikiqtani Region of Nunavut. The Project is wholly owned by Canadian mining company Baffinland Iron Mines Corporation (Baffinland). The scope of the Project is defined by Project Certificate No 005 (and its Amendment No 1) and Type A Water Licence 2AM-MRY1325 - Amendment No. 1. The Project's Interim Mine Closure and Reclamation Plan (ICRP) is considered to be a "living" document, which is refined regularly throughout the life of mine until a Final Closure and Reclamation Plan is achieved. Ongoing iterations to the ICRP will address issues such as notable changes to the Project and refinements to the closure design based on findings from operational data collection (e.g. community engagement, environmental monitoring, research studies, etc.). This version of the ICRP builds on the initial Preliminary Mine Closure and Reclamation Plan (PMCRP) (H337697-0000-07-126-0014) presented in Volume 3, Appendix 3B, Attachment 10 of the Mary River Project Final Environmental Impact Statement (FEIS) and approved by Nunavut Impact Review Board (NIRB).

This ICRP document has been developed in accordance with applicable requirements from numerous regulatory instruments and guidelines, including the following primary sources:

- Conditions applying to security and abandonment, closure and reclamation or temporary closure in Type "A" Water Licence 2AM-MRY1325 - Amendment No. 1.
- Conditions applying to closure and reclamation set forth in Commercial Lease No. Q13C301.
- The Project Certificate No. 005 (December 28, 2012) and its associated Amendments (May 28, 2014 and Ministerial Approval dated September 30, 2018) terms and conditions.
- The Qikiqtani Inuit Association (QIA) Abandonment and Reclamation Policy for Inuit Owned Lands (Version 3.0, 2013).
- Mackenzie Valley Land and Water Board (MVLWB)/Aboriginal Affairs and Northern Development Canada (AANDC) Guidelines for the Closure and Reclamation of Advanced Mineral Exploration and Mine Sites in the NWT (2013).

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 11 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

DOCUMENT ORGANIZATION

Following development of the PMCRP in 2011, Baffinland agreed to reorganize the ICRP document at QIA's request to follow the recommended template provided in the MVLWB/AANDC Guidelines for the Closure and Reclamation of Advanced Mineral Exploration and Mine Sites in the Northwest Territories. These Guidelines were released in 2013. This ICRP follows the suggested template with some minor exceptions, and includes the following major topics of discussion:

- Section 2** Provides the purpose, scope, and goal of the ICRP, outlines the closure and reclamation planning team, details the approach for engagement, and summarizes regulatory instruments (permits, authorizations, and agreements) for closure and reclamation;
- Section 3** Provides a description of pre-disturbance (baseline) conditions for the atmospheric, physical (terrestrial), biological and socio-economic environment;
- Section 4** Provides a detailed description of the Mine, including the location and access, project history, site geology, and high-level project summary;
- Section 5** Provides a detailed description for the permanent closure of the Mine for each of the mine components, including the expected final conditions. This Section contains the bulk of available detail for how the Mine will be closed, the reclamation targets Baffinland seeks to achieve (closure objectives and criteria) and the other key components of the closure design (e.g. performance monitoring, uncertainties, contingency planning).;
- Section 6** Provides a description of planned and completed progressive reclamation at the Mine site;
- Section 7** Discusses planning for short-term temporary mine closure and long-term mine closure and suspension of activities.
- Section 8** Provides a schedule for the planned closure activities;
- Section 9** Provides a post-closure site assessment that summarizes how the residual environmental impacts of the Mine as a whole will be assessed once the selected closure activities have been completed;
- Section 10** Discusses the estimated costs associated with closure and reclamation activities
- Section 11** Provides a tabulated summary of the ICRP's concordance with the primary regulatory instruments
- Section 12** Glossary of terms, acronyms, and abbreviations
- Section 13** References
- Appendix A** Provides the closure drawings
- Appendix B** Provides a tabulated summary of mine closure and reclamation planning guidelines, regulations, and lease requirements
- Appendix C** Presents recent photos of major work areas
- Appendix D** Discusses the Reclamation Research Plans developed to address items such as pit water quality, waste rock seepage quality and natural revegetation efforts

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 12 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

- Appendix E** Provides a record of engagement on closure issues
- Appendix F** Discusses lessons learned from other sites applicable to the closure and reclamation of this Project
- Appendix G** Summarizes residual effects predictions from the Phase 2 Proposal
- Appendix H** Summarizes FEIS Freshwater Quality Predictions (Based on FEIS and its Addendum, Volume 7, Section 3.4, and Phase 2 Proposal TSD 13)

UPDATES TO THE CLOSURE PLAN

This interim closure and reclamation plan will be updated as the project progresses taking into account lessons learned, the results of research and monitoring data, input from stakeholders, and changes to how the site is operated.

To account for interim closure and reclamation security adjustments to reflect project development phases until such a time planned closure commences, an updated determination of Project closure and reclamation security is currently captured on an annual basis in Annual Security Review (ASR) process to account for any planned constriction activities. This is done incrementally and reflects closure requirements if Baffinland is not able to reach its planned closure phase. The ASR process is conducted in accordance with Part C and Schedule C of Type “A” Water License 2AM-MRY1325 - Amendment No. 1 and Section 9.2 of the Commercial Lease, No. Q13C301, agreed to between Baffinland and the QIA and includes consultation with Land-owners and other key stakeholders. The results of this ASR process should be considered on the interim basis to assess Project closure and reclamation liability for the end of the upcoming year until such time planned closure commences. In all cases, closure and reclamation liability estimates adhere to required closure and reclamation guidelines including, but not limited to, the QIA Abandonment and Reclamation policy guiding principles and stated assumptions.

As per Type “A” Water License 2AM-MRY1325 and QIA Commercial Lease No. Q13C301, the Final Mine Closure and Reclamation Plan will be developed and submitted at least one year before a scheduled permanent closure or within 120 days of the notification of an unplanned closure. The Final Mine Closure and Reclamation Plan will provide more detailed descriptions of the proposed reclamation activities in such a manner that they can be subsequently implemented. If future revisions of referenced Project authorizations were to change, this timeframe will be adjusted accordingly.

The Final Mine Closure and Reclamation Plan will be issued to relevant stakeholders including the Land Use Engineer of CIRNAC (Territorial Land Use Regulations, Sections 33 and 35), to the Lands Director at QIA, and to the Nunavut Water Board.

Prior to closing out the Project, Baffinland will consult with the Landlord and surrounding communities regarding transfer of ownership of structures that may be utilized by the surrounding communities during harvests, camping, and other recreational uses or relocated to local hamlets.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 13 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

PROJECT AND CLOSURE SUMMARY

Project related facilities were designed and constructed to minimize the footprint. These design and construction considerations have facilitated reclamation plans and minimized the engineering required to support the complete decommissioning and reclamation of the site.

Three closure scenarios and their associated closure and reclamation activities are described in this ICRP: Short-Term Temporary Care and Maintenance, Long-Term Temporary Mine Closure and Final Mine Closure. In addition to these scenarios, progressive reclamation measures have been proposed to facilitate temporary and final mine closures measures.

Temporary closure, Short-Term Temporary Care and Maintenance or Long-Term Temporary Mine Closure, occurs when the Project ceases Operation with the intent of resuming activities in the future. During temporary closure, Baffinland will maintain all operating facilities and programs necessary to protect humans, wildlife, and the environment, including necessary environmental monitoring. Short-Term Temporary Care and Maintenance activities will occur if the Project ceases operation for a period of less than one (1) year with the intent of resuming activities in the future. Long-Term Temporary Mine Closure will occur if the Project ceases operation for a period of greater than (1) year with the intent of resuming activities in the future.

In Short-Term Temporary Care and Maintenance, all facilities and equipment would be secured and de-energized. An inventory of all hydrocarbon products, chemicals, hazardous wastes and explosives would be carried out and all effluents would be monitored. Personnel necessary, including environmental personnel, to maintain site security and project monitoring requirements would remain on site.

During Long-term Temporary Mine Closure the Project sites will be maintained in a secure condition, all facilities and equipment would de-energized and winterized. Hazardous waste and explosives would be removed from the site. Personnel necessary, including environmental personnel, to maintain site security and project monitoring requirements would remain on site.

Final Mine Closure and Reclamation will occur when there is no foreseeable intent by Baffinland to return to active mining. Final Mine Closure and Reclamation will include removing all infrastructure, equipment and materials into an on-site landfill, the Mine Pit, quarries and/or other approved disposal location(s) for disposal of inert, non-hazardous, non-combustible materials. All other infrastructure, equipment and materials will be sent off-site to an approved disposal location. Arrangements will be made with a sealift contractor to collect materials and equipment at Milne Port to ship material destined for off-site transport. The airstrips will be closed and reclaimed unless otherwise directed by regulatory agencies or the Land Owner in order to provide emergency/rescue landing spots for regional aircraft and access for post closure monitoring. Permanent dock structures will be left in place at Milne Port and Steensby Port but all surface equipment and materials will be removed. Disturbed areas would undergo contouring of ground or granular surfaces as required to maintain stability and natural drainage patterns will be re-established, if required, as reasonably possible. At Final Mine Closure and Reclamation, project

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 14 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

components will be inspected to ensure specific closure objectives of project components are achieved and closure principles of long-term safety of the site, no long-term active care requirements, physical stability and chemical stability have been met.

Following the closure activities, there will be several long-term landform changes, including: the creation of waste rock pile, the creation of a mine pit lake where previously there had been a hilltop, and several small quarries will be visible landforms.

The final closure and reclamation activities are expected to last a period of three (3) years based on estimated duration and level of effort required for identified closure activities². Post closure monitoring will continue until closure principles of long-term safety of the site, no long-term active care requirements, physical stability and chemical stability have been shown to be met by monitoring results. These activities may be periodic. It is currently estimated post closure monitoring and follow-up inspections will be conducted for a period of fifteen (15) years based on impacts assessment determinations described in the Mary River Project Final Environmental Impact Statement.

An outline of major reclamation activities for each mine area, and the envisioned post-closure landscape is presented on the following page.

² Estimated duration and level of effort required for identified closure activities is described in 'Annual Security Review (ASR)' documentation required under Section 9.2 of the Commercial Lease, No. Q13C301, and under Part C and Schedule C of the NWB Type "A" Water Licence No. 2AMMRY1325.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 15 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 1.1: Outline of Major Reclamation Activities at Each Mine Area

Area	Project Operations	Major Reclamation Activities	Post Closure Landscape
Milne Port	Deep water port operation, with ore dock, ship loading facilities, ore stockpiles and stormwater ponds. A second ore dock will be constructed in Phase 2. Other primary infrastructure includes a freight dock, accommodations with sewage treatment plant, power plant, warehouse/garages, fuel storage, landfarm and hazardous waste storage area, polishing ponds, and quarry/borrow areas. Other major infrastructure planned for Phase 2 includes secondary crusher facilities, rail off-loading facilities and other supporting structures	Decommissioning of all infrastructure, removal of building materials and hazardous waste from site. Ore stockpiles removed. All equipment and supplies will be removed. Assessment and potential removal of contaminated soils. Grading of earthen structures and disturbed areas to re-establish natural drainage pathways where acceptable.	No visible foreign building materials will remain. Deep water docks will remain in place. Disturbed areas will be graded to establish stable drainage pathways that do not require maintenance. Natural recovery of vegetation will occur over many years. Surface materials will be scarified to accelerate recovery in priority areas. Ship traffic associated with the mine will stop. Travel to site for post-closure monitoring will be via aircraft only.
Tote Road	Ore hauling road from the Mine site to Milne Port. Approximately 100 km long, all-season gravel road. The road includes over a hundred water crossings consisting of culverts and four bridges. Ore is hauled by truck and trailer assembly, with payload of roughly 150 tonnes. Water intake infrastructure from permitted sources for dust suppression. Quarries and borrow areas exist along the road. Upon completion of the North Railway (see below), the Tote Road will no longer be the primary route for the transportation of ore.	Removal of all water crossing structures, water intakes, and equipment associated with quarries and borrow areas. Assessment of bridge abutments for long-term physical stability, and potential removal of fill. Streambed and banks will be assessed for physical stability and alterations will be made as necessary. Grading at quarries and borrow areas to re-establish natural drainage pathways where possible.	Remaining sections of the road adjacent to former water crossings will be shaped to maintain long-term stability. Tote road traffic associated with mining will stop. No further maintenance of the road will be completed by BIM. Remaining sections of the road may be used by land users. At former water crossings, banks will be graded to provide access for ATVs. Natural recovery of vegetation will occur over many years. Surface materials will be scarified to accelerate recovery in priority areas.

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 16 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 1.1: Outline of Major Reclamation Activities at Each Mine Area

Area	Project Operations	Major Reclamation Activities	Post Closure Landscape
North Railway	A railway between the Mine Site and Milne Port along the Northern Transportation Corridor is included in the Phase 2 proposal. Upon completion of construction, up to 12 Mtpa of ore will be transported via rail.	Removal of all water crossing structures, and equipment associated with quarries and borrow areas. Streambed and banks will be assessed for physical stability and alterations will be made as necessary. Grading at quarries and borrow areas to re-establish natural drainage pathways where possible.	Disturbed areas will be graded to establish stable drainage pathways that do not require maintenance. Natural recovery of vegetation will occur over many years. Surface materials will be scarified to accelerate recovery in priority areas.

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 17 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 1.1: Outline of Major Reclamation Activities at Each Mine Area

Area	Project Operations	Major Reclamation Activities	Post Closure Landscape
Mine Site	Mining operations commencing on a hill crest outcrop, progressing to open pit mining following 10-12 years of mining at full production rates. A haul road exists from the orebody to the Ore crushing/loading facilities and Waste Rock Stockpile. Supporting infrastructure includes the airstrip and helipad, utilities (power, water, sewage), warehouses/garages, offices, accommodations camp, landfill, explosives storage and emulsion plant, sedimentation and polishing ponds, quarries and borrow areas.	The final Open Pit will be flooded by natural inflows and active pumping. An engineered spillway will be constructed to discharge overflowing water to a tributary of the Mary River. The Waste Rock Stockpile will be progressively reclaimed during mining by placement of a 50 m thick cover of non-PAG rock over PAG rock. Decommissioning of all infrastructure, removal of building materials and hazardous waste from site. Ore at crushing/loading facilities removed. All mobile equipment and supplies will be removed. Assessment and potential removal of contaminated soils. Grading of earthen structures and disturbed areas to re-establish natural drainage pathways where acceptable.	Current estimates for the final Open Pit include a footprint of approximately 1 km by 1.75 km wide with roughly 200 m average depth. The Waste Rock Pile will be approximately 250 m high at its highest point. Actual dimensions of these areas are irregular and may change based on the orebody and market conditions. Water treatment is not expected to be required at the Open Pit and Waste Rock Stockpile. No visible foreign building materials will remain. Disturbed areas will be graded to establish stable drainage pathways that do not require maintenance. Natural recovery of vegetation will occur over many years. Surface materials will be scarified to accelerate recovery in priority areas.

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 18 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

PREDICTIONS FOR POST-CLOSURE CONDITIONS

Following reclamation, all Project areas are expected to be physically and chemically stable. Excluding the Open Pit and Waste Rock Stockpile areas, water quality is predicted to return to pre-disturbance levels, and the wildlife may begin to safely access the area again. Changes to water quality and fish and fish habitat in Mary River and Camp Lake (including tributaries) downgradient from the Open Pit and Waste Rock Stockpile have been identified as a research priority of Baffinland. Baseline studies indicated natural fluctuations in concentrations of several metals (reflecting the nature of the regional geology) exceeded water quality (CCME) and safe fish consumption (Health Canada) guidelines. This is unlikely to improve following mining.

Disturbed areas will be graded to re-establish natural drainage pathways where practical, and natural revegetation will be promoted in priority areas by scarifying the surface materials to assist recovery. The revegetation process is expected to take many years, and may never return to baseline conditions in certain locations. Communities have indicated a preference to leave select infrastructure in place (e.g. Ore Dock, Tote Road, Airstrip), but the majority of non-native materials will be removed or no longer visible.

Baffinland has committed to a rigorous monitoring program which is laid out in Project permits (i.e. NIRB Project Certificate, NWB Type A Water Licence), and will adaptively manage operations and mitigation strategies to effectively minimize post-closure residual effects where practical. Monitoring results will be reported to government agencies and the QIA for review and comment on an ongoing basis, and working groups have been established specifically to monitor Terrestrial and Marine effects during mining, to avoid unforeseen impacts post-closure. Ongoing mine closure planning will also be informed by community engagement feedback, and focus studies which may address priority areas.

FOCUS OF THIS REVISION

This revision of the ICRP has been completed to include aspects of the Phase 2 Proposal which were submitted in September 2018 to the Nunavut Impact Review Board and Nunavut Water Board.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 19 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

2 INTRODUCTION

2.1 PURPOSE AND SCOPE OF ICRP

This Interim Mine Closure and Reclamation Plan (ICRP) outlines the closure goal, principles, objectives, criteria and activities associated with the final closure and reclamation of the Project as approved under Project Certificate No 005 and its Amendment No.1 issued by the Nunavut Impact Review Board (NIRB) on May 28, 2014, and as outlined in the Phase 2 Proposal.

Mine closure and reclamation for the Project is regulated under Baffinland's Commercial Lease No. Q13C301, Type 'A' Water Licence 2AM-MRY1325 - Amendment No. 1, and Crown Indigenous Relations and Northern Affairs Canada (CIRNAC) Land Lease 47H/16-1-2. In cases, if any, where there was conflict between Type 'B' Water Licence 8BC-MRY1314 and the amended Type 'A' Water Licence, Baffinland will adhere with the terms and conditions of the Type 'A' Water Licence. In cases where the term 'Abandonment and Reclamation (A&R)' is used in authorizations, regulations and other forms of communication, Mine Closure and Reclamation (MCR) is synonymous for the purpose of the Mary River Project.

The ICRP considers the complete development of the Mary River Project (the Project) and describes expected closure activities at the end of the Project Life.

The expected schedule for implementation of the Phase 2 Proposal, with consideration of the previously approved Steensby component, is as follows:

- Increase mine production to 12 Mtpa by 2020 with the operation of the North Railway line; and
- Increase mine production by 18 Mtpa by 2024 with the operation of the South Railway and Steensby Port.

Under this implementation schedule, the Project Life for Deposit No. 1 is expected to be 17 years.

Based on the existing development plan and the known mineral resource in Deposit No. 1, the mine will be exhausted by 2035. If additional mineable iron ore is not identified in Deposit No. 1 or in adjacent deposits, the mine will advance through a 3-year active closure phase (2036 to 2039).

As planned final closure is decades away, the ICRP is thus a conceptual benchmark for the intended reclamation and closure activities associated with all components of the Mary River project approved under Project Certificate No. 005. The ICRP will be updated as required throughout the life of the Project.

As per Type "A" Water License 2AM-MRY1325 and QIA Commercial Lease No. Q13C301, the Final Closure and Reclamation Plan (Final CRP) will be developed and submitted no later than one (1) year, or earlier if

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 20 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

possible, before scheduled permanent closure or immediately after notification of an unplanned closure (within 120 days) to provide greater detailed descriptions of the proposed reclamation activities such a manner that they can be subsequently implemented. If future revisions of referenced Project authorizations were to change, this timeframe will be adjusted accordingly.

2.2 ICRP GOAL AND PRINCIPLES

Over the life of the Project it is expected that closure and reclamation techniques and methodologies for site reclamation will continue to evolve with changes to the understanding of the Project site, stakeholder's views, and technologies for cost effective and practical reclamation in northern conditions. Planning for mine site reclamation will be based on the protection of human health and the environment, and remain dynamic to take into account the results of ongoing and future studies and identified best practices.

2.2.1 POLICIES AND GUIDELINES FOR FINAL CLOSURE

The Project is being designed with closure and reclamation considerations in mind in compliance with the Baffinland Sustainable Development Policy (Baffinland, 2015). General closure and reclamation objectives of this ICRP correspond with the QIA A&R Policy (QIA, 2013). The main goals of this Policy and the above guidelines and regulations are to:

- Apply the principles of pollution prevention and continuous improvement to minimize ecosystem impacts and facilitate biodiversity conservation.
- Use energy resources, raw materials and natural resources efficiently and effectively.
- Engage with governments, employees, local communities and the public to create a shared understanding of closure and reclamation issues and take their views into consideration in making decisions.
- Return the Project affected and viable sites (Milne Port, Mine Site, and Quarries) to “wherever practicable, self-sustaining ecosystems that are compatible with a healthy environment and human activities” (NRCan 1994).
- Where practicable, undertake reclamation of affected areas in an ongoing and progressive manner to reduce the environmental risk once the mine ceases operation (INAC 2002a, 2002b; Northwest Territories Water Board 1990; QIA 2013).
- Provide for the reclamation of affected sites and areas to a stable and safe condition and restore altered water courses to near their original alignment and cross-section. Where practical, affected areas will be returned to a state compatible with the original undisturbed area (Territorial Land Use Regulations).

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 21 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

- Restore altered water courses to their original alignment and cross-section (Territorial Land Use Regulations).
- Reduce the need for Long-term monitoring and maintenance by designing for closure and instituting progressive reclamation, when possible.
- Provide for mine closure using the current available proven technologies in a manner consistent with sustainable development.
- Provide sufficient detail such that adequate scopes of work can be developed for the execution of reclamation work. Where insufficient details exist, monetary allowances should be included in the reclamation security cost estimate to account for additional engineering and planning. Identification of the specific aspects of closure planning requiring refinement to reach a Final CRP and the corresponding reclamation security amounts are determined as part of the ASR process.

2.2.2 SITE ABANDONMENT GOAL

In accordance with the above Policy, regulations, and guidelines, the site abandonment goal of the final closure activities is to return project sites and affected areas to viable and, wherever practicable, self-sustaining ecosystems that are compatible with a healthy environment and with human activities³.

2.2.3 CLOSURE PRINCIPLES TO ACHIEVE SITE ABANDONMENT GOAL

In order to achieve the Site Abandonment Goal, closure objectives and criteria have been selected for Project components (Section 5) based on the following Closure Principles:

- Ensure the safety of the abandoned sites for wildlife and human users.
- Ensure physical stability of abandoned Project sites and remaining physical features (open pit, waste rock stockpile, quarries, road and railway embankments, stream crossings).
- Ensure chemical stability of the mine open pit, waste rock stockpile, quarries, and, other Project disturbed areas.
- Incorporate considerations for future land use of Project sites in final closure planning (to be informed over time by the Mine Closure Working Group (MCWG)).
- Achieve the “Recognized Closed Mine” status in as minimal duration as reasonably practical, as defined by Part (4) of the Metal and Diamond Mining Effluent Regulations (MDMER, formerly the Metal Mining Effluent Regulations) SOR/2002-222 dated 1 June 2018 and ensure no requirements for long-term active care.

³ Based on alignment with Guidelines for the Closure and Reclamation of Advanced Mineral Exploration and Mine Sites in the Northwest Territories (MVWLB/AANDC, 2013)

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 22 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

- Implement reclamation in a progressive, ongoing manner during the life of the Project and restore sites as soon as an area is no longer required for operations to limit the need for long-term maintenance and monitoring.
- Reclaim disturbed Project areas such that no long-term active care is required.
- The objectives and criteria proposed for implementing Final Closure and achieving the stated goal and principles are discussed in Section 5.1.1 of this ICRP.

2.3 CLOSURE AND RECLAMATION PLANNING TEAM

The Mary River Project ICRP contains and describes the plans related to closure and reclamation of the Project. The ICRP addresses the activities expected to be required to ensure the Project closure goal, principles, objectives, and criteria are met. Participation of local communities and other stakeholders in the consideration of alternative reclamation activities to safeguard community values is encouraged as the Project proceeds. Currently, closure planning related to the Project is the responsibility of the Sustainable Development Department at Baffinland with support consultants. Stantec Consulting Ltd. has provided input on this revision of the ICRP.

2.3.1 CLOSURE PLAN PROGRESSION

2.3.1.1 PRELIMINARY MINE CLOSURE AND RECLAMATION PLAN

A Preliminary Mine Closure and Reclamation Plan (PCRP) (H337697-0000-07-126-0014) was prepared for Baffinland in support of the regulatory approval process, including the Final Environmental Impact Statement (FEIS) for the Project, and was based on available Project design information which was at a conceptual level. The PCRP assumes that the reader has access to and is familiar with the FEIS content.

The purpose of the PCRP was to provide an initial closure and reclamation plan for the Mary River Project, at a conceptual level, in accordance with the regulatory framework established by the Inuit, Federal and Territorial governments.

2.3.1.2 INTERIM MINE CLOSURE AND RECLAMATION PLAN

The ICRP builds on the PCRP which was reviewed and approved by NIRB under Project Certificate 005 and its amendment, and, by the Nunavut Water Board (NWB) with the issuance of Type A Water Licence 2AM-MRY1325. The ICRP reflects the requirements of Commercial Lease No. Q13C301, AANDC Land Lease 47H/16-1-2, and Part J, Item 2 of the Type A Water Licence, 2AM-MRY1325 - Amendment No. 1 which required the PCRP to be updated to an ICRP 60 days prior to the commencement of the mining operations.

The Mary River ICRP was developed to increase the detail of the closure criteria and planning presented in the PCRP. It addresses progressive rehabilitation undertaken to date and addresses temporary care and maintenance and long-term closure as well as final cessation of operations. Public health and safety is considered throughout all stages of progressive rehabilitation, closure, and post-closure.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 23 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

The ICRP does not constitute a Final Mine Closure and Reclamation Plan. The ICRP reflects the level of advancement of development on site and what is expect in future development.

2.3.1.3 UPDATES TO THE INTERIM MINE CLOSURE AND RECLAMATION PLAN

It is anticipated the ICRP will be reviewed and updated regularly throughout the life of the Project, as per the terms and conditions of the Commercial Lease No. Q13C301 and the Type “A” Water License 2AM-MRY1325 - Amendment No. 1, and AANDC Land Lease 47H/16-1-2. Once the Project reaches full planned operation, and site activities and infrastructure have stabilized, less frequent updates may be discussed with QIA. Parties reserve the right to request an update, if warranted, and any changes to the existing ICRP update schedule would require QIA approval. Updates to the ICRP are primarily expected to focus on the refinement and elaboration of the specific performance indicators and commitments and incorporating any reclamation strategy changes based on reclamation research.

Baffinland expects ICRP updates to mainly coincide with the development of the Annual Work Plans as ICRP updates will primarily be required when an Annual Work Plan calls for the construction and operation, or reclamation, of components of the Project that have not been adequately addressed previously or further information has become available or the Annual Work Plans notes material changes to project activities which would require consideration to closure and reclamation strategies. The update would also include any outcomes of the previous year’s reclamation research, if successful or positive⁴. If a previously not considered activity or project component is proposed in an Annual Work Plan, the closure strategy will be detailed in the respective Work Plan and/or its supporting documentation.

When updates to the ICRP are required, Baffinland proposes the following timetable⁵:

- By October 15 of a given year, Baffinland will provide a draft of the upcoming Annual Work Plan to the Landlord for discussion.
- By October 31 of a given year, Baffinland will submit the upcoming Annual Work Plan to all other relevant stakeholders.
- By November 30 of a given year, Baffinland expects review and comments on the upcoming Annual Work Plan from relevant stakeholders including the Landlord.
- By December 31 of a given year, Baffinland will provide an updated ICRP, if required, to the Landlord for review.

⁴ The results of any reclamation research that occur during a given year will first be reported to relevant stakeholders in that year’s NWB and QIA Annual Report.

⁵ Proposed schedule of ICRP updates will be revisited if the frequency of the ASR process changes and/or the outcomes of the water licence amendment process for the Phase 2 proposal.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 24 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

- By February 28 of the subsequent year, Baffinland expects discussions with the Landlord to be complete regarding the upcoming Annual Work Plan and ICRP revisions and Landlord approval of the ICRP, if required.
- By March 31 of the subsequent year, Baffinland will distribute the current version of the ICRP to all relevant stakeholders.

2.3.1.4 FINAL CLOSURE AND RECLAMATION PLAN

As per Type “A” Water License 2AM-MRY1325 - Amendment No. 1 and QIA Commercial Lease No. Q13C301, the Final CRP will be developed and submitted no later than one (1) year, or earlier if possible, before scheduled permanent closure or immediately after notification of an unplanned closure (within 120 days) to provide greater detailed descriptions of the proposed reclamation activities such a manner that they can be subsequently implemented. If future revisions of referenced Project authorizations were to change, this timeframe will be adjusted accordingly. The Final CRP will include a schedule for the implementation of work; any additional appropriate closure criteria based on completed reclamation research and site monitoring; and fully describe the level of detail and certainty surrounding post-closure monitoring and contingency planning.

2.3.1.5 FINAL MONITORING AGREEMENT

As per Section 12.3 and 12.4 of the QIA Commercial Lease No. Q13C301, Baffinland will submit a Final Monitoring Agreement within twelve (12) months prior to the completion of Operations. The Final Monitoring Agreement shall include, but not be limited to, provisions detailing the implementation of the contents of the Final CRP in respect of monitoring subsequent to the completion of the Operations and closure activities. The Final Monitoring Agreement will be entered into and determined with Baffinland and the Landlord before Baffinland submits the Final CRP or any other Monitoring Plans in respect thereof to other Governmental Authorities.

2.3.1.6 EXPLORATION ABANDONMENT AND RECLAMATION PLAN

The Exploration Abandonment and Reclamation Plan (BAF-PH1-830-P16-0038) is a distinct separate plan from the ICRP that describes the closure and reclamation activities and costs for the Mary River Exploration Project regulated under Baffinland’s Type “B” Water Licence No. 2BE-MRY142. In the event Mary River Exploration Project activities occur on Inuit Owned Lands, Baffinland’s IOL Commercial Lease (No. Q13C301) conditions will also then apply and the Exploration Abandonment and Reclamation Plan would be required to be reviewed and approved by the QIA. If exploration liability did occur on IOL, it is expected closure goal, principles, objectives, and criteria would apply for similar components.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 25 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

2.4 ENGAGEMENT AND POST-CLOSURE LAND USE

Baffinland's approach to stakeholder and Inuit community engagement emphasizes the importance of informing stakeholders, establishing effective communication strategies, and collecting feedback from them on potential issues and concerns.

Since 2014, the engagement program has included considerable consultation related to the Phase 2 Proposal, including the identification and discussion of topics of interest and concern regarding the proposal and potential effects. For detailed consultation information, refer to the Public Consultation Report (TSD 4), prepared in support of the Approved Project for the Phase 2 Proposal.

In support of achieving the engagement objectives defined for the Project, Baffinland implements a variety of engagement mechanisms that are intended to ensure that a broad and comprehensive approach to the identification of stakeholders and that the creation of enhanced opportunities for dialogue and input are executed. During engagement with the North Baffin communities, the QIA and other stakeholders related to the ERP, ongoing operations and the Phase 2 proposal, a few questions were raised about Project closure and reclamation. These were mainly concerned with who would be cleaning potential Project-related spills as proponents of past projects created fuel spills, which may have affected marine mammals. Some community members wondered what would happen to Project infrastructure and equipment post-closure and others asked about the status of the ICRP.

Baffinland has proposed to establish a Mine Closure Working Group (MCWG) to best incorporate considerations for post-closure land use of the Project site. The role of the MCWG will be to facilitate the integration of community representation and technical expertise by drawing on Inuit knowledge, arctic experience for similar mining operations, and discussion of alternative uses for decommissioned facilities into the reclamation options for various Project components.

A mandate or terms of reference for the MCWG is currently being developed in consultation with the QIA prior to the initial first meeting of the MCWG. Baffinland is aiming to establish this group concurrent with the Phase 2 Proposal regulatory process in order to incorporate community engagement in the planning for the working group. As a prerequisite, Baffinland will review a summary of community feedback received on mine closure to date, as well as available QIA engagement records relevant to closure. This review will help align the terms of reference, group membership, and topic identification with stakeholder priorities. While the MCWG is anticipated to be developed following community engagement during the Phase 2 regulatory process, the approval of the Phase 2 expansion is not a prerequisite for the formation of the working group, and it is anticipated that this working group will be in place by the end of 2019.

Baffinland expects an early priority for the MCWG will be to determine additional or modified reclamation research activities (Appendix D) applicable to the Project to help address identified uncertainties and determine the appropriateness of existing action levels (Section 5.2).

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 26 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

As the Project advances, Baffinland is committed to engagement with stakeholders regarding closure and reclamation issues. These issues include, but are not limited to:

- Appropriate closure and reclamation objectives and criteria based on desired future land use (aesthetics and values) of Project areas.
- Additional or modified reclamation research activities (Appendix D).
- Requirements to address identified uncertainties and determine the appropriateness of existing action levels (Section 5.2).
- Whether there will be any interest in maintaining the bulk fuel storage facilities and/or sealift landing areas for use by the local community assuming responsibility for the operation and maintenance of the facilities would be transferred to the local interested party.
- Transfer of responsibility of the Tote Road water crossings to the local community and if the Tote Road will be left completely intact assuming road operation and maintenance responsibility would then be transferred to another party. Implications for liability will need to be discussed with QIA in advance of this transfer.
- Transfer of responsibility of the North and South rail infrastructure including all water crossings and bridges, assuming rail operation and maintenance responsibility would then be transferred to another party. Implications for liability will need to be discussed with QIA and the Crown in advance of this transfer.
- Transfer of responsibility of airstrip (including airstrip lighting) to the local community assuming the airstrip is left intact and operation and maintenance responsibility would then be transferred to another party. Implications for liability will need to be discussed with QIA in advance of this transfer.
- Whether there will be any interest in transfer of salvageable materials and buildings for local community use assuming responsibility would be transferred to another party.

Baffinland anticipates relying on the MCWG to best facilitate stakeholder engagement related to the Mary River Project and incorporate considerations for post-closure land use of the Project site. Stakeholder comments and Baffinland responses related to closure and reclamation are found in Appendix E.

2.4.1 CONSIDERATION OF INUIT QAUJIMAJATUQANGIT

An Inuit Stewardship Plan (ISP) will be developed by the QIA, that will describe how Inuit monitoring activities tie into the adaptive management system and other management, mitigation, and monitoring plans. The ISP will also describe how Inuit monitoring will relate to the protection and promotion of Inuit rights defined under the *Nunavut Agreement* and described under legal agreements with Baffinland related to management and stewardship of Inuit owned lands and resources. The ISP will be the

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 27 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

framework for Inuit-led monitoring of impacts and changes within communities and on the land, waters and ice as a result of the Project. The ISP will embed a “boots on the ground” approach to monitoring whereby Inuit will be hired and trained as professional monitors for monitoring under the ISP. Through the ISP, Inuit will govern the use of Inuit knowledge and observations regarding the Project.

Further updates to this plan are expected as an outcome of the development of the ISP that articulates Inuit monitoring objectives, indicators, thresholds and responses (OITRs) related to the desired end land use and the aesthetics of the landscape at closure.

In the interim, Table 2.1 identifies the opportunities that Baffinland has explored to incorporate IQ into this Plan.

Table 2.1 Incorporation of IQ into this Management Plan

Element	Description
Environmental sensitivities and receptors	Confirmation required with Inuit through QIA-Baffinland AMP Working Group; interim Inuit objectives, indicators, thresholds and responses to be identified in this Management Plan and subject to later revision through the ISP and AMP reviews on a scheduled basis
Indicators and thresholds	Confirmation required with Inuit through QIA-Baffinland AMP Working Group
Mitigation measures	Confirmation required with Inuit through QIA-Baffinland AMP Working Group
Monitoring	Confirmation required with Inuit through QIA-Baffinland AMP Working Group
Adaptive management	Confirmation required with Inuit through QIA-Baffinland AMP Working Group
Validation of IQ Integration	To be verified by Inuit Committee
Management review	To be verified by Inuit Committee

An important aspect of integrating IQ is validating such integration with Inuit. For this reason, only potential opportunities for IQ integration have been identified. A more fulsome effort to incorporate IQ into this draft plan will be undertaken in the future, based on feedback from the Inuit Committee (to be established) and a standing Baffinland-QIA Adaptive Management Working Group, and consistent with the Adaptive Management Plan (Baffinland, 2020).

2.5 PRINCIPLES OF ADAPTIVE MANAGEMENT

2.5.1 DEFINING THE ADAPTIVE MANAGEMENT PROCESS

Adaptive management is a planned and systematic process for continuously improving environmental management practices by learning about their outcomes (Canadian Environmental Assessment Agency, 2016). Adaptive management provides flexibility to identify and implement new mitigation measures or to modify existing ones during the life of a project.

Baffinland has developed a draft Adaptive Management Plan (AMP) that provides the framework by which adaptive management is to be incorporated into Project operations (Baffinland, 2020). The Project-wide adaptive management process begins with a planning phase, followed by iterative phases of

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 28 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

implementing and monitoring the actions included in the plan(s), evaluating the effectiveness of actions included in the plans based on results of monitoring and other feedback mechanisms, and adjusting management strategies and actions and responses based on monitoring. The cycle begins anew with implementation and monitoring of a revised plan, which integrates the outcomes of the previous cycle. This cycle can occur, in real-time or over an extended period according to the nature of the situation or area of focus. In this way, a properly designed and well-implemented adaptive management process progressively diminishes uncertainty, as management strategies and processes are refined throughout a project's operational lifecycle.

Longer term review of and response to monitoring data is addressed in the review of plan effectiveness in Section 11, which includes comparison of project effects against impact predictions made in the Final Environmental Impact Statement (FEIS; Baffinland, 2012) and the addendums (Baffinland 2013, 2018). The result of the reviews of environmental monitoring, management, and operational plans will be incorporated into this plan as closure objectives, indicators and thresholds are set.

Implementation of the AMP will be overseen by a Baffinland-QIA Adaptive Management Working Group. Ongoing inputs from the Inuit Stewardship Plan as well as Baffinland's ongoing project monitoring will also form the basis of amendments and refinements to the objectives, indicators, thresholds, and response requirements over time.

Section 2.4 of the AMP states that with the QIA's approval of Baffinland's AMP and management plans, that implementation of pre-determined responses to effects as described in the management plan does not require additional approval by the QIA. Baffinland will communicate response actions to QIA prior to implementation unless this is not possible due to the expediency required by the circumstance. If, however, a new response not previously considered is proposed, QIA approval will be sought.

2.5.2 ADAPTIVE MANAGEMENT CHECKLIST

Table 2.2 presents an adaptive management checklist developed for the ICRP, identifying how adaptive management has been incorporated into the current revision of the Plan.

Table 2-2 Incorporation for Adaptive Management in this Plan

Adaptive Management Phases	Components	Questions to Guide Decision-Making	Status of Management Plan (i.e., complete, in progress, undergoing revisions)	Status of QIA and Baffinland Approval
Plan	Objectives	Are objectives clear and key desired outcomes defined? Do	Closure objectives are presented in Section 5.1.1. Inuit objectives are not discussed explicitly, however it is acknowledged that input it	

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 29 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Adaptive Management Phases	Components	Questions to Guide Decision-Making	Status of Management Plan (i.e., complete, in progress, undergoing revisions)	Status of QIA and Baffinland Approval
		they include Inuit objectives?	required to define aesthetic objectives and well as end land use. QIA is to provide this input and is in progress. Short term closure objectives will rely on those developed for the related environmental management plans	
	Indicators	Are performance indicators adequately identified? Do they include Inuit defined indicators?	Closure criteria are presented in Section 5.1.1, which provide context for the indicators, however criteria should be considered as thresholds Inuit defined indicators are not discussed separately, but it is acknowledged that these need to be developed by QIA and receive updates through the MCWG or other engagement on closure objectives and end land use. Short term closure criteria indicators will rely on those developed for the related environmental management plans listed in the Note above.	
	Identification of Thresholds	Are thresholds for specific responses identified (e.g., early warning triggers, action levels, quantitative	Short term closure thresholds will rely on those developed for the related environmental management plans listed in the Note above. Reclamation and closure thresholds that relate to the objectives and criteria listed in	

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 30 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Adaptive Management Phases	Components	Questions to Guide Decision-Making	Status of Management Plan (i.e., complete, in progress, undergoing revisions)	Status of QIA and Baffinland Approval
		metrics or qualitative descriptions)?	Section 5.1 have not be developed. Many of the thresholds for closure (closure criteria) will be refined over the life of mine and through reclamation research programs and engagement activities.	
	IQ Integration / Influence	Are mechanisms for IQ integration/influence identified?	Section 2.4 discusses engagement on closure to date and the development of the Inuit Stewardship Plan in addition to the MCWG to facilitate the integration of inuit perspectives and IQ.	
Implement and Monitor	Management Strategies and Responses	Are management strategies and response options clearly identified?	Management options and methods related to closure and reclamation are described throughout Section 5.2. Management options and methods related to short term closures will rely on those developed for the management described in the Note above.	
	Resourcing	Are all phases of the adaptive management cycle properly resourced (in accordance with Inuit Agreements) to be fully implemented?	Roles and Responsibilities are briefly described in Section 2.3	

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 31 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Adaptive Management Phases	Components	Questions to Guide Decision-Making	Status of Management Plan (i.e., complete, in progress, undergoing revisions)	Status of QIA and Baffinland Approval
	Monitoring	Does the monitoring program provide the information needed to determine the effectiveness of management strategies and responses?	Post closure monitoring is discussed in Section 9. The monitoring programs, similar to those implemented during the operations phase, will assess the effectiveness of the closure strategy to meet the objectives and criteria defined in the ICRP and ultimately the Final Closure and Reclamation Plan.	
	Timeline for implementation	Is the possibility that rapid response may be necessary, taking into account in the implementation plan/process?	Rapid response options for short term closure will be defined in the relevant environmental management plans, as noted above.	
Evaluate and Learn	Review Data and Feedback	Is the process for reviewing and evaluating management effectiveness (based on monitoring data and feedback) articulated?	Section 9 describes the post-closure monitoring and reporting requirements. These are presented as conceptual in nature at this stage of the Project life (initial phased operations). As the project advances a more detailed study design for assessing residual environmental impacts following completion of reclamation activities will be developed.	
	Additional Mitigation	Are mechanisms for determining the need for additional	Management options are described throughout Section 5.2 and Section 7. Mitigation is described at a	

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 32 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Adaptive Management Phases	Components	Questions to Guide Decision-Making	Status of Management Plan (i.e., complete, in progress, undergoing revisions)	Status of QIA and Baffinland Approval
		mitigation described?	conceptual level at this stage of the Project life.	
	Input of IQ Holders	Are opportunities identified for IQ holders to review results and provide input into adaptive management responses / mitigations?	In progress The Inuit Committee established through the Inuit Stewardship Plan, as well as the Mine Closure Working Group, will facilitate the integration of community representation and technical expertise by drawing on Inuit knowledge, arctic experience for similar mining operations, and discussion of alternative uses for decommissioned facilities into the reclamation options for various Project components.	
Adjust	Unanticipated Effects or Issues	Is it apparent how unanticipated effects or issues will be actioned and resolved?	Unanticipated environmental effects or issues are managed through the relevant environmental monitoring and management plans noted above.	
	Reporting	Are reporting mechanisms for new / revised strategies and response actions established?	Section 9 describes the post-closure monitoring and reporting requirements. These are presented as conceptual in nature at this stage of the Project life (initial phased operations). As the project advances a more detailed study design for assessing residual environmental impacts following completion of	

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 33 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Adaptive Management Phases	Components	Questions to Guide Decision-Making	Status of Management Plan (i.e., complete, in progress, undergoing revisions)	Status of QIA and Baffinland Approval
			reclamation activities will be developed.	
	Scheduled Updates	Is the frequency of scheduled updates to the management plan identified?	Section 2.3.1.3 describes when the plan would be updated based on defined criteria.	

2.6 REGULATORY INSTRUMENTS FOR CLOSURE AND RECLAMATION

Baffinland is committed to, and will be responsible for, carrying out the closure and rehabilitation measures in a phased, ongoing (progressive) manner as reviewed and agreed with the Landlord, regulatory agencies and impacted communities.

This current revision of the ICRP has been developed as per the Type “A” Water License 2AM-MRY1325 - Amendment No. 1 Part J, Item 2, in accordance with the *Guidelines for the Closure and Reclamation of Advanced Mineral Exploration and Mine Sites in the Northwest Territories (MVWLB/AANDC, 2013)*; and the *Abandonment and Reclamation Policy for Inuit Owned Lands* (the Qikiqtani Inuit Association-Version 3.0).

Relevant policies, guidelines, and associated regulations that Baffinland will adhere to in the development of this and future revisions to the ICRP are outlined in 3, below.

Table 2.3: Applicable Mine Closure Planning Policies, Guidelines, and Lease Requirements

Title/Year/Agency
Project Certificate No.005 (with associated amendment), 2014, NIRB
Type A Water Licence 2AM-MRY1325 (2013) and Amendment No. 1 (2015), NWB
Commercial Lease No.: Q13C301, 2013, QIA
AANDC Land Lease 47H/16-1-2, 2014, AANDC
Guidelines for the Preparation of an Environmental Impact Statement for Baffinland Iron Mines Corporation's Mary River Project (NIRB File No. 08MN053), 2009, NIRB
Abandonment and Reclamation Policy for Inuit Owned Lands, Qikiqtani Inuit Association, Version 3.0. 2013, QIA

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 34 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Title/Year/Agency
Guidelines for the Closure and Reclamation of Advanced Mineral Exploration and Mine Sites in the Northwest Territories, 2013, MVWLB/AANDC
Mine Site Reclamation Policy for Nunavut, 2002, AANDC
Guidelines for Abandonment and Restoration Planning for Mines in the Northwest Territories, 1990, Northwest Territories Water Board
NWT/Nunavut Mines Health and Safety Act and Regulations, 2005, Government of Nunavut

Appendix F of the Phase 2 Proposal provides a summary of all current and required regulatory approvals, including a brief description of the project activity of concern and scope/expiry date of the applicable permit.

All water crossings identified in the Phase 2 Proposal do not cross navigable waters that are listed in the Schedule to the *Navigation Protection Act*. Consequently, these proposed in-water works do not require Baffinland to make an application or give notice to Transport Canada.

A Glossary of Terms, Acronyms and Abbreviations used throughout this document and the applicable guidelines and regulations can be found in Section 13. Refer to Section 11 for a concordance review of applicable requirements.

2.6.1 ANNUAL SECURITY REVIEW

On an annual basis, in order to account for interim closure and reclamation security adjustments to reflect project development phases until such a time planned closure commences, an updated determination of Project closure and reclamation security is captured through the Annual Security Review (ASR) process should Baffinland not be able to reach its planned closure phase. The ASR process is conducted in accordance with Schedule C of Type “A” Water License 2AM-MRY1325 and Section 9.2 of the Commercial Lease, No. Q13C301, agreed to between Baffinland and the Landlord and includes consultation with landowners and other key stakeholders.

2.6.2 PROJECT UPDATES AND REPORTING

Since 2007, Baffinland has provided annual reports to the Nunavut Impact Review Board (NIRB) summarizing the site work completed, and the work planned for the following year for the activities previously screened and approved by NIRB. These reports also provide a synopsis of compliance performance with explorations licences, permits, approvals and commitments, and include the results of monitoring activities. An update on the existing environmental conditions and progressive reclamation activities are also contained in these reports. The reports are publicly available through NIRB (<http://www.nirb.ca/>) and the Baffinland Document Portal (www.baffinland.com) and results of the monitoring activities described in these annual reports which have an impact or influence on the goals, objectives, criteria, or strategy of the ICRP will be considered in future revisions of the ICRP.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 35 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Appendix C provides site photographs of current conditions onsite.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 36 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

3 PROJECT ENVIRONMENT

A summary description of the atmospheric, bio-physical terrestrial and socio-economic environments at the Project site locations are outlined in the following sections. A comprehensive description of the baseline social, physical, biological and chemical conditions at the Project Location and impact area, with supporting documentation, are presented in Volumes 4 to 8 of the Mary River Project Final Environmental Impact statement (FEIS), and the ERP (Baffinland, 2013), available through the NIRB website (<http://www.nirb.ca/>), as follows:

- Volume 4: Human Environment
- Volume 5: Atmospheric Environment
- Volume 6: Terrestrial Environment
- Volume 7: Freshwater Environment
- Volume 8: Marine Environment

Where additional baseline updates are available from Phase 2 Proposal documents, the documents are referenced below.

3.1 ATMOSPHERIC ENVIRONMENT

3.1.1 CLIMATE

The Project is situated in the Northern Arctic Ecozone. The climate is semi-arid and permafrost coverage is continuous to a depth of 500 metres, with an active layer of up to two (2) metres. Extremely cold temperatures, combined with the permafrost, result in a short period of runoff that typically occurs from June to September. All rivers and creeks, except for the very largest systems, freeze during winter. Due to the combination of low temperatures and low infiltration, vegetative cover is minimal and surface water is abundant. The region is dotted with thousands of small lakes and streams.

The region experiences near 24-hour darkness with less than two hours of twilight from November to January. During the winter months the treeless topography and fine powdery snow produce blowing snow conditions, resulting in restricted visibility. Frost-free conditions occur from late June to late August. There is continuous daylight from May to August. The months of July and August usually experience the greatest precipitation. From September to November, temperature and the number of daylight hours decrease, and by mid-October the mean daily temperature is generally well below 0°C. The highest snowfall typically occurs during this period.

A meteorological baseline report is included in the Mary River FEIS, Appendix 5A, Section 1.1 summarizes the collection of baseline meteorological data at each Project site and incorporates long-term meteorological data from regional Environment Canada (EC) stations. Figure 1 in Appendix 5A Meteorological Report and Meteorological Instrument Report, Volume 5 of the Mary River Project FEIS

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 37 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

shows the regional and project specific meteorological station locations used to complete the climatic assessment to support the development of the Mary River Project.

For additional details on the Project climate conditions refer to the Phase 2 Proposal, TSD-06 Climate Change Assessment; and TSD 07 Atmospheric Assessments.

At present meteorological data at the Project sites is continuously being collected internally. Baffinland are required under their Project Certificate to report on Climate change and provide weather information publicly on Baffinland website.

3.1.1.1 AIR TEMPERATURE

The baseline meteorological report and meteorological instrument report provided in the Mary River FEIS, Volume 5, Appendix 5A, specifically Section 1.3 provides an overview of the mean monthly, annual, and expected project air temperature conditions. Figure 4 in Appendix 5A - Meteorological Report and Meteorological Instrument Report, Volume 5 of the Mary River Project FEIS shows the monthly mean average temperatures for the years 2005 to 2008 for both Environment Canada (EC) and Baffinland meteorological stations. EC climate stations range from approximately -34°C in February at Pond Port to about 7°C in July at Igloolik. The monthly average temperatures at Nanisivik are 0.7 -7.3°C colder than at other stations during summer and fall. Temperatures at Pond Port are 1-5.6°C colder than other stations during winter months.

Data from Pond Port are most representative of temperatures at all three Baffinland stations compared to the other long-term EC stations, although there is a tendency for warmer temperatures at the Baffinland stations during summer. The Pond Port data, corrected upward by 2.4°C during summer, are assumed to be reasonably representative of baseline conditions at Mary River Project site and to provide the best source of long-term temperature information for the Project sites

3.1.1.2 PRECIPITATION

In the Canadian Arctic, precipitation comes in the form of rain, sleet, snow, and ice crystals. The climatic assessment found in Appendix 5A of the Mary River Project FEIS provides a mean monthly and long-term annual precipitation data for meteorological stations. Data indicates that precipitation has increased slightly over the entire measurement period (about 0.24 mm/year). Mean monthly precipitation at long-term ECCC climate stations range from 4 mm in February at Pond Port, Hall Beach and Nanisivik, to about 64 mm in August at Dewar Lakes. Variability in precipitation at the long-term ECCC stations ranges from about 5 mm in January to about 30 mm in August.

Total rainfall was measured at the Project site meteorological stations for months where the mean temperature was typically above 0°C which includes May to October. These months were used to compare the Project-measured precipitation data with measurements from the EC meteorological stations. Mary River had more rainfall in summer than all other Project stations, whereas rainfall in Milne Port and Steensby was mid-low range except for autumn months, when they were higher than at all other stations.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 38 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Based on a comparison of the monthly trends, it appears that the data from Hall Beach are most representative of rainfall in Mary River, and data from Pond Port and Igloolik are most representative of rainfall from Milne Port and Steensby, respectively.

Data from the EC Hall Beach meteorological station was assumed to be reasonably representative of baseline rainfall conditions at the Mary River Project site and to provide the best source of long-term precipitation information. Likewise, an average of precipitation data from Pond Port and Igloolik meteorological stations were assumed to be reasonably representative of baseline conditions at both Milne Port and Steensby Port. Additional details are provided in Section 1.4, Appendix 5A, Volume 5 of the Mary River Project FEIS.

3.1.2 AIR QUALITY

The Project is in a remote location with no existing local sources of air pollutants other than the Project which introduces new, local sources of air contaminants such as particulate matter (TSP, PM₁₀, and PM_{2.5}), nitrogen dioxide (NO₂), sulphur dioxide (SO₂), and carbon monoxide (CO) to the Project area.

In order to identify air quality baseline conditions, Baffinland did some ambient monitoring to assess the background air quality in the areas where project activities would occur. The monitoring results were supplemented with long-term ambient air quality data that exists for other monitoring stations in the north. Parameters monitored for include:

- Total suspended particulate (TSP)
- Inhalable particulate matter (PM₁₀)
- Total particulate deposition (dustfall)
- Sulphur dioxide (SO₂)
- Nitrogen dioxide (NO₂)
- Ozone (O₃)
- Dust deposition
- Metals deposition

Baffinland's 2007 baseline ambient air quality monitoring program had two components: an active and a passive monitoring program:

Active Monitoring Program: Measured ambient concentrations of TSP. Samples were collected simultaneously from two locations near the Mine Site over 72 hours using battery-powered Airmetrics "MiniVol" samplers. Sampling time was increased from 24 hours to ensure adequate capture of particulate and to increase the accuracy of the measurements, as low particulate levels were anticipated. A Dust Track monitored particulate matter with aerodynamic diameters less than 10 µm (i.e., PM₁₀).

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 39 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Passive Sampling Program: Collection of SO₂, NO₂, and O₃ samples simultaneously at two different locations near the Mine Site. Passive monitors (duplicate monitors for each contaminant) were installed at each location for 49 days. This program also involved collection of particulate deposition (dustfall), including metals at the same locations also over the same period. Section 2, Volume 5 of the Mary River Project FEIS, February 2012, identifies existing air quality conditions in the project area and describes potential effects of the Project on air quality.

Summary tables below were extracted from Tables 5-2.1, 5-2.2 and 5-3.3, Section 2.2, Volume 5 of the Mary River Project FEIS provide the baseline air quality conditions for the Project. Additional details on the air quality monitoring program and baseline conditions refer to the Baseline Air Quality Report Appendix 5C-1 of the Mary River Project FEIS.

Table 3.1: Measured Baseline Concentrations

Parameter	Baseline Concentration (µg/m ³)
24-hour TSP	7.0
24-hour PM ₁₀	3.8
30-day SO ₂	0.262
30-day NO ₂	0.188
30-day O ₃	52.8

Table 3.2: Baseline Dustfall Deposition Rates

Parameter	Baseline Deposition Rate (mg/100cm ² /30-day)
Total Dustfall	0.398

Table 3.3: Baseline Metal Deposition Rates for Select Metals

Parameter	Baseline Deposition Rate (µg/100cm ² /30-day)
Al	26.9
Co	0.5
Cr	0.3
Fe	30.6
Mg	23.9
Mn	1.7

Source: Tables 5-2.1, 5-2.2 and 5-2.3, Section 2.2, Mary River FEIS Volume 5

Air quality monitoring conducted since project operation in 2014 has included ambient air quality monitoring of gaseous emissions at the Mine Site and Milne Port, and dust fall monitoring along the Tote Road, at Mine Site and Milne Port. Ambient air quality results to date have indicated that NO₂ and SO₂ continue to meet ambient air quality standards. Dust fall at the Mine Site has generally been within predicted levels; however, at Milne Port dust fall has exceeded predictions near the ore stock piles and near the camp where dust is generated by both traffic and the nearby ore piles. Along the Tote Road, within 30 m and one kilometre on either side of the road, dust fall has shown an increase over predictions. However, outside the one kilometre range the dust fall deposition rates decreased to just at or below

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 40 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

laboratory detection limits, which is within predicted levels. With the Phase 2 Proposal, secondary crushing will be moved from the Mine Site to Milne Port, where it will be enclosed, reducing dust emissions at the Mine Site. Although total dust emissions at Milne Port will increase, additional dust control measures are being taken. Baseline ambient air monitoring was reviewed, and information is supplemented by TSD 07 of the Phase 2 Addendum.

3.1.3 NOISE AND VIBRATION

A detailed noise baseline assessment was conducted in 2007 and provided as Appendix 5D-1 of the Mary River Project FEIS, February 2012. The basic procedure to establish baseline noise levels consisted of:

- Conducting measurements and recording sound levels at Milne Port, the Mine Site, and Steensby Port.
- Validating the data based on the recordings and weather information.
- Calculating the resulting validated sound level data.

Background atmospheric noise levels in remote areas are typically low, ranging from about 25 to 40 dBA, similar to those measured for the Mine Site, Steensby Inlet and Milne Inlet. Table 3.4 below which is a replica of Table 5-3.1 from Volume 5 of the Mary River Project FEIS shows the measured ambient noise values for each site. At these levels, noise would be described as faint.

Table 3.4: Baseline Noise Monitoring Results

Site	Leq (24 h)	Leq (Day, 15h)	Leq (Night, 9h)	Minimum Leq (1 h)	Maximum Leq (1 h)
	(dBA)	(dBA)	(dBA)	(dBA)	(dBA)
Mary River	25	25	26	20	34
Steensby Inlet	29	31	26	23	35
Milne Inlet	30	31	29	21	35

Source: Mary River FEIS, Appendix 5, Table 5-3.1

3.2 PHYSICAL (TERRESTRIAL) ENVIRONMENT

Superficial landforms and deposits in the Mary River Project area are associated with widespread glaciation on Baffin Island. Surface geology consists of locally abundant sediment deposits from glaciers and rivers. Occasional outcrops of granitic and sedimentary rock formations occur. The North Baffin region containing the Mary River area lies within the Committee Belt, a granite-greenstone terrain mixed with sedimentary and volcanic rock. The mountains to the east are older than 540 million years old, and the lowland plateaus to the west are about 250 to 540 million years old.

3.2.1 TOPOGRAPHY

Topography varies considerably across the Project area. The shoreline of Milne Inlet in the northern part of the Project area is situated on a relatively broad, deep and flat sand beach. Milne Inlet itself is enclosed by steep fiord walls measuring 60–600 m above sea level (asl). Moving inland, the Milne Inlet Tote Road follows the Phillip's Creek valley that starts near sea level at Milne Inlet and rises to 188 m asl at the Mine

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 41 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Site. The Phillip's Creek valley is confined by hills or mountains on both sides. West of the Phillip's Creek Valley is mountainous terrain with some occurrence of glaciers.

At the Mine Site, Nulujaak (Deposit No. 1) rises quickly to 679 m asl from the fairly flat and sandy outwash plain where the exploration camp is currently located. Nulujaak is a landmark for Inuit travelling on the land and is part of a ridge trending approximately north–south. The land to the west is equally mountainous with some minor coverage of glaciers. East of Deposit No. 1 the land is somewhat rolling with several elevated plateaus formed by horizontal sedimentary deposits. South of Mary River the undulating outwash plains end near the Ravn River. South of the Ravn River the land is quite flat and poorly drained and begins to drop steeply toward the Cockburn Lake valley, which is bounded by steep cliffs that range from 360–380 m asl. The land south of Cockburn Lake to Steensby Inlet becomes flatter with mainly undulating bedrock and boulder landforms. Figure 6-2.1 - Relief Map of the Northern Baffin Region, found in Section 2.1.1.1. Volume 6 of the Mary River Project FEIS shows the relief across North Baffin Island, and the topography as it relates to Project features starting in the north at Milne Inlet and extending towards Steensby Port in the south.

Additional details on topography can be found in Section 2.1.1.1, Volume 6 of the Mary River FEIS, February 2012.

3.2.2 PERMAFROST

The Project is located in a zone of continuous permafrost which can extend to depths of several hundred metres. Cryosolic soils (i.e., those affected by permafrost-related processes) predominate. The active layer through the Project area typically ranges from approximately 1 to 2 m but may be greater in areas where there is loose, sandy soil at the edges of lakes or ponds and less in areas with a substantial surface layer of wet organics. Unfrozen taliks can exist within areas of continuous permafrost below lakes, under large rivers or near the coast.

Permafrost thickness in and around the RSA is considered to be deep, typically in the 400–700 m depth range. In 2007, a 400 m thermistor installed into Deposit No. 1 showed that the depth to permafrost is predicted to extend to 610 m at this location which is well below the planned depth of mining.

Between 2006 and 2008 more than fifty ground temperature monitoring instruments (thermistor cables) were installed and sporadically monitored to determine typical ground temperatures in the overburden soils and bedrock across the RSA. Many were installed to depths sufficient to define the typical stable temperatures in the permafrost soils below the depth of zero annual amplitude. The depth of zero annual amplitude in temperature fluctuation appears to exist at depths of between 10 and 15 m in the valleys. At that depth, the “typical” permafrost temperature is roughly -10°C. Details on permafrost are described in Section 2.1.1.4, Volume 6, of the Mary River Project FEIS.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 42 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

3.2.3 SURFICIAL AND BEDROCK GEOLOGY

The surficial geology of the area generally consists of locally abundant Holocene glacio-lacustrine sediments, alluvial sediments (alluvial deposits), marine and glacio-marine deltaic sediments and end moraine till, with occasional outcrops of pre-Quaternary bedrock and sedimentary rock formations. Figure 6-2-2 - Surficial Geology in the Regional Study Area (RSA) in Volume 6 of the Mary River FEIS shows the surficial geology of the Project area. This information is supplemented by TSD 08 of the Phase 2 Addendum.

The following sections provide some more specific observations associated with the surficial geology at some of the proposed and existing project infrastructure locations/sites.

Mine Site - The Project is located in a glaciofluvial outwash deposit in what appears to be a classic U-shaped valley. There are some direct glacial deposits consisting of kames, moraines and eskers in and around the southeastern portion of Sheardown Lake. The outwash valley is essentially a relatively flat plane with very little local relief, the primary exceptions being along water bodies, esker deposits and adjacent to valley edges. Valley walls are generally steep and abrupt, often with distinct terraces.

Northern Transportation Corridor - The Northern Transportation Corridor alignment (along the Tote Road and North Railway) generally follows a glacial valley-oriented northwest-southeast to the Mine Site. The surficial deposits along this alignment include till veneer or blankets on the higher elevations with some drumlins and moraines. Glaciofluvial outwash sediments (gravel and sand) forming braided floodplains, terraces and fans or stratified glacial drift (gravel and sand) are typically found in the valley floors. Limited bedrock exposure is present along the Tote Road; however, construction of the North Railway will involve quarrying and cutting through bedrock where necessary. The North Railway will cross a small portion of a large esker located south of David Lake.

Milne Port - The dominant landforms in the Milne Inlet area are typically a result of glacial activity, marine and mechanical forms in various degrees. Glacial activity is not overly apparent on the immediate Port site but is more pronounced in the higher elevations south of the site. Marine and mechanical features are most predominant with terraces and strand (beach) lines formed by marine action which have been cut by mechanical features, some of which may be attributed to permafrost. Wind appears to have been responsible for some drifting on the finer grained soils on the lower part of the site. Recently deposited colluvium is present on many of the slopes and side hills in the area. The action of surface water has produced numerous sharp gullies along water-ways. Marine clays were also noted at some locations at the site.

Southern Transportation Corridor - The topography of the Southern Transportation Corridor from the mine site to the Steensby Port is generally quite hilly, with the exception of the Ravn River area which is relatively flat. Glaciated valleys are evident along a significant portion of the alignment. The surficial geology of the corridor is also characterized by the relatively recent glacial activity of Baffin Island. Surficial geology consists of several types of deposits including glacio-lacustrine sediments, alluvial sediments

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 43 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

(alluvial deposits), end moraine till, and till veneers and blankets. Occasional outcrops of pre-Quaternary bedrock and sedimentary rock formations are also common along the southern section of the RSA.

Steensby Port - Near surface bedrock is dominant in the Steensby Port area. Limited overburden is in the form of marine sediments and localized deposits of till. The majority of the overburden is located in depressions between the numerous bedrock outcrops and is typically overlain by a layer of vegetation and boulders.

For additional details on site specific baseline conditions refer to Section 2.1.1.2 Surficial Geology, Volume 6 of the Mary River Project FEIS.

3.2.3.1 SURFICIAL SOILS COMPOSITION

A soils evaluation was carried out in 2007 and 2008 by an Arctic soils specialist (Veldhuis, 2010). Regionally, soil formation is controlled and limited by year-round low soil temperatures, low precipitation rates and near-surface permafrost. Soil formation occurs in the thin layer overlying the permafrost that is subject to seasonal thawing, known as the active layer. The thickness of the active layer varies substantially across the region with topography, depth to bedrock, and vegetative or water cover but is typically between 1 to 2 m thick in the Project area depending on the local soil cover. In locations where well drained, dry sand and gravels are present, thaw depth can extend to 2 to 4 m depth.

3.2.3.2 BEDROCK GEOLOGY

The baseline information available on bedrock geology in the Project area is based on field geological exploration programs conducted by Baffinland geologists from 2004 to 2008 and summarized by Aker Kvaerner (2008).

The North Baffin Island region and Mary River area lie within the Committee Belt, a granite-greenstone terrane mixed with rift basin sediments and volcanic rocks. The belt lies within the Churchill Province, extending from Baker Lake to Greenland, and is divided into five main assemblages: the Archean, the Mary River Group, the Piling Group, the Bylot Supergroup, and the Turner Cliffs-Ship Formation.

The Mary River iron deposits are located within the Mary River Group, an assemblage of Late-Archean (2.76 to 2.72 Ga) metasedimentary to metavolcanic rocks that have been folded and preserved in greenstone belts. The Mary River Group greenstone belts are present as fragmented remnants stretching from Bylot Island south to Ege Bay. Refer to Figure 6-2.5 – Bedrock Geology in the RSA shown in Volume 6 of the Mary River Project FEIS, Primary sequences within the Group consist of a lower series of metavolcanic rocks and an upper series of turbidite pelitic-greywacke; the stratigraphic position of iron formation, quartzite, conglomerate, minor marble, and volcanic breccia units within the belts, which varies across the region. The Mary River Group is part of the regional Committee Belt, an Archean-aged (2.9 to 2.5 Ga) assemblage of granite-greenstone terranes, granitic migmatites gneissic granitic intrusions, and clastic and carbonate sedimentary units reworked during the Paleo-Proterozoic (2.5 to 1.6 Ga). For

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 44 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

additional details on site specific baseline conditions refer to Section 2.1.2, Volume 6 of the Mary River Project FEIS.

3.2.4 HYDROLOGY AND DRAINAGE

Groundwater flow in the Local Study Area (LSA) consists of seepage through unconsolidated materials within the active layer, which typically ranges from 1 to 2 m (up to 3 m) below surface. This groundwater reports to local surface drainages and lakes. The long period of sub-zero temperatures results in a very short runoff season, typically occurring from June through September. Runoff may extend to late October in systems with large lake components. A Baseline Hydrology Report for the Project is found in Appendix 7A, Volume 7 of the Mary River FEIS.

The key findings within the Baseline Hydrology Report pertain to four main hydrometric parameters: timing of runoff, magnitude of runoff, spatial variability of timing and magnitude of runoff, and long-term runoff estimates. Runoff in the vicinity of the Mary River Project are characterised as follows:

- Streamflow typically commences in early to mid-June as temperatures climb above 0°C, and ends in late September to late October, depending upon watershed characteristics.
- The annual hydrograph is dominated by a nival (snowmelt) freshet, which occurs between late June and the end of July, followed by a period of low baseflows driven by permafrost melt and shallow subsurface flow. Baseflows are punctuated by precipitation events through July to early September.
- Precipitation runoff events are usually quite large and flows increase rapidly as interception, infiltration, and evapotranspiration are minimal due to shallow permafrost, cool temperatures and lack of vegetative cover.

The drainage pathways for the Mary River Project are defined by catchments as shown in the following figures in from Volume 7 of the Mary River Project FEIS. Additional details on drainage can be found in Section 2.0 of Volume 7 of the Mary River Project FEIS.

- Figure 7-1.1 – Freshwater Regional Study Area
- Figure 7-1.2 – Milne Port Local Study Area and Milne Tote Road Local Study Area
- Figure 7-1.3 – Mine Site Local Study Area
- Figure 7-1.4 – Railway Corridor Local Study Area and Steensby Port Local Study Area

3.3 CHEMICAL ENVIRONMENT

3.3.1 SURFICIAL SOIL CHEMISTRY

Project area soils were classified based on the Canadian System of Soil Classification (National Research Council, 1998), and included primarily Cryosols (permanently frozen soils or soils with permafrost within 100–200 cm of soil surface) and Brunisols (soils with weak B horizon development). In general, Project-

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 45 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

area soils all showed weakly developed horizons, with a general lack of organic material accumulation. Fine to medium-textured soil materials were generally cryoturbated, and patterned ground phenomena related to permafrost and freeze-thaw cycling were also commonly observed throughout the RSA. Soils throughout the RSA were generally poor in nutrients (Table 3.5). This factor, in combination with the depressed level of pedogenic development in the area and thinness of soils where present, generally make local soils unsuitable for stockpiling for revegetation purposes (Veldhuis 2010). For further information regarding surficial soils composition, see Section 2.1.1.3, Volume 6, of the Mary River Project FEIS.

Table 3.5: Total Amounts of Organic Matter And Primary Nutrients In Soils in the Project Area

Parameter	Concentration Range per Horizon, %			
	B Horizon (sandy)	C Horizon (sandy)	B and C Horizons (loamy)	A Horizon
Organic Matter	0.83 (0.17 - 2.21)	0.34 (0.17 - 0.51)	2.81 (0.17 - 5.44)	13.72 (2.38 - 26.00)
Nitrogen	0.04 (0.02 - 0.08)	0.03 (0.02 - 0.04)	0.15 (0.012 - 0.36)	0.93 (0.09 - 1.14)
Phosphorous	0.03 (0.01 - 0.09)	0.07 (0.04 - 0.11)	0.04 (0.02 - 0.10)	0.06 (0.06 - 0.11)
Potassium	0.13 (0.05 - 0.36)	0.15 (0.09 - 0.25)	0.47 (0.16 - 0.69)	0.08 (0.06 - 0.11)
Sulphur	< 0.01	< 0.01	0.02 (0.01 - 0.05)	0.06 (0.01 - 0.10)

NOTE(S):

1. FROM VELDHUIS 2010.

3.3.2 SURFACE WATER AND SEDIMENT QUALITY

Freshwater quality measurements in the Mary River area indicate naturally elevated concentrations of dissolved oxygen, turbidity, aluminium, and iron. Some average values for pH, as well as cadmium and mercury in fresh water are greater than levels recommended by the guidelines of Canadian Council of Ministers of the Environment.

A baseline water quality program was carried out over the period of 2005 through 2008 which included up to 74 surface water sampling sites distributed throughout the study area. Three lakes in the vicinity of the Mine Site with the potential to be affected by Project-related components and activities were sampled in 2006 through 2007: Camp Lake, Sheardown Lake and Mary Lake. In 2008, lake water sampling extended to the Steensby Inlet area, the Rail Camp area, and the current railway alignment. A follow-up water and sediment quality monitoring program was carried out in summer 2011 to update the dataset and to obtain water and sediment quality data from candidate long-term water monitoring locations. Sediment samples were collected from various lake, stream, and river locations. The complete water and sediment quality baseline data are provided in the Surface Water and Sediment Baseline Report found in Appendix 7B-1, Volume 7 of the Mary River FEIS.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 46 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Volume 7 of the Mary River FEIS, February 2012 discusses impacts to the Freshwater Environment, including impacts on water quantity, quality and fish habitat. Sections 1 and 2 of Volume 7 describe the baseline hydrologic conditions, potential impacts and mitigation measures and residual effects of activities on the hydrologic system in the Project area. Sections 3 and 4 of Volume 7 include similar content related to water quality and aquatic biota and habitat, respectively.

Water quality monitoring of the mine has demonstrated general compliance with required discharge limits and have not identified project-related effects on water quality in potentially affected waterbodies. Baffinland has generally been in compliance with the discharge limits specified in its Type A Water Licence, with two exceptions, where immediate corrective action was undertaken. Aquatic Effects Monitoring Program monitoring to date has not identified a significant mine-related effect to the nearby aquatic environment. To date, monitoring under the Environmental Effects Monitoring (EEM) Program under Metal and Mining Effluent Regulations (MDMER, formerly the Metal Mining Effluent Regulations) has demonstrated compliance with MDMER requirements (Baffinland, 2017c).

3.3.3 GEOCHEMISTRY

Deposit No.1 occurs at the nose of a syncline plunging steeply to the north-east (Aker Kvaerner, 2008). The iron formation occupies the nose and two limbs of this feature with a -1,300 m long northern portion and a – 700 m long southern portion. For the LOM characterization, waste rock was subdivided based on broad geo-structural categories about the iron ore zone, mainly by hanging wall and footwall zones.

- The iron ore deposits at the Mary River project represent high-grade examples of Algoma-type iron formation and are composed of hematite, magnetite and mixed hematite-magnetite-specular hematite varieties of ore (Aker Kvaerner 2008). The iron deposits consist of a number of lensoidal bodies that vary in their proportions of the main iron oxide minerals and impurity content of sulphur and silica in the ore. The massive hematite ore is the highest grade ore and also has the fewest impurities, which may indicate it was derived from relatively pure magnetite or that chert, quartzite and sulphides were leached and oxidized during alteration of the iron formation.
- The footwall to the iron formation mainly consists of gneiss with minor schist, psammitic gneiss (psammite) and amphibolite. The footwall mainly consists of quartz-feldspar-mica gneiss with lesser meta-sediment (greywacke) and quartz-mica schist. Microcline and albite are the predominant feldspars within the gneiss and biotite is generally more abundant than muscovite.
- The hanging wall is primarily composed of schist and volcanic tuft with lesser amphibolite and metasediment. The hanging wall primarily encompasses chlorite--actinolite schist and garnetiferous amphibolites. Metavolcanic tufts are also a significant lithology identified in the hanging wall.

Metal leaching and acid rock drainage (ML/ARD) characterization studies in support of the LOM pit waste rock are provided in the report entitled "Mine Rock ML/ARD Characterization Report Deposit 1, Mary River Project", March 2014 as appended to the LOM Waste Rock Management Plan. Additional

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 47 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

investigations have been completed specifically for the 5-year open pit and in response to observed acidic conditions within the current waste rock pile (AMEC 2014 and AMEC 2017).

A total of 776 Acid-base Accounting (ABA) samples and 376 minerology samples were selected to provide representative samples of the waste rock categories and broad spatial coverage of non-ore mine rock in the vicinity of the LOM open pit development. All 776 ABA samples were analyzed for modified Sobek acid base accounting (ABA), NAG, pH, and elemental content. Subsets of drill core samples were also analyzed for downhole variability, NAG leachate, short-term metal leaching, whole rock elemental content, detailed mineralogical analysis, and long-term kinetic testing.

Results of ABA testing from the Life of Mine (LOM) characterization determined that waste rock is generally characterized as having low neutralization potentials (NP) and low acid potentials (AP). Data suggests that the waste rock is dominated by noncarbonate sources of NP (e.g. silicates) with lesser NP derived from carbonate sources. Sulphide was the primary form of sulphur; however, further review of the geochemical database notes that sulphates may also contribute to total sulphur contents.

- Approximately 85% of waste rock samples had neutralization potential ratios (NPR) greater than 2 and are classified as non-potentially acid generating (Non-PAG) and are unlikely to generate acidic drainage.
- Approximately 10% of the samples had NPR values of less than 1.
- Approximately 5% of the samples were classified as having uncertain acid generating potential ($1 < \text{NPR} < 2$).

Extrapolating these results to the project waste rock model, indicates that approximately 11% of the LOM in-pit waste rock is expected to have $\text{NPR} < 2$ and is considered potentially acid generating (PAG). Proximity to ore appears to correlate to increased PAG quantities (defined as $\text{NPR} < 2$) with the hanging wall schist (HWS) and footwall schist (FWS) zones identified with the greatest proportion of PAG of the major waste units. The proportion of LOM PAG waste rock was estimated to be 14% as part of the baseline studies and FEIS, representing a larger proportion than current projections.

Ten (10) waste rock samples were run in humidity cells for 53 weeks in 2008 and 2009. A further 17 waste rock samples were initiated in humidity cell tests in May 2011 for between 109 and 120 weeks of reported data. Nine (9) of these samples were standard humidity cells and eight (8) were NP depleted humidity cells designed to assess drainage quality in the absence of carbonate NP.

The pH of most cells was in the range of 5.5 to 7 throughout testing. Of the 17 cells in operation since 2011, three cells exhibited slowly declining pH throughout testing reaching a minimum measured weakly acidic pH of between 4.5 and 5 after approximately two (2) years of operation (under laboratory conditions). Selected humidity cell tests are planned to continue. Kinetic testing results and cold climate

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 48 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

conditions at site suggest the lag time to acid on-set in PAG rock would be on the order of five (5) years or longer.

Total sulphide content of samples is weakly correlated with sulphate release rates; however, through the current periods of testing metal release rates and trends vary among the cells. Though metal release rates are generally low in most cells, release rates are the highest in the lower pH humidity cells with notable release rates for cadmium, cobalt, copper, nickel, lead and zinc in two (2) cells which also contain near worst case solid concentrations for these metals in Deposit 1 mine rock.

Water quality of the Waste Rock Stockpile runoff and discharge from the Waste Rock Stockpile pond(s) will be used as key environmental performance indicators. Conductivity, pH and sulphate will be used as early-warning indicators to identify potential acid generation in the pile. Ammonia and nitrate will be monitored to inform the effects of remaining explosive residue on the water quality of WRF runoff.

Water quality of effluent discharges from the waste rock surface water management pond(s) will be compared to the water quality criteria outlined in the Type A Water Licence and MDMER and used to inform and implement adaptive management actions as required.

3.4 BIOLOGICAL ENVIRONMENT

3.4.1 VEGETATION

Existing knowledge of the North Baffin region with respect to vegetation describes the area as having a harsh climate, high winds and shallow soils result in sparse and dwarfed plant life. Herb- and lichen-dominated communities constitute the main vegetative cover. The latter is closely associated with the rock fields and hilly upland areas. Common herbs are purple saxifrage, mountain avens, and arctic poppy, often mixed with shrubs such as arctic willow. The size of shrubs decreases rapidly as one moves north. Vegetative cover tends to be greater on wetter sites confined to coastal lowlands, sheltered valleys and moist nutrient-rich corridors along streams and rivers. Baseline studies of the Mary River Project area were conducted during each of the summers of 2005 through 2008. A total of 833 plots were surveyed across the terrestrial RSA, focusing mainly on the Potential Development Areas (PDA). A total of 155 vascular plant species were recorded, a vegetation classification system was developed, and a species list was compiled. In addition to vegetation surveys, there was particular emphasis on establishing baseline levels of different metals and elements of the area prior to project development. Results for of the Vegetation Baseline Report for the project, including selected metals in plant species foliage are summarized and detailed in the Vegetation Baseline Report, Appendix 6C, Volume 6 of the Mary River Project FEIS, February 2012. Figure 2 –Terrestrial Regional Study Area showing Vegetation plot locations found in Appendix 6C of the Mary River FEIS shows the vegetation plot locations in the regional study area.

The vegetation abundance monitoring program to date has indicated no evidence of changes in vegetation abundance in the Project area from 2014 to 2017 as a result of the Project. There is annual

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 49 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

variation in the cover of some plant groups in the Project area; however, these differences were found across all plots; therefore, the variation is attributed to natural variation in plant group cover and there is no evidence to support a Project-related effect in the first three (3) years of monitoring. Metals analysis of soil and vegetation was conducted from 2012 to 2016; all results have been within the expected range and below Project-specific thresholds, following the resampling of two stations in 2017 that were confirmed to be outliers.

3.4.2 AQUATIC WILDLIFE

A freshwater aquatic baseline study was completed for the Project from 2005 and 2011. The results of this report are presented in Appendix 7C, Volume 7 of the Mary River FEIS, February 2012 and summarized at a high level in the sections below.

There are two key fish species in the freshwater environment: Arctic char (*Salvelinus alpinus*) and a minnow species named nine-spine stickleback (*Pungitius pungitius*). While both are generally abundant and widespread in distribution, ninespine stickleback are absent from the freshwater lakes and streams that were surveyed near the Milne Inlet coast. As all streams with the possible exception of large rivers freeze solid in winter, lakes provide the only overwintering habitat for both species and spawning habitat for Arctic char across the study areas. Many streams provide rearing and foraging habitat and potential protection from predators for juvenile Arctic char. Most of the drainage basins that support Arctic char either contain barriers preventing anadromous migrations and/or are distant from the coast and most populations in the five study areas are land-locked. Nearshore zones of larger lakes also provide rearing and foraging habitat and potential protection from predators for juvenile Arctic char, foraging and, in some cases, spawning habitat for adult Arctic char, and overwintering habitat for all life stages. Arctic char feed primarily on benthic invertebrates, although cannibalism occurs in a small proportion of at least some populations.

Mercury concentrations in Arctic char muscle exceeded guidelines for human consumption in some fish captured in the Mine Area, although concentrations were similar to those reported for other landlocked Arctic char populations. In general, the lower trophic level communities are similar to other areas of the Canadian Arctic. As is typical of Arctic ecosystems, the freshwater environment is relatively nutrient-poor and primary productivity is relatively low. In general, Arctic freshwater ecosystems are characterized by relatively low diversity of zooplankton communities due to low temperatures and nutrients; results of the baseline studies for Mine Area lakes are consistent with this generalization. The benthic invertebrate communities in the Mine Area are generally moderately diverse, although higher diversity is found in some small tributaries, and are dominated by chironomids.

Figures 7-4.2, 7-4.4, and 7-4.8 (FEIS Section 4.5) show the distribution of Arctic char in fresh water at the Project sites.

Monitoring results to 2017 has identified impacts within the FEIS predictions, where FEIS predictions are exceeded, adaptive management is being applied to mitigate observed effects. At the Mine Site, while

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 50 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

lake sedimentation rates in Sheardown Lake NW in 2016 and 2017 were greater than baseline, they remained within the range predicted in the FEIS, and monitoring of the biological communities (i.e., phytoplankton, benthic macroinvertebrates, and Arctic Char) conducted during the first three years of operation (2015-2017) indicated that there were no adverse mine-related influences on the biota of the Mine Site waterbodies and watercourses (Minnow Environmental Inc. 2016, 2017). Some issues regarding fish passage and condition of stream crossings along the Tote Road have been noted in the annual surveys conducted since 2009; as a result, Baffinland has implemented various mitigation measures to correct issues identified and will apply experience gained and lessons learned to the planning and design of the proposed North Railway watercourse crossings.

3.4.3 TERRESTRIAL WILDLIFE

Terrestrial wildlife on north Baffin Island (described in the Mary River Project FEIS, Volume 6, Appendix 6F - Terrestrial Wildlife Baseline Report) includes caribou, wolves, foxes, Arctic hares, ermine, and small mammals. Terrestrial wildlife, caribou in particular, are an important part of the Inuit culture and are an important component of a subsistence lifestyle. Occurrence of most wildlife species on north Baffin Island is relatively sparse.

3.4.3.1 CARIBOU

A key terrestrial wildlife species (to both humans and within the broader ecology) is the North Baffin Island caribou. They currently occur in low densities and their abundance seems to be cyclical – harvest data and Inuit Qaujimajatuqangit (IQ – Inuit Knowledge) suggests a roughly 60- to 70-year cycle of abundance. The cyclical pattern of caribou abundance is similar to patterns described on Greenland and south Baffin Island. The cause of these changes in abundance is currently unknown. The last period of caribou abundance in the regional study area (RSA) was 1980 to 2000. According to IQ, and trail orientation and abundance, movement will predominantly be east-west and will occur within the southern half of the RSA. Caribou numbers are expected to gradually increase in the Mary River Region, but might not recover to historical highs until the 2050s. There is evidence that caribou occur, and have historically occurred, throughout the entire region and, therefore, use most of the RSA as some form of habitat. The most-used habitat is in the southern and central portion of the RSA, as indicated by caribou sign (bones, antlers, tracks, and trails) and IQ. Trails observed along the proposed railway alignment suggest that some areas are better for movement. Analyses of habitat use show a greater probability of caribou occurrence for some habitats during the calving, growing, and winter seasons, but the probability of occurrence of caribou is relatively equal in many locations throughout the Project area. The caribou that currently occupy the RSA are not migratory. The local caribou on average move less than 4 km per day during all seasons with very few focused directional movements and all movements were at the scale of tens of kilometres — most caribou remained within the areas they were collared. Additional details on Caribou populations are summarized in Section 5 and Appendix 6F- Terrestrial Baseline Report of the Mary River FEIS.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 51 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

The Terrestrial baseline report found in Appendix 6F of the Mary River FEIS is the most extensive and thorough summary of north Baffin Island caribou currently in existence. It summarizes and synthesizes the history of government surveys, local harvest, IQ, habitat use, and terrestrial wildlife surveys funded by Baffinland, and is one of the most in-depth analyses of caribou habitat selection completed in Nunavut.

In June 2013, a group of five caribou was observed in the PDA during height of land surveys; however, caribou have not been observed during surveys conducted between 2014 and 2017. Lack of caribou observations on site follows the trends of low numbers recorded in regional observations. Low numbers of incidental observations of caribou between the mine site and Milne Inlet between 2013 and 2017 also coincide with the lack of caribou observations during the height of land surveys.

3.4.3.2 MARINE AND TERRESTRIAL BIRD COMMUNITIES

The marine and terrestrial bird communities of north Baffin Island are described in the Bird Baseline Report found in Appendix 6E, Volume 6 of the Mary River FEIS.

Field surveys in the Project Area documented 54 bird species within the marine and terrestrial RSAs, five of them Species at Risk listed by COSEWIC (2010) or SARA (Environment Canada, SARA 2010) as identified during the time of baseline programs, including Peregrine Falcon, Short-eared Owl (documented within the terrestrial RSA but showing no signs of nesting there), and Ivory Gull, Ross's Gull and Harlequin Duck (all detected within the marine RSA, but no nesting sites were located). One additional Species at Risk, the Red Knot, has the potential to be found within the Project Area, but was not detected during baseline surveys.

Staging and breeding areas are found in the Project Area for numerous species of birds including Snow Geese, Common and King Eiders, Brant, and Long-tailed Ducks, and include a known moulting area for Snow Geese prior to fall migration. Twenty-five species were confirmed to breed throughout the marine and terrestrial study area. No large, conspicuous seabird nesting colonies were recorded during Project surveys; however, several are known to exist within and adjacent to the marine RSA, particularly on Bylot Island, in Foxe Basin, and along Hudson Strait. Marine surveys did locate a large breeding colony of Snow Geese (>5,000 individuals) on the southwestern shores of Steensby Inlet.

IQ surveys conducted in the surrounding communities indicated that the marine and terrestrial habitat contains several areas that are used seasonally by large numbers of various bird species. Community Elders indicated that most bird species in the area are migratory and typically arrive in late-April, May, and June, and start leaving in August. Breeding occurs throughout the area: most of the islands within the RSA are used as nesting grounds by various species of seabirds, gulls, terns and waterfowl, and some large colonies of seabirds and gulls are known along cliff habitats. Species such as geese, eiders, loons and ducks can be found nesting along coastlines or inland along freshwater lakes. Fall migration occurs between early August to late October depending on the species and the sex. Some birds, such as Common Raven, ptarmigan, and sometimes Snowy Owl, winter in the area, and some seabirds, such as Black Guillemot, also remain in the area year-round using the open shore leads in the winter.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 52 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Pre-clearing nest surveys in 2017 prior to development in expanded project footprint areas were conducted; no nests were identified within the new disturbance area. The addition of the 2017 results of the cliff-nesting raptor survey has indicated no evidence of a relationship between distance from the road/PDA and the number of birds observed. There has been no effect on cliff-nesting raptor nest occupancy rates since 2011, and distance to disturbance analysis suggests there is no negative effect on monitored raptor nesting productivity. Although annual variation in productivity for peregrine falcons and rough-legged hawks is apparent, it is most likely representative of natural variability associated with variation in prey availability and weather rather than due to any influence of disturbance.

3.4.3.3 WOLVES AND FOXES

Wolves and foxes are the dominant carnivores in the RSA and exist at low densities throughout the RSA. Very little information was collected on these midsize carnivores because they were so rarely observed. Fewer than 100 wolf and fox observations were recorded during extensive baseline surveys from 2006–2010. Information in published journal articles was supplemented with anecdotal and IQ information specific to the Project area for this baseline. Carnivore populations are tied to fluctuating prey densities (e.g., caribou and lemmings). Occurrence of carnivores might increase in the area if caribou populations return in large numbers. Additional details on midsize carnivores in the Project area can be found in Section 2.3, Appendix 6F-Terrestrial Wildlife Baseline Report of the Mary River Project FEIS.

Lemming and Arctic Hare, Lemmings are a key prey species in Arctic ecosystems. Their abundance affects the behaviour, habitat use, and population dynamics of carnivores such as Arctic fox, red fox, wolf, Snowy Owls, and falcons. Lemming populations are considered Secure in Nunavut. Populations typically undergo large regular fluctuations in population size (every three to four years). Refer to Section 2.3, Appendix 6 F of the Mary River Project FEIS, February 2012 Arctic hare are a lagomorph found in treeless regions across North America and Greenland. They are restricted to mountains, tundra, and coastal barrens due to their apparent inability to use food resources in forested areas). They may occur in groups of 10–60, or up to thousands on Arctic islands the current population status of Arctic hare in Nunavut is classified as Secure by CESSC. In northern Baffin Island Arctic hare are locally abundant. Additional details on small prey mammals in Baffin Island can be found in Section 2.3, Appendix 6F-Terrestrial Wildlife Baseline Report of the Mary River Project FEIS.

No caribou, wolf or other large mammal tracks were observed during snow tracking surveys conducted between 2014 and 2017; however, similar numbers of Arctic fox and Arctic hare tracks were observed throughout all survey years.

3.4.4 MARINE WILDLIFE

The Mary River FEIS, Volume 8, Section 5.0 and Appendix 8A presents the marine baseline information for the Project area. In total twenty-two marine mammal species are known or expected to occur in the identified Regional Study Area (RSA) including the proposed shipping routes in Baffin Bay and Davis Strait. Species accounts are provided for all species; however, emphasis is placed on species which regularly

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 53 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

occur within the Regional Study A. Only one mysticete or baleen whale species, the bowhead whale (*Balaena mysticetus*), occurs regularly in the RSA. Narwhal (*Monodon monoceros*) and beluga (*Delphinapterus leucas*) are abundant in the RSA; other Odontocetes that occur (albeit in low numbers) in the RSA include killer whales (*Orcinus orca*) and northern bottlenose whales (*Hyperoodon ampullatus*). Pinniped species which occur regularly in the RSA include ringed seal (*Pusa hispida*), bearded seal (*Erignathus barbatus*), harp seal (*Pagophilus groenlandicus*), and walrus (*Odobenus rosmarus*). Polar bears (*Ursus maritimus*) also occur throughout the RSA. For graphical representation in the RSA of which communities hunt which species of marine animals where, see Figure 3.8 – Land Use Information from DIAND (1982B) and Figure 3.9 – Wildlife Distribution found in Volume 4 of the Mary River Project FEIS.

Marine wildlife in the north Baffin Island (described in the Mary River Project FEIS, Volume 8, Marine Section 5) includes bowhead whale, beluga whale, narwhal, walrus, ringed seals, bearded seals, harp seals, and polar bears. TSD 20 of the Phase 2 Proposal, provides additional detail on local currents, waves, and sediment transport within Milne Inlet.

3.4.4.1 BOWHEAD WHALE

Bowhead whales occur seasonally in the RSA and are typically found alone or in small groups. Bowheads are adapted to living in areas of heavy unconsolidated ice and can navigate extensive distances under ice although they are capable of breaking up to 20 cm of ice in order to breathe. Feeding and calving usually takes place in nearshore, sheltered, shallow waters in summer. During open-water periods bowhead distribution is likely driven by the distribution of the various prey species. Bowheads are baleen whales (filter feeders), eating pelagic crustaceans as well as epibenthic invertebrates. Traditionally, bowheads have been observed feeding along the floe edge and their presence is often dependent on the tides. There are four recognized bowhead stocks, one of which (the Eastern Canada-West Greenland stock) occurs within the RSA. This stock ranges throughout the eastern and central northern Arctic and from northern Baffin Bay to Hudson Strait. Bowhead whales within Davis Strait and Baffin Bay were commercially overexploited in the early 1900's, reduced from an estimated 11,800 whales to perhaps as low as 1,000. The stock has shown a significant recovery in recent decades and may now number greater than 14,000.

Along the proposed northern shipping route, bowhead whales occur during summer and fall. They may summer along the east coast of Baffin Island, or move westward through Lancaster Sound during June and July to feed and nurse calves in inlets and sounds within the Canadian arctic archipelago. The IQ suggests that the number of bowheads using Eclipse Sound appears to be increasing in recent years. It is thought that fall migrants wintering in Davis Strait follow the east coast of Baffin Island south to wintering areas, whereas whales that winter along the west coast of Greenland may cross north Baffin Bay and then move south.

The number of bowheads within the Foxe Basin-Hudson Bay region is estimated to be over 2,000. Bowheads congregate to feed and nurse calves in spring and summer around Southampton Island, along the western Hudson Bay coast, and in a relatively small area in northern Foxe Basin between Igloolik and

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 54 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Fury and Hecla Strait. The IQ indicates that bowheads observed near Hall Beach in spring migrate from southern Foxe Basin. Migrations are not well documented, though most movement is thought to take place through the western and central portion of Foxe Basin and may be influenced by ice cover. During summer, this species tends to select areas of high ice cover, presumably to reduce the risk of predation by killer whales. Northern Hudson Bay, Foxe Basin, and Admiralty Inlet have been identified as summering areas, with whales moving farther into inlets and bays as the ice breaks up. In summer months, bowhead whales north of Igloolik consist primarily of juveniles and females with calves, suggesting that this location is a nursing area. Aerial surveys of the Foxe Basin area identified small numbers of bowheads in northwest Foxe Basin but not Steensby Inlet.

Hudson Strait has been identified as a primary wintering area for bowhead whales. Bowheads begin winter migrations in October as the sea ice begins to form, heading south towards northeastern Hudson Bay and Hudson Strait. In 1981, over 1,300 bowheads were estimated in Hudson Strait and were observed during aerial surveys. Additional details on Bowhead Whales can be found in Section 5.1.5 Volume 8 of the Mary River FEIS.

3.4.4.2 BELUGA WHALE

Beluga whales have a circumpolar distribution and occur seasonally within the RSA. They are opportunistic feeders, consuming a wide array of fish and invertebrates. Mating is thought to peak prior to mid-April with calving likely occurring in offshore areas during late spring migration. A limited amount of calving may also occur near estuaries and bays that is supported by IQ indicating that Koluktoo Bay and the southern portion of Milne and Navy Board inlets may be calving areas.

Four of the seven recognized populations in Canada occur in the RSA, including the Eastern High Arctic-Baffin Bay, Western Hudson Bay, Eastern Hudson Bay population, and Ungava Bay populations. The Eastern High Arctic Baffin Bay population (estimated at >20,000) summers in the Canadian Arctic archipelago and winters in the loose pack ice of two distinct areas; along the west coast of Greenland and in the North Water Polynya in northern Baffin Bay. Beluga from the smaller population wintering in the North Water begin entering Lancaster Sound in late April or early May with peak movements occurring in late June to July depending on ice conditions. Belugas wintering off the west coast of Greenland generally occupy similar geographic areas between years. Large numbers from the Eastern High Arctic Baffin Bay population migrate past Bylot Island during spring on their way to summering areas concentrated near Somerset Island. Only a small number of animals move into areas inland of Bylot Island, ostensibly for calving and feeding. Eastward fall migrations begin in September, and are concentrated almost exclusively along the southern coast of Devon Island. Belugas were observed in Eclipse Sound, Eskimo Inlet, Koluktoo Bay, Milne Inlet, and White Bay during aerial surveys.

All four populations of beluga in the RSA are known or expected to occur along or in the vicinity of the southern shipping route. Beluga from the Eastern High Arctic Baffin Bay population enter into northern

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 55 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Foxe Basin during spring and remain in the general area of eastern Fury and Hecla Strait throughout the summer. These beluga typically remain in shallower waters where feeding is thought to occur.

The Western Hudson Bay and Eastern Hudson Bay populations occur in the southern shipping route waters from late October through April when the whales are in their wintering grounds, and during fall migrations from summering areas in late September and October. Beluga whales from both populations occur in the vicinity of Igloolik, Hall Beach, and likely Steensby Inlet during July to early September. The very small (possibly extirpated) Ungava Bay beluga population possibly occur year-round within the RSA. The most recent population estimate for the Western Hudson Bay population is about 57,000. The Eastern Hudson Bay population has been in decline.

The wintering location of the Western Hudson Bay beluga population has not been confirmed but it is thought to be primarily in Hudson Strait. Spring migration to summering areas occurs during late April to May. The majority of animals likely follow the eastern coast of Hudson Bay south to the Belcher Islands, and then across through the pack ice to the Manitoba coast in late May and early June. A small number move westwards towards Southampton Island. Belugas generally remain within estuaries along the coast and in September begin a northward migration towards Southampton Island.

Based on aerial survey results, beluga whales were widespread in Steensby Inlet, Foxe Basin and Hudson Strait but abundance varied with location and month. Additional details on Beluga Whales can be found in Section 5.1.3. Volume 8 of the Mary River FEIS.

3.4.4.3 NARWHAL

Narwhals generally inhabit deep arctic waters of Baffin Bay, the eastern Canadian Arctic, and the Greenland Sea but are seldom found south of 61°. Their diet is thought to be similar to that of beluga, consisting primarily of small cod, flatfish such as Greenland halibut, squid, and other small fish and invertebrates.

Narwhals prefer coastal areas that provide deep water and protection from the wind during summer. They appear to favour deep fjords and the continental slope during winter, in areas where water depths are 1,000 to 1,500 m and marine water upwelling increases biological productivity. Narwhals are highly social animals and can be found in small numbers groups of hundreds or thousands during migration. Based largely on summer distributions, two tentative populations of narwhal occur in Canadian waters; the Hudson Bay population and the Baffin Bay population. However, narwhals are currently assessed as a single population in the eastern Arctic. Narwhals occur throughout the northern shipping route year-round but are found in the RSA primarily during the open-water period. Those that winter in Baffin Bay typically summer in the eastern Canadian Arctic, moving to summering areas in Melville Bay, Eclipse Sound, Smith Sound, and beyond Lancaster Sound. Important summering areas identified within Baffin Bay include Eclipse Sound, Inglefield Bredning, and Smith Sound-Kane Basin.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 56 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Recent estimates indicate that approximately 45,000 narwhal summer around Somerset Island, while over 27,000 inhabit waters in the Prince Regent and Gulf of Boothia area, with approximately 20,000 in the Eclipse Sound area, 10,000 in the East Baffin Island fjord areas, and 5,000 in Admiralty Inlet. Survey results from the late 1980's and early 1990's indicated that summer distribution of narwhal within Eclipse Sound, Milne Inlet, Koluktoo Bay, and Tremblay Sound is influenced by presence and distribution of ice and killer whales.

Narwhals begin to migrate out of their summering areas in groups of a few hundred to several thousand just before freeze-up begins in late September. Those summering near Somerset Island enter Baffin Bay north of Bylot Island in mid to late October. Populations summering in Pond Inlet begin migrating down the east coast of Baffin Island in late September. Narwhals generally arrive in their wintering areas in November. The Baffin Bay narwhal population winters at two discrete areas in the pack ice in central Baffin Bay, and in polynyas at the north end of Baffin Bay.

Narwhals were identified in aerial surveys throughout in Eclipse Sound, Milne Inlet, and Koluktoo Bay. Narwhale observed during a typical survey often numbered in the thousands. Narwhals were also frequently seen in Tremblay Sound and White Bay. Aerial surveys documented fine scale movements of large groups of narwhal between various areas of Eclipse Sound and surrounding fjords.

A much smaller number of narwhal inhabit waters along the southern shipping route. The Hudson Bay population was estimated to be almost 2,000 in the year 2000, though it may be as many as 3,500 during summer months. The timing and routes of migration used by the Hudson Bay narwhal population are less understood than those of the Baffin Bay population. This population is thought to winter in eastern Hudson Strait and move towards summering areas located primarily in the Repulse Bay area north of Southampton Island during late June while some may move north towards Fury and Hecla Strait, in the vicinity of Igloodik.

Fall migrations to Hudson Strait begin in late August or early September, depending on ice conditions. A small number of narwhals that winter in Baffin Bay are thought to move through Fury and Hecla Strait into northern Foxe Basin during spring migrations in April and May.

Aerial surveys confirmed that narwhal occur in relatively low numbers in Foxe Basin; there were no sightings in Steensby Inlet. Narwhal were most abundant in Hudson Strait during April and June surveys when a small number of individuals were recorded. Additional details on Narwhal can be found in Section 5.1.4, Volume 8 of the Mary River FEIS. No significant change in overall narwhal abundance and distribution was observed in the area from 2014-2017.

3.4.4.4 WALRUS

Walrus have a discontinuous circumpolar distribution and are migratory, moving with the ice. They winter in the offshore pack ice of Davis Strait and along the west coast of Greenland, the North Water Polynya off eastern Devon Island and northern Labrador, as well as in Foxe Basin ranging from the floe edge along

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 57 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

the north side of Rowley Island and south to the Melville Peninsula. Walrus are primarily benthic feeders on bivalve molluscs and other invertebrates, and are generally confined to shallow coastal waters up to 100 m.

Four extant stocks occur within Canadian waters however these may be further subdivided. Three of the four identified stocks occur within the confines of the RSA; the Baffin Bay (High Arctic) population, the Foxe Basin population, and the North Hudson Bay-Davis Strait population.

The Baffin Bay walrus population is estimated between 1,700 and 3,000 individuals with summering populations in Kane Basin, Buchanan and Princess Marie bays, Jones Sound, eastern Ellesmere Island, and the Lancaster Sound-Barrow Strait area. Walrus along the northern shipping route winter in the North Water and other polynyas among the Canadian Arctic islands, inhabiting northwest Baffin Bay north from Pond Inlet to Kane Basin, Lancaster Sound, Barrow Strait, and Jones Sound. They are also distributed along the west coast of Greenland. Walrus move westward along the southern coast of Devon Island during spring to summering areas in the Canadian Arctic islands. Only a few individuals are now observed among the inlets and fjords south of Bylot Island. Aerial surveys within the vicinity of Eclipse Sound recorded two walrus; one in Eclipse Sound and one in Milne Inlet.

Walrus are considerably more abundant along the southern shipping route. They are year-round residents in northern Foxe Basin, overwintering in small polynyas and shore lead systems near the outlet of Fury and Hecla Strait, to the east of Hall Beach, and among the islands (Rowley, Koch, and the Spicer Islands) located farther to the east of Hall Beach and south of Steensby Inlet. Their distribution appears to be driven by ice and open-water conditions during winter. During the open water period, they move onto beaches and coasts among the islands south of Steensby Inlet and onto drifting pans of ice. Walrus have been observed within Steensby Inlet during late summer, but the degree to which they use other locations within Steensby Inlet is uncertain. The Foxe Basin walrus population is estimated to be approximately 5,500.

Walrus were abundant within northern Foxe Basin portion of the aerial survey route in 2006. They were observed in pack ice or open water with walrus densities in northwest Foxe Basin estimated at about seven times higher than those observed in northeast Foxe Basin or southern Foxe Basin. During the aerial surveys, two terrestrial walrus haulout sites were observed, one at Manning Islands (mid-way between Hall Beach and Spicer Islands) and the other at Bushnan Rock (a small sandy islet west of the gap between Rowley and Koch Islands). Walrus densities in Hudson Strait were lower than any observed in Foxe Basin. Additional details on Walrus can be found in Section 5.1.2, Volume 8 of the Mary River FEIS.

3.4.4.5 RINGED SEAL

The ringed seal is an important element of the Arctic marine system, both as main prey of polar bears, and as a major consumer of marine fish and invertebrates. Ringed seals occur year-round along both proposed shipping routes and in the vicinity of both proposed port sites and are a major traditional food source for the Inuit.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 58 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Ringed seals establish a series of breathing holes and subnivean lairs, with many of these structures created shortly after fall freeze up. Birth lairs are constructed on the landfast ice in mid-March and pups are born in April. Landfast ice is preferred for breeding rather than pack ice. The population of ringed seals in the Canadian Arctic is estimated to be at least a few million.

Ringed seals are common throughout Baffin Bay as well as along the length of West Greenland. During winter and spring, ringed seals concentrate on stable shorefast ice, though in areas where fast ice is limited, as in Baffin Bay, increased numbers may occupy offshore pack ice. As ice breaks up during summer, they disperse as solitary animals or small groups throughout open-water areas or to coastal. Though ringed seals were originally thought to remain in the same general region throughout the year recent evidence suggests that some members of the population, particularly juveniles, may undertake extensive seasonal movements.

Ringed seals are abundant and have been observed throughout along the proposed northern shipping route, occurring throughout Baffin Bay and Davis Strait, Eclipse Sound, Koluktoo Bay, Navy Board and Pond Inlet.

Ringed seals are abundant along the proposed southern shipping route, occurring throughout Foxe Basin, including the landfast ice of Steensby Inlet and Hudson Strait. Southern Steensby Inlet, Igloolik, Hall Beach, Murray Maxwell Bay, and Rowley Island into Fury and Hecla Strait have been described as important hunting and/or pupping areas for ringed seal. Additional details on Ringed Seal can be found in Section 5.1.1, Volume 8 of the Mary River FEIS.

3.4.4.6 BEARDED SEALS

The bearded seal has a patchy circumpolar distribution as far north as 85°N. There is no reliable abundance estimate for bearded seals in Canadian waters; however, some have suggested an estimate of >190,000.

Bearded seals typically occur alone or in small groups. Whelping occurs between late April and early May, and pups are typically born on unstable pack ice where they are weaned after 12-18 days. Bearded seals eat a wide variety of foods and are generally considered to be benthic feeders that prey on an array of benthic invertebrates and fish, although pelagic fish are also a food source.

Bearded seal distribution is largely determined by the presence of shallow water but they usually move into areas of open water <200 m deep when the pack ice retreats, while some individuals associate with ice year-round. They are seldom found in fast ice areas, but are widely dispersed in open water areas of pack ice where leads and cracks are frequent, and where ice pans are sufficient for haul out sites.

Bearded seals are considered common in the RSA. Large numbers of bearded seals occur around north eastern Baffin Island and in Lancaster Sound. The many polynyas of northern Foxe Basin support several colonies of bearded seals and is thought to be an area of high density for bearded seals.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 59 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

During aerial surveys in support of the Project, bearded seals were present in all areas of Foxe Basin and Hudson Strait, and most sightings occurred from April to August 2008 when they are easily observed basking on sea ice. During aerial surveys in June 2008, most bearded seals were sighted near the mouth of Steensby Inlet; densities were lower in northwest Foxe Basin, northeast Foxe Basin, southern Foxe Basin, and Hudson Strait. Bearded seals were observed in small numbers during springtime seal surveys in Eclipse Sound and Milne Inlet in 2007 and 2008. Additional details on Bearded Seal can be found in Section 5.1.7, Volume 8 of the Mary River FEIS.

3.4.4.7 HARP SEALS

Harp seals occur in the northern Atlantic and Arctic oceans below 84°N. Three geographically distinct populations occur in the North Atlantic Basin but only one of which occurs in the RSA, the Northwest Atlantic population. This is the largest population, including a total of ~5.9 million animals. This population spends the summer off west Greenland and in the Canadian Arctic. Harp seal whelping occurs from late February to mid March on first year ice or landfast ice offshore Newfoundland and Labrador and in the Gulf of St. Lawrence. Harp seals enter Lancaster Sound in July and August via migration routes along the fast ice edge off east Baffin or across Baffin Bay from Greenland.

Generally, harp seals enter Pond Inlet and Navy Board Inlet at the end of July. They concentrate at the mouth of Navy Board Inlet and occasionally within Eclipse Sound throughout August and September. Harp seals were sighted in relatively high numbers during aerial surveys in Eclipse Sound and Milne Inlet. Harp seals were seen frequently in large groups of 10-50, and in one case 400. Most sightings were in Eclipse Sound. The September exodus from Lancaster Sound proceeds along the north coasts of Devon and Ellesmere islands, and then either across Smith Sound to Greenland, or along the east coast of Baffin. By October, most seals have left the Canadian High Arctic and Greenland.

Smaller numbers of harp seals also move westward into Hudson Bay and Foxe Basin during spring. Some animals move south along the east coast of Hudson Bay, reaching Southampton Island and occasionally as far south as the Belcher Islands near James Bay. Others head west across northern Hudson Bay and disperse along the west coast of the bay and Foxe Basin. There were relatively few sightings of harp seals in Hudson Strait during aerial surveys in 2008. Additional details on Bowhead Whales can be found in Section 5, Volume 8 of the Mary River FEIS.

3.4.4.8 POLAR BEAR

Polar bears have a circumpolar distribution and occur in relatively low densities throughout most of the ice-covered areas in the RSA. Polar bears tend to be more abundant along shore lead systems and polynyas during winter, where less consolidated ice cover provides habitat for prey species. Non-pregnant females, juveniles, and adult males remain active on the pack ice throughout the year, often moving considerable distances with the ice. The distribution and population size of polar bears is likely regulated by the extent of sea ice and the distribution and numbers of their primary prey, the ringed seal.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 60 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Female polar bears give birth to 1-3 cubs every 3 to 4 years. Mating occurs from April to June, and females give birth the following December or January in maternity dens, which are excavated in accumulations of snow on stable parts of landfast ice, offshore pack ice, and most often on land within approximately 50 km of the coast. Dens are created in the fall and bears leave their dens in April.

The global polar bear population is estimated at 22,000 to 25,000, of which at least 15,500 occur in Canada or in subpopulations shared with Canada. Three subpopulations of polar bears occur within the RSA: Foxe Basin, Baffin Bay, and Davis Strait with each subpopulation numbering around 2,000.

Along the northern shipping route, polar bears are distributed throughout Baffin Bay, Lancaster Sound, and along coastal areas. Polar bears from the Baffin Bay subpopulation occupy drifting pack ice and landfast ice between Baffin Island and west Greenland during winter, but can concentrate along the Lancaster Sound fast ice edge. Bears are also concentrated along landfast ice edges across Pond and Navy Board inlets during spring. Bylot Island and coastal Baffin Island are used as summer retreats when sea ice melts and also provide denning habitat for pregnant females. The Davis Strait subpopulation occurs in the Labrador Sea, eastern Hudson Strait, Davis Strait south of Cape Dyer, and an undetermined portion of southwest Greenland. Polar bears are harvested domestically as well as during commercial spring sport hunt based out of Pond Inlet. Small numbers of polar bears were observed during aerial surveys during the open-water season in Milne Inlet, Eclipse Sound, and Eskimo Inlet and on landfast ice in Milne Inlet, Koluktoo Bay, and Navy Board Inlet.

Polar bears from the Foxe Basin subpopulation range over Foxe Basin, northern Hudson Bay and western Hudson Strait during winter and move ashore during the open-water period, concentrating on Southampton Island and along the Wager Bay and other coasts within Foxe Basin. During aerial surveys polar bears were observed on landfast ice, pack ice, terrestrial areas, and in open-water areas primarily in northern Foxe Basin but also in Hudson Strait. Additional details on Polar Bear baseline studies can be found in Section 5.1.6, Volume 8 of Mary River FEIS.

3.5 SOCIO-ECONOMIC ENVIRONMENT

The Inuit of the North Baffin region have experienced tremendous social and cultural change over the course of a few decades. Recent changes, particularly residential schools, have affected family integrity and by implication, social cohesion. Elders are becoming more engaged in community life and in the education of youth in traditional skills. At the same time, a shift toward Western middle-class expectations appears to be taking place among Inuit youth.

The land-based economy is a major part of the livelihoods of many residents of the North Baffin. Harvesting from the land and sea is estimated to produce food worth between \$12 million and \$20 million per year in this region. The amount of work to harvest this food is estimated to be similar to 350 full-time jobs.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 61 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

In addition, residents of the region earn money through sales of arts and crafts, through employment, and from various government social programs such as Income Support. The personal income reported by residents of the five North Baffin communities amounted to \$83 million per year.

Residents' demand for wage employment is very high. People want to work, even when this work requires flying to remote locations. However, job opportunities in the North Baffin are limited. Inuit employment in North Baffin is characterized by many individuals earning small levels of income, well under what full-time work would pay, and a small number earning full-time, year-round incomes. Most residents working in full-time jobs in Iqaluit do so year-round. In North Baffin, many more full-time workers are engaged in these jobs for only short periods. Women who work full-time jobs in North Baffin are more likely to work year-round than are men.

Nunavut relies on federal transfer payments for at least 90 % of its revenue. Government employment is a mainstay of the wage economy, with many of Nunavut's small businesses and retail outlets established to support government needs or those of public servants. The public sector accounts for a large portion of Nunavut's economic activity. Government jobs in administration, education, and health account for about half of all employment earnings in the territory. Construction has been growing as government infrastructure has been established.

These communities have a subsistence economy and have experienced dramatic population growth over the last 20 years. Over 70 % of the population is under 25. Underemployment and lack of opportunities is causing social stress. Community Elders recognize that the communities must position themselves to enter the wage economy.

For many North Baffin households, harvest of country food provides an important contribution to overall well-being. In all five communities, caribou, ringed seal, and Arctic char are of major importance. In addition, walrus is a major species of importance in Hall Beach and Igloolik, while narwhal is a key component of the harvest among households in Arctic Bay, Pond Inlet and, to a lesser degree, Clyde River.

3.5.1 NEARBY COMMUNITIES

There are five communities of north Baffin Island in the immediate vicinity of the Project, which have existing and historical socio-economic and/or ecosystemic ties to the Project area, and for which the Project has a direct effect on the traditional land use of their residents. Listed in alphabetical order, these communities (known as Category 1 communities in literature as they are closest to the Project) include Arctic Bay, Clyde River, Hall Beach, Igloolik, and Pond Inlet. The ties of these individual communities to the Project are described in more detail:

Arctic Bay is located on northern Baffin Island, 280 km northwest of the Mary River site. Harvest and land use patterns indicate that the effect of Project activities on these current patterns of Arctic Bay residents is less than what it would have been historically. Arctic Bay residents might use the Milne Inlet, Eclipse

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 62 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Sound, and Mary River areas for hunting on a sporadic or occasional basis but other geographic areas are more important to this community's land use.

Clyde River is located in northeastern Baffin Island, 415 km from the Project area. Historical land use information and discussions with Elders from various communities suggest that the people of the Clyde River area used to travel inland from Cambridge Fiord facing Baffin Bay, into the Raven River area east of Angajurjualuk Lake and southeast of Mary River. Harvest patterns suggest that contemporary land use activities are now concentrated closer to the community, however, historical ties to the Mary River area resulted in the inclusion of this community in the study area.

Hall Beach is located on the mainland just south of Igloolik, 192 km from the Steensby Port site and 288 km southwest of the Mary River site. Hall Beach harvest patterns are distinct from Igloolik despite their proximity, with a concentration of marine harvesting centred on the Hall Beach area. Some hunting occurs on Baffin Island intermixed with Igloomingmiut hunting, including in and around Rowley and Koch islands and Steensby Inlet; thus, the Project shipping route through this area could have both land use and ecosystemic effects on the community.

Igloolik is located on the mainland but is the closest community to the Steensby Port site (155 km) and second-closest geographically to the Mary River Project site (230 km). Historically, Igloomingmiut spent the summer hunting caribou along the western side of North and Central Baffin Island. Current harvest patterns show that while Igloomingmiut use the Baffin coast and marine areas at the mouth of Steensby Inlet, their activities are heavily concentrated around the community on Melville Peninsula and the closest Baffin Island shoreline to the north. Igloomingmiut still hunt around Rowley and Koch islands and even in Steensby Inlet; thus, the Project shipping route through this area could have both land use and ecosystemic effects on the community.

Pond Inlet is geographically the closest community to the Mary River mine site, located approximately 160 km northeast of Mary River. Pond Inlet relies on hunting in the marine environment of Eclipse Sound and Milne Inlet as well as caribou hunting through the Mary River area. As such, Pond Inlet has the closest land use, historical, and ecosystemic ties to the Mary River area. Details on the socioeconomic environment surrounding the Project area are described in detail in Volume 4 of the Mary River Project FEIS, February 2012.

3.5.2 TRADITIONAL LAND USE

Human habitation of the region extends back at least 4,000 years. The historic period of a region is defined as that point where human activities are documented in written record.

The historic period of the North Baffin region begins in the late 16th century with the first European whaling and exploration in areas adjacent to Baffin Bay. Two ships that over-wintered in the Igloolik in 1822 and 1823 provide the first record of Euro-Canadian exploration in the Foxe Basin area. The Hudson Bay Company, the Royal Canadian Mounted Police, and the church established themselves at different

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 63 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

times in the vicinity of each of the existing communities, as early as 1921). The establishment of these institutions, as with the whalers before, influenced land use and settlement patterns through the mid-twentieth century. The establishment of DEW-line sites in Foxe Basin also influenced land use patterns, with Inuit settling near the DEW-line sites seeking part time employment and for trade. Traditional land use patterns changed substantially with the movement of the Inuit into permanent settlements as a result of federal policy and housing initiatives in the 1950s. Contemporary Inuit land use was determined through consideration of the Nunavut Wildlife Harvest Study interviews and discussions with local communities, and the results of the MRIKS. Connection with the land continues to be an important aspect of Inuit life and is evident in current land use patterns. Although Inuit now live in permanent settlements, travel and camping continue to be important aspects of Inuit life. Travel routes have been identified linking all the communities of north Baffin Island (Clyde River, Pond Inlet, Arctic Bay, Igloolik, and Hall Beach). Travel is an important land use practice of the Inuit as it enables the development of connections to the land, enables individuals to meet with family and friends from other communities, and enables hunting and gathering. For additional and a through breakdown of land use areas surrounding the project information refer to Figures 3.13 – Travel Routes – North Baffin Region (workshop results) and Figure 3.14 – Travel Route – North Baffin Region (interview results) from Appendix 4C – Land Use Report, Volume 4 of the Mary River Project FEIS.

Contemporary harvesting activities on North Baffin include wildlife hunting, marine mammal hunting, freshwater and marine fishing, berry picking, egg gathering, sea resource harvesting, and land resource harvesting such as soapstone. See the following figures from Appendix 4C – Land Use Report, Volume 4 of the Mary River Project FEIS for geographical representation of identified areas where harvesting activities occur:

- Figure 3.4 - Hall Beach/Igloolik Harvest Locations (Pre-1965)
- Figure 3.5 - Hall Beach/Igloolik Harvest Locations (1965-1974)
- Figure 3.6 - Arctic Bay/Pond Inlet Harvest Patterns (pre-1959)
- Figure 3.7 - Arctic Bay/Pond Inlet Harvest Locations (1959-1964)
- Figure 3.8 - Land Use information from DIAND (1982B) (showing Inuit land use by marine and terrestrial animal activity)
- Figure 3.9 - Wildlife distribution
- Figure 3.10 - Approximate Camp Areas (1930 - 1966) (not sure this is needed)
- Figure 3.19 - Berry Picking Locations - North Baffin Region (workshop results)
- Figure 3.22 - Ocean Resource Collection Areas - North Baffin Region (workshop results)
- Figure 3.31 - Reported Caribou harvest locations in North Baffin (1996 - 2001)

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 64 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

- Figure 3.33 - Reported marine mammal harvest locations on North Baffin (1996 - 2001)
- Figure 3.35 - Reported waterfowl and egg harvest locations in North Baffin (1996 - 2001)
- Figure 3.37 - Reported Fish Harvest Locations in North Baffin (1996 - 2001)
- Figure 4.2 - DFO Arctic Char Commercial Fishing Quotas for North Baffin Rivers

3.5.2.1 LAND FAST ICE

Ice is an important component of land use activities, as much of the travel engaged in by residents is on land fast ice. Land fast ice is often used to reduce travel time and to access the floe edge for hunting purposes. For more information refer to Figures 3.13 – Travel Routes – North Baffin Region (Workshop Results); Figure 3.14 Travel Routes – North Baffin Region (interview results); and Figure 3.24 – Sea Ice Conditions – North Baffin from Appendix 4C – Land Use Report, Volume 4 of the Mary River Project FEIS.

Recreational Land use several parks exist in the vicinity of the Project. Sirmilik National Park of Canada, established in 2001, is one of Canada's newest national parks and covers a considerable landmass with four separate land parcels. The Bylot Island Bird Sanctuary is located within Sirmilik National Park, affording it overlapping legal protection and restrictions on land use. Tamaarvik Territorial Park, located adjacent to the community of Pond Inlet and Little Salmon River, is a relatively small park used mainly for camping. See Figure 7.1 – Parks and Conservation Areas from Appendix 4C – Land Use Report, Volume 4 of the Mary River Project FEIS for location of the parks relative to the Project.

Local outfitting resources are available in local communities for tourism activities such as kayaking, nature viewing and polar bear hunting. Cruise ships visit the North Baffin region each summer, specifically the region around Bylot Island and Sirmilik National Park.

3.5.3 PROTECTED AREAS

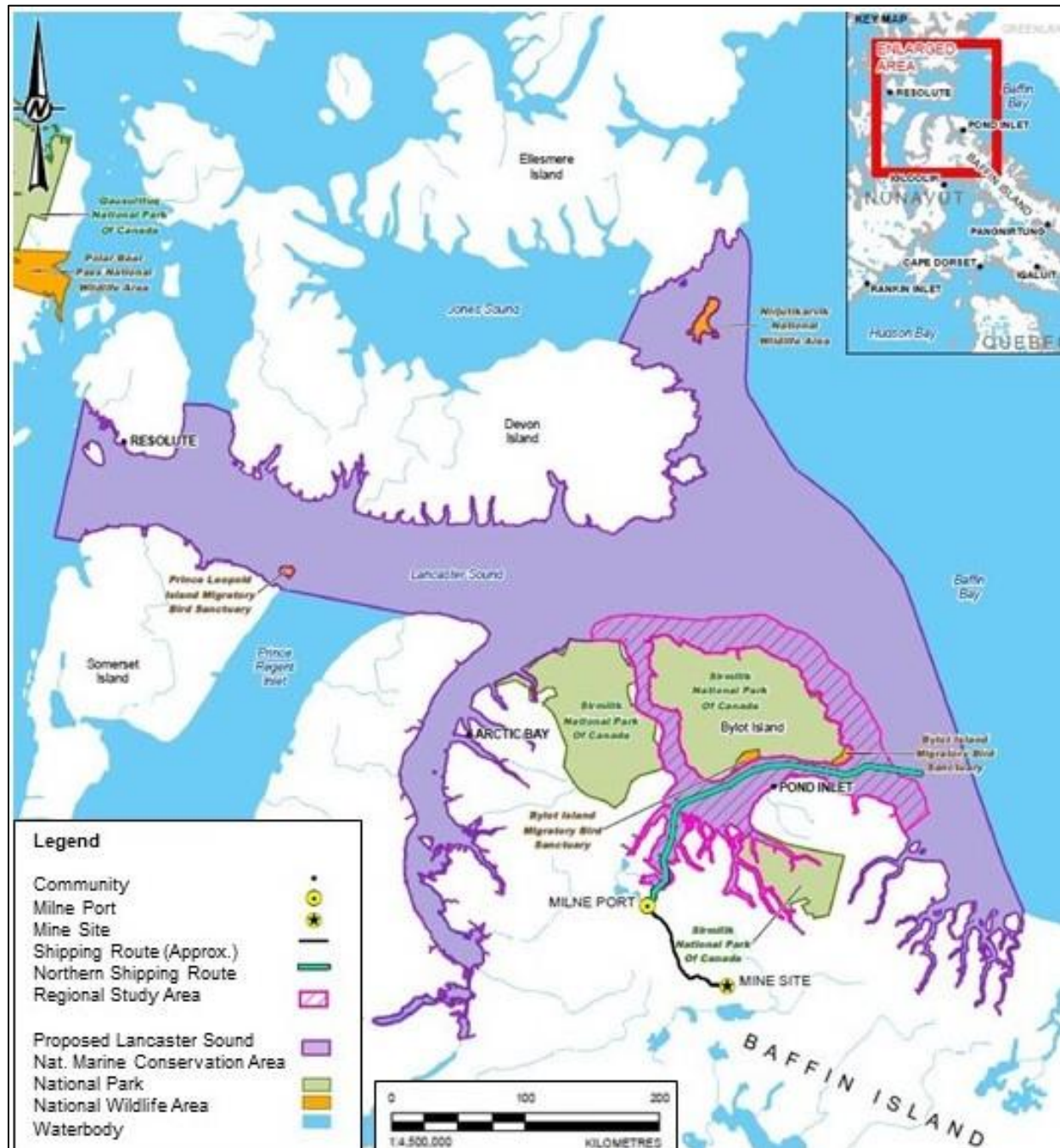
The Project does not overlap with any terrestrial protected areas and/or known critical habitats such as national or critical wildlife areas. Access to Milne Port would be through Baffin Bay into Eclipse Sound or around Bylot Island through Navy Board Inlet. Both paths are adjacent to Sirmilik National Park and Bylot Island Bird Sanctuary, and in proximity to key marine bird habitat sites near Cape Graham Moore or Cape Hay on Bylot Island. No interactions are expected along the southern shipping route through Hudson Strait and Foxe Basin.

The Government of Canada, the Government of Nunavut, and the Qikiqtani Inuit Association (QIA) signed a memorandum of understanding in December 2009 for consideration of the establishment of a National Marine Conservation Area (NMCA) in Lancaster Sound (Tallurutiup Imanga). The proposed boundary for the NMCA has been announced and encompasses the full Marine Mammal RSA, including Milne Inlet, Eclipse Sound, and Pond Inlet (Figure 3.1). A feasibility assessment on the NMCA was conducted between 2010 and 2016, and included studies of ecological values, traditional knowledge and tourism. During consultation conducted with Inuit communities, industry and government, support was expressed. Before

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 65 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

the NMCA can be officially established under the Canada *National Marine Conservation Areas Act*, an Inuit Impact and Benefit Agreement (IIBA) must be negotiated and an interim management plan (including a preliminary zoning plan) prepared. Further information is available in TSD 24 (Marine Mammals Effects Assessment).

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 66 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	



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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 67 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

4 PROJECT INFORMATION

4.1 LOCATION AND ACCESS

The basis of the Project (the Project) is production and shipment of high grade iron ore from Deposit No. 1 located on North Baffin Island in the Qikiqtani Region of Nunavut. There are three (3) main project locations consisting of the Mine Site, Milne Port located north of the Mine Site, and, Steensby Port located south of the Mine Site. The Mine Site is located approximately 160 km south of Pond Inlet (Mittimatalik) and approximately 1,000 km northwest of Iqaluit, as shown on Figure 4.1. Milne Port is connected to the Mine Site by a 115 km Tote Road. Phase 2 Proposal includes a 110 km North Railway connecting the Mine Site to Milne Port, generally paralleling Tote Road. A 149 km railway will eventually be constructed to connect Steensby Port to the Mine Site.

4.1.1 PROPONENT NAME AND ADDRESS

The proponent of this ICRP is:

Baffinland Iron Mines Corporation
2275 Upper Middle Road East, Suite 300
Oakville, ON, Canada L6H 0C3
Tel: (416) 364-8820 Fax: (416) 364-0193

4.2 PROJECT HISTORY

The Mary River iron ore deposits were originally discovered in 1962 by Murray Watts of British Ungava Explorations Limited (Brunex). Brunex staked ten claim groups in the Project area, including the Mary claims which cover the areas now known as Deposit No. 1. The private company Baffinland Iron Mines Ltd. (BIML) was established in 1963 by the financial participants and prospectors of the Brunex group to hold the Mary River claims and leases and to develop the prospects.

BIML undertook an exploration program from 1963 through 1966, with most of the field work carried out in the summers of 1964 and 1965. This work included the establishment of a 100 km tote road between Milne Inlet and the Mary River camp, and construction of gravel airstrips near the Mary River camp, at Milne Inlet, and a tundra strip at Katiktok Lake about 40 km northwest of Mary River and near Deposit No. 4. Apart from the required land surveys, some metallurgical test work, and re-examinations of project economics, no additional fieldwork was undertaken between 1965 and 2004.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 68 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

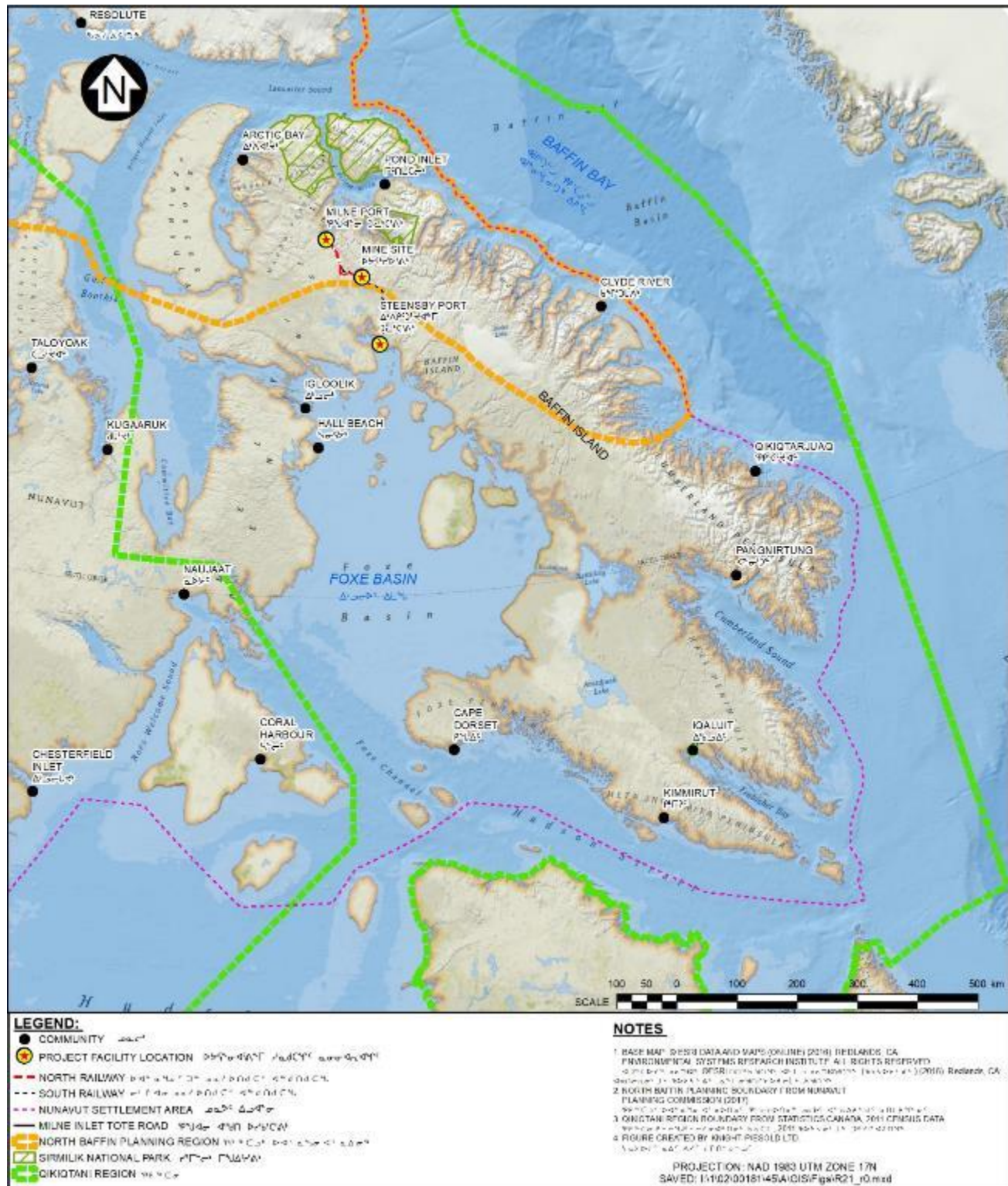


Figure 4.1 Site Location Map

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 69 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

In 2002, BIML interests were acquired by Baffinland, with the purpose of revitalizing the Project. The current Baffinland Iron Mines Corporation was formed in early 2004, which now holds exclusive rights to the ore deposits at Mary River. Continuous contemporary exploration work began in 2004. In 2007, a 250,000 tonne bulk sample program was approved by the NIRB, and a Memorandum of Understanding was signed with Nunavut Tunngavik Inc. (NTI) to gain mineral rights over 16,695 ha surrounding Deposits No. 1, 2 and 3. In addition an agreement was signed with Fednav to develop and deliver shipping solutions for the Project and letters of intent for the future sale of iron ore were signed with 3 steel companies (Thyssen Krupp, Salzgitter and Voestalpine). A further agreement for future sale of the iron ore was signed with ROGESA Roheisengesellschaft Saar mbH ("ROGESA"), a pig iron producing company, in 2008.

The year 2008 also saw the completion of a drill program focused on geotechnical, exploration and geomechanical work, as well as further investigations at the Milne Inlet and Steensby Port sites and along the Railway. In addition, a bulk sampling program was undertaken to extract, transport and ship ore for testing in Europe. The results were used to prepare a definitive feasibility study, which found 'excessively robust economics' for a Project based on 18 Mtpa of iron ore production (Baffinland press release, February 23, 2009). In March 2008, the Company submitted a Development Proposal and associated initial permit applications in order to initiate the regulatory review of a Project based on currently defined iron ore reserves. In January 2011, Baffinland submitted a Draft Environmental Impact Statement (DEIS) for stakeholder comment and review including a Preliminary Mine Closure and Monitoring Plan (DEIS, Appendix 10G). In February 2012, Baffinland submitted the FEIS in support of the development of the Project.

The FEIS included the construction, operation, closure and post-closure activities associated with the mine and its related infrastructures, the construction of a 150 km railway to link the Mine Site to a new port facility at Steensby Inlet, and the construction of the Steensby port. On January 13, 2013, Baffinland informed the NIRB that, due to various business drivers, Baffinland was proposing to make changes to the schedule and specific activities in the initial stages of the development associated with the original Mary River Project (File No. 08MN053). Baffinland noted it understood that the request would potentially necessitate a reconsideration of the Terms and Conditions contained within Project Certificate No. 005 as issued by the NIRB on December 28, 2012 for the Mary River Project.

The changes consisted of the re-introduction of shipment of up to 4.2 Mtpa ore via Milne Port, road transport of ore from the Mine Site to Milne Port via the Tote Road, and the deferral of the full-scale development of the original Project (18 Mtpa production, with railway link to Steensby Port and the development of Steensby Port). This phase was termed 'the Early Revenue Phase'. Baffinland received NIRB approval for the ERP amending the Project Certificate in May 2014. The amended Project Certificate allows for the future development of the 18 Mtpa railway operation, for a total combined production rate of 22.2 Mtpa. In 2015, the Type A Water Licence 2AM-MRY 1325 was successfully amended to account for activities approved for in the ERP in 2014. In mid-2018, Baffinland applied to increase its production to 6 Mtpa, and transport this quantity of ore on the Tote Road to Milne Port for shipping to market. Ministerial approval to transport 6 Mtpa on the Tote Road was granted until the end of 2019.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 70 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

The Phase 2 Proposal builds upon the ERP by the introduction of additional port infrastructure to handle an increase in shipping through Milne Port (including a second ore dock), and the construction of a 110 km railway between the Mine Site and Milne Port, largely following the Tote Road within the Northern Transportation Corridor. The proposal includes the continued shipment of ore along the Tote Road to 6 MTPA in 2020, and transitioning to 12 MTPA via the North Railway. The Phase 2 Proposal is currently under regulatory review.

4.3 SITE GEOLOGY

4.3.1 REGIONAL GEOLOGY

The North Baffin Island region and Mary River area lie within the Committee Belt, a granite-greenstone terrane mixed with rift basin sediments and volcanic rocks. The belt lies within the Churchill Province, extending from Baker Lake to Greenland, and is divided into five main assemblages: the Archean, the Mary River Group, the Piling Group, the Bylot Supergroup, and the Turner Cliffs-Ship Formation (Aker Kvaerner, 2008).

The Mary River iron deposits are located within the Mary River Group, an assemblage of Late-Archean (2.76 to 2.72 Ga) metasedimentary to metavolcanic rocks that have been folded and preserved in greenstone belts (Aker Kvaerner, 2008). The Mary River Group greenstone belts are present as fragmented remnants stretching from Bylot Island south to Ege Bay, with a maximum thickness of 4,000 m. Primary sequences within the Group consist of a lower series of metavolcanic rocks and an upper series of turbidite pelitic-greywacke; the stratigraphic position of iron formation, quartzite, conglomerate, minor marble, and volcanic breccia units within the belts, which varies across the region. The Mary River Group is part of the regional Committee Belt, an Archean-aged (2.9 to 2.5 Ga) assemblage of granite-greenstone terranes, granitic migmatites gneissic granitic intrusions, and clastic and carbonate sedimentary units reworked during the Paleo-Proterozoic (2.5 to 1.6 Ga).

4.3.2 IRON ORE DEPOSIT GEOLOGY

Iron formations occur in varying thicknesses discontinuously within the Mary River Group metasedimentary units but are typically not present in economically extractable thicknesses or configurations except in the Mine Site area. The high-grade iron ore at Deposits No. 1, 2, 3 and 4 were discovered in 1962, and these initial hematite-magnetite mineralized zones were mapped within extensive belts of banded iron formation in the area over the next three years. Deposit No. 5 was discovered and surface mapped in 2009. The deposits are characterized by zones of massive layered to brecciated hematite to magnetite, variably intermixed with banded oxide to silicate facies iron formation. As typified at Deposit No. 1, the high-grade iron formations are interlayered with thin bands of chlorite-actinolite schist, staurolite-garnet-mica schist, amphibolite, and banded iron formation across their strike width, with the entire assemblage up to 400m thick.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 71 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

The Mary River iron deposits are considered to belong to an Algoma-type iron formation (Aker Kvaerner, 2008) formed in a volcanic ark setting in an extensional or rift basin during the Archean. Algoma-type deposits are typically characterized by a lower series of volcanics followed by banded iron formation and/or interlayered to pure iron oxides of variable and potentially substantial thickness, in turn overlain by volcanics and volcanoclastic sediments (Gross, 1996).

4.3.3 GEOTECHNICAL OVERVIEW

4.3.3.1 MILNE PORT

The Milne Port area consists of a series of variably dipping, dissected terraces sloping towards the waters of Milne Inlet. The surficial deposits are marine and glacial marine sediments, ranging from coarse beach sediments (gravel and sand) to finer deltaic sediments (clay, silt, sand and gravel) to even finer deep water periglacial silt veneers (silt, clay and fine sand). The soils in the area are often covered by a thin layer of organics at the ground surface. The soils were noted to typically be frozen below 2 m depth and contain ice lenses (Mary River Project FEIS 2.1.3.1). Offshore drilling encountered loose to compact silty sand underlain by sand containing varying amount of gravel and cobbles.

4.3.3.2 TOTE ROAD AND NORTH RAILWAY

The Tote Road generally follows a glacial valley, oriented northwest-southeast to the Mine Site. The surficial deposits along this alignment generally include the following materials:

- Till deposits: veneer (up to 2 m thick) or blanket (up to 10 m thick) with drumlins and moraines (in places);
- Glaciofluvial sediments: outwash gravel and sand forming braided floodplains, terraces and fans or stratified glacial drift (gravel and sand);
- Limited bedrock exposure: especially nearer to the Mine Site/Deposit No. 1 area; and
- Mary River flows across the glacial valley to the southeast of the Mine Site, and several thaw lakes and thermokarst depressions are located along the valley floor.

The proposed North Railway follows the Tote Road for most of its length, except for an approximately 20 km deviation near David Lake. Starting at Milne Port, the alignment crosses approximately 20 km of Precambrian terrain, glaciofluvial sand and gravel terraces. Further south, the rail alignment spans across relatively flat lying Paleozoic rocks with mainly dolomitic limestone units for approximately 70 km. The final stretch of the rail alignment traverses glaciolacustrine and glaciofluvial plains, terraces, eskers, and bedrock outcrops ranging from granitic gneiss to sedimentary rocks.

Detailed geotechnical and related studies were completed for the Water License amendment application and can be found in the Mary River Project Phase 2 Proposal, TSD 02. Technical design criteria for the Tote Road and Railway can be found in Attachment 5 and 6 to the TSD; figures are included in Attachments 7 and 8 to the TSD, respectively.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 72 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

4.3.3.3 MINE SITE

Deposit No. 1 is located along the top and margins of a bedrock hill on the north side of the valley, while the waste rock piles will be located along the west-facing and east-facing side slopes of the hill. Bedrock is exposed at the apex of the deposit with talus present on the upper slopes. The mid slopes on the east side of the deposit comprise up to 50 m (vertical depth) of glacial till, tapering out to near surface bedrock at the base of the slope. The till on the north and west side of deposit is shallower, in the 10 to 15 m range. The till around Deposit No. 1 is typically dominated by boulders, cobbles, gravel and trace to some organics and a moderately thick, wet organic layer is present over the majority of this upper area. The overburden materials are considered to be very ice-rich based on-site investigations, observations from bulk sample road construction and general understanding of the deposit.

Other Project-related infrastructure in the Mine Site area will be located on areas of glaciofluvial terrace along the valley floor directly south and southwest of Deposit No. 1. In addition to the glaciofluvial deposits, there appears to be some direct glacial deposition in and around the south-eastern portion of Sheardown Lake. Overburden depths over the majority of the valley floor are typically noted to be in the 10 to 20 m thickness ranges. Based on the investigations and surficial features in and around these deposits, evidence of ice-rich areas and localized massive ice bodies are present, particularly in the vicinity of the existing airstrip areas. A thin organic layer is present in some areas, over the till, in depressions and at the base of some slopes.

Underlying the glaciofluvial materials southwest of the deposit in the valley floor is weak, unconsolidated sandstone; gneissic bedrock to the south, west and north of Deposit No. 1; and amphibolite schists to the east. Often, the upper horizon of the bedrock is highly fractured and often contains ice lenses and/or infilling in the joints.

4.4 PROJECT SUMMARY

A detailed Project Description for the project has been presented in Volume 3 of the Mary River Project Final Environmental Impact Statement and its associated Addendum (Baffinland 2013), and updated in the Phase 2 Proposal (Baffinland 2018).

Pending the approval of the Phase 2 Proposal, the Mary River Project will consist of mining iron ore from the reserve at Deposit No. 1 at a production rate of up to 30 Million tonnes per year (Mtpa). The Project would be developed in several phases:

- **Early Revenue Phase (ERP):** Ore has been mined at a rate of 4.2 Mtpa and trucked via the Tote Road to Milne Port, from which it is loaded onto ships during the open water season. Baffinland received Ministerial approval to increase production and shipping to up to 6 Mtpa in 2018 and 2019.
- **Phase 2 (12 Mtps):** With the construction of the North Railway, transport of ore will increase from 6 Mtpa via Tote Road to 12 Mtpa via the railway, with shipping via two (2) ore docks during thenominal shipping window from July 1 to Novemeber 15.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 73 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

- **Full-scale (30 Mtpa) Approved Project:** As global markets improve for the prices of iron ore, the Company intends to proceed with the construction and operation of the larger Approved Project, which includes a railway link for the transportation of ore to Steensby Port, and the construction and operation of year around port facilities on Steensby Inlet for the shipment of iron ore.

In 2017 and 2018, Baffinland focused on mine production from Deposit No. 1 and demonstrated efficiencies and the ability to mine more than 4.2 Mtpa. In mid-2018, Baffinland applied to increase its production to 6 Mtpa, and transport this quantity of ore on the Tote Road to Milne Port for shipping to market. Ministerial approval to transport 6 Mtpa on the Tote Road was granted until the end of 2019. The Phase 2 Proposal application includes continuing to truck 6 Mtpa of ore on the Tote Road while the North Railway is under construction, which is anticipated to consist of a three-year construction period, starting as early as 2019 following approval of the Phase 2 proposal. Once the northern half of the North Railway is operational, 12 Mtpa will be transported by truck to the temporary transfer station, where it will be loaded onto trains for transport to Milne Port; the temporary transfer station is expected to be used for 1-2 years until the southern half of the railway is complete and ore transportation will occur completely by train between the mine site and Milne Port.

It is expected that the Steensby Port facilities and the South Railway will take four (4) years to construct. Upon completion of the South Railway and Steensby Port construction, an additional 18 Mtpa of iron ore will be transported by rail and transferred to ore carrier vessels from Steensby Port for shipment to international markets. Shipping of ore from Steensby Port will occur year-round and will require vessels with icebreaking capabilities.

The Project sites are shown on Figure 4.2, and the Major Project Components are listed in Table 4.1. The Mine site layout is shown on Figure 4.3. Unless otherwise noted in Section 6, all project infrastructure are intended to have a similar lifespan as that of the Project.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 74 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

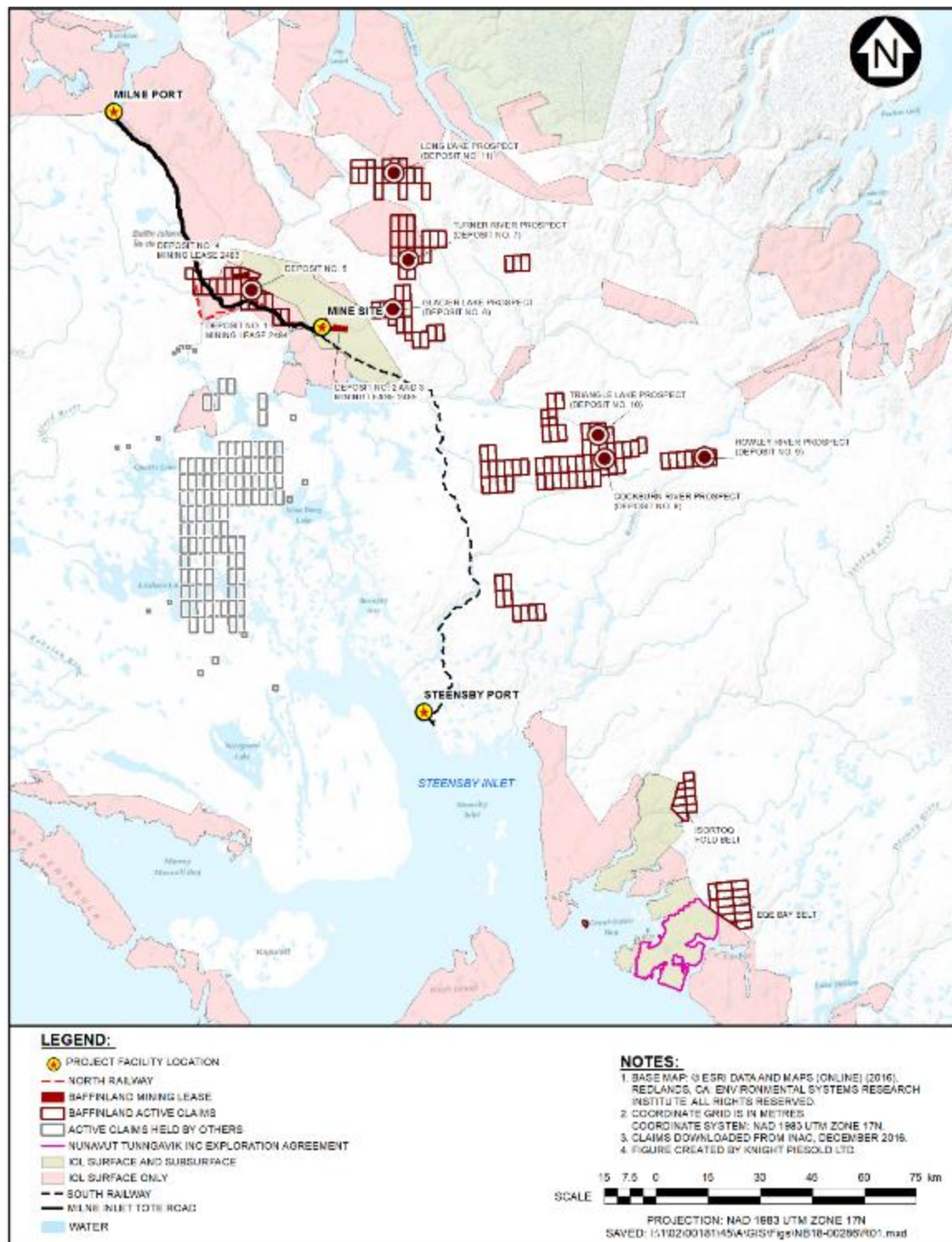


Figure 4.2 Relative Location of Project Areas

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 75 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

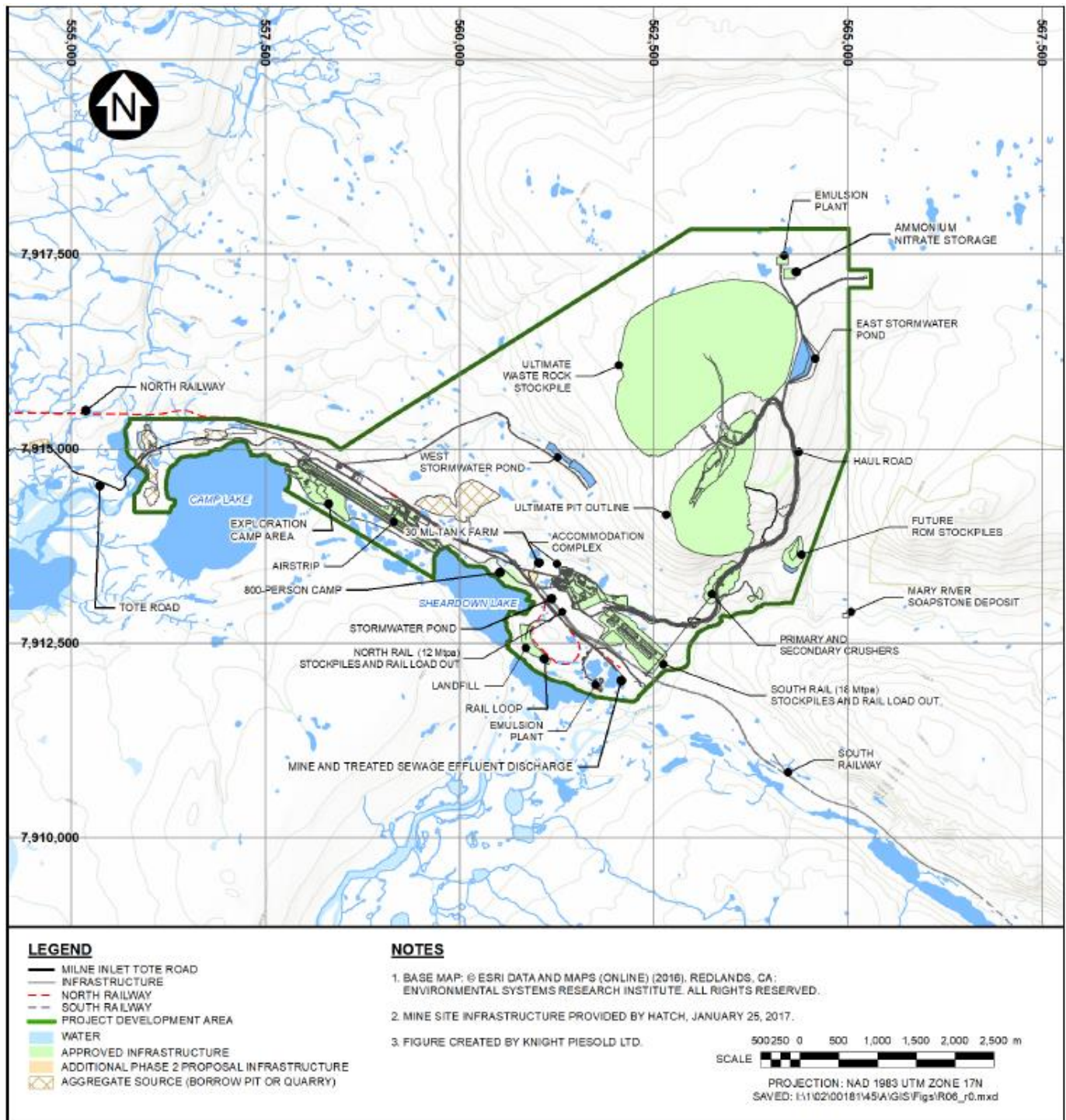


Figure 4.3 Mine Site – Phase 2 Proposal Layout

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 76 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

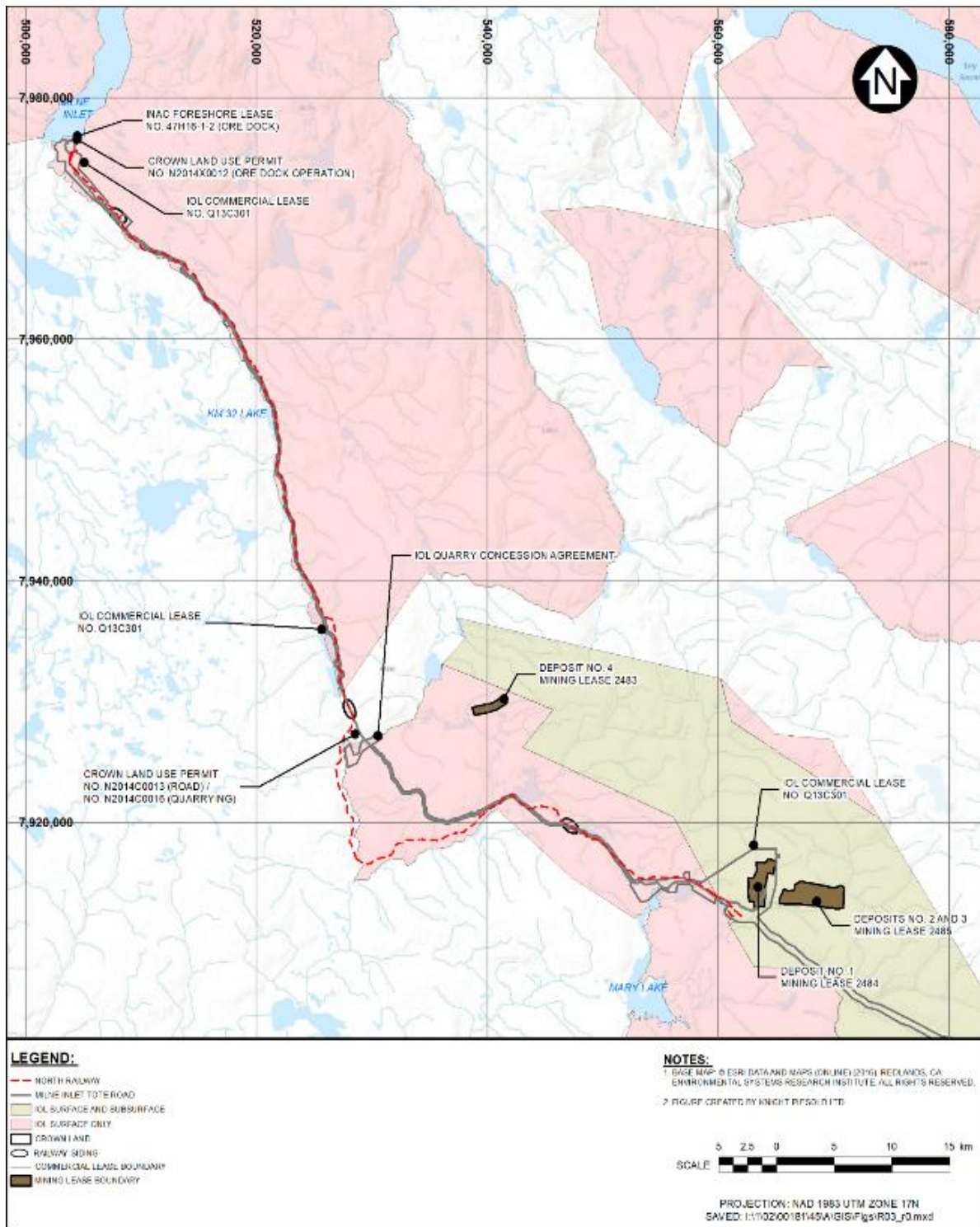


Figure 4.4 Northern Transportation Route

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 77 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

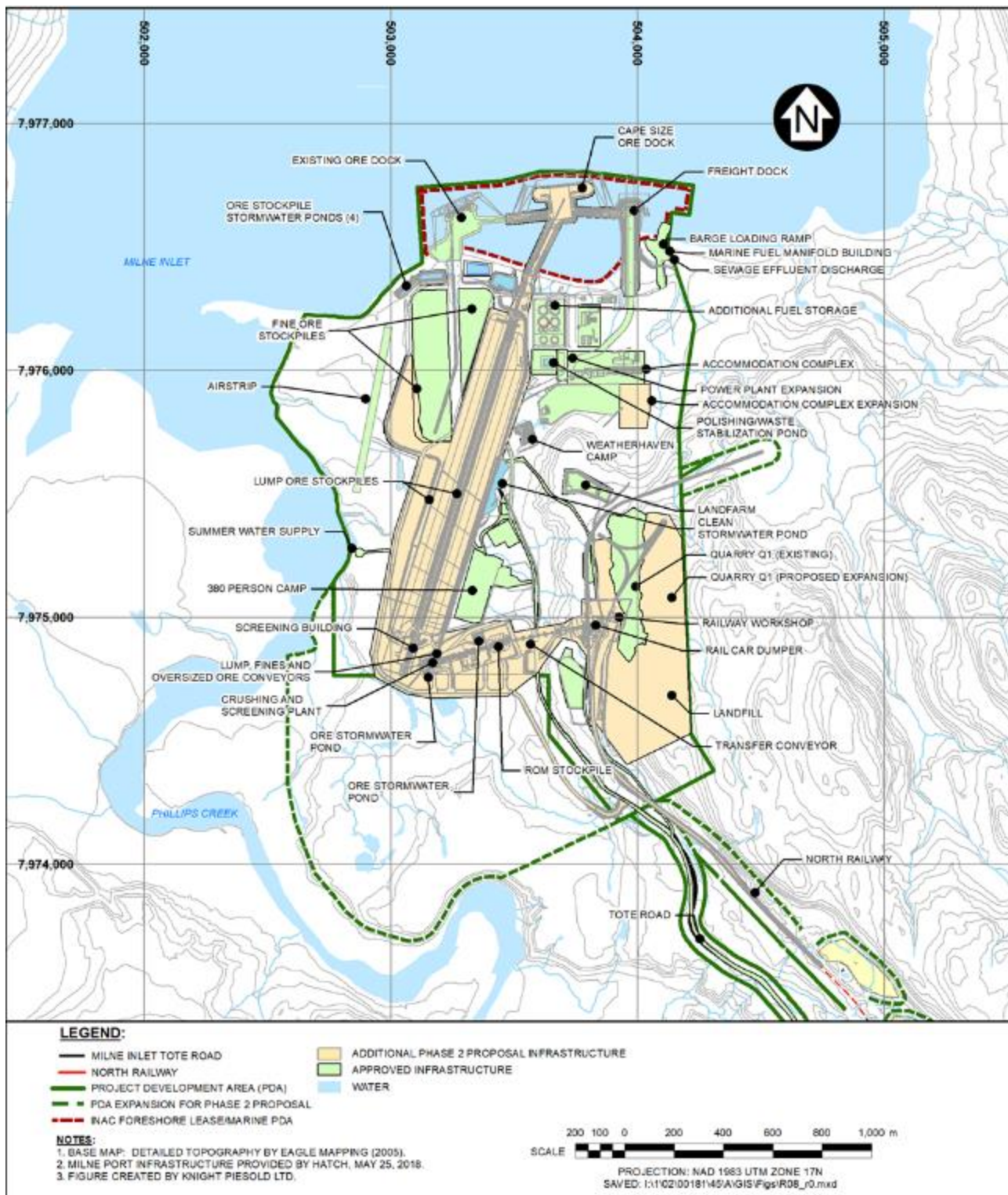


Figure 4.5 Milne Port – Phase 2 Proposal Layout

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 78 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 4.1: Major Project Components

Major Infrastructure Components	Authorized under Project Certificate No 005	Authorized under Project Certificate No 005, ERP Amendment ²	Status of Development as of March 31, 2019	Land Ownership
Milne Port Site				
Ultimate development area	x	-	On going	IOL
Site development, grading, roads, laydown, drainage	x	x	Completed	IOL
Water supply (intake, transport, storage and distribution)	x	-	Completed	IOL
Potable water treatment plant expansion			On going	IOL
Quarries and borrow pits	x	-	On going	IOL
Camp	x	-	Completed	IOL
Camp expansion (operations 380-bed)			On going	IOL
Sewage treatment plant and discharge	x	-	Completed	IOL
Sewage treatment plant expansion			On going	IOL
Polishing Waste Stabilization Pond (PWSP)	x	-	Completed	IOL
Incinerator	x	-	Completed	IOL
Service buildings (field offices, maintenance shops, vehicle wash stations, ERT, warehouses, concrete batch plant)	x	-	Completed	IOL
Waste management facilities including temporary storage areas	x	-	Completed	IOL
Landfarm	x	-	Completed	IOL
Power generation and distribution	x	-	Deferred	IOL
Transitional power generation and distribution	x	-	Completed	IOL
Hazardous material storage areas	x	-	Completed	IOL
Fuel tank farm and fuel dispensing facilities (Arctic Diesel, Jet-A Fuel)	x	-	Completed	IOL
Fuel tank farm and fuel dispensing facilities (Marine Diesel)	-	x	Not started	IOL
Ore stockpile	-	x	Completed	IOL
Ore stockpile Phase 2 expansion			Proposed	IOL
Ore handling facilities (unloading, transfer and stockpiling, reclaiming, ship loading) and associated surface runoff ponds	-	x	Ongoing	IOL
Ore dock	-	x	Completed	Crown Land
Second ore dock (Capesize capacity)			Proposed	Crown Land

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 79 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 4.1: Major Project Components

Major Infrastructure Components	Authorized under Project Certificate No 005	Authorized under Project Certificate No 005, ERP Amendment ²	Status of Development as of March 31, 2019	Land Ownership
Ore handling for second ore dock			Proposed	IOL
Freight dock	-	x	Not started	Crown land
Explosives storage	x	-	Completed	IOL
12 Mt Secondary ore crushing facility housed in new building			Proposed	IOL
Railway switch yard			Proposed	IOL
Railway unloading station			Proposed	IOL
Railway maintenance building			Proposed	IOL
Airstrip relocation			Deferred	IOL
Tote Road				
Realignment and grade improvement	x	-	On going	IOL/Crown
Water crossings improvement/replacement	x	-	On going	IOL/Crown
Bridge construction	x	-	Completed	IOL
Borrow Pits and Quarries	x	-	In progress	IOL/Crown
Water withdrawal for dust control	x	x	On going	IOL
Mine Site				
Mine Site development, grading, service roads, ore haul roads, laydown, drainage and diversions	x	-	Completed	IOL
Camp Lake water supply (intake, transport, storage and distribution)	x	-	Completed	IOL
Water crossings and surface water diversions	x	-	On going	IOL
Quarries and borrow pits	x	-	On going	IOL
Transitional Camps (early development)	x	-	Completed	IOL
Sewage treatment plants, PWSPs and discharge	x	-	Completed	IOL
Incinerator	x	-	Completed	IOL
Permanent camp and construction camp	x	-	Completed	IOL
Service buildings (field offices, temporary or transitional construction facilities, light vehicles maintenance shops, ore trucks maintenance shops, vehicle wash stations, ERT, warehouses, concrete batch plant)	x	-	Completed	IOL

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 80 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 4.1: Major Project Components

Major Infrastructure Components	Authorized under Project Certificate No 005	Authorized under Project Certificate No 005, ERP Amendment ²	Status of Development as of March 31, 2019	Land Ownership
Mining fleet maintenance facilities	x	-	Completed	IOL
Mining activities	x	-	On going	IOL
Waste rock storage with associated runoff control structure	x	-	In progress	IOL
Waste Rock facility water treatment plant			Completed	IOL
Waste management facilities including temporary storage areas	x	-	Completed	IOL
Landfill	x	-	Completed	IOL
Landfarm	x	-	Deferred	IOL
Transitional power generation and distribution	x	-	Completed	IOL
Power generation and distribution	x	-	On going	IOL
Hazardous material storage areas	x	-	Completed	IOL
Permanent fuel tank farms and fuel dispensing facilities (arctic diesel, jet A fuel – 15.5 ML)	x		Deferred	IOL
Transitional fuel storage facilities (multiple fuel storage tanks for construction phase)	x	-	Completed	IOL
Temporary crushing facility (crusher trains)	x	-	On going	IOL
Permanent crushing facilities	x	-	Deferred	IOL
Transitional ore stockpile and runoff control	-	x	In progress	IOL
Ore stockpiling (run of mine, crushed ore) and associated runoff control ponds	x	-	Deferred	IOL
Ore handling facilities (unloading, transfer, tertiary crushing and screening, stockpiling, reclaiming, railway loading) and associated surface runoff ponds	x	-	Deferred	IOL
Airstrip extension	x	-	Completed	IOL
Explosives storage	x	-	Completed	IOL
Emulsion plant	x	-	Completed	IOL
North Railway turning loop			Proposed	IOL
North Railway				
Service Road			Proposed	IOL/Crown

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 81 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 4.1: Major Project Components

Major Infrastructure Components	Authorized under Project Certificate No 005	Authorized under Project Certificate No 005, ERP Amendment ²	Status of Development as of March 31, 2019	Land Ownership
Access Roads			Proposed	IOL/Crown
Railway Embankment			Proposed	IOL/Crown
Borrow Pits and Quarries			Proposed	IOL/Crown
Water crossings (bridges and culverts)			Proposed	IOL/Crown
Railway construction and operation			Proposed	IOL/Crown
Temporary transfer station			Proposed	IOL
Laydown Areas and associated shelters and equipment shops			Proposed	IOL/Crown
Mobile temporary construction camps			Proposed	IOL
Explosives storage areas			Proposed	IOL
Ancillary facilities (e.g. Communication towers)			Proposed	IOL/Crown
South Railway				
Service road (up to 25 km south of Mine Site)	x	-	Deferred	IOL
Railway embankment (up to 25 km south of Mine Site)	x	-	Deferred	IOL
Borrow pits and quarries (up to 25 km south of Mine Site)			Deferred	IOL
Water crossings (bridges and culverts)	x	-	Deferred	IOL
Winter road (up to 25 km south of Mine Site)	x	-	Deferred	IOL
Service road	x	-	Deferred	Crown land
Railway embankment	x	-	Deferred	Crown Land
Winter road	x	-	Deferred	Crown Land
Railway construction and operation	x	-	Deferred	Crown Land
Railway construction camps, sewage treatment facilities, emergency ponds and incinerator	x	-	Deferred	Crown Land
Railway camps associated services facilities	x	-	Deferred	Crown Land
Water crossings (bridges and culverts)	x	-	Deferred	Crown Land
Multiple construction fuel storage units	x	-	Deferred	Crown Land
Mobile explosive units	x	-	Deferred	Crown Land

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 82 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 4.1: Major Project Components

Major Infrastructure Components	Authorized under Project Certificate No 005	Authorized under Project Certificate No 005, ERP Amendment ²	Status of Development as of March 31, 2019	Land Ownership
Tunnel construction and disposal of waste rock	x	-	Deferred	Crown Land
Borrow pits and quarries	x	-	Deferred	Crown Land
Steensby Port Site				
Site development, grading, roads, laydown, drainage	x	-	Deferred	Crown Land
Water supply (intake, transport, storage and distribution)	x	-	Deferred	Crown Land
Water crossings and diversions	x	-	Deferred	Crown Land
Quarries and borrow pits	x	-	Deferred	Crown Land
Camp	x	-	Deferred	Crown Land
Sewage treatment plant, PWSPs and discharge	x	-	Deferred	Crown Land
Incinerator	x	-	Deferred	Crown Land
Service buildings (field offices, temporary construction facilities, light vehicles maintenance shops, ore trucks maintenance shops, vehicle wash stations, ERT, warehouses, concrete batch plant)	x	-	Deferred	Crown Land
Waste management facilities including temporary storage areas	x	-	Deferred	Crown Land
Landfill	x	-	Deferred	Crown Land
Landfarm	x	-	Deferred	Crown Land
Power generation and distribution	x	-	Deferred	Crown Land
Hazardous material storage areas	x	-	Deferred	Crown Land
Fuel tank farms and fuel dispensing facilities (Arctic Diesel, Jet A-Fuel and Marine Diesel)	x	-	Deferred	Crown Land
Railway switch yard	x	-	Deferred	Crown Land
Railway terminal maintenance shop	x	-	Deferred	Crown Land
Ore stockpile	x	-	Deferred	Crown Land
Ore handling facilities (unloading, transfer, tertiary crushing and screening, stockpiling, reclaiming, ship loading) and associated surface runoff ponds	x	-	Deferred	Crown Land
Ore dock	x	-	Deferred	Crown Land

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 83 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 4.1: Major Project Components

Major Infrastructure Components	Authorized under Project Certificate No 005	Authorized under Project Certificate No 005, ERP Amendment ²	Status of Development as of March 31, 2019	Land Ownership
Freight dock	x		Deferred	Crown Land
Airstrip	x	-	Deferred	Crown Land
Explosives storage	x	-	Deferred	Crown Land
Emulsion plant	x	-	Deferred	Crown Land
Overwintering of fuel barge	x	-	Deferred	Crown Land
Dredged sediment disposal area	x	-	Deferred	Crown Land

Note 1: Includes additional authorizations under Type A Water Licence 2AM-MRY1325 – Amendment No. 1

Note 2: Includes additional authorizations under Type A Licence 2AM-MRY1325 – Amendment No. 1

On going items may refer to existing infrastructure which will be modified and/or expanded with the Phase 2 Proposal.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 84 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 4.2: Key Facts Table

Calendar Year	Measure	2019	2020	2021	2022	2023	2024	2025	2026 - 2035
Project Year		1	2	3	4	5	6	7	17-Aug
PRODUCTION AND EMPLOYMENT									
Pit Production Rates Schedule (Mtpa)		Phase 2 Construction							
				South Railway/Steensby Port Construction					
- Full Project	Mtpa	6	6	12	12	12	21	30	30
- North Railway	Mtpa	6	6	12	12	12	12	12	12
- South Railway	Mtpa						9	18	18
- Total Material Moved	Mtpa	7.9	9.4	21.3	24	25.8	51.1	80.5	75 (Average)
- Strip Ratio	%	0.3	0.6	0.8	1	1.1	1.4	1.7	1.5 (Average)
- Waste Rock	Mtpa	1.9	3.4	9.3	12	13.8	30.1	50.5	45 (Average)
MINE SITE FACILITIES, INFRASTRUCTURE AND ACTIVITIES									
Project Development Area									
- Land	ha	The land-based development area (2740 ha) will not change							
Ore Movement									
- Ore mined	Mt	6	6	12	12	12	21	30	30
- Run of Mine stockpile	Mt	0.4	0.4	0.4	0.4	0.4	0.4	0.4	0.4
- Crushed ore stockpile	Mt	1.4	1.4	1.4	1.4	1.4	1.4	1.4	1.4
- Waste rock stock pile	Mt	4.4	7.8	17.1	29.1	42.8	73	123.5	643 (Total)
Fuel Storage on Site									
- Arctic diesel	ML	45	45	45	45	45	45	45	45
- Other fuels	ML	4	4	4	4	4	4	4	4
Fuel Consumption									

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 85 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 4.2: Key Facts Table

Calendar Year	Measure	2019	2020	2021	2022	2023	2024	2025	2026 - 2035
Project Year		1	2	3	4	5	6	7	17-Aug
- Arctic diesel		22	25	53	58	60	88	121	80 - 140
Power Generation Capacity									
- Diesel power plant (installed)	MW	11	14	16	19	22	28	28	28
- Avg annual power demand	MW	6	7	9	9	9	9	9	9
Accommodation Facilities									
- Temporary	# of beds	150	150	400	400	400	400		
- Permanent	# of beds	800	800	800	800	800	800	800	800
Water Supply									
- Camp Lake (Construction)	m³/day	Licensed for 657m³/day during construction and 367.5m³/day during operation for domestic and industrial purposes							
- Demand (domestic & industrial)	m³/day	285	285	360	360	360	360	240	240
Waste Management and Expected Quantities									
- to landfill	m³/yr	7,500	7,500	7,500	7,500	7,500	7,500	2,500	2,500
- to incinerator	m³/yr	1,457	1,457	1,840	1,840	1,840	1,840	1,227	1,227
Quarried Material									
- Number of quarries	#	Material will be sourced from 4 quarries within the Mine Site PDA							
- quantities	m³	100,000	100,000	100,000	To be sourced as necessary for road repairs				
MILNE INLET TOTE ROAD FACILITIES, INFRASTRUCTURE AND ACTIVITIES									
Project Development Area									
- Land	ha	The land-based development area will not change							

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 86 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 4.2: Key Facts Table

Calendar Year	Measure	2019	2020	2021	2022	2023	2024	2025	2026 - 2035
Project Year		1	2	3	4	5	6	7	17-Aug
- Length of road	km	The Tote Road length remains unchanged							
- Water crossings	#	Up to 13 new culverts and relocation of 5 existing culverts							
Tote Road Operation									
- Service vehicle traffic									
- Construction (railway)	trips/week	Use of Tote Road will be mostly localized around construction points between 2019 and 2021							
- Operations	trips/week	250	250	250	250	250	250	250	250
- Ore transportation traffic									
- Quantity	Mtpa	6	6	12					
- Total trips per day	trips/day	280	280	560*					
Fuel Consumption									
- Arctic diesel	ML/yr	18	18	36					
NORTH RAILWAY FACILITIES, INFRASTRUCTURE AND ACTIVITIES									
Project Development Area									
- Land	ha	The land-based development area will be 1,306 hectares							
- Length of railway	km	The railway will be approximately 110 km long							
- Length of additional service trail	km	An additional service trail 27.5 km in length will be required							
- Water crossings	#	Up to 425 crossings will be established (421 culverts and 4 bridges)							
Quarried Material									
- Quantities	m³	1,000,000	1,000,000	800,000					
- Number of quarries	number	Material will be sourced from up to 30 quarries, plus one borrow area (Rail Sand Pit) during the operation phase							

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 87 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 4.2: Key Facts Table

Calendar Year	Measure	2019	2020	2021	2022	2023	2024	2025	2026 - 2035
Project Year		1	2	3	4	5	6	7	17-Aug
Railway Operation									
- Railway ore shipment	Round trips/day			8	8	8	8	8	8
- Railway track inspection	Round trips/week			4	4	4	4	4	4
Fuel Consumption									
- Arctic diesel	ML/yr			8	8	8	8	8	8
Temporary Accommodations									
- Beds	# of beds	255	255	255					
- Fuel storage	litres	30,000	30,000	30,000					
MILNE PORT FACILITIES, INFRASTRUCTURE AND ACTIVITIES									
Project Development Area									
- Foreshore	ha	The foreshore development area will remain at 36.4 hectares							
- Land	ha	The land-based development area will increase to 379 hectares							
- Ore stockpiles	Mt	Ore stockpiles increased to hold 7.8 Mt for operations							
Quarried Material									
- Quantities	m³	400,000	200,000	100,000					
- Number of quarries	#	Material will be sourced from a single quarry (Q1) within the Milne Port PDA							
Fuel Storage Capacity									
- Arctic diesel	ML	64	64	64	64	64	64	64	64
- Jet fuel	ML	3	3	3	3	3	3	3	3
- Marine diesel	ML	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2
- Other fuels	ML	0.4	0.4	0.4	0.4	0.4	0.4	0.4	0.4

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 88 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 4.2: Key Facts Table

Calendar Year	Measure	2019	2020	2021	2022	2023	2024	2025	2026 - 2035
Project Year		1	2	3	4	5	6	7	17-Aug
Fuel Consumption									
- Arctic diesel	ML	11	13	29	30	30	30	30	30
Power Generation Capacity									
- Diesel power plant	Installed MW	9.45	22	22	22	22	22	22	22
- Avg annual power demand	MW	6	6	8	8	8	8	8	8
Accommodation									
- Temporary	# of beds	300	300	300					
- Permanent	# of beds	710	710	710	710	710	710	710	710
Waste Management and Estimated Quantities									
- Landfill	m³/yr	7,500	7,500	7,500	7,500	7,500	7,500	2,500	2,500
- Incinerator	m³/yr	761	761	761	535	535	535	535	535
- Shipped off site	m³/yr	510	510	1,020	600	600	1,050	1,500	1,500
- Hazardous waste	m³/yr	240	240	480	480	480	840	1,200	1,200
NORTHERN SHIPPING FACILITIES, INFRASTRUCTURE AND ACTIVITIES									
Ore Docks									
- Ore docks	#	A second ore dock capable of berthing Cape-size vessels will be constructed							
Shipping Season									
- Seasonal shipping		Open Water Shipping		Extended Shipping (July 1 to November 15)					
Ore Shipments									
- Ore carriers	type	Panamax/Supramax		Addition of Cape-size ore carriers					
- Ore shipments	Mtpa	6	6	9	12	12	12	12	12

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 89 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 4.2: Key Facts Table

Calendar Year	Measure	2019	2020	2021	2022	2023	2024	2025	2026 - 2035
Project Year		1	2	3	4	5	6	7	17-Aug
- Ore shipments	trips/yr	83	83	134	134	134	134	134	134
Freight Shipments									
- Freight deliveries	trips/yr	18	18	18	18	18	18	10	10
- Freight tonnage	m ³ /yr	350,000	350,000	350,000	350,000	350,000	350,000	200,000	200,000
Fuel Shipments									
- Fuel deliveries	trips/yr	3	4	8	6	7	8	11	10-Aug
- Arctic diesel	ML/yr	51	56	126	96	98	126	159	120-180
- Marine diesel	ML/yr	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2
- Jet A	ML/yr	3	3	3	3	3	3	3	3

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 90 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

The Mine Site, Milne Port and Steensby Port, connecting infrastructure and principal camp locations site plans are shown on the series of figures above. These figures represent the intended site layouts upon completion of Project operations including Phase 2 and the (South) Railway Execution Phase. Figures illustrating site infrastructure that are expected to exist at the end of mining are presented in Appendix A. Aerial photos of recent site conditions are presented in Appendix C.

There has been no change to the closure strategy for the approved (South) Railway Execution Phase of the Project (as approved under the Project Certificate No. 005). For drawings to account for interim closure and reclamation adjustments to reflect project development phases until such a time planned closure commences, see documents/figures associated with the Annual Security Review (ASR) process conducted in accordance with Schedule C of Type “A” Water License 2AM-MRY1325 - Amendment No. 1 and Section 9.2 of the Commercial Lease, No. Q13C301, agreed to between Baffinland and the QIA.

Until such time the (South) Railway Execution Phase commences, Steensby Camp and other explorations camps along the proposed South Railway corridor and exploration areas will be governed by the Exploration Closure and Reclamation Plan (BAF-PH1-830-P16-0038).

Table 4.3: Drawings for Mine Closure and Reclamation

Drawing Number	Drawing Title
Figure A.1	Milne Port - Site Infrastructure, End of Mining
H353004-00000-224-272-000(1-3) -0001	Northern Transportation Corridor, Site Plan – Plan and Longitudinal Sections
Figure A.1	Mine Site - Site Infrastructure, End of Mining
H337697-2000-07-012-0001	Preliminary Mine Closure and Reclamation Plan – Railway Alignment
H337697-7000-07-012-0002	Preliminary Mine Closure and Reclamation Plan – Ravn River Rail Camp
H337697-7000-07-012-0003	Preliminary Mine Closure and Reclamation Plan – Mid Rail Camp
H337697-7000-07-012-0004	Preliminary Mine Closure and Reclamation Plan – South Cockburn Lake Rail Camp
H337697-4510-07-012-0001	Preliminary Mine Closure and Reclamation Plan – Steensby Port Construction Phase
H337697-4510-07-012-0002	Preliminary Mine Closure and Reclamation Plan – Steensby Port Final Closure Phase

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 91 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

4.4.1 INUIT OWNED LANDS LAND ACCESS

The Inuit Owned Lands (IOL) surrounding the Project area are shown on Figure 4.2. The Commercial Lease, No. Q13C301, is held by Baffinland and is leased from the Qikiqtani Inuit Association (QIA). In accordance with this and any future surface leases held with the QIA, this ICRP incorporates the guidelines developed for the Qikiqtani lands entitled the Abandonment and Reclamation (A&R) Policy for Inuit Owned Lands (Version 3.0, QIA 2013). The QIA guidelines used for this ICRP are summarized in Appendix B. Milne Port and the Mine Site are entirely located on Inuit Owned Land. The first 25 km of the South Railway and access roads are located on Inuit Owned Land. All remaining Project areas are located on Crown land.

Land leases and permits will be amended or additional approvals obtained for the additional land area required for the Phase 2 Project is shown on the mapbook included in the Phase 2 Proposal, Appendix B of TSD 02 (Figure B.4). The final lease requirements will be determined in consultation with the relevant lease holders, and will include details relating to property identification, start and end dates of the lease, related fees, and other pertinent details.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 92 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

5 PERMANENT CLOSURE AND RECLAMATION

5.1 DEFINITION OF PERMANENT CLOSURE AND RECLAMATION

Permanent closure is defined in the MVLWB Guidelines for the Closure and Reclamation of Advanced Mineral Exploration and Mine Sites in the Northwest Territories (MVLWB/AANDC 2013) as follows:

“Permanent closure is the final closure of a mine site with no foreseeable intent by the existing proponent to return to either active exploration or mining.”

Reclamation is defined in the MVLWB Guidelines as follows:

“The process of returning a disturbed site to its natural state or which prepares it for other productive uses that prevents or minimizes any adverse effects on the environment or threats to human health and safety.”

Baffinland acknowledges that due to various economic drivers (commodity prices, escalation of construction and production costs, extended maintenance shutdown, others), Baffinland may be forced into a temporary or permanent closure scenario. For planning purposes, Baffinland defines two types of temporary closure as follows:

- **Short-term Closure (described in Sections 7.1 and 7.2):** Cease commercial operation for a period of up to one (1) year while maintaining all equipment and facilities in a state of readiness to resume operation with minimal delay or have project components at the ready for use to support closure activities.
- **Long-term Closure (described in Sections 7.3 and 7.4):** Extension of a short-term closure to over (1) year for an indefinite period while all Project sites are maintained in a secure condition and all facilities and equipment are de-energized and winterized until the operation resumes or the site is reclaimed as part of permanent closure.

Consideration of future land use is an important closure principle in the continuous refinement of this ICRP. To date, on going and future land use has been considered in numerous aspects of the mine planning, such as:

- Adopting environmental management best practices during mining to reduce impacts where possible;
- Accomodating certain Inuit requests for participating in environmental monitoring efforts (e.g. Ship Observer Program)
- Development of additional management plans to address specific land user concerns (e.g. ballast water management);

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 93 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

- Major project considerations such as the avoidance of winter shipping during operations, the alignment of the North Railway in relation to outpost camps as well as hunting and travelling routes;
- Facilitating travel through the Northern Transportation Corridor, including the Tote Road, during mining operations;
- Various planned reclamation activities which are not required to establish physical and chemical stability, such as:
 - Scarification to promote natural revegetation,
 - Removal of above-grade buildings, and
 - Re-establishing pre-existing drainage pathways where practical.
- Clean up of pre-existing waste (e.g. non-hazardous debris and hazardous waste storage areas) at Mary River.

Moving forward Baffinland will seek further input from communities on potential closure options that promote the desired post-closure land use. Feedback via engagement activities will be compiled and considered within the MCWG to identify feasible options that can be incorporated into future revisions of the ICRP. Baffinland has committed to several closure objectives focusing on land use, which are presented in Table 5.1.

In keeping with the closure principles, the objectives and criteria presented below avoid introducing designs which would require long-term active care. This closure principle was adopted with the inclusion of the MVLWB Guidelines following the preparation of the PCRP and FEIS process, resulting in a modified closure approach at the Open Pit from long-term passive flooding to include a combination of natural flooding and pumping.

5.1.1 CLOSURE OBJECTIVES AND CRITERIA

A description of the closure criteria and applicable monitoring program that is proposed to be implemented to confirm that the objectives were met for each Project component is summarized in Table 5.1 for permanent and temporary closure. In addition to the specific criteria listed below to measure reclamation success, QIA's approval is also required to achieve mine closure as a condition of the Commercial Lease (Q13C301).

As the Project is in the initial years of operations, closure planning is expected to be refined over time using findings from engagement efforts (e.g. MCWG), site-specific operational knowledge, environmental monitoring programs, progressive reclamation, and reclamation research studies.

An important aspect of ongoing closure planning will be periodic assessment of predicted impacts to the biophysical environment, and the assumed reclamation performance for planned closure activities. This process will reduce uncertainties in post closure conditions and allow for increasing detail in the closure

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 94 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

design leading up to a FCRP. As outlined in the Project Certificate No 005, one of the primary purposes of the NIRB Monitoring Program for the Project is to assess the accuracy of predictions contained in the environmental impact statements. As a result, the findings of Baffinland's ongoing monitoring and management plans are compared to the predictions made as part of the FEIS and the ERP on a continual basis within the NIRB annual reporting process which allows for comment by Project stakeholders. Tracking and understanding of project impacts/effects is also a focus of the Marine and Terrestrial Environment Working Groups (MEWG, TEWG). These processes and groups are expected to play important roles in informing ongoing closure planning and ICRP updates.

Table 5.1: Closure Objectives, Criteria and Actions by Major Project Components

Project Component	Closure Objectives	Closure Criteria	Actions/Measurements
Site Wide ²	Drainage pathways for surface runoff are physically stable to limit risk to humans and receiving environment ¹ .	Drainage pathways will be designed by a professional engineer for long-term stability to mitigate against erosion. No significant signs of deformation, degradation and/or erosion and sedimentation which could contribute to physically unstable conditions as visually observed during geotechnical inspections by a qualified professional engineer. Inspection criteria and schedule will be refined based on the final engineering designs for site grading and specific engineered drainage controls.	Geotechnical assessment, analysis and/or monitoring of the drainage pathways will occur as part of the Geotechnical/Engineering Monitoring Program (Section 9.2). Surface water quality monitoring will be completed post-closure at applicable drainage pathways to ensure all relevant closure objectives and criteria have been met. See closure objective relating to Site Wide Surface Water.
	Mine areas are physically stable for use by humans and receiving environment ¹ .	No significant signs of deformation or degradation at remaining engineered structures and/or other disturbed areas which could contribute to physically unstable conditions. This will be confirmed by visual monitoring as part of site geotechnical inspections. Inspection criteria and will be refined based on the post closure stability assessment for remaining mine structures and Final Grading Plan.	Geotechnical assessment, analysis and/or monitoring of the mine areas will occur as part of the Geotechnical/Engineering Monitoring Program (Section 9.2). The expected level of effort associated with the different mine areas is included in Section 9. Monitoring scope and duration will be informed by operational performance results where possible, and detailed in the final grading and engineering designs for remaining structures.
	Surface water runoff and seepage that is safe for humans and the receiving environment ¹ .	Closure water quality meets Type A Water Licence effluent criteria, territorial/federal guidelines, MDMER, and/or site-specific risk-based criteria, as relevant to the specific mine areas and components. At present, water quality predictions for the Open Pit and Waste Rock Stockpile discharges and receiving waterbodies indicate that risk based criteria and/or risk management strategies may be required. Criteria will be refined based on water quality monitoring results during operations and research studies.	Monitoring activities as part of the Closure and Post-Closure Aquatic Monitoring and Reporting Program. Specific testing parameters, frequencies, locations and program durations will be refined over time based on findings of operational monitoring programs and research studies.
	Remaining area will be safe for humans and the receiving environment ¹ .	No buildings or equipment remain above surface grade following final closure (excluding Ore Docks and Tote Road). Completion of an approved Final Grading Plan that has considered input from MCWG. This criteria is supplemented by several other closure criteria focusing on additional aspects of closure (e.g. chemical and physical stability) Areas with risk to humans, terrestrial wildlife and/or aquatic biota will be managed to reduce hazards to an acceptable level. These criteria will be refined based on the results of planned research studies. Additional, more specific criteria may be added prior to closure to focus on activities such as fish consumption and drinking water quality in particular areas of interest (e.g. Mary’s River, Sheardown Lake). These additions will require updated residual effect predictions.	Geotechnical assessment, analysis and/or monitoring of the mine areas will occur as part of the Geotechnical/Engineering Monitoring Program (Section 9.2). The expected level of effort associated with the different mine areas is included in Section 9. Monitoring activities as part of the Closure and Post Closure Aquatic Monitoring and Reporting Program and Post-Closure Fauna and Flora Monitoring Final inspection by a qualified professional³ and representative of Designated Inuit Organization.

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Table 5.1: Closure Objectives, Criteria and Actions by Major Project Components

Project Component	Closure Objectives	Closure Criteria	Actions/Measurements
Site Wide ² (continued)	Area facilitates the desired wildlife movement	Completion of an approved Final Grading Plan that has considered input from MCWG. To the extent possible, disturbed areas to be scarified to promote natural revegetation. Use of the site by wildlife (i.e. birds, mammals) will be consistent with FEIS, or updated predictions. Detailed metrics will be developed in concert with MCWG and included in the FCRP. Current residual effect predictions for individual wildlife and specific site areas are presented in Appendix G.	Geotechnical assessment, analysis and/or monitoring of the mine areas will occur as part of the Geotechnical/Engineering Monitoring Program (Section 9.2). The expected level of effort associated with the different mine areas is included in Section 9.2 Final inspection by a qualified professional ³ and representative of Designated Inuit Organization. Post closure flora and fauna monitoring (Section 9.5) will address selected metrics to assess wildlife presence and use in comparison with FEIS or updated impact predictions.
	Air quality safe for humans and wildlife	Mean Total Suspended Particulate concentrations and PM 2.5 closure criteria will be developed based on site-specific risk based criteria, in consideration of the NU Ambient Air Quality Standard).	Post-closure dustfall and active ambient monitoring at appropriate locations, for a limited duration post-closure as part of the Air Quality Monitoring Program (Section 9.9)
	Natural revegetation is promoted	Grading and scarification completed as outlined by an approved Final Grading Plan. Baffinland has committed to completing reclamation activities that will promote natural revegetation over long timelines, but specific criteria or goals for vegetation growth post-closure are not planned.	Final inspection by a qualified professional ³ and representative of Designated Inuit Organization.
	Aesthetic conditions of the project areas are similar to surrounding natural conditions	No visible buildings, equipment, or non-local materials. This excludes structures remaining at, and below grade (i.e. concrete foundations) and those which stakeholders have agreed should remain post closure, such as the Ore Dock, Tote Road, and select water crossing abutments. Final grading reflects surrounding topography where possible (i.e. limit steep slopes) and re-establish pre-existing drainage pathways. Activities to promote natural revegetation to the extent possible as outlined in the Final Grading Plan. Criteria may be refined through discussions in the MCWG.	Final inspection by a qualified professional ³ and representative of Designated I nuit Organization.
	Inuit-defined Objectives		

Table 5.1: Closure Objectives, Criteria and Actions by Major Project Components

Project Component	Closure Objectives	Closure Criteria	Actions/Measurements
Open Pit and Mine Workings (including spillway to remain post closure)	Physically stable Open Pit Mine Workings and Spillway to limit risk of failure that could impact humans and receiving environment ¹ .	Final Open Pit, mine workings and spillway are within final long-term stability assessment assumptions/design constraints. No visual indications of significant deformation and degradation is observed during final inspections by a professional engineer. Inspection/monitoring criteria and schedule will be refined based on the final engineering assessments.	Geotechnical assessment, analysis and/or monitoring of the Open Pit, mine workings and spillway will occur as part of the Geotechnical/ Engineering Monitoring Program (Section 9.2). The expected level of effort associated with the different mine areas is included in Section 9.2 Final inspection completed by Inspector of Mines (WSCC).
	Open Pit Lake water quality is not a risk to humans and receiving environment ¹	The FEIS predictions for pit water quality indicate that there could be potential exceedances for substances that could cause a risk to humans (such as mercury) and the receiving environment (Appendix H, Table 4). To understand this potential risk and mitigation/management options further, Baffinland plans to refine the Pit flooding estimates and water quality predictions in the future using site data. This work is required to develop meaningful criteria.	Monitoring activities as part of the Closure and Post Closure Aquatic Monitoring and Reporting Program and Post-Closure Fauna and Flora Monitoring Specific testing parameters, frequencies, locations and program durations will be developed over time based on findings of operational monitoring programs and pit flooding and water quality research studies (Appendix D).
	Surface runoff and seepage water quality is safe for humans and receiving environment ¹ .	Achieve "Recognized Closed Mine" status per Section 4 of MDMER. Effluent discharge quality is consistent or improved from the initial FEIS predictions. To understand this potential risk and mitigation/management options further, Baffinland plans to refine the Pit flooding estimates and water quality predictions in the future using site data. This work is required to develop meaningful criteria.	Monitoring activities as part of the Closure and Post Closure Aquatic Monitoring and Reporting Program and Post-Closure Fauna and Flora Monitoring Specific testing parameters, frequencies, locations and program durations will be developed over time based on findings of operational monitoring programs and pit flooding and water quality research studies (Appendix D).
	Inuit defined Objectives		
Waste Rock Stockpile	Physically stable Waste Rock Stockpile and to limit risk of failure that would impact humans and receiving environment ¹ .	Final Waste Rock Stockpile is within final long-term stability assessment assumptions/design constraints. No visual indications of significant deformation and degradation is observed during final inspections by a professional engineer. Inspection/monitoring criteria and schedule will be refined based on the final engineering assessments.	Geotechnical assessment, analysis and/or monitoring of the Waste Rock Stockpile will occur as part of the Geotechnical/Engineering Monitoring Program (Section 9.2). The expected level of effort associated with the different mine areas is included in Section 9.2
	Chemically stable Waste Rock Stockpile to limit risk of failure that would impact humans and receiving environment ¹ .	Confirmation of PAG placement has occurred as outlined in the approved management plans. Golder (2018) outlines the current deposition strategy. Effluent discharge quality is consistent, or improved from FEIS predictions. Achieve "Recognized Closed Mine" status per Section 4 of MDMER. To understand this potential risk and mitigation/management options further, Baffinland plans to refine the water quality predictions in the future using site data. This work is required to develop meaningful criteria.	As-built drawing and confirmatory geochemical sampling results (confirming PAG placement) is deemed acceptable by a professional engineer. Monitoring activities as part of the Closure and Post Closure Aquatic Monitoring Program. Specific testing parameters, frequencies, locations and program durations will be developed over time based on findings of operational monitoring programs and pit flooding and water quality research studies (Appendix D).

Table 5.1: Closure Objectives, Criteria and Actions by Major Project Components

Project Component	Closure Objectives	Closure Criteria	Actions/Measurements
	Inuit defined Objectives		

Table 5.1: Closure Objectives, Criteria and Actions by Major Project Components

Project Component	Closure Objectives	Closure Criteria	Actions/Measurements
nfrastructure and Ancillary Areas Subcomponents: - Quarries and Stockpiles - Buildings and Equipment - Mine Infrastructure (e.g. pads and laydowns, secondary roads, airstrip, crusher) - Transportation Routes (Tote Road, North Railway, South Railway, and Docks) - Waste Management Areas (e.g. landfarms and landfills) - Water Management Areas (water treatment systems, settling ponds, pit dewatering system) - Quarries and borrow areas	Physically stable disturbed areas to limit risk of failure that would impact humans and receiving environment ¹	No significant signs of deformation or degradation at remaining engineered structures (e.g. Tote Road sections and select abutments at water crossings, Ore Docks) and/or other disturbed areas (e.g. quarries, laydowns, decommissioned landfills and landfarms) which could contribute to physically unstable conditions. This will be confirmed by visual monitoring as part of site geotechnical inspections. Surface contouring at disturbed areas is completed as outlined in an approved Final Grading Plan.	Geotechnical assessment, analysis and/or monitoring of the infrastructure and ancillary areas will occur as part of the Geotechnical/Engineering Monitoring Program (Section 9.2). The expected level of effort associated with the different mine areas is included in Section 9.2
	Chemically stable disturbed areas to limit risk impact to humans and receiving environment ¹	Chemical contaminant sources are removed from site. Residual soils meet federal/territorial soil quality guidelines or site-specific risk based criteria as required (CCME agricultural is assumed at this time). If soil exceeds the adopted criteria it will be removed or risk managed to the satisfaction of a qualified professional ³ to achieve protection of ecological and human health. For areas such as quarries and landfills that will have runoff, closure runoff water quality meets territorial/federal guidelines and/or site-specific risk-based criteria. Mine areas subject to MDMER (e.g. Crusher area).	Post Closure Site Assessment will include an ESA component at potentially impacted areas (e.g. equipment and fuel storage areas). If required, HHRA would also be undertaken. Monitoring activities as part of the Closure and Post Closure Aquatic Monitoring Program. Specific testing parameters, frequencies, locations and program durations will be refined over time based on findings of operational monitoring programs and research studies.
	Inuit defined Objectives		

Notes:

¹Receiving Environment – includes aquatic (freshwater and marine) biota and terrestrial biota.

²Site Wide project component – Discussion under this heading includes all project areas.

³Qualified Professional assumes a minimum of 3 years experience in the relevant field.

No closure activities are anticipated for the marine environment, consequently no specific closure objectives have been included. Future updates here may be completed as informed by the MEWG.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 100 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

5.2 PERMANENT CLOSURE AND RECLAMATION REQUIREMENTS

The closure and reclamation approach for the Project was developed on the basis of:

- MVLWB/AANDC Guidelines for the Closure and Reclamation of Advanced Mineral Exploration and Mine Sites in the NWT (MVLWB/AANDC, 2013); and
- QIA Abandonment and Reclamation Policy for Inuit Owned Lands (2013).

It adheres to generally-accepted rehabilitation criteria and focuses on both physical and chemical stabilization of the site. Land disturbances not needed to support active operations will be concurrently reclaimed.

The main work items for final mine closure and reclamation include:

- Filling the open pit with water to stabilize the pit walls and mitigate falling hazards.
- Installation of a boulder fence and signage around the open pit to prevent inadvertent access.
- Removal of all mining and transportation infrastructure other than the Open Pit, Waste Rock Pile, Milne Port Tote Road, and Milne Port Docks. The Milne Port Tote Road and Docks will be left in place after the Project life, but not maintained.
- Demolition and removal of all buildings and foundations.
- All mining materials and equipment will either be removed from site or disposed of in on-site landfills/approved waste disposal areas.
- Removal of all hazardous materials and wastes will be removed from site to licensed disposal facilities.
- Storage of non-hazardous wastes on site.
- Capping of all landfills and other disposal areas.
- Removal of water management systems and infilling of mine water ponds.
- Roads, railways, airstrips, and development areas will be re-contoured as required to provide long-term stability and reduce the potential for erosion.
- Removal of water crossings and regrading of disturbed project areas to restore natural drainage patterns.
- Scarification of disturbed areas of former mine infrastructure to encourage natural revegetation.
- Monitoring during closure and post closure up until the post-closure site assessment shows that the closure works been successful in meeting the closure criteria.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 101 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

These following sub-sections describe each of the mine components, how they are to be rehabilitated and what options were considered, what uncertainties there are with respect to the closure and management, monitoring of the project component following closure.

Project components will be considered closed and reclaimed when closure criteria outlined in Section 5.1.1 are met. As the Project advances through the detailed design phase, changes to the Project may occur that will alter the Interim Mine Closure and Reclamation Plan. Though changes may occur, at this time it is anticipated that the major components of the Project will remain the same.

5.2.1 OPEN PIT MINE WORKINGS

5.2.1.1 PROJECT COMPONENT DESCRIPTION

Mining commenced on a hill crest outcrop, and will progress until Year 10 to 12 of operation at full production volume (based on a nominal 21.5 Mtpa) before an open pit is formed. The mine plans call for conventional open-pit mining methods utilizing 7.5 m benches.

Ore is delivered to the primary crusher (discussed in Section 5.2.5) located south of the deposit via the east main haul road.

The general configuration of the mine pit, haul road and waste rock dump is presented in Figure 5.1.

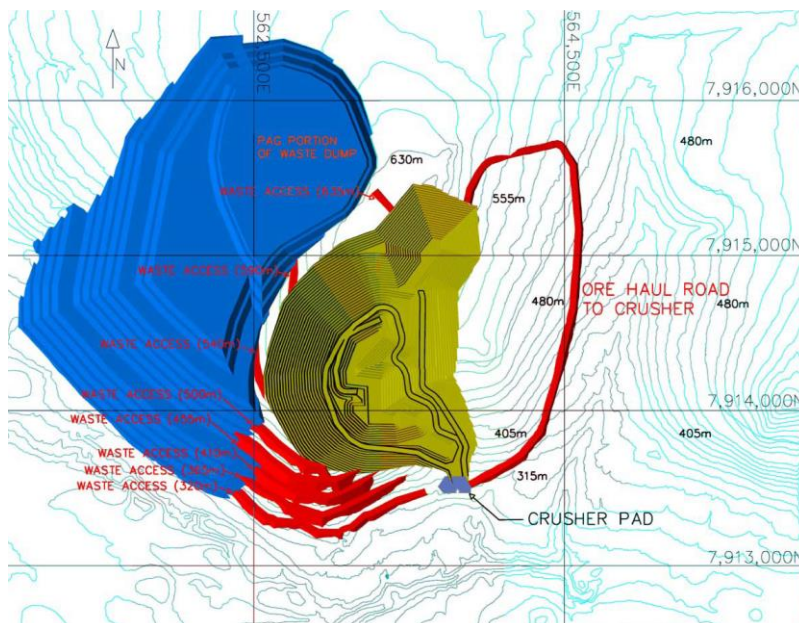


Figure 5.1 General Layout and Development Of Deposit 1 Pit

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 102 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

5.2.1.2 PRE-DISTURBANCE, EXISTING, AND FINAL SITE CONDITIONS

The pre-disturbance site conditions are summarized in Section 3. The current mine workings are free draining and there is no open pit, rather there are the development of benches on the hillside that are largely free draining. Appendix C provides a photolog showing the current mining operations.

The final site condition of the open pit will be a pit lake that drains to the natural environment through the spillway and natural drainage from the southeast corner of the open pit (KP 2008). It is anticipated that the discharge from the open pit will not require treatment (AMEC 2010), although there is some uncertainty in this prediction and consequently Baffinland has identified this as a focus of their Reclamation Research Program (Appendix D).

The predictions of residual environmental effects presented in the FEIS assumed that upon cessation of operations, the perimeter of the open pit would be barricaded and remain restricted. The need for this restriction is uncertain, and will be assessed during ongoing closure planning.

5.2.1.3 CLOSURE OBJECTIVES AND CRITERIA

The closure objectives are presented in Section 5.1.1 and closure criteria are presented in Table 5.1.

5.2.1.4 CONSIDERATION OF CLOSURE OPTIONS AND SELECTION OF CLOSURE ACTIVITIES

BIML considered two options to address the closure objectives for the Open Pit, including (ensuring the site is physically stable against pit wall slope failure and mitigating the falling risk the void poses to humans and wildlife), including:

- Backfilling the open pit with waste rock; and
- Filling the pit with water (flooding).

Backfilling of open pits at closure is rarely conducted at mine sites due to the high cost even when sufficient materials are present on the property. The open pit at final closure will have an estimated volume of 43,400,000 m³ below the lip of the pit, and backfilling this volume of material into the pit is not considered economically viable.

Flooding the pit was found to be more economically viable. The timeline for this process is uncertain, but preliminary estimates suggest that passive pit flooding with water from natural sources such as seepage into the pit, direct precipitation and surface runoff may take between 85 to 150 years (KP 2008). An enhanced pit filling alternative (i.e. active pumping) has also been assessed and suggests that pit filling could be completed in as few as 2 years. This is discussed below in greater detail.

The mining plan and the ongoing waste rock characterization plan will inform the prediction modeling of the mine pit water quality at the end of mine life. Should the modeling indicate potential exceedance of water quality objectives due to prolonged oxidation of the pit walls, alternative pit filling scenarios will be considered to mitigate this effect, including accelerated pit filling. The discussion below regarding

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 103 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

accelerated pit filling is largely theoretical as there will be significant limitations and challenges to undertaking an ongoing, year-round pumping operation on the scale that would be required.

Enhanced Pit Filling Alternative

The filling of the pit can be accelerated via pumping water from a nearby water source – thereby complementing the accumulation of natural precipitation and ground water accumulation.

Assisted pit filling is governed by two parameters – technical limitations that drive pumping costs and water source locations/drawdown limits. Costs are driven by materials and equipment required for the operation (e.g., heat-traced piping, pumps, generators, and fuel requirements) as well as the construction and maintenance of the necessary roads and berms. Pumping water to the pit is uphill and therefore significant elevation head will provide technical challenges to any pumping design. Water source drawdown limits are designed to ensure that the volume of water extracted from a given source does not significantly lower the water table and has minimal impact on the aquatic ecosystem. Key factors to consider when calculating maximum acceptable drawdown of a lake include: potential spawning habitat as well as the residency time of the water body. The Department of Fisheries and Oceans (DFO) – Protocol for Winter Water Withdrawal from Ice-covered water bodies in the Northwest Territories and Nunavut, 2010 recommends, in the absence of a waterbody-specific assessment, that water withdrawals should not exceed 10% of the under ice lake water volume. Using this guidance as a proxy, Baffinland evaluated potential lake water sources for pit filling using annual water withdrawal of 10% of the total lake volume. Another consideration is distance to the pit and level terrain, in order to reduce pumping costs.

The Project pit has identified four potential water sources that can theoretically be used for filling the pit – Sheardown Lake, Camp Lake, Mary Lake and Mary River. This information is summarized in Table 5.2.

Table 5.2: Potential Water Source Pit Fill Data (Conceptual Level)

Water Source	Pumping Distance	Total Volume/ Annual Flow (m³)	Permissible Annual Water Take (m³)	Number of Years to Fill Pit
Sheardown Lake (NW Basin)	2 km	8,175,410 ¹	820,000	53
Camp Lake	4.7 km	27,511,100 ²	3,000,000	15
Mary Lake	12 km	169,606,250 ³	11,200,000	4
Mary River (at MR-12, east pond discharge location)	< 1 km	78,185,678 (mean) ⁴ 53,166,261 (10-year dry) ⁴	23,000,000 (30% of Mean Annual Discharge)	2

Source:

1. Based on Mary River Project FEIS, Appendix 7C, Figure 4.1-3
2. Based on Mary River Project FEIS, Appendix 7C, Figure 4.1-1
3. Based on Mary River Project FEIS, Appendix 7C, Figure 4.1-7
4. Based on Mary River Project FEIS, Volume 7, Table 7-3.18 – Calculated from the Mary River MAD plus annual inputs from the east pond

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 104 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Sheardown Lake and Camp Lake are closer to the proposed final pit at a distance of 2 km and 4.7 km respectively, as opposed to Mary Lake which sits at a distance of 12 km from the pit. This results in Sheardown and Camp Lakes having shorter pumping distances than Mary Lake. Unfortunately, Sheardown and Camp Lakes have total volumes of 8,175,410 m³ and 29,690,200 m³, allowing to draw maximum volumes of only 820,000 m³ and 3,000,000 m³ per annum, thus resulting in a total theoretical pit fill times of 53 and 15 years respectively. In addition to this, Sheardown and Camp Lakes have a very long “residence” time for the water in the lake to completely recycle itself. As a result, it may be necessary to draw even less than 10% of the total lake volume in order to ensure no significant impact to the Sheardown or Camp Lake ecosystem.

The main basin of Mary Lake has a volume of 112,000,000 m³ providing a total draw volume of 11,200,000 m³ per annum. Assuming the maximum available volume of water is drawn this will result in a pit fill time of approximately four (4) years. In addition to this Mary Lake has a very high recharge rate completely “recycling” approximately every 1.5 years – resulting in minimal impact to the lakes ecosystem. Unfortunately, Mary Lake is located 12 km from the pit, which would result in substantial pumping costs and technical challenges – which are not expected to be economically feasible.

The Mary River offers the fourth pit filling alternative. DFO (2010) provides guidance on determining ecological flow requirements to establish water withdrawal volumes and rates that are not expected to have an impact. Withdrawals greater than 10% of the instantaneous flow and 30% of the Mean Annual Discharge (MAD) require rigorous assessment. To determine the potential viability of Mary River as a water source, 30% of the MAD has been applied in Table 5.2 to establish a 2-year pit filling period. Pumping may not be possible in low flow years. Between approximately 60 to 70% of the annual flow in the Mary River occurs during a 30 to 35 day freshet period in most years, so much of the annual withdrawal would need to take place during this brief period. Given the shorter length of pipeline, Mary River would likely be the preferred option for pit filling, subject to further study.

Periodic pumping involves pumping from the Mary River during the summer months only, when ice cover is not an issue. This period, June to September provides us with a maximum four month pumping window. Pumping during this time is essential as Mary River freezes solid during the winter months. Warm weather pumping also reduces the cost of constructing and maintaining a pipeline.

Assuming pumping continues 24 hours a day for the entire summer period this would require a pumping system that could deliver 8,700 m³/hour, over approximately a 1 km distance and an approximate elevation head of 200 m. During the winter months the pump and pipeline would be drained and locked out to ensure that the equipment is not damaged by the winter conditions.

Continuous pumping assumes that water will be pumped to the Mine Site pit 24 hours a day all year long. Mary River is not an option for this scenario as it freezes during the winter, leaving Mary Lake the only

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 105 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

option for continuous pumping. Technical and economic feasibility is unlikely assuming 24-hour continuous pumping with no delays or malfunctions for the entire year at a pumping rate of 1,300 m³/hour, over a 12 km distance and 250 m elevation head.

Over winter pumping also presents other challenges including: the heating of pipelines, snow removal, ice removal from discharge and intake points, extreme weather conditions, increased maintenance costs and risk to personnel. Given these conditions it is expected that continuous pumping would not be a technically and economically feasible option.

5.2.1.5 ENGINEERING WORK ASSOCIATED WITH CLOSURE ACTIVITY

The main work items for closing the open pit are as follows:

- Conducting an engineering stability analysis to confirm the long-term stability of the pit walls;
- Barricading the ramps into the pit, construction of a perimeter boulder fence (or equivalent), and installation of hazard signage to mitigate the potential for inadvertent access;
- Removal of dewatering infrastructure used during operation (i.e., pumps, surge box and pipelines);
- Cleanup of any soil contamination (i.e. hydrocarbons, etc.) – see Section 9.6;
- Filling the open pit with water, either naturally or by enhanced filling; and
- Construction of a spillway at the southeast corner of the Open Pit.

The proposed closure activities for the open pit suggest that the open pit be allowed to naturally flood to form a “pit lake”. At closure, inert wastes (i.e., material having insignificant leachability and pollution content) may be disposed of in the open pit. It is anticipated that the open pit will take an estimated 85 to 150 years to passively fill with water from natural sources such as seepage into the pit, direct precipitation and surface runoff (KP 2008). There are a number of different potential scenarios for accelerating the pit filling which are presented above in Section 5.2.1.4. These will be further assessed prior to final closure as discussed in Appendix D.

Once the open pit fills to the point of overflow, pit drainage will enter the natural environment through the spillway and natural drainage from the southeast corner of the open pit (KP 2008), eventually reaching the receiving waters of Mary River. It is currently anticipated that the discharge from the open pit will not require treatment (AMEC 2010). However, if treatment is required several effective technologies are currently available to manage metal leaching and/or acid rock drainage (ML/ARD). If ML/ARD were to develop, batch treatments will be carried out to adjust the pH and/or metal concentrations of the water in the pit so that it meets discharge requirements before overflow into the environment. Contingencies are discussed in more detail in Section 5.2.1.9. The overflow location at the southeast area of the pit will provide emergency access to and from the open pit/pit lake.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 106 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

5.2.1.6 PREDICTED RESIDUAL EFFECTS

The predicted residual effects at planned closure, including those encompassing the open pit mine workings, were assessed as part of the FEIS with respect to VEC/VSEC. These effects, and the methods for their assessment are summarized in Appendix G.

As the project progresses, data will be collected through the environmental monitoring programs which can provide an indication of the accuracy of the predicted effects. These data can also be used to give an indication of the performance of the site mitigative measures and management systems, used as the basis for revising the prediction of residual effects, or implementing adaptive management.

5.2.1.7 UNCERTAINTIES

As noted in Section 5.2.1.4, there is uncertainty as to the long-term water quality in the open pit. Baffinland will conduct monitoring and research as necessary to resolve uncertainties pertaining to residual effect assessments and environmental risks that may have closure implications. Uncertainties related to the open pit mine workings include whether or not there is potential for the generation of ML/ARD from the contact of water with the final pit. The mining plan and the ongoing geochemical characterization plan will inform the prediction modelling for mine pit water quality at the end of mine life as presented in the Life-of-Mine Waste Rock Management Plan (Appendix 5 , BAF-PH1-830-P16-0031) and Section 5.2.1.8, Appendix D of the FEIS.

This uncertainty has been highlighted by stakeholders and Baffinland has committed to addressing the concern within the Reclamation Research Plan and adaptive management during operations (e.g. Waste Rock Facility effluent monitoring and mitigation). A detailed description of the planned research is presented in Appendix D.

There is uncertainty regarding the infilling rate of the open pit. There are two proposed options for options for pit infilling, natural flooding and enhanced pit filling (which uses pumps from nearby lakes. For both methods, the total time to flood the pit is uncertain, and for the enhanced pit filling alternative, the source for the water for flooding has only been identified at a conceptual level. This concern has been highlighted by stakeholders, and Baffinland will proactively address this issue within the Reclamation Research Plan. A detailed description of the planned research is presented in Appendix D.

5.2.1.8 POST CLOSURE MONITORING, MAINTENANCE AND REPORTING

Conceptual modelling of the pit water quality is presented in the Mary River Project FEIS. Open pit monitoring will be done throughout of the life of the Project as per the Type A Water Licence and in accordance with MDMER requirements. Predictions of pit water quality will be updated throughout the life of the Project as more information comes available on the geochemistry of the waste rock and the pit wall. Although indications to-date demonstrate a low probability of ML/ARD, if monitoring results during Operations suggest a potential ML/ARD it shall be dealt with at that time and any associated impacts that ARD and/or ML would have on closure and reclamation planning, monitoring, Long-term maintenance

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 107 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

and bonding will be addressed. If there are no indications from test programs or ongoing monitoring of ML/ARD throughout the Operation Phase, at final closure the open pit will be inspected by a qualified engineering professional to assess the physical stability of the pit walls and pit lake and to reconfirm no indicators of ML/ARD.

ARD and ML will be periodically reassessed as a potential issue in the future ICRP revisions and in the Final MCRP. The Final MCRP will present a time frame for the potential development of ML/ARD conditions, if any, and discuss the impact of ML/ARD release on final closure identifying the need for ongoing monitoring, treatment, and potential mitigations

Post-closure monitoring of open pit mine workings includes geotechnical/engineering monitoring (Section 9.2), aquatic monitoring (Section 9.3), Environmental Site Assessment (Section 9.4), fauna and flora monitoring (Section 9.5), and safety compliance inspection (Section 9.7). Maintenance required will depend on the outcome of the monitoring programs, and would be completed as outlined in Section 9. Baffinland will report on the results of all monitoring programs on an annual basis to the NIRB (as per Project Certificate No. 005 and its Amendment), AANDC Land Lease 47H/16-1-2, the NWB (as per Type 'A' Water Licence 2AM-MYR-1325 Amendment No. 1) and the Land Owners (as per Commercial Lease Q13C301).

5.2.1.9 CONTINGENCIES

Conceptual modelling of the pit water quality is presented in the Life-of-Mine Waste Rock Management Plan (Appendix 5, BAF-PH1830-P16-0031). Open pit monitoring will be done throughout of the life of the Project as per Type A Water Licence Amendment No. 1 requirements and in accordance with MDMER requirements. Predictions of pit water quality will be periodically updated throughout the life of the Project as more information becomes available on the geochemistry of the waste rock and the pit wall. Although indications to-date demonstrate a low probability of ML/ARD, in the event that ongoing water quality modelling or field monitoring shows a trend toward exceedance of discharge requirements, then water treatment options will be determined and implemented. Details regarding theoretical treatment options are provided in the Life-of-Mine Waste Rock Management Plan (Section, 3.6.4, BAF-PH1830-P16-0031) and were considered for both metal and ammonia/nitrate removal. Theoretical treatment options for metals removal included:

- Resins
- Polymer Addition
- Sodium Hydrosulfite Treatment
- Ozonation
- Biofilters-Sulphide Precipitation
- Activated Carbon

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 108 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

- Lime Precipitation

Theoretical treatment options for ammonia/nitrate removal include:

- Biological De-nitrification (for removal of both ammonia and nitrate)
- Ion Exchange
- Electro-Chemical Ion Exchange
- Breakpoint Chlorination of Ammonia

If there are no indications from test programs or ongoing monitoring of ML/ARD throughout the Operation Phase, at final closure, the open pit will be inspected by a qualified engineering professional to assess the physical stability of the pit walls and pit lake and to reconfirm no indicators of ML/ARD.

ML/ARD will be periodically reassessed as a potential issue in the future ICRP revisions and in the Final CRP. Reclamation Research to address the uncertainty of what closure and post closure activities are required to ensure open pit runoff water quality meets closure objectives and criteria, including ML/ARD issues, is expected to commence at approximately Year 10 of Operations (when an Open Pit is expected to exist associated with the Project). Based results of this research, the ICRP will be updated to present a time frame for the potential development of ML/ARD conditions, if any, and discuss the impact of ML/ARD release on final closure identifying the need for ongoing monitoring, treatment, and potential mitigations.

5.2.2 WASTE ROCK AND OVERBURDEN PILES

5.2.2.1 PROJECT COMPONENT DESCRIPTION

A waste rock disposal area designed for permanent storage of waste rock is located north of the open pit. Based on the current mine plan, an estimated 600 Mt of waste rock and 30 Mt of overburden will be generated from the mining of Deposit No. 1.

The Waste Rock Stockpile design has sufficient capacity to stockpile the entire volume of waste produced by the mine plan. As described in Section 3.3.3, the majority (approximately 85%) of the LOM waste rock produced by the mine is anticipated to be non-potentially acid generating (Non-PAG).

Waste characterization, volume estimation, and monitoring of the Waste Rock ML/ARD is ongoing. The design of the waste rock facility will be updated periodically as necessary throughout the LOM.

The PAG, Non-PAG, and Overburden are handled as three separate streams and are placed in zones within the Waste Rock Facility. Figure 5.2 presents the distribution of PAG, non-PAG, and Overburden in the Waste Rock pile. Figure 5.3 presents the progressive development (construction steps) for the Waste Rock Pile.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 109 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

The deposition strategy for the water rock area is to promote permafrost aggradation. To support this natural process, the following guidelines for placement and development have been adopted:

- The pile will be constructed in lifts from the bottom up with lift and bench characteristics appropriate for the geotechnical conditions and waste handling equipment. These characteristics will be approved by Mine Operations.
- Waste rock placed within 25 m of the outer edge of the pile should be Non-PAG and be placed during the winter months in lifts of no greater than 2 to 3 m to help advection within the pile.
- A 2 to 3 m thermal barrier of Non-PAG waste rock will be placed during the winter months to the extent practical to protect the permafrost layer during the summer months and allow development of the permafrost into the pile.
- Prior to the placement of any Non-PAG rock on natural ground within 25 m of the outer edge of the pile, snow and non-frozen material will be removed from the footprint to the extent practical.
- PAG rock should all be placed in the same watershed in the waste rock pile (may be modified in future updates to the Waste Rock Management Plan).
- PAG waste rock placement will be segregated from non-PAG rock placement and the location of PAG material documented.
- Waste rock will be placed in lifts while minimizing the overall thickness of the unfrozen material.
- PAG waste rock should be deposited such that permafrost aggradation in the following seasons occurs to the extent practicable.
- The perimeter of the pile will be a minimum of 31 m from any natural water body.
- Haul ramps for the waste stockpile will be similar in design to those within the pit and will be approximately 20 m wide at maximum 10% grades.

The existing disposal area within the LOM WRF footprint is within the western watershed which drains into Camp Lake. For Phase 1, a pond was constructed to the north of the disposal area as well as collection and diversion ditches along the perimeter of the waste rock pile. Water is discharged from the pond to the Mary River watershed via a lay flat hose to convey the water to an existing water course draining into a tributary of Mary River.

The expanded footprint outlined in the Phase 1 Extension plan is also located in the western watershed up-gradient of the existing WRF and WRF pond. As part of the Phase 1 Extension, the existing WRF pond has been upgraded to accommodate the additional flows attributed to the footprint expansion. Collection ditches and diversion ditches are to be constructed considering the pile expansion; a water treatment system is built and is currently operational. Ongoing evaluation of the WRF and associated water management

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 110 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

network is completed by Baffinland and its consultants. The most up-to-date details are available in the Interim Waste Rock Management Plan (TSD 28, Appendix I of the Phase 2 Proposal).

Further phased surface water management (ditches and ponds) will be designed as mining progresses. All phases of the run off management system will be designed such that water discharged from the WRF will be in compliance with applicable water quality discharge criteria outlined in the Type A Water Licence and the MDMER.

Surface water collection systems consisting of collection channels, diversion channels and settlement ponds are implemented as part of the waste dump water management system. In addition to sediment control, these collection systems will minimize the introduction of water into the waste dump foundations, where standing water may adversely affect the thermal regime and, therefore, chemical stability. Runoff water quality will be monitored. Discharge from the sedimentation ponds will be channeled to the Camp Lake Tributary (West pond) and to Mary River (East pond). Figure 5.4 presents the drainage features of the Waste Rock Pile.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 111 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

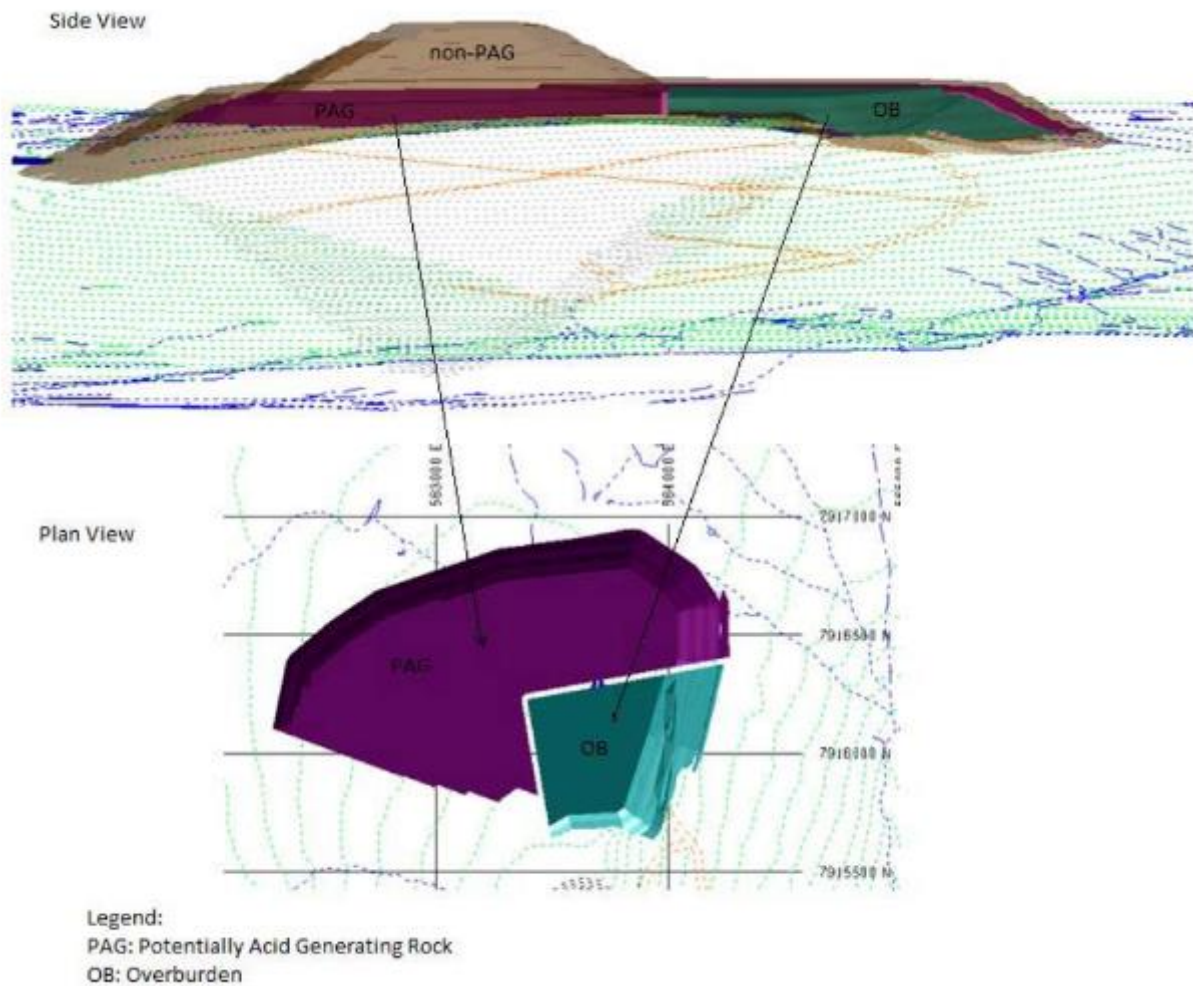


Figure 5.2 Placement of Waste Rock and Overburden

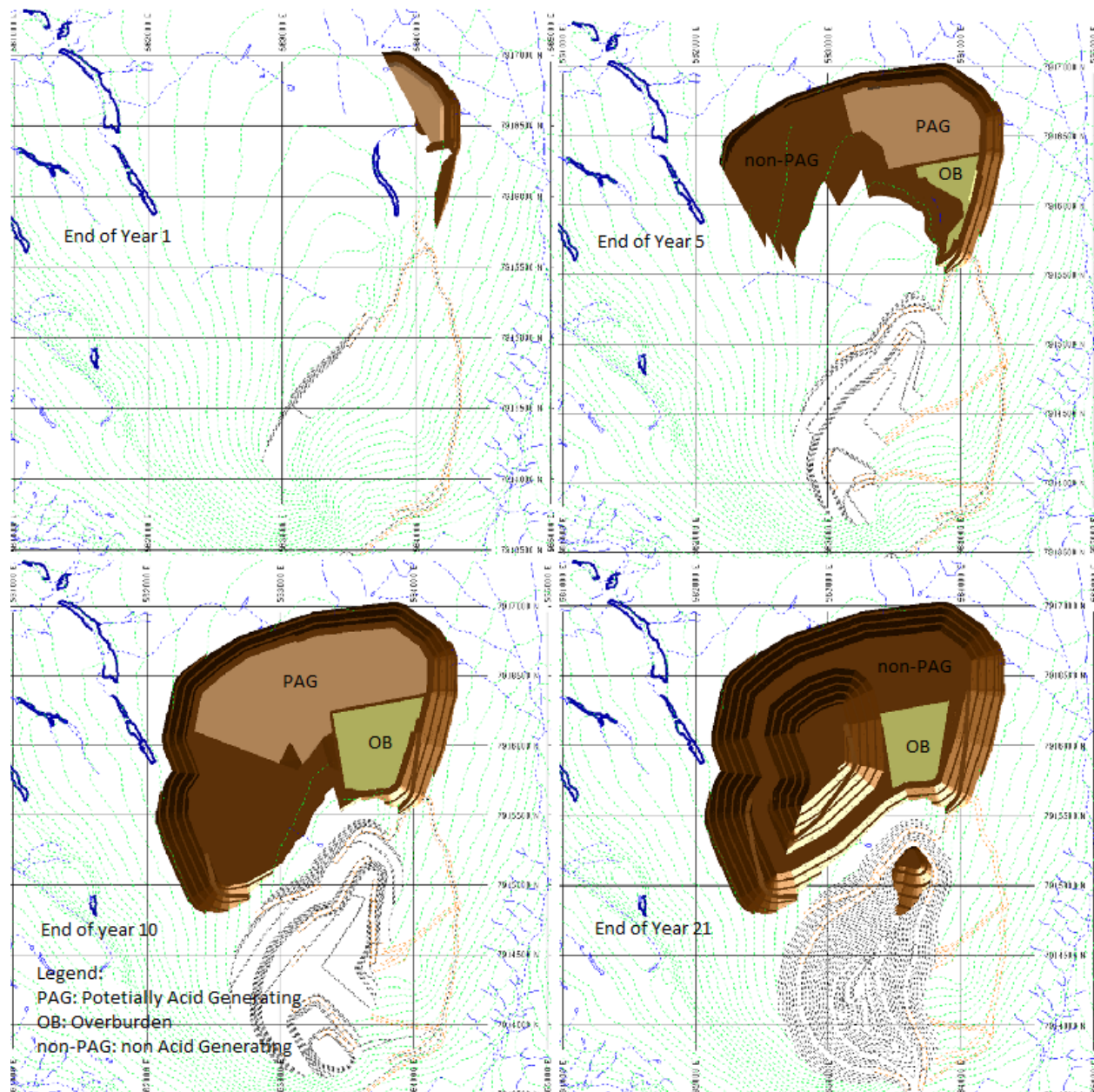


Figure 5.3 Evolution of the Waste Rock Stockpile Over the Life-Of-Mine

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 113 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	



Figure 5.4 Water Management Structures for the Waste Rock Storage Area

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 114 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

5.2.2.2 PRE-DISTURBANCE, EXISTING, AND FINAL SITE CONDITIONS

The pre-disturbance site conditions are summarized in Section 3.

Figure 5.5, Figure 5.6 and Figure 5.7 show the 2019 waste rock deposition plan from February through December. In addition, Appendix C provides a photolog showing the current mining operations.

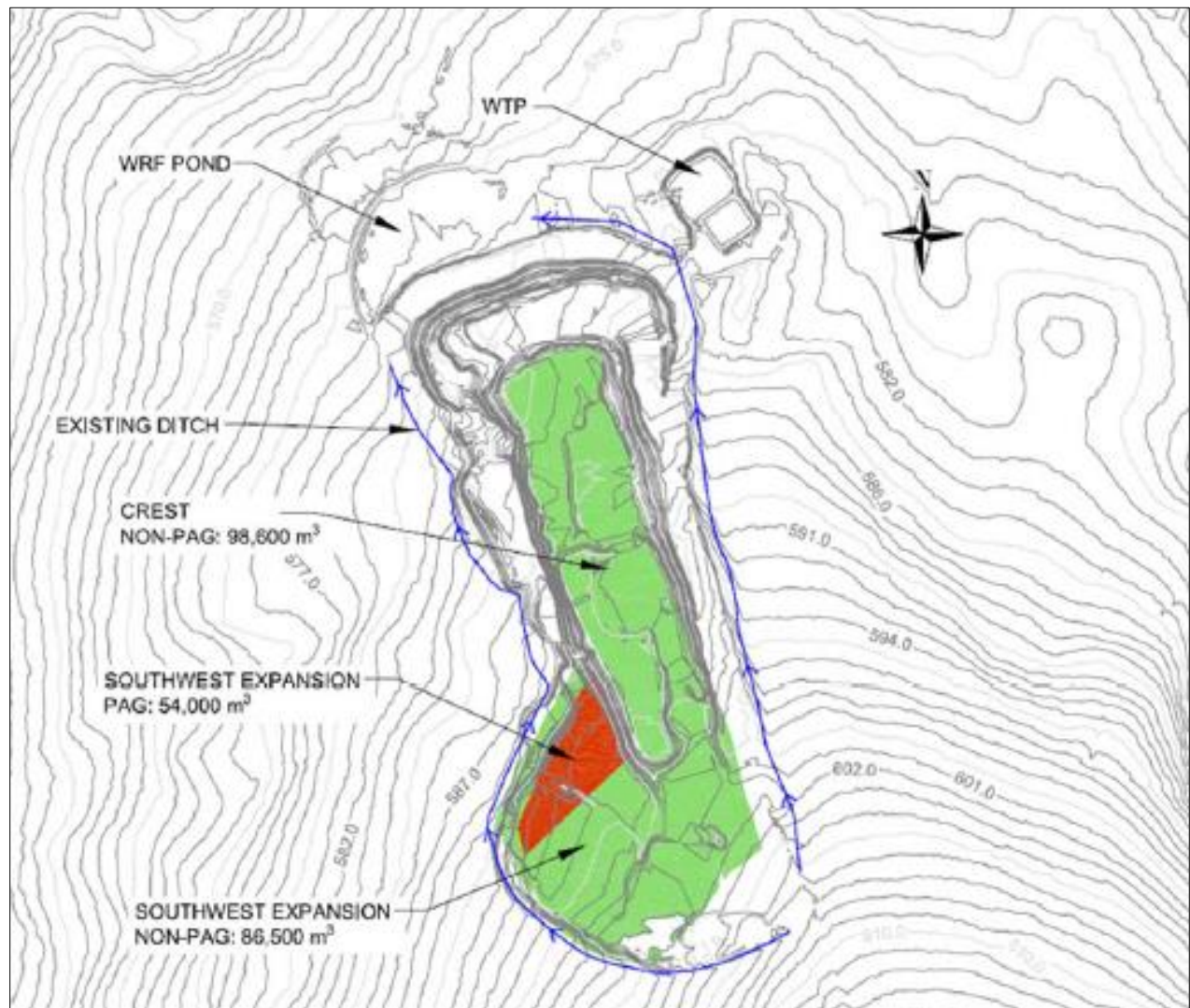


Figure 5.5 Waste Rock Placement – February 2019 through May 2019

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 115 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

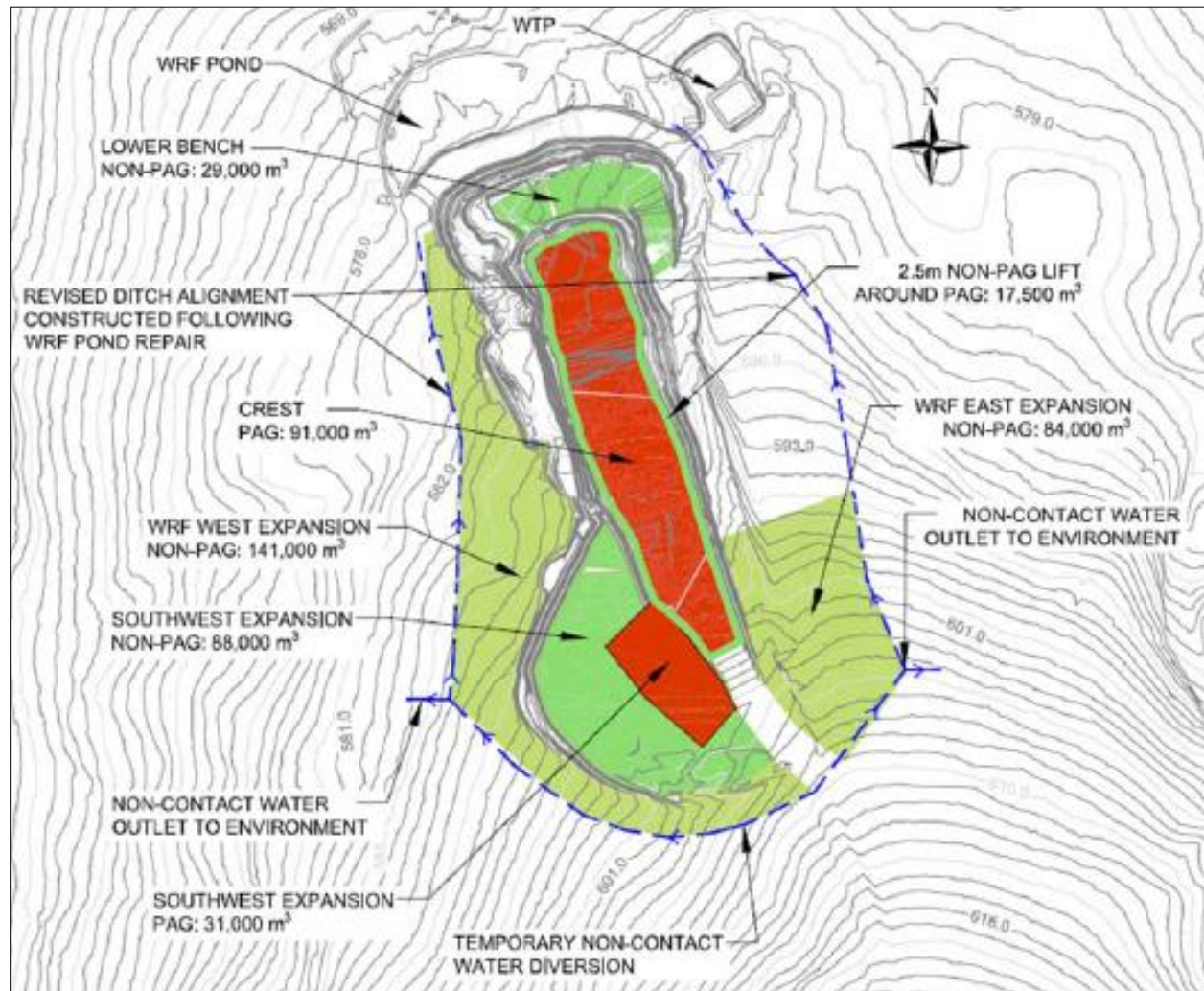


Figure 5.6 Waste Rock Placement – June 2019 through October 2019

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 116 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

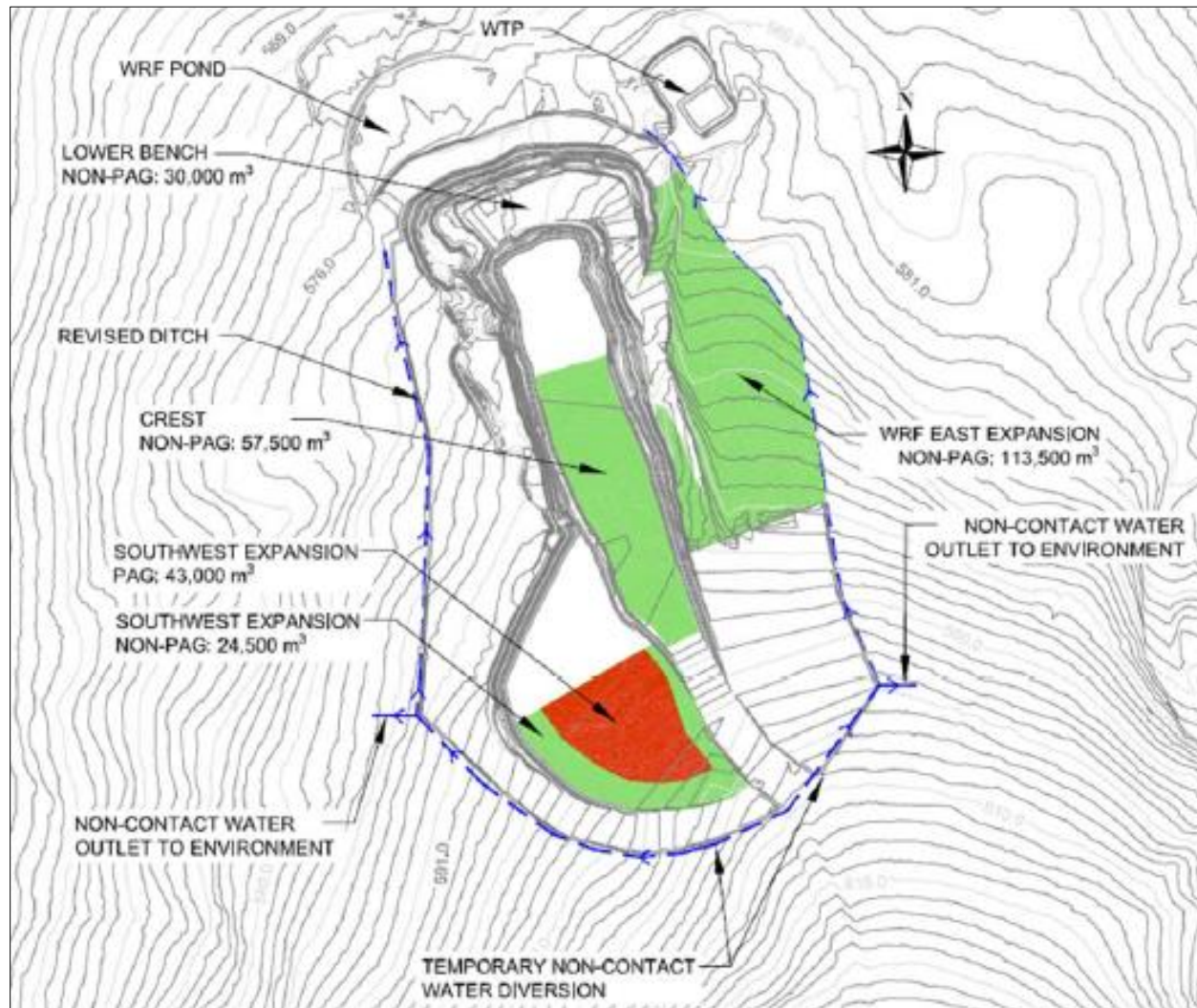


Figure 5.7 Waste Rock Placement – November 2019 through December 2019.

The pH measurements in the effluent dropped below the mine effluent MDMER and Type A Water Licence discharge limits in 2017, possibly due to the unexpected onset of weakly acidic conditions in the WRF. Batch treatment in the pond using sodium carbonate was undertaken in August 2017, and an Interim Waste Rock Management Plan was prepared. A treatment program was also initiated in 2017. As a requirement of the Type A Licence MRY 2AA-1325, ongoing plans for addressing acid runoff from the Waste Rock stockpile were submitted and approved by the NWB in 2018.

A further revised Waste Rock Management Plan is under preparation to address waste rock management over the next five years based on recent waste rock geochemistry and WRF pond monitoring results (Phase 2 Proposal, TSD-13). No changes to waste rock management are required to undertake the Phase 2

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 117 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Proposal, and existing predictions for waste rock seepage and runoff quality post closure are considered achievable via the planned reclamation measures (i.e. rock cover overlying PAG materials, establishment of permafrost in waste).

At closure, the Waste Rock Stockpile will remain on site. It will contain approximately 630 Mt of waste rock and overburden, with average side slopes of 2H: 1V. As the surrounding terrain is rugged and rocky with minimal vegetation, no active revegetation or contouring is anticipated to be required to enhance its similarity to the surrounding terrain.

5.2.2.3 CLOSURE OBJECTIVES AND CRITERIA

The closure objectives are presented in Section 5.1.1 and closure criteria are presented in Table 5.1.

5.2.2.4 CONSIDERATION OF CLOSURE OPTIONS AND SELECTION OF CLOSURE ACTIVITIES

Detailed alternative analysis of other closure options have not been completed by Baffinland due to the early stage of the Project and the absence of Project components which represent the largest uncertainty at closure (Open Pit, Permanent Waste Rock Stockpile). As data are collected and analysis is conducted, the ICRP will be updated as required. Please refer to Appendix D for more detail on reclamation research plans relevant to the Project to address uncertainties related to final closure.

Relevant closure options at the Waste Rock Stockpile will likely be limited to minor changes in PAG/non-PAG material placement occurring as part of the ongoing management of waste materials within the required set backs as outlined within approved management plans.

5.2.2.5 ENGINEERING WORK ASSOCIATED WITH CLOSURE ACTIVITY

The main work items for closing the Waste Rock and Overburden Stockpiles are as follows:

- Cleanup of any soil contamination (i.e. hydrocarbons, etc.) – see Section 9.6, if applicable;
- Monitoring and confirming the freezing (permafrost aggradation) of the pile, with the exception for a shallow “active” zone;
- Monitoring the water quality of any seepage emanating from the waste rock stockpile;
- Conducting an engineering stability analysis ((Section 9.2) to confirm the long-term stability of the slopes of the waste rock pile, and recontouring (if necessary) to ensure the slopes are physically stable;
- Grading at associated water management structures (e.g. two Waste Rock Stockpile Ponds, potential temporary dams) to establish final drainage pathways;
- Accumulated sediments at the Waste Rock Stockpile management ponds will be assessed for leaching and potential impacts to downgradient water quality. Options for managing potential risk from sediments include but are not limited to: covering, excavation, disposal at approved facility.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 118 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Mine planning will ensure that at closure the exterior of the dump consists of a layer of non-PAG material up to 50 m thick. To minimize active layer thickness, a stockpile of overburden will be retained to spread a layer of less permeable material over the top of the dump.

Studies of waste rock in permafrost demonstrate that permafrost forms an effective long-term barrier to water and oxygen, thereby preventing significant oxidation of sulphidic waste rock located below the surficial active zone. The surficial “active” zone, which will be subject to seasonal freeze-thaw, will not reach the 50 m thickness of non-PAG material in the long-term (within 200 years) under the influence of climate change (Intergovernmental Panel on Climate Change, 2007). Therefore, over the long term, runoff water quality which is influenced by contact water that flows through the active layer in the waste rock stockpile will not be affected. Following closure, generation of ML/ARD is not anticipated.

The physical stability of the waste rock stockpile will be investigated at the onset of closure. This investigation will take into account the final geometry of the stockpile, including the aerial extent, height, cross-sections and the volume in place. If geotechnical investigations indicate it necessary, the waste rock stockpile may undergo re-contouring to ensure physical stability. Following re-contouring and stabilization investigations and activities, as required, the waste rock stockpiles will be considered closed.

Based on the current state of the Mine Site prior to mining activities, the Mine Site is characterized by a rugged rocky terrain with minimal vegetation. Therefore, an uncovered waste rock stockpile is considered environmentally compatible with the current undisturbed surrounding areas.

Runoff from the Waste Rock Stockpile will continue to be monitored until runoff meets water quality objectives for closure (described in Section 9.5). Once water quality objectives have been met, the Waste Rock Stockpile ponds will be decommissioned, and runoff will be allowed to discharge directly to the environment.

5.2.2.6 PREDICTED RESIDUAL EFFECTS

The predicted residual effects at planned closure, including those encompassing the waste rock pile, were assessed as part of the FEIS with respect to VECs/VSECs. A detailed breakdown of these effects, and the methods for their assessment are summarized in Appendix G. Key FEIS residual effects predictions regarding surface water discharges from the WRF post closure are that any substantive impacts will be localized (see below) and adverse environmental effects on water quality or Arctic Char at the Mine Site LSA are not expected post-closure.

As reported in the Interim Waste Rock Stockpile Seepage Quality model (Appendix 4, BAF-PH1830-P16-0031), predictions indicate that the concentrations of arsenic, copper, lead, nickel, and zinc concentrations in the waste rock stockpile seepage will be below MDMER values. However, there is uncertainty in this model as follows:

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 119 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

- The water quality model is based on the mine plan, waste rock stockpile configuration, water balance and geochemical data. Changes to these assumptions may result in differing water quality;
- A number of assumptions made to develop the model (permafrost extent, stockpile hydrology, acid drainage source terms, etc.) that should be updated where more appropriate data becomes available;
- The current model has considered the surface area based on a review of published and unpublished data from other mine projects which could be different from the actual surface area of the Project waste rock; and
- Current model estimates are based upon simplified estimates of the seepage pH. These pH values can have a significant impact on the estimated loadings and concentrations of metals predicted in the model.

Details on thresholds and modelled water quality of the specific waters that will receive stormwater from the waste rock stockpile via the east and west ponds are provided in Appendix H. The West Waste Rock Stormwater will discharge to Camp Lake via its tributaries, with increasing dilution and mixing along the way. Conservative modelling of the anticipated water quality of the west pond discharge and the predicted water quality in the receiving waters identified potential exceedances of water quality thresholds (CCME PAL) of mercury and selenium in Camp Lake and tributary L1 and L0 under mean flow and dry year conditions (HQ of 1 and 2, respectively in Camp Lake, higher in the tributaries; see Tables 9 and 10 in Appendix H). HQ (Hazard Quotient) is the ratio of the potential exposure to a substance and the level at which no adverse effects are expected. If the Hazard Quotient is calculated to be less than 1, then no adverse effects are expected as a result of exposure. The same conservative modelling approach completed for the east pond discharge to Mary River (containing fish habitat) identified potential exceedances of water quality thresholds (CCME PAL) of mercury, selenium, and silver under both mean flow and dry flow year conditions (HQ of 4, 1, and 1, respectively). The reason these results are considered highly conservative is explained in Appendix H. The residual effects are considered partially reversible because reversibility may require ongoing water treatment, and the duration of any required treatment is unknown at this time. The QIA has inquired if there will be changes in water quality that may affect the ability to safely consume fish from waterbodies near the Waste Rock Stockpile and Open Pit. The risk associated with consuming arctic char in the Project area is difficult to assess, as baseline sampling results reported in the FEIS found that 29% of arctic char exceeded Health Canada guidelines for mercury (this is not an unusual finding for land-locked char). Nevertheless, as the project progresses, data will be collected through the environmental monitoring programs which can provide an indication of the accuracy of the existing predicted effects. These data can also be used to give an indication of the performance of the site mitigation measures and management systems, and as the basis for revising the prediction of residual effects, or implementing adaptive management.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 120 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

5.2.2.7 UNCERTAINTIES

Baffinland will conduct monitoring and research as necessary to resolve uncertainties (described above) pertaining to residual effect assessments and environmental risks that may have closure implications.

The primary uncertainties related to the waste rock and overburden pile are:

- whether or not there is potential for the generation of ML/ARD from contact water at the end of life; and
- the rate at which the waste rock pile will aggrade of permafrost and the thickness of the active layer (layer that will be unfrozen during the warmer months of the year).

The mining plan and the ongoing waste rock characterization plan will inform the prediction modeling of the Life-of-Mine Waste Rock Management Plan (Appendix 4, BAF-PH1830-P16-0031).

Reclamation research programs (Appendix D) have been designed to improve understanding of the expected performance of the waste rock pile closure concept with respect to both drainage water quality as well as with respect to permafrost aggradation through operation and closure.

5.2.2.8 POST CLOSURE MONITORING, MAINTENANCE AND REPORTING

Post-closure monitoring of waste rock and overburden piles includes geotechnical/engineering monitoring (Section 9.4), aquatic monitoring (Section 9.5), Environmental Site Assessment (Section 9.6), fauna and flora monitoring (Section 9.7), safety compliance inspection (Section 9.9), and air quality monitoring (Section 9.11). Maintenance required will depend on the outcome of the monitoring programs, and would be completed as outlined in Table 5.1 Baffinland will report on the results of all monitoring programs on an annual basis to the NIRB (as per Project Certificate No. 005 and its Amendment), AANDC Land Lease 47H/16-1-2, the NWB (as per Type 'A' Water Licence 2AM-MYR-1325 Amendment No. 1) and the Land Owners (as per Commercial Lease Q13C301).

5.2.2.9 CONTINGENCIES

5.2.2.9.1 WASTE ROCK STOCKPILE RUNOFF WATER QUALITY

In the event that research, ongoing water quality modelling, or field monitoring shows a trend toward exceedance of discharge requirements, then water treatment options will be determined and implemented.

Details regarding theoretical treatment options are provided in the Life-of-Mine Waste Rock Management Plan (Section, 3.6.4, BAF-PH1830-P16-0031) and were considered for both metal and ammonia/nitrate removal. Theoretical treatment options for metals removal included:

- Resins
- Polymer Addition

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 121 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

- Sodium Hydrosulfite Treatment
- Ozonation
- Biofilters-Sulphide Precipitation
- Activated Carbon
- Lime Precipitation

Theoretical treatment options for ammonia/nitrate removal include:

- Biological De-nitrification (for removal of both ammonia and nitrate)
- Ion Exchange
- Electro-Chemical Ion Exchange
- Breakpoint Chlorination of Ammonia

Regular updates on waste rock characterization and prediction of runoff water quality will be provided in future updates of the Life-of-Mine Waste Rock Management Plan (BAF-PH1-830-P16-0031) as they are developed and will be incorporated into future versions of the ICRP as appropriate.

5.2.3 QUARRIES AND ORE/AGGREGATE STOCKPILES

5.2.3.1 PROJECT COMPONENT DESCRIPTION

This project component includes:

- Mine Site:
 - Quarry D1Q1
 - Quarry D1Q2
 - Quarry QMR2
 - KM 97 Borrow Locations
 - Ore Stockpile
 - ROM Stockpile
- Tote Road:
 - Extended cuts in bedrock along road corridor
- North Railway
 - Extended cuts in bedrock along rail embankment
 - Multiple quarries proposed (up to 30)
 - Temporary ore transfer area (including 12,000 t stockpile)

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 122 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

- Milne Port:
 - MP-Q1-01
 - MP-Q1-02
 - Borrow Source No. 1
 - Quarry No. 1
 - Ore Stockpiles

The Run of Mine (ROM) stockpile is a small stockpile which is used to temporarily store mined ore prior to feeding it to the primary crusher. Ore is then either crushed to a fine ore product, or left as lump ore. The ore (fine and lump) is moved to the mine site Ore Stockpile used to temporarily store ore that is ready to haul to Milne Port. As part of Phase 2, secondary crushing of ore is to move to Milne Port, housed in a building. At Milne Port, the crushed ore is stored in a large stockpile until such time that it can be loaded onto a ship. Ore may be stored at the Milne Port ore stockpile for several months over the winter until open water conditions permit shipping.

5.2.3.2 PRE-DISTURBANCE, EXISTING, AND FINAL SITE CONDITIONS

The pre-disturbance site conditions are summarized in Section 3. Appendix C provides a photolog showing the current mining operations.

Each existing quarry permit application presents a quarry development plan, drainage information as well as a closure plan. All borrow areas and quarries will be progressively reclaimed maintaining stable side slopes in accordance with the individual site permit. At the onset of closure the borrow areas and quarries will be investigated to assess for potential thermal damage and instability due to thaw impacts. At closure, re-contouring and filling with overburden may be required to ensure slope stability and restore the natural drainage due to thermal disruptions. Quarries associated with the Phase 2 Proposal will be managed and reclaimed consistent with existing sites.

The ore/aggregate stockpiles will be depleted upon closure. Soils below the stockpiles will be sent for testing and treatment, if required, as discussed in Section 9.4. The ore/aggregate stockpile bases will be re-contoured as necessary, scarified, and allowed to naturally re-vegetate. If ore/aggregate stockpiles remain at closure, they will be graded and re-contoured for long-term physical stability. There are currently no plans to place a cover material over residual ore for aesthetic purposes unless aesthetic values identified through community engagement on mine closure determine the need for fill placement. Construction of a clean fill cover, and/or placement of residual ore as backfill will be assessed if water quality concerns are present.

5.2.3.3 CLOSURE OBJECTIVES AND CRITERIA

The closure objectives are presented in Section 5.1.1 and closure criteria are presented in Table 5.1

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 123 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

5.2.3.4 CONSIDERATION OF CLOSURE OPTIONS AND SELECTION OF CLOSURE ACTIVITIES

Detailed alternative analysis of other closure options have not been completed by Baffinland due to the early stage of the Project and the absence of Project components which represent the largest uncertainty at closure (Open Pit, Permanent Waste Rock Stockpile). As data are collected and analysis is conducted, the ICRP will be updated as required. Please refer to Appendix D for more detail on reclamation research plans relevant to the Project to address uncertainties related to final closure.

Relevant closure options to consider in the future will likely include grading and drainage options assessed as part of the Final Grading Plan.

5.2.3.5 ENGINEERING WORK ASSOCIATED WITH CLOSURE ACTIVITY

Quarries and borrow pits will no longer be needed at closure. Closure of active quarry faces will involve removing all materials, equipment and infrastructure. Active quarry walls will be terraced during operation to closely manage issues related to drainage and will not be altered for closure. The quarry development will reduce the creation of pits and depressions to the degree practicable to reduce the potential for standing water. The quarry pit floor will be left as free draining.

All site waste will be collected and placed in appropriate containers for removal. Pre and post waste removal inspections will be made to ensure the thoroughness of the program. Waste will include metallic waste, construction material waste and domestic waste.

At the current time, no washroom facilities for personnel are expected at the quarry site. Any requirement for such facilities will be met by easily removable portable toilets. These will be operated in a manner consistent with regulations, and disposal will be in accordance with Baffinland's Waste Management Plan (BAF-PH1-830-P16-0028).

Quarrying activities will be closely managed to avoid the accumulation of unnecessary stockpiles of aggregate. Any stockpiles that do remain will be dealt with as follows:

- Large rock will be spread out on the landscape or used as rip-rap for erosion control
- Medium sized rock will be used to re-contour affected areas to re-establish a more natural appearance to the area
- Small crushed rock will be used to assist in drainage restoration, and spread on the landscape to re-establish more natural contours
- Any collected soils will be spread to allow for the re-establishment of vegetation. No vegetation planting or seeding operations will take be undertaken and natural re-vegetation will be allowed to take place

Quarry access roads will typically be relatively short aggregate structures. The entire road bed will be removed to re-establish desired drainage.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 124 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

A pre-closure inspection for potentially impacted soils will be completed at the entire site. Any contaminated soils, snow or ice packs, or overburden will be flagged. The extent of the contamination will be assessed, and the material removed for treatment at a site-landfarm or containerized for shipment to a licenced off-site facility.

Other contamination, such as heavy metals or toxins, will require containerization for shipment off site to an appropriate facility (refer to Interim Closure and Reclamation Plan).

Reclamation of uncovered permafrost and ground/ice will involve removing any ponding water and backfilling the impacted permafrost and/or ground ice with available material.

At the end of mining, ore and aggregate stockpiles will have all been used up. The former stockpile areas will be recontoured to match the surrounding terrain (where possible), and scarified to promote natural revegetation and allow vegetation to re-establish through natural processes. The secondary crusher and surrounding building at Milne Port will be decommissioned and demobilized from site consistent with other buildings and equipment (Section 5.2.4).

5.2.3.6 PREDICTED RESIDUAL EFFECTS

The predicted residual effects at planned closure, including those encompassing quarries and ore/aggregate stockpiles, were assessed as part of the FEIS and Phase 2 Proposal with respect to VEC/VSEC. These effects, and the methods for their assessment are summarized in Appendix G.

Of the thirty-six (36) planned quarries to be used to construct the North Railway and other Phase 2 Proposal infrastructure, twenty-four (24) are located in sedimentary rocks (limestone or sandstone), both of which have a high buffering capacity, and present no Acid Rock Drainage (ARD) risk (Hatch, 2018; AMEC, 2010). The remaining nine (9) quarries are located in granitic gneiss or diorite, both of which have a low sulphide content, making them unlikely candidates for producing ARD (AMEC, 2010). However, these rock types also have a low neutralization potential, which means that they could produce ARD if the neutralizing materials within them are insufficiently reactive, or depleted at a faster rate than the sulphides. Overall, the ARD potential of the granitic rocks has been assessed to be low (AMEC, 2010; Hatch, 2017).

As the project progresses, data will be collected through the environmental monitoring programs which can provide an indication of the accuracy of the predicted effects. These data can also be used to give an indication of the performance of the site mitigative measures and management systems, used as the basis for revising the prediction of residual effects, or implementing adaptive management.

5.2.3.7 UNCERTAINTIES

Uncertainties related to the closure of quarries include whether or not the remaining exposed aggregate is PAG, which is addressed in the individual quarry management plans. Ore/aggregate stockpiles have the potential to result in contaminated soils and will be assessed at closure (Section 9.6). There is uncertainty

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 125 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

in what level of revegetation success at these areas can be expected, and this topic is addressed in a reclamation research program (Appendix D).

5.2.3.8 POST CLOSURE MONITORING, MAINTENANCE AND REPORTING

Post-closure monitoring of quarries and ore/aggregate stockpiles includes geotechnical/engineering monitoring (Section 9.4), aquatic monitoring (Section 9.5), Environmental Site Assessment (Section 9.6), fauna and flora monitoring (Section 9.7), safety compliance inspection (Section 9.9), and air quality monitoring (Section 9.11). Maintenance required will depend on the outcome of the monitoring programs, and would be completed as outlined in Table 5.1. Baffinland will report on the results of all monitoring programs on an annual basis to the NIRB (as per Project Certificate No. 005 and its Amendment), AANDC Land Lease 47H/16-1-2, the NWB (as per Type 'A' Water Licence 2AM-MYR-1325 Amendment No. 1) and the Land Owners (as per Commercial Lease Q13C301).

5.2.3.9 CONTINGENCIES

Ongoing monitoring at quarries and rock cuts throughout the mine's operation will identify the need to update reclamation plans and assess contingencies. Geochemical evaluations to date suggest that the potential for ARD/ML is low, and quarrying operations to date have not resulted in significant effects to water quality (Phase 2 Proposal, TSD 13).

Contingencies related to the revegetation efforts have not been completed by Baffinland due to the early stage of the Project and the absence of Project components which represent the largest uncertainty at closure (Open Pit, Permanent Waste Rock Stockpile). As data are collected and analysis is conducted, the ICRP will be updated as required.

5.2.4 BUILDINGS AND EQUIPMENT

5.2.4.1 PROJECT COMPONENT DESCRIPTION

To the extent possible, buildings have been consolidated to hold accommodation, administration, maintenance and laboratory complexes to reduce outside travel of in-building workers. The accommodation buildings consist of a prefabricated modular unit supported on timber cribbing foundations, and house personnel in single dormitory wings. A central core area comprises: kitchen/dining facilities, recreational facilities, and general service space. The fire protection system includes a primary fire pump (with backups) and sprinkler systems for the accommodation, administration, laboratory, and warehouse facilities. See Section 5.2.5 for mining infrastructure, including associated buildings.

Haul trucks equipped with side dump trailers dump directly on the ground. Front end loaders are used to transport the dumped ore to portable feeders, which transfer the ore to telescopic portable radial stackers, which in turn deposit the ore in the stockpiles. There are sets of portable feeders and portable radial stackers, each with a capacity of 1,500 tph. The feeders and stackers are powered by an onboard diesel generator.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 126 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

5.2.4.2 PRE-DISTURBANCE, EXISTING, AND FINAL SITE CONDITIONS

The pre-disturbance site conditions are summarized in Section 3. Appendix C provides a photolog showing the current mining operations.

Upon Final Mine Closure, buildings and infrastructure will be decommissioned and no longer be features on site. Associated pads and laydown areas will be re-graded to restore natural drainage patterns where possible, and scarified to allow for natural re-vegetation at closure.

5.2.4.3 CLOSURE OBJECTIVES AND CRITERIA

The closure objectives are presented in Section 5.1.1 and closure criteria are presented in Table 5.1.

5.2.4.4 CONSIDERATION OF CLOSURE OPTIONS AND SELECTION OF CLOSURE ACTIVITIES

Detailed alternative analysis of other closure options have not been completed by Baffinland due to the early stage of the Project and the absence of Project components which represent the largest uncertainty at closure (Open Pit, Permanent Waste Rock Stockpile). As data are collected and analysis is conducted, the ICRP will be updated as required. Please refer to Appendix D for more detail on reclamation research plans relevant to the Project to address uncertainties related to final closure.

5.2.4.5 ENGINEERING WORK ASSOCIATED WITH CLOSURE ACTIVITY

To permit the reclamation of the land area they cover, improve aesthetics, remove the physical hazard they pose to humans and the environment, and address any chemical concerns they may pose, buildings at the Mine Site, Tote Road, and Milne Port will be removed.

Mechanical equipment will be considered closed and reclaimed when they no longer pose a risk of contamination to the environment, will not be a safety hazard to humans and wildlife, and no longer need long-term care.

Removal of the buildings and equipment will involve the following works:

- Decontaminate buildings and equipment as necessary to permit safe working conditions and mitigate the potential for uncontrolled releases;
- Demolish buildings and haul away the refuse;
- The foundations of buildings and equipment (and infrastructure) will be demolished:
 - Concrete foundations will be demolished to grade and exposed rebar will be cut to grade to prevent safety hazards;
 - Concrete foundation areas will be drilled to allow for water infiltration; and
 - Any remaining concrete piles will be cut to grade and covered with overburden,

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 127 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

- Relocate all equipment to the mainland for resale, dispose of on-site as refuse, or donate to the local community;
- Cleanup of any soil contamination (i.e. hydrocarbons, etc.) – see Section 9.6;
- Re-grade the area to restore the natural drainage patterns; and
- Scarify the ground surface around the buildings to support natural revegetation.

Refuse from the demolished buildings and Milne Port will be removed and either:

- Transported to Milne Port for shipment to the mainland for either disposal or salvage
- Disposed of in the open pit (including concrete and rebar)
- Disposed of in the onsite landfills or other approved repository

5.2.4.6 PREDICTED RESIDUAL EFFECTS

The predicted residual effects at planned closure, including those encompassing buildings and equipment, were assessed as part of the FEIS with respect to VEC/VSEC. These effects, and the methods for their assessment are summarized in Appendix G.

As the project progresses, data will be collected through the environmental monitoring programs which can provide an indication of the accuracy of the predicted effects. These data can also be used to give an indication of the performance of the site mitigative measures and management systems, used as the basis for revising the prediction of residual effects, or implementing adaptive management.

5.2.4.7 UNCERTAINTIES

Uncertainties related to buildings and equipment are limited to whether or not any such facilities will be left in place, and whether or not any associated contaminated soils may be present upon closure ((Section 9.5). There may be uncertainty in revegetation success, addressed in a reclamation research program (Appendix D).

5.2.4.8 POST CLOSURE MONITORING, MAINTENANCE AND REPORTING

Post-closure monitoring of buildings and equipment includes geotechnical/engineering monitoring (Section 9.4), aquatic monitoring (Section 9.5), Environmental Site Assessment (Section 9.6), fauna and flora monitoring (Section 9.7), safety compliance inspection (Section 9.9), and air quality monitoring (Section 9.11). Maintenance required will depend on the outcome of the monitoring programs, and would be completed as outlined in Table 5.1. Baffinland will report on the results of all monitoring programs on an annual basis to the NIRB (as per Project Certificate No. 005 and its Amendment), AANDC Land Lease 47H/16-1-2, the NWB (as per Type 'A' Water Licence 2AM-MYR-1325 Amendment No. 1) and the Land Owners (as per Commercial Lease Q13C301).

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 128 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

5.2.4.9 CONTINGENCIES

The need for contingencies for the reclamation of buildings and equipment has not been identified by Baffinland at this time. As the project progresses, the need for adaptive management and contingency alternatives may arise due to the outcomes of discussions with the MCWG.

5.2.5 MINING INFRASTRUCTURE

5.2.5.1 PROJECT COMPONENT DESCRIPTION

Mining Infrastructure comprises the following main elements:

- Mine Site
 - Camp Pads
 - Laydowns
 - Air Strip
 - Site Roads
 - Water crossings
 - Conduit berms
 - Utilidor/corridor
 - Crushing plant (primary jaw crusher and secondary cone crusher and primary and secondary screens)
- Milne Port
 - Camp Pads
 - Laydowns
 - Site Roads
 - Water crossings
 - Conduit berms
 - Crushing building
 - Conveyors
- Tote Road
 - Laydown Areas
- North Railway
 - Temporary Ore Transfer Area
 - Laydown Areas

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 129 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Two mobile, self-contained crushing units are used for primary and secondary ore crushing and screening at the Mine Site. The Phase 2 Proposal includes transferring secondary ore crushing equipment to Milne Port within an enclosed building. This is expected to reduce dust generation at the Mine Site. This equipment does not require concrete foundations or structural steel feed bins, except that a sacrificial ore pad was prepared as a base for the ore stockpiling. The mobile crushing/screening units are designed to operate year-round. The crusher trains are equipped with one jaw crusher, one cone crusher, one primary screen and one secondary screen. After crushing and screening, the product is reclaimed and loaded into tractor/trailer units for haulage to Milne Port.

Two products are produced, lump and fines, with fines being material smaller than 6.3 mm. Initial bulk tests indicated that a ratio of 3:1 lump to fines was expected on average. Ore is crushed and screened following delivery to the primary crusher and subsequently transported to customers without further processing.

The crushing and screening assembly is located approximately 2.5 km south of the open-pit mine and connected by a 7 km road. The lump product (< 31.5 mm/>6.3 mm) and fines product (<6.3 mm) discharge onto the lump collection conveyor and fines collection conveyor, respectively, for transfer to the local stockpiling area.

During the shipping season, ore from the lump ore stockpile will be reclaimed using the travelling (rail-mounted) stacker/reclaimer which will load the ore onto the stacking/reclaim conveyor. Reclaimed ore will then be transferred onto a shiploader feed conveyor for transport to the shiploader. Weigh scales and product samplers will be installed on the conveyors to facilitate inventory recording and quality control sampling.

Ore from the fines stockpile will be loaded onto the shiploader as is currently undertaken.

The shiploader is the conveyance system used to fill the holds of vessels with the ore, and has a capacity of 6,000 t/h. This shiploader will continue to be used to fill Panamax and Supermax size vessels at the existing ore dock. A second shiploader will be constructed to fill vessels berthing at the new capesize dock with ore from the lump ore stockpile. A bucket wheel reclaimer will be used to reclaim ore from the stockpile and feed the shiploader. The second shiploader will be a dual linear luffing shiploader with a capacity of 16,000 t/h. This type of shiploader has the advantage of full luffing capability, which reduces drop heights and therefore reduces product degradation and dust emissions.

Until railway infrastructure is commissioned, the iron ore haul trucks will continue to dump coarse ore on a stockpile adjacent to the crusher building. This ore will be reclaimed by front end loaders and fed to the crushing plant. Long-haul trucks dump ore (either lump or fines) into small stockpiles, and mobile radial stackers are used to transfer the ore into the appropriate (lump or fines) stockpile.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 130 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Ore arriving to Milne Port by truck from the Mine Site has already been crushed and screened into lump ore and fine ore products, as follows:

- Lump ore - 31.5 mm to 6.3 mm in size; and
- Fine ore - less than 6.3 mm in size

The Phase 2 Proposal includes the following changes to how ore is crushed and stockpiled at Milne Port:

- Secondary ore crushing and screening operations will be located at Milne Port (previously located at the Mine Site);
- The crushing and screening plants will be located indoors (the crushing and screening plant at the Mine is currently outdoors);
- Rail will deliver ore;
- Product stockpile sizes will increase in accordance with the increased quantity of ore being loaded onto ships; and
- Fine ore will be loaded into vessels at the existing ore dock only; lump ore will be loaded into vessels berthing at the new capesize ore dock.

The crushing and screening plants will consist of large cone crushers fed from large vibrating screens, which will produce the lump and fine ore products to the same specifications as the crushing and screening operation at the Mine Site.

Placement of the crushers and screens indoors will substantially reduce dust emissions and lower noise levels. Dust collectors will be installed at ore screening and crusher transfer points. A transfer conveyor will deliver lump and fine ore from the crushing and screening plant to a stacker/reclaimer at the lump ore stockpile, and to the mobile radial stackers at the stockpile.

New catchment areas or ponds will be built as required to contain runoff from the expanded stockpile (Section 5.2.8).

Where possible, permanent support infrastructure was built at the onset of construction, and used during both the construction and operation phases of the Project. Temporary infrastructure constructed or positioned at Project sites needed only for the construction phase are removed once construction is complete. In line with this strategy, most of the infrastructure developed at the onset of construction activities remains in service for the Life of the Project.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 131 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

5.2.5.2 PRE-DISTURBANCE, EXISTING, AND FINAL SITE CONDITIONS

The pre-disturbance site conditions are summarized in Section 3. Appendix C provides a photolog showing the current mining operations.

Relative to pre-development conditions at Milne Port, the remnants of infrastructure including buildings will be removed and laydown areas re-graded to restore natural drainage patterns where possible, and scarified to allow for natural re-vegetation at closure. Milne Port ore dock will remain in place to provide ongoing fish habitat. The water crossings along the Milne Inlet Tote Road will be removed.

The causeway and docks at Milne Port will be left in place. Dock infrastructure at Milne Port will be removed and either recycled, shipped offsite to an appropriate facility for disposal, or deposited within onsite landfill, the open pit or other approved repositories.

The lighting associated with the airstrips will be removed. The airstrips will be re-graded and reclaimed unless otherwise directed by regulatory agencies or the Land Owner to provide emergency/rescue landing spots for regional aircraft, when no other options are available.

The Mine Site utilidor/corridor will be dismantled and disposed of in either the Mine Site landfill or transported offsite to the mainland via sealift for disposal at an approved facility.

The airstrips at the Mine Site and Milne Port will be removed unless otherwise directed by regulatory agencies, Land Owner, or the MCWG to remain in place and left in operating condition. Abandoned airstrips may provide emergency landing locations for regional aircraft or helicopters, when other options are unavailable.

5.2.5.3 CLOSURE OBJECTIVES AND CRITERIA

The closure objectives are presented in Section 5.1.1 and closure criteria are presented in Tabel 5.1

5.2.5.4 CONSIDERATION OF CLOSURE OPTIONS AND SELECTION OF CLOSURE ACTIVITIES

Detailed alternative analysis of other closure options have not been completed by Baffinland due to the early stage of the Project and the absence of Project components which represent the largest uncertainty at closure (Open Pit, Permanent Waste Rock Stockpile).

Baffinland has committed to the establishment of a “Mine Closure Working Group” (MCWG) in order to best incorporate considerations for post-closure land use of the Project site. The role of the MCWG will be to facilitate the integration of community representation and technical expertise by drawing on Inuit knowledge, arctic experience for similar mining operations, and discussion of alternative uses for decommissioned facilities into the reclamation options for various Project components. Several infrastructure components may be of use to the local communities, including the Milne Port ore dock, airstrips at Milne Port, the Mine Site, and at Steensby Port.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 132 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

5.2.5.5 ENGINEERING WORK ASSOCIATED WITH CLOSURE ACTIVITY

To permit the reclamation of the land area they cover, improve aesthetics, remove the physical hazard they pose to humans and the environment, and address any chemical concerns they may pose, mine infrastructure at the Mine Site, Tote Road, and Milne Port will be removed.

Removal of mine infrastructure will involve the following works:

- Decontaminate buildings and equipment as necessary to permit safe working conditions and mitigate the potential for uncontrolled releases;
- Salvage infrastructure that could be sold (crushers, etc.) on or donated to the local community;
- Demolish structures (ex: mine site utilidor/corridor) and haul away the refuse;
- Demolish foundations of infrastructure:
 - Concrete foundations will be demolished to grade and exposed rebar will be cut to grade to prevent safety hazards;
 - Concrete foundation areas will be drilled to allow for water infiltration; and
 - Any remaining concrete piles will be cut to grade and covered with overburden,
- Remove culverts and bridges that form water crossings for mine site and Milne Port site roads;
- Relocate crushers and screening plants to the mainland for resale, for disposal on-site, or donate to the local community;
- Cleanup of any soil contamination (i.e. hydrocarbons, etc.) – see Section 9.6;
- Re-grade the area to restore the natural drainage patterns; and
- Scarify the ground surface around the buildings to support natural revegetation.

Refuse from the mine infrastructure will be removed and either:

- Transported to Milne Port for shipment to the mainland for either disposal or salvage
- Disposed of in the open pit (including concrete and rebar)
- Disposed of in the onsite landfills or other approved repository

5.2.5.6 PREDICTED RESIDUAL EFFECTS

The predicted residual effects at planned closure, including those encompassing mining infrastructure, were assessed as part of the FEIS with respect to VEC/VSEC. These effects, and the methods for their assessment are summarized in Appendix G.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 133 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

As the project progresses, data will be collected through the environmental monitoring programs which can provide an indication of the accuracy of the predicted effects. These data can also be used to give an indication of the performance of the site mitigative measures and management systems, used as the basis for revising the prediction of residual effects, or implementing adaptive management.

5.2.5.7 UNCERTAINTIES

Uncertainties related to mining infrastructure are limited to whether or not any such facilities will be left in place, and whether or not any associated contaminated soils may be present upon closure ((Section 9.5). There may also be uncertainty in revegetation success, addressed in a reclamation research program (Appendix D).

5.2.5.8 POST CLOSURE MONITORING, MAINTENANCE AND REPORTING

Post-closure monitoring of mining infrastructure includes geotechnical/engineering monitoring (Section 9.4), aquatic monitoring (Section 9.5), Environmental Site Assessment (Section 9.6), fauna and flora monitoring (Section 9.7), safety compliance inspection (Section 9.9), and air quality monitoring (Section 9.11). Maintenance required will depend on the outcome of the monitoring programs, and would be completed as outlined in Table 5.1 Baffinland will report on the results of all monitoring programs on an annual basis to the NIRB (as per Project Certificate No. 005 and its Amendment), AANDC Land Lease 47H/16-1-2, the NWB (as per Type 'A' Water Licence 2AM-MYR-1325 Amendment No. 1) and the Land Owners (as per Commercial Lease Q13C301).

5.2.5.9 CONTINGENCIES

The need for contingencies for the reclamation of mine infrastructure has not been identified by Baffinland at this time. As the project progresses, the need for adaptive management and contingency alternatives may arise due to the outcomes of discussions with the MCWG.

5.2.6 TRANSPORTATION ROUTES

5.2.6.1 PROJECT COMPONENT DESCRIPTION

Transportation routes on site include the Mine Haul Road, Tote Road and the Ore/Freight Docks at Milne Port. A southern rail route to Steensby Port has been approved, but a specific timeline to begin construction on this aspect of the project has not been developed. Phase 2 includes the construction and operation of the North Railway to Milne Port, and a second ore dock at Milne Port.

The total estimated length of the Mine Haul Road is approximately 10 km from the open-pit to the primary crusher and the waste dump areas and was constructed based on the following design criteria:

- Width three times the width of haul trucks (20 m)
- Design speed: 50 km/h
- Maximum gradient: 10 %

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 134 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

- Runaway lanes as required

The Mine Haul Road was constructed with a minimum granular fill thickness of 1.5 m. The road structure consists of 300 mm surface course of Granular A, overlying a 300 mm layer of base fill, overlying a 900 mm layer of sub-base rock fill.

The Tote Road, a gravel all-season road, is approximately 98.5 km. Kilometer marking “0” begins at the ore stockpile located approximately 2.5 km from the Milne Port ore dock. The Tote Road ends at kilometer marking “98.5” at the Mine Site ore crushing and loading pad. A fleet of highway trucks is used for ore hauling along the Tote Road and consist of a 600 HP tri-drive tractor and two identical side-tipping trailers with a combined payload of approximately 150 t. The trucks and trailers assembly are custom designed for Arctic conditions.

The four (4) single lane modular bridge crossings constructed as part of the Tote Road upgrade program were constructed to replace the pre-existing side-by-side sea-can style bridge crossings. These bridges are designed to suit the mobile equipment and trucks used on the Tote Road during construction and operations. The bridges are located at chainages km 17, km 62, km 80 and km 97 along the Tote Road between Milne Port and the Mary River Mine Site. These bridges are single lane sized to meet the Nunavut *Mine Health and Safety Act* requirements for the design vehicles’ widths. The bridge span was designed to meet the water’s design volume and flow rate. The deck height was designed to meet the requirements of the *Navigable Waters Protection Act* (NWPA) by Transport Canada.

Additional dust suppression water sources along the Northern Transportation Corridor are proposed as part of the the Phase 2 Proposal. Baffinland proposes to increase the volumes at three already approved sources, and thirteen new water sources have been identified. An assessment of the new and revised water sources is presented in TSD 13 of the Phase 2 Proposal. All water intakes will be equipped with fish screens in accordance to DFO’s fish screen guideline (DFO,1995).

The North Railway will be 110 km in length from the loading station at the Mine Site to the unloading station at Milne Port. For most of the length, the railway embankment will be constructed adjacent to the Tote Road. However, due to various constraints (e.g., topography), an approximately 20 km section of the railway will deviate from the Tote Road alignment, between KP 57 and KP 84.5, located on IOL land. The railway design is similar to that of the South Railway proposed in the FEIS, and further information is available in Section 4.1.2.2 of the Phase 2 Proposal.

There is one ore dock currently operating at Milne Port, capable of berthing panamax ore carriers. A second ore dock capable of berthing capesize ore carriers is proposed as part of Phase 2. The orientation of the second dock is optimized to allow a clear approach for vessels parallel to the berth face and clearing the existing dock. The dock construction methodology is described in TSD 02 (Section 4.2 and Appendix F) of the Phase 2 Proposal. The freight dock was authorized under Project Certificate No. 005 Amendment 2, and is planned for construction in 2019.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 135 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

5.2.6.2 PRE-DISTURBANCE, EXISTING, AND FINAL SITE CONDITIONS

The pre-disturbance site conditions are summarized in Section 3. Appendix C provides a photolog showing the current mining operations.

Bridges, culverts and other water crossings along the Milne Inlet Tote Road will remain in place until all the closure activities requiring Milne Port access at the Mine site are completed. This road is part of the Inuit-Owned Lands referenced in the Nunavut Land Claims Agreement. It is designated for public use and communication to communities has indicated the road will be left in good physical condition in accordance with Project requirements, with water crossings removed. The final decision on the removal of the water crossings will remain with the Land Owner although the removal cost of the bridge spans has been included for closure planning. Bridge abutments will be left in place where needed to maintain long-term stability of the section of the road abutting the watercourse; however, this strategy will be reviewed at each location based on the performance of the structure throughout the Project life cycle. For example, bridge abutments at the Mary River crossing are within the river and will need to be removed to restore the stream bed and banks as described below. Ongoing engagement with communities and discussions with QIA will occur to confirm an approach for the Tote Road and water crossings such that an acceptable level of liability exists for transfer of these remaining structures. Similarly, the Milne Port ore and freight docks will remain in place to provide ongoing fish habitat and will potentially be utilized for local community use following closure.

5.2.6.3 CLOSURE OBJECTIVES AND CRITERIA

The closure objectives are presented in Section 5.1.1 and closure criteria are presented in Table 5.1.

5.2.6.4 CONSIDERATION OF CLOSURE OPTIONS AND SELECTION OF CLOSURE ACTIVITIES

Detailed alternative analysis of other closure options have not been completed by Baffinland due to the early stage of the Project and the absence of Project components which represent the largest uncertainty at closure (Open Pit, Permanent Waste Rock Stockpile).

Baffinland has committed to the establishment of a “Mine Closure Working Group” (MCWG) in order to best incorporate considerations for post-closure land use of the Project site. The role of the MCWG will be to facilitate the integration of community representation and technical expertise by drawing on Inuit knowledge, arctic experience for similar mining operations, and discussion of alternative uses for decommissioned facilities into the reclamation options for various Project components. Several infrastructure components may be of use to the local communities, including the Tote Road and water crossings, Milne Port ore dock, airstrips at Milne Port, the Mine Site, and at Steensby Port.

Future closure options assessment for the bridge abutments at water crossings will consist of evaluating which structures will remain, and which will be removed/graded, based on long-term stability considerations. Additional discussion on the approach for assessing structures prior to final closure, and focus areas for post-closure monitoring are presented in Section 9.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 136 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

5.2.6.5 ENGINEERING WORK ASSOCIATED WITH CLOSURE ACTIVITY

To permit the reclamation of the land area they cover, improve aesthetics, remove the physical hazard they pose to humans and the environment, and address any chemical concerns they may pose, mine infrastructure at the Mine Site, Tote Road, North Railway and Milne Port will be removed.

Closure of transportation infrastructure will involve the following works:

- Water crossings, including bridges, along the Tote Road and North Railway may be left in place at the land owner's request. Ongoing engagement with communities and discussions with QIA will occur to confirm an approach for the water crossings such that an acceptable level of liability exists for transfer of these remaining structures.
- The Ore and Freightdocks at Milne port will remain in place with all surface infrastructure removed. The ore docks may potentially be used by communities, subject to approval by the land owner (CIRNAC).
- Remove road/rail embankment fill from within the high water limits of the water body. Water crossing may remain in place based on discussions with the land owner at the time of final closure, however the assumption is that they will need to be removed. A typical water crossing restoration is provided in Figure 5-8.
- Relocate excavated material from the water crossing location and place in areas located more than 30 metres from any water body. This material could be used at nearby grading in borrow areas and quarries.
- Streambeds and banks will be restored and stabilized. This will require communication with DFO prior to commencing work.
- Removed culverts will be flattened and disposed of in on-site landfills or demobilized. Ditching will be subject to grading as necessary to establish post-closure drainage pathways.
- Abandoned sections of the Tote Road are expected to be transferred 'as is'. If any additional closure activities are desired by the parties receiving responsibility for the structures, this will be confirmed via ongoing engagement with the applicable communities and QIA.
- Environmental site assessments at road and/or railroad maintenance and fueling facilities where impacts are expected.
- Cleanup of any soil contamination (i.e. hydrocarbons, etc.) – see Section 9.6
- Geochemical sampling of ballast materials to understand potential ML/ARD concerns.
- Removal of ore spillage into the ballast from movement of trains.
- Ballast cleaning and disposal of recovered fines.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 137 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

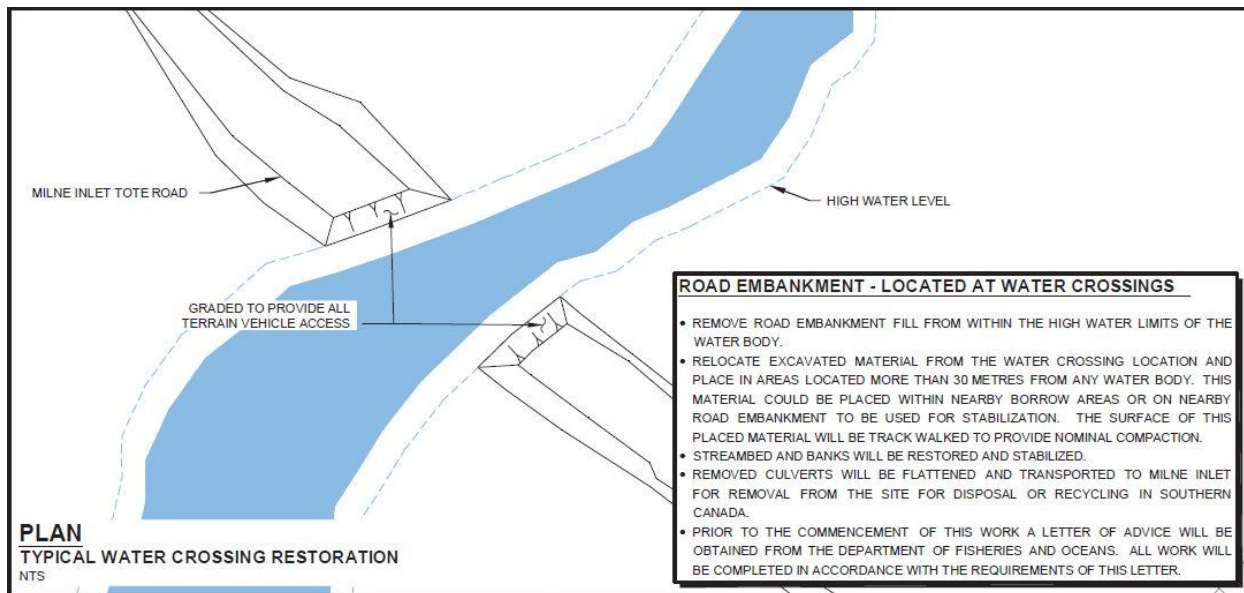


Figure 5.8 Typical Water Crossing Restoration along Tote Road.

5.2.6.6 TIE REPLACEMENT AND DISPOSAL OF USED TIES. PREDICTED RESIDUAL EFFECTS

The predicted residual effects at planned closure, including those encompassing transportation routes, were assessed as part of the FEIS with respect to VECs/VSECs. These effects, and the methods for their assessment are summarized in Appendix G.

As the project progresses, data will be collected through the environmental monitoring programs which can provide an indication of the accuracy of the predicted effects. These data can also be used to give an indication of the performance of the site mitigative measures and management systems, used as the basis for revising the prediction of residual effects, or implementing adaptive management.

5.2.6.7 UNCERTAINTIES

Uncertainties related to the transportation routes may include which infrastructure may be left in place and whether or not any associated contaminated soils may be present upon closure (Section 9.6). There may also be uncertainty in revegetation success, addressed in a reclamation research program (Appendix D).

5.2.6.8 POST CLOSURE MONITORING, MAINTENANCE AND REPORTING

Post-closure monitoring of transportation routes includes geotechnical/engineering monitoring (Section 9.4), aquatic monitoring (Section 9.5), Environmental Site Assessment (Section 9.6), fauna and flora monitoring (Section 9.7), safety compliance inspection (Section 9.9), and air quality monitoring (Section 9.11). Maintenance required will depend on the outcome of the monitoring programs, and would be

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 138 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

completed as outlined in Table 5.1. Baffinland will report on the results of all monitoring programs on an annual basis to the NIRB (as per Project Certificate No. 005 and its Amendment), AANDC Land Lease 47H/16-1-2, the NWB (as per Type 'A' Water Licence 2AM-MYR-1325 Amendment No. 1) and the Land Owners (as per Commercial Lease Q13C301).

5.2.6.9 CONTINGENCIES

The need for contingencies for the reclamation of mine infrastructure has not been identified by Baffinland at this time. As the project progresses, the need for adaptive management and contingency alternatives may arise due to the outcomes of discussions with the MCWG.

5.2.7 WASTE, LANDFILLS AND OTHER DISPOSAL AREAS

5.2.7.1 PROJECT COMPONENT DESCRIPTION

This mine closure component includes:

- Milne Port
 - Landfarm
 - Landfill
 - Contaminated snow containment area
 - Non-hazardous waste disposal locations
- Mine Site
 - Landfill
 - Non-Hazardous Waste Disposal Locations
- Milne Port and Mine Site disposal of fuel and hazardous materials, including:
 - Fuel Tank Farm and Fuel Dispensing Facilities (Arctic Diesel, Jet-A Fuel)
 - Hazardous Material Storage Areas
 - Waste Management Facilities Including Temporary Storage Areas
 - Hazardous Waste and Hazardous Chemicals
 - Fuel
 - Explosives Storage

LANDFARM AND CONTAMINATED SNOW CONTAINMENT AREA

The Milne Port landfarm package includes the landfarm containment area and the contaminated snow containment area constructed south of the accommodation camp, near the Milne Inlet Quarry (Q1). The landfarm containment area was constructed to store/remediate the petroleum hydrocarbon (PHC) contaminated sand/gravel materials removed from the old bulk fuel bladder farm during decommissioning, and for storage of contaminated soils during continuing mining operations. This remediation occurs through volatilization and natural biological processes. The contaminated snow

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 139 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

containment area was constructed as a storage location for contaminated snow removed from the tank farm's berm containment areas and subsequent snow contaminated during mine operations. The landfarm containment area grade slopes towards the sump in the southwest corner to facilitate draining of the soil material.

The design basis for the landfarm containment area water capacity is 3,383 m³ with 0.3 m of design freeboard. The design basis for the contaminated snow containment area water capacity storage is 929 m³ with 0.3 m of design freeboard.

The landfarm and contaminated snow containment has been constructed as primarily rectangular in shape to optimize the earthworks materials (granular fills and liner installation). The berms have side slopes not steeper than 2H:1V and a 1.0 m wide horizontal liner length for appropriate liner anchoring in the outer berm. Access to the landfarm package is from the old Tote Road just north of the Q1 quarry site to the south side. The access road contains a 500 mm diameter culvert crossing over a seasonal drainage that is not fish habitat.

The landfarm package was constructed using raised earthworks. All earth fill materials used during construction were compacted during above-freezing summer temperatures to achieve the design compaction required. Both the soil containment and the snow containment compartments were sealed with HDPE liner material for storage of the runoff/seepage, and covered with a layer of fill material. Trucks deposit contaminated soils and snow inside each compartment by driving inside the appropriate area and dumping into the surface gravels as called for in the design.

FUELS AND TANK FARM

The Milne Port Tank Farm and dispensing infrastructure includes the marine pipeline (connecting the marine manifold building to the arctic diesel system), the arctic diesel system, the Jet-A1 system, the fuel dispensing systems, the secondary containment earth dyke with synthetic liner, and all interconnecting piping. The package was designed for marine loading/offloading, tank truck loading/offloading, vehicle fueling, and genset fuel feed at the port facility. The tank farm includes:

- Three (3) 12 ML arctic diesel field-fabricated tanks with tag numbers 2613-TK-004, 2613-TK-005, and 2613-TK-006, and two (2) 5 ML arctic diesel field-fabricated tank with tag number 2613-TK-001 and 2613-TK-002
- Three (3) 0.75 ML Jet-A1 fuel pre-fabricated tanks with tag numbers 2614-TK-007, 2614-TK-008, and 2614-TK-009

These tanks are all vertical single wall steel construction, designed to API 650, located within an earth dyke with synthetic liner. The secondary containment dyke is designed to the requirements of the National Fire Code of Canada. The tank farm includes space for two extra tank pads for future expansion of one additional 0.75ML Jet-A1 tank (2614-TK-010) and one additional 15 ML arctic diesel tank (2613-TK-

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 140 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

003), proposed as part of Phase 2. The tanks are equipped with spiral access stairways and guardrails at the roof of each tank.

The Milne Port tank farm is refuelled annually by ocean going tanker. A floating hose is deployed from the ship and connected to the onshore manifold. An aboveground steel marine pipeline transfers the fuel from the shore manifold to the tank farm. The ship floater manifold connection is equipped with a gate valve and check valve assembly to enable ship-to-shore connection and to prevent backflow. All connections are contained within a spill containment assembly with a hinged and lockable cover.

The fuel dispensing system includes two (2) prefabricated fuel dispensing modules: the Arctic Diesel Fuel Module, and the JetA1 Fuel Module. The existing Arctic Diesel Fuel Module is located to the west side of the tank farm. The new modules are insulated and heated 40 ft ISO shipping containers, complete with piping, fuel transfer equipment, temperature corrected delivery systems, electrical and control components, and code compliant fire suppression systems. Access to the fuelling equipment is through lockable equipment doors and side rollup door.

The Milne Port tank farm was constructed as a rectangular shape to optimize the earthworks materials (granular fills and liner). The tank farm is surrounded by dykes with side slopes not steeper than 2H:1V and the berm top width is 600 mm. The secondary containment area includes ten (10) tank foundation pads, ramp loading areas, dyke access roads and dyke walls, and dyke access stairs on the east side behind the fuelling module. Inside the primary dyke containment area, there is a 1% slope towards the sump.

There are two (2) access ramps into the dyke containment area to allow emergency vehicle and maintenance vehicle access. One ramp is on the south side, into the existing/modified dyke area. The second ramp is on the east side, leading from the fueling area down into the new dyke area. The containment area around the tank farm and dispensing package has been constructed with raised earthworks and synthetic welded liner for the containment of spills. Additionally, the facility is designed for containment of rainwater and snowmelt that can potentially be contaminated by contact with fuel originating from leakage or spills. Contact water is removed and treated if required before it is discharged to the receiving environment. A mobile oil-water separator (OWS) water treatment system is used to treat storm water runoff, overfills, or spills from within the secondary containment area in order to meet the water licence discharge criteria. The liner is buried 450 mm below the floor of the dyke.

The facility was designed and constructed to the following codes and standards:

- Tank construction will adopt the API 650 12th Edition, 2013, Welded Steel tanks for Oil Storage
- Tank inspection, repair, alteration and reconstruction will use API 653 4th Edition, 2009; including Addendums 1 and 2
- National Building Code of Canada 2010

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 141 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

- National Fire Code of Canada 2010
- NFPA 30, 2012 Edition, Flammable and Combustible Liquids Code
- CCME Environmental Code of Practice for Aboveground Storage Tank Systems containing Petroleum Products, 2003
- ANSI B31.3-2012, Process Piping
- CSA W47.1-09, Certification of Companies for Fusion Welding of Steel
- CSA W59-03 (R2008) – Welded Steel Construction (Metal Arc Welding)
- *Canadian Environmental Protection Act* 1999 (2008 Update)
- Storage Tank System for Petroleum Products and Allied Petroleum Products Regulations
- CSA W178.2-08, Certification of Welding Inspectors

Fuel is delivered to the mine site via bulk fuel truck loaded from the project's Milne Port facility. The Mine Site Tank Farm and dispensing infrastructure includes a tank farm facility within a secondary containment earth dyke with synthetic liner, fuel dispensing system, and all interconnecting piping. The package was designed for tank truck loading/offloading, vehicle fueling, and genset fuel feed at the Mine Site camp facility.

The Mine Site tank farm includes four (4) arctic diesel pre-fabricated storage tanks with tag numbers 4613-TK-001, 4613-TK-002, 4613-TK-003, and 4613-TK-004. These tanks are 0.5 ML each, vertical single wall steel construction, designed to API Standard 650. The secondary containment dyke is designed to the requirements of the National Fire Code of Canada. The tanks are equipped with spiral access stairways and guardrails at the roof of each tank.

The fuel dispensing system includes one (1) prefabricated fuel dispensing module: the Arctic Diesel Fuel Module. This module is an insulated and heated 40 ft ISO shipping container, complete with piping, fuel transfer equipment, temperature corrected delivery system, electrical and control components, and code compliant fire suppression system. The diesel dispensing module is located on the plant-south side of the tank farm. Access to the fueling equipment is through lockable equipment doors and side rollup door. The refueling area consists of a ramp up to and down from the fuel modules with a vehicle containment area surrounding the fuel module to ensure appropriate management of potential spills during fueling operations. The lined refueling area drains into the secondary containment dyke.

The Mine Site tank farm was constructed as rectangular shaped to optimize the earthworks materials (granular fills and liner). The tank farm is surrounded by dykes with side slopes not steeper than 2H:1V and a berm top width of 600 mm. The secondary containment area includes four (4) tank foundation pads, ramp loading areas, dyke access roads and dyke walls, and dyke access stairs on the south side behind the fueling module. The containment area around the tank farm and dispensing package was constructed with

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 142 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

raised earthworks and synthetic welded liner for the containment of spills. Additionally, the facility is designed for containment of rainwater and snowmelt that can potentially be contaminated by contact with fuel originating from leakage or spills. Contact water is removed and treated if required before it is discharged to the receiving environment. The liner is buried 450 mm below the floor of the dyke.

The Approved Project includes an additional 15 ML of Arctic diesel storage at the Mine site, and the Phase 2 Proposal would increase that by an additional 30 ML.

SOLID WASTE MANAGEMENT INFRASTRUCTURE

Solid waste management infrastructure includes the incinerators, waste management buildings, and the hazardous waste containment areas. The incinerator is used to dispose of applicable non-hazardous waste. The waste management building provides a heated indoor area for waste to be appropriately sorted to meet the incinerator's burning 'recipe' requirements. The hazardous waste containment areas are lined containment cells used to store hazardous waste/contaminated material in support the Project's site drainage monitoring strategy. The incinerator equipment is modular and operates within three sea containers attached to the rear of the waste management buildings. Residual ash from the incinerators are sent to the project's landfill for disposal.

Each of the three sea containers housing the incinerator equipment has an access port that penetrates the rear wall of the foldaway building. The waste management buildings are rectangular in shape with truck door access on one side.

The hazardous waste containment areas have been constructed rectangular in shape to optimize the earthworks materials (granular fills and liner installation). The berms have side slopes not steeper than 1.5H:1V and a 1.0 m wide horizontal liner length for appropriate liner anchoring in the outer berm. The containment area has a 4% grade access ramp on the west side and a drainage pond on the east side.

The waste management building pad and the hazardous waste containment areas have all been constructed using raised earthworks. The pre-cast concrete block foundation arrangement in the waste management building and poured concrete floor with sumps in each half of the building serves as effluent containment. The hazardous waste containment areas have been sealed with liner material for storage of the runoff/seepage or spills, and been covered with a layer of fill material.

LANDFILLS

The Project's landfill at the Mine site has been designed in accordance with the "Guidelines for the Planning, Design, Operations and Maintenance of Modified Solid Waste Sites in the Northwest Territories" (Ferguson, Simek Clark Engineers & Architects, 2003). Only non-hazardous, non-organic and inert waste is disposed of in the facility. All liquid industrial waste and hazardous waste is diverted for proper hazardous waste disposal to a licensed facility off site.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 143 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

The area method is used for waste disposal wherein a low height berm will be constructed along two sides of the landfill site and then waste will be disposed of against the berms and directly onto the ground downstream of the berms. Sand and gravel will be used as the cover material. In order to achieve permafrost encapsulation in the landfill site, the final cover will be thicker than the active layer. No fencing will be required as the inert waste should not attract wildlife, and public access to the area is restricted. Because of permafrost in the area, no groundwater protection system is included. In addition, landfill gas is not expected to be an issue as the deposited waste will be non-hazardous and inert. Therefore, a landfill gas collection system was not installed in the landfill site.

The Milne Port landfill will be constructed inside the boundaries of the exhausted Quarry Q1 following construction. The area method will be used for waste disposal wherein a low height berm will be constructed along up to two sides of the landfill site (or using a quarry face) and then waste will be disposed of against the berms and directly onto the ground downstream of the berms. Sand and gravel will be used as the cover material. To achieve permafrost encapsulation in the landfill site, the final cover will be thicker than the active layer. Appropriate surface water, erosion and sediment control measures will be implemented during operations. The landfill is not expected to significantly change the quality of surface waters in the area due to the inert nature of the waste and small landfill footprint.

EXPLOSIVES FACILITY

The explosives facility package includes the explosives plant building (i.e., the emulsion plant) and the explosives shop (storage for raw materials). These facilities were designed for modular installation in arctic conditions. In support of the overall Mary River project development the use of explosives is required to produce construction aggregate and to facilitate mining activities. The facility's purpose is to manufacture and store the explosives and materials required to facilitate this objective and to minimize potential environmental impacts, specifically for water quality and wildlife during the period where blasting operations are conducted. The design premise for these facilities is based on achieving a zero-effluent process. Contaminated waste water generated from the manufacturing operations are collected and re-used in the process, including truck wash water. The explosives facility and the operational policies in place meet or exceed the applicable regulations as part of the following acts:

- *Canada Explosives Act*
- *Transport of Dangerous Goods Act*
- Occupational Health & Safety, Nunavut – *Explosives Use Act*
- Northwest Territories/Nunavut *Mine Health and Safety Act* and Regulations

All infrastructure and manufacturing processes are licensed and approved by Natural Resources Canada (NRCan) – Explosives Regulatory Division. Magazine storage sites are licensed by the Nunavut Workers Safety and Compensation Commission (WSCC).

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 144 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

The explosives facility is located south of the Mine Site stockpile. The access road intersects the treated effluent pond access road mid-way between the stockpile and the treated effluent's approved discharge point. The explosives facility is located more than 65 m away from the facility's storage containers, more than 350 m from the explosives magazine, and more than 970 m from the ore crushing and screening pad. The facility pad was constructed of raised earthworks complete with drainage culverts and access ramps.

5.2.7.2 PRE-DISTURBANCE, EXISTING, AND FINAL SITE CONDITIONS

The pre-disturbance site conditions are summarized in Section 3. Appendix C provides a photolog showing the current mining operations.

The landfarm and contaminated snow containment area located at Milne Port provides onsite treatment of contaminated soils. Once no longer required, the landfarm and contaminated snow containment area will be closed to physically and geotechnically stabilize for the long term, make surface runoff and seepage water quality safe for humans and wildlife, and to encourage the desired wildlife movement. Post-closure water quality run-off objectives in receiving water bodies from landfarms will be met and no long-term active care is expected to be required.

The fuels and tank farm at Milne Port and Mine Site, assuming they are not to be maintained, will be decommissioned and removed during closure. Soils will be tested for contamination. The area will be regraded to restore natural drainage patterns where possible, and scarified to allow for natural re-vegetation.

Solid waste management infrastructure includes the incinerators, waste management buildings, and the hazardous waste containment areas. The incinerators and waste management buildings will be decommissioned and removed from the site and affected footprint regraded to restore natural drainage patterns where possible and scarified to allow for natural re-vegetation. The hazardous waste containment areas will be evaluated for any remaining hazardous material/soils and addressed as per the Hazardous Materials and Hazardous Waste Management Plan. The area will be re-graded and scarified to allow for natural re-vegetation at closure.

The Mine Site Landfill Facility is operated to house only non-hazardous material. Project landfills will be progressively covered with overburden, as cells are completed, to allow the contents of the landfill to remain permanently frozen to physically and geotechnically stabilize in the long term, make surface runoff and seepage water quality safe for humans and wildlife, and encourage the desired wildlife movement upon site abandonment, such that post-closure water quality run-off objectives in receiving water bodies are met and no long-term active care is required.

The explosives facility will be removed from the site. The associated footprint will be re-graded to restore natural drainage patterns where possible, and scarified to allow for natural re-vegetation at closure.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 145 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

A list of non-salvageable materials has been developed and will be provided annually as part of the Annual Security Review process conducted in accordance with Schedule C of Type “A” water licence 2AM-MRY1325.

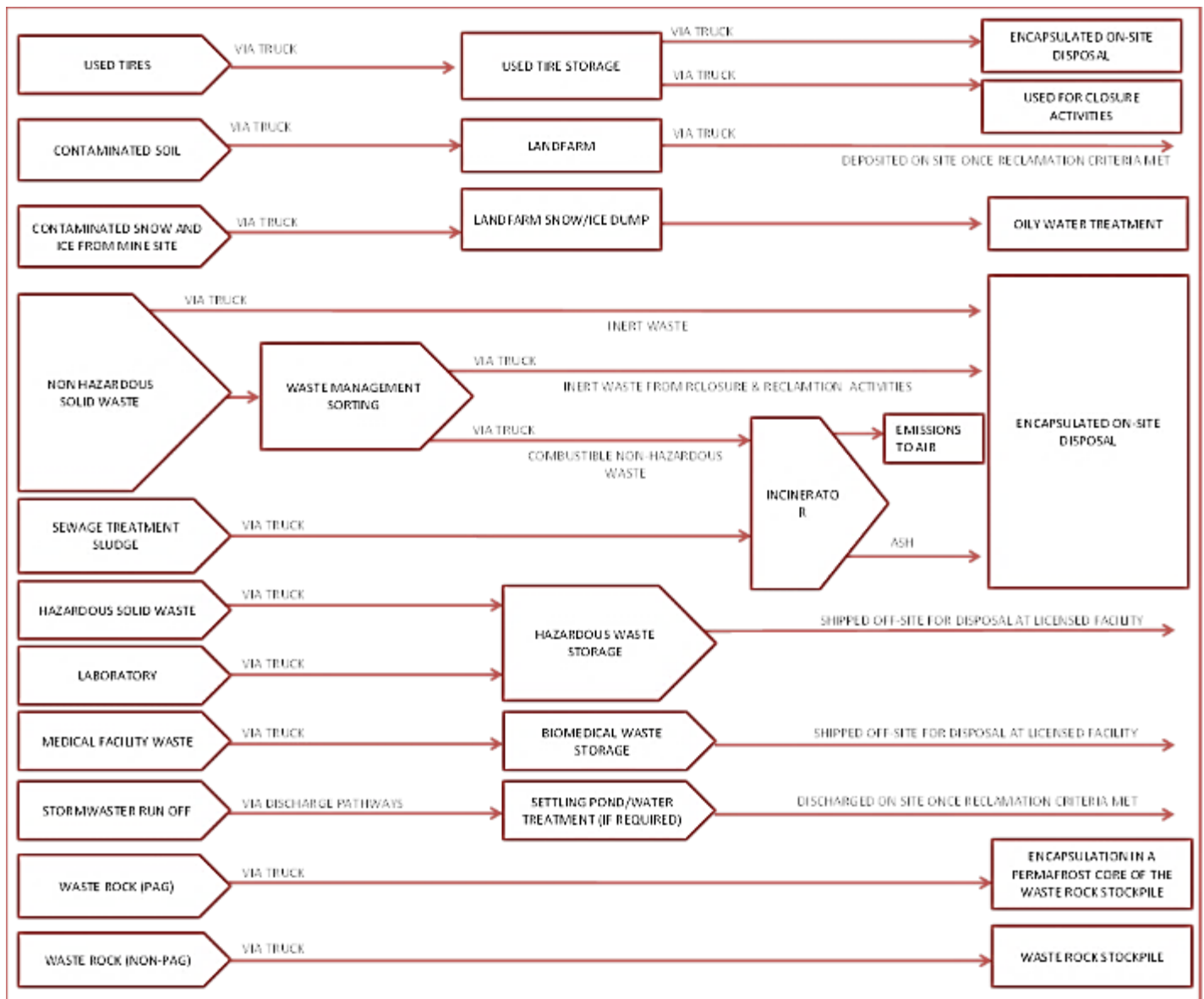


Figure 5.9 Major Waste Streams and Methods of Transportation

5.2.7.3 CLOSURE OBJECTIVES AND CRITERIA

The closure objectives are presented in Section 5.1.1 and closure criteria are presented in Table 5.1.

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 146 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

5.2.7.4 CONSIDERATION OF CLOSURE OPTIONS AND SELECTION OF CLOSURE ACTIVITIES

Detailed alternative analysis of other closure options have not been completed by Baffinland due to the early stage of the Project and the absence of Project components which represent the largest uncertainty at closure (Open Pit, Permanent Waste Rock Stockpile). As data are collected and analysis is conducted, the ICRP will be updated as required. Please refer to Appendix D for more detail on reclamation research plans relevant to the Project to address uncertainties related to final closure.

No major closure options are being considered for this mine component. The closure activities discussed below is expected to be relevant for all existing and any future changes to project infrastructure within this mine component (e.g. additional non-hazardous landfills).

5.2.7.5 ENGINEERING WORK ASSOCIATED WITH CLOSURE ACTIVITY

At final closure, Baffinland will undertake a comprehensive site Phase 1 Environmental Site Assessment (ESA) to determine extent of contaminated areas and appropriate techniques and methods to deal with such sites.

The onsite landfill located at the Mine Site will be reclaimed by capping the landfill with 1.5 m of overburden or equivalent material to freeze the core of the landfill. The landfill sites will be scarified to encourage natural re-vegetation.

At the end of Project life, Baffinland will consider transferring the facilities to a third party, should a third party express such an interest. The rationale for the approach is to eliminate sources of contamination on-site to the extent reasonably possible. Figure 5.9 demonstrates the major waste streams expected to be generated during closure and reclamation activities and the respective expected transportation and disposal approach.

The stock of explosives will be depleted towards the end of the operations phase and any remaining explosives will be securely contained and shipped from the site by a licensed contractor to an approved facility for disposal or reuse or detonated in a controlled and safe fashion by experienced and licensed personnel at appropriate locations away from sensitive receptors.

Oil, grease, ammonium nitrate and chemicals will be transported offsite for disposal at an approved facility or where applicable for reuse. All batteries and hazardous waste will be removed and disposed of or recycled at an approved facility offsite.

Combustible non-hazardous wastes will be incinerated at the Project incinerators. Once the incinerators are no longer required, they will be disposed of in one of the site non-hazardous landfills, or shipped to the mainland to be disposed of off-site.

Liners will be removed from polishing ponds and Polishing Waste Stabilization Ponds (PWSPs), and berms will be re-graded and levelled.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 147 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

A list of non-salvageable materials has been developed and will be provided annually as part of the Annual Security Review process conducted in accordance with Schedule C of Type “A” water licence 2AM-MRY1325.

5.2.7.6 PREDICTED RESIDUAL EFFECTS

The predicted residual effects at planned closure, including those encompassing landfills and other disposal areas, were assessed as part of the FEIS with respect to VEC/VSEC. These effects, and the methods for their assessment are summarized in Appendix G. Following closure, no residual effects related to landfills and other disposal areas are anticipated with the required mitigation (e.g. reclamation/remediation, as required), with the exception of vegetation. Loss of vegetation within the PDA is a residual effect — it is not expected that disturbed areas will become re-vegetated until after closure of the mine. Regeneration of the disturbed area is a slow process and will not occur until beyond the life of the project.

As the project progresses, data will be collected through the environmental monitoring programs which can provide an indication of the accuracy of the predicted effects. These data can also be used to give an indication of the performance of the site mitigative measures and management systems, used as the basis for revising the prediction of residual effects, or implementing adaptive management.

5.2.7.7 UNCERTAINTIES

Uncertainties related to the closure of landfills and other waste disposal areas is whether or not the remaining land contains contaminated soils (Section 9.6), and there may be uncertainty in revegetation success, addressed in a reclamation research program (Appendix D).

5.2.7.8 POST CLOSURE MONITORING, MAINTENANCE AND REPORTING

Post-closure monitoring of landfills and other waste disposal areas includes geotechnical/engineering monitoring (Section 9.4), aquatic monitoring (Section 9.5), Environmental Site Assessment (Section 9.6), fauna and flora monitoring (Section 9.7), safety compliance inspection (Section 9.9), and air quality monitoring (Section 9.11). Maintenance required will depend on the outcome of the monitoring programs, and would be completed as outlined in Table 5.1. Baffinland will report on the results of all monitoring programs on an annual basis to the NIRB (as per Project Certificate No. 005 and its Amendment), AANDC Land Lease 47H/16-1-2, the NWB (as per Type ‘A’ Water Licence 2AM-MYR-1325 Amendment No. 1) and the Land Owners (as per Commercial Lease Q13C301).

5.2.7.9 CONTINGENCIES

The need for contingencies for the reclamation of waste, landfills, and other disposal areas has not been identified by Baffinland at this time. As the project progresses, the need for adaptive management and contingency alternatives may arise due to the outcomes of discussions with the MCWG.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 148 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

5.2.8 WATER MANAGEMENT SYSTEMS

5.2.8.1 PROJECT COMPONENT DESCRIPTION

The water management systems on site include:

- Milne Port and Mine Site
 - Ore Stockpile settling ponds
- Milne Port
 - Water Treatment System
 - Sewage Treatment System
- Mine Site
 - Raw Water System
 - Contact Water Ponds
 - (1) Open Pit Dewatering System
 - (2) Stockpile Settling Ponds
 - Water Treatment System
 - Sewage Treatment System

ORE STOCKPILE SETTLING PONDS

The stockpile settling ponds were constructed to temporarily retain the runoff water from stockpile areas and contain the sediment load to meet the water quality standards in accordance with applicable effluent quality criteria. During normal operation, runoff from the stockpile area drains to the stockpile settling ponds. The ponds are equipped with overflow weirs designed to allow the unloaded surface water to drain through a controlled discharge to permitted discharge point(s). The ponds were designed with sufficient retention time to ensure the sediment would gravity-settle to the bottom of the pond before the water reaches the overflow weirs.

The ponds have been constructed rectangular in shape to optimize the earthworks materials (granular fills and liners) and to fit within the foreshore areas and not encroach near the shoreline. The pond berms have design side slopes not steeper than 3H:1V and the berm top width is 2.0 m to meet the access and liner anchoring requirements. The overflow weir design slopes are 5H:1V exiting the pond. The ponds were excavated to meet the elevation requirements of the design, and the berms constructed with raised earthworks. It has been sealed with exposed HDPE liner material for storage of the runoff and sediments without any leakage.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 149 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

MILNE PORT – WATER TREATMENT SYSTEM

The Milne Port water treatment system includes an adsorption clarifier water treatment plant designed to treat raw water for the removal of colour, turbidity and other impurities to provide a high-quality effluent. The high-quality effluent from the adsorption clarifier is then disinfected for potable and domestic use. The process combines flocculation and clarification in the mono-media roughing filter. Flocs are formed and retained in the coarse mono-media. The dual media filter provides polishing of the pre-treated water to provide a high-quality effluent. Disinfection involves UV and chlorination.

The Milne Port water treatment building is a foldaway building located west of the new accommodation facilities. The system includes the outdoor piping connecting the water treatment plant to the sewage treatment plant, and the piping between the water treatment plant and the accommodations facility. The system is fed by water truck. The Project is approved to source water from km 32 Lake and from Phillips Creek (summer months only).

MILNE PORT – SEWAGE TREATMENT SYSTEM

The Milne Port sewage treatment plant (STP) is a membrane bioreactor (MBR) wastewater treatment plant designed for treatment of domestic wastewater. The STP is a packaged plant that comes with containerized inlet screen, equalization tank, post equalization tank screen, aeration tank, membrane tanks, UV disinfection systems and a sludge dewatering unit. The plant is housed inside six (6) 40 ft modified high-cube shipping containers that were interconnected when installed. The system includes the outdoor piping connecting the accommodations facility to the sewage treatment plant, the effluent discharge piping and the potable water inlet. During normal operation, the treated effluent from the sewage treatment plant (STP) is pumped 750 m to the permitted discharge point at Milne Inlet via the treated effluent discharge above ground pipeline.

The Mine Site Water Systems include the facility's raw water system (including the raw water jetty), water treatment system, sewage treatment system, and the treated effluent discharge system.

OFF-SPEC EFFLUENT PONDS

The off-spec effluent pond(s) have been constructed to store the off-spec effluent from the Project Sewage Treatment Plant (STP). The pond(s) have been constructed as rectangular shape to optimize the earthworks materials (granular fills and liner). The pond berms have side slope not steeper than 3H:1V and the berm top width is 3.0 m to meet the access and liner anchoring requirements. The pond(s) have been constructed with raised earthworks on top of the laydown pads. It has been sealed with liner material for storing the off-spec effluent without any leakage.

MINE SITE – RAW WATER SYSTEM

The Mine Site raw water system is a pumping arrangement that draws water from Camp Lake (west of the main accommodation facilities) to the water treatment system for treatment and distribution. The raw water system includes a raw water pumphouse (a heated and insulated sea container) installed on a

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 150 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

jetty built out from the east side of Camp Lake. The pump draws water up through the wet well below the pumphouse, and pumps the water through a 100 mm (4 inch) HDPE DR11 pipeline over 4 km to the water treatment building.

MINE SITE – WATER TREATMENT SYSTEM

The Mine Site water treatment system includes an adsorption clarifier water treatment plant designed to treat raw water for the removal of colour, turbidity and other impurities to provide a high-quality effluent. The high-quality effluent from the adsorption clarifier is then disinfected for potable and domestic use. Disinfection involves UV and chlorination. The system is fed by the raw water system drawing from Camp Lake.

The Mine Site water treatment building is a foldaway building located south of the fuel tank farm and southwest of the sewage treatment building. The system includes the outdoor piping connecting the water treatment plant to the sewage treatment plant, and the piping between the water treatment plant and the accommodations facility.

MINE SITE – SEWAGE TREATMENT SYSTEM

The Mine Site sewage treatment plant (STP) is a membrane bioreactor (MBR) wastewater treatment plant designed for treatment of domestic wastewater. The STP is a packaged plant that comes with containerized inlet screen, equalization tank, post EQ screen, aeration tank, membrane tanks, UV disinfection systems and a sludge dewatering unit. The plant is housed inside six (6) 40 ft modified high-cube shipping containers that were interconnected when installed. The Mine Site sewage treatment plant is located southeast of the fuel tank farm, north east of the water building, and south of the accommodations facility. The system includes the outdoor piping connecting the accommodations facility to the sewage treatment plant and the connection for the effluent discharge piping.

MINE SITE – TREATED EFFLUENT DISCHARGE

During normal operation, the treated effluent from the STP is pumped to the permitted discharge points at Mary River via the above ground, 2-km-long treated effluent discharge pipeline. In the event that the treated effluent does not meet discharge requirements, the off-spec effluent would be trucked from the STP to one of the three existing PWSPs for storage and eventual treatment/discharge as required. Once the ‘problem’ in the STP is corrected, the off-spec effluent from the pond(s) will be treated insitu or transported via vacuum truck and re-processed through the STP before directly discharging to Mary River. The treated effluent discharge pipeline is a 50 mm (2 inch) diameter HDPE DR11 pipeline from the STP to the tee connection (valve box/branch) with the remainder of the pipeline (from the valve box/branch to the Mary River discharge) being 75 mm (3 inch) diameter HDPE DR11. The pipeline is approximately 2 km long, above ground, pre-insulated with 50 mm (2 inch) insulation and heat traced for year-round use.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 151 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

5.2.8.2 PRE-DISTURBANCE, EXISTING, AND FINAL SITE CONDITIONS

The pre-disturbance site conditions are summarized in Section 3. Appendix C provides a photolog showing the current mining operations.

Water management facilities at the Mine Site will be modified to account for changes to the crusher pad associated with the 12 Mtpa North Rail operation. A new crusher pad will be constructed along with a new stormwater pond. A stream diversion will be required to divert water away from the crusher pad. Fish are not present within the section of stream (referred to as Sheardown Lake Tributary 12 in the FEIS) that will be affected by the diversion. Drawings of the crusher pad and pond are included as Attachment 10.3 of Baffinland's Application to Amend Type A Water Licence 2AM-MRY-1325. The existing crusher pad and stormwater pond will be decommissioned once the new water management features are in place and shown to be functioning effectively.

Similarly, water management at Milne Port will undergo changes to accommodate larger ore stockpiles and new facilities associated with ore crushing and the North Railway. The Milne Port Water Management Plan presented as Attachment 10.2 of Baffinland's Application to Amend Type A Water Licence 2AM-MRY-1325 contains layouts showing water management features including ditches, diversions and ponds.

Disturbances to the surrounding areas of the Project may cause thermal disruptions to the permafrost zone resulting in ponding, settlement and/or subsidence due to changes in the active zone (the upper 1 to 2 m of soil). During closure these areas will be drained of excess water, filled with clean material to insulate and re-establish the active layer and graded, restoring the natural drainage of the area as necessary. The natural drainage of water courses will be re-established for long-term stability.

Stockpile settling ponds will be removed during closure, following decommissioning of the ore stockpiles, when management/treatment of site drainage is no longer required.

The Milne Port and Mine Site water treatment systems buildings will be removed and re-used. Outdoor piping will also be removed and affected footprints regraded to restore natural drainage patterns where possible, and scarified to allow for natural re-vegetation.

The Milne Port and Mine Site sewage treatment plants will be removed and potentially reused. Outdoor piping including the treated effluent discharge system will also be removed and affected footprints regraded to restore natural drainage patterns where possible, and scarified to allow for natural re-vegetation.

The off-spec effluent pond(s) will be removed concurrently with the decommissioning of the sewage treatment plants. The affected footprints will be regraded to restore natural drainage patterns where possible, and scarified to allow for natural re-vegetation.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 152 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

5.2.8.3 CLOSURE OBJECTIVES AND CRITERIA

The closure objectives are presented in Section 5.1.1 and closure criteria are presented in Table 5.1.

5.2.8.4 CONSIDERATION OF CLOSURE OPTIONS AND SELECTION OF CLOSURE ACTIVITIES

Detailed alternative analysis of other closure options have not been completed by Baffinland due to the early stage of the Project and the absence of Project components which represent the largest uncertainty at closure (Open Pit, Permanent Waste Rock Stockpile). As data are collected and analysis is conducted, the ICRP will be updated as required. Please refer to Appendix D for more detail on existing reclamation research plans relevant to the Project to address uncertainties related to final closure.

Although modifications to the existing water management infrastructure and corresponding sequencing of their closure may change, no significant closure options are expected to be considered for this mine component as no structures are planned to remain following reclamation.

5.2.8.5 ENGINEERING WORK ASSOCIATED WITH CLOSURE ACTIVITY

The water supply system at the Mine Site and Milne Port will be demolished, removed and either sealifted to the mainland for disposal/salvage or will be disposed of in the onsite landfills or other approved repository.

The sewage treatment plants located at the Mine Site and Milne Port will be decommissioned as per the manufacturer's specifications. The remaining sewage treatment plant components will be either transported for sealift to the mainland for disposal or salvaged or disposed of in the onsite landfill.

The site water management ponds (Off-spec, Stockpile Settling Ponds, etc.) will be decommissioned when they are no longer required and water quality is found to consistently meet effluent criteria ((Section 5.1.1). Ponds will be decommissioned as follows:

- Soils and sediment will be tested as part of the Site Environmental Assessment work and impacted soils and sediment will be cleaned up as necessary (Section 9.6);
- Liners, where present, will be removed and disposed of in non-hazardous waste containment area;
- The ponds will be filled with clean material and perimeter berms will be regraded to restore natural drainage patterns;
- The ground will be scarified around the pond areas to encourage natural revegetation.

Water crossings (bridges and culverts) will be decommissioned and the drainage channels restored to natural drainage conditions.

As pumping equipment is no longer required (cessation of mine dewatering, decommissioning of a pond, decommissioning of a water treatment plant, etc.), the associated pumps and pipes will be

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 153 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

decommissioned. Pipes will be disposed of in the non-hazardous waste areas and ownership of pumps will either transferred (sold) off-site or donated to the local communities.

5.2.8.5.1 MATERIALS SUITABILITY FOR CLOSURE NEEDS

Reclamation activities shall restore the physical and chemical stability of areas where material was removed or altered for Project purposes (i.e., excavation activities). Reclamation activities may include, but are not limited to, replacing those affected areas with suitable cover materials sourced locally, importing/producing fill, restoring drainage to limit unnatural standing water through re-grading, routing of any trapped surface water and scarification. All such reclamation activities shall be performed in a manner that will reduce the risk of erosion and sedimentation to the surrounding environment and limit disturbance to the permafrost.

Criteria for sourcing suitable materials for closure needs requires consideration of several chemical (i.e., pH, sodicity, salinity, saturation, etc.) and physical (i.e., texture, moist consistency, content, etc.) properties. A comprehensive assessment of suitable materials for closure needs will be completed prior to the use of any material for cover purposes focusing on the following objectives:

- Identifying and mapping suitable locations of material as well as its distribution. Locations will be evaluated for chemical and physical stability, impact to natural environment, etc.
- Geochemical and physical characteristics for suitability for reclamation such as the consistency to prevent erosion, porosity, ability to alter natural snow and water runoff conditions, stability, etc.
- Determining depth and volumes of material types
- Development of a schedule of availability.

5.2.8.6 PREDICTED RESIDUAL EFFECTS

The predicted residual effects at planned closure, including those encompassing water management, were assessed as part of the FEIS with respect to VEC/VSEC. These effects, and the methods for their assessment are summarized in Appendix G. With the removal of facilities and rehabilitation of the previously disturbed land, residual effects are expected to be limited to loss of vegetation within the PDA; it is not expected that disturbed areas will become re-vegetated until after closure of the mine. Regeneration of the disturbed area is a slow process and will not occur until beyond the life of the project.

As the project progresses, data will be collected through the environmental monitoring programs which can provide an indication of the accuracy of the predicted effects. These data can also be used to give an indication of the performance of the site mitigative measures and management systems, used as the basis for revising the prediction of residual effects, or implementing adaptive management.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 154 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

5.2.8.7 UNCERTAINTIES

Uncertainties related to the decommissioning of water management systems include whether or not there are associated contaminated soils (Section 9.6), and there may be uncertainty in revegetation success, addressed in a reclamation research program (Appendix D).

5.2.8.8 POST CLOSURE MONITORING, MAINTENANCE AND REPORTING

Post-closure monitoring of waste rock and overburden piles includes geotechnical/engineering monitoring (Section 9.4), aquatic monitoring (Section 9.5), Environmental Site Assessment (Section 9.6), fauna and flora monitoring (Section 9.7), safety compliance inspection (Section 9.9), and air quality monitoring (Section 9.11). Maintenance required will depend on the outcome of the monitoring programs, and would be completed as outlined Table 5.1. Baffinland will report on the results of all monitoring programs on an annual basis to the NIRB (as per Project Certificate No. 005 and its Amendment), AANDC Land Lease 47H/16-1-2, the NWB (as per Type 'A' Water Licence 2AM-MYR-1325 Amendment No. 1) and the Land Owners (as per Commercial Lease Q13C301).

5.2.8.9 CONTINGENCIES

The need for contingencies for the reclamation of mine infrastructure has not been identified by Baffinland at this time. As the project progresses, the need for adaptive management and contingency alternatives may arise due to the outcomes of discussions with the MCWG.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 155 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

6 PROGRESSIVE RECLAMATION

6.1 DEFINITION OF PROGRESSIVE RECLAMATION

Most of the Project areas will be actively used during the Construction and Operation phases of the Project, although where practical, areas which are no longer needed to carry out Project activities will be progressively reclaimed. As per CIRNAC Guidelines⁶, “Progressive reclamation takes place prior to permanent closure to reclaim components and/or decommission facilities that no longer serve a purpose. These activities can be completed during operations with the available resources to reduce future reclamation costs, minimize the duration of environmental exposure, and enhance environmental protection. Progressive reclamation may shorten the time for achieving closure objectives and may provide valuable experience on the effectiveness of certain measures that might be implemented during permanent closure.”

6.2 OPPORTUNITIES FOR PROGRESSIVE RECLAMATION

This section describes the proposed progressive rehabilitation measures that will be completed during the construction and/or operation phases of the Project. In accordance with the objectives and guidelines presented in Section 5.1.1, progressive rehabilitation will be implemented to achieve the Projects site abandonment goal and closure principles. Table 6.1 presents Baffinland’s proposed progressive rehabilitation schedule. This schedule will be updated in future ICRPs as additional opportunities are identified.

Table 6.1: Summary of Conceptual Current and Proposed Progressive Rehabilitation Schedule

Phase:	Construction (ERP)				Operation (ERP)				Construction (Phase 2)				Operation (Phase 2)			
Year:	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4
Milne Port																
PWSP (exploration)																
Bladder Farm																
Quarry (Q1)																
Mary River Mine Site																
Bladder Farm																
Quarry (QMR2)																
Laydown Areas																

⁶ MVLWB/AANDC, Guidelines for the Closure and Reclamation of Advanced Mineral Exploration and Mine Sites in the Northwest Territories, November 2013

Table 6.1: Summary of Conceptual Current and Proposed Progressive Rehabilitation Schedule

Phase:	Construction (ERP)				Operation (ERP)				Construction (Phase 2)				Operation (Phase 2)			
Borrow Pits																
Crusher Pad																
Stormwater Pond																
Rail Route																
Rail Access Road																

6.2.1 PROPOSED PROGRESSIVE REHABILITATION MEASURES

The overall intent of the proposed progressive rehabilitation measures is to assist in achieving Baffinland's site abandonment goal to return project sites and affected areas to viable and, wherever practicable, self-sustaining ecosystems that are compatible with a healthy environment and with human activities in as minimal duration as reasonably practical. The progressive rehabilitation measures proposed as part of the ICRP are expected to be technically and economically feasible and reflect Project closure principles. Closure criteria, to determine if the closure objectives outlined in subsections below have been achieved by closure activities, are consistent with the closure criteria described in Table 5.1. It should be noted participation of the local communities, through their QIA representatives, and other applicable government stakeholders, in the consideration of alternative progressive reclamation activities is encouraged via the MCWG (refer to Section 2.4 for more information). The experience gained and lessons learned from the closure of the Nanisivik and Polaris mine sites, which are located in a similar climate zone, will be used, where applicable, as a benchmark for the progressive rehabilitation of disturbed Project areas.

6.2.1.1 LANDFARM OPERATION

Hydrocarbon-contaminated soils will be excavated and treated in the Project landfarm(s) throughout the life of the Project to maintain the chemical stability of the site and any discharges. During Operations, soils treated in Project landfarm(s) that meet Nunavut Contaminated Site Remediation Tier-1 Guidelines⁷ for industrial/commercial land uses will be used in select locations. The use of treated soils meeting these criteria is restricted to areas deemed as a low risk of exposure to transportation pathways and a defined in prescribed operational control procedures. During Operations, soils treated in Project landfarm(s) that meets Nunavut Contaminated Site Remediation Guidelines⁸ for agricultural or residential land uses will be spread over land as or used of as cover material. Soils treated in Project landfarm(s) that do not meet

⁷ Environmental Guideline for Contaminated Site Remediation, Department of the Environment, Government of Nunavut, March 2009

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 157 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Nunavut Contaminated Site Remediation Guidelines⁸ for industrial/commercial land uses will be kept in containment for further treatment. Another approach that may be utilized is a risk-based methodology for the establishment of hydrocarbon criteria that are protective of human and ecological health. The methods to be followed are outlined Canadian Council of Ministers of the Environment (CCME) Canada-Wide Standards for Petroleum Hydrocarbons (PHC) In Soil (2008).

Once no longer required, landfarms will be closed as described in Section 5.2.7.

6.3 COMPLETED PROGRESSIVE RECLAMATION

To date, progressive reclamation efforts have commenced, or been completed, at several areas on site. Reductions in reclamation security in response to successfully demonstrating closure criteria have been met. The following lists progressive reclamation works have occurred to date, as well as the publicly available reports summarizing completed activities:

- Fuel Bladder Farm at Milne Port. See Appendix E.8 of the 2014 QIA and NWB Annual Report for Decommissioning Reports related to this activity.
- Quonset Hut at the Mine Site. See Appendix E.8 of the 2014 QIA and NWB Annual Report for Decommissioning Reports related to this activity.
- Calcium chloride salt storage. Ongoing long-term management of calcium chloride salt storage and use at the Project Site includes waste segregation of salt bags and proper disposal of collected materials in accordance with Baffinland's Waste Management Plan (BAF-PH1-830-P16-0028) as well as identifying and containing compromised salt packages to prevent materials being distributed around the site. Currently salt is stored at both the Mary River Mine Site and Milne Port Site for use in future exploration drilling as well as for dust suppression on Project roads and camp pads.
- Km 97 Borrow Source. Borrowing in this area has led to thawing of the underlying permafrost soils, which has caused considerable increase in ponded water; and, there is settlement resulting from thaw of both the ground ice in the soil matrix and thaw of ice wedges. Although approved, due to resource limitations, only minor work was completed thus far. See the Borrow Source Reclamation Plan, Milne Inlet Tote Road, Km 97, submitted to AANDC on June 19th, 2015.
- Disposal and off-site transport of historical inventory of remaining incinerator bottom ash at the Mine Site and Milne Port. Ash that was tested and determined to be non-hazardous was disposed of at the Landfill Facility while ash that was identified as hazardous was transported off-site for disposal in a licenced facility in Southern Canada. See Appendix E.2 of the 2015 QIA and NWB Annual Report for more information related to this activity.
- Demobilization of equipment and supplies not required for near term activities, as well as the current inventory of hazardous waste and other materials by means of sealift from Milne Port Site was

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 158 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

undertaken in 2015. See Appendix E.4 of the 2015 QIA and NWB Annual Report for more information related to this activity.

- Decommissioning activities completed for former contractor (Nuna) work shop no longer required at Milne Port to provide for the completion of the southeast extent of Ore Stockpile Pad. Decommissioning activities included disassembly of the building structure, remediation of the underlying soil footprint, removal of structure power supply (generators) and remediation of the underlying soil footprint of the west generator. Refer to Appendix E.8.1 of the 2015 QIA and NWB Annual Report for the Nuna Shop Decommissioning Report.
- Former Rotary Biological Contactor (RBC) sewage treatment plant was removed from the site by the contractors.
- Commencement of decommissioning of the Mine Site Bladder Farm and Generator Berm Bladder at the Mine Site exploration camp. The bladders and piping was removed from these facilities. A single bladder containing oily water remains in the Mine Site Bladder Farm. The lined berms will be converted to other uses such as the storage of drummed fuel.
- Ongoing management of hydrocarbon impacted soils from historical decommissioning efforts, as well as from period spills resulting from day-to-day fuel handling and management activities at both the Mine site and Milne Port. These soils have been placed in the Milne Port Landfarm Facility for biotreatment to meet the objectives as outlined in the Government of Nunavut's Environmental Guideline for Site Remediation, 2010. For approximate quantities of hydrocarbon impacted soils deposited in the Landfill Facility during 2015, refer to Table 2.5.2 of the 2015 QIA and NWB Annual Report.
- Disassembly of contractor (Anmar) tent structure and equipment was completed after a large-scale fire at Milne Port. The fire debris, residual waste material, and soils were characterized under the direction of a qualified consultant provided by Qikiqtaaluk Environmental Inc. (QE). The hazardous and potentially hazardous waste material was sorted and packaged for off-site transport to waste receiving facilities in Quebec. Refer to Appendix E.8.2 of the 2015 QIA and NWB Annual Report for QE's final summary report for the remediation conducted. The report includes the manifests and Certificates of Disposal/Recycling provided by the receiving facilities.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 159 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

7 TEMPORARY CLOSURE

7.1 SHORT-TERM TEMPORARY MINE CLOSURE – CARE AND MAINTENANCE

Short-Term Temporary “Care and Maintenance” activities will occur when the Project ceases operations for a period of less than one (1) year with the intent of resuming operational activities or final closure activities. When entering a “Care and Maintenance” phase, the main objective is to maintain all equipment and facilities in a state of readiness to resume operation with minimal delay or have project components at the ready for use to support closure activities.

Care and maintenance of the Project sites will be implemented and executed by operational maintenance staff and other support personnel on site and will be carried out within approximately six (6) months of the initiation of the Temporary Closure Care and Maintenance phase based on the level of effort required. Access to the Project sites, buildings and structures will be restricted to authorized persons only, as during operations. Buildings where potential hazards exist will be locked or otherwise secured.

The Mine Site Reclamation Policy for Nunavut (2002) and the Guidelines for the Closure and Reclamation of Advanced Mineral Exploration and Mine Sites in the Northwest Territories (2013) require that contingency measures be established in the ICRP for Temporary Closure of a mine site. Temporary closure is defined as the planned shutdown of a mine site for a period of less than one (1) year. This section of the report presents the plans for suspension of activities of less than one (1) year. Section 0 below covers Long-term Temporary Closure beyond one year.

7.1.1 HEALTH AND SAFETY OF WORKERS AND THE PUBLIC DURING TEMPORARY CLOSURE

The health and safety of workers and the Public will be ensured during Temporary Closure Care and Maintenance. Infrastructures will be kept secure by routine maintenance and inspections to eliminate any hazard to the public health and safety or material erosion to the terrestrial or aquatic receiving environment at concentrations that are harmful. Access to buildings and infrastructures will be restricted to authorized personnel only (Section 7.1.2).

Employees on site will be trained in site-specific health and safety requirements. Baffinland commits to abide by all applicable *NWT/Nunavut Mines Health and Safety Act* and Regulations, and the *Explosives Use Act*.

Baffinland will ensure that emergency procedures are updated, if required, and implemented and that all equipment necessary to properly carry out these procedures will be accessible and kept in good working condition.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 160 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

7.1.2 RESTRICTION OF ACCESS AND SITE SECURITY

During Temporary Closure Care and Maintenance, the Mine Site and Milne Port will be maintained in a secure condition through the provision of on-site site security. Mine dewatering and water treatment, where required, will be ongoing. As a result, a number of operational maintenance staff, environmental personnel and other support personnel will be onsite at the Mine Site and Milne Port. Access to buildings, structures, and storage compounds will be restricted to authorized persons, as during operations. Buildings where potential hazards exist will be locked or otherwise secured. Fences and/or barriers with signs will be constructed to restrict access as required.

Security personnel will carry out routine inspections of security, safety and environmental measures and maintain a record of these inspections. Contact information will be provided to pertinent government and Inuit agencies to facilitate their communication and potential access to the Mine Site and/or Milne Port, if and when necessary.

The explosives contractor will manage explosives in accordance with applicable regulatory requirements as per the NRCan Permit, including the *Mine Health and Safety Act*.

During Temporary Closure Care and Maintenance, reclamation activities such as re-grading may continue as per the progressive reclamation plan (Section 6). Erosion and discharge streams will be controlled as part of regular maintenance activities. Additionally, all unused pipelines will be drained and/or care will be taken that lines and pipes do not freeze and rupture.

7.1.3 SECURITY OF MINE OPENINGS

Due to the current configuration of Deposit No 1 as an above grade deposit, an open pit is not expected to occur until years 10 to 12 of operation at full production volume (21.5 Mtpa nominal). If a pit exists, the entrance ramp to the open pit will be fenced using boulders or other means to prevent inadvertent access. Signage indicating an “Open Hole” will already be in place around the open pit perimeter during operations as per NWT/Nunavut *Mines Safety Act* Regulations. In a short-term temporary closure scenario where suspension of mining activities is expected to last less than one year, pit dewatering and the subsequent treatment and discharge would likely continue in a manner consistent with ongoing operations at the time.

7.1.4 SECURITY OF MECHANICAL, HYDRAULIC SYSTEMS AND ELECTRICAL SYSTEMS

During Temporary Closure Care and Maintenance, equipment required for the security and safety of the infrastructure systems, including environmental aspects, will be maintained in working condition.

Buildings will be locked or otherwise secured to prevent inadvertent access once the Mine Site, Tote Road, North Railway and Milne Port are evacuated by the majority of the personnel, except as required by the onsite staff for site maintenance and security. Non-essential machinery, equipment and systems will be left in a no-load condition or removed from site. Live electrical systems will be fenced, locked, or otherwise

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 161 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

secured against inadvertent entry or contact, and appropriate signs will be placed to warn of potential hazards.

7.1.5 HAZARDOUS MATERIALS & WASTE MANAGEMENT SITES

During or prior to Temporary Closure Care and Maintenance, an inventory of all hydrocarbon products, chemicals, explosives and hazardous wastes/materials (e.g., used oils, ammonium nitrate and greases) will be updated and the materials stored in a secure and environmentally sound manner.

All storage facilities that contain any such materials will be secured and monitored. Inert waste will be disposed of in the landfill site at the Mine Site or other approved repositories.

During Temporary Closure Care and Maintenance, the non-hazardous waste management facilities at the Project will continue as in normal operations on an as-required basis. If waste management facilities are no longer required, landfills will be covered with 1.5 m of overburden.

If the Temporary Closure Care and Maintenance phase lasts longer than one (1) year, all hazardous materials and wastes will be removed from Project sites via sealift and disposed of at a licensed hazardous waste disposal facility in Southern Canada (Section 7.3.5).

7.1.6 DOCKS AND AIRSTRIP

During Temporary Closure Care and Maintenance activities, the airstrip, dock infrastructure and equipment will be left in place. All non-essential airstrip and dock machinery, equipment and systems will be left in a no-load condition. Live electrical systems will be fenced, locked, or otherwise secured against inadvertent entry or contact, and appropriate signs will be placed to warn of potential hazards.

7.1.7 CONTROL OF EFFLUENTS

The water management requirements at the Mine Site and Milne Port during Temporary Closure Care and Maintenance will include:

- Domestic sewage treatment
- Surface/discharge waters, as per applicable regulatory requirements

The drainage system established during operations will be retained and surface water will continue to collect in existing settlement ponds and, where required by the Water Licence, waters will be treated prior to discharge to the receiving environment.

The waste rock stockpile will be monitored during operations (Section 9). Current investigations identify that most of the waste rock will not be prone to metal leaching or acid drainage; however, if ongoing work characterization studies show that the minor portion waste rock that is potentially acid generating (PAG) could cause unacceptable impact to runoff and seepage, the waste rock stockpile construction strategy will be modified accordingly. If treatment is required, water will be batch treated with lime dosing for Acid

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 162 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Rock Drainage (ARD) affected water or a treatment plant such as a High Density Sludge (HDS) treatment plant may be provided.

The Life-of-Mine Waste Rock Management Plan (BAF-PH1-830-P16-0031) provides treatment options in the event that waste rock run-off requires treatment. The Fresh Water Supply, Sewage, and Wastewater Management Plan (BAF-PH1-830-P16-0010) provide the design criteria and operations and maintenance requirements for the collection and treatment of the site's wastewater.

7.1.8 STABILIZATION OF STOCKPILES

Ore and waste rock stockpiles will be visually assessed for stability at the start of the Temporary Closure Care and Maintenance period and stabilized if required. The stockpiles will be periodically inspected.

7.1.9 SITE INSPECTION PROGRAM

The general site areas at the Mine Site, Milne Port, North Railway, and Tote Road will be periodically inspected by onsite security personnel. Visual inspections of the Mine Site and Milne Port will be carried out to verify the physical stability of quarries/borrow pits, waste rock stockpiles, and pit walls. Section 9 identifies the environmental management and monitoring plans that will be implemented during any potential Temporary Closure Care and Maintenance period.

7.1.10 NOTIFICATION OF TEMPORARY CLOSURE

Employees, local communities, and the public will be notified in advance of any scheduled short-term temporary closure activities.

7.2 SHORT-TERM TEMPORARY CLOSURE MONITORING, MAINTENANCE, AND REPORTING

During the Temporary Closure Care and Maintenance period, all terms and conditions of Type 'A' Water Licence 2AM-MYR-1325 will remain in force. "Care and Maintenance" monitoring program will include routine inspection, monitoring and reporting as required by Type 'A' Water Licence Amendment No.1 2AM-MYR-1325 and its associated management plans. As the facilities are not operational, key monitoring requirements are established within the following management plans:

- Environmental Protection Plan (BAF-PH1-830-P16-0008)
- Surface Water, Aquatic Ecosystems, Fish and Fish Habitat Management Plan (BAF-PH1-830-P16-0026)
- Terrestrial Environmental Management and Monitoring Plan (BAF-PH1-830-P16-0027)
- Fresh Water, Sewage and Wastewater Management Plan (BAF-PH1-830-P16-0010)
- Air Quality and Noise Abatement Management Plan (BAF-PH1-830-P16-0002)
- Emergency Response Plan (BAF-PH1-830-P16-0007)
- Spill Contingency Plan (BAF-PH1-830-P16-0036)

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 163 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

- Explosives Management Plan (BAF-PH1-830-P16-0009)
- Waste Management Plan (BAF-PH1-830-P16-0028)
- Hazardous Materials and Hazardous Waste Management Plan (BAF-PH1-830-P16-0011)
- Life-of-Mine Waste Rock Management Plan (BAF-PH1-830-P16-0031)
- Aquatic Effects Monitoring Plan (BAF-PH1-830-P16-0039)
- Roads Management Plan (BAF-PH1-830-P16-0023)
- DRAFT Railway Operation and Maintenance Management Plan (no document number)

Throughout a Temporary Closure Care and Maintenance period, Baffinland would continue to report on its activities on an annual basis to the NIRB (as per Project Certificate No. 005), the NWB (as per Type A Water Licence 2AM-MYR-1325 Amendment No. 1) and the Land Owners (as per Commercial Lease Q13C301). If a Care and Maintenance monitoring schedule is required differing from Operations, it will be established in compliance with the applicable management plans, in consultation with applicable regulators.

During any care and maintenance period, regulatory compliance monitoring will continue to abide by all applicable project authorizations. Environmental Monitoring Programs may be modified and/or suspended, in consultation with applicable regulators and land owners, until recommencement of Operations.

7.3 LONG-TERM TEMPORARY MINE CLOSURE AND SUSPENSION OF ACTIVITIES

Baffinland may extend the mine closure over a longer timeframe than one (1) year should economic conditions deteriorate while the facility is in Temporary Closure Care & Maintenance. In the event the Project ceases operation for a period of greater than (1) year with the intent of resuming activities in the future, Long-Term Temporary Mine Closure activities will occur. Long-term Temporary Mine Closure activities will ensure the Project sites are maintained in a secure condition, and all facilities and equipment are de-energized and winterized. Hazardous waste and explosives would be removed from the site. Personnel necessary, including environmental personnel, to maintain site security and project monitoring requirements would remain on site.

A detailed “Long-term Care and Maintenance Plan” would be submitted to the NWB and the Land Owner at least 60 days prior to entering the Long-term Mine Closure period. Site personnel will conduct general inspections periodically and may decrease that frequency if the site inspections indicate that the site infrastructure is stable. A record of these inspections will be maintained. The names of contact persons will be provided to the pertinent regulators and government agencies such as CIRNAC and Landlord for their information, and to facilitate their access to the site, if and when necessary. The Project could reopen

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 164 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

when the circumstances requiring the Long-term Temporary Closure change (e.g., when economic or other conditions that caused the temporary cessation of operations is no longer of concern).

The following sub-sections describe the detailed activities that would be undertaken to secure the Project components in the event of Long-Term Temporary Mine Closure. Once these measures have been implemented, the labour force on site is reduced to the minimum required to ensure security of the site and ongoing monitoring requirements. It is expected the following activities will be carried out within approximately six (6) months of the initiation of Long-term Temporary Closure based on the level of effort required.

7.3.1 HEALTH AND SAFETY OF WORKERS AND THE PUBLIC DURING LONG-TERM TEMPORARY CLOSURE

Health and safety of workers and the Public will be ensured during Long-term Temporary Closure. Infrastructures will be kept secure by routine maintenance and inspections to eliminate any hazard to the public health and safety or material erosion to the terrestrial or aquatic receiving environment at concentrations that are harmful.

Access to buildings and infrastructures will be restricted to authorized personnel only (Section 7.3.2). Safety will be reinforced by an inspection program (Section 7.3.9).

Employees on site will have been trained for site-specific health and safety. Baffinland commits to abide by the NWT/Nunavut *Mines Safety Act* and Regulations, and the *Explosives Use Act*.

It will be ensured that emergency procedures will be applicable and that all equipment necessary for these procedures will be accessible and kept in good working condition.

7.3.2 RESTRICTION OF ACCESS AND SITE SECURITY

During Long-term Temporary Closure, the Mine Site and Milne Port will be maintained in a secure condition. Access to the buildings, structures and storage compounds will be locked and/or fenced/gated. Potentially unsafe areas will be posted with appropriate signage. Unused machinery and equipment will be removed, where practical.

The explosives contractor will manage explosives in accordance with applicable regulatory requirements by NRCan and the *Mines Health and Safety Act*. On commencement of Long-term Temporary Closure, explosives will be either removed from the Project or/and detonated in a controlled and safe fashion by experienced and licensed personnel at appropriate locations away from sensitive receptors.

During Long-term Temporary Closure, reclamation activities such as re-grading will continue as per the progressive reclamation plan (Section 6). Erosion and discharge streams will be controlled as part of regular maintenance activities. Additionally, care will be taken that lines and pipes do not freeze and break.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 165 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

7.3.3 SECURITY OF OPEN PIT

Following notice of Long-term Temporary Closure the pit walls of the open pit will be inspected by a qualified engineer to assess the physical stability. Pit water will be monitored during the course of the operation for any indication of contamination at levels that exceed MDMER or may adversely affect the receiving environment. During Long-term Temporary Closure the decision to continue with dewatering of the open pit will be evaluated based on the planned duration of closure, and forecasts for market conditions at the time.

It is anticipated that the final configuration of the open pit will take an estimated 85 to 150 years to passively fill with water from natural sources such as direct precipitation and surface runoff (KP 2008). Therefore, it is anticipated that the open pit will not completely flood during Long-term Temporary Closure and drainage from the open pit is not considered to be a discharge issue.

Other Long-term Temporary Closure activities to close out the open pit include the following as per NWT/Nunavut *Mines Health and Safety Act* Regulations:

- Barricading access ramps into the open pit.
- Placing of fencing and “Danger”/“Open Hole” signage as necessary.
- Baffinland will engage communities and land users to help assess if additional access restrictions are required. This feedback will focus on effective language for signage, and identification of the priority locations for barriers to deter land users and wildlife.

7.3.4 SECURITY OF MECHANICAL, HYDRAULIC, AND ELECTRICAL SYSTEMS

All buildings will be locked and/or otherwise secured to prevent inadvertent access once the Project is evacuated by the majority of the personnel, except as required by the onsite staff for site maintenance and security. All non-essential machinery, equipment and systems will be left in a no-load condition. Live electrical systems will be fenced, locked, or otherwise secured against inadvertent entry or contact, and appropriate signs will be placed to warn of potential hazards.

7.3.5 HAZARDOUS MATERIALS AND WASTE MANAGEMENT SITES

Inert waste will first be disposed of in the landfill site at the Mine Site or other approved repositories. During operations the landfills will be covered with an interim soil cover layer to reduce infiltration and promote permafrost advancement within the waste. As such, contaminated runoff or seepage from the landfill sites are not anticipated during Long-term Temporary Closure. The required thickness of the soil cover to completely encapsulate waste in permafrost will be informed by thermistor measurements at the site.

During or prior to the Long-term Temporary Closure an inventory of all hydrocarbon products, chemicals, explosives and hazardous wastes (e.g., used oils, ammonium nitrate and greases) will be updated and all hazardous materials and wastes will be shipped south to the appropriate hazardous waste disposal facility

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 166 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

via sealift. All storage facilities that contained any such materials will be secured and monitored. Inert waste will be disposed of in the landfill site at the Mine Site or other approved repositories.

7.3.6 STABILIZATION OF STOCKPILES

At the onset of Long-term Temporary Closure the waste rock stockpile may undergo minor re-contouring and the physical and chemical stability of the waste rock stockpile will be assessed. Following this investigation and according to the stockpile geometry at the time of Long-term Temporary Closure, aspects related to erosion, runoff control, slopes, benches, and discharges will be addressed.

Ore stockpiles are expected to be depleted prior to Long-term Temporary Closure. In the event the ore stockpiles remain during Long-term Temporary Closure, they will be monitored.

7.3.7 DOCKS AND AIRSTRIP

During Long-term Temporary Closure activities, the airstrip, ore dock, ore dock office, and ship loader will be left in place. All non-essential machinery, equipment and systems will be left in a no-load condition. Live electrical systems will be fenced, locked, or otherwise secured against inadvertent entry or contact, and appropriate signs will be placed to warn of potential hazards. The dock office will be secured to prevent inadvertent access. Infrastructure will be kept secure by routine maintenance and inspections to eliminate any hazard to the public health and safety or material erosion to the terrestrial or aquatic receiving environment at concentrations that are harmful. The names of contact persons will be provided to the pertinent regulators and government agencies such as CIRNAC for their information, and to facilitate their access to the site, if and when necessary.

7.3.8 CONTROL OF EFFLUENTS

Mine Site and Milne Port water management will be required during Long-term Temporary Closure, including:

- Domestic sewage treatment
- Surface/discharge waters, as per applicable regulatory requirements

Surface water will be collected in settlement ponds and those for the ore stockpiles and waste rock stockpile will be tested for MDMER requirements. The waste rock stockpile will be monitored during operations. Based on current investigations it is anticipated that most of the waste rock will not be prone to metal leaching or acid drainage. However, if ongoing work characterization studies show that the minor portion waste rock that is potentially acid generating (PAG) could cause unacceptable impact to runoff and seepage, the waste rock stockpile construction strategy will be modified accordingly. If treatment is required, water will be batch treated with lime dosing for Acid Rock Drainage (ARD) affected water or in a treatment plant such as a High-Density Sludge (HDS) treatment.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 167 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

The Life-of-Mine Waste Rock Management Plan (BAF-PH1-830-P16-0031) provides treatment options in the event that waste rock run-off requires treatment. The Fresh Water Supply, Sewage, and Wastewater Management Plan (BAF-PH1-830-P16-0010) provide the design criteria and operations and maintenance requirements for the collection and treatment of the site's wastewater.

7.3.9 SITE INSPECTION PROGRAM

The Project areas at the Mine Site, Milne Port, North Railway, and Tote Road will be periodically inspected by onsite security personnel. Visual inspections of the Mine Site and Milne Port will be carried out to verify the physical stability of quarries/borrow pits, docks, and port facilities, waste rock stockpiles, and pit walls. The environmental management and monitoring requirements for the Long-term Temporary Closure Care and Management period are identified in Section 7.4.

7.4 LONG-TERM TEMPORARY CLOSURE MONITORING, MAINTENANCE, AND REPORTING

During Long-term Temporary Closure, all terms and conditions of Type 'A' Water Licence Amendment No. 1 2AM-MYR-1325 would remain in force unless an amendment to this Licence is requested by Baffinland as part of the "Long-Term Care and Maintenance Plan". The application for a licence amendment would identify the changes proposed for the facilities required to be shutdown, the location of new discharges (if any), updates to any management plans and/or the AEMP (if required), and an indication of sites to be permanently rehabilitated. A monitoring schedule, if differing from Operations, will be established as part of the "Long-Term Care and Maintenance Plan" in compliance with the AEMP and other applicable Management Plans in consultation with applicable regulators.

Routine inspection, monitoring and reporting as required by the Type 'A' Water Licence 2AM-MYR-1325 Amendment No. 1 and its associated management plans remain applicable. As the facilities are not operational, key monitoring requirements are established within the following management plans:

- Environmental Protection Plan (BAF-PH1-830-P16-0008)
- Surface Water, Aquatic Ecosystems, Fish and Fish Habitat Management Plan (BAF-PH1-830-P16-0026)
- Terrestrial Environmental Management and Monitoring Plan (BAF-PH1-830-P16-0027)
- Fresh Water, Sewage and Wastewater Management Plan (BAF-PH1-830-P16-0010)
- Air Quality and Noise Abatement Management Plan (BAF-PH1-830-P16-0002)
- Emergency Response Plan (BAF-PH1-830-P16-0007)
- Spill Contingency Plan (BAF-PH1-830-P16-0036)
- Explosives Management Plan (BAF-PH1-830-P16-0009)
- Waste Management Plan (BAF-PH1-830-P16-0028)

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 168 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

- Hazardous Materials and Hazardous Waste Management Plan (BAF-PH1-830-P16-0011)
- Life-of-Mine Waste Rock Management Plan (BAF-PH1-830-P16-0031)
- Aquatic Effects Monitoring Plan (BAF-PH1-830-P16-0039)
- Roads Management Plan (BAF-PH1-830-P16-0023)
- DRAFT Railway Operation and Maintenance Management Plan (no document number)

Baffinland will continue to report on its activities throughout the Long-term Temporary Closure period on an annual basis to the NIRB (as per Project Certificate No.005, Amendment No. 1), the NWB (as per Type A Water Licence 2AM-MYR-1325 Amendment No. 1) and the Land Owners (as per Commercial Lease Q13C301).

Although regulatory compliance monitoring will continue to abide by all applicable project authorizations. Environmental Monitoring Programs outlined in the Project Certificate will likely be suspended in consultation with applicable regulators and landowners, until Operations recommence.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 169 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

8 INTEGRATED SCHEDULE OF ACTIVITIES

Based on current estimates of the level of effort required for closure activities, the primary Final Closure phase is expected to be three (3) years, with the flooding of the open pit continuing after the primary closure phase is completed. Following the Final Closure Phase a minimum of fifteen (15) years of post-closure safety and environmental monitoring and treatment, as and if required, will be conducted. A fifteen (15) year post-closure phase is estimated to be required based on the existing closure design and impacts assessment determinations described in the FEIS and addendums. This estimate is expected to be validated by the operations monitoring program results observed, and their comparison against residual effects predictions and environmental significance determinations. Where concerns in project tracking are identified, specific reclamation research programs may be developed to address uncertainties.

Upon initiation of Final Closure activities, a Short-Term Temporary Care and Maintenance phase would be implemented consistent with Section 7.1, as required, to facilitate final closure planning and logistics. It is expected this phase to last no longer than one (1) year for a planned closure scenario. As consistent with the activities outlined in Section 7.1, the Short-Term Temporary Care and Maintenance period prior to Final Closure activities would focus on maintaining a state of readiness of project components. Although activities would be consistent, the primary difference in a Short-Term Temporary Care and Maintenance period prior to Final Closure is activities would be performed to ensure project components are maintained in a state of readiness to support final closure activities rather maintained in a state of readiness with the intent of resuming operational activities in the future. The sub section below outlines the planned activities, including this Short-Term Temporary Care and Maintenance period, for Final Closure activities.

It should be noted that Baffinland also recognizes that Short-Term Temporary Care and Maintenance and Long-term Temporary Closure could occur during the construction or commissioning phases of the Project. The Project is being implemented in gradual phases and therefore not all components of the approved Project would be in place, or operational, should various economic drivers force the Company in Temporary Closure, Long-term Closure or Final Closure. Table 4.1 presents the current status of components related to the Project at the time of publishing.

The Phase 2 Proposal will involve an increase in the intensity of approved activities and an expansion of existing infrastructure. There are no new types of activities or infrastructure associated with the Phase 2 Proposal. Similarly, final reclamation activities will include more resources to implement the closure design, and no changes to the existing final closure schedule have been made at this time. As the project approaches the end of operations and the scope of work has refined to a level that more detailed logistical planning can be carried out, this schedule and work plan will be re-evaluated and updated. The current schedule is intended to show a rational sequencing and timeframe for closure activities, and actual dates

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 170 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

are subject to change based on various factors such as market conditions, exploration results, updated reclamation methods and changes to existing mine plan.

Select closure activities such as the removal of water crossings along the Tote Road and North Railway have been included in this schedule, but the closure approach may be modified based on input from communities regarding post-closure land use (e.g. some crossings left in place).

8.1 DURATION OF CLOSURE ACTIVITIES

The activities to achieve Baffinland's Site Abandonment Goal (Section 2.2.2) are undertaken with the intent of achieving component-specific closure criteria, as outlined in Table 5.1, in as short duration as practicable. For planned closure, once the decision has been made to permanently close the Project and the NWB and Land Owners have approved Baffinland's Final Closure Plan, it is anticipated that the major closure activities, as described in Section 8.2, will be completed between July and October over a period three (3) years. This period is preceded by a one year final closure planning period (Year 0) and proceeded by a fifteen (15) year post-closure monitoring period (Year 4 to 18), that will extend further depending on the timing of pit filling, which could take 80+ years, or as few as 2 if the pit is actively infilled.

In a planned closure scenario, final closure planning (Year 0) is anticipated to require 1 year. The reclamation program will be predominantly an earthworks exercise with a simple demolition contract and therefore a relatively simple engineering scope. This would indicate long durations for planning, design, procurement, and coordination are not required. In addition, based on the information developed and reviewed to date as part of this document, the level of information developed and discussed during the ongoing ASRs, and the expected content and review process for future ICRP revisions and the Final CRP, it is expected reclamation strategies would be developed in sufficient detail that the final closure planning period would be expedited and any required approval processes initiated well in advance. It is therefore reasonable to assume that excessive review, planning and revision of the reclamation scope and methodology would not be required and a year duration for a final closure planning period (Year 0) would be sufficient in a planned closure scenario. For the purpose of the ASR and unplanned closure, a two (2) year final closure planning period is assumed to be required. This is based on the assumption a 3rd Party would need additional time to go through a regulatory approval processes that, in a worst-case scenario, is not reasonably expected to be able to be completed in year or less.

The expectation of an active final closure and reclamation activity period of three (3) years is based on estimated duration and level of effort required for identified active closure activities⁸. Based on the ASR

⁸ Estimated duration and level of effort required for identified closure activities is described in 'Annual Security Review (ASR)' documentation required under Section 9.2 of the Commercial Lease, No. Q13C301, and under Part C and Schedule C of the NWB Type "A" Water Licence No. 2AMMRY1325.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 171 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

process, all active closure activities have a case-by-case person days associated with them to complete each task or sub-task. The summation of the total person days needed to complete the comprehensive list of active closure tasks expected to be required to meet closure objectives and criterion – including consideration of productivity factors and travel time – demonstrates it can be accommodated in three (3) year period assuming final closure and reclamation work is conducted only during the summer month period (mid-June to mid-September) with a total site-wide available camp space of no more than 100 beds.

The expectation of a fifteen (15) year post-closure monitoring period (Year 4 to 18) is based on findings from the Mary River FEIS that show no significant adverse residual effects are predicted for the VECs (Valued Ecosystem Component) or VSECs (Valued Socio-Economic Component) associated with the Project. The post-closure monitoring period is expected to be 5 (five) years of intensive monitoring, with less frequent monitoring being undertaken over the next ten (10) years as closure conditions reach equilibrium. As shown in the Mary River FEIS, the Project is not expected to compromise the ecosystemic integrity of the Nunavut Settlement Area. In addition, no significant adverse residual effects are predicated to occur to VSECs identified within the socio-economic environment, and the Project is expected to have significant positive effects for most of the VSECs as the Project reflects the priorities and policies of the Government of Nunavut as well as the aspirations of local communities, and is expected to enhance the future well-being of the residents and communities of the Nunavut Settlement Area and the rest of Canada. See Appendix H for further discussion on Predicted Residual Effects.

Based on this understanding, Baffinland is currently expecting fifteen (15) years Post Closure monitoring and reporting to be required to confirm the prediction that no significant adverse residual effects have been actualized by the Project. This duration in compliance with Section 12.3 of QIA Commercial Lease No.: Q13C301 and was selected as a reasonable time-frame to demonstrate closure activity effectiveness based on the information currently available. As the project progresses into Operations and ongoing monitoring results are developed (such as the rate of pit infilling), if information indicates that fifteen (15) years of post-closure monitoring is not a sufficient amount of time to determine closure activity effectiveness, or vice-versa, is overly conservative, this duration will be re-evaluated in consultation with the Land-Owner(s) and other stakeholders.

8.2 SUMMARY OF ACTIVITIES DURING FINAL CLOSURE BY YEAR

A high level schedule for planned Final Closure (by year) has been developed assuming productive use of resources performed in a logical manner with consideration given to unique challenges of working in the Arctic, such that reclamation can be accomplished in a timely fashion, in accordance with the ICRP and the regulatory framework established by the Inuit, Federal and Territorial governments. This schedule will be reviewed and revised to include additional and more detailed information as the final closure phase is approached. New information, when available, will be provided in subsequent revisions of the ICRP.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 172 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

The current high level Final Closure schedule (by year) for planned closure includes, is presented in Figure 8.1.

Final Closure Activities	Year																			
	-1	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
Notification of closure to land owners and NWB	*																			
Final closure preparation activities																				
Prioritization of decommissioning sequence, identification of equipment to remain on site for use during closure activities, and mobilization of contractors																				
Care and maintenance of site																				
Approval of final Closure Plan by NWB and land owners		*																		
Routine inspection and monitoring																				
Demobilization of on-site contractor equipment and material for shipment through Milne Port or Steensby Port																				
Transportation of excess fuel return from Mary River Mine Site to Milne Port and/or Steensby Port																				
Decommissioning and demobilization of Baffinland equipment identified for salvage																				
Decontamination and disposal of mobile equipment not suitable for salvage																				
Mobilization sealift of third-party contractor to either Milne Port or Steensby Port and demobilization sealift of current site contractors and Baffinland equipment and material to the Port of Valleyfield																				
Dismantling of facilities/buildings no longer required for mining and maintenance of trucking and transport equipment fleet																				
Decommissioning of open pit, mineral exploration areas, remote sites, and stockpiles																				
Development of Mine open pit overflow discharge channel																				
Pit flooding (if active flooding)																				
Systematic closure of remaining borrow bits and quarry sites (re-grading and contouring)																				
Decommissioning of Mary River Mine Site, Milne Port, and Steensby Port Camps																				
Decommissioning of fuel storage facilities																				
Waste management																				
Systematic removal of water crossings (culverts, bridges, abutments of concern) from the Milne Inlet Tote Road, followed by stablization of the road for final closure																				
Decommissioning removal of railway tracks, tracks, and ties; and systematic removal of culverts and bridges; followed by stablization of the Railway bed/service road for final closure																				
Treatment of contaminated soil in landfarms																				
Final site clean-up of Mary River Mine Site, including grading and contouring																				
Final site clean-up of Milne Port and Steensby Port, including grading and contouring																				
Application of soil cover to any permanent disposal areas																				
Demobilization sealift from Milne Port and Steensby Port to Valleyfield of third party equipment and residual reclamation equipment, material and supplies																				
Remaining bulk fuel demobilization sealift																				
Completion of all site contouring and drainage work																				
Construction of the Open Pit spillway																				
Closure and Post-Closure monitoring and reporting activities																				
Open Pit Enhanced Flooding																				
Completion of Waste Rock Cover																				
Site abandonment																				
Achivement of Final Closure objectives and criteria for all Project components																				*

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 173 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Figure 8.1 Schedule of Final Closure Activities

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 174 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Baffinland anticipates that all Project sites will be fully decommissioned and rehabilitated by the end of the third year of Final Closure based on level of effort estimates for direct closure activities. The Post-Closure monitoring and reporting activities to be conducted during this period are discussed in Section 9. Post-closure activities will be extended if closure criteria are not met in this timeframe.

By the end of Year 18, Baffinland expects that the Final Closure objectives and criteria for all project components will be achieved.

Maintenance to engineered structures during closure activities Years 1 to 3 will depend on results from operational monitoring. It is likely that a small level of effort will be required to maintain water and waste management structures until they are permanently closed. Maintenance is not anticipated beyond Year 4, and would be addressed only as needed.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 175 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

9 POST-CLOSURE SITE ASSESSMENT

This ICRP is considered to be a living document that will be updated regularly with additional detail incorporated from research and the results of monitoring plans as the Project evolves or approaches Final Closure.

The monitoring programs presented in the subsequent sub-sections are conceptual in nature at this stage of the Project life (initial phased operations). As the project advances a more detailed study design for assessing residual environmental impacts following completion of reclamation activities will be developed. This study will primarily consist of the post-closure inspection/monitoring programs described below, which are designed to assess the conditions at the site against the agreed upon closure objectives and criteria, as well as, site visits by the Designated Inuit Organization. Additional activities, such as human health and ecological risk assessments. As part of the Adaptive Management program these plans will be subject to annual reviews for plan effectiveness. Any relevant changes, updates or results related to closure will be integrated into the Interim Reclamation and Closure Plan. Details on the review for plan effectiveness are provided in Section 11.

Final Closure activities could result in substantial changes to the Project sites and therefore Baffinland expects the Final Closure and Reclamation Plan to include updated management plans based upon the knowledge gained through studies during the design, construction and operational phases of the Project, and consideration of the anticipated changes.

The following management plans, which include monitoring and reporting requirements, are expected to be updated to support closure and post-closure activities. As these plans are refined and increasing detail is available for closure designs, contingency procedures and/or corrective action levels will be added. The management plans include, but are not limited to:

- **Surface Water and Aquatic Ecosystems Management Plan:**
 - Updated to reflect re-contoured and natural drainage features re-established to pre-project condition, to the extent reasonably possible.
 - Consideration that sedimentation ponds will be breached and re-profiled.
 - As infrastructure is removed, amended to account for the site final configuration.
- **Fresh Water Supply, Sewage, and Wastewater Management Plan:**
 - Updated to reflect sewage and wastewater treatment plants will be decommissioned, dismantled and disposed of.
- **Waste Management Plan:**
 - Modified to account for disposal of equipment, material and waste resulting from demolition and dismantling of facilities considered.
- **Terrestrial Environment Mitigation and Monitoring Plan:**

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 176 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

- Modified to account for closure activities.
- Aquatic Effects Monitoring Plan:
 - As some infrastructure is removed, the AEMP will be amended to account for the site final configuration.
- Shipping and Marine Wildlife Management Plan
 - Modified to account for closure activities
- Air Quality and Noise Abatement Management Plan
 - Modified to account for the decommissioning of facilities

After the closure works, the site will not be considered closed out until assessments of the site conditions show that the closure objectives and criteria (Section 5.1.1) are met. Until those closure objective and criteria are met, monitoring of the site will continue in accordance with the project management plans, as applicable.

Monitoring the NIRB requirements, as required during planned closure, are dealt with in the implementation of current management plans that will be updated regularly throughout the life of the Project and through the monitoring and reporting programs shown below. These management plans will still be applicable during closure and, as necessary, post-closure monitoring. See Table 12.3 for concordance to NIRB Project Certificate requirements.

Based on current environmental effect predictions, post-closure monitoring is expected to be required over a fifteen (15) year period, although this time period may be revised, as necessary, as the monitoring programs are further developed to address additional information obtained over the Project lifecycle. Post-closure monitoring would be completed for a period of five (5) years, with a final monitoring assessment completed ten (10) years following.

Figure 9.1 represents the anticipated closure and post closure monitoring program schedule by closure/post-closure year. After closure activities are completed, the results from each monitoring and reporting program will be used to assess if prediction of no significant environmental or social effects are actualized.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 177 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Short-Term Temporary Care and Maintenance Program	SW									
Geotechnical/ Engineering Monitoring	SW	SW	SW	SW	SW	SW	SW	SW	SW	SW
Aquatic Monitoring and Reporting Program	SW	SW	SW	SW	MS	MS	MS	MS	MS	MS
Environmental Site Assessment	SW			SW						
Terrestrial Environment Monitoring and Reporting	SW	SW	SW	SW		SW		SW		
Marine Environment Monitoring and Reporting	MP	MP	MP	MP						
Safety Compliance Inspection ¹	SW	SW	SW	SW	SW	SW	SW	NTR, MS	NTR, MS	NTR, MS
Socio-economic Reporting	SW	SW	SW	SW	SW	SW	SW	SW	SW	SW
Air Quality Monitoring Program	SW	SW	SW	SW	SW					
	<i>Year 0</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Year 4</i>	<i>Year 5</i>	<i>Year 6</i>	<i>Year 7</i>	<i>Year 8</i>	<i>Year 18</i>
	C&M ²	Final Closure (3 yrs)			Post Closure (15 years)					

NOTES:

SW = Site Wide, MP =Milne Port; NTR = Northern Transportation Routes (Tote Road, North Railway); MS =Mine Site (including Open Pit and Waste Rock Stockpile)

1. Frequency will be established at the discretion of the Chief Inspector of Mines in consultation with Baffinland

2. Care and Maintenance Phase, up to one (1) year

3. Post Closure activities are expected to last fifteen (15) years but will be extended if closure criteria are not met in that timeframe

Figure 9.1 Anticipated Closure and Post Closure Monitoring & Reporting Program Schedule for Major Mine Areas

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 178 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

The following subsections provide outlines of monitoring programs proposed for closure and/or post-closure.

9.1 SHORT-TERM TEMPORARY CARE AND MAINTENANCE PROGRAM

As described in Section 7, the anticipated Short-Term Temporary Care and Maintenance program includes routine inspection, monitoring and reporting as required by Type 'A' Water Licence Amendment No. 1 2AM-MYR-1325 and its associated management plans. Please refer to Section 7 for more information. The Short-Term Temporary Care and Maintenance period is expected to last no longer than one (1) year for a planned closure scenario. The goal of the Short-Term Temporary Care and Maintenance period is to maintain required project facilities as necessary to support the upcoming active closure activities. As further definition of the Short-Term Temporary Care and Maintenance program is developed, it will be provided in future ICRP revisions and/or incorporated into the Closure and Post Closure Monitoring Plan submitted as part of the Final Closure and Reclamation Plan. If a Care and Maintenance monitoring schedule is required differing from Operations, it will be established in compliance with the AEMP and other appropriate management plans in consultation with applicable regulators and landowners.

Baffinland will continue to report on its activities in this Temporary Care and Maintenance period on an annual basis to the NIRB (as per Project Certificate No. 005 and its Amendment), AANDC Land Lease 47H/16-1-2, the NWB (as per Type A Water Licence 2AM-MYR-1325), and the Land Owners (as per Commercial Lease Q13C301). Through a Care and Maintenance monitoring program, regulatory compliance monitoring will continue to abide by all applicable project authorizations and adaptive management similar to that of Year 1 of Final Closure.

9.2 LONG-TERM MAINTENANCE

During care and maintenance and closure, facilities that are not yet decommissioned will need to be maintained until closure conditions are stabilized. All facilities are expected to be stabilized prior to demobilization of heavy equipment in Year 3. At this time, the only infrastructure that will require continued maintenance is the pit flooding equipment, which is anticipated to be completed between year 8 and year 15. The Open Pit spillway, which will be constructed during closure activities, will be designed and constructed to minimize maintenance requirements post-closure. The geotechnical monitoring (below) will identify the need for maintenance activities on all remaining engineered structures.

Other facilities such as the ore dock and sections of the Tote Road may be left in place following negotiations with QIA and would be left as is. Closure activities for these remaining structures will seek to limit residual liability in these areas, as agreed upon with QIA. Any other facility or structure left in place, such as the airstrip and open pit spillway, would only be left if there were no long-term maintenance required, or as agreed upon with QIA.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 179 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

9.3 REGULATORY REPORTING

Given the uncertain regulatory framework that will exist at the planned end of mining (2040), Baffinland has conservatively assumed that all existing regulatory and permitting reporting requirements from the operations phase will continue until the end of closure activities (Year 3). In post-closure, reporting associated with the monitoring programs discussed below is assumed to capture data collection and interpretation requirements for regulatory and permitting purposes as well as QIA and other public agency interests. In some cases, such as NWB and NIRB annual reports, a small level of additional effort may be required as a preamble to appended post-closure monitoring reports. If additional reporting scope is required by NWB and NIRB post-closure, it will be added to the existing monitoring/reporting to streamline reporting/review efforts when possible.

9.4 GEOTECHNICAL ENGINEERING MONITORING

Up until post-closure (following completion of the closure activities), Baffinland will report on all Geotechnical/Engineering Monitoring results on an annual basis to the NIRB (as per Project Certificate No. 005 and its Amendment), AANDC Land Lease 47H/16-1-2, the NWB (as per Type A Water Licence 2AM-MYR-1325) and the Land Owners (as per Commercial Lease Q13C301).

The objective of the geotechnical/engineering monitoring will be to confirm the long-term physical stability of the remaining engineered structures and disturbed areas on site, as indicated by closure objectives and criteria in Table 5.1.

Post-closure site assessment/geotechnical engineering monitoring will comprise both engineering analyses and post-construction performance monitoring of both permanent geotechnical structures and disturbed areas (where no permanent structure or significant landform structure will remain). Table 9.1 presents the proposed requirements for post-closure analyses and monitoring. The year prior to Final Closure Activities (Year 0), Baffinland will commission an inspection of the site and review of the design or as-built information (where available) for each of the permanent site features to confirm the scope of post-closure geotechnical assessments (analyses and monitoring). The scope and duration of monitoring and assessments required will be developed and confirmed based on operational performance results and available construction records. If features are no longer needed during mining, this assessment may be completed earlier in the mine's lifespan. Complete studies will be submitted to QIA for review with planned ICRP updates.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 180 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 9.1: Proposed Post-Closure Geotechnical Assessment and Monitoring Requirements

Mine Feature	Permanent Structure / Disturbed Area	Engineering consideration	As-built Assessment Completed	Monitoring	Analyses and monitoring
Milne Port					
Ore and Freight Docks	Permanent structure	Stability and erosion	Operations	X	
Port site drainage	Disturbed area	Erosion	Post-closure		X
Landfill	Permanent structure	Erosion	Post-closure		X
Tote Road and North Railway					
Former (removed) water crossings	Disturbed area	Erosion	Post-closure	X	
Remaining water crossing abutments	Permanent structure	Erosion	Post-closure		X
Road, rail embankment	Disturbed area	Erosion	Operations	X	
Cut and fill slopes	Permanent structure	Stability and erosion	Operations	X	
Mine Site					
Site drainage	Disturbed Area	Erosion	Post-closure	X	
Open pit	Permanent structure	Stability and erosion	Post-closure		X
Waste rock pile (s)	Permanent structure	Stability and erosion Permafrost Stability	Post-closure		X
Former stockpiles	Disturbed Area	Erosion	Post-closure	X	
Landfill site	Permanent structure	Erosion	Post-closure		X
Site Wide					
Site wide - other	Structure	Stability and erosion	Prior to mining	X	
			Operations	X	
	Disturbed area	Erosion	Prior to mining	X	
			Operations	X	
Abandoned quarry sites	Disturbed area	Stability and erosion	Operations	X	

Following the completion of closure works for each mine feature/area, a construction record will be prepared. Construction records will include:

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 181 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

- description of the works that were completed;
- description of deviations that were made from the design (where appropriate);
- stamped as-built drawings of the completed structure or landform (final grading);
- confirmation of what closure objectives have been met for this structure;
- laboratory results (where appropriate);
- a photolog; and
- confirmation of performance monitoring requirements.

9.4.1 GEOTECHNICAL ENGINEERING ANALYSES

Geotechnical engineering analyses will be required for all permanent structures (i.e. pit wall slopes, waste rock slopes, permafrost covers, port embankments, etc.). The requirements for analyses are as follows:

- Appropriately detailed construction records;
- Monitoring records indicate that the structure has been performing well;
- Slope stability, erosion protection analyses, or other evaluation of the structure to demonstrate long-term stability;
 - based on as-built records, or
 - based on the closure design where as-built conditions have been confirmed to be consistent with the design;
- Thermal analyses of the permafrost cover to demonstrate long-term post closure permafrost stability
- Meets closure criteria (Table 5.1).

These requirements may be found to have already been met for some structures that were constructed during, or prior to operations, provided the records listed above are available.

9.4.1.1 SLOPE STABILITY

Slope stability analyses will be used to confirm the long-term stability of permanent constructed structures on site, except for where analyses are deemed not to be required to confirm long-term stability by a NU engineer. Slope stability analyses may be modelled using industry standard software packages such as Geostudio, RocScience, or Plaxis. Slope stability assessments will include both static and pseudo-static (earthquake loading) conditions, and will provide an indication of the potential for liquefaction.

Open Pit

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 182 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Slope stability modelling of the open pit will be completed for both the transient flooding conditions as well as for long-term flooded conditions. Rock mass quality and strength characteristics will be collected during operations once pit development has begun and will be used to inform the assessment.

Under transient conditions, the pit will likely undergo worst case conditions when hydraulic back pressure on the walls from groundwater inflow is at its strongest. Once the pit has flooded, this backpressure will become counterbalanced with the pit lake water, which should improve the pit stability.

Waste Rock

The waste rock pile will be analyzed in consideration of permafrost aggradation. Monitoring of aggradation through operations will inform the stability assessment to confirm the thickness of the active layer that is to be incorporated in the model for the stability assessment.

Permafrost stability will be also modelled using Geostudio package or other appropriate software to ensure the long-term performance. The geothermal model will be established taking into account seasonality, climate change and heat generation within the waste rock.

9.4.1.2 EROSION PROTECTION AND DRAINAGE

Drainage features will be assessed for design runoff events. Peak discharges would be modelled using the rational method or by HEC-HMS and/or HEC-RAS for large catchments over 80 ha.

As no dams will remain on site, there is no anticipated requirement for conducting dam safety or evaluation programs. Decommissioning and breaching of dams will occur in accordance with all applicable regulations.

Revetment designs (shoreline protection) would be evaluated in accordance with the recommendations set out in the US Army Corps of Engineers (USACE) Shoreline Protection Manual.

Bridge abutments that are to remain within the Mary River will be assessed for erosion potential. Amongst the methods that could be employed to assess the stability of the riprap erosion protection include the Tractive Force Method.

A Final Grading Plan will be developed to outline reclamation activities and expectations for site conditions post-closure. It will be developed in consultation with local communities and in consideration of planned future land uses and environmental goals (e.g., minimizing wind erosion). The Final Grading Plan will address a variety of topics, and is expected to include information such as:

- Site drainage strategies and construction criteria
- Covering methods for foundations that are left in place
- Quarry reclamation, particularly in areas of permafrost disturbance

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 183 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

- Risk management using soil covers for any areas of impacted soil
- Covering landfills
- Regrading procedures at bermed and/or lined areas (e.g. landfarms)
- Grading of rock cuts and/or infill locations along Tote Road
- Grading options to promote desired wildlife and human travel
- Priority areas for scarifying to promote natural revegetation

The Final Grading Plan will describe the above information and provide the objectives that these activities will target.

9.4.2 GEOTECHNICAL MONITORING INSPECTIONS

Geotechnical inspections will be carried out at regular intervals following the completion of the closure works. Inspections will review the performance of structures relative to the closure objectives.

Site wide inspections of the condition of all site features are to be carried out the year following completion of closure activities (Year 4), as well as in Years 8 and 18.

The Open Pit should be inspected regularly during filling, and then 5 years following filling. For the purposes of devising a monitoring program, it is assumed that enhanced pit filling will take ten (10) years to complete. The final inspection would be completed in year 18.

As part of these inspections, site conditions are to be compared to the construction records, where available. During monitoring inspections, it is expected special attention will be given to the following areas:

1. Milne Port
 - a) Ore and freight docks – integrity of dock embankment and indication of shore erosion.
 - b) Port site drainage – indications of excessive erosion.
 - c) Landfill site status (indication of bank erosion, depression of cover material)
2. Tote Road
 - a) Abandoned quarry sites – site condition and advancement of re-vegetation.
 - b) Former water crossing – bank stability and indications of excessive stream bank erosion.
 - c) Road – bed erosion and progress of re-vegetation cover.
3. North Railway
 - a) Abandoned quarry sites – site condition and advancement of re-vegetation.
 - b) Former water crossings – bank stability and indications of excessive stream bank erosion.
 - c) Railbed – bed erosion and progress of re-vegetation cover.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 184 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

4. Mine Site

- a) Overall site drainage patterns and indication of erosion channels.
- b) Open pit water level and barriers to access.
- c) Open pit spillway
- d) Integrity of waste rock stockpile slopes (erosion, slumping of slopes).
- e) Landfill site status (indication of bank erosion, depression of cover material)
- f) Waste Rock temperature readings to ensure stability/permafrost aggradation
- g) Abandoned quarry sites – site condition and advancement of re-vegetation.

All geotechnical/engineering inspections and assessments will be carried out by licensed NU engineer.

9.4.3 ADDITIONAL SITE OBSERVATIONS

In addition to the detailed geotechnical/engineering monitoring inspections described above carried out by licensed NU engineer, as part of the Closure and Post-Closure Aquatic Monitoring and Reporting Program (Section 9.5), sampling personnel will be trained to identify and document any suspected cases of physical or geotechnical instability of lands and structures remaining on site (e.g., visible signs of cracking, any indication of seepage, indication erosion that has taken place, natural re-vegetation progress, slope ratios, etc.). Therefore, in the interim years between full geotechnical/engineering monitoring inspections, suspected cases of physical instability will be identified and documented for annual review by licensed NU engineer. If the licensed NU engineer deems it necessary in order to meet established closure criteria, an action plan will be developed and implemented as appropriate to correct the situation and ensure long-term physical stability of the project component or lands in question. The component or lands in question, and similar components or lands, will also then become an area of focus for the subsequent detailed geotechnical/engineering monitoring inspections carried out by licensed NU engineer to confirm acceptable corrective action.

9.5 CLOSURE AND POST-CLOSURE AQUATIC MONITORING AND REPORTING

The Closure and Post-Closure Aquatic Monitoring and Reporting Program focuses on detecting the discharge of potential contaminants from various Project components. During Final Closure, the Aquatic Monitoring and Reporting Program will be maintained as outlined by the AEMP (BAF-PH1-830-P16-0039), the SWAEMP (BAF-PH1-830-P16-0026), and in accordance with Type 'A' Water Licence 2AM-MRY1325. If the monitoring schedule is required to be revised from Operations, it will be established in compliance with the AEMP, SWAEMP, and other applicable management plans in consultation with applicable regulators and landowners. It is expected that any additional water quality/quantity monitoring programs developed to focus on specific areas of the Project site (e.g. tote road, quarries) will be rolled into a single plan for the post-closure phase. This includes Environmental Effects Monitoring required by MDMER (below), as well as the Core Receiving Environment Monitoring Program (CREMP). An important detail of this post-closure monitoring program will be the clear distinction of what closure criteria will apply to

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 185 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

which areas, such that an appropriate monitoring schedule is developed. For example, MDMER requirements will apply at the Open Pit and Waste Rock Stockpile, and in addition Water Licence effluent criteria, CCME PAL and/or risk-based criteria informed by baseline and operational water quality data will be considered for these and other areas of the site. Refinement of these criteria to numerical values, will occur in cooperation with QIA. In these other areas, post closure monitoring schedules will be informed by the large amount of performance monitoring results acquired throughout operations to allow a refined focus on the specific parameters/locations of concern.. It is expected that monitoring locations required for operations would act as a starting point, then the level of monitoring would decrease during care and maintenance and closure activities (Years 0-3) to reflect the end of mining and/or construction activities in certain areas and removal of “end of pipe” discharge locations, but would not be discontinued until an appropriate duration of post-reclamation monitoring has been at each area. In some areas, geotechnical inspection and monitoring will continue after water quality monitoring in order to identify unexpected erosion and sedimentation issues. If concerns are observed, water quality monitoring may be required. Monitoring at the Mine Site (i.e. Waste Rock Stockpile and Open Pit), which represent the largest environmental risk, will continue until Year 18. Current water quality monitoring locations are presented on Figures 9.1 and Figure 9.2 below. These locations will be updated to account for the Phase 2 Proposal as part of the upcoming NWB process.

As currently described in Section 5.2.1, the Open Pit will be filled by natural infilling and active pumping from local water sources (enhanced pit filling). Where possible, Baffinland would like to avoid unnecessary stresses to the nearby aquatic environment that may be associated with water extraction, while also avoiding a closure scenario that requires long-term active care. To achieve this, Baffinland has tentatively assumed a flooding period of 10 years would be achieved. Closure planning for this element will focus on refining estimates for active pumping from the likely water sources in combination with updated estimates for natural infilling based on new information regarding pit geometry, bulk rock hydraulic conductivity and site hydrological processes. In addition to water quality monitoring which will occur periodically throughout flooding, an additional 3 year monitoring period has been assumed to confirm closure criteria are met and the spillway is functioning as per design intent.

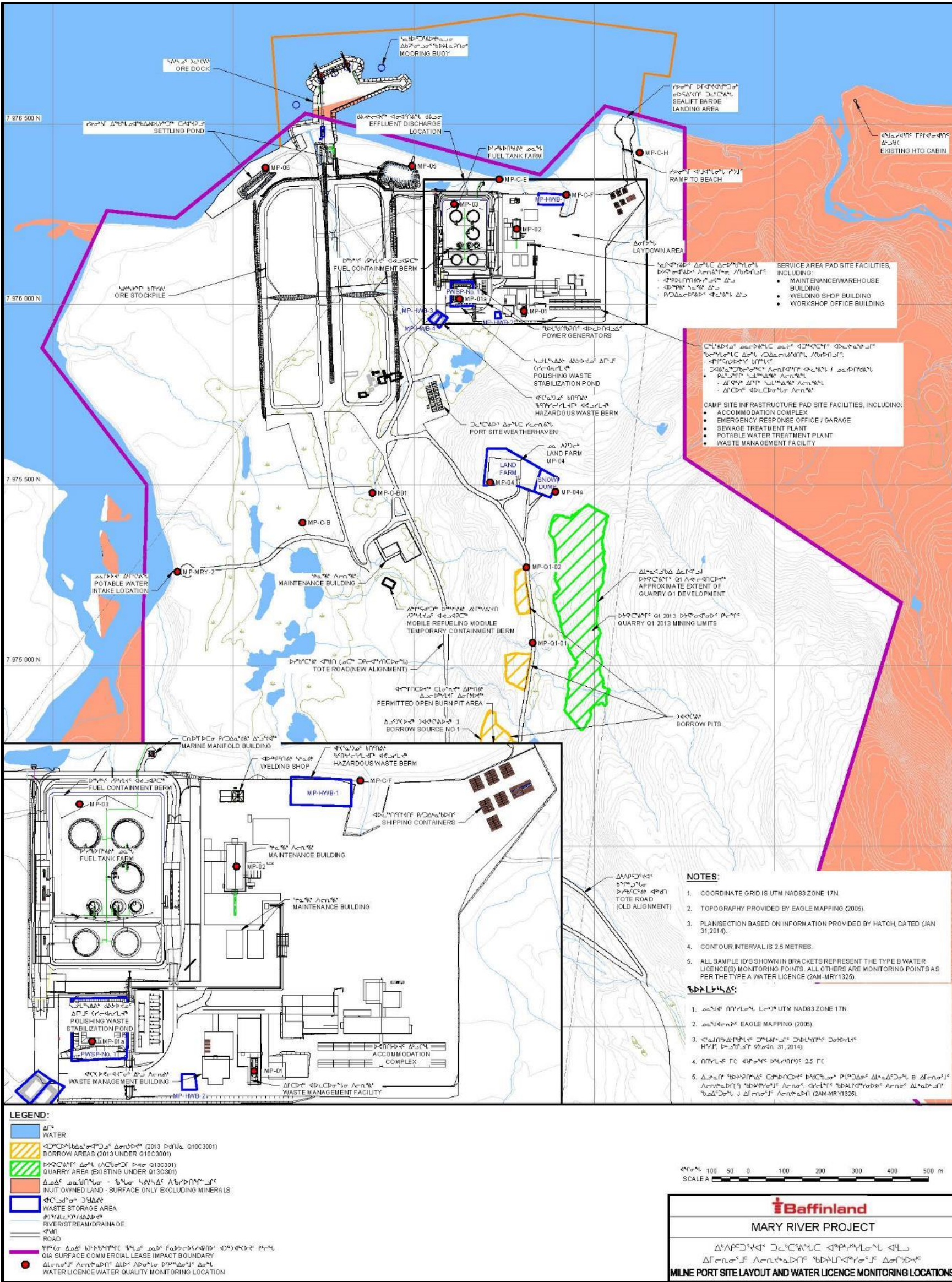


Figure 9.2 Milne Port Site Plan

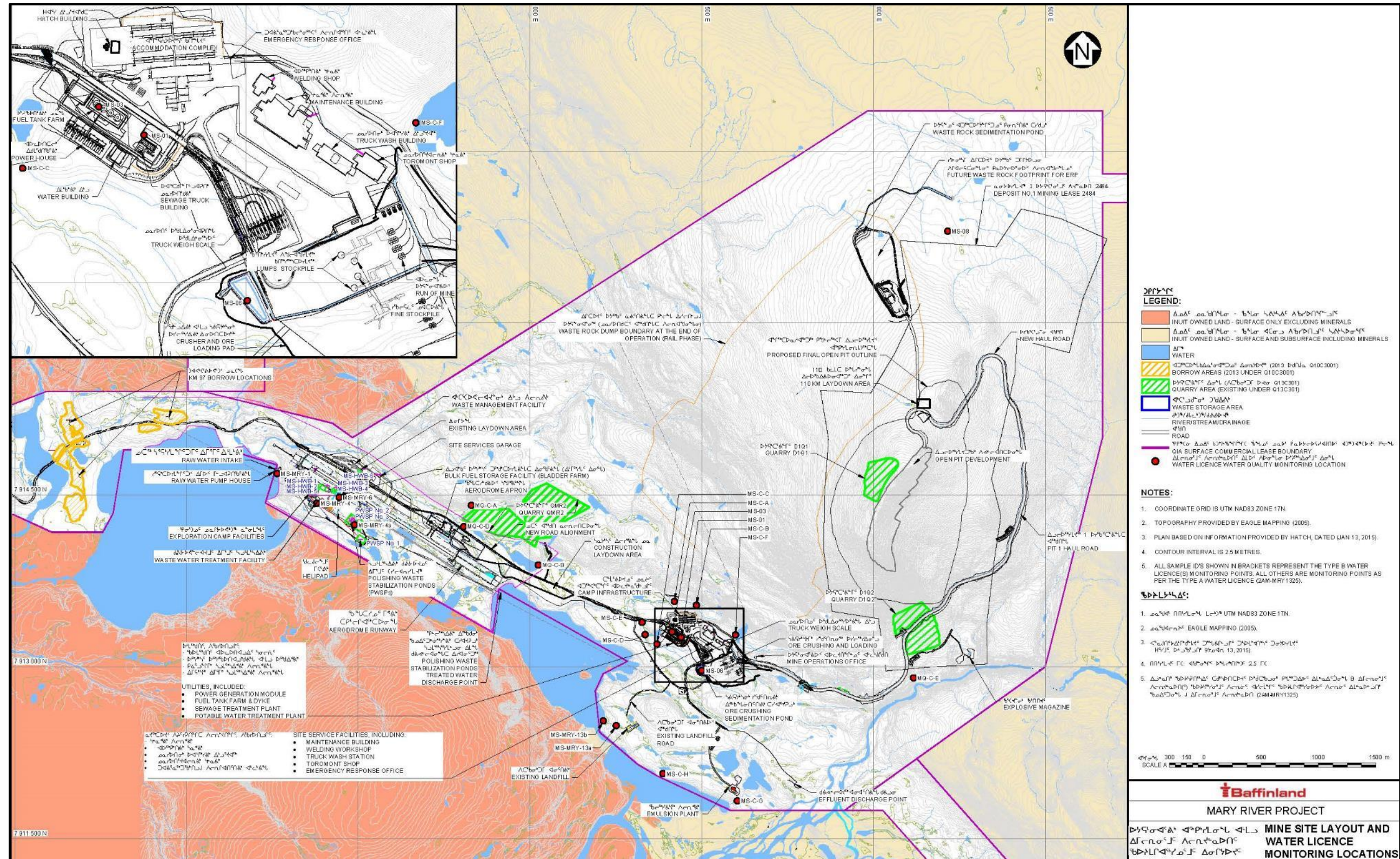


Figure 9.3 **Mary River Mine Site Plan**

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 188 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

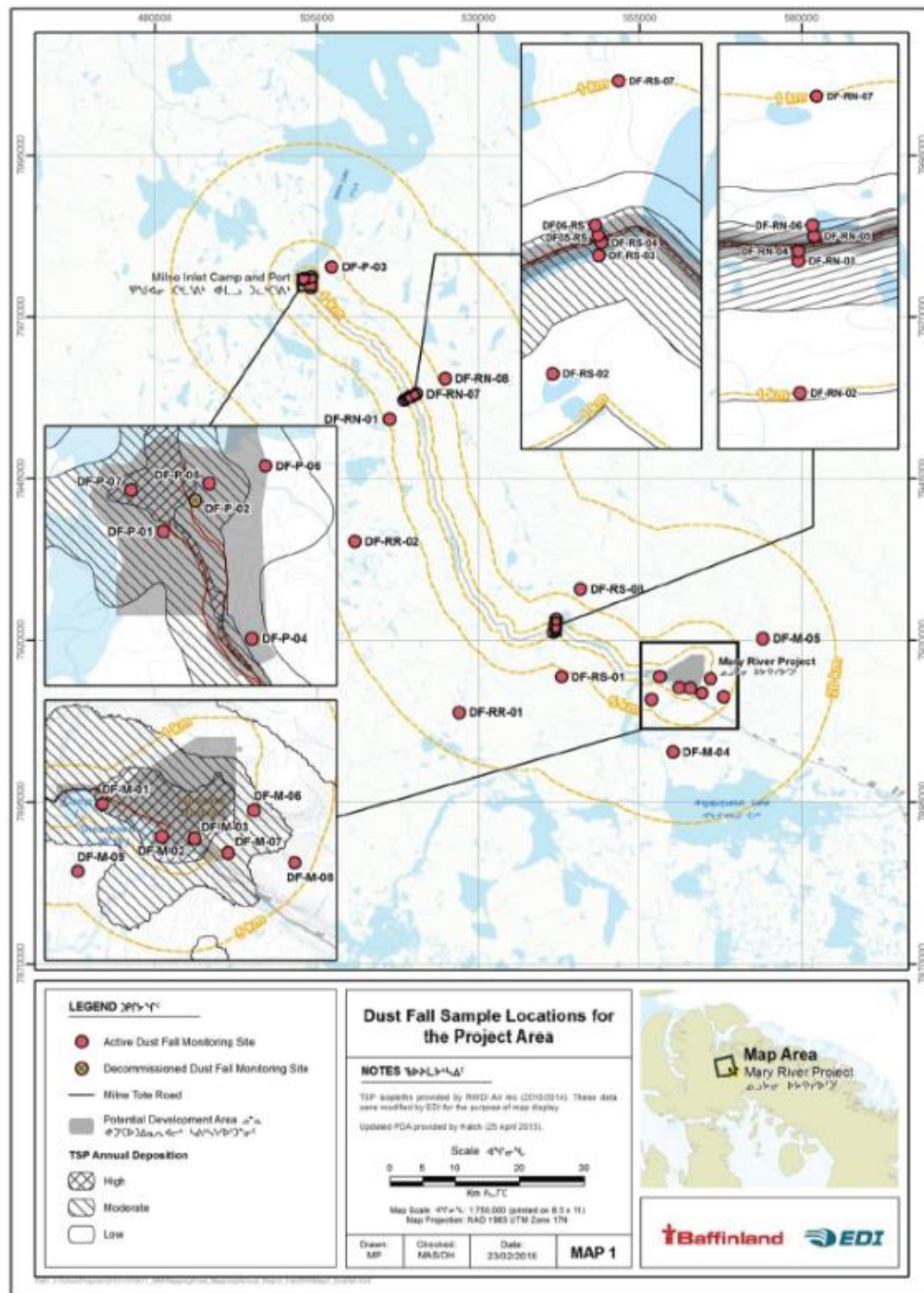


Figure 9.4 Dust Fall Sample Locations for the Project Area

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 189 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

It is expected that sampling of the revised, approved locations will take place up to three (3) time per year, during open water season. It is during these annual sampling events, that sampling personnel will identify and document any suspected cases of physical or geotechnical instability of lands and structures remaining on site as described in Section 9.4.

Aquatic monitoring at Post-Closure will be conducted in Years 4-6 at water crossings along the Northern Transportation Corridor to verify the closure criteria are met in these watercourses.

Baffinland will report on its Closure and Post-Closure Aquatic Monitoring and Reporting Program on an annual basis to the NIRB (as per Project Certificate No. 005 and its Amendment), the NWB (as per Type 'A' Water Licence 2AM-MYR-1325), AANDC Land Lease 47H/16-1-2, and the Land Owners (as per Commercial Lease Q13C301).

9.5.1 ENVIRONMENTAL EFFECTS MONITORING PROGRAM (EEM)

Mandated by the Metal and Diamond Mining Effluent Regulations, Schedule 5, the EEM Program focuses on determining if the discharge of mine contact water to the receiving environment will result in adverse environmental effects on the receiving streams and water bodies. This program will be carried out throughout mining, and as the locations of the mine contact water will not change after Final Closure (i.e., open pit water discharge, and, waste rock stockpile runoff discharge), it is expected the EEM component of the AEMP will remain relatively unchanged until Baffinland has achieved the "Recognized Closed Mine" status under Section 4 of the MDMER. Procedures for EEM monitoring are detailed in the existing AEMP including sampling locations, number of samples for each location, frequency of sampling and methods of interpretation.

Baffinland expects to conduct the EEM Program annually during Final Closure activities (Year 0 to 2) as required by the MDMER. This timeline would satisfy MDMER in order to achieve "Recognized Closed Mine" status, with the exception of the Open Pit. A modified EEM program would likely be designed through discussions with regulators to satisfy the delayed discharge via the Open Pit spillway, which built on the completed work at the Waste Rock Stockpile that can commence as soon as mining reaches 10% designed production capacity. Years 16-18 have been allocated conservatively to complete remaining EEM requirements for mine effluent at site.

Baffinland will report on any new EEM Program results on an annual basis to the NIRB (as per Project Certificate No. 005 and its Amendment), AANDC Land Lease 47H/16-1-2, the NWB (as per Type 'A' Water Licence 2AM-MYR-1325) and the Land Owners (as per Commercial Lease Q13C301).

9.5.2 CORE RECEIVING ENVIRONMENT MONITORING PROGRAM (CREMP)

The CREMP focuses on follow-up monitoring to validate predictions to aquatic valued ecosystem components (VECs) and key indicators. As a component study of the AEMP, the CREMP evaluates potential mine-related influences on water quality, sediment quality, and/or biota (including

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 190 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

phytoplankton, benthic invertebrates and/or fish) within aquatic environments near the Mine Site. Water and sediment quality monitoring programs, incorporating benchmarks derived from the Canadian Water Quality Guidelines for Protection of Freshwater Aquatic Life (CWQG-PAL), established by the Canadian Council of Ministers of the Environment (CCME), and baseline data, are performed on receiving aquatic environments near the Mine Site, including the Camp Lake, Sheardown Lake, Mary Lake Systems as well as Reference Lake 3 and various reference tributaries.

Baffinland expects to conduct the CREMP during care and maintenance (Year 0), as well as annually during Final Closure activities (Year 1 to 3) to assess whether component-specific closure criteria are met. Post Closure monitoring would then be conducted the first three years following completion of Final Closure activities (Years 4 to 6) and the Years 7, 8 and 18 at the Mine Site to confirm closure objectives are met

Baffinland will report on any new CREMP results on an annual basis to the NIRB (as per Project Certificate No. 005 and its Amendment).

9.5.3 LAKE SEDIMENTATION MONITORING PROGRAM

A Lake Sedimentation Monitoring Program is also performed annually under the AEMP and monitors dust and sediment deposition rates in Sheardown Lake NW to evaluate potential mine-related influences on biota (e.g. fish larvae hatching success). Annual monitoring reports for the Lake Sedimentation Monitoring Program further discuss the methods used and annual monitoring results and are provided as appendices to the Qikiqtani Inuit Association (QIA) and Nunavut Water Board (NWB) Annual Reports, required under Baffinland's Type A Water Licence and Commercial Lease with the QIA.

Baffinland expects to conduct the Lake Sedimentation Monitoring Program annually during Final Closure activities (Year 1 to 3) to assess whether component-specific closure criteria are met.

9.6 ENVIRONMENTAL SITE ASSESSMENT

An Environmental Site Assessment will be conducted at the onset of closure for areas that are expected to be contaminated with hydrocarbons or chemicals. Soil materials found to exceed the appropriate cleanup criteria for hydrocarbons (based on CCME contaminated sites guidelines or site-specific risk-based criteria) will be remediated onsite in the landfarm units, removed offsite to a licensed waste management facility, or the risk will be managed using site controls (e.g. covers).

The objective of the Environmental Site Assessments will be to determine areas of focus for final closure activities and to demonstrate conformance with CCME contaminated sites guidelines or site-specific risk-based criteria at the Mine Site, Milne Port, Tote Road and Steensby Port.

If not already done so, in the year prior to Final Closure activities (Year 0), Baffinland will commission a confirmatory sampling program at project sites to help determine adequacy of Final Closure activities' ability to meet closure criteria. Based on results, closure activities will be modified accordingly to ensure

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 191 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

closure objectives are met. The year following completion of closure activities (Year 4), a second Environmental Site Assessment of project sites will be conducted to confirm CCME contaminated sites guidelines or site-specific risk-based criteria have been met. If results indicate CCME contaminated sites guidelines or site-specific risk-based criteria have not been met, additional closure activities will be performed as necessary to ensure closure objectives are achieved.

If there is reason to suspect an area of soil has been contaminated by chemicals other than hydrocarbons (such as explosives), samples will be collected, and the soil will be tested. If the applicable regulatory requirements are exceeded, an appropriate method of disposal will be sought in consultation with the appropriate authorities.

Baffinland will report on any new Environmental Site Assessment and/or Human Health and Ecological Risk Assessment (HHERA) results on an annual basis to the NIRB (as per Project Certificate No. 005 and its Amendment), AANDC Land Lease 47H/16-1-2, the NWB (as per Type 'A' Water Licence 2AM-MYR-1325) and the Land Owners (as per Commercial Lease Q13C301).

9.7 TERRESTRIAL ENVIRONMENT MONITORING AND REPORTING

The Terrestrial Environment Monitoring and Reporting program will occur during temporary care and maintenance (Year 0), and during closure activities (Years 1-3). Terrestrial environment monitoring during closure includes vegetation monitoring (exotic invasive vegetation) and caribou movement monitoring. Other monitoring programs such as vegetation health, migratory bird, and caribou habitat monitoring will continue during active closure as well, but may be discontinued during post closure, based on monitoring results to date.

The objective of the Terrestrial Environment Monitoring and Reporting program will shift focuses slightly from the operational project phase to determine if Project areas encourage the desired re-growth of vegetation and wildlife movement upon completion of Final Closure activities. Given the long operational period, effects monitoring programs will diminish quickly in scope post-closure. As noted in Section 2.4, Baffinland intends to establish a Mine Closure Working Group (MCWG) and Baffinland expect the MCWG to help drive desired wildlife movement and passive re-vegetation considerations upon completion of Final Closure activities.

Baffinland expects to resume the Terrestrial Environment Monitoring and Reporting program the second year following completion of closure activities (Year 5) incorporating lesson learned from Operations. This schedule was determined to allow for a one (1) year wildlife/vegetation activity normalization period between active Final Closure activities and Post-Closure monitoring activities to help ensure an accurate representation of abandonment conditions. A follow up monitoring program is planned in Year 7.

The Terrestrial Environment Monitoring and Reporting program is expected to be a focused program that's main objective will be develop evidence of use or occupation of key indicator species in the avian

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 192 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

and terrestrial environment for the Project area (visual sighting of species, bones, antlers, tracks, and trails, etc.). It is expected to be conducted by a team of two (2) experts for no more than two (2) weeks accompanied by an associated Bear Monitor. Baffinland will evaluate the re-vegetation of rehabilitated areas and conduct an invasive species assessment. Results of the Terrestrial Environment Monitoring and Reporting period in Year 5 are anticipated to be confirmed using a similar, second period two (2) years after the first, in Year 7.

The Mary River Project FEIS assessed there to be negligible adverse residual effects post-closure to fauna and flora. Post-closure, the loss of vegetation will be reversed with natural re-vegetation and the residual effects on fauna species will gradually lessen with time as the project areas are naturally re-vegetated. The risk of invasive plant species colonizing the area is expected to be negligible, however, it will be monitored post-closure.

Baffinland will report on any new Terrestrial Environment Monitoring and Reporting program results on an annual basis to the NIRB (as per Project Certificate No. 005 and its Amendment), AANDC Land Lease 47H/16-1-2, the NWB (as per Type 'A' Water Licence 2AM-MYR-1325) and the Land Owners (as per Commercial Lease Q13C301).

9.8 MARINE ENVIRONMENT MONITORING AND REPORTING

Discharges to the marine environment will be captured under the Closure and Post-Closure Aquatic Monitoring and Reporting Program (Section 9.5).

The MEWG will be functioning during the life of the Project to continually evaluate if there are any residual effects from Project activities on the marine environment at the Port. Based on current information that suggest effects on marine mammals is related to ship interaction, it is anticipated that there will be no significant residual effects at closure on the marine environment when ship interaction is removed. As long as shipping activity is occurring during closure, marine monitoring and reporting in place during operation will continue, as outlined in the Shipping and Marine Wildlife Management Plan and Marine Environmental Effects Monitoring Plan at the time of closure. If operational monitoring indicates that the prediction of no significant residual effects at closure on the marine environment may be inaccurate, additional Post-Closure Marine Monitoring will be evaluated in the light of this new information.

9.9 SAFETY COMPLIANCE INSPECTION

The objective of the Safety Compliance Inspection will be to determine if project components are closed and reclaimed in compliance with the Northwest Territories (NT) and Nunavut (NU) *Mine Health and Safety Act* and Regulations, and the *Explosives Use Act* and Regulations. The Safety Compliance Inspection will be conducted by an Engineer/Inspector of Mines under the direction of the Chief Inspector of Mines working on behalf of the Workers' Safety and Compensation Commission (WSCC) of the Northwest

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 193 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Territories and Nunavut. Inspection frequency and scope will be established at the discretion of the Chief Inspector of Mines in consultation with Baffinland.

Baffinland will report on any Safety Compliance Inspection results on an annual basis to the NIRB (as per Project Certificate No. 005 and its Amendment), AANDC Land Lease 47H/16-1-2, the NWB (as per Type 'A' Water Licence 2AM-MYR-1325 and its Amendment) and the Land Owners (as per Commercial Lease Q13C301).

9.10 SOCIO-ECONOMIC REPORTING

As per condition 149 of the Project Certificate No. 005, Baffinland published a Closure Scenario Report in September 2014 and submitted it to the Nunavut Impact Review Board (NIRB). The report examines the potential socio-economic and cultural impacts closure may have on Inuit employees and analysis of the risk of temporary and permanent mine closure.

Socio-economic and monitoring during closure will be governed by the following legislative drivers and agreements:

- The *Nunavut Labour Standards Act*
- Human Resources Skills and Development Canada's (HRSDC) Employment Insurance Regulations
- The Nunavut Agreement on Labour Market Development
- Canada-Nunavut Labour Market Agreement
- Inuit Impact and Benefit Agreement between the Qikiqtani Inuit Association and Baffinland

In the event of permanent layoffs due to closure, under the Canada-Nunavut Agreement on Labour Market Development, Baffinland will engage with the Government of Nunavut to establish a Labour Market Partnership with the aim to develop and implement strategies for dealing with labour force adjustments. Under the Partnership Program a Joint Labour Adjustment Committee would be established to assist affected employees, a primary step being conducting a Needs Assessment to determine what labour adjustment issues have been addressed and determine appropriate programming required (e.g., job-search assistant, resume preparation, vocational counseling). Baffinland will also draw on the expertise of the Mining Industry Human Resources Council (MiHR) who has developed a Mining Workforce Transition Kit that may address the specific needs of employees and their communities.

Socio-economic reporting, as required by the Project Certificate and in accordance with articles of the Inuit Impacts and Benefits Agreement, will be reported on in the Annual Report to the Nunavut Impact Review Board and the Implementation Report for the IIBA for the life of the project.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 194 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

9.11 AIR QUALITY MONITORING AND REPORTING

During reclamation activities (e.g., construction/regrading), air quality monitoring and reporting will be consistent with operations, occurring across the entire site, as outlined in the Air Quality and Noise Abatement Management Plan. Air quality data will be collected via active TSP, SO₂, NO₂ sampling and passive sampling for dustfall, including metal deposition. As no one area of the mine will close substantially within the 3-year closure construction period, site-wide post-closure ambient air quality monitoring will be executed following closure. As all the major impacts are removed, only 1 year of post-closure monitoring is planned to confirm ambient levels of TSP, PM_{2.5}, SO₂ and NO₂ are within the closure criteria (NU standards).

Baffinland expects to continue this monitoring during the first year of post closure activities (Year 4). TSP and PM_{2.5} were selected as particulate matter poses health concerns due to their ability to be inhaled and accumulate in the respiratory system. Small particulate matter (e.g., PM_{2.5}) also has the ability to behave in the atmosphere like a gas and due to its small particle size, can disperse over greater distances than larger sized particulates before deposition.

Emissions of nitrogen oxides and sulphur oxides (i.e., NO_x and SO_x) are generated by fuel combustion in both stationary and mobile equipment. It should be noted there are negligible residual effects expected during post-closure as the primary sources of dust will no longer be in operation. During post-closure, stationary and mobile equipment will no longer be in use, with few exceptions such as truck traffic during monitoring programs. Accordingly, NO_x and SO_x emissions are expected to be negligible. However, to demonstrate that ambient conditions are below the criteria stated in the Environmental Guideline for Ambient Air Quality, Department of Environment, Government of Nunavut, October 2011 (200 µg/m³ 24 hr average for nitrogen dioxide and 150 µg/m³ 24 hr average for sulphur dioxide), a post-closure monitoring program consisting of up to five (5) sample locations using BAM-1020 or similar with a remote data logger for a period of not more than one (1) month during summer months is expected. Monitoring will be focused on locations identified through operational experience as having particulate emissions higher than other areas.

As indicated respectively by project component in Table 5.1, if Air Quality Monitoring program results demonstrate Mean TSP concentrations less than the risk-based criteria developed in consideration of the NU Ambient Air Quality Standard are met, the project component will be considered to have met the associated closure objectives. Dust deposition has been identified as a potential concern for the health of vegetation and wildlife, however, no residual effects of the Project on caribou health are anticipated due to metal exposure from dustfall. Most dustfall will be associated with the Mine Site and the primary metals are relatively innocuous to caribou (FEIS, Volume 6, Section 5.2.4). The potential effects of metals on plants either from aerial deposition or uptake from soils are highly dependent on site-specific conditions and the plant species themselves. Thresholds have not been developed for dust effects on plants, and the literature acknowledges a lack of data of effects of atmospheric emissions and its effects on Arctic

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 195 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

vegetation, leading to uncertainty in effects predictions. In an effort to further address this uncertainty, Baffinland is undertaking additional reclamation research on natural re-vegetation to better understand reclamation options. A dustfall monitoring program is being conducted to confirm project related activities will have a not significant effect on vegetation.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 196 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

10 FINANCIAL SECURITY

Closure and reclamation costs for the Mary River Project are determined under the Annual Security Review (ASR) process conducted in accordance with Schedule C of the Type “A” Water Licence Amendment No. 1 2AM-MRY1325 and Commercial Lease No. Q13C301. Under the ASR process, Baffinland, the respective landowners (QIA & the Crown), the NWB, and other interested parties confer to determine the estimated closure and reclamation costs for an upcoming year on an annual basis. This approach allows for Baffinland to post financial security in incremental adjustments prior to the commencement of work. Publicly available ASR document submissions for a respective year, describing in detail, annual estimated closure and reclamation costs, can be downloaded from the NWB FTP site at: <ftp.nwb-oen.ca>.

10.1 PRELIMINARY MINE CLOSURE AND RECLAMATION PLAN ESTIMATE AND UPDATES

Prior to commencement of the ASR process, which is the current overriding process to determine Project closure and reclamation costs, Baffinland’s estimated closure and reclamation costs were established and outlined in the Preliminary Mine Closure and Reclamation Plan (Rev D, H337697-0000-07-126-0014) which was submitted as part of the Mary River Project FEIS (FEIS Appendix 10G). Estimated costs and assumptions were made based on project design and costs available at the time of development using the Mining RECLAIM spreadsheet provided by Aboriginal Affairs and Northern Development Canada (AANDC).

An addendum to the PCRP Closure and Reclamation Cost Estimate was developed to support the Type ‘A’ Water License 2AM-MRY1325 amendment process for 2015. This addendum was made using current and updated estimated closure and reclamation costs, established through the ASR process, for Milne Port and the Tote Road aggregated with estimated closure and reclamation costs for Mary River Mine Site, the Railway and Steensby Port that were presented in Baffinland’s original submission of the PCRP in February 2012. The purpose of this addendum was to incorporate consideration of Baffinland’s ERP to support the Type “A” Water License 2AM-MRY1325 amendment process. Details of the results of this process can be found in the following document: *Final Environmental Impact Statement (FEIS) Closure and Reclamation – Financial Security Estimate Addendum, H349001-0000-07-220-0001*.

Baffinland notes that the *Final Environmental Impact Statement (FEIS) Closure and Reclamation – Financial Security Estimate Addendum, H349001-0000-07-220-0001* does not override the ASR process and the ASR is still the governing process to determine reclamation financial security.

The Ultimate Project closure and reclamation cost estimate completed in 2015 totaled \$518,711,208. The break down between land and water liability and IOL/Crown Land is presented in Table 10.1.

Table 10.1: Total Cost and Breakdown for Mary River Project Closure and Reclamation

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 197 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

	Total Cost	Percentage	Land Liability	Water Liability
Inuit Owned Land	\$411,234,800	79.2	\$405,430,454	\$6,106,421
Federal Owned Land	\$107,476,408	20.7	\$105,391,574	\$2,160,637
Total	\$518,711,208	100	\$510,822,029	\$8,267,058

10.2 PHASE 2 PROPOSAL

In accordance with Part C of the Water Licence (2AM-MRY1325), Baffinland will continue to update the security requirements for the Project annually, with necessary adjustments accounted for in the results of the Annual Security Review process.

An estimate of the marginal increase in security associated with the Phase 2 Proposal was prepared in order to update the overall cost estimate for the Project (Appendix I). The Phase 2 Estimate follows established assumptions from previous years, and is intended to be inclusive of all closure and reclamation costs estimated to be required for a 3rd Party Contractor to perform the work in a ‘worst-case’ scenario for all disturbed areas, project components and project activities existing on the Mary River Project site upon conclusion of the Phase 2 proposal.

Table 10.2 below presents the ‘global’ closure and reclamation security estimated to be required (Column E) based on the most recent 2019 ASR Estimate (Column C) and the Phase 2 Estimate (Column D).

Discussions between Baffinland and land owners are ongoing to reach agreement regarding the global estimate assumption and calculations. An updated closure and reclamation security estimate for all aspects of the Phase 2 Proposal will be completed following the regulatory process on a timeline to be determined by Baffinland and QIA.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 198 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 10.2 Mary River Project 'Global' Closure and Reclamation Security Summary – Phase 2 Estimate

	A	B	C	D	E
	Authorization	Liability	Global Estimate from 2019 ASR (\$)	Phase 2 Estimate Marginal (\$)	Total 'Global' Estimated Security for Phase 2 Above Current Estimate (\$)
					C + D = E
1	Type A 2AM-MRY1325	IOL ²	96,438,000	43,839,000	140,277,000
2		Crown	1,802,000	15,262,000	17,064,000
3		Water	1,387,000	1,424,000	2,811,000
4		Land	96,853,000	56,677,000	153,530,000
5	<i>Subtotal Type A</i>		<i>98,240,000</i>	<i>58,101,000</i>	<i>156,341,000</i>
6	Type B Exploration2BE-MRY1421 ³	IOL	165,000	-	165,000
7		Crown	1,082,000	-	1,082,000
8		Water	18,000	-	18,000
9		Land	1,229,000	-	1,229,000
10	<i>Subtotal Type B Exploration</i>		<i>1,247,000</i>		<i>1,247,000</i>
11	DFO Security Associated with Ore Dock	IOL ²	-	-	-
12		Crown	563,000	-	563,000
13		Water	563,000	-	563,000
14		Land	-	-	-
15	<i>Subtotal DFO</i>		<i>563,000</i>		<i>563,000</i>
16	AANDC Land Lease 47H/16-1-2 ⁴	IOL ²	-	-	-
17		Crown	4,975,000	-	4,975,000
18		Water	-	-	-
19		Land	4,975,000	-	4,975,000
20	<i>Subtotal AANDC Land Lease</i>		<i>4,975,000</i>	-	<i>4,975,000</i>
21	GRAND TOTAL		105,025,000		163,126,000

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 199 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

11 REVIEW OF PLAN EFFECTIVENESS

An important element of Baffinland's management system is reviewing the continued suitability, adequacy and effectiveness of each management plan. This will occur through an annual review process as well as scheduled updates to the ICRP.

11.1.1 ANNUAL REVIEW OF COMPLIANCE AND UNANTICIPATED EFFECTS

Baffinland conducts internal inspections and audits throughout the year, and immediate corrective actions are taken as appropriate to address instances of non-compliance, as well as unanticipated effects observed. Follow-up corrective actions may also be required. These immediate and follow-up corrective actions are documented in the annual report.

One follow-up corrective action may be to revise mitigation measures or monitoring programs described in the applicable management plans. During the annual reporting cycle, Baffinland staff will review instances of non-compliance as well as unanticipated effects and determine if a review of plan effectiveness is appropriate. Should there be a significant unanticipated effect, determined by the Inuit Committee and/or community observations, a review of plan effectiveness will be completed. This process is articulated on Figure 11.1.

Part of this annual review cycle is the incorporation of IQ, which may include feedback from the Inuit Committee and/or community observations. This process may occur annually whether repeat non-compliance and/or unanticipated effects are identified (Figure 11.1).

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 200 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

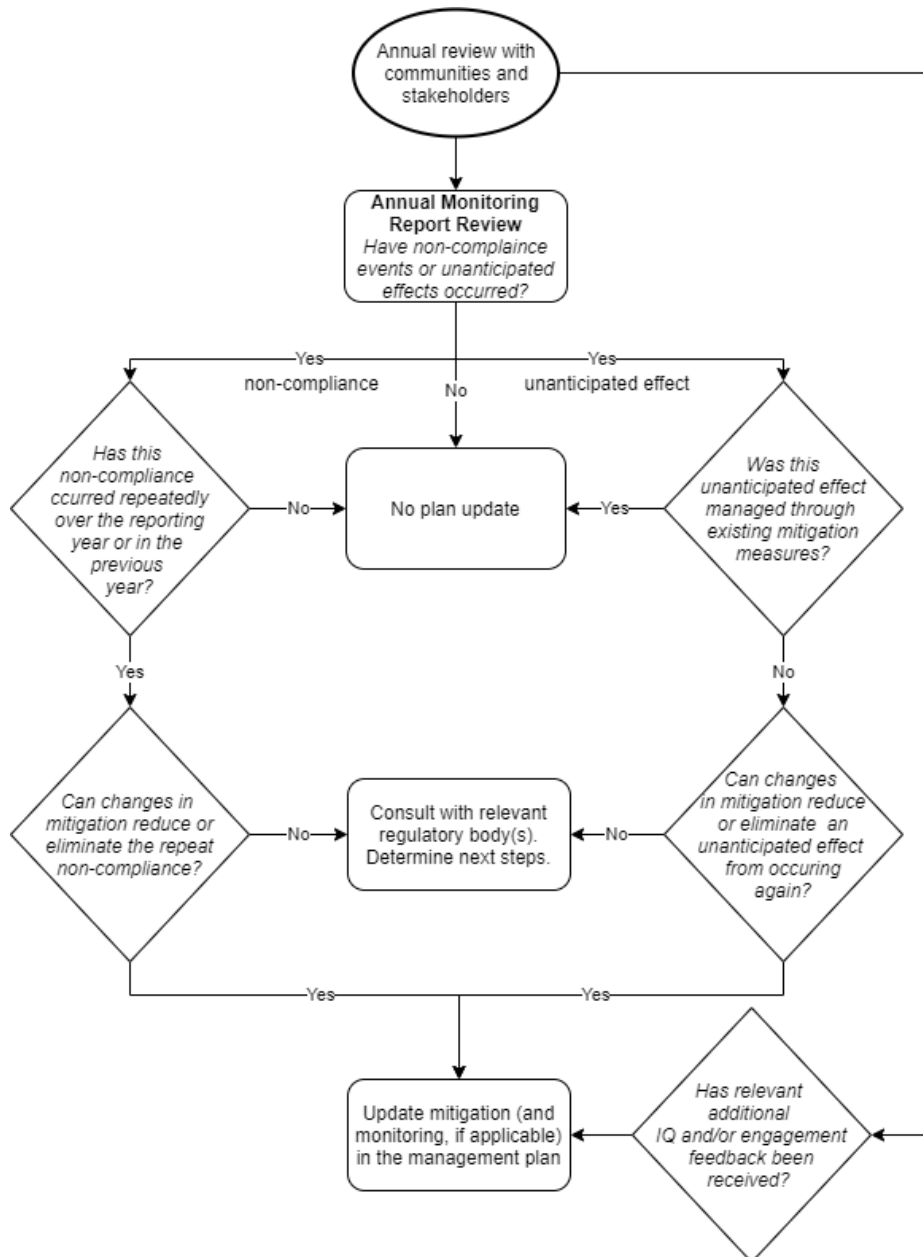


Figure 11.1 Annual Review of Plan Effectiveness

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 201 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

11.1.2 SCHEDULED UPDATES

In addition to the annual review cycle described above, scheduled Plan reviews will occur, at a minimum, according to the schedule presented in Table 11.1.

Table 11.1: **PLAN REVIEW SCHEDULE**

Review Event	Description
Prior to construction ¹	Incorporate any additional requirements specified in the Amended Water Licence
Post-construction	Mandatory management review
Every 5 years during operation	Mandatory management review

NOTE:

1. This is a generic term that applies to Project expansions or other major sustaining capital works.

In addition to the scheduled updates presented in Table 11.1, Plan updates may be required based on feedback from the MCWG, QSEMC and/or results of the annual review process. It is acknowledged that any significant changes to the closure plan require discussion with the MCGW, and are subject to final approval by the QIA

Plan updates will be recorded in the Document Revision Record located at the front of the Plan. Each plan update will be provided to the QIA for review and approval before being finalized for implementation.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 202 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

12 CONCORDANCE TABLES

Table 12.1 has been prepared to demonstrate conformity of the ICRP with the MVLWB/AANDC, Guidelines for the Closure and Reclamation of Advanced Mineral Exploration and Mine Sites in the Northwest Territories, November 2013. The concordance table and ICRP have been structured to be consistent with the 'template' provided in pages 31 to 42 of the Guidelines.

Table 12.1: Conformity Assessment of the CIRNAC Guidelines to the ICRP

CIRNAC Guideline	ICRP Section
1.0 Plain Language Summary i. Plain language summary of CRP, with key aspects of current plan, major uncertainties and how they will be addressed, and differences from previous plans	Section 1
2.0 Introduction i. Purpose and scope of the closure and reclamation plan as it relates to Boards' requirements, previous versions of CRP, expectation of stakeholders. Approval dates of previous CRPs	Section 2.1
ii. General project description, description of proponents, spatial and temporal extent of project	Section 2.1
iii. Status of plan (e.g. interim CRP, final CRP, etc.)	Section 2.3.1
iv. Goal of the closure and reclamation plan.	Section 2.2
v. Identify closure and reclamation planning team. Describe, list or show important internal/external organizational relationships and specific responsibilities that facilitate/manage closure and reclamation	Section 2.3
vi. Outline approach to engagement, how they have or will integrate local community values into the CRP, strategies for engaging communities in CRP development and implementation	Section 2.4
vii. Identify relevant regulatory authority and existing/required permits, authorizations, agreements related	Section 2.6
viii. Conformance table showing where CRP satisfies applicable licences/permits. List of additional standards/guidelines to be followed	Section 11
3.0 Project Environment i. Overview of pre-disturbance atmospheric environment (e.g. climate, temperature, precipitation, air quality), including maps, tables, figures	Section 3.1
ii. Overview of pre-disturbance physical (terrestrial) environment (e.g. physiography, geology, permafrost, geological hazards, hydrogeology), including maps, tables, figures	Section 3.2
iii. Overview of pre-disturbance chemical environment (e.g. soil/sediment chemistry, surface water/groundwater quality, ARD and metal leaching potential), including maps, tables, figures	Section 3.2
iv. Overview of pre-disturbance biological environment (e.g. vegetation, aquatic life, terrestrial wildlife, avifauna, overall ecosystem), including maps, tables, figures	Section 3.3.3
4.0 Project Information i. Site location, regional and local context of affected areas, access points and methods of access, including maps and photos	Section 4.1
ii. History of ore discovery, exploration, previous development and operations, ownership changes, summary of application, permitting, and licencing process to date	Section 4.2
iii. Description of site geology, mining resource, extraction methods and rational for footprint and specific target areas, including maps, figures, tables	Section 4.3

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 203 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

CIRNAC Guideline	ICRP Section
iv. Project summary, including life of mine plan through closure and reclamation and various options proposed from EA	Section 4.4
v. List of all project components	Table 4.1
5.0 Permanent Closure and Reclamation	Section 5.1
i. Definition of permanent closure and reclamation	Section 5.1.1
ii. Indicate components that may require passive long-term care and expected timelines for relinquishment	Section 5.1.1
iii. Description of project components, including details (e.g. dimensions, footprint, relative locations on map), lifespan and current status, with supporting maps, figures, photos.	Section 5.2 (Sections 5.2.X.1)
iv. Description of pre-development, existing, and projected final site conditions using maps, photos, figures as appropriate. Illustrate relevant water bodies, topographic modifications, and vegetation changes. Identify important/unique environmental conditions with bearing on closure.	Section 5.2 (Sections 5.2.X.2)
v. List of closure objectives and criteria for each component, with any uncertainties noted with reference to the associated reclamation research plan	Table 5.1
vi. Alternatives analysis of various closure options with clear demonstration of pros and cons, risk scenarios and unique/novel closure situations for the specific component.	Section 5.2 (Sections 5.2.X.4)
vii. Selection of preferred closure activity with rationale for selection/rejection of others	Section 5.2 (Sections 5.2.X.4)
viii. Description of engineering work (e.g. demolition, construction) necessary for selected closure activity, with supporting information for proposed work to prove proposed technology or engineering will be successful	Section 5.2 (Sections 5.2.X.5)
ix. Assessment of potential negative residual effects remaining after completion of reclamation. Provide results of risk assessments and discuss how any predicted residual effects compare to stakeholders' preferences and or to company's commitments made during EA.	Appendix G
x. Identify uncertainties associated with the risks of various closure options and how to select the best closure activity, how to best implement a selected closure activity, how to define closure criteria, how Traditional Knowledge will inform closure planning and more. Include how each uncertainty will be addressed (reclamation research, engineering study plan, etc.).	Section 5.2 (Sections 5.2.X.7)
xi. Description of what post closure monitoring will occur (e.g. fugitive dust, stream flow, wildlife and aquatic life movement etc.) and why, including sampling locations, frequencies, duration, maintenance activities, methods of reporting	Section 5.2 (Sections 5.2.X.8), Section 9
xii. List of possible contingencies should closure activity not be successful in meeting closure criteria and objectives, with identification of preferred contingency with rationale	Section 5.2 (Sections 5.2.X.9)
6.0 Progressive Reclamation	Section 6.1
i. Definition of progressive reclamation	Section 6.1
ii. Opportunities for progressive reclamation during life of the project, including location, aerial extent of work, description of planned reclamation activities and any planned/required monitoring	Section 6.2
iii. Summary and location of completed progressive reclamation activities, including a list of reports detailing any reclamation that has occurred, and any lessons learned that will inform closure planning	Section 6.3
7.0 Temporary Closure	Section 7.1 and 0
i. Closure goal and closure objective of temporary closure	Section 7.1 and 0

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 204 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

CIRNAC Guideline	ICRP Section
ii. Selected temporary closure activities for each project component (must include minimum activities identified by MVLWB guidelines)	Section 7.1 and 0
iii. Monitoring activities during temporary closure	Section 7.2 and 7.4
iv. Contingencies for unforeseen events/conditions during temporary closure if response different from normal operations, including effects on any monitoring activities and plans to address any effects	Section 5.2 (Sections 5.2.X.9)
v. Temporary closure schedule, including anticipated timing/sequence of events, description of temporary closure activities for each component, duration and approximate end date of closure period	Section 7.1 and 0
8.0 Integrated Schedule of Activities	
i. Component-specific schedule depicting operations, closure dates, and expected start and end times for selected closure activities, including progressive reclamation, initiation and completion of research, timeframes for meeting closure criteria and monitoring and reporting phases	Section 8
ii. Description of schedule uncertainties	Section 8
9.0 Post-Closure Site Assessment	Section 9, See also Appendix G
i. Description/study design of post-closure impact assessment	
10.0 Financial Security	Section 10
i. Estimates of total liability of permanent closure (including post-closure monitoring programs and activities)	
ii. Cost breakdown for each project component	Section 1.1.1 and ASR documentation
iii. Match estimate with timing of closure and reclamation activities	Section 1.1.1 and ASR documentation
11.0 References	
i. List of documents/reports that support characterization of baseline environmental data, geochemical analyses and predicted ML/ARD potential, and relevant engineering work related to support the CRP	Section 14
Appendix A – Glossary of Terms and Definitions	
i. Plain language explanation of discipline specific technical terms and key closure and reclamation planning terms	Section 13.1
Appendix B – List of Acronyms, Abbreviations, Units, and Symbols	Section 13.2
Appendix C – Record of Engagement	
i. Table outlining all completed engagement specific to closure, including issues identified by engaged parties and how company has addressed them	Appendix E
Appendix D – Lessons Learned from Other Projects	
i. Summary table of relevant on-site closure issues/concerns dealt with at other projects, the completed activity, lessons learned and application to managing project closure and reclamation	Appendix F
Appendix E – Reclamation Research Plans	
i. Reclamation research plans required to address uncertainties. Plans should describe the uncertainty, research/study objective, overview of tasks, linkages to other research/studies, project research schedule, costs and references.	Appendix D

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 205 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 12.2 has been prepared to characterize the content of the ICRP and updated with reference to this ICRP. The concordance table is consistent with the principles of the Qikiqtani Inuit Association (QIA) Abandonment and Reclamation Policy for Inuit Owned Lands ('the Policy') and structured in accordance with Appendix C of the QIA Security Policy (v3).

Table 12.2: QIA Abandonment and Reclamation Policy for Inuit Owned Lands Concordance Table

Item	QIA Abandonment and Reclamation Policy for Inuit Owned Lands (v3)	Baffinland Response
1	Have all reports and plans including addendums and responses been submitted?	Yes
2	Are the submitted reports and plans executable standalone documents with adequate rationale and detail?	Yes
3	Do all reports and plans contain appropriate referencing (document name, author, section, and page number) to all supporting information?	Yes
4	Do the reports and plans demonstrate a firm understanding, of QIA's <i>Guiding Principles on Reclamation</i> and provide rationale on how these principles have been satisfied?	Yes
5	Has IQ and consultation with Community Land and Resources Committee(s) been applied? Has the Tenant provided detailed community consultation records?	Closure and reclamation issues discussed at hearings related to the Project Certificate. Commitment to Mine Closure Working Group in the future to incorporate community input and IQ.
6	Are all the components that are considered in the abandonment and reclamation plan listed?	Yes
7	Does each component of the Project have an abandonment and reclamation objectives and criteria?	Yes
8	Has an A&R plan been provided with a financial security estimate?	Yes. Financial security estimate is conducted in accordance to Section 9.2 of Commercial Lease, No. Q13C301
9	Have Table 1, 2, 3 and 4 of Appendix B been used in completing the financial security estimate?	Yes – was adapted to suit project specific requirements.
10	Has evidence been provided to support the Policy assumptions for all reports and plans?	Yes

Table 12.3 has been prepared to show all the Project Certificate No. 005 commitments outlined in Appendix A of the Project Certificate that apply to this ICRP. Where the Project Certificate Terms and

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 206 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Conditions have requirements for Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post Closure Monitoring the requirements are dealt with by a current Management Plan that will be updated regularly throughout the life of the Project. These Management Plans will still be applicable during Closure and, as necessary, Post Closure Monitoring, however an initial post closure monitoring program has been outlined in this document to tie residual effects and proposed Post Closure Monitoring.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 207 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 12.3: NIRB Project Certificate Term and Conditions Concordance Table

Ref #	Category	Objective	Project Condition/Type A Water Licence Condition	Related VEC	Associated Closure/Post-Closure Monitoring Program	IOL/Crown land	ICRP Ref
2	Meteorology and Climate – Climate Change Validation and Studies	To provide feedback on the impacts that climate change might be having on the Project.	The Proponent shall provide the results of any new or revised assessments and studies done to validate and update climate change impact predictions for the Project and the effects of the Project on climate change in the Local Study Area and Regional Study Area as defined in the Proponent's Final Environmental Impact Statement.	1 – Climate Change	None planned at this time however any research conducted during Closure and Post-Closure Phases will be provided during Annual Reporting.	Both	Section 9.11
3	Meteorology and Climate – Green House Gas Emissions	To confirm that the Proponent is exploring and implementing concrete steps to reduce greenhouse gases.	The Proponent shall provide interested parties with evidence of continued initiatives undertaken to reduce greenhouse gas emissions.	1 – Climate Change	Air Quality Monitoring Program. Results of Closure Phase Air Quality Monitoring Program and any other initiatives taken to reduce greenhouse gas emissions during Closure and Post-Closure Phases will be provided during Annual Reporting.	Both	Section 9.11
4	Climate Change – Consultation on Climate	To promote public awareness and engagement of affected groups.	The Proponent shall endeavor to include the participation of Inuit from affected communities and other communities in Nunavut when undertaking climate-change related studies and research.	1 – Climate Change	Air Quality Monitoring Program Mine Closure Working Group	Both	Section 9.11 Section 2.4
5	Meteorology and Climate – Weather Monitoring Data	To provide families of employees with up to date information.	The Proponent shall endeavour to explore and implement reasonable measures to ensure that weather-related information for the various Project sites is readily accessible to the public on a continual basis throughout the life of the Project.	2 – Air Quality	Air Quality Monitoring Program. Results of Closure Phase Air Quality Monitoring Program will be provided during Annual Reporting	Both	Section 9.11

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 208 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 12.3: NIRB Project Certificate Term and Conditions Concordance Table

Ref #	Category	Objective	Project Condition/Type A Water Licence Condition	Related VEC	Associated Closure/Post-Closure Monitoring Program	IOL/Crown land	ICRP Ref
6	Meteorology and Climate – Emissions	To provide feedback on the Project's emissions.	The Proponent shall provide the results of any emissions calculations conducted to determine the level of sulphur dioxide (SO ₂) emissions, nitrogen oxide (NOX) emissions and greenhouse gases generated by the Project using fuel consumption or other relevant criteria as a basis.	2 – Air Quality	Air Quality Monitoring Program	Both	Section 9.11
11	Air Quality – Incineration Management Plan	To mitigate impacts to air quality from incineration activities.	The Proponent shall develop and implement an Incineration Management Plan that takes into consideration the recommendations provided in Environment Canada's Technical Document for Batch Waste Incineration (2010).	2 – Air Quality	Waste Management Plan (carried over from Operations) will apply when incinerators in operation	Both	Section 5.2.7
14	Noise and Vibration – Noise and Vibration Monitoring	To mitigate noise and vibration at Project sites, especially living areas.	The Proponent shall conduct noise and vibration monitoring at Project accommodations sites located at the Mary River mine site, Steensby Inlet Port site, and Milne Inlet Port site. Sampling shall be undertaken during the summer and winter months during all phases of Project development.	3 – Noise and Vibration	Considered, however no monitoring proposed during closure and negligible residual effects expected.	Both	N/A
15	Noise and Vibration	To enhance public safety when travelling around the Project area.	Noise and Vibration Monitoring – The Proponent shall collaborate to the extent possible with the Qikiqtani Inuit Association and local Hamlet organizations when undertaking consultation with all affected communities regarding railway, tote road and marine shipping operations. During these consultations, it is recommended that the Proponent provide information including video, audio, and photographic representation as well as any other aids (i.e. models) that may enhance the general public's understanding of railway, tote road	3 – Noise and Vibration	When undertaking consultation with all affected communities, collaboration with the Qikiqtani Inuit Association and local Hamlet organizations performed via Mine Closure Working Group sessions.	Both	Section 2.4

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 209 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 12.3: NIRB Project Certificate Term and Conditions Concordance Table

Ref #	Category	Objective	Project Condition/Type A Water Licence Condition	Related VEC	Associated Closure/Post-Closure Monitoring Program	IOL/Crown land	ICRP Ref
			and marine shipping operations, as well as all safety considerations for members of the public who may be travelling around the project area.				
17	Hydrology and Hydrogeology – Effluent Management	To prevent impacts to water bodies from effluent.	The Proponent shall develop and implement effectiveness measures to ensure that effluent from project-related facilities and/or activities, including sewage treatment plants, ore stockpiles, and mine pit, satisfies all discharge criteria requirement established by the relevant regulatory agencies prior to being discharged into the receiving environment.	8 – Water Quality	Aquatic Monitoring and Reporting Program Environmental Effects Monitoring Program	Both	Section 9.5 Section 9.3.1
18	Hydrology and Hydrogeology – Pit Lake Monitoring	To enhance predictions for mine site closure conditions.	The Proponent shall carry out continued analyses over time to confirm and update, accordingly, the approximate fill time for the mine pit lake identified in the FEIS.	8 – Water Quality 9 – Surface water and sediment quality	None. ICRP will be reviewed annually and updated regularly throughout the life of the Project to confirm and/or update, accordingly the approximate fill time for the mine pit lake identified in the FEIS.	IOL	Section 2.3.1.3
19	Hydrology and Hydrogeology – Water Infrastructure Monitoring	To mitigate impacts to natural water flow.	The Proponent shall ensure that it develops and implements adequate monitoring and maintenance procedures to ensure that the culverts and other conduits that may be prone to blockage do not significantly hinder or alter the natural flow of water from areas associated with the proposed mine. In addition, the Proponent shall monitor, document and report the withdrawal rates for water removed and utilized for all domestic and industrial purposes.	8 – Water Quality 9 – Surface water and sediment quality	Will be addressed in Annual Report.	Both	N/A

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 210 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 12.3: NIRB Project Certificate Term and Conditions Concordance Table

Ref #	Category	Objective	Project Condition/Type A Water Licence Condition	Related VEC	Associated Closure/Post-Closure Monitoring Program	IOL/Crown land	ICRP Ref
20	Groundwater/Surface Waters – Explosives	To ensure that the effects associated with the manufacturing, storage, transportation and use of explosives do not negatively impact the areas surrounding the Project.	The Proponent shall monitor the effects of explosives residue and related by-products from project-related blasting activities as well as develop and implement effective preventative and/or mitigation measures, including treatment, if necessary, to ensure that the effects associated with the manufacturing, storage, transportation and use of explosives do not negatively impact the Project and surrounding areas.	8 – Water Quality 9 – Surface water and sediment quality	None. Negligible once closure activities have ceased	N/A	N/A
24	Groundwater/Surface Waters – Effluent Management	To mitigate impacts to groundwater and surface waters from effluent	The Proponent shall monitor as required the relevant parameters of the effluent generated from Project activities and facilities and shall carry out treatment if necessary to ensure that discharge conditions are met at all times.	8 – Water Quality	Aquatic Monitoring and Reporting Program	Both	Section 9.5
27	Landforms, Geology and Geomorphology – Natural Aesthetics	To mitigate impacts to natural aesthetics.	The Proponent shall include within its public consultation report information related to the sentiments expressed by affected communities about the impacts that changes to the topography and landscape have had on the aesthetic value of the Project area.	4 – Landforms, soil and permafrost	Geotechnical/Engineering Monitoring	Both	Section 9.2
28	Landforms, Geology and Geomorphology – Permafrost	To ensure that permafrost integrity is maintained.	The Proponent shall monitor the effects of the Project on the permafrost along the railway and all other Project affected areas and must implement effective preventative measures to ensure that the integrity of the permafrost is maintained.	4 – Landforms, soil and permafrost	Geotechnical/Engineering Monitoring	Both	Section 9.2
30	Landforms, Geology and Geomorphology – Quarries	To provide oversight on quarry design and management.	The Proponent shall develop site-specific quarry operation and management plans in advance of the development of any potential quarry site or borrow pit.	4 – Landforms, soil and permafrost	Geotechnical/Engineering Monitoring	Both	Section 9.2

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 211 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 12.3: NIRB Project Certificate Term and Conditions Concordance Table

Ref #	Category	Objective	Project Condition/Type A Water Licence Condition	Related VEC	Associated Closure/Post-Closure Monitoring Program	IOL/Crown land	ICRP Ref
32	Vegetation – Construction and Operations	To prevent introduction of invasive species.	The Proponent shall ensure that equipment and supplies brought to the Project sites are 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.	5 – Vegetation	Terrestrial Environment Monitoring and Reporting	Both	Section 9.5
33	Vegetation – Monitoring	To facilitate monitoring.	The Proponent shall include relevant Monitoring and Management Plans within its Environmental Management System, Terrestrial Environment Management and Monitoring Plan (TEMMP).	5 – Vegetation	Terrestrial Environment Monitoring and Reporting	Both	Section 9.5
37	Vegetation – Monitoring	To prevent establishment of invasive species.	The Proponent shall incorporate protocols for monitoring for the potential introduction of invasive vegetation species (e.g. surveys of plant populations in previously disturbed areas) into its Terrestrial Environment and Monitoring Plan. Any introductions of non-indigenous plant species must be promptly reported to the Government of Nunavut Department of Environment.	5 – Vegetation	Terrestrial Environment Monitoring and Reporting	Both	Section 9.5
38	Vegetation – Adaptive Management	To mitigate impacts to vegetation abundance, diversity and health.	The Proponent shall review, on an annual basis, all monitoring information and the vegetation mitigation and management plans developed under its Environmental Management System, Terrestrial Environment and Monitoring Plan (TEMMP) and adjust such plans as may be required to effectively prevent or reduce the potential for significant adverse project effects on vegetation abundance, diversity and health.	5 – Vegetation	Terrestrial Environment Monitoring and Reporting	Both	Section 9.5

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 212 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 12.3: NIRB Project Certificate Term and Conditions Concordance Table

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39	Vegetation – Reclamation and Revegetation	To prevent erosion and promote progressive revegetation of disturbed areas.	The Proponent shall develop a progressive revegetation program for disturbed areas that are no longer required for operations, such program to incorporate measures for the use of test plots, reseeding and replanting of native plants as necessary. It is further recommended that this program be directly associated with the management plans for erosion control established for the Project.	5 – Vegetation	Terrestrial Environment Monitoring and Reporting	Both	Section 6 Section 9.5
40	Vegetation – Reclamation and Revegetation	To prevent erosion and promote progressive revegetation of disturbed areas.	The Proponent shall include revegetation strategies in its Site Reclamation Plan that support progressive reclamation and that promote natural revegetation and recovery of disturbed areas compatible with the surrounding natural environment.	5 – Vegetation	Terrestrial Environment Monitoring and Reporting	Both	Section 6 Section 9.5
41	Freshwater Aquatic Environment – Setbacks	To mitigate impacts of runoff into freshwater aquatic habitat.	Unless otherwise approved by regulatory authorities, the Proponent shall maintain a minimum 100-metre naturally-vegetated buffer between the high-water mark of any fish-bearing water bodies and any permanent quarries with potential for acid rock drainage or metal leaching.	4 – Landforms, soil and permafrost 5 – Vegetation	Geotechnical/Engineering Monitoring	Both	Section 9.2
42	Freshwater Aquatic Environment – Setbacks	To mitigate impacts of runoff into freshwater aquatic habitat.	The Proponent shall maintain minimum a 30-metre naturally-vegetated buffer between the mining operation and adjacent water bodies.	4 – Landforms, soil and permafrost 5 – Vegetation	Geotechnical/Engineering Monitoring	Both	Section 9.2
44	Freshwater Aquatic Environment – Explosives	To mitigate impacts of explosives on freshwater aquatic habitat.	The Proponent shall meet or exceed the guidelines set by Fisheries and Oceans Canada for blasting thresholds and implement practical and effective measures to ensure that residue and by-products of blasting do not negatively affect fish and fish habitat.	8 – Water Quality	Aquatic Monitoring and Reporting Program Environmental Effects Monitoring Program	Both	Section 9.5 Section 9.3.1

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 213 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 12.3: NIRB Project Certificate Term and Conditions Concordance Table

Ref #	Category	Objective	Project Condition/Type A Water Licence Condition	Related VEC	Associated Closure/Post-Closure Monitoring Program	IOL/Crown land	ICRP Ref
45	Freshwater Aquatic Environment – General	To mitigate impacts to freshwater aquatic habitat.	The Proponent shall adhere to the No-Net-Loss principle at all phases of the project to prevent or mitigate direct or indirect fish and fish habitat losses.	10 – freshwater fish, fish habitat, and other aquatic organisms	Aquatic Monitoring and Reporting Program Environmental Effects Monitoring Program	Both	Section 9.5 Section 9.3.1
46	Freshwater Aquatic Environment – Drainage	To mitigate impacts to freshwater aquatic habitat.	The Proponent shall ensure that runoff from fuel storage and maintenance facility areas, sewage and wastewater other facilities responsible for generating liquid effluent and runoff meet discharge requirements.	8 – Water Quality	Aquatic Monitoring and Reporting Program Environmental Effects Monitoring Program	Both	Section 9.5 Section 9.3.1
49	Terrestrial Wildlife and Wildlife Habitat – Terrestrial Environment Working Group	The TEWG will provide direction and guidance to the Proponent regarding: adding to baseline information during construction and before project operations commence; monitoring and reporting regarding effects occurring during operations; and providing advice regarding changes that may be required to make sure the management of negative impacts is effective and that lasting damage is prevented.	The Proponent shall establish a Terrestrial Environment Working Group (“TEWG”) which will act as an advisory group in connection with mitigation measures for the protection of the terrestrial environment and in connection with its Environmental Effects Monitoring Program, as it pertains to the terrestrial environment. Members may consider the draft terms of reference for the TEWG filed in the Final Hearing, but they are not bound by them. The role of the TEWG is not intended to either duplicate or to affect the exercise of regulatory authority by appropriate government agencies and departments.	7 – Terrestrial wildlife and habitat	Terrestrial Environment Monitoring and Reporting	Both	Section 9.5

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 214 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 12.3: NIRB Project Certificate Term and Conditions Concordance Table

Ref #	Category	Objective	Project Condition/Type A Water Licence Condition	Related VEC	Associated Closure/Post-Closure Monitoring Program	IOL/Crown land	ICRP Ref
50	Terrestrial Wildlife and Habitat – General	To ensure appropriate and responsive adaptive management.	The Proponent shall continue to develop and implement Project-specific monitoring for the terrestrial environment, and will demonstrate appropriate refinements to design, incorporation of analytical methods and elaboration of methodologies. The monitoring plan shall contain clear thresholds to allow for the assessment of long-term trends and cumulative effects where project interactions are identified. Coordination and cooperation will be required where data collection, analysis and interpretation, or responsibility for mitigation and management requires the efforts of multiple parties (e.g., government, Qikiqtani Inuit Association, communities).	7 – Terrestrial wildlife and habitat	Terrestrial Environment Monitoring and Reporting	Both	Section 9.5
51	Terrestrial Wildlife and Habitat – General	To promote coordination of monitoring efforts.	The Proponent, either directly or as part of the TEWG, shall consider and, where appropriate, cooperate with relevant regional and/or community-based monitoring initiatives that raise issues or produce information pertinent to mitigating project-induced impacts. The Proponent shall give special consideration for supporting regional studies of population health and harvest programs for North Baffin caribou which help address areas of uncertainty for Project impact predictions.	7 – Terrestrial wildlife and habitat	Terrestrial Environment Monitoring and Reporting	Both	Section 9.5
55	Terrestrial Wildlife and Habitat – Reporting	To mitigate potential impacts to wolves.	The Proponent shall develop an adaptive management plan applicable to wolves and wolf habitat in collaboration with the Government of Nunavut-Department of	7 – Terrestrial wildlife and habitat	Terrestrial Environment Monitoring and Reporting	Both	Section 9.5

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 215 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 12.3: NIRB Project Certificate Term and Conditions Concordance Table

Ref #	Category	Objective	Project Condition/Type A Water Licence Condition	Related VEC	Associated Closure/Post-Closure Monitoring Program	IOL/Crown land	ICRP Ref
			Environment (GN-DOE) to ensure compliance with the <i>Nunavut Wildlife Act</i> . Consideration must be given to the following: a. Monitoring for active wolf dens within a 10 km radius from the mine site, under the direction and prior approval of the GN DOE, and reporting the results through NIRB's Annual Reports on terrestrial wildlife in the Potential Development Area (PDA); b. Estimating the available (glacio-fluvial materials) esker habitat within the Regional Study Area/PDA and identifying such habitat as ecologically sensitive; c. Developing "wolf indices" for presence/abundance of wolves (by conducting studies) to set a baseline pre-construction baseline; and d. Ensuring that wolf monitoring is capable of determining the relative abundance and distribution of wolves in the Project Development				
56	Terrestrial Wildlife and Habitat – Reporting		The Proponent shall develop a strategy for the recovery of terrestrial wildlife habitat in a progressive manner that is consistent with the <i>Nunavut Wildlife Act</i> . Overall, this will require the integration of a decision-making process and the identification of mitigation responses to cumulative impacts on caribou survival, breeding propensity, and population dynamics.	7 – Terrestrial wildlife and habitat	Terrestrial Environment Monitoring and Reporting	Both	Section 9.5

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 216 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 12.3: NIRB Project Certificate Term and Conditions Concordance Table

Ref #	Category	Objective	Project Condition/Type A Water Licence Condition	Related VEC	Associated Closure/Post-Closure Monitoring Program	IOL/Crown land	ICRP Ref
57	Terrestrial Wildlife and Habitat – Aircraft Disturbances	To mitigate and monitor for impacts to wildlife.	The Proponent shall report annually regarding its terrestrial environment monitoring efforts, with inclusion of the following information: a. Description of all updates to terrestrial ecosystem baseline data; b. A description of the involvement of Inuit in the monitoring program; c. An explanation of the annual results relative to the scale of the natural variability of Valued Ecosystem Components in the region, as described in the baseline report; d. A detailed presentation and analysis of the distribution relative to mine structures and activities for caribou and other terrestrial mammals observed during the surveys and incidental sightings; e. Results of the annual monitoring program, including field methodologies and statistical approaches used to support conclusions drawn; f. A summary of the chronology and level of mine activities (such as vehicle frequency and type); g. An assessment and presentation of annual environmental conditions including timing of snowmelt, green-up, as well as standard weather summaries; and h. A discussion of any proposed changes to the monitoring survey methodologies, statistical approaches or proposed adaptive management stemming from the results of the monitoring program.	7 – Terrestrial wildlife and habitat	Terrestrial Environment Monitoring and Reporting Reporting requirements will be addressed in Annual Report.	Both	Section 9.5

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 217 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 12.3: NIRB Project Certificate Term and Conditions Concordance Table

Ref #	Category	Objective	Project Condition/Type A Water Licence Condition	Related VEC	Associated Closure/Post-Closure Monitoring Program	IOL/Crown land	ICRP Ref
58	Terrestrial Wildlife and Habitat – Explosives	To mitigate and monitor for impacts to wildlife.	Within its annual report to the NIRB, the Proponent shall incorporate a review section which includes: a. An examination for trends in the measured natural variability of Valued Ecosystem Components in the region relative to the baseline reporting; b. A detailed analysis of wildlife responses to operations with emphasis on calving and post-calving caribou behavior and displacements (if any), and caribou responses to and crossing of the railway, the Milne Inlet Tote Road and associated access roads/trails; c. A description of the extent of dust fall based on measured levels of dust fall (fugitive and finer particles such as TSP) on lichens and blueberries, and ash content of caribou fecal pellets; d. A demonstration and description of how the monitoring results, including the railway, road traffic, air traffic and dust fall contribute to cumulative effects of the project; e. Any proposed changes to the monitoring survey methodologies, statistical approaches or proposed adaptive management stemming from the results of the monitoring program; f. Any updates to information regarding caribou migration trails. Maps of caribou migration trails, primarily obtained through any new collar and snow tracking data, shall be updated (at least annually) in	7 – Terrestrial wildlife and habitat	Terrestrial Environment Monitoring and Reporting. Reporting requirements will be addressed in Annual Report.	Both	Section 9.5

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 218 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 12.3: NIRB Project Certificate Term and Conditions Concordance Table

Ref #	Category	Objective	Project Condition/Type A Water Licence Condition	Related VEC	Associated Closure/Post-Closure Monitoring Program	IOL/Crown land	ICRP Ref
			consultation with the Qikiqtani Inuit Association and affected communities, and shall be circulated as new information becomes available.				
59	Terrestrial Wildlife and Habitat – Operations (General)	To mitigate aircraft disturbance to wildlife and Inuit harvesting.	The Proponent shall ensure that aircraft maintain, whenever possible (except for specified operational purposes such as drill moves, take offs and landings), and subject to pilot discretion regarding aircraft and human safety, a cruising altitude of at least 610 metres during point to point travel when in areas likely to have migratory birds, and 1,000 metres vertical and 1,500 metres horizontal distance from observed concentrations of migratory birds (or as otherwise prescribed by the Terrestrial Environment Working Group) and use flight corridors to avoid areas of significant wildlife importance. The Proponent, in collaboration with the Terrestrial Environment Working Group shall develop a program or specific measures to ensure that employees and subcontractors providing aircraft services to the Project are respectful of wildlife and Inuit harvesting that may occur in and around project areas.	6 – Birds	Terrestrial Environment Monitoring and Reporting	Both	Section 9.5
61	Terrestrial Wildlife and Habitat – Public Engagement	To mitigate Project impacts to wildlife.	Whenever practical and not causing a human safety issue, a stop work policy shall be implemented when wildlife in the area may be endangered by the work being carried out. An operational definition of ‘endangered’ shall be provided by the Terrestrial Environment Working Group.	6 – Birds 7 – Terrestrial wildlife and habitat	Terrestrial Environment Monitoring and Reporting	Both	Section 9.5

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 219 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 12.3: NIRB Project Certificate Term and Conditions Concordance Table

Ref #	Category	Objective	Project Condition/Type A Water Licence Condition	Related VEC	Associated Closure/Post-Closure Monitoring Program	IOL/Crown land	ICRP Ref
62	Terrestrial Wildlife and Habitat – Waste Management	To prevent increased harvesting pressure on wildlife.	The Proponent shall prohibit project employees from transporting firearms to site and from operating firearms in project areas for the purpose of wildlife harvesting.	None.	None.	N/A	N/A
63	Birds – Awareness	To keep communities up to date with Project operations.	The Proponent shall liaise with local Hunters and Trappers Organizations in advance of carrying out terrestrial wildlife surveys. At a minimum, The Proponent shall also meet annually in person with Hunters and Trappers Organizations to discuss wildlife monitoring and mitigation plans and address community concerns regarding wildlife interactions. The Proponent may be required to facilitate these meetings through payment of honoraria and meeting costs.	6 – Birds 7 – Terrestrial wildlife and habitat	Terrestrial Environment Monitoring and Reporting	Both	Section 9.5
64	Birds – Species at Risk	To prevent human-carnivore interactions.	The Proponent shall ensure that its Environment Protection Plan incorporates waste management provisions to prevent carnivores from being attracted to the Project site(s). Consideration must be given to the following measures: a. Installation of an incinerator beside the kitchen that will help to keep the food waste management process simple and will minimize the opportunity for human error (i.e. storage of garbage outside, hauling in a truck (odours remain in truck), hauling some distance to a landfill site, incomplete combustion at landfill, fencing of landfill, etc.); and b. Installation of solid carnivore-proof skirting on all kitchen and accommodation buildings (i.e., heavy-duty steel mesh that	6 – Birds 7 – Terrestrial wildlife and habitat	Geotechnical/Engineering Monitoring	Both	Section 9.5

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 220 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 12.3: NIRB Project Certificate Term and Conditions Concordance Table

Ref #	Category	Objective	Project Condition/Type A Water Licence Condition	Related VEC	Associated Closure/Post-Closure Monitoring Program	IOL/Crown land	ICRP Ref
			would drop down from the edge of the buildings/trailers and buried about a half meter into the ground to prevent animals from digging under the skirting).				
65	Birds – Species at Risk	To prevent disturbance to birds and bird habitat.	The Proponent shall ensure all employees working at project sites receive awareness training regarding the importance of avoiding known nests and nesting areas and large concentrations of foraging and moulting birds.	6 – Birds	Terrestrial Environment Monitoring and Reporting	Both	Section 9.5
66	Birds – Project Infrastructure	To prevent impacts to sensitive bird species.	If Species at Risk or their nests and eggs are encountered during Project activities or monitoring programs, the primary mitigation measure must be avoidance. The Proponent shall establish clear zones of avoidance on the basis of the species-specific nest setback distances outlined in the Terrestrial Environment Management and Monitoring Plan.	6 – Birds	Terrestrial Environment Monitoring and Reporting	Both	Section 9.5
67	Birds – Construction/Clearing Activities	To prevent impacts to sensitive bird species.	The Proponent shall ensure that the mitigation and monitoring strategies developed for Species at Risk are updated as necessary to maintain consistency with any applicable status reports, recovery strategies, action plans and management plans that may become available during the duration of the Project.	6 – Birds	Terrestrial Environment Monitoring and Reporting	Both	Section 9.5
68	Birds – Construction/Clearing Activities	To prevent potential injuries to birds.	The Proponent shall ensure flashing red, red strobe or white strobe lights and guy-wire deterrents are used on communications towers established for the Project. Consideration should also be given to reducing lighting when possible in areas	6 – Birds	Geotechnical/Engineering Monitoring Terrestrial Environment Monitoring and Reporting	Both	Section 9.2 Section 9.5

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 221 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 12.3: NIRB Project Certificate Term and Conditions Concordance Table

Ref #	Category	Objective	Project Condition/Type A Water Licence Condition	Related VEC	Associated Closure/Post-Closure Monitoring Program	IOL/Crown land	ICRP Ref
			where it may serve as an attractant to birds or other wildlife.				
69	Birds – Flight Altitude Requirements	To prevent nesting by birds in active Project areas.	Prior to bird migrations and commencement of nesting, the Proponent shall identify and install nesting deterrents (e.g. flagging) to discourage birds from nesting in areas likely to be disturbed by construction/clearing activities taking place during the nesting season.	6 – Birds	Terrestrial Environment Monitoring and Reporting	Both	Section 9.5
70	Birds – Flight Altitude Requirements	To prevent impacts to birds and nesting areas.	The Proponent shall protect any nests found (or indicated nests) with a buffer zone determined by the setback distances outlined in its Terrestrial Environment Mitigation and Monitoring Plan, until the young have fledged. If it is determined that observance of these setbacks is not feasible, the Proponent will develop nest-specific guidelines and procedures to ensure bird's nests and their young are protected.	6 – Birds	Geotechnical/Engineering Monitoring Terrestrial Environment Monitoring and Reporting	Both	Section 9.2 Section 9.5
71	Birds – Monitoring	To mitigate aircraft disturbance to birds.	Subject to safety requirements, the Proponent shall require all project related aircraft to maintain a cruising altitude of at least: a. 650 m during point to point travel when in areas likely to have migratory birds b. 1100 m vertical and 1500 m horizontal distance from observed concentrations of migratory birds c. 1100 m over the area identified as a key site for moulting snow geese during the moulting period (July-August), and if maintaining this altitude is not possible, maintain a lateral distance of at least at	6 – Birds	Terrestrial Environment Monitoring and Reporting	Both	Section 9.5

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 222 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 12.3: NIRB Project Certificate Term and Conditions Concordance Table

Ref #	Category	Objective	Project Condition/Type A Water Licence Condition	Related VEC	Associated Closure/Post-Closure Monitoring Program	IOL/Crown land	ICRP Ref
			least 1500 m from the boundary of this site.				
72	Birds – Monitoring	To mitigate aircraft disturbance to birds.	The Proponent shall ensure that pilots are informed of minimum cruising altitude guidelines and that a daily log or record of flight paths and cruising altitudes of aircraft within all Project Areas is maintained and made available for regulatory authorities such as Transport Canada to monitor adherence and to follow up on complaints.	None.	None.	N/A	N/A
73	Birds – Monitoring	To develop appropriate mitigation and monitoring of impacts to birds.	The Proponent shall develop detailed and robust mitigation and monitoring plans for migratory birds, reflecting input from relevant agencies, the Qikiqtani Inuit Organization and communities as part of the Terrestrial Environment Working Group and to the extent applicable the Marine Environment Working Group.	6 – Birds	Terrestrial Environment Monitoring and Reporting Mine Closure Working Group	Both	Section 9.5 Section 2.4
74	Birds – Monitoring	To develop appropriate mitigation and monitoring of impacts to birds.	The Proponent shall continue to develop and update relevant monitoring and management plans for migratory birds under the Proponent's Environmental Management System, Terrestrial Environment Mitigation and Monitoring Plan prior to construction. The key indicators for follow up monitoring under this plan will include: peregrine falcon, gyrfalcon, common and king eider, red knot, seabird migration and wintering, and songbird and shorebird diversity.	6 – Birds	Terrestrial Environment Monitoring and Reporting	Both	Section 9.5
75	Birds – Monitoring	To assess the extent of terrestrial habitat loss.	The Proponent's monitoring program shall assess and report, on annual basis, the extent of terrestrial habitat loss due to the Project to verify impact predictions and	6 – Birds	Terrestrial Environment Monitoring and Reporting	Both	Section 9.5

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 223 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 12.3: NIRB Project Certificate Term and Conditions Concordance Table

Ref #	Category	Objective	Project Condition/Type A Water Licence Condition	Related VEC	Associated Closure/Post-Closure Monitoring Program	IOL/Crown land	ICRP Ref
			provide updated estimates of the total project footprint.				
76	Marine Environment – Ice Breaking and Shipping	To mitigate potential impacts to the marine environment.	The Proponent shall develop a comprehensive Environmental Effects Monitoring Program to address concerns and identify potential impacts of the Project on the marine environment.	N/A – Related to Marine Monitoring	N/A	Crown (Marine)	N/A
77	Marine Environment – Ice Breaking and Shipping	The MEWG will consult with, and provide advice and recommendations to the Proponent in connection with mitigation measures for the protection of the marine environment, monitoring of effects on the marine environment and the consideration of adaptive management plans. The role of the MEWG is not intended to either duplicate or to affect the exercise of regulatory authority by appropriate government agencies and departments.	A Marine Environment Working Group (“MEWG”) shall be established to serve as an advisory group in connection with mitigation measures for the protection of the marine environment, and in connection with the Project Environmental Effects Monitoring program, as it pertains to the marine environment. Membership on the MEWG will include the Proponent, Environment Canada, Fisheries and Oceans Canada, Parks Canada, the Government of Nunavut, the Qikiqtani Inuit Association, the Mittimatilik Hunters and Trappers Organization, and other agencies or interested parties as determined to be appropriate by these key members. Makivik Corporation shall also be entitled to membership on the MEWG at its election. The MEWG members may consider the draft terms of reference	N/A – Related to Marine Monitoring	N/A	Crown (Marine)	N/A
78	Marine Environment – Ice Breaking and Shipping	To obtain accurate and current ice information.	The Proponent shall update the baseline information for landfast ice using a long-term dataset (28 years), and with	N/A – Related to Marine Monitoring	N/A	Crown (Marine)	N/A

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 224 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 12.3: NIRB Project Certificate Term and Conditions Concordance Table

Ref #	Category	Objective	Project Condition/Type A Water Licence Condition	Related VEC	Associated Closure/Post-Closure Monitoring Program	IOL/Crown land	ICRP Ref
			information on inter-annual variation. The analysis for pack and landfast ice shall be updated annually using annual sea ice data (floe size, cover, concentration) and synthesized and reported in the most appropriate management plan.				
79	Marine Environment – Shoreline Effects and Sediment Redistribution	To assist in the development of nautical charts for Canadian waters.	The Proponent shall provide the Canadian Hydrographic Services with bathymetric data and other relevant information collected in support of Project shipping where possible, to assist in the development of nautical charts for Canadian waters.	N/A – Related to Marine Monitoring	N/A	Crown (Marine)	N/A
87	Marine Environment – Ballast Water	To prevent invasive species introductions resulting from Project shipping.	The Proponent shall develop a detailed monitoring program at a number of sites over the long term to evaluate changes to marine habitat and organisms and to monitor for non-native introductions resulting from Project-related shipping. This program needs to be able to detect changes that may have biological consequences and should be initiated several years prior to any ballast water discharge into Steensby Inlet and Milne Inlet to collect sufficient baseline data and should continue over the life of the Project.	N/A – Related to Marine Monitoring	N/A	Crown (Marine)	N/A
89	Marine Environment – Ballast Water	To prevent impacts to marine water quality resulting from ballast water exchange.	The Proponent shall develop and implement an effective ballast water management program that may include the treatment and monitoring of ballast water discharges in a manner consistent with applicable regulations and/or exceed those regulations if they are determined to be ineffective for providing the desired and	N/A – Related to Marine Monitoring	N/A	Crown (Marine)	N/A

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 225 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 12.3: NIRB Project Certificate Term and Conditions Concordance Table

Ref #	Category	Objective	Project Condition/Type A Water Licence Condition	Related VEC	Associated Closure/Post-Closure Monitoring Program	IOL/Crown land	ICRP Ref
			predicted results. The ballast water management program shall include, without limitation, a provision that requires ship owners to test their ballast water to confirm that it meets the salinity requirements of the applicable regulations prior to discharge at the Milne Port, and a requirement noting that the Proponent, in choosing shipping contractors will, whenever feasible, give preference to contractors that use ballast water treatment in addition to ballast water exchange.				
92	Marine Environment – Spill Prevention	To ensure adequate spill response capacity.	The Proponent shall ensure that it maintains the necessary equipment and trained personnel to respond to all sizes of potential spills associated with the Project in a self sufficient manner.	N/A – Related to Marine Monitoring	N/A	Crown (Marine)	N/A
103	Marine Environment – Traffic Log and Shipping Information	To monitor effectiveness of mitigation of shipping impacts to marine wildlife.	The Proponent shall report annually to the NIRB regarding project-related ship track and sea ice information, including: a. A record of all ship tracks taken along both shipping routes covering the entire shipping season; b. When employing ice-breaking, an overlay of ship tracks onto ice imagery to determine whether ships are effectively avoiding shore leads and polynyas; c. A comparison of recorded ship tracks to the expected nominal shipping route, and probable (if any) extent of year-round shipping during periods of ice cover and open-water; d. An assessment of the level of adherence	N/A – Related to Marine Monitoring	N/A	Crown (Marine)	N/A

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 226 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 12.3: NIRB Project Certificate Term and Conditions Concordance Table

Ref #	Category	Objective	Project Condition/Type A Water Licence Condition	Related VEC	Associated Closure/Post-Closure Monitoring Program	IOL/Crown land	ICRP Ref
			to the nominal shipping route and the spatial extent of the shipping zone of influence; and e. When employing ice-breaking, marine bird and mammal species and number of individuals attracted to ship tracks in ice.				
106	Marine Environment – Shipboard Observers	To ensure that interactions with marine mammals and Project shipping activities are effectively monitored.	The Proponent shall ensure that shipboard observers are employed during seasons where shipping occurs and provided with the means to effectively carry out assigned duties. The role of shipboard observers in shipping operations should be taken into consideration during the design of any ore carriers purpose-built for the Project, with climate controlled stations and shipboard lighting incorporated to permit visual sightings by shipboard observers during all seasons and conditions. Any shipboard lighting incorporated should be in accordance with the <i>Canada Shipping Act, 2001's Collision Regulations</i> , and should not interfere with safe navigation of the vessel.	N/A – Related to Marine Monitoring	N/A	Crown (Marine)	N/A
113	Marine Environment – Arctic Char	To prevent impacts to marine fish in Steensby Inlet and Milne Inlet	The Proponent shall conduct monitoring of marine fish and fish habitat, which includes but is not limited to, monitoring for Arctic Char stock size and health condition in Steensby Inlet and Milne Inlet, as recommended by the Marine Environment Working Group.	N/A – Related to Marine Monitoring	N/A	Crown (Marine)	N/A
114	Marine Environment – Arctic Char	To prevent impacts to marine fish in Steensby Inlet and Milne Inlet.	In the event of the development of a commercial fishery in the Steensby Inlet area or Milne Inlet-Eclipse Sound areas, the Proponent, in conjunction with the Marine	N/A – Related to Marine Monitoring	N/A	Crown (Marine)	N/A

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 227 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 12.3: NIRB Project Certificate Term and Conditions Concordance Table

Ref #	Category	Objective	Project Condition/Type A Water Licence Condition	Related VEC	Associated Closure/Post-Closure Monitoring Program	IOL/Crown land	ICRP Ref
			Environment Working Group, shall update its monitoring program for marine fish and fish habitat to ensure that the ability to identify Arctic Char stock(s) potentially affected by Project activities and monitor for changes in stock size and structure of affected stocks and fish health (condition, taste) is maintained to address any additional monitoring issues identified by the MEWG relating to the commercial fishery.				
120	Marine Environment – Marine Mammal Interactions	To prevent impacts to marine mammals associated with Project shipping.	The Proponent shall ensure that, subject to vessel and human safety considerations, all project shipping adhere to the following mitigation procedures while in the vicinity of marine mammals: a. Wildlife will be given right of way; b. Ships will when possible, maintain a straight course and constant speed, avoiding erratic behavior; and c. When marine mammals appear to be trapped or disturbed by vessel movements, the vessel will implement appropriate measures to mitigate disturbance, including stoppage of movement until wildlife have moved away from the immediate area.	N/A – Related to Marine Monitoring	N/A	Crown (Marine)	N/A
121	Marine Environment – Marine Mammal Interactions	To prevent impacts to marine mammals and seabird colonies associated with Project shipping.	The Proponent shall immediately report any accidental contact by project vessels with marine mammals or seabird colonies to Fisheries and Oceans Canada and Environment Canada respectively, by notifying the appropriate regional office of the:	N/A – Related to Marine Monitoring	N/A	Crown (Marine)	N/A

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 228 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 12.3: NIRB Project Certificate Term and Conditions Concordance Table

Ref #	Category	Objective	Project Condition/Type A Water Licence Condition	Related VEC	Associated Closure/Post-Closure Monitoring Program	IOL/ Crown land	ICRP Ref
			a. Date, time and location of the incident; b. Species of marine mammal or seabird involved; c. Circumstances of the incident; d. Weather and sea conditions at the time; e. Observed state of the marine mammal or sea bird colony after the incident; and, f. Direction of travel of the marine mammal after the incident, to the extent that it can be determined				
122	Marine Environment – Marine Mammal Interactions	To prevent impacts to marine mammals and seabird colonies associated with Project shipping.	The Proponent shall summarize and report annually to the NIRB regarding accidental contact by project vessels with marine mammals or seabird colonies through the applicable monitoring report.	N/A – Related to Marine Monitoring	N/A	Crown (Marine)	N/A
123	Marine Environment – Marine Mammal Interactions	To prevent impacts to marine mammals and seabird colonies associated with Project shipping.	The Proponent shall provide sufficient marine mammal observer coverage on project vessels to ensure that collisions with marine mammals and seabird colonies are observed and reported through the life of the Project. The marine wildlife observer protocol shall include, but not be limited to, protocols for marine mammals, seabirds, and environmental conditions and immediate reporting of significant observations to the ship masters of other vessels along the shipping route, as part of the adaptive management program to address any items that require immediate action.	N/A – Related to Marine Monitoring	N/A	Crown (Marine)	N/A
124	Marine Environment – Marine Mammal Interactions	To prevent impacts to marine mammals and marine fish populations from	The Proponent shall prohibit project employees from recreational boating, fishing, and harvesting of marine wildlife in project areas, including Steensby Inlet and	N/A – Related to Marine Monitoring	N/A	Crown (Marine)	N/A

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 229 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 12.3: NIRB Project Certificate Term and Conditions Concordance Table

Ref #	Category	Objective	Project Condition/Type A Water Licence Condition	Related VEC	Associated Closure/Post-Closure Monitoring Program	IOL/Crown land	ICRP Ref
		increased harvesting pressures in Project areas.	Milne Inlet. The Proponent is not directed to interfere with harvesting by the public in or near project areas, however, enforcement of a general prohibition on harvesting in project areas by project employees during periods of active employment (i.e. while on site and between work shifts) is required.				
125	Marine Environment – Public Engagement	To assess acceptability of acoustic deterrent devices for the general public.	Prior to use of acoustic deterrent devices, the Proponent shall carry out consultations with communities along the shipping routes and nearest to Steensby Inlet and Milne Inlet ports to assess the acceptability of these devices. Feedback received from community consultations shall be incorporated into the appropriate mitigation plan.	N/A – Related to Marine Monitoring	N/A	Crown (Marine)	N/A
125 a	Marine Environment – Public Engagement	To ensure public acceptability of project vessel anchor sites and reduce potential conflicts between project marine shipping and local harvesting.	The Proponent shall consult with potentially-affected communities and groups, particularly Hunters' and Trappers' Organizations regarding the identification of project vessel anchor sites and potential areas of temporary refuge for project vessels along the shipping routes within the Nunavut Settlement Area. Feedback received from community consultations shall be incorporated into the most appropriate mitigation or management plans.	N/A – Related to Marine Monitoring	N/A	Crown (Marine)	N/A
127	Marine Environment – Public Engagement	To promote public awareness and engagement with Project shipping activities.	The Proponent shall ensure that communities and groups in Nunavik are kept informed of project shipping activities and are provided with opportunity to participate in the continued development	N/A – Related to Marine Monitoring	N/A	Crown (Marine)	N/A

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 230 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 12.3: NIRB Project Certificate Term and Conditions Concordance Table

Ref #	Category	Objective	Project Condition/Type A Water Licence Condition	Related VEC	Associated Closure/Post-Closure Monitoring Program	IOL/Crown land	ICRP Ref
			and refinement of shipping related monitoring and mitigation plans.				
128	Marine Environment – Public Engagement	To ensure habitat compensation is acceptable to local communities.	The Proponent shall consult with local communities as fish habitat off-setting options are being considered and demonstrate its incorporation of input received into the design of the Fish Habitat Off-Setting Plan required to offset the Harmful Alteration, Disruption or Destruction of Fish and Fish Habitat (HADD).	N/A – Related to Marine Monitoring	N/A	Crown (Marine)	N/A
129	Population Demographics – Qikiqtaaluk Socio-Economic Monitoring Committee	Description of the general monitoring framework to be developed in consultation with the Qikiqtaaluk Socio-Economic Monitoring Committee.	The Proponent is strongly encouraged to engage in the work of the Qikiqtaaluk Socio-Economic Monitoring Committee along with other agencies and affected communities, and it should endeavor to identify areas of mutual interest and priorities for inclusion into a collaborative monitoring framework that includes socio-economic priorities related to the Project, communities, and the North Baffin region as a whole.	N/A – Related to Population demographics	Will be addressed by the Socio-Economic Monitoring Committee	Both	Section 9.10
130	Population Demographics – Project-specific monitoring	Recognizing that some Project-specific socio-economic monitoring initiatives may be best addressed in smaller more focused working groups, this is encouraged where possible.	The Proponent should consider establishing and coordinating with smaller socio-economic working groups to meet Project specific monitoring requirements throughout the life of the Project.	N/A – Related to Population demographics	Will be addressed by the Socio-Economic Monitoring Committee	Both	Section 9.10

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 231 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 12.3: NIRB Project Certificate Term and Conditions Concordance Table

Ref #	Category	Objective	Project Condition/Type A Water Licence Condition	Related VEC	Associated Closure/Post-Closure Monitoring Program	IOL/Crown land	ICRP Ref
131	Population Demographics – Monitoring demographic changes	To monitor demographic changes affecting the North Baffin communities and the territory as a whole in order to understand changes and to evaluate the Proponent's predictions as related to population demographics.	The Qikiqtaaluk Socio-Economic Monitoring Committee is encouraged to engage in the monitoring of demographic changes including the movement of people into and out of the North Baffin communities and the territory as a whole. This information may be used in conjunction with monitoring data obtained by the Proponent from recent hires and/or out-going employees in order to assess the potential effect the Project has on migration.	N/A – Related to Population demographics	Will be addressed by the Socio-Economic Monitoring Committee	Both	Section 9.10
132	Population Demographics – Training programs	To develop training programs in ways which contribute to limiting the potential for migration to occur as North Baffin residents seek training and employment opportunities in the larger centre of Iqaluit.	The Proponent is encouraged to partner with other agencies such as Hamlet organizations in the North Baffin region, the Municipal Training Organization, and the Government of Nunavut in order to adapt pre-existing, or to develop new programs which encourage Inuit to continue living in their home communities while seeking ongoing and progressive training and development. Programs may include driver training programs offered within Hamlets, providing upgraded equipment to communities for use in municipal works, providing incentives for small businesses to remain operating out of their community of origin, or supplementing existing recreational facilities and programming in North Baffin communities.	N/A – Related to Education and Training	Will be addressed by the Socio-Economic Monitoring Committee	Both	Section 9.10
133	Population Demographics – Monitoring	Training programs may be developed with the goal of	The Proponent is encouraged to work with the Qikiqtaaluk Socio-Economic Monitoring Committee and in collaboration with the	N/A – Related to Population demographics	Will be addressed by the Socio-Economic Monitoring Committee	Both	Section 9.10

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 232 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 12.3: NIRB Project Certificate Term and Conditions Concordance Table

Ref #	Category	Objective	Project Condition/Type A Water Licence Condition	Related VEC	Associated Closure/Post-Closure Monitoring Program	IOL/Crown land	ICRP Ref
	demographic changes	limiting the potential for migration to occur as North Baffin residents may choose to seek employment and therefore move from smaller North Baffin communities to the larger centre of Iqaluit.	Government of Nunavut's Department of Health and Social Services, the Nunavut Housing Corporation and other relevant stakeholders, design and implement a voluntary survey to be completed by its employees on an annual basis in order to identify changes of address, housing status (i.e. public/social, privately owned/rented, government, etc.), and migration intentions while respecting confidentiality of all persons involved. The survey should be designed in collaboration with the Government of Nunavut's Department of Health and Social Services, the Nunavut Housing Corporation and other relevant stakeholders. Non-confidential results of the survey are to be reported to the Government of Nunavut and the NIRB.				
134	Population Demographics – Employee origin	Project-specific information regarding employee origin is important to comparing predictions of labour availability and employment opportunities with actual levels of employment from various demographic segments over different geographic areas.	The Proponent shall include with its annual reporting to the NIRB a summation of employee origin information as follows: a. The number of Inuit and non-Inuit employees hired from each of the North Baffin communities, specifying the number from each; b. The number of Inuit and non-Inuit employees hired from each of the Kitikmeot and Kivalliq regions, specifying the number from each; c. The number of Inuit and non-Inuit employees hired from a southern location or other province/territory outside of Nunavut, specifying the locations and the number from each; and	N/A – Related to Population demographics	Included in Annual Report to NIRB and the Annual IIBA Implementation Report	Both	Section 9.10

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 233 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 12.3: NIRB Project Certificate Term and Conditions Concordance Table

Ref #	Category	Objective	Project Condition/Type A Water Licence Condition	Related VEC	Associated Closure/Post-Closure Monitoring Program	IOL/Crown land	ICRP Ref
			d. The number of non-Canadian foreign employees hired, specifying the locations and number from each foreign point of hire.				
145	Livelihood and Employment – Barriers to employment for women	To monitor and understand the existence of barriers to employment for women specifically relating to childcare availability and costs.	The Proponent is encouraged to work with the Government of Nunavut and the Qikiqtaaluk Socio-Economic Monitoring Committee to monitor the barriers to employment for women, specifically with respect to childcare availability and costs.	N/A – Related to Livelihood and Employment	Will be addressed by the Socio-Economic Monitoring Committee and the Closure Working Group closer to mine Closure	Both	Section 9.10
146	Livelihood and Employment – Availability of childcare for Project employees	To lessen the barriers to employment as relating to the availability of childcare.	The Government of Nunavut and the Qikiqtani Inuit Association are strongly encouraged to investigate the possibility for Project revenue streams to support initiatives or programs which offset or subsidize childcare for Project employees.	N/A – Related to Livelihood and Employment	Will be addressed by the Socio-Economic Monitoring Committee and the Closure Working Group closer to mine Closure	Both	Section 9.10
147	Livelihood and Employment – Affordability of housing	To lessen the barriers to maintaining employment as relating to the availability and costs of housing.	The Proponent is encouraged to work with the Government of Nunavut and the Nunavut Housing Corporation to investigate options and incentives which might enable and provide incentive for employees living in social housing to maintain employment as well as to negotiate for and obtain manageable rental rates.	N/A – Related to Livelihood and Employment	Will be addressed by the Socio-Economic Monitoring Committee and the Closure Working Group closer to mine Closure	Crown	Section 9.10
152	Economic Development and Self-Reliance, and Contracting and Business Opportunities – IIBA contract requirements	To improve ability of small businesses to access Project contract and sub-contract opportunities.	The Qikiqtani Inuit Association is encouraged to provide the Board and the Qikiqtaaluk Socio-Economic Monitoring Committee with information regarding the effectiveness of any provisions within the Inuit Impact and Benefit Agreement which may require that larger contracts be broken down into smaller size in order that	N/A – Related to Economic Development and Self-Reliance	Included in Annual IIBA Implementation Report to QIA. Will be addressed by the Socio-Economic Monitoring Committee and the Closure Working Group closer to mine Closure.	Both	Section 9.10

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 234 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 12.3: NIRB Project Certificate Term and Conditions Concordance Table

Ref #	Category	Objective	Project Condition/Type A Water Licence Condition	Related VEC	Associated Closure/Post-Closure Monitoring Program	IOL/Crown land	ICRP Ref
			they are reasonably managed by smaller businesses in the North Baffin region, while respecting any confidential or privileged information.				
153	Human Health and Well-Being – Employee and family health and well-being	To provide adequate medical services on site, including those that contribute to the mental health and well-being of all employees.	The Proponent is encouraged to employ a mental health professional to provide counseling to Inuit and non-Inuit employees in order to positively contribute toward employee health and well-being.	N/A – Related to Human health and well-being	Included in Annual IIBA Implementation Report to QIA. Will be addressed by the Closure Working Group closer to mine Closure	Crown	Section 9.10
154	Human Health and Well-being – Indirect impacts to health and well-being	To understand the indirect impacts of the Project upon health and well-being.	The Proponent shall work with the Government of Nunavut and the Qikiqtaaluk Socio-Economic Monitoring Committee to monitor potential indirect effects of the Project, including indicators such as the prevalence of substance abuse, gambling issues, family violence, marital problems, rates of sexually transmitted infections and other communicable diseases, rates of teenage pregnancy, high school completion rates, and others as deemed appropriate.	N/A – Related to Human health and well-being	Will be addressed by the Socio-Economic Monitoring Committee and the Closure Working Group closer to mine Closure	Both	Section 9.10
156	Human Health and Well-Being – Support initiatives	To assist with fostering well-being within point-of-hire communities.	The Proponent is encouraged to assist with the provision and/or support of recreation programs and opportunities within the potentially affected communities in order to mitigate potential impacts of employees' absences from home and community life.	N/A – Related to Human health and well-being	Will be addressed by the Socio-Economic Monitoring Committee and the Closure Working Group closer to mine Closure	Both	Section 9.10
157	Human Health and Well-Being – Counseling and treatment programs	To make available, necessary treatment and counseling services for employee and family well-being.	The Proponent should consider providing counseling and access to treatment programs for substance and gambling addictions as well as which address	N/A – Related to Human health and well-being	Included in Annual IIBA Implementation Report to QIA. Will be addressed by the Socio-Economic Monitoring Committee	Both	Section 9.10

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 235 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 12.3: NIRB Project Certificate Term and Conditions Concordance Table

Ref #	Category	Objective	Project Condition/Type A Water Licence Condition	Related VEC	Associated Closure/Post-Closure Monitoring Program	IOL/Crown land	ICRP Ref
			domestic, parenting, and marital issues that affect employees and/or their families.		and the Closure Working Group closer to mine Closure		
158	Community Infrastructure and Public Services – Impacts to health services	To monitor indirect Project impacts to health and social services provided by the Government of Nunavut.	The Proponent is encouraged to work with the Government of Nunavut and other parties as deemed relevant in order to develop a Human Health Working Group which addresses and establishes monitoring functions relating to pressures upon existing services and costs to the health and social services provided by the Government of Nunavut as such may be impacted by Project-related in-migration of employees, to both the North Baffin region in general, and to the City of Iqaluit in particular.	N/A – Related to Community Infrastructure and public service	Will be addressed by the Socio-Economic Monitoring Committee and the Closure Working Group closer to mine Closure	Crown	Section 9.10
159	Community Infrastructure and Public Services – Impacts to infrastructure	To monitor Project-related impacts to infrastructure within the Local Study Area communities.	The Proponent is encouraged to work with the Government of Nunavut to develop an effects monitoring program that captures increased Project-related pressures to community infrastructure in the Local Study Area communities, and to airport infrastructure in all point-of-hire communities and in Iqaluit.	N/A – Related to Community Infrastructure and public service	Will be addressed by the Socio-Economic Monitoring Committee and the Closure Working Group closer to mine Closure	Crown	Section 9.10
160	Community Infrastructure and Public Services – Distribution of benefits	To ensure the distribution of benefits is done in a way that off-sets Project-related impacts to infrastructure or services.	The Government of Nunavut and the Qikiqtani Inuit Association are encouraged to cooperate to ensure in a broad sense, that Project benefits	N/A – Related to Community Infrastructure and public service	Will be addressed by the Socio-Economic Monitoring Committee and the Closure Working Group closer to mine Closure	Both	Section 9.10
161	Community Infrastructure and	To ensure the territorial government	The Government of Nunavut should be prepared for any potential increased need	N/A – Related to Community	Will be addressed by the Socio-Economic	Crown	Section 9.10

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 236 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 12.3: NIRB Project Certificate Term and Conditions Concordance Table

Ref #	Category	Objective	Project Condition/Type A Water Licence Condition	Related VEC	Associated Closure/Post-Closure Monitoring Program	IOL/Crown land	ICRP Ref
	Public Services – Policing	and its policing service are adequately prepared to handle any Project-related increases to the need for service and associated impacts.	for policing, and ensure that the Royal Canadian Mounted Police is prepared to handle ongoing Project-related demographic changes and subsequent crime prevention that may be needed as a result of the development, operation, and closure of the Project.	Infrastructure and public service	Monitoring Committee and the Closure Working Group closer to mine Closure		
162	Culture, Resources and Land Use – Public consultation	To ensure the ongoing and consistent involvement of Elders and community members in developing and revising monitoring and mitigation plans.	The Proponent should make all reasonable efforts to engage Elders and community members of the North Baffin communities in order to have community level input into its monitoring programs and mitigative measures, to ensure that these programs and measures have been informed by traditional activities, cultural resources, and land use as such may be implicated or impacted by ongoing Project activities.	N/A – Related to Cultural resources and Land use	Will be addressed by the Community Working Group and the Closure Working Group closer to mine Closure	Both	Section 9.10
163	Culture, Resources and Land Use – Public consultation	To involve communities in the development and evolution of management and monitoring plans.	The Proponent shall continue to engage and consult with the communities of the North Baffin region in order to ensure that Nunavummiut are kept informed about the Project activities, and more importantly, in order that the Proponent's management and monitoring plans continue to evolve in an informed manner.	N/A – Related to Cultural resources and Land use	Will be addressed by the Community Working Group and the Socio-Economic Monitoring Committee and the Closure Working Group closer to mine Closure	Both	Section 9.10
164	Socio-Economic Impacts – Shipping notification	In order to inform members of North Baffin communities of planned Project shipping transits such that community members' planned travel routing may be	The Proponent is required to provide notification to communities regarding scheduled ship transits throughout the regional study area including Eclipse Sound and Milne Inlet, real-time data regarding ships in transit and any changes to the proposed shipping schedule to the MEWG and agencies within Pond Inlet on a weekly	N/A – Related to Cultural resources and Land use	Part of already established Marine safety protocols on site and though IIBA Implementation.	Both	Section 9.10

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 237 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 12.3: NIRB Project Certificate Term and Conditions Concordance Table

Ref #	Category	Objective	Project Condition/Type A Water Licence Condition	Related VEC	Associated Closure/Post-Closure Monitoring Program	IOL/Crown land	ICRP Ref
		adjusted to avoid interaction with Project ships and/or ship tracks.	basis during open water shipping, and to the RSA communities on a monthly basis.				
165	Socio-Economic Impacts – Emergency shelters	In order to provide for human safety precautions in the event of adverse weather or other emergency situations along segments of linear transportation infrastructure.	The Proponent is strongly encouraged to provide buildings along the rail line and Milne Inlet Tote Road for emergency shelter purposes, and shall make these available for all employees and any land users travelling through the Project area. In the event that these buildings cannot, for safety or other reasons be open to the public, the Proponent is encouraged to set up another form of emergency shelters (e.g. seacans outfitted for survival purposes) every 1 kilometre along the rail line and Milne Inlet Tote Road. These shelters must be placed along Tote Road and rail routing prior to operation of either piece of infrastructure, and must be maintained for the duration of project activities, including the closure phase.	N/A	Part of already established Marine safety protocols on site. Will be addressed by the Community Working Group	Both	Section 9.10
166	Socio-Economic Impacts – Public Consultation	To ensure members of the public are able to access shipping information on an as-required basis in order to inform potential users of the scheduled Project activities which could require deviations to land users' schedules or routing.	The Proponent should ensure through its consultation efforts and public awareness campaigns that the public have access to shipping operations personnel for transits into and out of both Steensby Inlet port and Milne Inlet port either via telephone or internet contact, in order that any questions regarding ice conditions or ship movements that could assist ice users in preparing for travel may be answered by Project staff in a timely fashion.		Part of already established Marine safety protocols on site	Both	Section 9.10

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 238 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 12.3: NIRB Project Certificate Term and Conditions Concordance Table

Ref #	Category	Objective	Project Condition/Type A Water Licence Condition	Related VEC	Associated Closure/Post-Closure Monitoring Program	IOL/Crown land	ICRP Ref
168	Governance and Leadership – Monitoring program	Outline variables that are relevant to the Project and which should be adopted by the QSEMC's monitoring program.	The specific socioeconomic variables as set out in Section 8 of the Board's Report, including data regarding population movement into and out of the North Baffin Communities and Nunavut as a whole, barriers to employment for women, project harvesting interactions and food security, and indirect Project effects such as substance abuse, gambling, rates of domestic violence, and education rates that are relevant to the Project, be included in the monitoring program adopted by the Qikiqtani Socio-Economic Monitoring Committee.	N/A – Related to Governance and leadership	Will be addressed by the Socio-Economic Monitoring Committee closer to mine Closure	Both	Section 9.10
169	Governance and Leadership – Monitoring economic effects	To maintain transparency inform communities in relation to economic benefits associated with the Project.	The Proponent provide an annual monitoring summary to the NIRB on the monitoring data related to the regional and cumulative economic effects (positive and negative) associated with the Project and any proposed mitigation measures being considered necessary to mitigate the negative effects identified.	N/A – Related to Governance and leadership	Will be addressed by the Socio-Economic Monitoring Committee closer to mine Closure	Both	Section 9.10
175	Accidents and Malfunctions – Ship track markers in ice cover	To ensure that measures taken to mark the shipping track(s) during periods of ice cover are effective in advising ice-based travelers, and that, where necessary, revisions to this practice can be made	The Proponent shall, in coordination and consultation with the Qikiqtani Inuit Association and the Hunters and Trappers Organizations of the North Baffin communities and Coral Harbour, provide updates to its Shipping and Marine Mammals Management Plan to include adaptive management measures it proposes to take should the placement of reflective markers along the ship track in winter months not prove to be a feasible	N/A – Related to Marine Monitoring	Part of already established Marine safety protocols on site	Crown (Marine)	N/A

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 239 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 12.3: NIRB Project Certificate Term and Conditions Concordance Table

Ref #	Category	Objective	Project Condition/Type A Water Licence Condition	Related VEC	Associated Closure/Post-Closure Monitoring Program	IOL/ Crown land	ICRP Ref
		to ensure public safety.	method of marking the track to ensure the safety of ice-based travelers.				
177	Accidents and Malfunctions – Foreign flagged vessels	To ensure foreign flagged ships operating in Canadian waters are held to the same standard as domestic ships with regard to emergency response planning.	The Proponent shall enroll any foreign flagged vessels commissioned for Project-related shipping within Canadian waters into the relevant foreign program equivalent to Transport Canada's Marine Safety Delegated Statutory Inspection Program.	N/A – Related to Marine Monitoring	Part of already established Marine safety protocols on site	Crown (Marine)	N/A
180	Transboundary Effects – Makivik Corporation involvement in the Marine Environment Working Group	To enable Makivik Corporation and Nunavik communities near shipping lanes to remain informed and involved in those shipping activities which could affect the marine environment and marine mammals.	The Marine Environment Working Group established for this Project shall invite a representative from Makivik Corporation to be a member of the Group	N/A – Related to Marine Monitoring	Will be addressed in Annual Report. And in Marine Environmental Working Group	Crown (Marine)	N/A
181	Transboundary Effects – Marine Environment Working Group reporting	To enable Makivik Corporation and Nunavik communities near shipping lanes to remain informed and involved in those shipping activities which could affect the marine environment and marine mammals.	Regardless of whether Makivik Corporation participates as a member of the Marine Environment Working Group, the Marine Environment Working Group will provide Makivik Corporation with regular updates regarding the activities of the Marine Environment Working Group throughout the Project life cycle.	N/A – Related to Marine Monitoring	Will be addressed in Annual Report. And in Marine Environmental Working Group	Crown (Marine)	N/A
182	Transboundary Effects – Reporting to Marine Environment	To enable Makivik Corporation and Nunavik communities near shipping lanes to	Baffinland shall make available to Makivik Corporation any ship route deviation reports provided to the NIRB in accordance	N/A – Related to Marine Monitoring	Will be addressed in Annual Report. And in Marine Environmental Working Group	Crown (Marine)	N/A

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 240 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 12.3: NIRB Project Certificate Term and Conditions Concordance Table

Ref #	Category	Objective	Project Condition/Type A Water Licence Condition	Related VEC	Associated Closure/Post-Closure Monitoring Program	IOL/Crown land	ICRP Ref
	Working Group (MEWG)	remain informed and involved in those shipping activities which could affect the marine environment and marine mammals.	with the terms and conditions set out in Section 4.12.4 of the Final Hearing Report.				

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 241 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table 12.4 has been prepared to show concordance with Part J, Number 2 of the Type 'A' Water Licence, 2AM-MRY1325.

Table 12.4: Type 'A' Water Licence 2AM-MRY1325 Amendment No.1, Part J, Item 2

TYPE 'A' WATER LICENCE 2AM-MRY1325, Schedule J	ICRP Section
a. Detailed description, including maps and other visual representations, of the preconstruction conditions for each site, accompanied by a detailed description of the proposed final landscape, with emphasis on the reclamation of surface drainage over the restored area	3 & 5.2
b. A description of how progressive reclamation will be employed and monitored throughout the life of the mine, plus reclamation scheduling and coordination of activities with the overall sequence of the project; details of reclamation scheduling and procedures for coordinating reclamation activities within the overall mining sequence and materials balance	6
c. Implications of any updated water balance and water quality model prediction results and any adaptive management measures that may be required	5.2.1.9, 5.2.2.9, & Appendix D
d. An evaluation of closure and reclamation measures for each mine component, including the goals, objectives, closure criteria and the rationale for selection of the preferred measures	Table 5.1
e. A comprehensive assessment of materials suitability, including geochemical and physical characterization and a schedule of availability for reclamation needs. Particular attention shall be given to cover materials, including maps showing sources and stockpile locations of all reclamation construction materials	5.2.8.5.1
f. An assessment and description of any required post-closure treatment for pit water that is not acceptable for discharge, taking into consideration further studies completed and updated modeling information	5.2.1
g. Contingency measures for all reclamation components including action thresholds that are linked to the monitoring programs	5.1.1
h. Monitoring programs to assess reclamation performance and environmental conditions including monitoring locations for surface water and Ground Water, parameters	9
i. Monitoring schedules and overall timeframes	9
j. QA/QC procedures for managing the demolition landfill and other waste disposal areas	5.2.7
k. A list of non-salvageable materials and disposal locations	5.2.4, 5.2.5, & 5.2.7
l. Rock storage facility closure design plans and sections including the types of material placed and volumes	5.2.2

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 242 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

TYPE 'A' WATER LICENCE 2AM-MRY1325, Schedule J	ICRP Section
m. Protocol for the disposal of any contaminated soil;	Section 9.4
n. An assessment of the Long-term physical stability of all remaining project components;	Table 5.1
o. A revised closure and reclamation cost estimate; and	10.1
p. A detailed implementation schedule for completion of reclamation work	Table 5.1

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 243 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

13 GLOSSARY OF TERMS, ACRONYMS, OR ABBREVIATIONS

13.1 GLOSSARY OF TERMS

Term	Meaning
Abandonment	The permanent dismantlement of a facility so it is permanently incapable of its intended use. This includes the removal of associated equipment and structures.
Acid-Base Accounting (ABA)	Acid-Base Accounting (ABA) is a screening procedure whereby the acid-neutralizing potential and acid-generating potential of rock samples are determined.
Acid generating (AG)	Production of acidity irrespective of its effect on the adjacent pore water or whether the material is net acid producing or neutralizing.
Acid rock drainage (ARD)	Acidic drainage stemming from open pit, underground mining operations, waste-rock or tailings facilities that contains free sulphuric acid and dissolved metals sulphate salts, resulting from the oxidation of contained sulphide minerals or additives to the process. The acid dissolves minerals in the rocks, further changing the quality of the drainage water.
Acid Potential (AP)	Maximum potential acid generation from a sample. The calculation of AP (or MPA) is an integral part of acid/base accounting.
Acidity	Measure of the capacity of a solution to neutralize a strong base.
Active layer	The layer of ground above the permafrost which thaws and freezes annually.
Alkalinity	Measure of the capacity of a solution to neutralize a strong acid.
Backfill	Material excavated from a site and reused for filling the surface or underground void created by mining. Reinsertion of materials in extracted part(s) of the ore body. Materials used for backfilling can be waste-rock or overburden. In most cases backfill is used to refill mined-out areas in order to: - Assure ground stability. - Prevent or reduce underground and surface subsidence. - Provide roof support so that further parts of the ore body can be extracted and to increase safety. - Provide an alternative to surface disposal. And - Improve ventilation.
Background	An area near the site under evaluation not influenced by chemicals released from the site, or other impacts created by onsite activity.
Baseline	A surveyed condition and reference used for future surveys.
Benign	Having little or no detrimental effect.
Berm	A mound or wall, usually of earth, used to retain substances or to prevent substances from entering an area.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 244 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Term	Meaning
Best Management Practices	Any program, technology, process, operating method, measure, or device that controls, prevents, removes, or reduces pollution and impact on the environment.
Biodiversity	The variety of plants and animals that live in a specific area.
Bioremediation	The use of microorganisms or vegetation to reduce contaminant levels in soil or water.
Borrow Pit	A source of fill or embanking material.
Care and Maintenance	A term to describe the status of a mine when it undergoes a temporary closure.
Closure	When a mine ceases operations without the intent to resume mining activities in the future.
Closure Criteria	Detail to set precise measures of when the objective has been satisfied.
Closure Goal	The guiding statement that provides the vision and purpose of reclamation. Attainment of the closure goal happens all closure objectives have been satisfied. By its nature, the closure goal is a broad, high-level statement and not directly measurable.
Closure Principles	A fundamental basis for the selection of closure objectives.
Closure Objectives	Statements that describe what the selected closure activities are aiming to achieve; they are guided by the closure principles.
Comminution	Size reduction of an ore by crushing and/or grinding to such a particle size that the product is a mixture of relatively clean particles of mineral and gangue. In order to produce a relatively pure concentrate, it is necessary to grind the ore fine enough to liberate the desired minerals.
Contaminant	Any physical, chemical, biological or radiological substance in the air, soil or water that has an adverse effect. Any chemical substance with a concentration that exceeds background levels or which is not naturally occurring in the environment.
Contouring	The process of shaping the land surface to fit the form of the surrounding land.
Cumulative Effects	The combined environmental impacts that accumulate over time and space as a result of a series of similar or related actions or activities.
Crushing	Comminution process that reduces the particle size of run-of-mine ore to such a level that grinding can be carried out. This is accomplished by compression of ore against rigid surfaces, or by impact against surfaces in rigidly constrained motion path.
Cryoconcentration	Concentration of solutes due to exclusion by ice.
Decommissioning	Process by which a mining operation is shut down i.e.: permanently closing a site. Removing equipment, buildings and structures. Rehabilitation and plans for future maintenance of affected land and water are also included.
Dewatering	Process of removing water from an underground mine or open pit, or from the surrounding rock or non-lithified area. The term is also commonly used for the reduction of water content in concentrates, tailings and treatment sludges.

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 245 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Term	Meaning
Disposal	The relocation, containment, treatment or processing of unwanted materials or materials that are not reusable. This may involve the removal of contaminants or their conversion to less harmful forms.
Drainage	Manner in which the waters of an area exist and move, including surface streams and groundwater pathways. A collective term for all concentrated and diffuse water flow.
Drainage Chemistry	Concentrations of dissolved components in drainage, including element concentrations, chemical species and other aqueous chemical parameters.
Effluent	Treated or untreated liquid waste material that is discharged into the environment from a structure such as a settling pond or a treatment plant.
End Land Use	The allowable use of disturbed land following reclamation. Municipal zoning and/or approval may be required for specific land uses.
Environment	Interrelated physical, chemical, biological, social, spiritual and cultural components that affect the growth and development of living organisms.
Erosion	The wearing away of rock, soil or other surface material by water, rain, waves, wind or ice, the process may be accelerated by human activities.
Evaporation	Physical process by which a liquid is changed into a gas.
Existing Operation	An installation in operation or, in accordance with legislation existing before the date on which this Directive is brought into effect, an installation authorized or in the view of the competent authority the subject of a full request for authorization, provided that that installation is put into operation no later than one year after the date on which this Directive is brought into effect.
Frost Heave	Annual ground displacements and differential ground pressures due to the freezing of water within soils.
Geochemistry	Science of the chemistry of geological materials and the interaction between geological materials with the environment.
Geology	Study of the earth, its history and the changes that have occurred or are occurring, and the rocks and non-lithified materials of which it is composed and their mode of formation and transformation.
Grade	Dimensionless proportion of any constituent in an ore, expressed often as a percentage, grams per tonne (g/t) or parts per million (ppm).
Ground Thermal Regime	Temperature conditions below the ground surface. A condition of heat losses and gains from geothermal sources and the atmosphere.
Groundwater	All subsurface water that occurs beneath the water table in rocks and geologic formations that are fully saturated. Distinct from surface water.
Humidity Cell Test	Kinetic test procedure used primarily to measure rates of acid generation and neutralization in sulphide-bearing rock.
Hydrogeology	Science of the groundwater circuit (interrelationship of geologic materials and processes with water).

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 246 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Term	Meaning
Hydrology	The science that deals with water, its properties, distribution and circulation over the Earth's surface.
Inert Waste	Material having insignificant leachability and pollution content which will not require laboratory analysis.
Infiltration	Entry of water into a porous substance.
Inukshuk	A stone representation of a person, used as a milestone or directional marker by the Inuit of the Canadian Arctic.
In Situ Treatment	A method of managing or treating contaminated soils, sludges and waters "in place" in a manner that does not require the contaminated material to be physically removed or excavated from where it originated.
Landfill	An engineered waste management facility at which waste is disposed by placing it on or in land in a manner that minimizes adverse human health and environmental effects.
Leachate	Solution obtained by leaching e.g. water that has percolated through soil containing soluble substances and that contains certain amounts of these substances in solution.
Leaching	Passage of a solvent through porous or crushed material in order to extract components from the liquid phase. For example, gold can be extracted by heap leaching of a porous ore, or pulverized tailings. Other methods are tank leaching of ore, concentrates or tailings and in-situ leaching.
Lithology	Composition of rocks, including physical and chemical characteristics such as colour, mineralogical composition, hardness and grain size.
Migration	The movement of chemicals, bacteria, and gases in flowing water or vapour.
Mineral Resource	Concentration or occurrence of natural, solid, inorganic or fossilized organic material in or on the Earth's crust in such form and quantity and of such a grade or quality that it has reasonable prospects for economic extraction. The location, quantity, grade, geological characteristics and continuity of a Mineral Resource are known, estimated or interpreted from specific geological evidence and knowledge.
Mining	Methods and techniques to extract ore from the ground, including support facilities (e.g. stockpiles, workshops, transport, ventilation) and supporting activities in the mine itself or in the vicinity.
Mining Operation	Any extraction of ore from which mineral substances are taken, where the corporate intent is to make an operating profit or build continuously toward a profitable enterprise.
Mitigation	The process of rectifying an impact by repairing, rehabilitating or restoring the affected environment, or the process of compensating for the impact by replacing or providing substitute resources or environments.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 247 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Term	Meaning
Monitoring	Observing the change in geophysical, hydrogeological or geochemical measurements over time. Process intended to assess or to determine the actual value and the variations of an emission or another parameter, based on procedures of systematic, periodic or spot surveillance, inspection, sampling and measurement or another assessment methods intended to provide information about emitted quantities and/or trends for emitted pollutants.
Naturally Re-vegetate or Natural Re-vegetation	For the purposes of the Mary River Project natural re-vegetation will include scarification and covering with overburden as required and allowing the surrounding natural vegetation to encroach and be re-established on the disturbed area.
Neutralization	Raising the pH of acidic solutions or lowering the pH of alkaline solutions to near-neutral pH (about pH 7) values through a reaction in which the hydrogen ion of an acid and the hydroxyl ion of a base combine to form water.
Neutralization Potential (NP)	General term for a sample's or a material's capacity to neutralize acidity.
Objectives	Objectives describe what the reclamation activities are aiming to achieve. The goal of mine closure is to achieve the Long-term objectives that are selected for the site.
Open Pit Mining	Mining operation takes place on the surface. Mining operation and environment are in contact over an extended area.
Operator	Any natural or legal person that is responsible for the control, operation, and maintenance of the mine, mineral processing plant, tailings dam and/or related facilities including the after-closure phases.
Ore	Mineral or variety of accumulated minerals of sufficient value as to quality and quantity that it/they may be mined at a profit. Most ores are mixtures of extractable minerals and extraneous rocky material.
Orebody (mineral deposit)	Naturally occurring geological structure consisting of an accumulation of a desired mineral and waste-rock, from which the mineral can be extracted, at a profit, or with a reasonable expectation thereof.
Overburden	Layer of natural grown soil or massive rock on top of an orebody. In case of open pit mining operations it has to be removed prior to extraction of the ore
P	Phosphate
Passive Treatment	Treatment technologies that can function with little or no maintenance over long periods of time.
Permafrost	Ground that remains at or below zero degrees Celsius for a minimum of two consecutive years.
Permafrost Aggradation	A naturally or artificially caused increase in the thickness and/or area extent of permafrost.

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 248 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Term	Meaning
Permeability	The ease with which gases, liquids, or plant roots penetrate or pass through soil or a layer of soil. The rate of permeability depends upon the composition of the soil.
Phreatic Surface	The term phreatic is used in Earth sciences to refer to matters relating to ground water below the water table (the word originates from the Greek phrear, phreat- meaning “well” or “spring”). The term ‘phreatic surface’ indicates the location where the pore water pressure is under atmospheric conditions (i.e. the pressure head is zero). This surface normally coincides with the water table.
Potentially Acid Generating (PAG)	Rock or overburden material that has the potential to produce acidity irrespective of its effect on the adjacent pore water or whether the material is net acid producing or neutralizing.
Progressive Reclamation	Actions that can be taken during mining operations before permanent closure, to take advantage of cost and operating efficiencies by using the resources available from mine operations to reduce the overall reclamation costs incurred. It enhances environmental protection and shortens the timeframe for achieving the reclamation objectives and goals.
Primary Crushing	Process of reducing ore into smaller fragments to prepare it for further processing and/or so that it can be transported to the processing plant. In underground mines, the primary crusher is often located underground, or at the entrance to the processing plant.
Quarry	Whole area under the control of an operator carrying out any activity involved in the prospecting, extraction, treatment and storage of minerals, including common related infrastructures and waste management activities, being not a mine. It is distinguished from a mine because it is usually open at the top and front, and used for the extraction of building stone, such as slate, limestone, gravel and sand.
Reclamation	The process of returning a disturbed site to its natural state or one for other productive uses that prevents or minimizes any adverse effects on the environment or threats to human health and safety.
Rehabilitation	Activities to ensure that the land will be returned to a form and productivity in conformity with a prior land use plan, including a stable ecological state that does not contribute substantially to environmental deterioration and is consistent with surrounding aesthetic values.
Remediation	The removal, reduction, or neutralization of substances, wastes or hazardous material from a site in order to prevent or minimize any adverse effects on the environment and public safety now or in the future.
Restoration	The renewing, repairing, cleaning-up, remediation or other management of soil, groundwater or sediment so that its functions and qualities are comparable to those of its original, unaltered state.
Re-vegetation	Replacing original ground cover following a disturbance to the land.
Risk Assessment	Reviewing risk analysis and options for a given site, component or condition. Risk assessments consider factors such as risk acceptability, public perception of risk,

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 249 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Term	Meaning
	socio-economic impacts, benefits, and technical feasibility. It forms the basis for risk management.
Run-of-mine (ROM)	Run of mine. Unprocessed conveyed material (ore) from the mining operation.
Runoff	Part of precipitation and snowmelt that does not infiltrate but moves as overland flow and drains off the land into bodies of water.
Scarification	Seedbed preparation to make a site more amenable to plant growth.
Screening	Separating material into size fractions.
Security Deposit	Funds held by the Crown or designated owner of the land that can be used in the case of abandonment of an undertaking to reclaim the site, or carry out any ongoing measures that may remain to be taken after the abandonment of the undertaking.
Sediment	Solid material, both mineral and organic, that has been moved by air, water, gravity, or ice and has come to rest on the earth's surface either above or below sea level.
Seismic	Relating to an earthquake or to other tremors of the Earth, such as those caused by large explosions.
Solubility	Quantity of solute that dissolves in a given volume and type of solvent, at given temperature and pressure, to form a saturated solution. The degree to which compounds are soluble depends on their ability, and that of the other dissolved species, to form ions and aqueous complexes in particular drainage chemistry.
Sump	An underground catch basin in a mine where water accumulates before being pumped to the surface.
Supernatant	The clear liquid that floats about the sediment or precipitate.
Surface Water	Natural water bodies such as river, streams, brooks, ponds and lakes, as well as artificial watercourses, such as irrigation, industrial and navigational canals, in direct contact with the atmosphere.
Sustainable Development	Industrial development that does not detract from the potential of the natural environment to ensure benefits for future generations.
Tailings	Material rejected from a mill after most of the recoverable valuable minerals have been extracted.
Taliks	Unfrozen zones that can exist within, below, or above permafrost layers. They are usually located below deep water bodies.
Temporary Closure	When a mine ceases operations with the intent to resume mining activities in the future. Temporary closures can last for a period of weeks, or for several years, based on economical, environmental, political, or social factors.
Thermokarst	A landscape characterized by shallow pits and depressions caused by selective thawing of ground ice, or permafrost.
Topsoil	Natural huminous layer on top of the orebody, which has to be stripped prior to start-up of ore extraction.

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 250 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Term	Meaning
Traditional Knowledge	A cumulative, collective body of knowledge, experience, and values built up by a group of people through generations of living in close contact with nature. It builds upon the historic experiences of a people and adapts to social, economic, environmental, spiritual and political change.
Ultramafic	Igneous rock composed chiefly of mafic minerals, e.g. monomineralic rocks composed of hypersthene, augite, or olivine.
Waste-rock, Discard, or Spoil Material	All rock materials, except ore and tailings that are produced as a result of mining operations.
Watershed	A region or area bordered by ridges of higher ground that drains into a particular watercourse or body of water.
Water Table	The level below where the ground is saturated with water.
Weathering	Processes by which particles, rocks and minerals are altered on exposure to surface temperature and pressure, and atmospheric agents such as air, water and biological activity.

13.2 ACRONYMS AND ABBREVIATIONS

The following are acronyms or abbreviations that may be used in this document:

Abbreviation	Description
General	
A&R	Abandonment and Reclamation
ARD	Acid Rock Drainage
Baffinland	Baffinland Iron Mines Corporation
CCME	Canadian Council of Ministers of the Environment
DEIS	Draft Environmental Impact Statement
EA	Environmental Assessment
EHS	Environmental Health and Safety
EIS	Environmental Impact Statement
EMMP	Environmental Mitigation and Monitoring Plans
ERP	Proposed Early Revenue Phase
ESA	Environmental Site Assessment
FEIS	Final Environmental Impact Statement
FOL	Federal Owned Lands
Ga	Giga-annum (billion years)
HADD	Harmful Alteration, Disruption, or Destruction
HTA/HTO	Hamlets, Hunters, and Trappers Association/Organization
HTO	Hunters and Trappers Organization
ICRP	Interim Closure and Reclamation Plan
IIBA	Inuit Impact and Benefits Agreement
IOL	Inuit Owned Lands
IQ	Inuit Qaujimajatuqangit (Inuit knowledge, or traditional knowledge)
KI	Key Indicator

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 251 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Abbreviation	Description
LAC	Land Advisory Committee
LSA	Local Study Area
MASL	Metres above Sea Level
Mary River	Nuluujaak
MDAG	Mineral Development Advisory Group
MERA	Mineral and Energy Resource Assessment
ML	Metal Leaching
MOU	Memorandum of Understanding
Mtpa	Million Tonne-Per-Annum
NLCA	Nunavut Land Claims Agreement
NSA	Nunavut Settlement Area
NWT	Northwest Territories
PAG	Potential Acid Generating
PCRPP	Preliminary Closure and Reclamation Plan
PDA	Potential Development Area
PDW	Pre-Development Works
PLA	Production Lease Area
PPR	Personal Property Registry
RA(s)	Responsible Authority(ies)
RMO	Resource Management Officer
RSA	Regional Study Area
TC-NWPP	Transport Canada Navigable Waters Protection Program
the Project	Mary River Project
TK	Traditional Knowledge
VC	Valued Component
VEC	Valued Ecosystem Component
VSEC	Valued Socio-Economic Component
Federal and Territorial Acts	
AWPPA	Arctic Waters Pollution Prevention Act
BCANU	Business Corporations Act (Nunavut)
CEAA	Canadian Environmental Assessment Act
CEPA	Canadian Environmental Protection Act, 1999
CLA	Commissioner's Land Act
CNPA	Canada National Parks Act
CWA	Canada Wildlife Act
EG&GANU	Engineers, Geologists and Geophysicists Act (Nunavut)
EMAANU	Emergency Medical Aid Act (Nunavut)
EPANU	Environmental Protection Act (Nunavut)
EUANU	Explosives Use Act (Nunavut)
EXA	Explosives Act
FA	Fisheries Act
FPANU	Fire Prevention Act (Nunavut)
LSANU	Labour Standards Act (Nunavut)
MBCA	Migratory Birds Convention Act, 1994
MH&SANU	Mine Health and Safety Act (Nunavut)

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 252 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Abbreviation	Description
NW&NSRTA	Nunavut Waters and Nunavut Surface Rights Tribunal Act
PHANU	Public Health Act (Nunavut)
TDGA	Transportation of Dangerous Goods Act, 1992
TDGANU	Transportation of Dangerous Goods Act (Nunavut)
TLA	Territorial Lands Act
TPANU	Territorial Parks Act (Nunavut)
WANU	Wildlife Act (Nunavut)
WCANU	Workers' Compensation Act (Nunavut)
<i>Federal and Territorial Regulations</i>	
AWPPR	Arctic Waters Pollution Prevention Regulations
CFAEAP&R	Regulations Respecting the Coordination by Federal Authorities of Environmental Assessment Procedures and Requirements
CLR	Commissioner's Land Regulations
CMR	Canada Mining Regulations
CRFR	AECB Cost Recovery Fees Regulations, 1996
CSLR	Comprehensive Study List Regulations
CSLRNU	Comprehensive Study List Regulations (Nunavut)
CSRNU	Camp Sanitation Regulations (Nunavut)
ELR	Exclusion List Regulations
EURNU	Explosives Use Regulations (Nunavut)
EXR	Explosives Regulations
FPRNU	Fire Prevention Regulations (Nunavut)
ILR	Inclusion List Regulations
LLR	Law List Regulations
MBSR	Migratory Bird Sanctuary Regulations
MH&SRNU	Mine Health and Safety Regulations (Nunavut)
MDMER	Metal and Diamond Mining Effluent Regulations
NA&PSR	Nunavut Archaeological and Palaeontological Sites Regulations
NBRLUP	North Baffin Regional Land Use Plan
NPWR	National Parks Wildlife Regulations
NWTFR	Northwest Territories Fishery Regulations
NWTWR	Northwest Territories Waters Regulations
PCSRNU	Propane Cylinder Storage Regulations (Nunavut)
SCP&RRNU	Spill Contingency Planning and Reporting Regulations (Nunavut)
TDGR	Transportation of Dangerous Goods Regulations
TDGRNU	Transportation of Dangerous Goods Regulations (Nunavut)
TDR	Territorial Dredging Regulations
TLR	Territorial Lands Regulations
TLUR	Territorial Land Use Regulations
TPRNU	Territorial Parks Regulations (Nunavut)
TQR	Territorial Quarrying Regulations
WAR	Wildlife Area Regulations
WCRNU	Workers' Compensation Regulations (Nunavut)
WSRNU	Wildlife Sanctuaries Regulations (Nunavut)
<i>Federal Government Departments and Agencies</i>	

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 253 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Abbreviation	Description
AANDC	Aboriginal Affairs and Northern Development Canada
CTA	Canadian Transportation Agency
DFO	Fisheries and Oceans Canada
DOJ	Department of Justice Canada
EC	Environment Canada
CIRNAC	Crown Indigenous Relations and Northern Affairs Canada, formerly Indian and Northern Affairs Canada (INAC) and prior to that Aboriginal Affairs and Northern Development Canada (AANDC)
NRCan	Natural Resources Canada
PCH	Parks Canada Agency (Canadian Heritage)
TC	Transport Canada
<i>Territorial Government Departments and Agencies</i>	
CGSNU	Department of Community and Government Services
CLEYNU	Department of Culture, Language, Elders and Youth
DOJNU	Department of Justice
DOENU	Department of Environment
ED&TNU	Economic Development & Transportation
GN	Government of Nunavut
H&SSNU	Department of Health and Social Services
WSCC	Workers Safety and Compensation Commission of the Northwest Territories and Nunavut
<i>Institutions Of Public Government</i>	
CLARC	Community Land and Resource Committee
CLO	Community Liaison Officer
IPGs	Institutions of Public Government
MVLWB	Mackenzie Valley Land and Water Board
NIRB	Nunavut Impact Review Board
NPC	Nunavut Planning Commission
NSRT	Nunavut Surface Rights Tribunal
NWB	Nunavut Water Board
NWMB	Nunavut Wildlife Management Board
<i>Inuit Organizations</i>	
DIO	Designated Inuit Organizations
MHTO	Mittimatalik Hunters and Trappers Organization
NTI	Nunavut Tunngavik Incorporated
QIA	Qikiqtani Inuit Association
RIA	Regional Inuit Association
RWO	Regional Wildlife Organization

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 254 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

14 REFERENCES

- AANDC. 2007. Mine Site Reclamation Guidelines for the Northwest Territories, prepared by Indian and Northern Affairs Canada, dated January 2007.
- Aker Kvaerner. 2008. Definitive Feasibility Study Report Mary River Iron Ore Project Northern Baffin Island, Nunavut.
- AMEC. 2010. Interim Report on ML/ARD Characterization Mary River Project, Deposit No. 1, dated December 2010, prepared by AMEC Earth & Environmental.
- AMEC. 2010. Technical Memorandum to: Greg Wortman and Doron Golan, Re: Baffinland Mary River Project – Trucking Feasibility Study, Interim ML/ARD Assessment of Tote Road Quarry and Borrow Pit Samples, dated December 10. Project No. TC101510, File No. 017.
- AMEC. 2014. Technical Memorandum to: Jim Millard, Baffinland (from Steve Walker, AMEC). RE: Mary River Deposit 1, 5-Year Pit ML/ARD Characterization, Rev. 1 - Issued for Phase 1, WRMP. April 28.
- AMEC. 2017. Memo TC170202, dated May 15.
- Baffinland. 2011. 2011 Abandonment and Reclamation Plan, prepared by Baffinland Iron Mines Corporation, dated March, 2011.
- Baffinland. 2012. Final Environmental Impact Statement, prepared by Baffinland Iron Mine Corporation, dated February 2012
- Baffinland. 2013. Mary River Project - Addendum to Final Environmental Impact Statement, prepared by Baffinland Iron Mine Corporation, dated June 2013.
- Baffinland. 2015. Baffinland Iron Mines Corporation, Sustainable Development Policy (September 2015).
- Baffinland. 2018. Mary River Project—Phase 2 Proposal. Addendum to the Final Environmental Impact Statement. Prepared by Baffinland Iron Mine Corporation, dated August 2018. NIRB File No. 08MN053.
- COSEWIC (Committee on the Status of Endangered Wildlife in Canada). 2010. COSEWIC Species Status Reports. Environment Canada, Ottawa, Ontario (cosewic.gc.ca).
- DFO. 2010. Protocol for Winter Water Withdrawal from Ice-covered Waterbodies in the Northwest Territories and Nunavut.
- Environment Canada. 2010. Species at Risk Act (SARA) (www.sararegistry.gc.ca).
- Ferguson Simek Clark, Engineers & Architects. 2003. Guidelines for the Planning, Design, Operations and Maintenance of Modified Solid Waste Sites in the NWT. FSC Project No: 2001-1330. Prepared for

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 255 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

The Department Municipal and Community Affairs, Government of the Northwest Territories. April 21, 2003. https://www.enr.gov.nt.ca/sites/enr/files/guidelines/solidwaste_guidelines.pdf

Golder Associates Limited. 2018. Interim Waste Rock Management Plan, Mary River Project, dated March 29, 2018.

Hatch Ltd. 2017. Project Memo. Re: Baffinland Iron Mines Corporation – Mary River Project – Geotechnical Investigations – Acid Rock Drainage Assessment, dated September 6. Ref. No. H353004.

Hatch Ltd. 2018. Baffinland Iron Mines Corporation – Mary River Expansion Project – 2016/2017 Rail Geotechnical Investigation Factual Data Report, dated May 22. Ref. No. H352034-10000-229-230-0005.

INAC. 1992. Mine Reclamation in Northwest Territories and Yukon, prepared by Steffen Robertson and Kirsten (B.C.) Inc. for Indian and Northern Affairs Canada, dated April 1992.

INAC. 2002a. Mine Site Reclamation Policy for the Northwest Territories, prepared by Indian and Northern Affairs Canada, dated 2002.

INAC. 2002b. Mine Site Reclamation Policy for Nunavut, prepared by Indian and Northern Affairs Canada, dated 2002.

Intergovernmental Panel on Climate Change. 2007. Climate Change 2007: Synthesis Report

Knight Piésold. 2008. Mary River Project - Estimated Time for Open Pit to Fill with Water, September 2008, prepared by Knight Piésold.

Minnow Environmental Inc. 2016. Mary River Project 2015 Core Receiving Environment Monitoring Program Report. Prepared for Baffinland Iron Mines Corp. March 2016.

Minnow Environmental Inc. 2017. Mary River Project 2016 Core Receiving Environment Monitoring Program Report. Prepared for Baffinland Iron Mines Corp. March 2017.

National Research Council. 1998. The Canadian System of Soil Classification, prepared by the Soil Classification Working Group, Research Branch of Agriculture and Agri-Food Canada, Third Edition.

MVLWB/AANDC. 2013. Guidelines for the Closure and Reclamation of Advanced Mineral Exploration and Mine Sites in the NWT, prepared by Mackenzie Valley Land and Water Board & Aboriginal Affairs and Northern Development Canada, dated November 2013.

NIRB. 2009. Guidelines for the Preparation of an Environmental Impact Statement for Baffinland Iron Mines Corporation's Mary River Project, prepared by Nunavut Impact Review Board, dated November 2009.

NWTWB. 1990. Guidelines for Abandonment and Restoration Planning for Mines in the Northwest Territories, prepared by Northwest Territories Water Board, dated September 1990.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 256 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

NRCan (Natural Resources Canada). 1994. The Whitehorse Mining Initiative Leadership Council Accord Final Report (October 1994).

Parks Canada. 2018. Where is the Tallurutiup Imanga? <https://www.pc.gc.ca/en/amnc-nmca/cnamnc-cnmca/tallurutiup-imanga/emplacement-location>

Qikiqtani Inuit Association (QIA). Community Profiles. Last accessed (09/05/2006). <<http://www.qikiqtani.nu.ca/english/communications-community-profiles.html>>.

QIA. 2013. Abandonment and Reclamation Policy for Inuit Owned Lands (v3), May 2013. Prepared by Qikiqtani Inuit Association.

Veldhuis, Hugo. 2010. Mary River Project, Soils Report Part I, Soils, Landscapes and their Properties. Winnipeg Manitoba, 2010.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 257 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Appendix A

Preliminary Mine Closure and Reclamation Plan Drawings

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 258 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Figures page holder 1 of 11

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 259 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Figures page holder 2 of 11

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 260 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Figures page holder 3 of 11

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 261 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Figures page holder 4 of 11

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 262 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Figures page holder 5 of 11

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 263 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Figures page holder 6 of 11

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 264 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Figures page holder 7 of 11

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 265 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Figures page holder 8 of 11

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 266 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Figures page holder 9 of 11

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 267 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Figures page holder 10 of 11

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 268 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Figures page holder 11 of 11

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 269 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Appendix B **Mine Closure and Reclamation Planning** **Guidelines, Regulations and** **Lease Requirements**

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 270 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

The following tables provide cross-referencing to where responses to key Mine Closure and Reclamation Planning guidelines, regulations or lease requirements can be found in this document. The referenced section of this ICRP provides an outline, at a conceptual level, of how the proponent plans to address the particular requirement.

Table B-1: Territorial Lands Act

Territorial Land Use Regulations (TLUR 2010)		
Key Mine Closure and Reclamation Plan Guidelines	TLUR Section	ICRP (Section)
All closure work shall be carried out in accordance with permit requirements as stated in the <i>Territorial Land Use Regulations</i> .	s. 8 through 10, 31	2.6
"Subject to the terms and conditions of his permit or the express written authority of an inspector, every permittee shall replace all materials removed by him in the course of excavating, other than rock trenching, and shall level and compact the area of excavation."	s. 12	Table 5.1
"Restore the channel and bed of the stream to their original alignment and cross-section."	s. 13.(1 b)	Table 5.1
"Subject to the terms and conditions of his permit, every permittee shall, after completion of a land use operation, restore the permit area as nearly as possible to the same condition as it was prior to commencement of the land use operation."	s. 18	Table 5.1
Remove all buildings equipment, machinery, and storage equipment/containers and materials onsite.	s. 19.(1)	5.2.4
A final plan will be issued to the "engineer" within 60 days following completion of the land use operation or expiration of the permit.	s. 33	2.3.1.4
All plan drawings shall be: • Drawn to scale that clearly illustrates all mine features. • Shows the scale on the drawing. and • Provide geographic co-ordinates.	s.35	Appendix A
"In order to ensure that a permittee complies with the terms and conditions of his permit with these Regulations, the engineer may include in the permit a condition that the permittee deposit with the Minister a security deposit not exceeding \$100,000."	s. 36	10

Table B-2: Nunavut Impact Review Board

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 271 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Guidelines for the Preparation of an Environmental Impact Statement for Baffinland Iron Mines Corporation's Mary River Project (2009)	
Key Mine Closure and Reclamation Plan Guidelines	ICRP (Section)
"To ensure that issues associated with the effective closure and reclamation of all Project Components is considered at the earliest possible stage in the mine development process, thereby influencing mine design to take into account environmental issues related to mine closure and reclamation."	All
"To establish major targets for reclamation of lands potentially affected by the Project."	Table 5.1
"Description of reclamation methods, time frames and schedules, including proposed notice periods to employees and public."	5
"Description of temporary closure measures and a discussion of at what point a temporary closure should be considered permanent for the purposes of requiring implementation."	0
"Discussion of research programs to address challenges to reclamation, given the local conditions."	Appendix D
"Considerations for the Projection of public health and safety."	7.1.1, & 7.3.1
"Description of closure and post - closure monitoring of environmental components."	9
"Discussion of the need for long - term monitoring and maintenance by establishing physical and chemical stability."	9
"Discussion on reduction or elimination of environmental effects once the mine ceases operation."	Table 5.1 & 9
"Discussion regarding re-establish conditions that permit the land to return to similar pre-mining land use."	Table 5.1 & 5.1.1
"Consideration for ML/ARD potential of rocks, in association with related waste rock management strategies."	5.2.1.9 & 5.2.2.7
"Any considerations for the restoration of the natural aesthetics of the Project."	Table 5.1

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 272 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table B-3: AANDC (CIRNAC) Guidelines

Mine Site Reclamation Guidelines for the Northwest Territories (2007)	
Key Mine Closure and Reclamation Plan Guidelines	ICRP Report Section
Develop and implement preventive and control strategies to effectively minimize the potential for ARD and ML to occur.	5.2.2
Where ARD and ML are occurring as a result of mine activities, mitigate and minimize impacts to the environment.	5.2.1.9 & 5.2.2.9
Re-establish the pre-mining ground cover, which may involve encouraging self-sustainable indigenous vegetation growth.	5
Remediate any sources of contamination that may have been created during the development and operation of the mine site in order to protect humans, wildlife, and environmental health.	Table 5.1
Ensure physical stability of residual earth structures for environmental, human, and wildlife safety.	Table 5.1
Open Pit: - Minimize access to protect human and wildlife safety. - Implement water management strategies to minimize and control migration and discharge of contaminated drainage, and if required, collect and treat contaminated water. - Stabilize slopes to minimize erosion and slumping.	5.2.1
Waste Rock: Minimize erosion, thaw settlement, slope failure, collapse or the release of contaminants or sediments.	5.2.2
Buildings and infrastructure, equipment: Return area to its original state or to a condition compatible with the end land-use targets.	5.2.4
Restore natural drainage patterns where surface infrastructure has been removed.	Table 5.1
Landfills: Control erosion and effects to the ground thermal regime.	5.2.7
Water Management Systems: - Dismantle and remove/dispose of as much of the system as possible and restore natural or established new drainage patterns. - Stabilize and protect from erosion and failure for the long term.	Table 5.1 & 5.2.8

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 273 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table B-4: AANDC (CIRNAC) Policies

Mine Site Reclamation Policy for Nunavut (2002) and Mine Site Reclamation Policy for the Northwest Territories (2002)	
Key Mine Closure and Reclamation Plan Guidelines	ICRP Report Section
Areas should be returned to viable and self sustaining areas where practical.	5.1.1
Use best management principles such as progressive reclamation and reduce the environmental risk.	6
Communication and consultation shall be undertaken with all applicable parties.	2.3.1.3 & 2.4
Closure impacts for all mine components.	Table 5.1
Closure costs estimates should be undertaken by a third party using a recognized methodology such as RECLAIM. Closure cost estimates should include contingency factors.	10
Inclusion of a progressive reclamation plan.	6
Removal/stabilization of all structures.	5.2.4 & 5.2.5
Reclaim and stabilize waste rock stockpiles remaining on site.	5.2.2
Reclaim the disturbed surface areas to acceptable standards.	Table 5.1
Water quality at closure shall meet or exceed the accepted standards.	Table 5.1
Temporary Closure measures shall be included in the Preliminary Closure Plan and cost estimate.	7
Inclusion of a post - closure monitoring program.	9
Detailed closure and decommissioning of the following: • Buildings and other structures. • Roads. • Airstrips. • Waste rock stockpiles. • Ore stockpiles • Quarries. • Open pit. • Petroleum and chemical storage areas and facilities. • Pipelines. • Power corridors. • Sewage and waste disposal areas and Mine drainage.	5.2
Re-vegetation of the site where practical.	5
Meet or exceed applicable water standards.	Table 5.1
Recycle materials where practical.	5.2.7
Closure cost estimate to be calculated for the total financial security for final closure.	10
Utilization of a recognized methodology for calculating the closure costs (i.e. RECLAIM model).	10

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 274 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Mine Site Reclamation Policy for Nunavut (2002) and Mine Site Reclamation Policy for the Northwest Territories (2002)	
Key Mine Closure and Reclamation Plan Guidelines	ICRP Report Section
Establish financial security to be provided to the Minister of Aboriginal Affairs and Northern Development Canada (previously Indian Affairs and Northern Development).	10

Table B-5: AANDC (CIRNAC) Guideline

Mine Reclamation in the Northwest Territories and Yukon (1992)	
Key Mine Closure and Reclamation Plan Guidelines	ICRP Report Section
Preliminary Closure Plan objectives are to: • Protect the public health and safety. • Prevent and/or reduce the environmental deterioration. • Return all disturbed areas to the original state or an accepted level of reclamation.	N/A
Ensure post-closure physical and chemical stability.	5.1.1
Development of a monitoring program to assess the effectiveness of the restoration to be undertaken between the Proponent and Indian and Northern Affairs Canada.	9
Reclaimed areas should be returned to previous land use and aesthetics, to the extent possible.	Table 5.1
Include temporary closure and indefinite (long-term) Preliminary Closure Plans.	7
Mine features should be closed in accordance with the guidelines provided in Tables 5.2 through Table 5.8 (Robertson and Kirsten 1992).	5
Inclusion of a fully developed closure cost estimate.	10
Re-vegetation where practical. Local arctic species and distributions should be considered.	5.2

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 275 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table B-6: Northwest Territories Water Board Guidelines

Guidelines for Abandonment and Restoration Planning for Mines in the Northwest Territories (1990)	
Key Mine Closure and Reclamation Plan Guidelines	ICRP Plan Report Section
Evaluation of ML/ARD potential for open pit, waste rock stockpiles and disturbed areas.	5.2.1 & 5.2.2 (ongoing process)
Cover design for waste rock stockpiles, if required. Stockpiles should be designed and contoured to ensure stability.	5.2.2
Re-vegetation of disturbed areas, where practical.	5.2
Open pit closure preferably backfilling or flooding.	5.2.1
Stability of open pit should be investigated.	5.2.1
Quarries should be backfilled and contoured to match the surrounding topography.	5.2.3
Removal of fuel and chemical storage tanks and associated piping and plumbing if applicable.	5.2.7
Fuel contaminated soils should be remediated.	5.2.7 & 9.4
Chemical storage facilities should be removed from site.	7.1.5 & 7.3.5
Soils surrounding chemical facilities should be tested for contamination and where present be removed from site.	9.4
Culverts should be removed from site.	5.2.8
Airstrips should be left intact, unless deemed unsafe.	5.2.6
Natural drainage should be restored to the site. Roads that do not impede the natural drainage may remain intact.	5.2.6 & 5.2.8
Solid wastes should be dealt with in responsible manner.	5.2.7
Hazardous wastes are to be disposed at an approved facility.	5.2.7
Buildings and structures should be removed from the site.	5.2.4
Concrete foundations may be left in a safe condition.	5.2.4
The Preliminary Closure Plan should include a planned shutdown/temporary closure scenario.	7.1
The Preliminary Closure Plan should include a long-term shutdown/Long-term Closure scenario.	7
The Preliminary Closure Plan should include a final abandonment/final closure scenario.	5
It is encouraged that site closure include phased plan development (progressive closure).	6
A monitoring program should be devised to measure the effectiveness of the site closure.	9
Financial security is required for the closure phase.	10

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 276 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Appendix C

Site Photos of Current Site Condition (2017/2018)

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 277 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Mary River Mine Site

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 278 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	



Mary River Mine Site – View South



Mary River Mine Site – Close-up of Accommodations Complex and Tank Farm

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 279 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	



Mary River Mine Site – View West of Accommodation Complex and Tank Farm



Mary River Mine – 800 Person Camp (September 2018)

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 280 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	



Mary River Mine

Mary River Mine (September 2018)

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 281 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	



Waste Rock Facility, facing northeast

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 282 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Milne Port

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 283 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	



Milne Port – View South



Milne Port – View Southeast

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 284 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	



Milne Port – View Northwest



Close-up of Milne Port Tank Farm and Ore Stockpiles

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 285 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Tote Road

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 286 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	



Tote Road Water Crossing



Tote Road

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 287 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Steensby Camp

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 288 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	



Steensby Camp – View Northwest

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 289 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Mid-Rail Camp

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 290 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	



Mid Rail Camp – View West

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 291 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Appendix D Reclamation Research Plans

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 292 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

The following is an overview of the reclamation research plans that are proposed to reduce uncertainties associated with closure planning. Progress updates for these research programs will be provided in standalone reports that will be included within each following ICRP submission. In addition to the individual research program objectives, a summary of planned research tasks and timelines and findings from completed work to date are included in this Appendix.

Research plans described below have been identified by BIM and/or stakeholders as key topics of uncertainty and/or risk with respect to closure. Research tasks may focus on confirming and/or refining initial predictions for residual effects, improving understanding on what achievable levels of reclamation success are to inform closure criteria, and developing site-specific closure techniques or other efforts needed to address notable gaps in advancing the ICRP to a final closure design.

Additional research plans may be included in future ICRPs as appropriate. New plans will be considered by BIM and project stakeholders as the project advances and uncertainties relating to closure arise. Baffinland implements a robust collection of monitoring programs, which include reporting components for stakeholder review and the opportunity to present questions/concerns related to closure. In particular, the NIRB Annual Monitoring Report is developed to assess the accuracy of predictions contained in the Project's environmental impact statements. This submission allows for comment by Project stakeholders and is followed closely by Baffinland's closure planning staff to identify environmental changes during mining that could impact the adequacy of the existing ICRP. Tracking and understanding of project impacts/effects is a focus of the MEWG and the TEWG, who will communicate findings/discussions with the MCWG. These regulatory reporting requirements and working groups provide a mechanism for identifying key uncertainties for closure and assessing the need for new research topics. Recommendations from the MEWG, TEWG and the various regulatory stakeholders will be assessed by the MCWG, which will provide final recommendations on the reclamation research programs.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 293 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

D.1 Reclamation Research Program - Open Pit Runoff Water Quality

Background

At the end of mining, the open pit will gradually fill with water from precipitation; time is estimated at 85 to 150 years, depending on annual precipitation, evaporation and other factors (Knight Piésold, 2008). Baffinland has since committed to reducing this time period using alternatives for enhanced flooding of the open pit (addressed under the “Open Pit Flooding Timeline” research program).

AMEC (2012c) developed water quality estimates for pit water for the final year of mining (Year 21), which were utilized as input in the water quality mass loading model under the assumption that, once the pit has filled, in each subsequent (post-closure) year all precipitation into the open pit will accumulate and that excess water will discharge via a spillway during the open water period according to the natural hydrograph.

The mass loading modelling indicated that Level I magnitude effects to water quality will occur under low flow conditions, with a calculated HQ between 1 and 10 for mercury, selenium and silver. It is noted that an HQ >10 was calculated for mercury within the F0 tributary, upstream of fish presence or habitat; however, since the assessment of water and sediment quality is based on fish as the receptor, the effects assessment considers the resultant water quality at fish habitat within the Mary River, where all parameters have an HQ value less than 10.

Based on pit water quality for Year 21 of mining, it is possible the water will have a pH of around 4.2, which is outside of the pH range of the MDMER (6.0 to 9.0) however the mass loading modelling carried out is based on conservative assumptions and Baffinland is continuing to study the geochemistry of waste rock and ore to further refine predictions and management plans.

Uncertainty

Due to the early stage of project development and the fact only conceptual geochemical modelling (mass loadings assessment) has been completed to date, there is uncertainty with respect to the Open Pit water quality predictions.

Inflows to the open pit include: direct precipitation, runoff, groundwater inflow, and any enhanced flooding flows. Outflows include evaporation/sublimation, groundwater seepage discharge, and overflow discharge (once fully flooded). Chemistry of water in the open pit will be influenced by both the chemistry of the inflows, as well as the pit walls, residues from the mining process (blasting, etc.), and seasonal or temporary stratification of the water column into waters of differing chemistry and temperature (such as a chemocline or thermocline) that may be affected by bathymetry, climatic conditions, quality and temperature of inflows, wind, influence of permafrost, ice over (formation) and ice off (melting).

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 294 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Research/Study Objective

This research plan aims to:

- improve predictions for water quality within the open pit during flooding operations and to inform decision making with respect to enhanced flooding alternatives, and
- to improve long-term water quality predictions for open pit (pit lake) effluent flows with respect to meeting applicable closure objectives and criteria in Post-Closure, and to assess the effectiveness of water treatment options in modifying Open Pit runoff water quality, if necessary.

Overview of Tasks and Project Research Schedule

The following are an overview of the anticipated tasks required to obtain the study objectives; the objectives are general in nature and not explicitly linked to the tasks below. An indication on status of each task is provided and when warranted, anticipated commencement and/or conclusion dates.

Task 1 – Pit Lake Miromixis

Deep pit lakes are often subject to a stratification of the water column into waters of differing chemistry typically due to strong density gradients within the water due to salinity or temperature. While permeant stratification of the pit lake can result in the long-term storage of salts within the pit, a seasonal turnover of the lake could result in poor water quality conditions at certain times of the year.

Based on the predicted water quality within the lake and data collected from the site weather station, an assessment will be carried out to evaluate if the pit lake will likely be meromictic or if it will become seasonally stratified. In support to this evaluation, a focused review of scientific literature relating to meromictic pit lakes in cold regions should be carried out. Further, analyses of the temperature gradients, wind conditions, precipitation, groundwater inflows, and other conditions will be carried out as site conditions allow (i.e. presence of an open pit) to evaluate the likelihood of the pit lake becoming stratified and subsequently becoming mixed.

Task 2 – Water Monitoring and Comparison against Water Quality Predictions

The quality and flow of key inflows to the open pit should be monitored (or otherwise estimated) and compared against water quality predictions.

It is, however, not advised that runoff from the pit walls is used as an analogue for future water quality in the open pit. The chemistry of the pit wall runoff will differ from the longer-term pit wall runoff with respect to the proportions of various rock types that comprise the pit walls, the degree of weathering of those faces, and that samples will likely be impacted by other (potentially significantly larger) open pit inflows.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 295 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Should the measured chemistry or flow of any of the key pit inflows deviate significantly from predicted values over a 5-year basis, the water quality prediction model will be updated in light of the results of water quality modelling, and updates to the mine plan or geochemical analyses.

Task 3 – Update Water Quality Predictions

As per above (Task 2), the predictive water quality model will be updated not later than 5 years prior to the planned cessation of mining operations. In addition to evaluating the long-term water quality of the flooded open pit (pit lake), the effects of mine flooding rates will be considered with regards to the short-term water quality of the pit lake (at initial discharge).

Task 4 – Water Treatment Options Analysis

Water treatment alternatives will be considered if it is found that the predicted water quality in the Pit Lake (at initial discharge, or long term) is not anticipated to meet effluent water quality.

Table D-1: Overview of Tasks for Reclamation Research - Open Pit Runoff Water Quality

Task	Reference Document	Status Anticipated Start and/or End Date
Establish initial water quality predictions and review relevant baseline conditions	FEIS Volume 7, Section 3.4	Completed (2013)
- Conduct literature review and analyze long-term predicted conditions to assess if permanent meromictic conditions are anticipated. - Should long-term meromictic conditions be anticipated, this characteristic should be incorporated into the open pit predictive water quality model. - Should it be possible to create long-term permanent meromictic conditions in the open pit, designs should be developed so that these measures could be incorporated into the ICRP if justified.	N/A	2019-2020
- Monitor water quality within the open pit, runoff to the open pit, groundwater surrounding the open pit, and other inflows to the open pit. Water quality data should be compared against the assumptions made in the initial water quality predictions. - The water quality predictive model should be assessed for updating on the basis of findings every 5-years, in the event that unexpected water quality conditions are encountered - Follow up investigation of unknown sources of contaminants may be required.	N/A	Onset of open pit dewatering activities to Life of Project

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 296 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Task	Reference Document	Status Anticipated Start and/or End Date
Results and collected data are to be presented in the research program progress reports.		
- Not less than 5 years prior to the end of operations, the water quality predictive model will be updated and predicted water quality should be compared against the criteria set out in Table 5.1. - Modelling will include an assessment of the influence of filling time on open pit water chemistry. (<i>Reclamation Research Program: Open Pit Flooding Timeline</i>) - Should additional humidity cell data become available, the results of these analyses will be incorporated into the geochemical aspects of the water quality model.	N/A	Five years prior to Life of Project (duration 1 year)
If required, suitable contingencies should be identified and assessed for addressing long-term water quality.	N/A	One year prior to Life of Project (duration 1 year)

Findings of Research Completed

Research into meromictic pit lakes has not yet been completed. This work is scheduled to start in 2019.

Open Pit Water Quality Research Results

No results have been provided yet as the mine has not advanced into the open pit stage. Ore has, to date, been extracted from the hillslope, rather than the future open pit.

Linkages to Other Research/Studies

This research will be linked to the research being completed regarding pit flooding timelines. Findings of waste rock stockpile runoff water quality reclamation research will be considered. Updates on open pit prediction of runoff water quality will be provided in future updates of the ICRP.

Costs

TBD

References

AMEC. 2012a. Interim Waste Rock Stockpile Seepage Quality Model Report, Mary River Project. January 2012.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 297 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

AMEC. 2012b. Interim Open Pit Water Quality Model Technical Memorandum, Mary River Project. January 2012.

AMEC 2012c. Interim Mine Rock ML/ARD Report, Mary River Project, January 2012.

Baffinland Iron Mines Corporation. 2012. Mary River Project – Final Environmental Impact Statement. February 2012.

Baffinland Iron Mines Corporation. 2013. Mary River Project – Addendum to the Final Environmental Impact Statement. June 2013.

Baffinland Iron Mines Corporation. 2018. 2017 Qikiqtani Inuit Association (QIA) and Nunavut Water Board (NWB) Annual Report. March 31, 2018

Knight Piésold Ltd. 2007. Mine Site Infrastructure, Pit Overburden & Waste Dumps - 2006 Site Investigation Summary Report. Ref. No. NB102-00181/3-2, Rev. 0. North Bay: Knight Piésold Ltd. February 28, 2007.

Knight Piésold Ltd. 2008. Mine Site Infrastructure, Pit Overburden & Waste Dumps - 2007 Site Investigations and Foundation Recommendations Summary Report. Ref. No. NB102-00181/8-2, Rev. 1. North Bay: Knight Piésold Ltd. February 20, 2008.

Knight Piésold Ltd., 2010. Mine Site Infrastructure, Pit Overburden and Waste Dumps - 2008 Site Investigations Summary Report. Knight Piésold Ref. No. NB102-00181/24-1, Rev. 0, May 4, 2010.

Knight Piésold Ltd. 2015. 2014 Water and Sediment CREMP Monitoring Report. Ref. No. NB102 00181/34-6, Rev. A, dated February 24, 2015.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 298 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

D.2 Reclamation Research Program - Open Pit Flooding Timeline

Background

The mining plan and the ongoing waste rock characterization plan will inform the prediction modeling of the mine pit water quality at the end of mine life (addressed under the “Open Pit Runoff Water Quality” research program). The results of the Open Pit Runoff Water Quality research program will be summarized in the annual NIRB and NWB reports which will subsequently be reviewed and discussed by the MCWG.

Based on passive inflows alone (seepage into the pit, direct precipitation, and surface runoff), it is anticipated that the open pit will take an estimated 85 to 150 years to passively fill (Knight Piésold, 2008). The flooding of the open pit could be accelerated by pumping water from a nearby water source (i.e. accelerated flooding). At a conceptual level, four potential water sources have been identified: Sheardown Lake, Camp Lake, Mary Lake, and Mary River. It was estimated that withdrawal from these sources could reduce the flooding time to as little as 2 years (based on a total withdrawal of 10% of the annual volume, although this would require very specific and ideal conditions to achieve. Section 5.2.1.4 of this document presents some preliminary assumptions and calculations regarding the enhanced pit infilling alternative.

Uncertainty

With respect to natural flooding, the rate of groundwater inflow is the primary source of uncertainty with respect to open pit flooding time prediction.

With respect to the enhanced flooding schemes, the primary source of uncertainties are:

- the maximum rate of water taking from the water sources; and
- the practical limit of pumping water from those sources to the open pit (feasibility and financial viability).

Research/Study Objective

The goal of this program is to better assess the timelines for Open Pit flooding for both natural flooding and the enhanced pit infilling alternative and develop a flooding program that will meet closure objectives and criteria in Post-Closure within an appropriate timeline relative to the proposed monitoring.

Overview of Tasks and Project Research Schedule

The key tasks of the study are as follows:

- Updating the accuracy of the open pit flooding timeline under passive conditions.
- Assessing the potential water sources for enhanced pit infilled in greater detail, and increase the accuracy of the enhanced pit infilling timelines.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 299 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

- Enhancing the understanding of the impacts of the pit flooding time on the overall closure plan and monitoring timeline.

Task 1 - Pit Flooding Timeline Predictions (passive conditions)

To better understand the rate of natural flooding of the open pit, pit dewatering flows (monthly volumes) will be recorded throughout operations to provide an estimate of the overall net inflows to the open pit, including all inflows (groundwater inflow, direct precipitation, and runoff) and outflows (evaporation and seepage).

It was estimated in 2009 that natural flooding would take between 85 and 150 years. Using the open pit dewatering flows as a basis of calibration, this estimate can be refined at a later time.

To complete this task, pumping records and data from the site weather station will be recorded during operations. The pit flooding model will then be updated with acquired site data.

Task 2 - Assessment of potential water sources / enhanced flooding

Assisted pit filling is governed by two parameters – technical limitations that drive pumping costs, and water source locations/drawdown limits. Costs are driven by materials and equipment required for the operation (e.g., heat-traced piping, pumps, generators, and fuel requirements) as well as the construction and maintenance of the necessary roads and berms. Pumping water to the pit is uphill and therefore significant elevation head will provide technical challenges to any pumping design. Water source drawdown limits are designed to ensure that the volume of water extracted from a given source has minimal impact on the aquatic ecosystem. Key factors to consider when calculating maximum acceptable drawdown of a lake include issues such as the potential disturbance of spawning habitat, as well as the residency time of the water body.

In order to better understand alternatives for enhanced pit filling, the following steps are planned:

- A desktop review of regional hydrological and potential spawning habitat data will be conducted to support the development of a waterbody-specific assessments for the maximum allowable water taking rate;
- a feasibility level engineering assessment will be carried out for pumping water from each of the potential water sources to confirm the feasibility of each alternative; and
- the estimated flooding times will be updated for each enhanced flooding scenario.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 300 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Task 3 – Enhancing the understanding of the impacts of the pit flooding time on the overall closure plan and monitoring timeline.

Following the completion of Tasks 1 & 2, the integrated schedule of closure activities would be reviewed in light of the updated natural and enhanced flooding scenarios and summarized for discussion with the MCWG. The flooding timeline would also impact post-closure monitoring durations at the Open Pit and down gradient areas.

Table D-2: Overview of Tasks for Reclamation Research - Open Pit Runoff Water Quality

Task		Reference Document	Status Anticipated Start and/or End Date
	Establish initial flooding time estimates.	KP 2008	Completed
Task 1	Monitor mine dewatering flow rates.		Ongoing (2013-Life of Project)
	Use mine dewatering flow rates to update mine flooding model to estimate passive (natural) flooding time.		5-years following onset of mine dewatering.
Task 2	Assess regional hydrology flows and retention times in each potential water source.		Should be completed during first 5 years of dewatering. Duration of task: 1 year
	Evaluate maximum allowable water taking with respect to protection of aquatic life.		
	Prefeasibility assessment of practicability of pumping from each water source.		
	Estimated flooding times from each water source to be updated using mine flooding model.		
Task 3	Review the impacts of enhanced open pit flooding on the mine closure activities and monitoring with Mine Closure Working Group.		Task to commence following completion of Task 2. Duration of task: 6 months

Findings of Research Completed

Initial predictions for filling times (natural and enhanced) have been previously estimated, as described in Section 5.2.1.4. Additional research that is to be carried out will be reported here.

Pit Flooding Timeline Predictions (passive conditions)

As no significant dewatering has taken place in the open pit to date, no update of the flooding model has been completed to date.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 301 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Open pit dewatering flows will be recorded once active dewatering (pumping) starts.

Results to Date

TBD

Linkages to Other Research/Studies

This research will be linked to the research being conducted on open pit water quality.

Costs

TBD

References

Knight Piésold Ltd. 2008. Mine Site Infrastructure, Pit Overburden & Waste Dumps - 2007 Site Investigations and Foundation Recommendations Summary Report. Ref. No. NB102-00181/8-2, Rev. 1. North Bay: Knight Piésold Ltd. February 20, 2008.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 302 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

D.3 Reclamation Research Program - Waste Rock Stockpile Seepage/Runoff Water Quality

Background

Metal leaching and acid rock drainage (ML/ARD) characterization studies in support of the Life-of-Mine pit waste rock are provided in the report entitled “Mine Rock ML/ARD Characterization Report Deposit 1, Mary River Project”, March 2014 as appended to the Life-of-Mine Waste Rock Management Plan.

The waste rock was subdivided based on broad geo-structural categories about the iron ore zone, mainly by hanging wall and footwall zones. A total of 776 waste rock samples were selected as representing the waste rock categories and broad spatial coverage of non-ore mine rock in the vicinity of the Life-of-Mine open pit development. All 776 waste rock samples were analyzed for modified Sobek acid base accounting (ABA), NAG pH and elemental content. Subsets of drillcore samples were also analyzed for downhole variability, NAG leachate, short-term metal leaching, whole rock elemental content, detailed mineralogical analysis, and long-term kinetic testing.

Results of ABA testing determined that waste rock is generally characterized as having low neutralization potentials (NP) and low acid potentials (AP). Data suggests that the waste rock is dominated by non-carbonate sources of NP (e.g. silicates) with lesser NP derived from carbonate sources. Sulphide was the primary form of sulphur. Approximately 85% of waste rock samples had neutralization potential ratios (NPR) greater than 2 and are classified as non-potentially acid generating (Non-PAG) and are unlikely to generate acidic drainage. Approximately 10% of the samples had NPR values of less than 1, and 5% of the samples were classified as having uncertain acid generating potential ($1 < \text{NPR} < 2$). Extrapolating these results to the project waste rock model, indicates that approximately 11% of the Life-of-Mine in-pit waste rock is expected to have $\text{NPR} < 2$ and is considered potentially acid generating (PAG). Proximity to ore appears to correlate to increased PAG quantities (defined as $\text{NPR} < 2$) with the hanging wall schist (HWS) and footwall schist (FWS) zones identified with the greatest proportion of PAG of the major waste units.

Analysis of a set of samples proximal to the proposed five-year pit indicates a lower sulphur and sulphide content is likely to be encountered in the shallower HWS and FWS rock of early development than at depth during later production. This lower sulphide content is expected to result in a lower percentage of PAG rock being encountered during early operations than would be predicted by extrapolating the overall (including deeper) HWS and FWS waste rock data to near surface.

For planning, 10% PAG rock plus allowances for expansion due to field screening limitations and dilution has been assumed.

Ten waste rock samples were run in humidity cells for 53 weeks in 2008 and 2009. A further 17 waste rock samples were initiated in humidity cell tests in May 2011 for between 109 and 120 weeks of reported data. Nine of these samples were standard humidity cells and eight were NP depleted humidity cells

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 303 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

designed to assess drainage quality in the absence of carbonate NP. The pH of most cells was in the range of 5.5 to 7 throughout testing. Of the 17 cells in operation since 2011, three cells exhibited slowly declining pH throughout testing reaching a minimum measured weakly acidic pH between 4.5 and 5 after approximately two (2) years of operation (under laboratory conditions). Metal release rates from humidity cells were generally low. Kinetic testing results and cold climate conditions at site suggest the lag time to acid on-set in PAG rock with potentially increased metal release rates would be on the order of five years or longer.

Waste characterization, volume estimation, and monitoring of the Waste Rock ML/ARD is ongoing. The design of the waste rock facility will be updated periodically as necessary throughout the LOM.

The deposition strategy for the water rock area is to promote permafrost aggradation. Studies of waste rock in permafrost demonstrate that permafrost forms an effective long-term barrier to water and oxygen, thereby preventing significant oxidation of sulphidic waste rock located below the surficial active zone. The surficial “active” zone, which will be subject to seasonal freeze-thaw.

For this reason, the PAG, Non-PAG, and Overburden are handled as three separate streams and are placed in zones within the Waste Rock Facility. PAG material will effectively encapsulated in non-PAG material.

The “active” zone is not anticipated to extend into the PAG material through 50 m non-PAG shell in the long-term (within 200 years) under the influence of climate change (Intergovernmental Panel on Climate Change, 2007). Therefore, over the long term, seepage water quality which is influenced by contact water that flows through the active layer in the waste rock stockpile will not be affected. Following closure, generation of ML/ARD is not anticipated.

Seepage and drainage is anticipated to discharge from the active layer and from portions of the waste rock pile that have not yet aggraded of permafrost.

Uncertainty

Due to the early stage of project development and only conceptual modelling done to date, there is uncertainty in the final composition of the waste rock stockpile. In particular, the composition may vary with respect to the proportion of waste rock by lithology, geochemistry, and the associated seepage/drainage conditions. Climactic conditions may also heavily impact the volume and quality of seepage, as thermal conditions within the pile can affect the rate of chemical release and reactions, permafrost develop creating low permeability conditions in an otherwise free draining media, and wetting-up time may impact the period of time for precipitation to report as seepage.

As more information becomes available, the conceptual modelling completed as part of the FEIS will be updated.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 304 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Research/ Study Objective

This research plan is designed to improve understanding of the expected performance of the waste rock stockpile closure concept in an effort to confidently characterize predicted waste rock effluent discharge quality and assess if waste rock stockpile seepage water quality can be expected to meet closure objectives and criteria (MDMER, CCME PAL) in Post-Closure.

Specific objectives include:

- Determination of quantity of waste rock stockpile seepage that can be expected post-closure.
- Determination of quality of waste rock stockpile seepage that can be expected post-closure.
- Greater understanding of the thermal evolution of the waste rock stockpile and permafrost development to determine impact on geochemical reactions and, therefore, seepage water quality.

Overview of Tasks and Project Research Schedule

The following are an overview of the anticipated tasks required to obtain the study objectives; the objectives are general in nature and not explicitly linked to the tasks below. An indication on status of each task is provided and when warranted, anticipated commencement and/or conclusion dates.

Task 1 – Monitor Drainage from Waste Rock Stockpiles and Additional Humidity Cell Testing

Water quality should be monitored at selected locations around the waste rock stockpile. Where seepage can be reliably associated with a particular area of the waste rock stockpile, careful records should be kept of the schedule, volumes, and lithology of waste rock that is deposited in that area.

Waste rock samples should be collected regularly from each type of lithology of waste rock. A small number of representative samples should be set up as humidity cells and run continuously.

Tasks 2 and 3 – Field Test Pad Construction and Monitoring

In the absence of completed areas at the Waste Rock Stockpile representative of closure conditions, field Test pads should be constructed of known materials to support various assessments, most notably including estimating leachate volume. The volume of seepage will be affected by wetting up time and permafrost aggradation. Waste rock piles in many climates may take years to decades to accumulate sufficient water (wetting up) to have precipitation report as seepage. While it may not be practical to establish Test pads greater than 50 m high to simulate the design conditions, test pads should be significantly larger than the maximum depth of the active layer.

Tasks 3 – Geochemical Modelling

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 305 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

With regards to modelling, the test pads would serve as controlled scenarios, from which the behaviour of the wastes can be extrapolated to the overall Waste Rock Stockpile. As a first step, the test pads would be studied for basic hydrogeologic function, with an aim to resolve the effects of wetting-up time and advancement of permafrost (also Research Program: Waste Rock Thermal Modelling). Subsequently, seepage from the test pads could be investigated with respect to chemistry, making allowances for composition of the test pads (lithology, grain size, etc.), thermal conditions, and hydrogeologic function.

The functionality of the test pads should be modelled based on the available climactic conditions (based on site weather data), mine production data, and geochemical assays and humidity cells. The model will then be calibrated using the leachate from the test pads, and subsequently then expanded to encompass the monitored locations of the waste rock stockpile. Water quality predictions will then be compared against the criteria set out in Table 5.1.1.

Should additional studies be required, recommendations for these studies would be included within the Reclamation Research Progress Reports.

Table D-3: Overview of Tasks for Reclamation Research - Waste Rock Stockpile Water Quality

Task	Reference Document	Status Anticipated Start and/or End Date
- Monitor drainage water quality from waste rock stockpile. Conduct focused review of seepage quality monitoring results to predicted leachate values. - Set up additional humidity cells for each type of waste rock lithology.	N/A	Life of Project (as necessary)
- Confirm the feasibility of developing field test pads or equivalent area for instrumentation in a completed section of the Waste Rock Stockpile. - Development of study design for field test pads (some including application of cover material) at the site using selected waste rock material generated during early mine development. - Construct, operate and monitor test piles (if feasible) to inform the project about projected drainage quality and water quality modeling assumptions under site-specific cold climate conditions	Phase 1 Waste Rock Management Plan (BAF-PH1-830-P16-0029)	Designed/constructed in 2019. Monitored from 2019-Life of Project
Modelling, interpretation and documentation of monitoring results (initially calibrating to field test pad data, and then extrapolating to the waste rock stockpile) to assess confidence if waste rock stockpile runoff water quality can be reasonably expected to meet closure objectives and criteria (MDMER, CCME PAL) in Post-Closure	N/A	Scheduled for 2024, then updated every 10 years

Findings of Research Completed

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 306 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Seepage from the Waste Rock Stockpile has been monitored as part of regular site operation. As reported by Golder in the Interim Waste Rock Management Plan (IWRMP) (March 2018), in the summer of 2017, seepage conditions from the Waste Rock Stockpile pond were found to be more acidic than was anticipated. A water treatment facility has been installed in the interim to address short-term issues with respect to water quality.

An updated water quality model will be prepared following collection and analysis of the 2018 instrumentation data (thermistor, oxygen sensor, and geochemical samples) and 2019 test pitting data.

A mass-balance based model approach will be used to develop water quality predictions that take into consideration the waste rock deposition plan, water balance and geochemical data. Infiltration and runoff flow estimates will be assigned water quality source terms to predict seepage and runoff water quality corresponding to the 1-5 Year WRMP. Existing data and new results from laboratory-scale geochemical tests will be used to develop mass loading source terms for each of the main material types present in the WRF. The results of laboratory scale tests will be used to develop specific scenarios in terms of particle size distribution, water-to-rock ratios, temperature, and availability of atmospheric gases that could influence material reaction rates (e.g., oxygen and carbon dioxide).

The results of the water quality modelling will be included with the 1-5 Year WRMP submitted in December 2019. These results will also be used to inform the need for supplemental instrumentation and/or monitoring locations to support this research plan and better assess the need to re-evaluate effluent quality under the closure design (i.e. following construction of a cover and establishment of permafrost within the waste).

Linkages to Other Research/Studies

Predicted leaching rates for various waste rock lithologies will be shared between this study and of the Open Pit Runoff Water Quality research program.

Findings of natural re-vegetation reclamation research will be considered related to colonization of cover material.

Regular updates on waste rock characterization and prediction of runoff water quality will be provided in future updates of the Life-of-Mine Waste Rock Management Plan (BAF-PH1-830-P16-0031) and ICRP.

Costs

TBD

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 307 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

References

- Baffinland Iron Mines Corporation. 2012. Mary River Project – Final Environmental Impact Statement. February 2012.
- Baffinland Iron Mines Corporation. 2013. Mary River Project – Addendum to the Final Environmental Impact Statement. June 2013.
- Baffinland Iron Mines Corporation. 2014. Phase 1 Waste Rock Management Plan BAF-PH1-830-P16-0029, Rev 0. April 2014.
- Baffinland Iron Mines Corporation. 2015. 2014 Qikiqtani Inuit Association (QIA) and Nunavut Water Board (NWB) Annual Report. March 31, 2015
- Knight Piésold Ltd. 2007. Mine Site Infrastructure, Pit Overburden & Waste Dumps - 2006 Site Investigation Summary Report. Ref. No. NB102-00181/3-2, Rev. 0. North Bay: Knight Piésold Ltd. February 28, 2007.
- Knight Piésold Ltd. 2008. Mine Site Infrastructure, Pit Overburden & Waste Dumps - 2007 Site Investigations and Foundation Recommendations Summary Report. Ref. No. NB102-00181/8-2, Rev. 1. North Bay: Knight Piésold Ltd. February 20, 2008.
- Knight Piésold Ltd., 2010. Mine Site Infrastructure, Pit Overburden and Waste Dumps - 2008 Site Investigations Summary Report. Knight Piésold Ref. No. NB102-00181/24-1, Rev. 0, May 4, 2010.
- Knight Piésold Ltd. 2015. 2014 Water and Sediment CREMP Monitoring Report. Ref. No. NB102 00181/34-6, Rev. A, dated February 24, 2015.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 308 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

D.4 Reclamation Research Program - Waste Rock Thermal Modelling

Background

Thermal analyses of the waste rock stockpile to predict the long-term distribution of permafrost within the dump will be required. The heat transfer processes can be simulated with available computer models; however, none of the models can confirm that permafrost will develop within the dump without more reliable input data regarding the method of placing the waste rock and the resulting properties of the waste rock in the dump. In addition, it will be important to compare the thermal analyses against existing case histories including the Nanisivik mine.

Uncertainty

It is unclear at what rate the waste rock stockpile will experience permafrost aggradation during operations and closure, and/or what the eventual active layer thickness will be.

In addition, a better understanding of the exothermic nature of the acid generating materials currently in the PAG pile is required to predict aggradation.

Research/Study Objective

Thermal monitoring and evaluation is required as part of the current LOM Waste Rock Management Plan and to support the prediction of aggradation rates and estimation of the active layer thickness.

The objective of the thermal modelling program is to monitor ground temperatures and confirm the aggradation of permafrost within the waste rock stockpile and active layer thickness in order to update long-term ground temperature predictions.

Overview of Tasks and Project Research Schedule

Task 1 – Thermistor Data Collection

Data from temperature sensors installed to monitor the ground temperatures will be collected on a regular basis and used to ensure that frozen conditions are maintained below the waste rock stockpile.

Task 2 – Thermal Model Development

Based on the results of the geochemical sampling program and the thermal instrumentation program a thermal model for the pile will be developed. If substantial heat generation from oxidation is expected based on geochemical results, the thermal model may incorporate heat generation from sulphide oxidation in the pile to model the impact of heat generation on the pile freeze-back process. Climate change will also be included to account for warming temperatures after closure.

Table D-4: Overview of Tasks for Reclamation Research - Waste Rock Stockpile Thermal Modelling

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 309 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Task	Reference Document	Status Anticipated Start and/or End Date
Task 1 – Thermistor Data Collection	N/A	Life of Project (as necessary)
Task 2 – Thermal Model Update	N/A	Following at least 5 years of data collection.

Findings of Research Completed

During the December 2018 program thermistors were installed at locations T1 through T5 and BH1, BH2 and BH3, as well as oxygen sensors at BH1 and BH2. All installed instruments are recording readings on 8h intervals. The instruments are currently equilibrating and therefore limited data are currently available. Preliminary data from BH1 and BH2 indicate that the WRF is frozen to depth, and that there is no indication of oxygen depletion associated with potential reactions within the WRF.

A thermal model of the WRF will be completed once sufficient site data has been collected for model calibration. The thermal model will consider the waste rock deposition plan, atmospheric conditions, and stockpile chemistry. The thermal model is expected to provide an estimate of the freeze-back time for the WRF and ability to maintain the WRF in a frozen state. The results of the available thermal modelling will be included in the 1 to 5 year WRMP submitted in December 2019.

For the current interim update preliminary thermal models were prepared to assess the time for waste rock to freeze under varying deposition and climatic conditions. The model results were used as a guideline for the waste rock deposition plan updated with the IWRMP. Transient one-dimensional thermal models were prepared using the finite element software TEMPW2018 (version 9), developed by Geoslope International Ltd. A description of the different model components are discussed in the the IWRMP and TSD 2 (Appendix I) of the Phase 2 Proposal.

Linkages to Other Research/Studies

The thickness of the active layer will be considered in the development of the Waste Rock water quality predictions.

Costs

TBD

References

TBD

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 310 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

D.5 Reclamation Research Program - Natural Re-Vegetation

Background

A review of baseline data collection results applicable to re-vegetation during reclamation was conducted based on the findings of the vegetation baseline studies associated with FEIS development (FEIS Appendix 6C – Vegetation Baseline Report). Findings indicated approximately 20 plots were established on the old road surface or adjacent to it, in sites disturbed in the past. These sites were surveyed to contribute to the knowledge of natural succession and the plant species that can become re-established without intervention. Observations from baseline work applicable to reclamation include:

- Natural re vegetation in this general environment is slow, but not as slow as expected. Based on observations on an old silver mine near the Doris North Project in the Kitikmeot Region, researchers expected little re-vegetation in the Mary River study area thirty years after use, but were surprised to find that considerable re-vegetation had occurred along the old tote road, particularly in damp areas. The difference is that much of the area traversed by the tote road is on sandy soils, whereas the Roberts Bay Silver Mine is located mostly on fractured gravels (Burt, 2003).
- Colonization of dry areas along the old roads, paths, and campsite areas is occurring slowly, so slowly as to be almost immeasurable in the time since the disturbance.
- Plant communities around the old mining camp near Sheardown Lake have been slightly affected by the addition of nutrients, and are, as expected, richer than normal, with more lush growth and more species of grasses and forbs.
- This colonization (around the old camp) may be on the wane, due to depletion of nutrients and lack of enrichment in the ensuing years.
- There are plenty of local species that can be utilized for reclamation; it is neither necessary nor advisable to obtain plant stocks for reclamation from elsewhere. Use local/regional plant stocks and seed sources for any active revegetation being done on the Mary River Project.

Uncertainty

Due to limited research conducted to date for mines in the Canadian Arctic, there is uncertainty in the rates of natural re-vegetation at disturbed areas Post-Closure. This research will focus on development of methods to promote accelerated recovery of a sustainable vegetation cover that also benefits the desired land use for the Project sites over these long expected timelines. These sites include gravel roads, gravel pads, waste rock stockpile, and other priority areas identified during closure planning.

It should be noted that vegetation is naturally sparse or nonexistent (e.g., waste rock stockpile footprint) over much of the Project Area, and therefore the potential for natural re-vegetation of disturbed Project areas is uncertain. Re-vegetation by reseeding or replanting is not currently being considered by the

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 311 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Project based on the current site conditions and the potential for success in areas not historically vegetated.

Research/Study Objective

The goal of this program is to identify methods to successfully promote natural re-vegetation in an effort to achieve a sustainable vegetation cover that meets the desired aesthetic conditions for the Project site post-closure in the shortest duration possible. Specific objectives may include:

1. Identify Site Preparation Techniques Best Suited/Tailored for Natural Revegetation:
 - a. Characterize control/undisturbed landscape conditions as a template for reclaimed environments.
 - b. Examine landscape preparation approaches that will increase the availability of micro-habitats conducive to plant early-establishment.
 - c. Determine timelines and measurables for reclamation success.
2. Identify Indicator Species Best Suited for Natural Revegetation:
 - a. Characterize control/undisturbed vegetation conditions as a template for reclaimed environments.
 - b. Examine landscape preparation approaches that will increase the suitability of micro-habitats for plant early-establishment and development of cover vegetation.
 - c. Determine timelines and measurables for reclamation success.

Overview of Tasks and Project Research Schedule

Because it is too early to establish experimental reclamation plots within the Project footprint, Baffinland will, in 2019, conduct a detailed desktop study of reclamation efforts, successes and lessons learned in Arctic Canada in 2019 (EDI, 2019). The review included work completed at other Arctic sites, including mine, municipality, and contaminated site (e.g., DEW line site) reclamation and remediation.

The following are an overview of the anticipated tasks required to obtain the study objectives; the objectives are general in nature and not explicitly linked to the tasks below. An indication on status of each task is provided and when warranted, anticipated commencement and/or conclusion dates.

Table D-5: Overview of Tasks for Reclamation Research - Natural Re-Vegetation

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 312 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Task	Reference Document	Status Anticipated Start and/or End Date
Review of baseline data collection results applicable to re-vegetation during reclamation	FEIS Appendix 6C – Vegetation Baseline Report	Completed in 2016
Literature review of re-vegetation at disturbed areas in northern climates	EDI 2019	Completed in 2019
Determine/classify the composition of soil substrate on Site (if/where present) to identify constraints and limitations to the colonization and early establishment of plants	N/A	Scheduled for 2019
Establishment of representative test plots for Project candidate sites for re-vegetation: gravel roads, gravel pads, waste rock, stockpiles, and waste dumps	N/A	Scheduled for 2020
Engage Inuit to incorporate and align with traditional knowledge and land use objectives	N/A	Scheduled for 2019
Soil sampling and vegetation assessment	N/A	Scheduled for 2019-2024
Interpretation and documentation of monitoring results assess confidence in developing re-vegetation procedure (Reclamation Research Summary Report issued)	N/A	Scheduled for 2025
Identify any additional research that may be required and long-term monitoring	N/A	Scheduled for 2025
Continued monitoring and analysis of re-vegetation research plots (if necessary)	N/A	2025-Life of Project (as necessary)
Determine monitoring results applicability to closure and reclamation strategies and criteria	N/A	Scheduled for 2026

Findings of Research Completed

In 2019, a literature review was completed on reclamation practices for Northern mines. Based on the findings of the review, the research tasks and timelines above have been updated with a more focused approach.

Linkages to Other Research/Studies

Findings of natural re-vegetation reclamation research will be considered related to colonization of cover material for waste rock stockpile. Updates on natural re-vegetation reclamation research will be provided in future updates of the ICRP.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 313 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Costs

TBD

References

Baffinland Iron Mines Corporation. 2012. Mary River Project – Final Environmental Impact Statement. February 2012.

Baffinland Iron Mines Corporation. 2013. Mary River Project – Addendum to the Final Environmental Impact Statement. June 2013.

Burt, P. 2003. Miramar Hope Bay Ltd., Doris North Gold Project, Vegetation Baseline Studies, Report, Outcrop Ltd. 2003.

Environmental Dynamics Inc. 2013. Baffinland Field Guide to Exotic Plant Species Identification. Project No. 13-Y-0012. Prepared for Baffinland Iron Mines Corporation. Dated September 20, 2013

Environmental Dynamics Inc. 2014. Baffinland Mary River Project: DRAFT 2014 Annual Terrestrial Monitoring Report. Project No. 14-Y-0244. Prepared for Baffinland Iron Mines Corporation. Dated November 16, 2014.

Environmental Dynamics Inc. 2019. Research Review – Advances in Arctic Reclamation. Implications for the Reclamation Practices and Trials at the Mary River Mine Project. March.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 314 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Appendix E

Record of Engagement

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 315 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

As the Project advances, Baffinland is committed to engagement with stakeholders regarding closure and reclamation issues. These issues include, but are not limited to:

- Appropriate closure and reclamation strategies and criteria based on desired end use of Project areas.
- Additional or modified reclamation research activities (Appendix D).
- Requirements to address identified uncertainties and determine the appropriateness of existing action levels (Appendix D and Appendix G).
- Whether there will be any interest in maintaining the bulk fuel storage facilities and/or sealift landing areas for use by the local community assuming responsibility for the operation and maintenance of the facilities would be transferred to the local interested party.
- Transfer of responsibility of the Tote Road water crossings to the local community and if the Tote Road will be left completely intact assuming road operation and maintenance responsibility would then be transferred to another party.
- Transfer of responsibility of airstrip (including airstrip lighting) to the local community assuming the airstrip is left intact and operation and maintenance responsibility would then be transferred to another party.
- Whether there will be any interest in transfer of salvageable materials and buildings for local community use assuming responsibility would be transferred to another party.

Baffinland anticipates to rely on the MCWG (Section 2.4) in order to best facilitate stakeholder engagement related to the Mary River Project and incorporate considerations for post-closure land use of the Project site. A mandate or Terms of Reference for the MCWG will be developed in consultation with the QIA prior to the initial first meeting of the MCWG. Baffinland expects an early priority for the MCWG will be to determine additional or modified reclamation research activities applicable to the Project to help address identified uncertainties and determine the appropriateness of existing action levels.

Baffinland is currently in the process of integrating ‘StakeTracker’ software into project monitoring and reporting initiatives which will facilitate a comprehensive coverage assessment of stakeholder engagement matters related specifically to closure and reclamation issues historically and moving forward over the life of the Project. Table E-3 provides a summary of comments received to date which are specific to mine closure, together with associated responses and cross-references. While mine closure has not been a primary topic of the feedback received during engagement activities, many in-direct discussions on closure have occurred focusing on related issues such as considering land-use in mine design (e.g. route Tote Road and North Railway), proposed environmental mitigation, management and monitoring techniques during mining, and residual effect predictions. TSD 4 of the Phase 2 Proposal presents the Public Consultation Report from activities supporting this Addendum.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 316 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Closure was included as a topic during the Community Risk Assessment Workshops held February 12-14, 2019. Although a participant suggested it was too early to provide comments on closure, the other issues brought up were generally consistent with the issues listed above. Table E-1 will be updated as 'StakeTracker' is updated with ongoing engagement.

Table E-3: Record of Engagement

Stakeholder Comment	Project team comment	Date and Event
This is not really concerning Baffinland, but refers to caribou. The infrastructure from the Nanisivik Mine was left behind. We tried to get the mine to clean it up but they didn't. There were fuel and diesel spills left behind. No one has cleaned it up. Seals have bad livers now because of what they were eating. Pond Inlet will need to worry about fuel and fuel clean up. The marine mammals can be affected because of this; we've seen the impacts in Arctic Bay from this. Just beware of all these promises the company makes.	None.	2015-11-20 - Pond Inlet - Workshop No. 4
You mention that the mine is going to operate for 100 years, can things start being cleaned up at the mine right now?	It is a very insightful question, when we talk about long term mine life, we are not talking about adding and adding and adding for 100 years. We will clean up deposit one after we are finished and so on. I understand that dust is a major concern, we are hoping that the rail will mitigate dust concern, and help BIM survive. We are constantly monitoring it, and so far we have seen no effect on wildlife. The deposit we have been mining right now, has been eroded for a long time so the animals and plants are used to it, however we are learning as we go and addressing it. This year they want to make a proposal, phase 2 and right now the current certificate to use the tote road, in the event than Baffinland was approved, and they would want to hear about your concerns they will follow your concerns and recommendations. NIRB is the one who issues certificates.	2017-05-30 - Pond Inlet - Community Meeting
On page 11, drums were used in the early stage of exploration. Later on, they were using containers. The drums of fuel that were used are stockpiled at the dump now, corroding away. When I was a young man, these were used as fuel drums. Is that going to be the same practice for you guys? Are you going to leave the drums there when you switch to containers?	Jon: No, we will send the empty drums south afterward. Tom: Things are different now; we need to put up reclamation funds ahead of time. Also, our practice now is to remove the drums by backhauling empty drums as well as any other waste we can't incinerate.	2018-04-05 - Hall Beach Hamlet and HTA re: Ege Bay Exploration Program
Three topics. I myself want the environment protected. Although the job opportunities are important, I also want the environment protected. While they are exploring, once they have done their exploration, we know they won't be making any money and they have to clean up the area. They have to close it and try to put it back the way it was before. Will they go back to Baffinland, or will they be surplus and given to QIA? If that were to happen, if they make money they would probably stay there. If they are going to drill deep down, what will they use to close them up (the drillholes)?	We are required to put up money to guarantee that we will clean the site up if we don't move forward to development, and restore the site to it was before. Regarding the camp and equipment, that would be a decision that upper management would make, whether it was sold off to the community or brought to another project. For reclamation of drillholes, drilling has small disturbance impacts. The site is cleaned up and the hole is backfilled with sand or cement – something just to plug it up.	2018-04-06 - Igloolik Municipal Council, Igloolik HTA and QIA Re: Ege Bay Exploration Program
None.	30Mtpa will be mined out of Deposit 1, the first iron ore deposit. There are other deposits in the area that Baffinland has claims to. We will have to go through this process again to mine on a different deposit. We believe this is a multigenerational project. Once deposit 1 is done we would go into closure or pick another deposit to mine.	2018-06-11 - Clyde River - Workshop

Stakeholder Comment	Project team comment	Date and Event
I want to make a comment, we were told that we could not drink water from the lakes or the river anymore by the docks, because the river is flowing. How are the waters, we have fish in those lakes, I would like you to check on lakes and check on the river, there are 4 big lakes, they have lots of fish, when we see them, the fish are very healthy stock, and there's lots of fish, maybe too many, in one summer, because of the fish in those lakes, because we were told not to drink from those lakes anymore. I wonder how it is affecting the fish, if there is damage done there would be compensation or assistance. It is important that you monitor and check those lakes that are important to us. They are very close to Milne Inlet, I don't know how they are affected, if they have not done any studies, it is important that you do it soon, if you damage all the fish in that area that we depend on for our livelihood, I am looking for compensation, that's the only way we can deal with it if the water is damaged in that area. We saw something different this year, the birthing place of narwhals, that area had no whales whatsoever. When our research vessel checked the situation, they reported that nothing had been happening in the birthing place for a month. I can't say why, nobody knows with certainty. Why is it that you are not monitoring and researching the lakes and rivers? I need to say that you may end up compensating us. One goal is you want to build a railroad, people have lived there, I don't support Steensby Inlet expansion, they also have fish in that area, thank you.	Megan: Thank you for your comments and questions. We are aware that there was information circulating on site this summer that someone was told not to drink the water, I'm not sure exactly what happened and what was said, but I can say that the people who are qualified on site to speak to the quality of the water in the area did not say anything like that. We have environmental monitors on site, they are accessible, you can ask security on site if you want to speak to them directly and they can provide information, so that team that does the environmental monitoring did not say anything like that. We do in fact monitor the freshwater and marine environment, we do monitor the lakes, water and fish around the mine site, and I wanted to say that we have a water compensation agreement with the QIA, so if impacts were to occur or the quality of water were to be harmed, we have a compensation agreement set up with the QIA, where compensation would occur if there were any impacts. Richard: As Megan has indicated, there is what is called an environmental effects monitoring program, at the mine site looking at the lakes right next to the mine, Camp Lake and Sheardown Lake, right now monitoring has shown slight changes in the lakes but nothing harmful to fish. Fish need much cleaner water than humans do, so the environmental limits for fish are very low compared to those for drinking water. At Milne port there is a similar aquatic effects program at the dock area to detect changes around the dock, and no meaningful changes at the dock have been seen. So if there is no meaningful change right by the mine or the port, the project would not be affecting the waters further out. These monitoring programs are comprehensive, look at water quality 3x per year, sediment quality, changes in invertebrate communities (little bugs), and studying fish, so they look at all components of the aquatic environment. So they look if there are any technical changes to those components.	2019-01-10 - Pond Inlet - Phase II Community Consultation
We were asking about tents and upgrading accommodations. Maybe you can give the tents to the communities.	There is a policy that the QIA has priority if they want to take decommissioned equipment. We have to consult with them first.	2018-06-15 - Hall Beach - Workshop

Stakeholder Comment	Project team comment	Date and Event
Thank you, I want you to know, I'll introduce myself, I am a QIA representative now, (Charlie Inuarak), I want to make a few comments. There are issues being raised. When the mine was being initiated, Qikiqtani, NTI and all the new players were not with us. We had to deal with the mining company on our own, they made some wonderful offers, if we see a ship leaving with ore, it means money going to Inuit, and they made wonderful promises, each ship is going to provide that much revenue to the community. They also said if they extract the land and the open mine they will pay royalties to QIA. Workers at the mine also said this, and they sold it very effectively. There will be many Inuit contracts, the offer was very good, jobs were offered, I was the mayor at the time, and I wanted employment for people in the community, I lobbied the federal government, I supported Baffinland because they were going to produce jobs for Inuit. We had hope, I was happy to hear somebody said you made wonderful offers, money, employment, we know that there would be other financial benefits going on, but the community here that I represent, I decided to run for QIA because Phase 2, the railroad to Steensby Inlet, is a current issue. Once they proposed that the hunters and trappers and hamlet met, I heard them talking, saw them, I was a participant, all the things that we had planned, we had hopes, we had raised concerns, and we are not seeing the results we had hoped to see, we are not seeing the promises. Are you using the people of Pond Inlet, are you buying us off? When the hunters and trappers and the hamlet did not support Phase 2, the environment, NIRB, planning commission and other regulatory bodies heard the response from the community. Once we had made a stand, we see a letter that Qikiqtani wrote, NTI president and QIA president wrote a letter and supported expansion too, and they sent those to NIRB. You have breached our trust, Qikiqtani should have said representing the community, they should have come to Pond Inlet to see how the people of Pond Inlet felt about it, and spoken with the elders, nobody consulted us from the Inuit bodies, I decided I was going to run for the QIA representative because they are going past the community, and making those decisions ignoring our input, QIA and NTI president both wrote a letter of support, they said you have been approved by the Crown, does that mean I reiterate that Pond Inlet does not support Phase 2, we are weary about many ships coming and going, and the damage to our life. I know you are in a rush to get going, its a very short time but you are asking us for input. I will be reporting that to Qikiqtani that we are not getting enough time to respond, and I also expect the railroad will affect us, we have not even discussed it as a community, or even reviewed it, we have not yet discusses it as a collective, so I will be reporting to QIA, to the president that we have not had enough time for consultation. It is good that you are here, but you rush, come and go, we need more time, more information, more understanding, I will say again, you do not own the money or the company, you are employees, we don't see the owners of the company, you employees like us Inuit are being used by the company to sell this idea. I would like to deal with the owners of the company. I would like to be able to come up with more concrete ideas and more time to discuss our opposition, you who are present here in the front are doing the job for the company. There's times that you talked about closure, if you don't get this, if your not approved that, so QIA hears that and they believe you, so they look for ways to keep you here, because we need to be better organized as a team, a collective, there are many players in this.	Thank you Charlie, we won't respond to it, we are happy you were elected as a QIA representative.	2019-01-10 - Pond Inlet - Phase II Community Consultation
In the event of having an additional dock, who would have to approve it, would DFO have to approve it?	You would have to approve it in two different ways. Fish cannot be disturbed, and fish use that area and would be using the area in future. DFO would have to approve changes to the area. If the fish were to stop using the area, we would have to have a plan to help the fish could go somewhere instead of the Inlet if the dock affected the fish. No habitat loss with the new dock due to the rehabilitation of fish.	2017-05-29 - Clyde River - Community Meeting

Stakeholder Comment	Project team comment	Date and Event
The past couple years of GN’s composition surveys aren’t designed to determine population levels. John can’t say the population is different than when the last population survey occurred, but when the population is low, the likelihood of detecting an animal is low so you should have increased efforts when populations are low. The traditional knowledge from elders is based on pre-development knowledge—the project may impact the animals coming back, current literature suggests it will. Even if there are no caribou, it’s worth modifying the survey method to increase the confidence there really are none.	Baffinland: Does the GN have any information to suggest that population levels are not low right now? Baffinland isn’t refusing to put more effort into surveys but would need a reason to increase efforts. Baffinland: As an example, we could not run our energetics model (used in FEIS and revised post-FEIS based on QIA comments) unless there are 700 caribou. If anyone knew how many caribou there were, it would be the GN from their regional aerial surveys. Is it correct that most caribou are south of the project? Baffinland comments that we are not saying there are no caribou, just very low abundance, and we are not seeing in our surveys.	2018-08-03 - Teleconference with Gov of Nunavut and Baffinland
People in Pond Inlet would be worried, about a potential sealift in the winter. It will really impact the seals. It would frighten and scare away seals and narwhals. How can we get benefits for the seals?	A lot of planning needs to be done before we do a winter sealift. Including pre- and post-seal den surveys. If wildlife are impacted, then there is a compensation fund if it effects hunters. If there is a big issue, they all cannot get compensation, but an individual can.	2017-06-02 - Hall Beach - HTO and Hamlet Meeting
When they dig down the whole mountain what are we going to call it?	Former Mary River	<u>2016-11-25 - Hall Beach - Public Forum/Meeting</u>
It appears there should be more training programs in the north, there are lots of training opportunities down south in Ontario. There should be more training of heavy equipment operators in the north. We should have more BCLO's than one in each communities and if they have to go on medical travel they should be replaced temporarily. The frequency of ships will impact pond inlet. A fox which was painted red by a white person, a lot of people were against that, they could not determine who painted the fox red and that was unfortunate. Last year, a lot of sculpins died out. We do not hear about these negative impacts on wildlife but a lot of us are being impacted. In the future, we want to hear all of the concerns not just what Baffinland wants us to hear. Can a report be made by Baffinland when such impacts are found?	Part of my job is to help Inuit to apply for benefits and insurance, and QIA is developing a grievance database for employees. A database of Inuit employees that are ready to work is a great idea. Whether a fox or a rabbit is killed by a vehicle QIA always informs the HTO's but they do not necessarily pass it on to the communities. Through the wildlife compensation program, QIA has set away some funds for wildlife compensation purposes. I want to know roadkill there were, we should give it some careful consideration, and we need better communication with community and QIA. HTO should voice their concerns more. We do have environmental working groups set up that have many associations in attendance, in terms of getting info back to communities, we are trying to provide reports that are more accessible to people in communities. Our reports are publically posted on the BIM website document portal. We are open to more ideas on how to serve the communities. We will have future community visits. QIA and many organizations are working on the working group we had a meeting in May and we have returned to summarize this info. I was supposed to go on radio and I got tied up, once this tour is concluded I will go on radio to discuss these issues. I would like to respond, to the comment, it is difficult to anticipate when BCLO's will have to go out on medical leave. I was glad to hear this comment we did not have a BCLO for a lengthy time.	2017-05-30 - Pond Inlet - Community Meeting
Comment Form submitted with the following information: Did the open house provided sufficient information? Response: No. "Quarrying stones, as an Inuit would I be able to have access to the quarry site? Would Baffinland be able to assist me quarrying the stone? No pamphlets, no info available in topics of how Inuit can quarry to harvest stones" Were your questions Answered? Response: No "See left column for info" Any other comments? Response: "What options there are for or available for quarrying carving stones and what sources are available to be assisted quarrying stones for livelihood purposes. Please provide more info at meetings"	Public meeting provided insufficient information	2016-11-22 - Pond Inlet - Public Forum/Meeting

Stakeholder Comment	Project team comment	Date and Event
I probably won't get very good response but hunters, they hunt above all else, I think the people of Pond Inlet are hunters one way or another. Before Phase 2 was being prepared, people of Pond Inlet were informed by Baffinland that the Tote Road from Mary River to Milne Port was going to be a public road, but it turned out once they started hauling ore they would restrict hunters from travelling on the tote road, and under the IIBA it stated that 25% Inuit would be employed by the mine and we have not reached that. Thirdly the ship route, Pond Inlet hunters were shown the route of the ship but it turned out there would be a lot of ships outside the track, right now when they are planning to design the railway line the hunters, our traditional trail was totally blocked by the potential railway line. From 2005 to 2017 they gathered information on how much wildlife had been impacted and marine mammals have been impacted greatly, even though Baffinland says there has been minimal impact, but since the iron ore ships have been loaded and the noise they emit, form 2005 to 2015 condition, how can we review Phase 2 because I want to see a factual agreement, and have an agreement become a law. At this time Inuit people working at Mary River, people have worked lots for Baffinland and they are not put in a senior position because they are not Caucasian, many of them have stopped working because there is bias still, I imagine under the Phase 2 new employees, we were informed by QIA and Baffinland that people from all over Nunavut would be hired and not just those from affected communities.	Thank you for your comments and questions, the first comment that I heard was that the communities were told that the Tote Road would be a public access road, and that hunters have felt there are restrictions to this now. It continues to be a public access road and in the IIBA it outlines the uses of the road and project area. There are no restrictions on the use of the road, but we do ask that hunters for safety reasons check in with security to let them know they are in the area for safety reasons, hunters are welcome to come into the project site and the facilities as well, there are no restrictions on the use of the area. Based on the IIBA, that goes to hire the number of Inuit in the following years, 25% was established by QIA, Baffinland could not achieve that goal. How can we improve this to have more Inuit work at the mine. They have been trying to resolve that issue, but haven't gotten there yet. In the future if QIA negotiates the IIBA and they know the 25% Inuit labour force will not be reached, they will try to resolve the issue by QIA and Baffinland. Once they make changes to the present format communities will be informed. You mentioned about the ships not following their assigned route. Sometimes the ships try to avoid travelling through ice and we have been informed by HTO in Pond Inlet that the ships were waiting out in the open water, and they were supposed to be parked at Ragged Island. Sometimes they have to go out into the open water for safety reasons, they might get stuck or dragged and run aground. Last week we had a meeting with HTO board members and there were some personnel from Baffinland that deal with shipping issues and they were there to talk about shipping routes and they informed the HTO here at this meeting that if the ships do not follow what they are required to do there is a toll free line where HTO board members can contact their shipping people, and the person responsible for shipping from Baffinland will make themselves available to receive information in regards to some ship's contact. You could contact those people in the event that you don't have a toll free line, HTO has a toll free number they can provide to you. Last spring there was an accident involving a caterpillar, people were informed about the Nunavut Quest and I believe the tractor was trying to level the ground because we had limited time to construct that trail that we were informed that the dog teams were going to be travelling through that area, so that was an unfortunate event and we should have been informed way in advance so we could have been prepared well in advance. Inuit when they are put in senior positions they are put down by their supervisors, we can try to deter people, the senior managers from putting people down. I am not a counselor personally but we can try to rectify the situation if such a situation occurs. We want to be informed, know that this person has been letting other employees down, once we hear about it we can try to rectify the situation. You also mentioned someone went on CBC radio stating we hire employees from other Baffin communities, so other people from communities can be hired that's what we heard on CBC radio.	2018-06-12 - Pond Inlet - Workshop

Stakeholder Comment	Project team comment	Date and Event
Continued from comment above.	The IIBA is an agreement by QIA and BIM signed in 2013. The five impacted communities can have employees and if other communities want to have employees Baffinland can't pay for their room and meals. For example if you were to hire a person from Pangnirtung they would have to go through Iqaluit. And based on the IIBA if a person from Pangnirtung came on their airfare would be paid for by Baffinland and they would be picked up in Iqaluit, and we would pay their room and board in Iqaluit. If there are people that are outside of the 5 impacted communities Baffinland would pay for their room, board and flights. So since 2013 people from other communities could be hired, but we want to give priority to the five impacted communities. For example if a person from Pangnirtung and Pond Inlet apply for the same job their chances will have to be treated as equal. That is based on my understanding. Megan you may want to respond to the question about seals and narwhals being impacted by the project. The next area is we are changing the mode of transportation, on the Tote Road we will see an increase in the number of trucks during construction which will be reduced following construction. The road will still be used to transport people and equipment, and access to the road will not change for community members. If we look at the figure showing the northern railway, the red dashed line shows the proposed alignment of the railway, the rail line itself will be within 100m of the road for the most part except for one part where it will be 7km away to avoid a large hill. Line will be about 100km long, with a railway bed of approximately 1.5m height. Railway crossings will be built for humans and wildlife and there will be signalling equipment along the line. Moving to the rail line produces less emissions to the air and reduced fuel comparison to trucks. There will also be fewer transits compared to trucks, 2 trains approx. 1km in length during 3-4 trips per day. Some of the effects that we are looking at are potential habitat loss and restriction of movement for caribou, potential impacts to hunter travel, or effects to fish and fish habitat. Mitigation measures we are proposing to mitigate those impacts are crossings for hunters so the rail does not impact travel routes. They will be designed for passage safely by snow machines and will have signs for the crossings. There will be speed limits on the train and temporary stoppages when animals in the area. Crossings will be a very gentle slope for most of the rail bed there will be large angular boulders used to build up the rail bed, that will be covered by a fine gravel and wood will be placed between steel lines to reduce friction on the rails and prevent animals from getting caught.	2018-06-14 - Iglookik - Workshop
In the event of having an additional dock, who would have to approve it, would DFO have to approve it?	You would have to approve it in two different ways. Fish cannot be disturbed and fish use that area and would be using the area in future. DFO would have to approve changes to the area. If the fish were to stop using the area, we would have to have a plan to help the fish could go somewhere instead of the Inlet if the dock affected the fish. No habitat loss with the new dock due to the rehabilitation of fish.	2017-05-29 - Clyde River - Community Meeting

Stakeholder Comment	Project team comment	Date and Event
Good evening, regarding Baffinland Phase 2 proposal, we were involved in Phase 1, in phase 2 there are many things that you are proposing, some of them having been completed, if you increase your trucks to haul, what traffic is going to increase, regarding dust, if you expand your operations how are you going to manage the dust, secondly, our land is our livelihood, this is our land that you are exploiting, people get away with a lot these days, if this is not your land you are visitors, you did not have a personal claim to it like us, how are you going to care for the land, reclaim it, how will you be the steward of the environment. That is very important. There are 5 communities affected, they need to have better information, exactly what changes you are proposing, it is confusing when changes happen and we arent told, also while youre working on this we who live in our communities we live in this land, you will be working with the world, prices will rise and fall, we know that. Many people are unable to work due to low levels of education, I dont see how you plan to increase your inuit employment, for instance if you have a train its called the Baffinland via rail, you have I think it would be good if you could say Baffinland which includes Igloolik, Pond Inlet, Arctic Bay, all the communities, not just Baffinland.	Regarding increased truck traffic and dust, through Phase 2 the intention is to move from trucking operation to rail operation, which means a decrease in truck traffic, so ore will be transported by rail with 5-8 trips along the rail line as opposed to hundreds of trucks along the tote road. So that is one measure we are putting in. We know the trucks on the road are causing dust along the tote road, so to clarify going from trucking to rail. Your concerns are valid and I appreciate you mentioning us being stewards and taking care of the environment. We have large environment monitoring programs we run earth year to understand how we are impacting fish, soil veg marine terrestrial wildlife, NRIB, DFO, etc. all look at our monitoring programs and provide insight into if changes need o be made. We take env stewardship very seriously and in terms of reclamation and how we intend the land to go back to habitat after its gone, we work with QIA and have developed closure and reclamation plans which dictate how we are going to clean up after we are done Include reveg studies, how we remove infrastructure, we have plans in place that are approved by the landowners through the QIA, but we have those in place already .You also mentioned how we increase Inuit employment, we have put into place additional training programs, QSTEP joint BIM QIA program, increased training, reinitiated work ready programs which are preemployment programs, committed to different funding, running apprenticeship at the mine site, lower people can shadow other people and move up on the job. Have seen a 70% increase in our employment numbers, are produ of that and want to ensure that Inuit who want to work will continue to work with us, so we work with partners, communities, to ensure that Inuit are continuing to be meploed. To our last point to include the communities, we very much appreciate the communities which we work with, we don't forget them, we want to ensure we come back and share info as it does or not does change, want an open forum and open dialogue, so I appreciate everyone's comments and for coming tonight.	2018-01-08 - Igloolik - Phase II Community Consultation
During the discussion of preliminary closure planning, participants provided the following comments: - It is too early to provide comments on closure. When the time comes, it will be different, and we may get the wrong idea now. Need to obtain community input when the plans are developed. - Consider potential for other mine projects to be developed and use the rail and other infrastructure. - If the rail line is developed from the south to the north port, consider giving it to an Inuit organization to operate. This could be used to transport commercial goods, or potentially used for tourism. This is a decision that should be made by Inuit at that time. - Is there the potential to extend the road to Pond Inlet? - There have been issues in the past with projects leaving equipment behind on the land. All equipment should be removed (do not treat the land as a dumpsite). - Rename the area of Mary River to the Inuktitut name (Old Mary River)	None.	2019-02-12 to 2019-02-14 – Trois Riviere, QC – Community Risk Assessment Workshop

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 324 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Appendix F

Lessons Learned from Other Projects

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 325 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Mine and port decommissioning, closure, and rehabilitation have been conducted at sites in the Canadian North for several decades. This time period has allowed the planning, permitting, closure, and post-closure performance to be evaluated. These include: Colomac Mine, Giant Mine, Diavik Mine, Ekati Mine, Faro Mine, Nanisivik Mine/Port. As part of its reclamation researched initiatives, Baffinland is committed to establishing the primary lessons learned from these examples and others, to help evaluate options related to, but not limited to: re-vegetation strategies; post closure property control and land use; stakeholder relationships and commitments; residual waste material management; post-closure maintenance (if required); water management (before, during, and after closure), and managing socio-economic impacts. An initial summary of lessons learned from some of these projects is compiled below. Understanding the relevant lessons learned at comparable sites will be an ongoing process as part of the closure planning process, future updates will be added as applicable.

Table F-1: Lessons Learned from Other Projects

Development	Activity Leading to Lesson	Lesson Learned	Management Result
Ekati Diamond Mine, Diavik Mine - NWT	Placement and covering of mine rock piles and waste.	Permafrost develops rapidly within mine rock piles with an active freeze/thaw layer, additional run-off and infiltration of water without proper cover.	The use of mine rock piles will limit the quantity of impacted seepage due to exposure to freezing surface temperatures and permafrost aggradation. Placement of an engineered cover over storage areas will promote surface runoff and further limit infiltration and water contact. Waste rock deposition sequencing in winter (max lift thickness).
Ekati Diamond Mine, Diavik Mine - NWT	Revegetation research studies.	Revegetation and planting in northern regions has generally been across long time lines, or often with uncertain success.	Site re-contouring has also improved natural recovery at the Ekati and Diavik Mines.
Ekati Diamond Mine, Diavik Mine, Snap Lake Mine - NWT, Jericho Project - Nunavut	Caribou concerns and mine site infrastructure	Caribou are known to use artificial habitats created by mine structures (e.g., roads, mine waste piles). Caribou travel through and around the mine site during migration. There is a potential for caribou passage to be impeded or for caribou to be hurt or killed by mining operations. Structures and	Road and rail crossings designed for the northern transportation corridor at expected caribou travel routes.

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 326 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Development	Activity Leading to Lesson	Lesson Learned	Management Result
		rock piles may also provide a means of shelter avoiding insects. Fencing can lead to caribou mortality from entanglement. Fences can be used by predators to limit escape options of their prey.	
Con Mine - NWT	Site surface and infrastructure.	Certain infrastructure discussed in ongoing engagement may provide value to the local community, or third parties.	Opportunities for beneficial ongoing use of primary infrastructure including airstrip, road, rail embankments, and docks have been considered in engagement discussions to date.
Ekati Diamond Mine - NWT	Operational monitoring programs.	Monitoring programs in place at site are effective in detecting changes.	The operational monitoring programs can be used to design effective post-closure monitoring programs.
Ekati Diamond Mine - NWT	Progressive reclamation of older infrastructure.	The importance of treating closure and reclamation activities as projects is integrated into mining operations.	This learning is incorporated into approach taken for planning, resourcing, and execution of future progressive reclamation, and final reclamation efforts.
Minto Mine-Yukon	Progressive reclamation measures linked to operational development plans for waste rock storage, overburden dumps and tailings management areas	Reduced financial liability for closure costing and bonding.	Review operational plans and procedures to incorporate rigorous assessment and implementation of progressive closure measures. Baffinland's progressive rehabilitation measures proposed as part of the ICRP are expected to be technically and economically feasible and reflect Project closure principles
Giant Mine - NWT	Baker Creek Reach 4 Re-alignment	Frozen material exposed during excavation melted and caused settlement of excavated areas.	Characterization of frozen materials is needed for sensitive excavations. This includes road and rail construction areas.
Ekati, Diavik, Snap Lake Mines - NWT	Underestimated groundwater inflows in initial site water quantity and quality predictions.	All three mines were developed where zones of enhanced permeability persisted, which led to underestimation of groundwater inflows, and in some cases the volume of high TDS water requiring management at surface.	Assessing the water-balance for the proposed Open Pit and timelines for it's enhanced flooding is a priority of closure planning (see Appendix D)

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 327 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Development	Activity Leading to Lesson	Lesson Learned	Management Result
Faro Mine-YK, Colomac -NWT, Gahcho Kue - NWT	Flooding of open pits, and establishment of meromictic conditions to isolate poor quality water generated during mining.	Poor water quality (e.g. acidic water, high TDS water) can be isolated at the bottom of the pit when meromictic conditions are present in the flooded pit lake.	Considerations for poor quality water, density differences, high TDS mine water at the bottom of the pit and low TDS overlying freshwater cap, as well as the pit geometry may affect homogenization of pit water following closure.
Cartier Mining, ArcelorMittal, Alaskan Railway, Churchill-Manitoba, Scandinavia and Tibet railway systems	Railway operations in northern regions that are affected by permafrost conditions.	Cold climate conditions and extremities vary across different regions when considering design and implementation of rail systems.	Baffinland will draw from experience of previous railway operators in northern conditions. Baffin Island extreme cold lasts 5 to 6 months. One consideration is strategic management of operation and maintenance crews including rapid rotations at project site during extreme cold conditions.
Ekati Diamond Mine, Diavik Diamond Mine, Gahcho kue-NWT	Remediation hydrocarbon-contaminated material during operations and immediately after contamination occurs	Hydrocarbon-contaminated soil material is expected during operations. Establishing a land treatment area for hydrocarbon contaminated soils during operations ensures prompt cleanup, remediation of material, and reduced closure liability.	The Milne Port landfarm package includes the landfarm containment area and the contaminated snow containment area constructed south of the accommodation camp, near the Milne Inlet Quarry (Q1). The landfarm containment area was constructed to store/remediate the petroleum hydrocarbon (PHC) contaminated sand/gravel materials Remedial efforts for these impacted materials will be a priority for Baffinland..

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 328 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Appendix G

Residual Effects

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 329 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

G.1 Predicted Residual Effects

Residual effects refer to the remaining environmental effects identified for the Project, post-mitigation, at the expected closure period of the Project. Based on the information presented in the Mary River Project FEIS, the Mary River Project as approved will have no significant adverse residual effects for the VECs identified within the biophysical environment. The Project is not expected to compromise the ecosystematic integrity of the Nunavut Settlement Area. In addition, no significant adverse residual effects are predicated to occur to VSECs identified within the socio-economic environment, and the Project is expected to have significant positive effects for most of the VSECs. This position is supported by comprehensive site-specific studies (baseline and modeling studies), IQ, extensive public consultation, and expert opinions. The Phase 2 Proposal assessed proposed additions to the scope of the Project, and also concluded no significant adverse residual effects.

An overview of the assessment methodology used to develop this residual effect position, as detailed in Volume 2 of the Mary River Project FEIS, and carried forward in the ERP and Phase 2 Proposal Addendums, is provided in Section G.2. A summary of the non-significant residual effects identified for each VEC and VSEC as part of the Mary River Project FEIS is provided in Section G.3. Section G.4 includes an overview for Baffinland's approach to ongoing assessment of the predicted residual effects.

Further detail of the Project residual effects is presented in relevant TSDs within the Phase 2 Proposal.

G.2 Residual Effects Assessment Methodology

G.2.1 *Determining Significance of Residual Effects*

One of the underlying purposes of the EIS is the assessment and determination of significance of the residual effects and their acceptability to Inuit communities and the Project stakeholders. As directed by the Guidelines (NIRB 2015), determination of significance considers the following criteria.

- Direction or nature of an effect (i.e., positive/beneficial versus negative/adverse);
- Magnitude and complexity of an effect;
- Extent of the effect, including the geographical area that will be affected, the size of the affected human populations, and/ or the size of the affected wildlife populations and habitat;
- Frequency and/or duration of an effect;
- Reversibility or irreversibility of an effect;
- Probability or likelihood of occurrence of the effect; and
- The level of confidence in the effects prediction.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 330 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

These criteria were carried forward in the Phase 2 Proposal assessment, as specified in the Guidelines. Additional attributes are considered, if and as applicable, in the assessment of the VECs/VSECs. The residual effect (i.e., after mitigation is applied) is described within the detailed assessments of the residual effects from the Project are presented in the various TSDs. The findings of these assessments are summarized in Table G.4 below. Section 90 of NuPPA lists factors to be considered in determining the significance of impacts. Certain factors, listed below, are the same for all VECs and are unchanged from the Approved Project:

- The ecosystematic sensitivity of the area;
- The historical, cultural, and archaeological significance of the area; and
- The size of the human and the animal populations likely to be affected by the effects.

The remaining factors are included in Table G.4.

Definitions and assessment criteria for each are identified in Table G-1, which lists the complete set of attributes (criteria and qualifiers), provides a definition and rationale as well as a summary of their relevance or context to the Mary River Project, and describes how the attribute was incorporated into the assessment.

Table G-1: Attributes Used to Evaluate Significance of Residual Effects

Attribute	Definition and Rationale	Role in Significance Determination²
Direction and Nature ¹	The ultimate long-term trend of an environmental effect - positive, neutral, or negative.	Qualifier Only negative effects are assessed for significance
Magnitude ¹	The amount or degree of change in a measurable parameter or variable relative to existing conditions (the exposed population) ³ . This attribute can also consider complexity - the number of interactions (Project phases and activities) contributing to a specific effect.	Primary Criterion High magnitude = high significance Secondary Criterion If magnitude and geographic extent are related, the higher the potential significance
Extent ¹	The geographic area over which the interaction will occur.	Secondary Criterion The larger the zone of influence, the higher the potential significance
Frequency ¹	The number of times during a project or a project phase that an interaction or environmental effect can be expected to occur.	Secondary Criterion Greater the frequency of occurrence, the higher the potential significance

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 331 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Attribute	Definition and Rationale	Role in Significance Determination ²
Timing	The Project Phase within which the environmental effect will occur.	Qualifier Provides context
Duration ¹	The period over which the environmental effect will occur.	Secondary Criterion The longer the duration of an interaction the higher the potential significance
Reversibility ¹	The likelihood that a VEC/VSEC or Indicator will recover from an environmental effect, including consideration of active management techniques. Reversibility is considered for biological VECs at the population level. Therefore, although an effect like mortality is irreversible, the effect at the population level might be reversible.	Primary Criterion The greater the potential to reverse an effect, the lower its potential significance
Probability ¹	The likelihood that an interaction and a consequent effect will, in fact occur.	Qualifier (considered only for potentially significant effects) The higher the probability of occurrence, the greater the significance
Certainty ¹	The level of confidence in the knowledge or analysis that supports the prediction, in particular with respect to limitations in overall understanding of the ecosystem, and limitations in the ability to foresee future events or conditions.	Qualifier (considered only for potentially significant effects) The lower the certainty of occurrence, the more conservative the approach to prediction of significance
Ecological/Socio-economic context/value ¹	The general characteristics of the area in which the Project is located, as indicated by existing levels of human activity and associated types of disturbance. Interpreted to mean the basis for assigning "value" to the particular VEC.	Qualifier VECs/ VSECs and Indicators have been identified as "valued"
Environmental Sensitivity ¹	Environmental sensitivity of the area likely to be potentially affected. Refers to areas of heightened sensitivity that will be identified where applicable in relation to the	Qualifier The Magnitude of an effect within an area of environmental sensitivity will be greater; therefore environmental sensitivity

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 332 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Attribute	Definition and Rationale	Role in Significance Determination ²
	Project (i.e., areas sensitive to spills; caribou calving areas).	is considered in the discussion and rating of the Magnitude attribute.
Historical, cultural, archaeological significance ¹	To be considered within the geographic area to be potentially affected	Qualifier (Extent - above) Historic, cultural and archaeological significance is evaluated within the archaeology effects assessment (Volume 4)
Human and wildlife populations, and the size of the affected wildlife populations and related habitat ¹	The size of the potentially affected human populations; and the size of the potentially affected wildlife populations and related habitat.	Qualifier (Extent - above)
The extent of the effects of the project on other regional human populations and wildlife populations, including the extent of the effects on Inuit harvesting activities ¹	The Project might have the potential to affect other human and wildlife population, if there are residual effects to marine wildlife or socio-economic benefits that extend outside Nunavut.	Qualifier Consider within the Transboundary Effects Assessment (FEIS Volume 9, Section 4; Phase 2 Proposal, TSD-27)
The potential for cumulative adverse effects given past, present and future relevant events ¹	The Project might have the potential for cumulative effects where residual effects from the Project are expected to occur.	Qualifier Consider in the Cumulative Effects Assessment (FEIS Volume 9, Section 1; Phase 2 Proposal, TSD-27)
Ecosystem function and integrity ¹	Ecosystem function and integrity is important to identified VECs and humans.	Qualifier Outcome of the significance determination
The effect on the capacity of resources to meet present and future needs (sustainability) ¹	The sustainability of this Project, and any major industrial project, is an important element to assess.	Qualifier Outcome of the significance determination
Value ¹	The value attached to the affected VEC or VSEC by those who identified them. An environmental or socio-economic component was identified as “valued” and was addressed in the EIS if it was found to have a high value to communities.	Qualifier Addressed as part of Issues Scoping where the “value” of each component is considered. The value attached to a VEC or VSEC is more or less equivalent to “Sensitivity” described above.

NOTES:

- Specifically required by NIRB guidelines.
- Criterion – directly contributes to the determination of significance. Primary criteria are given greater weight than secondary criteria. Qualifier – acts as a modifier to be considered when assigning values/rankings to assessment criteria.
- In the majority of cases there is either a poor or no estimate available of the total population. However, for the purpose of undertaking an environmental assessment, an effects prediction can be made by making reasonable assumptions. The most common approach is to take an area that is less than the full range of a population and, often on the basis of density estimates (or by using habitat as an indicator), a conservative prediction is possible, i.e. If the effect is calculated for a portion

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 333 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

of the population and it results in a magnitude of effect that is beneath a defined threshold, then it is reasonable to predict the effect on the entire population, even in the absence of a total population estimate. This approach is not greatly different from that used by resource managers that have the mandate to manage wildlife populations, who are challenged to develop harvest quotas, even where they do not have an accurate or complete population estimate available to support these decisions.

G.2.2 Rating Criteria of Residual Biophysical Impacts

For the categories for criteria and qualifiers applied directly to the determination of significance for residual biophysical effects, with due consideration to the NIRB requirements cited above, see Table G-2.

Table G-2: Ratings for Evaluating Residual Biophysical Effects

Criteria	Classification	
Magnitude (Specific to the VEC and the impact)	Level I	An effect on the exposed indicator/VEC that results in a change that is not distinguishable from natural variation and is within regulated values
	Level II	An effect that results in some exceedance of regulated values and/or results in a change that is measurable but allows recovery within one to two generations
	Level III	An effect predicted to exceed regulated values and/or results in a reduced population size or other long-lasting effect on the subject of assessment
Extent The physical extent of the effect, relative to study area boundaries	Level I	Confined to the LSA
	Level II	Beyond the LSA and within the RSA
	Level III	Beyond the RSA
Frequency How often the effect occurs	Level I	Infrequent
	Level II	Intermittent
	Level III	Frequent or continuous
Duration The length of time over which a Project effect will occur	Level I	Short-term (effect lasts up to four years)
	Level II	Medium-term (up to 25 years, for the life of the Project)
	Level III	Long-term (beyond the life of the Project) or permanent
Reversibility The likelihood of the VEC to recover from the effect	Level I	Fully reversible
	Level II	Reversible with cost/effort
	Level III	Irreversible
Qualifiers		
Certainty Limitations in the overall understanding of the ecosystem and ability to predict future conditions	High	Baseline data are comprehensive; predictions are based on quantitative data; effect relationship is well understood
	Medium	Intermediate degree of confidence between high and low
	Low	Baseline data are limited; predictions are based on qualitative data; effect relationship is not well understood
Probability The likelihood that the predicted impact/residual effect will occur	Unlikely	Less than 20% likelihood of occurrence
	Moderate	Between 20 and 60% likelihood of occurrence
	Likely	Over 60% likelihood of occurrence

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 334 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Each of the five criteria contributes to the determination of significance. Criteria are categorized in three levels (Levels I, II, and III), where Level I is indicative of a negligible or limited potential to contribute to an overall significant environmental effect, and Level III is indicative of a high potential. Level II represents the intermediate condition.

G.2.3 Rating Criteria for Residual Socio-Economic Impacts

Similar criteria were applied to the socio-economic effects assessment with some modification and additional criteria in consideration of the nature, complexity, and multiple perspectives associated with socio-economic issues. For the attributes (criteria and qualifiers) identified as the determinants of significance of socio-economic effects, see Table G-3.

Table G-3: Rating Criteria for Evaluating Residual Socio-Economic Impacts

Criteria	Classification
Direction	Positive
	Variable
	Negative
Geographic Extent	Description of the area and communities most affected
Social Extent	Demographic groups or social units identified as most affected
Magnitude Intensity of the effect	Low
	Moderate
	High
Frequency How often the effect occurs	Infrequent
	Intermittent
	Continuous
Duration Length of time over which a Project effect will occur	Short-term (less than four years)
	Medium-term (up to 25 years, life of the Project)
	Long-term (beyond the life of the Project)
Reversibility Likelihood of recovery from effect	Reversible
	Partly reversible with cost/effort
	Irreversible

G.3 Residual Effects Predicted at Planned Closure

Using the methodology presented in Section G.2, the predicted residual impacts were assessed and the associated consequences were evaluated for each impact to a VEC or VSEC. Although no significant adverse residual effects were predicted for the Project at planned closure, this section provides a summary of all predicted residual impacts that were expected to exist during closure and beyond the closure of the Project site for both VECs and VSECs. Table G-4 provides a tabular summary of residual effects.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 335 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Residual impact criteria (e.g., direction, magnitude, reversibility, etc.) noted in the following sub-sections are defined in Section G.2. Complete details including the environment consequence calculations, residual impact criteria classification, probability of occurrence and level of confidence all VECs and VSECs are presented in the Mary River Project FEIS, FEIS Addendum and the Phase 2 Proposal. Updates to the residual impacts assessment (referred to as “residual effects” within the Phase 2 Proposal) were completed as part of the Phase 2 Proposal EIS; however, no changes to residual effects during closure and post-closure were identified as part of this addendum. The evaluation of closure and post-closure residual effects associated with the Phase 2 update was primarily qualitative, and results are summarized in criteria (i.e. duration of effect, reversibility) which are presented in Table G-4. Additional detail can be found in the relevant TSDs associated with each of the VEC/VSECs.

The limited change in results for predicted post-closure effects reflects the minimal changes expected during operations from the Phase 2 Proposal activities relative to the approved project, or in some cases changes to that are positive in direction (e.g. air quality improvements associated with the change to rail operations from trucking, water quality improvements at the Mine Site due to changes in secondary ore processing). At the Waste Rock Stockpile and Open Pit areas, which have identified uncertainty with respect to post-closure residual effects, no substantial changes in project activities are associated with the Phase 2 Proposal and updated predictions for closure were not undertaken.

G.3.1 *Project Effects on VECs*

The Phase 2 Proposal design sought to minimize the interactions of the Project with the natural environment and to implement measures to minimize the potential negative effects of interactions. With these measures in place, the effects of the Phase 2 Proposal on the natural environment overall was assessed as not significant. The following sections summarize key project interactions and mitigation measures that will be implemented.

G.3.2 *Atmospheric Environment - Climate change; Air quality; Noise and vibration*

Climate change is predicted to have little effect on the very cold and deep permafrost conditions in the area over the planned life of the Approved Project. The Phase 2 Proposal facilities will also be designed to account for any changes in site conditions induced by climate change. The Phase 2 Proposal activities will produce Greenhouse gases. Releases of Greenhouse gases from the Project are anticipated to be small in comparison to Nunavut and Canadian totals and the Phase 2 Proposal will reduce current emissions by use of rail over road ore transport. Greenhouse gas releases will not have a measurable effect on global climate change.

Ore handling, as well as driving on access roads, and emissions from power plants, trucks, and camp incinerators will affect air quality through the generation of particulates and other gaseous emissions. The use of low-sulphur arctic diesel fuels and ensuring modern emission controls on equipment will reduce these emissions. As well, air pollution controls such as dust suppressants will prevent significant effects

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 336 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

on air quality. Once the railroad is constructed and operating, it will replace trucking as the method of transporting the ore from the mine to the port, and dust emissions from ore transportation will be reduced. With the Phase 2 Proposal, secondary crushing will be moved from the Mine Site to Milne Port, where it will be enclosed, reducing dust emissions.

Phase 2 Proposal activities will increase noise levels but these will be limited to areas close to the activities. As well, the use of mufflers and regular maintenance of engines and equipment will prevent significant noise levels.

G.3.3 *Land Environment: Landforms, soil and permafrost; Vegetation; Terrestrial wildlife and habitat; Birds*

Sensitive landforms in the Project area include frozen soils that contain ice lenses or areas that could shift under pressure. Sensitive landforms will be avoided or appropriate engineering designs will be used to protect the sensitive areas. During site preparation adequate drainage to prevent water pooling during thaw periods will be used.

The design of all Phase 2 Proposal facilities minimizes the amount of land that the Project needs to disturb. Thus the amount of vegetation that is affected is minimal compared to the amount of vegetation cover in the North Baffin. Numerical modelling was done to predict the amount of dust that could settle on the vegetation in the area and these studies concluded that the dust suppression actions would prevent impacts on plants.

Caribou are the main indicator species used to assess potential effects on terrestrial animals. The main project interaction with caribou would be when caribou cross the road or rail lines. Although it is possible that individual caribou could be involved in collisions with trains or trucks, these numbers are expected to be limited and will not be significant compared with total numbers in the region. Several measures are in place to avoid collisions with caribou. Strict speed limits will be in place for trucks and trains, thus decreasing the probability of collision. Trucks will be required to stop if wildlife is observed on or next to the road. No sightings have been made at the Project sites.

There are many birds through the region and a small amount of habitat loss for migratory birds is expected to result from Phase 2 Proposal activities. These are not expected to lead to effects on populations of key species such as peregrine falcons, snow geese, eiders, and loons. Prior to initiating Phase 2 Proposal activities, nests and nesting areas will be identified and mitigation will be implemented to avoid direct effects to birds and bird habitat.

G.3.4 *Freshwater Environment – Surface water and sediment quality; Water quantity; Freshwater fish, fish habitats and other aquatic organisms*

A number of proven mitigation measures have been included in the Phase 2 Proposal to reduce potential effects on water quality, freshwater fish, fish habitat, and other aquatic organisms. Specific Management Plans detail the many ways that water will be protected.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 337 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Water use will be reduced to the minimum necessary and all used water will be tested and if required treated before it is released back to the environment. Sewage treatment facilities will ensure that all discharged water satisfies established standards. Run-off water from fuel storage and maintenance facility areas will be contained and wastewater from truck and rail maintenance facilities and explosives equipment-washing facilities will meet established standards before being discharged to the natural environment. An Emergency and Spill Response Plan will be in place and will ensure that there is prompt and appropriate clean-up of any spills should they occur.

In response to the non-compliant discharges from the Waste Rock Facility (WRF) in 2017, Baffinland has taken multiple corrective actions to prevent additional non-compliant discharges from the WRF and retained Golder Associates (Golder) to determine the appropriate corrective actions required to address the seepage observed at the WRF in 2017 and investigate the potential for ARD and develop mitigation measures, as required. Actions completed in 2018 include installation of a water treatment system to manage captured runoff at the WRF pond and installation of thermistors and oxygen sensors to monitor the thermal profile, freezeback rates and oxidation of the WRF. In 2019 Baffinland will continue work at the WRF, including upgrading the WRF pond to address seepage and expand capacity and updating the Interim Waste Rock Management Plan. The revised plan will outline the management of waste rock and surface water at the WRF for the next five years and will incorporate geochemistry data collected during field programs in 2018 and 2019, updated water quality modelling results and lessons learned from the 2017 events.

The Tote Road and North Railway crosses a large number of watercourses and a portion of these contain fish habitat. New bridges will be constructed, and many culverts will be replaced and will be designed to limit barriers to fish movement. A habitat compensation plan is included as part of the assessment.

G.3.5 Marine Environment – Sea ice; Marine water and sediment quality; Marine habitat and biota; Marine mammals

At Milne Port, near-shore, including port activities, will be carefully managed to protect the marine environment. All sewage and wastewater from maintenance facilities and explosive residues will be treated before discharge and runoff from port site areas will be contained and monitored for water quality before discharge. Ship to shore fuel transfers will take place following the Canada Shipping Act regulations.

Pile driving during construction at the Milne Port has the potential to create an acoustic disturbance, which could affect the marine environment. Mitigation will be used to dampen sound transmission and marine mammal monitoring to avoid pile driving when marine mammals are present. Auditory disturbances are not expected to affect marine biota and mammals at the population level.

Shipping from Milne Port will be mainly during a nominal shipping window from July 1 to November 15, with a caveat that Baffinland will not break through landfast ice. Ore carriers will carry ballast water during

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 338 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

their inbound trips to Milne Port. This water is required in order to keep the vessels stable and at an even draft. Ballast water will be managed in accordance with the Canada Shipping Act and its regulations which require mid-ocean exchange of ballast water. The water is pumped overboard as the vessels approach Milne Port. Ballast water will only be slightly different (in temperature and salinity) from the water in the Inlet. Modeling has shown that discharge will not alter the quality of water in Milne Inlet. There is a concern that ballast water could result in the unintended introduction of invasive species. Adherence to strict protocols developed by regulatory agencies will mitigate this concern.

The key marine mammal species include narwhals, beluga whales, and bowhead whales. Effects of Phase 2 Proposal activities were assessed for these species as well as ringed seals, bearded seals and walruses.

There is potential for acoustic disturbance from ship noise along the Northern shipping route as well as vessel strikes on marine mammals which can cause serious injury or mortality through physical harm. With respect to the Northern shipping route, ringed seals, narwhal, beluga whales and bowhead whales may all be expected to encounter ship traffic in low to high frequencies. There have been no vessel strikes to date with marine mammals. Polar bears and walruses are infrequent along the Northern shipping route in the open water season and are, therefore, not expected to experience acoustic disturbances from ship noise or vessel strikes. Given the relatively low likelihood and short duration of encounters between marine mammals and vessel traffic, acoustic disturbances are not expected to affect marine mammals at the population level. To mitigate potential vessel strikes, the Phase 2 Proposal includes mandatory nautical instructions including reduced speed limits when transiting within Milne Port or along the Northern shipping corridor, and the maintenance of a constant course and speed when in transit. Given the planned mitigation, and low likelihood for marine mammal vessel strikes, vessel strikes are not expected to affect marine mammals at the population level.

Ringed seals are present year-round along the northern shipping route, including the Milne Port site. Shipping and most construction activities at the Milne Port site will occur during the open-water period, which avoids pupping, nursing, mating, and moulting. Ringed seals are generally tolerant of industrial activity and shipping. The effects of Phase 2 Proposal activities on ringed seals are considered minor and are expected to occur in a localized area.

Bearded seals are expected to occur in small numbers along the northern shipping route during the open-water periods given that they predominately occur in areas of pack ice. Shipping during the Phase 2 Proposal does not overlap with bearded seal pupping and nursing. If bearded seals do occur along the northern shipping route or near the Milne Port, they may exhibit localized avoidance of shipping and construction activities. Given the small numbers of bearded seals expected to occur in Eclipse Sound and Milne Inlet, and the planned mitigation measures, predicted impacts are not significant.

Walruses may occur in small numbers along the northern shipping route during the open-water period. If walruses do occur along the northern shipping route or near the Milne Port, they may exhibit localized

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 339 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

avoidance of shipping and construction activities. Given the small numbers of walrus expected to occur in Eclipse Sound and Milne Inlet, and the planned mitigation measures, predicted impacts are not significant.

Narwhals are present along the northern shipping route primarily during the open-water period when about 20,000 animals summer in the Eclipse Sound and Milne Inlet area. Narwhals are thought to calve and perhaps feed in this summering area. While there is little information on how narwhals respond to vessel traffic—there are relevant observations in the Milne Inlet area that indicated that narwhals exhibited variable responses to vessels (including the passage of an ore carrier, fuel tanker and sea lifts). Observations, including through the Bruce Head shore-based monitoring program, which involves local Inuit as observers, suggest that some narwhals may have left certain areas after a ship's passage but that others did not. It is predicted that narwhals will exhibit localized avoidance of ore carriers along the northern shipping route and vessel traffic in the Milne Port area. Potential effects are expected to be reduced by decreasing ship speed and hence, minimizing sound levels. Narwhals are predicted to habituate to repeat passages of ore carriers along the northern shipping route. Ongoing monitoring will be conducted to detect unexpected effects on narwhals and to identify any additional mitigation measures.

Beluga whales occur in relatively small numbers in Eclipse Sound and Milne Inlet during the open-water period. Beluga responses to vessels during periods of open water are variable, ranging from tolerance to avoidance, and likely depend on the type of vessel and its speed and course, and the whales' activity and previous exposure to industrial activity. It is likely that belugas will exhibit localized avoidance of ore carriers along the northern shipping route. Effects are expected to be reduced by decreasing ship speed. It is predicted that belugas will habituate to repeat passages of ore carriers along the northern shipping route. To address the uncertainty with this prediction ongoing monitoring will be conducted to detect unexpected effects on belugas and to identify any additional mitigation measures.

Bowhead whales regularly occur along the northern shipping route, and it is thought that this summering area is used for feeding. Behavioural responses to shipping activity by bowhead whales are variable and appear to depend on the whale's activity and the type of vessel. Based on previous studies, bowheads will likely avoid at least the immediate area around ore carriers and that effects can be minimized by reducing ship speed and by vessels maintaining a constant course and speed. It is predicted that bowheads will exhibit localized avoidance of ore carriers along the northern shipping route. It is predicted that bowheads will habituate to repeat passages of ore carriers along the northern shipping route. To address the uncertainty with this prediction ongoing monitoring will be conducted to detect unexpected effects on belugas and to identify any additional mitigation measures.

Polar bears occur along the northern shipping route throughout the year in relatively small numbers. Phase 2 Proposal activities will primarily occur during the open-water period and as such will not overlap with polar bear denning and mating. Bylot Island and coastal Baffin Island are used as summer retreats by

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 340 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

polar bears. Polar bears are expected to avoid ships and the port site; however, they may also approach these areas. Project personnel will be educated about bear safety and the strict management of waste will reduce the chances of human bear interactions. Polar bear monitors will be hired to ensure worker safety.

G.3.6 *Project Effects on VECs*

The Phase 2 Proposal will provide many potential social and economic benefits to the residents of North Baffin. These will arise from employment and training opportunities as well as from opportunities for businesses and from payments made to government and Inuit organizations. Careful planning is needed in order to improve the ability of people to attain these opportunities. Individuals and families will also require support as they cope with the challenges associated with the fly-in/fly-out style of life and with the wealth and financial responsibilities that come with this lifestyle. The assessment of valued socio-economic components is an important way to identify issues and develop appropriate mitigation measures. Overall the Phase 2 Proposal represents important and significant socio-economic benefits to Nunavut.

G.3.7 *People: Population demographics; Education and training; Human health and well-being*

The potential for the Phase 2 Proposal to cause non-Inuit migration into communities, as well as the potential for Inuit to move out of the communities as a result of the Phase 2 Proposal was assessed. Neither of these possibilities is identified as significantly affecting the composition and numbers of the North Baffin populations or the community social fabric.

Baffinland's education and training commitments will help upgrade the skills of North Baffin residents. Baffinland is committed to supporting training programs that will enable residents of nearby communities to develop the skills needed to qualify and perform jobs at every level of the Phase 2 Proposal operation. Baffinland has been actively pursuing education and training partnership initiatives. Baffinland and the QIA recently developed the Q-STEP training program, a four-year initiative that will be undertaken by QIA in close partnership with Baffinland to provide Inuit with skills and qualifications to meet the employment needs of the Mary River Project as well as other employment opportunities in the region.

The Approved Project was predicted to deliver positive effects related to education and training through access to industrial work supported by pre-employment preparation and on-the-job training for young adults, incentives related to school attendance and success, and opportunities to gain skills. Monitoring supports that these predictions are being realized by individuals employed by the Project and their families (TSD-27). While the development of an adequately trained and skilled Inuit workforce will take time to achieve, Baffinland expects that training programs will eventually contribute to the development of a stronger local workforce and economy. Monitoring supports that these predictions are being realized by individuals employed by the Project and their families.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 341 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

The rotation schedule is two weeks in two weeks outs. The challenges associated with fly-in/fly-out operation are recognized. Steps will continue to be taken to help workers and families to succeed in this type of work environment. Orientation and training will continue to be provided to help workers and families adapt to the work rotations and improve money management practices.

Concerns are sometimes raised about the potential effects of the Phase 2 Proposal or the Approved Project on the transport of illegal substances through Project sites and on the affordability of such substances. To counter the possibility of increased substance abuse the company has a strict no drug–no alcohol policy. Addiction counselling will also be available.

G.3.8 Community: Community infrastructure and public service; Cultural Resources; Resources and land use; Governance and leadership: Livelihood and employment; Cultural Well-being

The Project is expected to create competition for skilled workers. Hamlets have expressed concern that they may face difficulty in hiring the people they need to deliver local services. However, employment experience and ongoing training will significantly improve labour force capacity helping to equip local residents with the qualifications and experience. As a result, increased competition for workers will be balanced by increased capacity.

The Phase 2 Proposal will be making use of the public airstrips at Iqaluit and at the five nearest communities for transporting workers to and from worksites. The Phase 2 Proposal’s transportation plans will be designed to avoid placing demands on the airport’s facilities beyond its capacity. Some increased demand for infrastructure is also expected to arise indirectly due to the Phase 2 Proposal. For example, increased wealth might lead to more vehicles and a need for road improvements.

Education and training as well as on-the-job work experience and counseling will develop leadership skills that will significantly improve local governance. The participation of community residents and leaders in agreement negotiations with Baffinland and in initiatives to identify key indicators for regional monitoring programs has already contributed to local community leadership development.

Measures will continue to be taken to respect and preserve the culture of Inuit employees while they are working. Policies that encourage respect of other cultures and diversity are in place. Baffinland supports the use of Inuktitut onsite, for signage and in work units. Traditional country foods will be provided in the Project cafeterias. Policies encouraging safety, employment equity, and, preventing harassment will be strictly enforced.

Archaeological sites have been identified in Phase 2 Proposal areas that contain features and artifacts representing substantial degrees of area use throughout the human past to the present. A number of important archaeological sites will be avoided by relocating Phase 2 Proposal infrastructure, and others will require protection through excavation, mapping, and artifact retrieval by a licensed archaeologist.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 342 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

The Phase 2 Proposal will interact with existing land uses by Inuit. Measures to support these activities include check-in procedures at Phase 2 Proposal sites and a focus on public safety for the Milne Inlet Tote Road.

G.3.9 Economy: Economic development and self-reliance; Contracting and business opportunities; Benefits, taxes and royalties

Direct and indirect economic growth generated by the Phase 2 Proposal will create new opportunities for employment and business. The Phase 2 Proposal will enhance labour force capacity and may increase Inuit business capacity. Businesses may gain opportunities to expand through the supply of business services to the Phase 2 Proposal as well as indirectly through an expanded market for consumer goods and services. Baffinland will help Inuit firms, and in particular smaller Inuit firms located in communities in the Baffin Region to develop capacity to bid on and carry out contracts for the Phase 2 Proposal.

The Phase 2 Proposal will provide substantial cash payments to Inuit organizations and to government. These will arise through the Inuit Impact and Benefits Agreement with QIA as well as through royalty payments for the iron ore made to NTI. Payments to the Government of Nunavut will arise from fuel taxes, property taxes, and taxes on the profits earned by Baffinland. Some of these payments will start as early as the construction phase, while other payments will not kick in until later in the operations phase.

Through its contribution to human skills, to household wealth and to economic growth, the Phase 2 Proposal will support achievement of overall economic development goals, including progress toward improved self-reliance of individuals, communities, and the territory.

G.3.10 Cumulative and Transboundary Effects

Consideration was given to potential cumulative effects from reasonably foreseeable projects. For the Approved Project, the main potential cumulative effects are thought to arise if development of the Mary River Project would lead to further iron ore production up to twice the currently proposed production rate. Other projects in the area will have only minor cumulative effects. A doubled production rate of one or more other deposits would increase effects to a number of valued ecosystem and socio-economic components, but not to the extent that any of the cumulative effects are expected to be significant. In relation to the Approved Project, the Phase 2 Proposal presents no significant cumulative effects.

Transboundary effects to marine mammals would occur as a result of shipping, however, because the effects to marine mammals within the study area are not significant, the transboundary effects are similarly not significant. Socio-economic effects will occur in other jurisdictions of Canada as a result of employment of the Phase 2 Proposal by people living outside of Nunavut. However, these effects are not deemed significant.

Table G-4: Summary of Residual Effects

VEC/VSEC	Key Indicator	Potential Effect(s)	Mitigation, Monitoring, Environmental Management, and Follow-up	Characterization of Residual Effect(s)	Significance Rating	Cumulative Effects	Transboundary Effects
Atmospheric Environment VECs							
Meteorology and Climate (including Climate Change)	Greenhouse gases (GHGs): - Carbon dioxide (CO₂) - Methane (CH₄) - Nitrous oxide (N₂O)	Increase in GHG emissions	Review, update, and implement the Climate Change Strategy as necessary to incorporate GHG reduction, climate change adaptation, and monitoring and collaborative research initiatives specific to the Phase 2 Proposal.	Releases of GHGs from the Project are small in comparison to Nunavut and Canadian totals and will partially mitigate current emissions by use of rail over road transport of ore. GHG releases will not have a measurable effect on global climate change. Overall, the residual effect of the Project on climate change is predicted to be: - Adverse in direction (the Project will result in GHG emissions); - Low in magnitude (not expected to contribute notably to Canadian or global GHG totals or global climate change); - Geographically widespread (GHGs cause a global effect); - Continuous in frequency; and - Irreversible (following cessation of Project GHG releasing activities the GHGs will remain in the atmosphere for 20 years or more). There is a high probability of the residual effect occurring.	Not significant	Not significant	Not significant
Air Quality	Criteria air contaminants (CACs): - Total suspended particulate (TSP) - Sulphur dioxide (SO₂) - Nitrogen dioxide (NO₂) - Carbon monoxide (CO) - Sulphur and nitrogen deposition and potential acid input (PAI) - Particulate matter <2.5 µm (PM_{2.5}) - Particulate matter <10 µm (PM₁₀) - Fugitive dust and metal concentrations and deposition	Increase in CACs	- Review, update and implement the following plans, targeting dust suppression along the Northern Transportation Corridor: - Environmental Protection Plan; - Air Quality and Noise Abatement Management Plan; - Dust Management Protocol in the Roads Management Plan; and - the dust fall monitoring program outlined in the Terrestrial Environment Mitigation and Monitoring Plan.	Concentrations of SO ₂ , NO ₂ , and CO are not predicted to exceed thresholds outside of the PDAs. Exceedances of TSP are predicted under certain conditions. However, no exceedances are predicted at the HTO cabin near Milne Port, and at the HTO cabin on the west bank of Camp Lake. Once the new rail road is operational and ore is transported by rail instead of truck, dust emissions along the Northern Transportation Corridor will be reduced from current levels associated with ERP operations. Overall, the residual effect of the Project on air quality are predicted to be: - Adverse in direction, though positive along the transportation corridor once rail is operational; - Of a magnitude that exceeds thresholds for certain worst-case modeled scenarios, but with additional mitigation exceedances are not anticipated at sensitive receptors; - Geographically confined to the LSA; - Infrequent; and - Reversible with the cessation of Project activities. There is a high probability of the residual effect occurring. In consideration of the information available and the results of ongoing monitoring activities related to air quality, there is a moderate level of confidence in the residual effects predictions for air quality.	Not significant	Not significant	No transboundary effects

VEC/VSEC	Key Indicator	Potential Effect(s)	Mitigation, Monitoring, Environmental Management, and Follow-up	Characterization of Residual Effect(s)	Significance Rating	Cumulative Effects	Transboundary Effects
Noise and Vibration	Noise and vibration levels	• Increase in noise levels • The potential effects of increased vibration levels were assessed for the Approved Project (Baffinland, 2012), and were determined to be not significant. Vibration from the Phase 2 Proposal is expected to be very similar to that of the Approved Project. Therefore, vibration was treated as a subject of note for the Phase 2 Proposal.	• Review, update, and implement the Environmental Protection Plan and the Air Quality and Noise Abatement Management Plan. • Implement key mitigation measures outlined under the AER Directive 038 (AEUB 2007), such as: ◦ Fitting internal combustion engines with appropriate muffler systems; ◦ Using acoustical screening from existing on-site buildings, where appropriate, to shield dwellings from construction equipment noise; ◦ Taking advantage of local topography to screen noise emissions, where possible; and ◦ Enclosing Milne Port crushing/screening plant in a building.	Overall, the residual effect of the Project on noise and vibration is predicted to be: • Adverse in direction; • Of a magnitude that exceeds thresholds for certain worst-case modelled scenarios outside of the Mine Site and Milne Port PDAs and at times at the HTO Cabin east of Milne Port; • Geographically confined to the LSA; • Of a duration that extends throughout the life of the Project • Infrequent; and • Reversible with the cessation of Project activities. There is a high probability of the residual effect occurring. In consideration of the information available and the results of ongoing monitoring activities related to noise, there is a high level of confidence in the residual effects predictions for noise and vibration.	Not significant	Not significant	No transboundary effects
Terrestrial Environment VECs							
Landforms, Soils, and Permafrost	• Landforms: ◦ Glaciofluvial deposits ◦ Eskers ◦ Drumlins ◦ Bedrock outcrops (cliffs) • Geochemistry • Paleontology	• Effects on unique or valuable landforms • Increase in geohazard risks • Increase in geochemical risks • Effects on paleontological resources	• Review, update and implement the following plans: ◦ Environmental Protection Plan; ◦ Borrow Pit and Quarry Management Plan; ◦ Railway Management Plan; ◦ Railway Emergency Plan; and ◦ Spill Contingency and Emergency Response Plan. • Thermal insulation may be used for the proposed Milne Port buildings, and adfreeze piles may be used for deep foundations.	The railway embankment will cross glaciofluvial deposits and a large esker. However, these landforms are not ecologically unique given the abundance of other similar glaciofluvial deposits (including eskers) in the RSA. The rail construction will also remove existing bedrock outcrop. However, bedrock outcrops that will be affected are not currently used by cliff-nesting raptors. The potential for ML/ARD occurring from quarrying and rock cuts is considered unlikely as most of the affected rock is sedimentary. Granitic rocks present in the area are predicted to be low potential for ML/ARD. Overall, the residual effects of the Project on landforms, soils, and permafrost are predicted to be: • Adverse in direction; • Low in magnitude; • Geographically confined to the LSA; • Permanent in duration; • Infrequent; and • Irreversible. The probability of the residual effect occurring is high for: • A residual change in the abundance and distribution of unique or valuable landforms; and • A residual ground disturbance of paleontological resources. The probability of the residual effect occurring is low for: • Residual effects related to geohazard risks (i.e., thaw settlement at Milne Port second ore dock, Milne Port infrastructure on land, and along the proposed North Railway); and • A residual increase in geochemical risks (i.e., exposure of potentially ML/ARD rock surfaces to the elements [along the North Railway]) have a low probability of occurring.	Not significant	Not significant	No transboundary effects

VEC/VSEC	Key Indicator	Potential Effect(s)	Mitigation, Monitoring, Environmental Management, and Follow-up	Characterization of Residual Effect(s)	Significance Rating	Cumulative Effects	Transboundary Effects
				In consideration of the information available and the results of ongoing monitoring related to landforms, soils, and permafrost, there is: • A moderate level of confidence in the residual effects predictions related to thaw settlement along the proposed North Railway and exposure of potentially ML/ARD rock surfaces to the elements; and • A high level of confidence in the residual effects predictions for all other residual effects on landforms, soils, and permafrost.			
Vegetation	• Vegetation abundance and diversity • Vegetation health • Culturally valued vegetation	• Change in vegetation abundance and diversity • Change in vegetation health • Any Project-related effects to culturally valued vegetation will be negligible since blueberry abundance within the RSA is very low and was previously assessed for the Approved Project as being not significant at the RSA scale with a high confidence. No effect assessment for culturally valued vegetation was completed for the Phase 2 Proposal.	• Review, update and implement the Environmental Protection Plan and the Terrestrial Environment Mitigation and Monitoring Plan. • Take measures to keep equipment brought to the site clean of soils that could contain plant seeds that do not currently occur within the RSA. • Allow natural regeneration of disturbed areas.	The Phase 2 Proposal has the potential to affect vegetation abundance and diversity in the PDA, as construction of the Northern Transportation Corridor and expansion at the Milne Inlet Port will remove approximately 14 km² of terrestrial habitat. Changes in vegetation health resulting from TSP deposition and atmospheric emissions outside the PDA were predicted to be negligible from natural variation. Vegetated habitat has the potential to be exposed to some level of dust deposition generated at Milne Inlet, Tote Road, the Mine Site, and along the North Railway. Although all vegetation classes considered sensitive to dust deposition and may be affected by annual TSP deposition, most of the habitats will remain intact within the RSA. Overall, the residual effects of the Project on vegetation are predicted to be: • Adverse in direction; • Of a magnitude that exceeds thresholds for certain dust deposition parameters within the PDA; • Geographically confined primarily to the PDA (as well as adjacent to the PDA for dust deposition); • Infrequent; • Of a duration that lasts for the life of the Project; and • Reversible with the cessation of Project activities and with reclamation. A residual change in vegetation abundance and diversity has a high probability of occurring. The probability of the residual effect occurring is low for a residual change in vegetation health due to TSP and a residual change in vegetation health due to atmospheric emissions. In consideration of the information available and the results of ongoing monitoring activities related to vegetation, there is: • A high level of confidence in the residual effects predictions related to a change in vegetation abundance and diversity; and • A moderate level of confidence in the residual effects predictions related to changes in vegetation health due to TSP and to atmospheric emissions.	Not significant	Not significant	No transboundary effects

VEC/VSEC	Key Indicator	Potential Effect(s)	Mitigation, Monitoring, Environmental Management, and Follow-up	Characterization of Residual Effect(s)	Significance Rating	Cumulative Effects	Transboundary Effects
Birds and Bird Habitat	• Red-throated loon • Snow goose • Common eider • King eider • Thick-billed murre • Lapland longspur • Harlequin duck • Peregrine falcon • Red knot • Buff-breasted sandpiper • Red-necked phalarope • Ivory gull • Ross’s gull • Short-eared owl	• Effects on habitat • Effects on risk of mortality • Effects on health	• Review, update, and implement the Environmental Protection Plan and the Terrestrial Environment Mitigation and Monitoring Plan. • Make raptor nest sites temporarily inaccessible to breeding birds during the nesting seasons potentially affected by construction.	Overall, the residual effect of the Project on birds and bird habitat are predicted to be: • Adverse in direction; • Low in magnitude; • Geographically confined to the PDA in general, but extending to the LSA for indirect effects on habitat quality or availability; • In a range from infrequent (for occurrences of bird injury and mortality), to frequent (for sensory disturbance), to continuous (for habitat loss); • Of a duration that last for the life of the Project; and • Reversible with the cessation of Project activities. The probability of the residual effects occurring is considered low for residual effects on bird health and moderate for all other residual effects on birds and bird habitat. In consideration of the information available and the results of ongoing monitoring activities related to birds and bird habitat, there is a high level of confidence in the residual effects predictions for birds and bird habitat.	Not significant	Not significant	Not significant
Terrestrial Wildlife and Wildlife Habitat	• Caribou • Wolf	• Effects on habitat • Effects on movement • Effects on risk of mortality • Effects on health	• Review, update and implement the following plans: ○ Environmental Protection Plan; ○ Terrestrial Environment Mitigation and Monitoring Plan; ○ Roads Management Plan; ○ Railway Management Plan; and ○ Railway Emergency Plan. • Implement the Caribou Protection Measures developed collaboratively with the QIA. • Continue engagement with stakeholders and the Terrestrial Environment Working Group.	Phase 2 Proposal components and activities at the Mine Site, the Tote Road and North Railway, and Milne Port have the potential to interact with terrestrial wildlife and habitat through collisions; increased harvesting; direct loss or alteration of terrestrial wildlife habitat; barriers to wildlife movement within or between habitats; and sensory disturbances. Overall, the residual effects of the Project on terrestrial wildlife and wildlife habitat are predicted to be: • Adverse in direction; • Generally low in magnitude given planned mitigation, but moderate in magnitude with respect to potentially reduced caribou habitat effectiveness during the winter season; • Generally geographically confined to the PDA, but extending outside of the PDA (within a 14 km ZOI) for potential residual effects on caribou habitat; • In a range from infrequent (for occurrences of wildlife injury and mortality), to frequent (for sensory disturbance), to continuous (for habitat loss and barriers to movement) for the life of the Project; • Of a duration that lasts for the life of the Project; and • Reversible with additional mitigation and the cessation of Project activities, except in the case of the residual change in risk of caribou mortality associated with improved harvester access and/or knowledge of the area, which may persist indefinitely. There is a high probability that the Project will result in residual changes in caribou movement and caribou mortality risk. The probability of the residual effects occurring is moderate for residual changes in caribou and	Not significant	Not significant	No transboundary effects

VEC/VSEC	Key Indicator	Potential Effect(s)	Mitigation, Monitoring, Environmental Management, and Follow-up	Characterization of Residual Effect(s)	Significance Rating	Cumulative Effects	Transboundary Effects
				wolf habitat and is low for residual changes in caribou health. In consideration of the information available and the results of ongoing monitoring related to terrestrial wildlife and wildlife habitat, there is: • A moderate level of confidence in the residual effects predictions related to caribou habitat, caribou movement, caribou health, and wolf habitat; and • A high level of confidence in the residual effects predictions related to caribou mortality risk.			
Freshwater Aquatic Environment VECs							
Freshwater Quantity and Quality	Freshwater quantity and quality	• Effects on water quantity • Effects on water quality	• Review, update and implement the following plans: ○ Environmental Protection Plan; ○ Surface Water, Aquatic Ecosystems, and Fish and Fish Habitat Management Plan; ○ Fresh Water Supply, Sewage, and Wastewater Management Plan; and ○ Plans required under the Type A Water Licence, which will be submitted to the NWB for review and approval, including: ▪ Aquatic Effects Monitoring Plan; ▪ Surface Water Sampling Program – Quality Assurance and Quality Control Plan; ▪ Blasting Management Plan; and ▪ Quarry Management Plans.	As a result of the Phase 2 Proposal, freshwater quantity and quality may change due to changes in sedimentation rates, hydrology, metal concentrations; and water flows via withdrawals and diversions. Overall, the residual effect of the Project on freshwater quantity and quality is predicted to be: • Adverse in direction, with the exception of a positive direction on water quality at the Mine Site due to changes associated with secondary ore processing; • Low in magnitude given planned mitigation and the small footprint affected relative to the watershed scale in the region; • Geographically confined to the LSA; • Infrequent effects are associated with the water withdrawals and continuous effects are associated with the stream diversions and water/sediment quantity and quality alterations; • Of a duration that will occur throughout the life of the Project; and • Reversible with additional mitigation and the cessation of Project activities. There is a high probability of the residual effects occurring. In consideration of the information available and the results of ongoing monitoring related to freshwater quantity and quality, there is a high level of confidence in the residual effects predictions for freshwater quantity and quality.	Not significant	Not significant	No transboundary effects

VEC/VSEC	Key Indicator	Potential Effect(s)	Mitigation, Monitoring, Environmental Management, and Follow-up	Characterization of Residual Effect(s)	Significance Rating	Cumulative Effects	Transboundary Effects
Freshwater Biota and Habitat	Arctic char	- Effects on health and condition of Arctic char - Effects on habitat of Arctic char - Effects on risk of mortality of Arctic char	- Adhere to applicable DFO authorization and offsetting requirements (DFO, 2013b, 2016). - Obtain Project-specific <i>Fisheries Act</i> Authorization(s) from DFO, where required for water crossings and other in-water works, and comply with associated terms and conditions. - Develop an Offsetting Plan which will be submitted to DFO for review and approval as part of the application for <i>Fisheries Act</i> Authorization, to offset the serious harm to fish associated with construction of the North Rail and construction of the second ore dock at Milne Port.	As a result of the Phase 2 Proposal, Arctic char habitat loss/alteration due to construction of North Railway is expected. In-water infrastructures (i.e., bridge footings, culverts, diversion activities) may negatively affect fish passage. Water withdrawals for dust suppression may reduce shoreline habitat, and cause stranding or impingement on the water intakes. The water and sediment quality and quantity at the Mine Site and along the Northern Transportation Corridor may be negatively affected by sediment inputs from ore production, transport, and related activities. Overall, the residual effects of the Project on freshwater biota and habitat are predicted to be: - Adverse in direction; - Low in magnitude given planned mitigation and the small footprint effected relative to available habitat in the region; - Geographically confined to the LSA; - Infrequent effects are associated with the water withdrawals and continuous effects are associated with the habitat and water/sediment quantity and quality alterations; - Of a duration that will occur throughout the life of the Project; and - Reversible with mitigation and the cessation of Project activities. There is a high probability of the residual effects occurring. In consideration of the information available and the results of ongoing monitoring related to freshwater biota and habitat, there is a high level of confidence in the residual effects predictions.	Not significant	Not significant	No transboundary effects
Marine Environment VECs							
Marine Ice, Water, and Sediment Quality	- Marine ice - Marine water quality - Marine sediment quality	- Effects on marine ice - Effects on marine water quality - Effects on marine sediment quality	- Review and update the following plans: - Environmental Protection Plan; - Marine Environmental Effects Monitoring Plan; - Shipping and Marine Wildlife Management Plan; - Surface Water, Aquatic Ecosystems, and Fish and Fish Habitat Management Plan; - Fresh Water Supply, Sewage, and Wastewater Management Plan; - Emergency Response Plan; - Spill Contingency Plan; - Oil Pollution Emergency Plan; - Spill at Sea Response Plan; and - Plans required under the Type A Water Licence, which will be submitted to the NWB for review and approval, including: - Aquatic Effects Monitoring Plan; and	Phase 2 Proposal components and activities at Milne Port and the Northern shipping route have the potential to interact with marine ice, water, and sediment quality through the construction and removal of the ore dock and other marine facilities; vessel traffic; ballast water discharge; wastewater and site water discharge and; ore dust from the stockpiles and ship loading. Overall, the residual effects of the Project on marine ice, water, and sediment quality are predicted to be: - Adverse in direction; - Low in magnitude that is low given planned mitigation; - Geographically confined to the LSA but extending to the RSA for a residual increase in TSS and metals in water as well as a residual increase in metals and change in physical composition in sediments due to dispersion and deposition of dust; - Frequent; - Of a duration that lasts for the life of the Project; and	Not significant	Not significant	No transboundary effects

VEC/VSEC	Key Indicator	Potential Effect(s)	Mitigation, Monitoring, Environmental Management, and Follow-up	Characterization of Residual Effect(s)	Significance Rating	Cumulative Effects	Transboundary Effects
			▪ Surface Water Sampling Program – Quality Assurance and Quality Control Plan. • Manage runoff, sewage, and wastewater discharges to comply with the effluent quality discharge limits specified in Type A Water Licence.	• Reversible with additional mitigation and the cessation of Project activities. There is a high probability of the residual effects occurring. In consideration of the information available and the results of ongoing monitoring related to marine ice, water, and sediment quality, there is a high level of confidence in the residual effects predictions.			
Marine Habitat and Biota	• Marine fish habitat • Arctic char	• Effects on marine fish habitat • Effects on Arctic char health and condition	• Implement the commitments listed above for the Marine Ice, Water, and Sediment Quality VEC. • Adhere to applicable DFO authorization and offsetting requirements (DFO, 2013b, 2016). • Obtain Project-specific <i>Fisheries Act</i> Authorization(s) from DFO, where required for in-water works, and comply with associated terms and conditions. • Develop an Offsetting Plan, which will be submitted to DFO for review and approval as part of the application for <i>Fisheries Act</i> Authorization, to offset the serious harm to fish associated with construction of the second ore dock at Milne Port. TSD 23 outlines a conceptual Marine Offsetting Plan. • Continue to implement existing plan for Aquatic Invasive Species Monitoring of Milne Inlet Marine Ecosystem.	• Phase 2 Proposal components and activities at Milne Port and Marine Shipping along the Northern shipping route have the potential to interact with marine biota and habitat through habitat loss/alteration, acoustic disturbances, and invasive species introduction. • Overall, the residual effect of the Project on marine habitat and biota is predicted to be: • Adverse in direction; • Low in magnitude given planned mitigation; • Of a duration that ranges from during construction (e.g., sediment resuspension) to extending beyond the life of the Project (e.g., introduction of aquatic invasive species); • Geographically confined to the LSA, apart from aquatic invasive species introduction; • Continuous, apart from sediment resuspension concerns during construction; and • Reversible with additional mitigation and the cessation of Project activities, apart from aquatic invasive species introduction. There is a high probability of the residual effects occurring. In consideration of the information available and the results of ongoing monitoring related to marine habitat and biota, there is a high level of confidence in the residual effects predictions.	Not significant	Not significant	Not significant
Marine Mammals	• Ringed seal • Walrus • Beluga whale • Narwhal • Bowhead whale • Polar bear	• Change in habitat • Acoustic disturbance effects • Hearing impairment effects • Auditory masking effects • Effects on risk of mortality	• Implement the commitments listed above for the Marine Ice, Water, and Sediment Quality VEC. • Review and update the following additional plans: ◦ Shipping and Marine Wildlife Management Plan; ◦ Polar Bear Safety Plan; and ◦ Biophysical Environmental Effects Monitoring Framework, Appendix 4 (Candidate Environmental Effects Monitoring Studies Marine Mammal). • Implement a ramp-up procedure for pile driving activities during construction and install a bubble curtain around the wetted pile to dampen sound transmission through water during active pile driving. • Engage a qualified and experienced Marine Mammal Observer (MMO) to undertake marine mammal monitoring, and	Phase 2 Proposal components and activities at Milne Port and the Northern shipping route have the potential to interact with marine mammal populations through ship strikes, acoustic disturbances, contaminant loading, and habitat loss. Overall, the residual effects of the Project on marine mammals are predicted to be: • Adverse in direction; • Low in magnitude given planned mitigation; • Geographically confined to the LSA; • Infrequent; • Of a duration that extends throughout the life of the Project; and • Reversible with additional mitigation and the cessation of Project activities. In consideration of the information available and the results of ongoing monitoring related to marine mammals, there is:	Not significant	Not significant	Not significant

VEC/VSEC	Key Indicator	Potential Effect(s)	Mitigation, Monitoring, Environmental Management, and Follow-up	Characterization of Residual Effect(s)	Significance Rating	Cumulative Effects	Transboundary Effects
			communicate all marine mammal sightings to the piling contractor, during all pile driving activities. • Reduce vessel speeds when transiting along the established shipping corridor and operating in Milne Port.	• A moderate to high level of confidence in the residual effects predictions related to a change in habitat; and • A moderate level of confidence in the residual effects predictions for all other residual effects on marine mammals. There is a high probability of the residual effects occurring. In consideration of the information available and the results of ongoing monitoring related to marine mammals, there is a high level of confidence in the residual effects predictions.			
Human Environment VSECs							
Population Demographics	• Demographic stability	• Change in in-migration of non-Inuit Project employees into the North Baffin LSA • Change in out-migration of Inuit residents from the North Baffin LSA	• Direct hire from within and outside the LSA.	While Inuit employment levels have the potential to increase over time, the overall magnitude of Inuit out-migration is not expected to change. Assessment outcomes for population demographics therefore remain the same as for the Approved Project. Potential residual effects arising from in-migration and out-migration are not expected to be sufficient to cause adverse effects on demographic stability of the affected communities. Overall, the residual effects of the Project on population demographics are predicted to be: • Adverse in direction; • Low to moderate in magnitude; • Occurring within point-of-hire communities; • Intermittent in frequency; • Long-term in duration; and • Reversible. There is a high probability of the residual effects occurring. In consideration of the information available and the results of ongoing monitoring related to community population demographics, there is: • A moderate level of confidence in the residual effects predictions related to the out-migration of Inuit residents from the North Baffin LSA; and • A high level of confidence in the residual effects predictions related to the in-migration of non-Inuit Project employees into the North Baffin LSA.	Not significant	Not significant	• No transboundary effects
Education and Training	• Life skills • Education and skills	• Improvement of life skills among LSA residents • Change in incentives related to school attendance and success • Change in opportunities to gain skills	• Review, update and implement Human Resources Plan. • Implement IIBA initiatives, and the Q-STEP training program	In general, the Phase 2 Proposal is expected to result in positive effects on education and training. These positive effects are anticipated to arise from access to industrial work supported by pre-employment preparation and on-the-job training. Overall, the residual effects of the Project on education and training are predicted to be: • Positive to mostly positive in direction; • Moderate to high in magnitude; • Occurring within point-of-hire communities; • Continuous in frequency;	Significant (positive)	Positive cumulative effects	• Positive transboundary effects

VEC/VSEC	Key Indicator	Potential Effect(s)	Mitigation, Monitoring, Environmental Management, and Follow-up	Characterization of Residual Effect(s)	Significance Rating	Cumulative Effects	Transboundary Effects
				• Of a duration that extends throughout the life of the Project to long-term in duration; and • Non-reversible or spontaneous. The probability of the residual effects occurring is high. In consideration of the information available and the results of ongoing monitoring related to education and training, there is: • A moderate level of confidence in the residual effects predictions related to improved life skills among LSA residents; and • A high level of confidence in the residual effects predictions related to incentives for school attendance and success and opportunities to gain skills.			
Livelihood and Employment	• Wage employment • Job progression and career advancement	• Creation of jobs in the LSA • Change in employment of LSA residents • New career paths	• Review, update and implement Human Resources Plan. • Implement IIBA initiatives, and the Q-STEP training program. • Designate all LSA communities as points-of-hire.	In general, the Phase 2 Proposal is expected to result in positive effects on livelihood and employment. These positive effects are anticipated to arise from new employment opportunities, local hiring commitments, and career progression opportunities provided by the Project. Overall, the residual effects of the Project on livelihood and employment are predicted to be: • Positive in direction; • Moderate to high in magnitude; • Occurring within point-of-hire communities; • Continuous in frequency; • Medium-term to long-term in duration; and • Spontaneous. The probability of the residual effects occurring is high. In consideration of the information available and the results of ongoing monitoring related to livelihood and employment, there is: • A moderate level of confidence in the residual effects predictions related to employment of LSA residents and new career paths; and • A high level of confidence in the residual effects predictions related to creation of jobs in the LSA.	Significant (positive)	Positive cumulative effects	Positive transboundary effects
Economic Development and Self-reliance	• Land • People • Community economies • Territorial economy	Specific residual effects were not identified or assessed for this VSEC. Rather, overall assessments of the key indicators ‘land’, ‘people’, ‘community economy’, and ‘territorial economy’ were conducted and conclusions were drawn based on this integrated analysis.	• Review, update and implement Human Resources Plan. • Implement IIBA initiatives, and the Q-STEP training program. • Designate all LSA communities as points-of-hire.	No new residual effects will result from the Phase 2 Proposal, as no new impact pathways for economic development and self-reliance will be created. The Phase 2 Proposal will not introduce any new activities that change the previously assessed effects to economic development and self-reliance, although positive effects in some areas may be enhanced. Similar to previous assessments of the Approved Project, direct and indirect economic expansion associated with the Project will create new opportunities for employment and business across the RSA, and particularly within the LSA. The Project will also enhance labour force capacity and increase Inuit business capacity. Residual effects were not characterized for this VSEC because the assessment was integrative in nature, relying primarily on the conclusions of other VEC and VSEC	Significant (positive)	Positive cumulative effects	Positive transboundary effects

VEC/VSEC	Key Indicator	Potential Effect(s)	Mitigation, Monitoring, Environmental Management, and Follow-up	Characterization of Residual Effect(s)	Significance Rating	Cumulative Effects	Transboundary Effects
				residual effect assessments to understand the Phase 2 Proposal’s interactions on economic development and self-reliance. The overall direction of the Phase 2 Proposal’s effects on the economic development and self-reliance VSEC has been assessed, with a high level of confidence, to be positive.			
Human Health and Well-being	- Well-being of children - Substance abuse - Community social stability	- Changes in parenting - Change in household income and food security - Change in transport of substances through Project sites - Change in affordability of substances - Change in attitudes toward substances and addictions - Effects of absence from the community during work rotation	- Continue to implement a no drugs/no alcohol policy on site with baggage searches for all employees and contractors arriving at site, access to an EFAP for workers and their family members, and contributions to the INPK community wellness fund. - Implement IIBA initiatives.	The nature of the activities associated with the Phase 2 Proposal are such that positive effects associated with the Approved Project will continue to be realized, and possibly enhanced. The Phase 2 Proposal is predicted to have a positive effect on parents gaining employment at the Project and an overall benefit by most children from the improved well-being their parents gain from having a good job, reduced financial stresses in the family, and improved food security. For a minority of children, challenges related to parental absence, the transition between parental comings and goings, changing parental expectations, and the response of parents to the stresses and concerns brought about by fly-in/fly-out employment are expected to lead to some adverse residual effects. The adverse residual effects of the Project on human health and well-being are predicted to be: - Low to moderate in magnitude; - Occurring within point-of-hire communities; - Intermittent to continuous in frequency; - Medium-term to long-term in duration; and - Spontaneous. The probability of the adverse residual effects occurring is high for: - Residual changes in parenting; and - Residual effects of absence from the community during work rotations The probability of the adverse residual effect occurring is moderate for a residual change in the transport of substances through Project sites. In consideration of the information available and the results of ongoing monitoring related to human health and well-being, there is: - A moderate level of confidence in the adverse residual effects predictions related to changes in parenting; and - A high level of confidence in the adverse residual effects predictions related to the transport of substances through Project sites and absence from the community during work rotations.	Not significant	Not significant	Not significant
Community Infrastructure and Public Services	Hamlet staff recruitment and retention in the North Baffin LSA	- Effects on competition for skilled workers - Change in labour force capacity	Monitor employee-specific information (e.g., through surveys, and employment and training records), Project-related community infrastructure use, and government statistics (e.g., on health centre usage).	The nature of the activities associated with the Phase 2 Proposal are such that positive effects associated with the Approved Project will continue to be realized, and possibly enhanced. The Phase 2 Proposal is predicted to have a positive effect on labour force capacity. However, an adverse residual effect on competition for skilled workers	Not significant (adverse); significant (positive)	Not significant	No transboundary effects

VEC/VSEC	Key Indicator	Potential Effect(s)	Mitigation, Monitoring, Environmental Management, and Follow-up	Characterization of Residual Effect(s)	Significance Rating	Cumulative Effects	Transboundary Effects
				is also predicted from the creation of competition with local employers. This adverse residual effect of the Project on community infrastructure and public services is predicted to be: • Moderate in magnitude; • Occurring within point-of-hire communities; • Intermittent in frequency; • Short-term in duration; and • Reversible. The probability of the residual effects occurring is high. In consideration of the information available and the results of ongoing monitoring related to community infrastructure and public services, there is a high level of confidence in the residual effects predictions.			
Contracting and Business Opportunities	• Business opportunities	• Expansion of market for business services to the Project • Expansion of market for consumer goods and services	• Monitor the value of procurement with Inuit-owned businesses and joint ventures, LSA employee payroll amounts, and the number of registered Inuit firms in the LSA.	The nature of the activities associated with the Phase 2 Proposal are such that positive effects associated with the Approved Project will continue to be realized, and possibly enhanced as Baffinland looks to expand its operations (e.g., through additional capital expenditure and contracting opportunities associated with the Phase 2 Proposal) and boost its local contracting efforts. Overall, the residual effects of the Project on contracting and business opportunities are predicted to be: • Positive in direction; • Moderate to high in magnitude; • Occurring within the LSA, RSA, and point-of-hire communities; • Continuous in frequency; • Medium-term in duration; and • Spontaneous. The probability of the residual effects occurring is high. In consideration of the information available and the results of ongoing monitoring related to contracting and business opportunities, there is a high level of confidence in the residual effects predictions.	Significant (positive)	Positive cumulative effects	Positive transboundary effects
Culture, Resources, and Land Use	• Cultural resources • Harvesting • Travel and camps	• Effects related to ground disturbance • Effects on caribou harvesting • Effects on marine mammal harvesting • Effects on safe travel within Pond Inlet, Eclipse Sound, Milne Inlet during open water • Sensory disturbance at camps • Effects on safe travel inland through Milne Port • Sensory disturbance and effects on safety along the Milne Inlet Tote Road • Effects on difficulty and safety relating to railway crossing	• Review, update, and implement Cultural Heritage Resource Protection Plan.	In general, the nature and magnitude of the effects to culture, resources and land use are consistent with the conclusions presented in the Approved Project. The Phase 2 Proposal will result in adverse effects associated with the culture, resource and land use VSEC related to the loss of cultural resources, change in access to or availability of harvesting resources, and change in access to travel corridors and camps. Overall, the residual effects of the Project on culture, resources, and land use are predicted to be: • Adverse in direction; • Low to moderate in magnitude; • Occurring generally within PDA and extending to areas that may experience additional noise and dust; • Infrequent, though in some cases continuous for effects related to access, throughout the life of the Project; and	Not significant	Not significant	No transboundary effects

VEC/VSEC	Key Indicator	Potential Effect(s)	Mitigation, Monitoring, Environmental Management, and Follow-up	Characterization of Residual Effect(s)	Significance Rating	Cumulative Effects	Transboundary Effects
				- Reversible in nature with the exception of potential ground disturbance effects on cultural resources. There is generally a high probability of the residual effects occurring, except for: - residual effects on marine mammal harvesting, which have a moderate probability of occurring; and - residual effects on caribou harvesting, which have a low probability of occurring. In consideration of the information available and the results of ongoing monitoring related to culture, resources, and land use, there is: - A high level of confidence in the residual effects predictions related to increased ground disturbance, sensory disturbance at camps, and difficulty and safety relating to railway crossing; and - A moderate level of confidence in the residual effects predictions for all other residual effects on culture, resources, and land use.			
Benefits, Royalty, and Taxation	• Benefits, royalties, and taxation	• Change in benefits, royalties, and taxation	• Implemen IIBA initiatives.	The Approved Project provides significant positive effects with respect to the benefits generated in Nunavut. The Phase 2 Proposal will provide an incremental increase to these already significant effects.	Significant (positive)	Positive cumulative effects	Positive transboundary effects
Governance and Leadership	• Governance and leadership	• Not applicable (assessed as subject of note)	• Implement IIBA initiatives.	In the FEIS, Governance and Leadership was addressed as a subject of note. The Phase 2 Proposal does not change the effects of the Project on Governance and Leadership. Since the FEIS, Baffinland and the QIA have negotiated an IIBA, a number of initiatives have been launched, and socio-economic monitoring has been ongoing. In line with the FEIS, the Project is considered to have a positive and significant effect on Governance and Leadership.	Significant (positive)	Positive cumulative effects	No transboundary effects
Assessment of Effects of the Environment on the Project and Accidents, Malfunctions, and Unplanned Events							
Effects of the Environment on the Project	- Geo-hazards - Extreme Weather Events - Global Climate Change	- Ground Stability - Slope Stability - Seismic Events - Extreme Temperatures - Extreme Precipitation and Flooding - High Winds and Waves - Storm Surges - Severe Fog or White-Outs - Increasing Temperatures - Reduced Sea Ice - Sea Level Changes - Increasing Precipitation - Increasing Active Layer Thickness	• Appropriate engineering design	Potential concerns are mitigated through the adoption of appropriate engineering design.	Not significant	Not applicable	Not applicable
Accidents, Malfunctions, and Unplanned Events	Accidents and malfunctions were assessed as part of the Approved Project, and a risk register was developed to identify the potential risks, the likelihood of the accidental event occurring, level of consequence associated with each accidental event, and applicable emergency response plans. The Phase 2 Proposal has not altered the risk register for the Project, apart from one accident scenario related to shipping					Not applicable	Not applicable

VEC/VSEC	Key Indicator	Potential Effect(s)	Mitigation, Monitoring, Environmental Management, and Follow-up	Characterization of Residual Effect(s)	Significance Rating	Cumulative Effects	Transboundary Effects
	during periods of ice break-up and ice formation. Overall, consequence and likelihood ratings have not changed from the Approved Project and the environmental effects of a spill in ice conditions would be no greater than, and often less than, those described in the Approved Project, and therefore the conclusions presented in the Approved Project remain unchanged for Phase 2 Proposal.						

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 356 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

G.4 Ongoing Assessment of Predicted Residual Impacts

The Phase 2 Proposal presents up to date predictions for residual effects of the Project. Collection of information and data occurs on an annual basis under Baffinland's environmental monitoring programs and is used to assess current site conditions for comparison to initial predictions and assumptions from the Mary River EIS and Addendums. Results are reported annually to the NIRB and other relevant stakeholders (Section 2.5.2).

Revisions to existing predictions of residual impact assessments will be completed where significant variances are identified. Identification of significant variances includes the QA/QC; comparisons to the respective benchmark and to reference and/or baseline; and review of the data using various tools such as Exploratory Data Analysis (EDA) and Statistical Data Analysis (SDA), to determine if change is occurring. A change may be detected statistically or qualitatively, relative to benchmarks, baseline values and/or spatial or temporal trends. A change may be statistically significant, but professional judgement will also be applied using the various evaluation tools to detect a change qualitatively. If this analysis does not detect change, then no action is required. If a change is observed, then further evaluation of the data for that/those indicator(s) will be carried out to determine whether the observed change is Project-related. If the evaluation has indicated with some certainty that the measured change is Project-related, a determination of the action level associated with the observed monitoring results through comparisons to indicators or benchmarks will be conducted. As appropriate to the VEC in question, a determination of the action level associated with the observed monitoring results, and the appropriate response will align with any relevant management and monitoring programs.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 357 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Appendix H

FEIS Freshwater Quality Predictions

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 358 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Effects to freshwater and sediment quality have been identified as an area of interest by QIA during its review of Baffinland's ICRP since 2015. This Appendix presents a summary of findings specifically for this VEC. Effects on the surface water and sediment quality VEC were assessed in accordance with the methodology outlined in FEIS Volume 2, Section 3.0. VEC-specific modifications were made to the general methodology, which are highlighted below. As part of the effects assessment completed for the Phase 2 Proposal, a review of existing effluent quality predictions was completed. The conclusion of this review was that the previous modelling was substantially representative of the effluent quality monitoring conducted at site to date (TSD 13, Phase 2 Proposal). It is worth noting that modelling efforts to assess seepage and runoff quality at the Waste Rock Facility are ongoing as part of an updated 1-5 Year Waste Rock Management Plan which will be submitted in December 2019.

Water and Sediment Quality

Assessment Methods and Criteria

The following basic EA steps were undertaken during the assessment:

- Regional and local study areas were determined.
- VECs, Key Indicators and Thresholds were identified.
- Project activities that could affect surface water and sediment quality were identified.
- Project interactions with, and effects on, the surface water and sediment quality VEC were identified.
- Linkage evaluations were performed outlining potential effects related to various phases of the Project (Construction, Operation, and Closure) and Project LSAs (Milne Port, Milne Inlet Tote Road, Mine Site, Railway Alignment, and Steensby Port).
- Mitigation measures were identified to avoid or reduce the potential effects during the various phases of the Project.
- Residual effects and their relative significance were identified for the surface water and sediment quality VECs.
- Long-term monitoring programs were identified to distinguish Project-related impacts from natural variability, in order to verify impact assessment predictions and to meet compliance/conformance criteria.

Key Indicators and Thresholds

For the assessment of potential effects on the surface water and sediment quality VEC a list of key indicators that were considered to be the most relevant and important elements of the VEC was assembled. The key indicators fall into four categories:

1) General Parameters

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 359 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

- 2) Metals
- 3) Nutrients
- 4) Petroleum Hydrocarbons

Thresholds were identified representing a level of change where adverse effects may be expected to occur. In the case of water and sediment quality, it is important to note that the thresholds do not relate to water or sediment quality in itself, but rather to known effects on aquatic receptors that rely on water and sediment to exist.

The thresholds used in this assessment were derived from the following sources, which are relevant in the context of this environmental effects assessment:

- Schedule 4 of the Metal and Diamond Mining Effluent Regulation under the Federal *Fisheries Act*.
- CCME Canadian Water Quality Guidelines for the Protection of Aquatic Life (PAL) (2003).
- Interim Sediment Quality Guidelines (ISQG) and Probable Effects Level (PEL) identified in the CCME Canadian Sediment Quality Guidelines for the Protection of Aquatic Life (2003).

The CCME PAL thresholds are typically the most stringent; hence these values were generally selected for application.

Local waters around the Project sites have not historically been used for drinking, although the Project uses and will use local waters for potable water supply, and it is conceivable that Inuit travelling over the land could also drink any of the local water. Therefore, Health Canada's Canadian Drinking Water Guidelines (2004) have been used for comparison purposes.

To fill gaps for those key indicators that have no thresholds identified in the sources listed above, two secondary sources were adopted:

- BC Ministry of Environment (MOE) Approved and Working Water Quality Guidelines and Alert Levels.
- Criteria Continuous Concentration (Chronic) National Recommended Water Quality Criteria, USEPA (2006).

The relationships between potential surface water and sediment quality effects, key indicators and thresholds are summarized in Table H.1.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 360 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table H.1: Key Indicators and Thresholds for Water and Sediment Quality

Potential Effect	Key Indicator	Thresholds (Magnitude and Extent)			
		MMER ¹	CWQG (PAL) ²	CDWQG ³	NWB ⁴
Water Quality from Mine Contact Water and Site Runoff	TSS (mg/L)	15	+5		35
	pH (pH unit)	6.0 - 9.5	6.5 - 9.0	6.5 - 8.5 ¹¹	6.0 - 9.5
	Hardness CaCO ₃ (mg/L)				
	Alkalinity CaCO ₃ (mg/L)				
	Chloride (mg/L)		640 (Short-term) 120 (Long-term)	250 ¹²	
	Sulphate SO ₄ (mg/L)			500 ¹²	
	Ammonia N (total) (mg/L)		Varies ⁵		
	Ammonia N (un-ionized) (mg/L)		0.019		
	Nitrate N (mg/L)		13	10	
	Nitrite N (mg/L)		0.06	3.2	
	Total P (mg/L)		see Table 7-3.4 (FEIS Volume 7)		
	Total Aluminum (mg/L)		0.005 - 0.1 ⁶ (0.94) ⁷	0.1	
	Total Antimony (mg/L)			0.006	
	Total Arsenic (mg/L)	0.5	0.005	0.01	
	Total Barium (mg/L)			1	
	Total Beryllium (mg/L)		0.0053 ⁸		
	Total Boron (mg/L)		29 (Short-term) 1.50 (Long-term)		
	Total Cadmium (mg/L)		0.000029 ⁸	0.005	
	Total Chromium (mg/L)		0.0047 ⁷	0.05	
	Trivalent Chromium (mg/L)		0.001		
	Hexavalent Chromium (mg/L)		0.0089		
	Total Cobalt (mg/L)				
	Total Copper (mg/L)	0.3	0.00467 ⁷	1.0 ¹²	
	Total Cyanide (mg/L)	1.0	0.005 (as free CN)	0.2	
	Total Iron (mg/L)		1.2 ⁷	0.3 ¹²	
	Total Lead (mg/L)	0.2	0.001 ⁹	0.01	
	Total Manganese (mg/L)			0.05 ¹²	
	Total Mercury (mg/L)		0.000026	0.001	
	Total Molybdenum (mg/L)		0.073		
	Total Nickel (mg/L)	0.5	0.083 ¹⁰		
	Total Selenium (mg/L)		0.001	0.01	
	Total Silver (mg/L)		0.0001		
	Total Thallium (mg/L)		0.0008		
	Total Uranium (mg/L)		0.015	0.02	
	Total Vanadium (mg/L)		0.006 ¹¹		
	Total Zinc (mg/L)	0.5	0.03	5.0	
	1-2 Propylene Glycol		500 (interim)		
	Benzene (µg/L)		370		

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 361 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Potential Effect	Key Indicator	Thresholds (Magnitude and Extent)			
		MMER ¹	CWQG (PAL) ²	CDWQG ³	NWB ⁴
Water Quality from Fuel Contact	Toluene (µg/L)		2		
	Ethyl benzene (µg/L)		90		
	Lead (µg/L)		1		
	Oil and Grease (µg/L)		15,000		
Water Quality from Discharge of Sewage	BOD ₅ (mg/L)				30
	Fecal Coliform (CFU/100mL)				1,000
Potential Effect	Key Indicator	Thresholds (Magnitude and Extent)			
		ISQG ¹⁴	PEL ¹⁴		
Sediment Quality	Arsenic (mg/kg)	5.9	17		
	Cadmium (mg/kg)	0.6	3.5		
	Chromium (mg/kg)	37.3	90		
	Copper (mg/kg)	35.7	197		
	Lead (mg/kg)	35.0	91.3		
	Mercury (mg/kg)	1.7	4.86		
	Zinc (mg/kg)	123	315		

NOTE(S):

1. MEAN MONTHLY MAXIMUM AVERAGES IN SCHEDULE 4 OF THE METAL AND DIAMOND MINING EFFLUENT REGULATION UNDER THE FEDERAL *FISHERIES ACT*.
2. CANADIAN COUNCIL OF MINISTERS OF THE ENVIRONMENT (CCME) CANADIAN WATER QUALITY GUIDELINES FOR THE PROTECTION OF AQUATIC LIFE (PAL) (2011).
3. HEALTH CANADA GUIDELINES FOR CANADIAN DRINKING WATER QUALITY SUMMARY TABLE (2010).
4. NUNAVUT WATER BOARD WASTEWATER CRITERIA.
5. VARIES WITH TEMPERATURE AND PH.
6. VARIES WITH PH; AT PH <6.5 CRITERION IS 0.005 MG/L; AT PH >6.5 CRITERION IS 0.1 MG/L.
7. SITE SPECIFIC CRITERION DEVELOPED FOR THE MARY RIVER MINE SITE AREA (KNIGHT PIÉSOLD, 2011)
8. VARIES WITH HARDNESS $[Cd] = 10^{0.86[\log_{10}(\text{hardness})] - 3.2} \mu\text{g/L}$. BASED ON MEAN HARDNESS IN MARY RIVER OF 84 MG/L, THE CADMIUM CRITERION WOULD BE 0.000029 MG/L.
9. VARIES WITH HARDNESS. $[Pb] = e^{1.273[\ln(\text{hardness})] - 4.705} \mu\text{g/L}$. BASED ON MEAN HARDNESS IN MARY RIVER OF 84 MG/L, THE LEAD CRITERION WOULD BE 0.00255 MG/L.
10. VARIES WITH HARDNESS. $[Ni] = e^{1.273[\ln(\text{hardness})] - 4.705} \mu\text{g/L}$. BASED ON MEAN HARDNESS IN MARY RIVER OF 84 MG/L, THE NICKEL CRITERION WOULD BE 0.083 MG/L.
11. BC MOE APPROVED AND WORKING WATER QUALITY GUIDELINES.
12. AESTHETIC OBJECTIVE.
13. PROPOSED GUIDELINE.
14. INTERIM SEDIMENT QUALITY GUIDELINES (ISQG) AND PROBABLE EFFECTS LEVEL (PEL) IDENTIFIED IN THE CCME CANADIAN SEDIMENT QUALITY GUIDELINES FOR THE PROTECTION OF AQUATIC LIFE (2003).

The thresholds identified in Table H.1 were applied in the effects assessment in the following manner:

- MDMER Schedule 4 thresholds were applied as ‘end of pipe’ criteria for mine contact water discharge.
- CCME PAL (or site-specific water quality objectives) were applied as receiving environment criteria for all sources.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 362 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

- NWB were applied as 'end of pipe' criteria for wastewater (sewage effluent) discharge.

A number of key parameters are naturally elevated in surface waters around the Mine Site, and as such, site specific water quality objectives (SSWQOs) were developed for the following parameters using CCME (1993) background concentration procedure (Knight Piésold, 2011):

- Aluminum
- Chromium
- Copper
- Iron

The developed SSWQOs are summarized in Table H.1 above. It was not appropriate to develop site specific criteria for Uranium or Selenium as explained in FEIS Appendix 7B-2.

Key Issues and Pathways

Key issues which were assessed for the surface water and sediment quality VEC included:

- Pit water quality from the Mine Site LSA
- Surface runoff from Project roads in the five freshwater LSAs
- Discharges from Project WWTFs from the five freshwater LSAs
- Acid Rock Drainage (ARD) and Metal Leaching (ML) resulting from waste rock piles, ore stockpiles, open pit dewatering, construction fills, embankment of roads and railway, and open quarries in the five freshwater LSAs
- Nutrient input from blasting activities and chemical leaching from rail sleeper coatings in the five freshwater LSAs
- Suspended sediment due to construction of mine facilities, Milne Inlet Tote Road, the railway and associated water crossings
- Runoff at fuel storage facilities, including fuel spills and malfunctions from the five freshwater LSAs
- Effects from waste management activities including storage, handling and landfilling of waste, landfarming of contaminated ice/snow/soil, the management of historically contaminated material, and sewage effluent discharges in the five freshwater LSAs
- Effects from construction and operation of camps in the five freshwater LSAs
- Effects from erosion and sediment transport due to vegetation removal, cuts/fills and other disturbances in the five freshwater LSAs
- Effects from dust deposition in the five freshwater LSAs

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 363 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

- Effects from drilling water withdrawals and returns in the Mine Site LSA

An account of key issues, indicators, and Project locations and phases that were incorporated in the effects assessment is provided in Table H.2.

Table H.2: Key Issues for Water and Sediment Quality

Key Issue	Indicators	Project Location (LSA)	Project Phase
Ground Preparation, Earthworks, Road and Railway construction	pH, TSS, Metals and Nutrients	All	Construction and Closure
Site Water Management	pH, TSS, Metals, Nutrients and Petroleum Hydrocarbons	Milne Inlet LSA Northern Transportation Corridor LSA Mine Site LSA Rail Alignment LSA	Construction, Operation and Closure
Laydown Areas	pH, TSS, and Metals	All	Construction and Closure
Airstrips and Airstrip Use	TSS and Petroleum Hydrocarbons	All	Construction, Operation, Closure
Mine Contact Water - Waste Rock Stockpile	pH, TSS, Metals and Nutrients	Mine Site LSA	Operation, Closure and Post Closure
Mine Contact Water - Open Pit and Run of Mine Stockpile	pH, TSS, Metals and Nutrients	Mine Site LSA	Operation, Closure and Post Closure

Residual Effects Rating Criteria

Residual effects are those effects that persist after mitigation has been applied to potential effects. Each Project-related residual effect was rated using the standard criteria described in FEIS Volume 2.0 and the VEC-specific criteria identified in Table H.3.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 364 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table H.3: Significance Ratings for Evaluating Residual Water and Sediment Quality Effects

Criteria	Classification	
<u>Magnitude</u>	Negligible	Concentrations of indicator(s) predicted to be less than threshold value(s)
	Level I	Concentrations of indicator(s) predicted to be above but within an order of magnitude of threshold value(s) (1 to 10x the threshold)
	Level II	Concentrations of Indicators predicted to be exceed threshold value(s) by an order of magnitude or greater (10 to 100x the threshold)
	Level III	Concentrations of Indicators predicted to be exceed threshold value(s) by more than two orders of magnitude (greater than 100x the threshold)
<u>Extent</u> The physical extent of the effect, relative to study area boundaries	Level I	Confined to the LSA
	Level II	Beyond the LSA and within the RSA
	Level III	Beyond the RSA
<u>Duration</u> The length of time over which a Project effect will occur	Level I	Short-term (effect lasts for up to 4 years)
	Level II	Medium-term (up to 25 years, for the life of the Project)
	Level III	Long-term (beyond the life of the Project) or permanent
<u>Frequency</u> How often the effect occurs	Level I	Infrequent – rarely occurring
	Level II	Intermittent – occasionally occurring
	Level III	Continuous
<u>Reversibility</u> The likelihood of the VEC to recover from the effect	Level I	Fully reversible after activity is complete
	Level II	Partially reversible after activity is complete
	Level III	Non-reversible after activity is complete

Of the five rating criteria used in rating residual effects, magnitude is heavily weighted when determining the significance of the residual effect and is also the criterion that requires the most interpretation. Since the main receptor affected by changes in water quality is aquatic life, magnitude ratings were established based on aquatics-related thresholds, as summarized in Table H.1.

Receiving water quality objectives (WQOs) have been established for the Protection of Freshwater Aquatic Life (CCME PAL). If receiving waters meet the selected Water Quality Objectives (CCME PAL or SSWQOs) with a discharge, this is deemed a Negligible effect to freshwater biota and hence to water and sediment quality. Level I, II and III magnitude effects are related to the relative level of exceedance of any WQOs.

The potential effects associated with discharge of mine contact water into the natural environment are well understood and have led to the enactment of the MDMER under the *Fisheries Act*. The following parameters, identified in Schedule 4 of the MDMER, are regulated by point-of-discharge concentrations:

- Arsenic
- Copper

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 365 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

- Cyanide
- Lead
- Nickel
- Zinc
- TSS
- Radium

These parameters have been regulated due to potential deleterious effects on fish and other biota in the receiving environment. Mine contact waters may be authorized for discharge under the MDMER of the *Fisheries Act*, provided the effluents at the point of discharge meet the MDMER Schedule 4 criteria and pass regular testing for acute lethality and chronic toxicity.

Baseline Characterization

Using the baseline data as a frame of reference, the following methods were applied to aqueous non-point source emissions, aqueous point source emissions and airborne emissions.

Aqueous Non-Point Source Emissions

Infrastructure and activities that were widespread or had non-point source emissions, were assessed in a qualitative manner on a Project-wide basis rather than assessing residual effects for each individual water body. To identify potential sensitivity to the particular indicators and to add context to the rating, general water quality parameters determined for the Sample Group and/or the LSA were considered. The description of the general water quality characteristics for Sample Groups (rivers/streams and lakes) is provided in FEIS, Volume 7, Tables 7-3.5 and 7-3.7.

Given the uncertainty regarding the potential contaminant source, distribution, and location that would be required to complete a quantitative assessment, a qualitative assessment was undertaken applying conservative assumptions. Examples of residual effects associated with aqueous non-point source emissions included increased TSS due to erosion and sediment transport, ML/ARD from various earth materials, nutrient additions from blasting, and petroleum hydrocarbon constituents from accidental spills.

The majority of meltwater and precipitation in the Project area occurs between June and September, the open-water period for streams and rivers. Consequently, erosion and sediment transport, nutrient and metals transport, and petroleum hydrocarbon mobilization are likely to occur in this period, when receiving waterbodies are at their maximum flows and have increased capacity to buffer these inputs.

Where residual effects were considered likely and there was a lack of reliable data available to quantify the contaminant source, a conservative approach was employed by assuming that the concentration of

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 366 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

the key indicator(s) for that particular effect would exceed the respective threshold(s) (Table 7-3.8, FEIS, Volume 7), resulting in a Level II magnitude effect. For these cases, it was further assumed that the magnitude could be maintained below a Level III effect (i.e., less than an order of magnitude greater than the threshold) by identifying the occurrence of the effect through environmental monitoring and responding appropriately under an adaptive management framework.

A conservative approach was also applied to assumptions regarding the effectiveness of mitigation measures, in recognition that there may be limitations associated with implementation and effectiveness, given the extreme climatic conditions in the Project area. Following that logic, where qualitative assessment was employed, a magnitude of Level I was only attributed to a residual effect when there was a high Level of Certainty that mitigation would be fully implemented and effective. All instances where the effectiveness of the mitigation was in question resulted in a magnitude rating of Level II.

Aqueous Point Source Emissions

For Project infrastructure and activities that generate point-source emissions with the potential to affect a specific receiving waterbody, the residual effects assessment focused on those particular locations, where adequate baseline data were available.

For point source mine contact water discharges, source terms of runoff water quality were obtained from geochemical testing (AMEC, 2012b) to compare effluent water quality to MDMER criteria, and to evaluate the resultant water quality in receiving waters compared to CCME PAL Guidelines. As a mitigation measure to maximize mixing, and to minimize changes in the natural flow regimes, discharges of mine contact waters will be carried out following the natural hydrograph. The Camp Lake tributary at MR-12 and the Mary River are gauged during the open water season, which will allow for real-time monitoring of flows and regulation of releases.

A mass balance approach was used, mixing annualized discharge flows with the annualized receiving flow at the nearest downstream location inhabited by fish. The mass balance model is shown below:

$$C_{Res} = \frac{(C_D \times Q_D) + (C_R \times Q_R)}{Q_{Res}}$$

Where:

C_D = indicator concentration in discharge (mg/L)

Q_D = volume of effluent discharged annually (m³/year)

C_R = indicator concentration in receiving waterbody (mg/L)

Q_R = volume of water in the receiving waterbody annually (m³/year)

C_{Res} = resulting (mixed) indicator concentration (mg/L)

Q_{Res} = volume of resulting (mixed) waterbody annually (m³/year)

The model assumes near-instantaneous mixing in riverine environments due to the discharge to receiving flow ratio, and no modification of indicators due to precipitation, speciation, attenuation or degradation.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 367 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Modelling was carried out using both mean and 90th percentile baseline concentrations, and under both mean and low flow (7Q10) conditions.

Mixing Assumptions

While the water quality model used above assumes instantaneous mixing, in reality Initial Dilution Zones (IDZs) will exist at each discharge. The specifics for each discharge location are discussed below.

- West Waste Rock Stormwater Pond – Stormwater will be discharged to a natural drainage (L1) that is fishless until about 100 m before the drainage discharges into a main tributary of Camp Lake (tributary L0). The receiving water is the lower reach of L0 below the falls that provide the fish barrier. Stormwater will be mixed with the natural waters in the drainage L1, and although discharge flows are greater than natural flows, it is expected that this mixing will effectively occur over the approximate 1.5 km length to where the water flows over the falls and subsequently into tributary L0, receiving further dilution.
- East Waste Rock Stormwater Pond – Stormwater will be discharged to a natural drainage (F0) that is fishless until the F0 drainage discharges into the Mary River. Stormwater will be mixed with the natural waters in the drainage F0, and although discharge flows are similar to the natural flows, it is expected that this mixing will effectively occur over the approximate 2,500 m section to where the water flows over the falls. F0 then discharges into the Mary River at a point where the flows are highly turbulent, and therefore further mixing is expected to be nearly instantaneous.
- ROM Stockpile Stormwater Pond and Ore Stockpile Stormwater Pond –These discharges will be directly to the Mary River, but at distinct locations separated by approximately 1,500 m of river. IDZs will exist downstream of each discharge. Because of the volume and turbulent nature of flows in the Mary River, the IDZs will be confined to 20 to 30 m in length.

Source Terms – Waste Rock

Mine contact water from the Waste Rock Stockpiles at the Mine Site will be collected in stormwater ponds prior to discharge. Stormwater runoff water quality (source terms) from Waste Rock Stockpiles were derived by preparing a mass loading model using laboratory derived reaction data and the anticipated site conditions. The ponds will be designed with holding capacities that act to moderate water quality. During mining, when the waste rock pile is under development, stormwater will require retention to settle out solids. The water quality modelling by AMEC (2012a) suggests that if suspended solids are properly managed, the quality of discharge will meet MDMER requirements. While water treatment is not expected to be required, treatment options will be available as a contingency measure. As a conservative measure, maximum waste rock runoff quality estimates were used in the assessment.

For a number of parameters sampled in the humidity cell tests, metals were measured at or below the analytical method detection limit (MDL) for a large proportion of samples. Generally the MDLs are high

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 368 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

relative to the selected water quality objectives (CCME PAL or SSWQOs). For these parameters, the values assigned were set at one-half the MDL (AMEC, 2012a). The 90th percentile calculated source term was influenced by predicted water quality results based largely on the non-detect results in the humidity cells for the following metals: mercury (Hg), selenium (Se), copper (Cu), arsenic (As), cadmium (Cd), chromium (Cr), silver (Ag) and thallium (Tl). Consequently, the modelled water quality for these parameters is highly conservative.

A similar issue with detection limits was identified in the baseline water quality dataset. The majority of sample results for several metals were reported as non-detect (measured below the MDL). In the baseline dataset, non-detect samples were conservatively set at the MDL. This contributed to overly conservative modelling results; i.e., when the majority of results were reported at the detection limit, the calculated values were close to or even exceeded the Water Quality Objective (WQO).

Two notable parameters, mercury and selenium, were calculated to exceed the respective WQO because of the high proportion of non-detects in both the baseline receiving waters and in the humidity cell testing.

	Mercury	Selenium
WQO (CCME PAL) (mg/L)	0.000026	0.001
90 th Percentile Baseline Concentration (mg/L)	0.0001	0.0001
% of Detects in Baseline (Measured above MDL)	2 %	2 %
Calculated Source Term (mg/L) (west discharge / east discharge)	0.004 / 0.003	0.047 / 0.038
Humidity cell testing MDL (mg/L)	0.001	0.001

As a consequence mercury and selenium are predicted to reach Level II magnitude in the assessments.

During the technical review of the DEIS, the Qikiqtani Inuit Association expressed concern over the potential for nitrates to be elevated in the waste rock stormwater runoff, due to the quantities of ammonium nitrate fuel oil (ANFO) explosives that will be used in mining.

Ammonia releases have been associated with the use of certain explosives at mining and quarrying operations. The use of ammonium nitrate and fuel oil (ANFO) explosive could cause elevated nitrates in waste rock and mine run-off. Ammonia can occur as un-ionized (NH₃) or ionized (NH₄⁺) ammonium ion species. Total ammonia is a measure of both un-ionized and ammonium ion species. The un-ionized is more toxic to aquatic life than the ionized species. Consequently, mining companies have taken a number of initiatives to address this issue. For example, Diavik Diamond Mines Inc has investigated the use, loss and mitigation measures to address nitrate losses, and as a result, has developed and implemented at its site several iterations of an Ammonia Management Plan (Diavik Diamond Mines: Ammonia Management Plan).

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 369 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Annual explosive use for blasting waste rock and ore is estimated to range from 15,700 tonnes to 18,200 tonnes per annum depending on the year. FEIS Volume 3, Appendix 3B, Attachment 8, Section 2.6 states that the emulsion:AN ratio used for the Project is 70:30. The use of emulsion improves the bulk strength of the explosive and allows efficient rock breakage. The emulsion product also reduces ANFO solubility. Modeling by other companies concludes that ammonia releases can be reduced if proper controls are not implemented. The Explosives Management Plan (FEIS Volume 3, Appendix 3B, attachment 8) and FEIS Volume 10 Section 4.3.3 outline the mitigation measures that will be taken to control the nitrate concentrations entering the receiving environment.

Commercial ammonia reduction technologies, if required, include biological treatment, air stripping, ion exchange, reverse osmosis and breakpoint chlorination. Non-commercial technologies that may have future applications include aerated lagoons, constructed wetlands, land treatment and natural treatment in ponds. (Table 5, Annex C of the Diavik Diamond Mines Ammonia Management Plans), describes for each technology an ammonia reduction estimate, the environmental effect, an evaluation of technology feasibility, capital cost and operating time frames.

Source Terms –Pit Water Quality

Preliminary estimates of pit water quality were made using a similar mass loading approach to that for the waste rock drainage quality (AMEC 2012b). Equilibrated estimates of pit water quality are presented in Table H.4. It is expected that the effluent quality during mine operations will meet MDMER requirements for metals. It is possible that, during the latter portion of the mine, pH may decrease below the lower limit of the MDMER (pH 6.0). The estimated water quality derived for the pit drainage includes allowance for acidic drainage from exposed potentially acid generating (PAG) rock toward the end of mine life. The quantity of this exposed rock and the data used in deriving this drainage quality is the subject of additional study.

It has therefore been assumed that pH adjustment of the pit water will be required in the second half of mine life and into post-Closure. During Operations, pH adjustment will most likely be carried out inside the pit before the water is pumped to the East Waste Rock Pond. Again, humidity cell testing is expected to over-estimate the runoff quality. These modelling results are very conservative and will be reviewed once data are available from recently initiated neutralizing potential-depleted humidity cell testing. This will improve confidence in drainage water quality and pH.

Although the pit water quality source term for the latter part of mine life is beyond the MDMER range for pH and may require minor pH adjustment, the source terms (assuming no treatment) have been applied in the water quality modelling as a conservative measure.

The EEM program under MDMER is specifically designed for this type of situation and is a well-designed monitoring tool. It is a tiered program, meaning that the results of monitoring are used in the design of

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 370 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

subsequent monitoring, and results also serve to identify the need for corrective action (Dumaresq *et al.* 2002).

Source Terms – Ore Runoff

Mine contact water from the ROM stockpile and the main ore stockpile at the Mine Site will be collected in stormwater ponds prior to discharge to the Mary River. Source terms were derived by calculating the 90th percentile concentrations from sampling carried out by Baffinland in 2010 from lysimeters installed in an ore stockpile generated at the site during the bulk sampling program in 2008. No runoff has been collected since then due to especially dry conditions during the 2011 field season. The runoff data, while limited, are considered conservative in that they represent runoff collected after the stockpile had been sitting dormant for two years; in reality the turnover in the ore stockpiles will be rapid and therefore the contact time between water and the ore will be limited. It has also been identified that non-representative manganese-rich ore may be a component of the lysimeter samples, since this ore was used in construction of the crusher pads where the lysimeters were located. Therefore, lysimeter results may be influenced by drainage from atypical ore.

Runoff from the ore stockpiles is not expected to require treatment beyond settlement of suspended solids in the stormwater pond. Nevertheless, treatment has been identified as a potential contingency measure that can be implemented if monitoring program results indicate that the water quality does not meet discharge criteria. More detail on contingency treatment options for mine contact water is provided in Life-of-Mine Waste Rock Management Plan (BAF-PH1-830-P16-0031).

Table H.4: Predicted Pit Water Quality

Parameters	MDMER Limits	Year 6	Year 10	Year 15	Year 21
pH	6 – 9.5	6.5	6.5	5.1	4.2
Sulphate (mg/L)		77	80	88	158
Arsenic (mg/L)	0.5	0.006	0.006	0.006	0.007
Copper (mg/L)	0.3	0.007	0.008	0.016	0.074
Lead (mg/L)	0.2	0.0005	0.0005	0.0007	0.0022
Nickel (mg/L)	0.5	0.004	0.005	0.018	0.11
Zinc (mg/L)	0.5	0.030	0.031	0.035	0.062
Aluminum (mg/L)		0.24	0.24	0.77	4.2
Antimony (mg/L)		0.007	0.007	0.007	0.008
Boron (mg/L)		0.060	0.062	0.067	0.11
Cadmium (mg/L)		0.00005	0.00005	0.00006	0.00016
Chromium (mg/L)		0.007	0.007	0.008	0.019
Cobalt (mg/L)		0.002	0.002	0.008	0.053
Iron (mg/L)		<0.002	<0.002	0.031	0.22

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 371 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Parameters	MDMER Limits	Year 6	Year 10	Year 15	Year 21
Manganese (mg/L)		0.0001	0.0001	0.10	0.57
Mercury (mg/L)		0.0013	0.0014	0.0014	0.0016
Molybdenum (mg/L)		0.023	0.024	0.024	0.027
Selenium (mg/L)		0.015	0.016	0.016	0.022
Silver (mg/L)		0.0002	0.0002	0.0002	0.0008
Thallium (mg/L)		0.0007	0.0007	0.0007	0.0009
Vanadium (mg/L)		0.0024	0.0025	0.0025	0.0029
Barium (mg/L)		0.022	0.023	0.024	0.034
Sodium (mg/L)		1.0	1.0	1.1	1.8
Potassium (mg/L)		29.2	30.1	30.2	34.9
Calcium (mg/L)		36.0	37.2	37.4	43.4
Magnesium (mg/L)		20.2	20.8	22.9	40.0
Notes: 1. Equilibrated concentrations, which assume equilibrium with amorphous Al(OH) ₃ , ferrihydrite and manganite where estimated concentrations exceed saturation indices for those phases.					

Significance Determination

The potential to result in significant adverse environmental effects was determined for each residual effect, based on professional judgment of the combination of residual effect ratings for each potential effect and taking into account the environmental context and the Level of Confidence associated with each rating.

Residual Effects Assessment

This Section presents potential effects, mitigation measures and the residual effects assessment for two categories:

- Aqueous Non-Point Source Emissions;
- Aqueous Point Source Emissions.

Aqueous Non-Point Source Emissions

Potential effects on surface water and sediment quality associated with aqueous non-point source emissions (key issues) identified in Table H.2 are described below. These emissions are common where activities take place near water bodies and may affect watercourses throughout the Project area. Locations of infrastructure and activities are described for each LSA.

Table H.5 summarizes the ratings assigned to the significance criteria of residual effects associated with each effect discussed below.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 372 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Prediction Confidence

The significance rating and confidence level assigned to the predictions of significance for aqueous non-point source discharge effects to water and sediment quality are summarized in Table H.5.

Ground Preparation and Earthworks - Impact Statement SWSQ-1

Impact Statement SWSQ-1: Project-related ground preparation and earthworks may result in changes to surface water and sediment quality in the five freshwater aquatic LSAs.

Ground preparation and earthworks are essential prerequisites during the Construction and Closure phase in all five freshwater LSAs. The areas requiring earthworks notably include the following:

- Developing each of the key areas (Milne Port, Mine Site and Steensby Port) including the construction and reclamation of buildings, laydown areas, access roads and other site infrastructure;
- Minor improvements to the roadbed of the Milne Inlet Tote Road; and
- Railway construction, including the construction access road.

Typical ground preparation activities include vegetation removal and stripping, resulting in ground surface conditions that are prone to potential erosion and liberation of potential contaminants of concern; this may have an effect on surface water quality through changes in pH or the introduction of TSS, petroleum hydrocarbons and/or nutrients. Left unmitigated, direct effects may be observed in surface water quality. By implementing standard best management practices (BMPs) during ground preparation activities, water quality effects can be avoided or reduced to the point where only incidental, minor to moderate adverse short-term effects are anticipated. As required, the following mitigation measures will be applied:

- Minimize the footprint of disturbance;
- Schedule ground preparation to maintain adequate ground cover during periods of expected rainfall;
- Install and maintain water management features, designed to segregate and prevent co-mingling of offsite water and onsite water;
- Install and maintain adequately designed erosion control features;
- Install and maintain adequately designed sediment transport control features;
- Capture and treat potentially contaminated site run-off to applicable water quality standards prior to discharging to the receiving environment; and
- Erosion control measures.

Following the ground preparation activities, earthworks (earth moving, excavation, grading, cut/fill and backfilling) are required for development of components during Construction and reclamation of components during Closure.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 373 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

The disturbance, exposure, transportation and relocation of earth materials can potentially affect surface water quality in receiving bodies adjacent to these work areas. Left unmitigated, direct effects may be observed in surface water quality including changes in pH, introduction of TSS, petroleum hydrocarbons, and/or nutrients. By implementing standard BMPs described above, water quality impacts can be avoided or reduced to the point where only minor to moderate short-term adverse effects are anticipated.

In the event that existing contamination is suspected or encountered during earthwork activities, the Hazardous Materials and Hazardous Waste Management Plan (BAF-PH1-830-P16-0011) will be used as a guideline for containment, testing, removal, treatment and disposal of contaminated media.

Soil spoils will be re-used nearby as general fill (if suitable), stored for reclamation purposes and/or disposed of in roadside borrows. Borrows will be contoured to provide stable side slopes and restore natural drainage.

Temporary roads will be decommissioned and restored through scarification as soon as practical to reduce the risk of potential effects of erosion and sediment transport. Culverts and bridges will be removed to restore pre-disturbance drainage patterns.

The Southern railway alignment and train-related infrastructure are described and illustrated in FEIS Volume3. Completion of the rail line will incorporate ground preparation and earthworks, a temporary access road, rail bed construction and rail sleeper installation. The entire rail line consists of new construction through previously unaltered landscape; therefore, potential effects on water and sediment quality are anticipated.

Rail line construction activities with the potential to affect surface water and sediment quality include culvert installation, bridge construction, infilling of right-of-way through watercourses (encroachment), rail bed construction, grading, and water management.

Standard BMPs will be employed to address potential effects during Construction and Closure. The rail bed, rail line and associated features will be designed and installed so as to avoid contamination of surface waters. Specifically, all structures will be designed, constructed and operated in compliance with *Fisheries Act* authorizations designed to protect water quality as an integral component of fish habitat. Adherence to the conditions of the *Fisheries Act* Authorizations and standard BMPs are anticipated to result in minor adverse residual effects.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 374 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table H.5: Effects Assessment Summary - Aqueous Non-Point Source Emissions

Effect		Residual Effect Evaluation Criteria					Significance
Effect	Direction & Nature of Effect	Magnitude / Complexity	Geographical Extent	Frequency	Duration	Reversibility	Rated Significance of Residual Effect
SWSQ-1 Ground preparation & earthworks	Negative Water quality (pH, TSS, metals, nutrients and hydrocarbons)	Level II: Effect is expected to result in a change greater than threshold value(s)	Level I: confined to the LSA	Level I: infrequent	Level II: will occur for the operation phase (life of the Project)	Level I: effect is reversible after activity is complete	Not Significant
SWSQ-2 Site Water Management	Negative Water quality (pH, TSS, metals, nutrients and hydrocarbons)	Level II: Effect is expected to result in a change greater than threshold value(s)	Level I: confined to the LSA	Level I: infrequent	Level I: will occur mainly during the construction phase	Level II: effect is partially reversible with cost/effort	Not Significant
SWSQ-3 Laydown Areas	Negative Water quality (pH, TSS, metals, nutrients and hydrocarbons)	Level II: Effect is expected to result in a change greater than threshold value(s)	Level I: confined to the LSA	Level I: infrequent	Level I: will occur mainly during the construction phase	Level I: effect is reversible after activity is complete	Not Significant
SWSQ-4 Explosives	Negative Water quality (pH, TSS, metals, nutrients and hydrocarbons)	Level II: Effect is expected to result in a change greater than threshold value(s)	Level I: confined to the LSA	Level I: infrequent	Level II: will occur for the operation phase (life of the Project)	Level I: effect is reversible after activity is complete	Not Significant
SWSQ-5 Quarries and Borrow Areas	Negative Water quality (pH, TSS, metals, nutrients and hydrocarbons)	Level II: Effect is expected to result in a change greater than threshold value(s)	Level I: confined to the LSA	Level I: infrequent	Level I: will occur mainly during the construction phase	Level I: effect is reversible after activity is complete	Not Significant

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 375 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Effect		Residual Effect Evaluation Criteria					Significance
Effect	Direction & Nature of Effect	Magnitude / Complexity	Geographical Extent	Frequency	Duration	Reversibility	Rated Significance of Residual Effect
SWSQ-7 Camps and Fuel Management	Negative Water quality (pH, TSS, metals, nutrients and hydrocarbons)	Level I: Effect is expected to be less than threshold values	Level I: confined to the LSA	Level II: will occur intermittently	Level II: will occur for the operation phase (life of the Project)	Level II: effect is partially reversible with cost/effort	Not Significant
SWSQ-8 Water Use and Management	Negative Water quality (pH, TSS, metals, nutrients and hydrocarbons)	Level I: Effect is expected to be less than threshold values	Level I: confined to the LSA	Level III: continuous	Level II: will occur for the operation phase (life of the Project)	Level I: effect is reversible after activity is complete	Not Significant
SWSQ-9 Airstrips and Airstrip Use	Negative TSS and Petroleum Hydrocarbons	Level II: Effect is expected to result in a change greater than threshold value(s)	Level I: confined to the LSA	Level I: infrequent	Level III: will occur beyond the life of the Project	Level I: effect is reversible after activity is complete	Not Significant

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 376 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table H.6: Significance of Residual Effects from Non-Point Source Discharges

Key Issue	Significance of Predicted Residual Environmental Effect		Likelihood ⁽¹⁾	
	Significance Rating	Level of Confidence	Probability	Certainty
SWSQ-1: Project-related ground preparation and earthworks, including road and railway construction/closure	N	2	N/A	N/A
SWSQ-2: Project-related site water management	N	2	N/A	N/A
SWSQ-3: Project-related laydown areas	N	1	N/A	N/A
SWSQ-4: Project-related explosives manufacture, storage, and use	N	2	N/A	N/A
SWSQ-5: Quarries and borrow sources	N	2	N/A	N/A
SWSQ-7: Camps, fuel storage and waste management	N	2	N/A	N/A
SWSQ-8: Water use and management	N	2	N/A	N/A
SWSQ-9: Airstrips and airstrip use	N	2	N/A	N/A
KEY: Significance Rating: S= Significant, N = Not Significant, P = Positive Level of Confidence : 1= Low; 2= Medium; 3=High (1) Likelihood - only applicable to significant effects Probability: 1= Unlikely; 2= Moderate; 3=Likely Certainty: : 1= Low; 2= Medium; 3=High				

Materials from borrow sources have undergone representative geochemical testing, which has indicated that non-reactive material is available throughout the alignment for rail bed construction. The use of non-reactive rock avoids the potential for acid generation and metals leaching that could affect surface water and sediment quality. Imported materials used in rail bed construction will be screened for other obvious contaminants that could affect nearby watercourses. In the event that existing contamination is suspected or encountered during earthwork activities, the Project's Hazardous Materials and Hazardous Waste Management Plan (BAF-PH1-830-P16-0011) will be used as a guideline for containment, testing, removal, treatment and disposal of contaminated media.

The rail sleepers will be hewn from raw wood and will not have any preservatives such as creosote or zinc chloride. One of the factors in the selection of raw wood for rail sleepers was to remove the potential for adverse water quality effects. No negative adverse effects are expected from materials leaching from the raw wood rail sleepers.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 377 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Residual Effects Rating

Magnitude

Based on a qualitative assessment, there is a potential for minor to moderate water quality effects associated with ground preparation and earthworks activities, including road and railway construction and reclamation. Generally, the mitigation measures described above are expected to prevent contact of sediment-laden water with natural surface waterbodies in the LSA. Mitigation measures may, however, have limitations, especially considering the extreme climatic conditions: the effectiveness of the installation and performance of sediment transport mitigation (e.g. silt fences) in frozen ground conditions, challenges in providing adequate ground cover, and challenges in completing earthworks in areas of permafrost.

Given the potential limitations of mitigation measures, it is anticipated that TSS loading could occasionally exceed the CCME threshold of +5 mg/L relative to baseline conditions. These effects are most likely to coincide with freshet conditions, which in themselves result in elevated TSS and have the potential to mitigate the magnitude of the potential effect through added capacity to buffer these inputs. Environmental construction monitoring is expected to be successful in identifying potential effects as they arise, and adaptive management will improve the performance of mitigation measures and thereby avoid exceedance of the CCME PAL guidelines.

In the event that existing (pre-Project) contaminated media are identified on any of the Project sites, appropriate measures will be taken to collect, treat and dispose of the material without increasing the footprint of the contamination and/or creating new pathways for contaminant transport. Currently, there are no known instances of existing contamination located in the Project area. Negligible to minor effects may be anticipated with any existing contaminated media identified during ground preparation and earthworks activities.

Based on the potential for water quality to occasionally exceed the identified thresholds, the effect was rated at Level II.

Environmental monitoring, ongoing water quality monitoring and adaptive management are expected to limit the magnitude of potential TSS related effects.

Extent

The extent of residual water and sediment quality effects associated with ground preparation and earthworks will be limited to the LSA where the infrastructure is located. Environmental construction monitoring will identify effects and where necessary, mitigation will limit the extent of the effect. The extent is rated as Level I.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 378 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Frequency

Considering the temporal relation between freshet and/or extreme weather conditions and residual water and sediment quality effects, it is anticipated that these effects will be limited to summer months when construction activities are scheduled and when freshet and the majority of rain events occur. Frequency is rated as Level I.

Duration

While ground disturbance and road and railway construction will be concentrated in the Construction phase, these facilities will require ongoing maintenance throughout the duration of the Project. The duration has been rated as Level II.

Reversibility

The potential effects are anticipated to be fully reversible, once the roads have been decommissioned and rehabilitated and natural drainage has been restored. The effect is rated as Level I.

Significance – SWSQ-1 – Project-related ground preparation and earthworks, including road and railway construction/reclamation

Based on the ratings described above, ground disturbance and earthworks activities are not expected to result in significant adverse environmental effects on the water and sediment quality VEC. The residual effect is ranked as *Not Significant* (Table H.5). The Level of Confidence associated with the significance ranking is Medium due to the combined qualitative and semi-quantitative nature of the assessment (Table H.6).

Site Water Management – Impact Statement SWSQ-2

Impact Statement SWSQ-2: Project-related site water management may result in changes to surface water and sediment quality in the five freshwater aquatic LSAs.

Management of storm water, process water and site runoff from engineered surfaces will be required throughout the five freshwater LSAs during all Project phases. The areas requiring site water management are identified in FEIS Table 3.2.1, Major Project Components, Volume 3. The approach to site water management is provided in the Surface Water and Aquatic Ecosystem Management Plan (BAF-PH1-830-P16-0026).

All stormwater sources have the potential to affect surface water quality through the alteration of Ph and/or introduction of TSS, petroleum hydrocarbons, metals and nutrients. By implementing standard BMPs such as the Land Development Guidelines for the Protection of Aquatic Habitat (DFO, 1993), adverse effects can be avoided or reduced. The following mitigation measures will be used to manage the effects of water management on surface water quality:

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 379 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

- Minimize the footprint of disturbance;
- Install and maintain water management features, designed to segregate and prevent co-mingling of offsite water and onsite water.
- Install and maintain adequately designed erosion control features;
- Install and maintain adequately designed sediment transport control features;
- Where required, locate infrastructure on competent bedrock or provide ground conditions that limit permeability and transport into the active layer; and
- Capture and treat contaminated site run-off prior to discharging to the receiving environment.

Residual Effects Rating

Magnitude

Preliminary site observations coupled with experience gained from existing operations in the Project area indicate that untreated site water can typically be managed in a way that prevents contact with natural surface waterbodies and water contained in the active layer. The underlying bedrock and permafrost conditions will act as a relatively impermeable barrier to migration of potential contaminants into groundwater.

All potentially affected stormwater sources will be collected, contained and treated to applicable water quality criteria prior to discharge. Environmental construction monitoring will focus on receiving waterbodies that have relatively soft water, i.e., sensitive to increased metal toxicity (upstream of the deposits, Mary Lake and tributaries, Camp Lake, Sheardown Lake, Ravn River and Cockburn Lake) and watercourses that are sensitive to nutrient inputs.

Based on the anticipated success of controlling stormwater and treating it to applicable discharge standards, only minor to moderate water effects are anticipated. The magnitude is rated as Level II.

Extent

Based on the scale of the surface areas where site water is being collected, the extent of residual water and sediment quality effects associated with Project-related site water management may extend beyond the LSA where the source is located, but is not anticipated to extend to the RSA scale. Environmental construction monitoring will identify residual water and sediment quality effects and where necessary, mitigation efforts will limit the extent of the effect. A Level I extent rating was assigned.

Frequency

Considering the temporal relation between freshet and/or extreme weather conditions and residual water and sediment quality effects, it is anticipated that these effects occur during summer months when construction activities are scheduled. A Level I frequency rating was assigned.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 380 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Duration

Residual water and sediment quality effects associated with site water management are expected during the Construction and Operation phases of the Project and are anticipated to coincide with the timing of freshet, when any potential effect would be expected to be diluted by high flow conditions resulting in key indicator concentrations indistinguishable from baseline. A Level I duration rating was assigned.

Reversibility

Residual surface water and sediment quality effects associated with site water management are anticipated to be partially reversible. The majority of Project areas where site water management is required will be returned to the pre-disturbed state during Closure phase. Following rehabilitation, key indicators are generally expected to return to baseline conditions through removal of the contaminant source. A Level II reversibility rating was assigned.

Significance – SWSQ-2 – Project-related Site Water Management

Based on these ratings, site water management infrastructure and site water discharge are not expected to result in significant adverse environmental effects on the water and sediment quality VEC in the five freshwater LSAs. The residual effect is ranked as *Not Significant* (Table H.5). The Level of Confidence associated with the significance ranking is Medium (Table H.6). While the assessment is qualitative, there is a high Level of Confidence in the effectiveness of mitigation measures.

Laydown Areas - Impact Statement SWSQ-3

Impact Statement SWSQ-3: Project-related laydown areas may result in changes to surface water and sediment quality in the five freshwater aquatic LSAs.

Laydown areas are temporary sites used for the storage of equipment and construction materials during the Construction and Closure phase. Requirements are dictated by equipment needs, the sequence of construction/closure activities, and the timing of material shipments. These factors will be optimized to reduce the number of anticipated laydown areas, and to minimize their anticipated footprints. The two main considerations are sediment and erosion control, and introduction of hazardous substances, leading to discharge of sediment-laden or contaminated water into the receiving environment.

Left unmitigated, direct effects may be observed through the introduction of TSS and metals. By implementing standard BMPs during development and use, water quality effects can be avoided or minimized to the point where only minor to moderate adverse effects are anticipated. In addition to the mitigation measures described in the ground preparation section, the following mitigation measures will be employed in laydown areas, as required:

- Siting of laydown areas over competent bedrock or impermeable ground layers;

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 381 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

- Placement and grading of clean, free draining material to promote a workable lay down area environment;
- Installation of adequate storm water management infrastructure to restrict runoff from overland flow or seepage through the active layer into receiving waterbodies; and
- Appropriate handling and storage of hazardous materials.

Residual Effects Rating

Magnitude

Based on a qualitative assessment, that minor to moderate water quality effects may be associated with Project-related laydown areas and activities. The mitigation measures described above, while they are expected to prevent contact of sediment-laden or contaminated water with natural surface waterbodies may have limitations associated with their implementation and effectiveness.

Given these limitations, TSS loading could occasionally exceed the CCME threshold of +5 mg/L relative to baseline conditions. These effects are most likely to coincide with freshet conditions, which have the potential to mitigate the magnitude of the potential effect through added capacity to buffer these inputs. Environmental construction monitoring will identify potential effects as they arise and adaptive management will reduce the risk of exceeding the CCME PAL guidelines.

Potentially hazardous materials will be stored in appropriate containment in designated locations away from water bodies, to reduce the potential for loss of hazardous materials to the aquatic environment.

Based on the potential for changes in water quality occasionally to exceed the identified thresholds, a Level II magnitude rating was assigned.

Extent

The extent of residual water and sediment quality effects associated with Project-related laydown areas will be limited to the LSA in which they are located. Environmental construction monitoring will identify effects and, where necessary, mitigation efforts preclude or limit the extent of the effect. A Level I extent rating was assigned.

Frequency

Considering the temporal relation between freshet and/or extreme weather conditions and residual water and sediment quality effects that these effects would be limited to summer months when construction activities are scheduled and when freshet and the majority of rain events in the Project area occur. A Level I frequency rating was assigned.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 382 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Duration

Residual water and sediment quality effects associated with laydown areas are only expected to occur during Construction and Closure. Potential effects are anticipated to coincide with the timing of freshet, when any potential effect would be expected to be diluted by high flow conditions resulting in key indicator concentrations indistinguishable from baseline. A Level I duration rating was assigned.

Reversibility

Residual surface water and sediment quality effects associated with Project-related laydown areas are anticipated to be fully reversible. Following the closure and rehabilitation, key indicators are generally expected to return to baseline conditions through removal of the contaminant source. A Level I reversibility rating was assigned.

Significance – SWSQ-3 – Project-related Laydown Areas

Based on these ratings, laydown areas are not expected to result in significant adverse environmental effects on the water and sediment quality VEC in the five freshwater LSAs. The residual effect is ranked as *Not Significant* (Table H.5). The Level of Confidence is Low due to the qualitative nature of the assessment and potential limitations related to mitigation measures (Table H.6).

Explosives Manufacture, Explosives Magazine, and Explosives Use - Impact Statement SWSQ-4

Impact Statement SWSQ-4: Project-related explosives manufacture, magazine, and use may result in changes to surface water and sediment quality in the five freshwater aquatic LSAs. Explosives transportation, storage and handling have the potential to affect surface water quality in receiving environments during the Construction, Operation and Closure phases.

Explosives will be used throughout the Project footprint area during Closure to operate quarries, make rock cuts and access aggregate. During early construction and late closure, packaged explosives and ANFO will be delivered to specific areas of use. Packaged explosives will be stored in magazine areas, which will comply with the set-back requirements of NRCan.

Permanent bulk explosives factories will be established at the Mine Site and Steensby Port as early as possible to manufacture explosives from ammonium nitrate. These will be used if possible during early closure.

Explosives (primarily ANFO) manufacture, transportation, storage and handling may result in the introduction of nitrogenous and petroleum hydrocarbon based components into surface water. Certain nitrogenous compounds can be toxic to aquatic life, depending on the form (e.g. nitrate, nitrite, or ammonia) and relative concentration. Elevated nitrogen concentrations can also result in the eutrophication of receiving waters where phosphorus is not limiting.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 383 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

The following mitigation will be used to manage potential effects on surface water and sediment quality:

- Explosives will be stored in explosives magazines positioned in accordance with the *Nunavut Mine Health and Safety Act* and Regulations. Detonators and explosives will be stored in separate magazines, and inventory will be strictly controlled by designated supervisors.
- Prefabricated magazines will be positioned and appropriately bermed to store explosives between unloading and distribution.
- If bulk mixing plants are available, ammonia nitrate (AN) will be delivered in bulk and transported by truck to the permanent storage facilities.

By implementing standard BMPs identified for explosives transportation, storage, and handling, water quality effects can be avoided or reduced to the point where only minor adverse effects are anticipated.

The mining pit will be mostly dry throughout the year; consequently ammonia or residual nitrogen is not expected to escape to the aquatic environment. During the freshet and summer months, any residual explosives washed away by precipitation will report to the waste rock pile; runoff will be channelled to a sedimentation pond, and discharge will be monitored for compliance with MDMER water quality limits.

The interaction between explosives use and water quality can be a challenge. The primary forms of mitigation to avoid contamination by nitrogen and petroleum hydrocarbons include use of appropriate weights of explosives to achieve desired blasting results, use of blast guards to prevent 'fly-away', and adequate water management features that will prevent co-mingling of contact and noncontact water. The primary area of use of explosives during Construction and Closure are quarries and borrow sources for aggregate production and are generally sited in competent ground conditions, away from sensitive receiving waterbodies, to minimize the potential for adverse effects. As an additional measure, collection sumps can be constructed to capture and treat potentially contaminated contact water prior to discharge.

Residual Effects Rating

Magnitude

Based on a qualitative assessment, minor to moderate water quality effects may be associated with explosives manufacture, transportation, magazine and use. Due to the potentially serious nature of health and safety effects, mitigation will be tightly controlled and intently managed. The permanent bulk explosives factories, ANFO mixing plants, ammonium nitrate storage facilities, and truck wash facilities will be constructed to contain any solid explosives and contact water for appropriate treatment. It is not anticipated that nitrogenous and petroleum hydrocarbon residues originating from these sources will exceed applicable CCME thresholds. Residual effects on water quality and sediment quality are expected to be negligible to minor.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 384 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

The majority of blasting during the Operation phase will be confined to the open pit where water containing elevated levels of nitrogenous and petroleum hydrocarbon residues can be collected and treated prior to discharge (described in Section 3.4.1.6).

During Construction and Closure, nitrogenous and petroleum hydrocarbon residues are likely to be released due to blasting and wastage (minimal with pre-packaged ANFO) at quarry locations and other required sites. For these other scenarios, restricting blasting during freshet, volatilization by sunlight and attenuation by vegetation and soil and containment of contact water (where possible) are expected to limit potential effects. Even with the implementation of mitigation measures, it is possible that ammonia, nitrates, nitrites and petroleum hydrocarbon residues originating from blasting activities in less confined locations may occasionally exceed their respective CCME thresholds. These effects would likely coincide with the snow melt when accumulated nitrogen and petroleum hydrocarbon residues are released during the thaw and freshet conditions. High flow conditions will moderate the magnitude of the potential effect.

Nutrient characteristics of the receiving streams and lakes are summarized in FEIS Tables 7-3.5 and 7-3.7. The findings indicate that all of the freshwater receiving environments are relatively sensitive to nutrient inputs; therefore, environmental monitoring coupled with adaptive management will limit the magnitude of residual effects.

A Level II magnitude rating was assigned.

Extent

The extent of residual water and sediment quality effects associated with Project-related explosives manufacture, transportation, magazine and use will be limited to the LSA in which it is located. Environmental monitoring will identify residual water and sediment quality effects and where necessary, mitigation efforts will limit the extent of the effect. A Level I extent rating was assigned.

Frequency

Considering the temporal relation between freshet and/or extreme weather conditions and residual water and sediment quality effects, it is anticipated that these effects would occur during summer months when construction activities are scheduled and when freshet and the majority of rain events occur. A Level I frequency rating was assigned.

Duration

Explosives manufacture, transportation, storage and use will be required during the Construction, Operation and Closure phases. Considering that the most likely uncontrolled contribution of nitrogen to the aquatic environment would come from blasting in unconfined areas along the Milne Inlet Tote Road or Railway Alignment, it is likely the source would not persist beyond the Construction phase. Nitrogen introduced in the form of ammonium would likely be assimilated into biomass rapidly, resulting in a relatively short

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 385 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

duration of effect. Since the nitrogen source will be removed after Construction, and given the anticipated rapid assimilation of ammonium, a Level II duration rating was assigned.

Reversibility

The potential effects are anticipated to be fully reversible once blasting activities have ceased. This assumes that residual nutrient levels will be attenuated through nitrification/denitrification and that the conclusion of blasting activities will terminate the nitrogen source. A Level I reversibility rating was assigned.

Significance – SWSQ-4 – Explosives Manufacture, Storage and Use

Based on the ratings described above, explosives manufacture, storage and use are not expected to result in significant adverse environmental effects on the water and sediment quality VEC. The residual effect is ranked as *Not Significant* (Table H.5). The Level of Confidence is Medium (Table H.6). Despite the qualitative nature of the assessment, there is a High Level of Confidence in the effectiveness of the identified mitigation measures.

Quarries and Borrow Sources - Impact Statement SWSQ-5

Impact Statement SWSQ-5: Project-related quarries and borrow sources may result in changes to surface water and sediment quality in the five freshwater aquatic LSAs.

Quarries and borrow sources required for rock, fill and aggregate during construction and closure are identified on FEIS Figures 3.2.1 through 3.2.9 in Volume 3. The primary concern is the potential for ML/ARD and sediment generated at these locations to affect water quality when released into the natural environment.

As a mitigation measure, materials from identified quarries and borrow sources have undergone representative geochemical testing, which has indicated that the material is non-reactive (FEIS Volume 6). Additional testing will be completed to ensure that sources used during Construction and Closure consist of non-reactive material.

Quarries and borrow sources are generally sited in competent ground conditions away from sensitive receiving waterbodies to avoid the potential for adverse effects. As an additional measure, collection sumps will capture and treat affected contact water to applicable water quality standards prior to discharge. As stated in the Borrow Pit and Quarry Management Plan (BAF-PH1-830-P16-0004) Baffinland will strive to avoid quarry site that have the potential for ML/ARD. A detailed ML/ARD testing protocol for potential quarry sites is presented in the Borrow Pit and Quarry Management Plan. Based on the results of the representative geochemical testing, it is not anticipated that treatment will be required to address ML/ARD issues.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 386 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Residual Effects Rating

Magnitude

A semi-quantitative assessment of magnitude was based on representative geochemical testing of materials from quarries and borrows sources, which indicated that the sampled materials are non-reactive (FEIS, Volume 6). The use of non-reactive materials makes it likely that run-off from quarries and borrow sources will meet the CCME thresholds for pH and metals (ML/ARD). FEIS Tables 7-3.5 and 7-3.7, which summarize acid sensitivity of the receiving streams and lakes, indicate that none of the streams or lakes is particularly sensitive to acidic inputs.

Nitrogenous and petroleum hydrocarbon residues originating from blasting activities, as well as sediment-laden water, will be confined to the water management infrastructure within each quarry and borrow site. While mitigation measures will prevent contact of storm water with natural surface waterbodies, they may have limitations associated with their implementation and effectiveness. Given these limitations, it is anticipated that uncontrolled discharges of water from quarries and borrow sources may occasionally exceed applicable CCME thresholds. These exceedances would likely coincide with freshet conditions during snow melt; this will mitigate the potential effect through dilution.

Environmental construction monitoring will be comprehensive, with an emphasis on those receiving bodies that have relatively soft water quality, a condition that can result in increased susceptibility to metals uptake.

A Level II magnitude rating was assigned.

Extent

The extent of residual water and sediment quality effects associated with quarry or borrow sources will be limited to the LSA in which they are located. The relative insensitivity of watercourses to acidic inputs suggests a relatively high potential to buffer through elevated levels of calcium carbonates that are present. Environmental monitoring will identify effects and, where necessary, mitigation efforts will limit their extent. A Level I extent rating was assigned.

Frequency

Considering the temporal relation between freshet and/or extreme weather conditions and residual water and sediment quality effects, these effects will be limited to summer months when construction/closure activities are scheduled and when freshet and the majority of rain events occur. A Level I frequency rating was assigned.

Duration

Quarries and borrow sources will be required during the Construction and Closure phase. Potential effects are anticipated to coincide with the timing of freshet, when any potential effect will be diluted by high flow

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 387 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

conditions, resulting in key indicator concentrations indistinguishable from baseline. A Level I duration rating was assigned.

Reversibility

The potential effects associated with quarry or borrow sources are anticipated to be fully reversible once blasting is completed and these locations have been closed and rehabilitated. A Level I reversibility rating was assigned.

Significance – SWSQ-5 – Quarries and Borrow Sources

Based on the ratings described above, the residual effect is ranked as *Not Significant* (Table H.5). The Level of Confidence associated with the significance ranking is Medium due to the semi-quantitative nature of the assessment (Table H.6).

Camps, Fuel Storage and Waste Management – Impact Statement SWSQ-7

Impact Statement SWSQ-7: Project-related camps, fuel storage and waste management may result in changes to surface water and sediment quality in the five freshwater aquatic LSAs.

Temporary and permanent camps will be located throughout the Project area as described and illustrated in FEIS Volume 3. The potential effects include changes in water and sediment quality due to withdrawal, waste management, fuel storage, and discharge of sewage.

In order to protect water quality, the following management actions have been adopted at waste management facilities:

- Incineration of non-hazardous combustible wastes;
- Landfilling of inert non-combustible wastes;
- Temporary storage and off-site shipping of hazardous and recyclable waste materials; and
- On-site treatment for hydrocarbon-impacted materials (soil, water, ice, and snow).

Diesel, gasoline and aviation fuel will be delivered to temporary camp locations via tanker trucks and will be stored in double-walled fuel tanks located on foundations equipped with impermeable bermed liners and bedding materials. The storage site will be far enough removed from receiving watercourses to reduce the potential for water quality effects.

Fuel will be delivered to the camps at Milne Port, the Mine Site and Steensby Port via marine vessels and tanker trucks and will be stored in large volume double-walled tanks located on foundations equipped with impermeable bermed liners and bedding materials. Within the bermed fuel storage areas, any fuel-contact water will be collected in engineered drainage and sumps, treated to applicable water quality standards, and then discharged if it does not exceed the CCME thresholds for TSS, oil and grease, or petroleum hydrocarbons.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 388 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Residual Effects Rating

Magnitude

Effects associated with fuel storage and use and waste management were all assessed qualitatively. Mitigation measures described above will prevent the discharge of fuel contact water that exceeds CCME thresholds for TSS, oil and grease, or petroleum hydrocarbons.

Waste management mitigation as described above will limit any potentially adverse effects to a negligible to minor magnitude.

A Level I magnitude rating was assigned.

Extent

The extent of the potential effect is likely to be limited to watercourses located in the LSA in which a camp is situated. A Level I extent rating was assigned.

Frequency

The frequency of potential effects will be periodic and limited to summer months when the majority of precipitation falls in the Project Area. A Level II frequency rating was assigned.

Duration

Camps, fuel storage and waste management will be required during Construction and Operation; therefore, a Level II duration rating was assigned.

Reversibility

The potential effects are anticipated to be partially reversible once this infrastructure is decommissioned and rehabilitated. A Level II reversibility rating was assigned.

Significance – SWSQ-7 – Camps, Fuel Storage and Waste Management

Based on these ratings, construction and operation of camps, fuel storage and waste management are not expected to result in significant adverse environmental effects on the water and sediment quality VEC. The residual effect is ranked as *Not Significant* (Table H.5). The Level of Confidence is Medium (Table H.6). While the assessment is qualitative in nature, there is a High Level of Confidence in the effectiveness of mitigation measures.

Water Use and Management - Impact Statement SWSQ-8

Impact Statement SWSQ-8: Project-related water use and management may result in changes to surface water and sediment quality in the five freshwater aquatic LSAs.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 389 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Water withdrawal will support a number of Project-related activities (FEIS Tables 7-2.5, 7-2.6, 7-2.9 and 7-2.10). Withdrawal from these sources has the potential for indirect effects on surface water quality by reducing the total volume of water in the system at that location.

Various Project-related water uses have the potential to affect water and sediment quality when process water is released back into the freshwater environment, including:

- Aggregate washing;
- Concrete manufacture;
- Concrete curing;
- Truck wash; and
- Equipment/floor wash-down.

Water for aggregate washing will be pumped from the potable water source and stored in a designated washing area. The main consideration with aggregate wash water is the potential for it to contain a high TSS concentration. Wash water will be reused and recycled to the extent possible, and solids will be settled out prior to discharge.

Water used for concrete manufacture and curing will be pumped from the potable water source and stored at the batch plant. Volumetric trucks will be used for remote concrete pours, and standard BMPs will be put in place to ensure that untreated contact water is not discharged. The main consideration with concrete contact water is the potential to contain elevated TSS and pH, which may affect water quality in the environment. Concrete contact water will be treated through settlement and with pH adjustment (e.g. carbon dioxide sparging) prior to discharge.

Truck wash facilities will be constructed with water management features designed to segregate and prevent co-mingling of offsite and onsite water. A drain system and sump will capture and treat potentially contaminated water to applicable quality standards prior to discharge.

Snow, ice, soil or water that has been contaminated by petroleum hydrocarbons has the potential to impair water quality. Any such materials will be transported to lined, bermed treatment landfarm facilities, and materials that have been in contact with oil will be transported to the same locations for treatment in oil/water treatment facilities in the maintenance shops. Contaminated snow will be placed into cells in the landfarms; after thawing it will be treated and discharged. Discharges will not be directed into the freshwater environment; therefore, only minor adverse effects are anticipated from incidental occurrences.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 390 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Residual Effects Rating

Magnitude

Negligible to minor magnitude residual water quality effects may be associated with water abstraction (FEIS Tables 7-2.5, 7-2.6, 7-2.9 and 7-2.10). Water used for other activities (e.g., aggregate washing, concrete manufacture, concrete curing, and dust suppression for the quarry crusher) will be managed to ensure the discharges meet applicable CCME water quality guidelines. Negligible to minor water and sediment quality effects are anticipated.

Potential effects of contaminated by petroleum hydrocarbons were assessed qualitatively. Based on the mitigation described above, it is anticipated that treated contact water discharges will meet applicable CCME water quality guidelines and only negligible to minor adverse effects are expected.

A Level I magnitude rating was assigned.

Extent

The extent of the potential effect is likely to be limited to watercourses from which the abstraction or water use is occurring. A Level I extent rating was assigned.

Frequency

The frequency of the potential effect will be year round, while seasonal discharge of treated contact water will occur during freshet. A Level III frequency rating was assigned.

Duration

Effects are anticipated to last through the Construction, Operation and Closure phases; therefore, a Level II duration rating was assigned.

Reversibility

The potential effects are anticipated to be fully reversible, once water withdrawal and treated contact water discharge are discontinued. A Level I reversibility rating was assigned.

Significance – SWSQ-8 – Water Use and Management

Based on these ratings, water use and management are not expected to result in significant adverse environmental effects on the water and sediment quality VEC. The residual effect is ranked as *Not Significant* (Table H.5). The Level of Confidence is Medium (Table H.6). While aspects of the assessment are qualitative, there is a High Level of Confidence in the effectiveness of mitigation measures.

Airstrips and Airstrip Use - Impact Statement SWSQ-9

Impact Statement SWSQ-9: Project-related airstrips and airstrip use may result in changes to surface water and sediment quality in the five freshwater aquatic LSAs.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 391 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

The airstrip and related infrastructure are described in FEIS Volume 3. Its construction, operation and closure have the potential to affect surface water quality in adjacent water bodies. The primary concern during Closure stems from erosion and sediment transport during ground preparation and earthworks. Mitigation measures are summarized in the sections above.

The primary concern stems from the possibility of contaminating nearby water bodies with runoff from the surface of the airstrip, including de-icing agents such as propylene glycol. De-icing by a portable discharge unit will be carried out in a defined area to the side of the runway using propylene glycol. A synthetic organic polymer (EK 35) will be used as a dust suppressant on the airstrips as needed.

Water management features will be installed and maintained to prevent co-mingling of offsite water with potentially affected onsite water. Any potentially contaminated water will be treated to applicable quality standards prior their discharge.

Residual Effects Rating

Magnitude

As a result of the crowned configuration of the airstrip, surface run-off will be directed to drainage collection structures around the perimeter. Mitigation measures will prevent contact of sediment-laden water with natural surface waterbodies; however, mitigation measures may have limitations associated with their implementation and effectiveness. Given these limitations, it is anticipated that TSS loading could occasionally exceed the CCME threshold of +5 mg/L relative to baseline conditions. These exceedances would likely coincide with freshet conditions during snow melt, which is likely to dilute and mitigate any potential effects.

Use of propylene glycol is anticipated to result in negligible to minor water quality effects as collection and treatment will to ensure that the CCME interim guideline is not exceeded.

The synthetic organic polymer EK 35 is not an identified substance under CCME PAL; therefore, it is recommended that potential effects be assessed through routine water quality monitoring.

Based on the potential for infrequent exceedances of applicable CCME thresholds, a Level II magnitude rating was assigned.

Extent

The extent of the potential effect is likely to be limited to waterbodies adjacent to the airstrips. A Level I extent rating was assigned.

Frequency

The frequency of potential effects will be limited to summer months, when the majority of precipitation falls in the Project Area. A Level I frequency rating was assigned.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 392 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Duration

Airstrips and airstrip use will be required during Construction, Operations and Closure. Potential effects are anticipated to coincide with the timing of freshet, when high flows will act to reduce concentrations and render them indistinguishable from baseline. A Level III duration rating was assigned.

Reversibility

The potential effects are anticipated to be fully reversible once the infrastructure is decommissioned and rehabilitated and de-icing and dust suppression ceases. A Level I reversibility rating was assigned.

Significance – SWSQ-9 – Airstrips and Airstrip Use

Based on these ratings, airstrips and airstrip use are not expected to result in significant adverse environmental effects on the water and sediment quality VEC. The residual effect is ranked as *Not Significant* (Table H.5). The Level of Confidence is Medium (Table H.6). While the assessment is qualitative, there is a high Level of Confidence in the effectiveness of the identified mitigation measures.

Aqueous Point Source Emissions

Potential effects on surface water and sediment quality associated with aqueous point source emissions (key issues) identified in Table H.2 are described below. These emissions are from a single, identifiable, localized source and affect a specific receiving waterbody. Locations of infrastructure and activities involving each aqueous point source emission are presented by LSA.

Table H.7 summarizes the ratings assigned to the significance criteria of residual effects associated with each effect discussed below.

Prediction Confidence

The confidence level assigned to the predictions of significance for aqueous non-point source discharge effects to water and sediment quality are summarized in Table H.8.

Milne Port LSA

All aqueous point source emissions from the Milne Port LSA are directed into Milne Inlet (marine environment) via surface release through a combination of constructed/natural drainage to areas that have no identified sensitive receptors (i.e., fish and/or fish habitat). Due to the absence of sensitive secondary receptors, an assessment of freshwater effects was not completed. The assessment of residual effects associated with emissions into the marine environment, where secondary receptors are located, is addressed in FEIS Volume 8.

Milne Inlet Tote Road LSA

No aqueous point source emissions into the freshwater receiving environment are located in the Milne Inlet Tote Road LSA.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 393 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table H.7: Effects Assessment Summary - Aqueous Point-Source Discharges

Effect		Residual Effect Evaluation Criteria					Significance
Effect	Direction & Nature of Effect	Magnitude / Complexity	Geographical Extent	Frequency	Duration	Reversibility	Rated Significance of Residual Effect
SWSQ-10 West Waste Rock Stormwater Discharge to Camp Lake and Tributaries	Negative Water quality (pH, TSS, metals, ammonia, nitrite)	Level II: Concentrations of indicator(s) predicted to exceed threshold value(s) by an order of magnitude or greater	Level I: confined to the LSA	Level II: will occur frequently	Level III: long-term/permanent	Level II: effect is partially reversible (water treatment, if required)	Not Significant
SWSQ-11 Waste Rock and Ore Stormwater Discharge to Mary River	Negative Water quality (pH, TSS, metals, ammonia, nitrite)	Level I: concentrations of indicator(s) predicted to be above but within an order of magnitude of threshold value(s)	Level I: confined to the LSA	Level II: will occur frequently	Level II: will occur for the Operation phase (life of the Project)	Level II: effect is partially reversible (water treatment, if required)	Not Significant
SWSQ-12 Exploration Drilling Runoff to Mary River	Negative Water quality (pH, TSS, chlorides)	Level I: concentrations of indicator(s) predicted to be above but within an order of magnitude of threshold value(s)	Level I: confined to the LSA	Level II: will occur frequently	Level II: will occur for the Operation phase (life of the Project)	Level I: effect is reversible after activity is complete	Not Significant
SWSQ-13 Pit Lake and Waste Rock Discharges to Mary River in Post-closure	Negative Water quality (pH, TSS, metals)	Level I: concentrations of indicator(s) predicted to be above but within an order of magnitude of threshold value(s)	Level I: confined to the LSA	Level II: will occur frequently	Level III: long-term/permanent	Level II: effect is partially reversible (water treatment, if required)	Not Significant

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 394 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Effect		Residual Effect Evaluation Criteria					Significance
Effect	Direction & Nature of Effect	Magnitude / Complexity	Geographical Extent	Frequency	Duration	Reversibility	Rated Significance of Residual Effect
SWSQ-14 Exploration Camp WWTF Effluent Discharge to Sheardown Lake	Negative Water quality (pH, TSS, BOD, nutrients, ammonia)	Level I: Effect is expected to be less than threshold values	Level I: confined to the LSA	Level II: will occur frequently	Level II: will occur for the Operation phase (life of the Project)	Level I: effect is reversible after activity is complete	Not Significant
SWSQ-15 Mine Site WWTF Effluent Discharge to Mary River	Negative Water quality (pH, TSS, BOD, nutrients, ammonia)	Level I: Effect is expected to be less than threshold values	Level I: confined to the LSA	Level II: will occur frequently	Level II: will occur for the Operation phase (life of the Project)	Level I: effect is reversible after activity is complete	Not Significant

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 395 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Table H.8 Significance of Residual Effects from Point Source Discharges

Key Issue	Significance of Predicted Residual Environmental Effect		Likelihood ⁽¹⁾	
	Significance Rating	Level of Confidence	Probability	Certainty
SWSQ-10 West Waste Rock Stormwater Discharge to Camp Lake and Tributaries	N	3	N/A	N/A
SWSQ-11 Waste Rock and Ore Stormwater Discharge to Mary River	N	3	N/A	N/A
SWSQ-12 Exploration Drilling Runoff to Mary River	N	2	N/A	N/A
SWSQ-13 Pit Lake and Waste Rock Discharges to Mary River in Post-closure	N	2	N/A	N/A
SWSQ-14 Exploration Camp WWTF Effluent Discharge to Sheardown Lake	N	2	N/A	N/A
SWSQ-15 Mine Site Camp WWTF Effluent Discharge to Mary River	N	2	N/A	N/A
KEY: Significance Rating: S= Significant, N = Not Significant, P = Positive Level of Confidence : 1= Low; 2= Medium; 3=High (1) Likelihood - only applicable to significant effects Probability: 1= Unlikely; 2= Moderate; 3=Likely Certainty: : 1= Low; 2= Medium; 3=High				

Mine Site LSA

Impact Statements SWSQ-10 to SWSQ-13: Project-related discharges of mine contact water may result in impaired surface water and sediment quality in the Mine Site LSA.

Management of storm water and process water that has been in contact with the iron ore (mine contact water) is required at the Mine Site. Plans and drawings illustrating proposed site water management infrastructure for mine contact water are provided in the Surface Water and Aquatic Ecosystem Management Plan (BAF-PH1-830-P16-0026). The following sources have been identified for inclusion in the aqueous point source emissions assessment because they involve mine contact water that will be discharged into the freshwater environment:

- Waste Rock Stockpile runoff to Camp Lake and Tributaries (SWSQ-10);
- Waste rock and ore stockpile runoff to Mary River (SWSQ-11);
- Exploration drilling runoff (SWSQ-12); and

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 396 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

- Pit lake water and waste rock discharges to Mary River in post-closure (SWSQ-13).

The development of source terms (runoff water quality estimates) for waste rock, ore and pit water is described above.

Given the variability in runoff flows, the ponds were sized to accommodate the two-year extreme event. Discharge is anticipated to be distributed evenly with the natural flows from approximately mid-June until September.

Details regarding theoretical treatment options are provided in the Life-of-Mine Waste Rock Management Plan (BAF-PH1-830-P16-0031). The main findings suggest that, with sufficient storage and upstream control, any water quality issues that arise can be managed. If the only challenge with the water quality is TSS concentration, this will often be solved using retention time alone. With a buffer pond that has a sufficiently large retention time it is possible to allow particles to settle while discharging - either by gravity or pumping - in a continuous system.

All mine contact water (including that from the ore stockpiles) in the Milne Port and Steensby Port LSAs is discharged to the ocean; their potential effects are assessed in FEIS Volume 8.

Residual effects ratings for the various mine contact water discharges are provided below.

Waste Rock Stormwater Discharge to Camp Lake and Tributaries - Impact Statement SWSQ-10

Runoff discharged from the West Waste Rock Stockpile Pond (Pond 1) has the potential to adversely affect water quality in the tributary of Camp Lake to which stormwater will be discharged, and downstream into Camp Lake.

Contact water (runoff) from the Waste Rock Stockpile will be settled in the west pond (Pond 1) prior to discharge to tributary L1, which in turn reports to tributary L0 and subsequently to Camp Lake. The arrangement of the stockpile, the sedimentation pond and the receiving environment are illustrated in Life-of-Mine Waste Rock Management Plan. It is predicted, based on waste rock seepage modelling, that runoff from the stockpile will meet MDMER requirements (Life-of-Mine Waste Rock Management Plan (BAF-PH1-830-P16-0031)).

Background water quality was measured in the open-water seasons (June to September) of 2006, 2007, 2008 and 2011. Open-water season means were calculated for key water quality parameters at sampling locations L0-01, L1-02 and L1-08. Water quality sampling included analysis of routine water quality parameters identified in the Baseline Water and Sediment Quality Report in FEIS Appendix 7B-1. Background mean and 90th percentile baseline concentrations were applied to the modelling.

Mean and low flow rates (or annual volumes) were obtained from hydrological surveys conducted over five years (2006, 2007, 2008, 2010 and 2011).

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 397 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

A mass balance approach was applied using the methodology described above to estimate water quality in the receiving waters under mean flow conditions and by discharging runoff following the natural hydrograph. Resultant water quality in Camp Lake tributary L1 (at the location of falls which prevent the upstream passage of fish), downstream where L1 reports to tributary L0 and then at Camp Lake is presented in Table H.9. The same analysis during the 10-year dry year is presented in Table H.10.

Residual Effects Rating

Magnitude

The mass balance modelling indicates that several parameters will have Level II magnitude effects to water quality under both mean and low flow conditions at the nearest downstream location inhabited by fish at L0, and in Camp Lake (Hazard Quotient - HQ of >1 and <10). An HQ >10 and <100 was applied for mercury using 90th percentile baseline concentrations. All other parameters are at Level I or lower.

As mentioned above, each of the metals showing an HQ >1 (a Level I effect) or HQ >10 (a Level II effect) is identified in the humidity cell testing as having >50 % non-detects, and half the detection limits were assumed for non-detect results. Consequently, the derived source terms for these metals are substantially based on the MDLs. Most of these same parameters (including arsenic, cadmium, chromium, mercury, selenium and silver, as well as other metals that do not trigger a Level I effect) have measured baseline concentrations that are mostly non-detect, and therefore the calculated mean or 90th percentile concentrations are substantially based on MDLs. On this basis, the assignment of a Level II magnitude rating for water and sediment quality effects arising from discharge of stormwater from the west waste rock pond to the Camp Lake tributaries and Camp Lake is considered to be highly conservative. Baffinland is exploring options for re-testing or additional testing to obtain a dataset of more precise measurements for these parameters.

Aquatic Effects Monitoring, Environmental Effects Monitoring and routine water quality monitoring are expected to identify potential effects as they arise, and adaptive management will reduce the risk of exceeding the predicted effects level.

Duration

Discharge of mine contact water from the West Waste Rock Pond into the lower reach of Camp Lake tributary L1 will be required during the Operation, Closure and post-closure phases of the Project; a Level III duration rating was assigned.

Frequency

The frequency of the potential effect will be annual, limited to the period between June and September. A Level II frequency rating was assigned.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 398 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Extent

The extent of the potential effect is expected to be limited to the Mine Site freshwater LSA and to reach negligible levels where Camp Lake discharges into Mary Lake. A Level I extent rating was assigned.

Reversibility

The potential effects are anticipated to be partially reversible. A Level II reversibility rating was assigned.

Significance – SWSQ-10 – West Waste Rock Stormwater Discharge to Camp Lake and Tributaries

Based on these ratings, discharge of mine contact water from the West Waste Rock Sedimentation Pond into the tributary of Camp Lake is not expected to result in an adverse environmental effect on water and sediment quality in the Mine Site LSA. The residual effect is ranked as *Not Significant* (Table H.7). The Level of Confidence (Table H.8) is High due to the quantitative nature and conservative assumptions of the assessment. Additionally the EEM requirements of MDMER provide assurance that effects will be detected and necessary corrective actions implemented.

Table H.9: Predicted Water Quality in Camp Lake Tributaries and Camp Lake Under Mean Flow Conditions

									WATER QUALITY IN THE RECEIVING WATERS									
Parameter	Units	Baseline Water Quality (L0-01, L1-02, L1-08)			Baseline Water Quality Camp Lake	Receiving Water Quality Objectives (Note 5)	Discharge Scenario		CAMP LAKE TRIB L1 BEFORE DISCHARGE TO TRIB L0				MOUTH OF TRIB L0 AT OUTLET TO CAMP LAKE				CAMP LAKE	
							Flows Used		Discharge Equalized to Mean Summer Flow Discharge Volume = 843,000 m³/yr Mean Baseline Flows in L1 = 790,807 m³/yr				Discharge Equalized to Summer Flow - Additional Dilution in L0 Discharge Flows = 1,633,807 m³/yr Mean Baseline Flows in L0 (MR-10) at outlet to lake = 976,453 m³/yr				Assume Instantaneous Mixing within lake = 27,511,100 m³ Discharge Flows into Camp Lake (MR- 10 Outlet Flows + Discharge Volume) = 2,610,260 m³/yr	
		Baseline Concentrations		Mean	HQ				90th Percentile	HQ	Mean	HQ	90th Percentile	HQ	Mean (Lake) 90th Percentile (Streams)	HQ		
							MDMER	West Waste Rock Pile Source Terms										
pH		7.84	8.38		7.61	6.5 - 9.0	-	6.9	7.35	-	7.62	-	7.54	-	7.90	-	7.64	-
Hardness	mg/L CaCO ₃	74.11	121.00		57.69	-	-	-	-	-	-	-	-	-	-	-	-	-
Aluminum	mg/L	0.0190	0.0390	82%	0.0095	0.94	-	0.12	0.071	0.1	0.081	0.1	0.052	0.05	0.065	0.07	0.0143	0.02
Antimony	mg/L	-	0.0004	0%	0.00010	-	-	0.0031	-	-	0.0018	-	-	-	0.0013	-	0.00020	-
Arsenic	mg/L	-	0.0050	6%	0.00018	0.005	0.50	0.0025	-	-	0.0037	0.7	-	-	0.0042	0.8	0.00053	0.1
Barium	mg/L	0.0093	0.0119	59%	0.00565	-	-	0.064	0.038	-	0.039	-	0.027	-	0.029	-	0.0076	-
Beryllium	mg/L	-	0.0050	0%	0.00050	0.0053	-	-	-	-	-	-	-	-	-	-	-	-
Boron	mg/L	-	0.0320	10%	0.01000	1.5	-	0.025	-	-	0.028	0.02	-	-	0.030	0.02	0.012	0.01
Cadmium	mg/L	-	0.00010	10%	0.000023	0.000029	-	0.000020	-	-	0.00006	2.0	-	-	0.00007	2.6	0.00003	0.9
Chromium	mg/L	-	0.0010	10%	0.00055	0.0047	-	0.0029	-	-	0.0020	0.4	-	-	0.0016	0.3	0.00064	0.1
Cobalt	mg/L	-	0.0003	4%	0.00011	-	-	0.00079	-	-	0.00055	-	-	-	0.00046	-	0.00014	-
Copper	mg/L	0.0015	0.0020	94%	0.00207	0.0047	0.30	0.0031	0.0023	0.5	0.0026	0.5	0.0020	0.4	0.0024	0.5	0.0021	0.4
Iron	mg/L	0.0471	0.0610	67%	0.03152	1.2	-	<0.002	0.023	0.02	0.030	0.03	0.032	0.03	0.042	0.03	0.032	0.03
Lead	mg/L	0.0002	0.0007	18%	0.000171	0.001	0.20	0.00020	0.0002	0.2	0.00044	0.4	0.0002	0.2	0.001	0.5	0.0002	0.2
Manganese	mg/L	0.0063	0.0100	51%	0.002289	-	-	0.00004	0.0031	-	0.0049	-	0.004	-	0.0068	-	0.002678	-
Mercury	mg/L	-	0.00010	2%	0.000040	0.000026	-	0.00057	-	-	0.00034	13	-	-	0.00025	9.7	0.000058	2.2
Molybdenum	mg/L	0.0027	0.0050	46%	0.000620	0.073	-	0.010	0.0065	0.1	0.0076	0.1	0.0051	0.07	0.0066	0.09	0.0011	0.02
Nickel	mg/L	0.0030	0.0050	32%	0.00109	0.083	0.50	0.0019	0.0024	0.03	0.0034	0.04	0.0026	0.03	0.0040	0.05	0.0013	0.02
Selenium	mg/L	-	0.0050	2%	0.00100	0.001	-	0.0077	-	-	0.0064	6	-	-	0.0059	5.87	0.0014	1.4
Silver	mg/L	-	0.0001	4%	0.000017	0.0001	-	0.000064	-	-	0.00008	0.8	-	-	0.00009	0.9	0.000023	0.2
Thallium	mg/L	-	0.0002	0%	0.00010	0.0008	-	0.00029	-	-	0.00025	0.3	-	-	0.00023	0.3	0.00011	0.1
Uranium	mg/L	0.0016	0.0027	100%	0.000402	0.015	-	-	-	-	-	-	-	-	-	-	-	-
Vanadium	mg/L	-	0.0010	2%	0.00100	0.006	-	0.0010	-	-	0.0010	0.2	-	-	0.0010	0.2	0.0010	0.2
Zinc	mg/L	0.0020	0.0030	25%	0.00247	0.03	0.50	0.013	0.008	0.3	0.008	0.3	0.006	0.2	0.006	0.2	0.00280	0.1
NOTES: 1. MODEL ASSUMES COMPLETE NEAR INSTANTANEOUS MIXING OF EFFLUENT AND RECEIVING WATER. 2. NO MEAN CONCENTRATION CALCULATED WHERE THE MAJORITY OF SAMPLING RESULTS WERE BELOW THE METHOD DETECTION LIMIT 3. EFFLUENT SOURCE TERMS PROVIDED BY AMEC (JANUARY, 2012). 4. EFFLUENT SOURCE TERM OF 0.001 USED IN CALCULATIONS FOR IRON 5. RECEIVING WATER QUALITY OBJECTIVES OBTAINED FROM CANADIAN COUNCIL OF MINISTERS OF THE ENVIRONMENT (CCME) CANADIAN WATER QUALITY GUIDELINES FOR THE PROECTION OF AQUATIC LIFE (PAL) (2003), CONTINUOUS CONCENTRATION (CHRONIC) NATIONAL RECOMMENDED WATER QUALITY CRITERIA (UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (2006)), BRITISH COLUMBIA MINISTRY OF ENVIRONMENT APPROVED AND WORKING WATER QUALITY GUIDELINES OR SUTER THRESHOLDS, AS APPLICABLE. 6. IN ORDER TO ESTIMATE EFFLUENT SOURCE TERMS, HALF THE METHOD DETECTION LIMIT OF A PARAMETER WAS ADOPTED WHERE MORE THAN HALF OF THE RESULTS FOR THAT PARAMETER WERE NON-DETECT (I.E. LESS THAN THE MDL). THESE EFFLUENT SOURCE TERMS ARE HIGHLIGHTED IN BLUE. 7. RESULTS WITH AN HQ GREATER THAN 1 ARE HIGHLIGHTED IN ORANGE, TO FOCUS DISCUSSION IN THE EFFECTS ASSESSMENT.																		

Table H.10: Predicted Water Quality in Camp Lake Tributaries and Camp Lake In A Dry Year

									WATER QUALITY IN THE RECEIVING WATERS									
Parameter	Units	Baseline Water Quality (L0-01, L1-02, L1-08)			Baseline Water Quality Camp Lake	Receiving Water Quality Objectives (Note 5)	Discharge Scenario		CAMP LAKE TRIB L1 BEFORE DISCHARGE TO TRIB L0				MOUTH OF TRIB L0 AT OUTLET TO CAMP LAKE				CAMP LAKE	
							Flows Used		Discharge Equalized to 10-Year Low Flow Discharge Volume = 354,060 m³/yr 10-Year Low Baseline Flows in L1 = 332,139 m³/yr				Discharge Equalized to 10-Year Low Flow - Additional Dilution in L0 Discharge Flows = 686,199 m³/yr 10-Year Low Baseline Flows in L0 (MR-10) at outlet to lake = 410,110 m³/yr				Assume Instantaneous Mixing within lake = 27,511,100 m³ Discharge Flows into Camp Lake (MR-10 Outlet Flows + Discharge Volume) = 1,096,309 m³/yr	
		Mean Concentration	90th Percentile Concentration	% Detects	Mean Concentration													
							MDMER	West Waste Rock Pile Source Terms										
pH		7.84	8.38		7.61	6.5 - 9.0	-	6.9	7.35	-	7.62	-	7.54	-	7.90	-	7.62	-
Hardness	mg/L CaCO ₃	74.11	121.00		57.69	-	-	-	-	-	-	-	-	-	-	-	-	-
Aluminum	mg/L	0.0190	0.0390	82%	0.0095	0.94	-	0.286	0.157	0.2	0.166	0.2	0.105	0.11	0.119	0.13	0.0137	0.01
Antimony	mg/L	-	0.0004	0%	0.00010	-	-	0.007	-	-	0.004	-	-	-	0.003	-	0.0002	-
Arsenic	mg/L	-	0.0050	6%	0.00018	0.005	0.50	0.006	-	-	0.0055	1.1	-	-	0.0053	1.06	0.00038	0.08
Barium	mg/L	0.0093	0.0119	59%	0.00565	-	-	0.152	0.083	-	0.084	-	0.056	-	0.057	-	0.0076	-
Beryllium	mg/L	-	0.0050	0%	0.00050	0.0053	-	-	-	-	-	-	-	-	-	-	-	-
Boron	mg/L	-	0.0320	10%	0.01000	1.5	-	0.060	-	-	0.046	0.03	-	-	0.041	0.03	0.0112	0.01
Cadmium	mg/L	-	0.00010	10%	0.000023	0.000029	-	0.00005	-	-	0.00007	2.5	-	-	0.00008	2.9	0.00003	0.87
Chromium	mg/L	-	0.0010	10%	0.00055	0.0047	-	0.007	-	-	0.0040	0.9	-	-	0.0029	0.62	0.00064	0.14
Cobalt	mg/L	-	0.0003	4%	0.00011	-	-	0.0019	-	-	0.0011	-	-	-	0.0008	-	0.00014	-
Copper	mg/L	0.0015	0.0020	94%	0.00207	0.0047	0.30	0.007	0.0045	1.0	0.0048	1.0	0.0034	0.7	0.0037	0.8	0.00213	0.5
Iron	mg/L	0.0471	0.0610	67%	0.03152	1.2	-	0.002	0.024	0.02	0.031	0.03	0.033	0.03	0.042	0.0351	0.032	0.03
Lead	mg/L	0.0002	0.0007	18%	0.000171	0.001	0.20	0.0005	0.0003	0.3	0.0006	0.6	0.0003	0.3	0.0006	0.6	0.00019	0.2
Manganese	mg/L	0.0063	0.0100	51%	0.002289	-	-	0.00010	0.0031	-	0.0049	-	0.0043	-	0.0068	-	0.0025	-
Mercury	mg/L	-	0.00010	2%	0.000040	0.000026	-	0.001	-	-	0.00075	29	-	-	0.00051	19.46	0.000058	2.23
Molybdenum	mg/L	0.0027	0.0050	46%	0.000620	0.073	-	0.024	0.014	0.2	0.015	0.2	0.010	0.13	0.011	0.15	0.0010	0.01
Nickel	mg/L	0.0030	0.0050	32%	0.00109	0.083	0.50	0.005	0.004	0.05	0.005	0.06	0.003	0.04	0.005	0.06	0.00123	0.01
Selenium	mg/L	-	0.0050	2%	0.00100	0.001	-	0.018	-	-	0.0119	12	-	-	0.0093	9.31	0.0013	1.32
Silver	mg/L	-	0.0001	4%	0.000017	0.0001	-	0.0002	-	-	0.00013	1.3	-	-	0.00012	1.2	0.00002	0.21
Thallium	mg/L	-	0.0002	0%	0.00010	0.0008	-	0.001	-	-	0.00045	0.6	-	-	0.00036	0.448	0.00011	0.14
Uranium	mg/L	0.0016	0.0027	100%	0.000402	0.015	-	-	-	-	-	-	-	-	-	-	-	-
Vanadium	mg/L	-	0.0010	2%	0.00100	0.006	-	0.002	-	-	0.0017	0.3	-	-	0.0014	0.24	0.0010	0.17
Zinc	mg/L	0.0020	0.0030	25%	0.00247	0.03	0.50	0.031	0.017	0.6	0.017	0.6	0.011	0.4	0.012	0.4	0.0028	0.1
NOTES: 1. MODEL ASSUMES COMPLETE NEAR INSTANTANEOUS MIXING OF EFFLUENT AND RECEIVING WATER. 2. NO MEAN CONCENTRATION CALCULATED WHERE THE MAJORITY OF SAMPLING RESULTS WERE BELOW THE METHOD DETECTION LIMIT. 3. EFFLUENT SOURCE TERMS PROVIDED BY AMEC (JANUARY, 2012). 4. EFFLUENT SOURCE TERM OF 0.001 USED IN CALCULATIONS FOR IRON. 5. RECEIVING WATER QUALITY OBJECTIVES OBTAINED FROM CANADIAN COUNCIL OF MINISTERS OF THE ENVIRONMENT (CCME) CANADIAN WATER QUALITY GUIDELINES FOR THE PROECTION OF AQUATIC LIFE (PAL) (2003), CONTINUOUS CONCENTRATION (CHRONIC) NATIONAL RECOMMENDED WATER QUALITY CRITERIA (UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (2006)), BRITISH COLUMBIA MINISTRY OF ENVIRONMENT APPROVED AND WORKING WATER QUALITY GUIDELINES OR SUTER THRESHOLDS, AS APPLICABLE. 6. IN ORDER TO ESTIMATE EFFLUENT SOURCE TERMS, HALF THE METHOD DETECTION LIMIT OF A PARAMETER WAS ADOPTED WHERE MORE THAN HALF OF THE RESULTS FOR THAT PARAMETER WERE NON-DETECT (I.E. LESS THAN THE MDL). THESE EFFLUENT SOURCE TERMS ARE HIGHLIGHTED IN BLUE.																		

										WATER QUALITY IN THE RECEIVING WATERS									
Parameter	Units	Baseline Water Quality (L0-01, L1-02, L1-08)			Baseline Water Quality Camp Lake	Receiving Water Quality Objectives (Note 5)	Discharge Scenario		CAMP LAKE TRIB L1 BEFORE DISCHARGE TO TRIB L0				MOUTH OF TRIB L0 AT OUTLET TO CAMP LAKE				CAMP LAKE		
							Flows Used		Discharge Equalized to 10-Year Low Flow Discharge Volume = 354,060 m³/yr 10-Year Low Baseline Flows in L1 = 332,139 m³/yr				Discharge Equalized to 10-Year Low Flow - Additional Dilution in L0 Discharge Flows = 686,199 m³/yr 10-Year Low Baseline Flows in L0 (MR-10) at outlet to lake = 410,110 m³/yr				Assume Instantaneous Mixing within lake = 27,511,100 m³ Discharge Flows into Camp Lake (MR-10 Outlet Flows + Discharge Volume) = 1,096,309 m³/yr		
		Mean Concentration	90th Percentile Concentration	% Detects	Mean Concentration														Mean
							MDMER	West Waste Rock Pile Source Terms											
7. RESULTS WITH AN HQ GREATER THAN 1 ARE HIGHLIGHTED IN ORANGE, TO FOCUS DISCUSSION IN THE EFFECTS ASSESSMENT.																			

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 402 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Waste Rock and Ore Stormwater Discharge to the Mary River - Impact Statement SWSQ-11

Runoff discharged from the East Pond (Pond 2), containing both Waste Rock Stockpile runoff and pit water, has the potential to adversely affect water quality in the Mary River.

A mass balance approach similar to that used for the West Waste Rock Pond (SWSQ-10) was applied using the methodology described above to estimate water quality in the receiving waters under mean flow conditions and by discharging effluent following the natural hydrograph. Resultant water quality in the Mary River following discharge of the East Pond is presented in Table H.11, and the same analysis during the 10-year dry year is presented in Table H.12.

Residual Effects Rating

Magnitude

The mass balance modelling indicates that Level I magnitude effects to water quality will occur under both mean and low flow conditions (all indicator parameters <10x the applicable WQO) in the Mary River at each of the locations modelled:

- In the Mary River at MR-12 where tributary F0 containing the east pond discharge reports to the Mary River, under mean flow conditions (Table H.11) and the 10-year dry condition (Table H.12); and
- At the point of mixing of the discharge of stormwater from the main ore stockpiles, including the ROM stormwater discharge, under mean flow conditions (Table H.13) and the 10-year dry condition (Table H.14).

Fish habitat is present at the outlet of MR-12 (tributary F0), for which the resultant water quality in Mary River is shown on the far right of Tables H.11 and H.12. At this location, Level I water quality effects may be experienced based on an HQ >1 for mercury, selenium and silver (under mean flow conditions). Copper and chromium are added under the dry year condition. As discussed in the assessment of discharges from East Waste Rock Pond, the calculated baseline concentrations and source terms used in the modelling are from datasets where these parameters were predominantly non-detect. As such, a Level I magnitude rating is highly conservative.

Farther downstream, the ROM and main ore stockpiles will discharge into the Mary River. The resultant water quality in the Mary River considering these discharges as well as the east waste rock pond discharge discussed above is presented in Tables H.13 and H.14. Mercury, selenium and silver (under mean flow and low flow conditions), have a calculated HQ >1, suggesting a Level I magnitude effect with the same qualifiers as described above.

The resultant water quality downstream in Mary Lake was approximated considering discharges from the west stormwater pond via Camp Lake and the multiple discharges to Mary River, which also report to Mary Lake. Based on the average lake volume of 169,000,000 m³, HQs of 4, 1 and 1 were calculated for mercury,

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 403 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

selenium and silver, respectively. Given that the modelling inputs (both baseline and source terms) for each of these parameters are based on MDLs, it is anticipated that the HQ values will be below 1, achieving a negligible effect on water quality in Mary Lake.

Duration

While the temporary ore stockpiles will discharge stormwater during the Operations phase only, a Level II duration rating is assigned to this effect. The east waste rock pond and pit will continue to discharge runoff in the long term; however the post-closure effects of this is assessed separately in SWSQ-13.

Frequency

The frequency of the potential effect will be annual, limited to the period between June and September when discharge is proposed. A Level II frequency rating was assigned.

Extent

The extent of the potential effect is expected to reach negligible levels where the Mary River discharges into Mary Lake, so, given that the effect is expected to be limited to the Mine Site freshwater LSA, a Level I extent rating was assigned.

Reversibility

The potential effects associated with the discharge of mine contact water from the Waste Rock Stockpile into the Mary River system are anticipated to be partially reversible. A Level II reversibility rating was assigned.

Significance – SWSQ-11 – Waste Rock and Ore Stormwater Discharge to the Mary River

Based on these ratings, discharge of mine contact water from the Waste Rock Stockpile, ROM stockpile and Main Ore Stockpile into the Mary River is not expected to result in an adverse environmental effect on water and sediment quality in the Mine Site LSA. The residual effect is ranked as *Not Significant* (Table H.7). The Level of Confidence is High due to the quantitative and conservative nature of the assessment.

Table H.11: Predicted Water Quality in the Mary River Under Mean Flow Conditions (East Discharge)

Parameter	Units	Baseline Water Quality in Trib F0 (F0-01, F0-05)			Baseline Water Quality in Mary River (E0-01, E0-03, E0-10)			Receiving Water Quality Objectives (Note 5)	Discharge Scenario			COMBINED EFFLUENT DISCHARGE FROM THE EAST WASTE ROCK POND	WATER QUALITY IN TRIB F0 - CATCHMENT MR-12 (U/S OF FISH HABITAT)				WATER QUALITY IN MARY RIVER AT MR-12 OUTLET (FISH HABITAT)			
									Flows Used				Mean Volume of Effluent Discharged from East Pond and Open Pit = 595,116 m³/yr Mean Volume to mix at MR-12 = 4,152,146 m³/yr				Mean Volume of Effluent Discharged from Tributary, East Pond and Open Pit = 4,747,262 m³/yr Mean Volume to mix in Mary River = 78,185,678 m³/yr			
		Baseline Concentrations			Mean	Mean	HQ					90th Percentile	HQ	Mean	HQ	90th Percentile	HQ			
		MDME R	Pit Water Source Terms (Year 21)	East Waste Rock Source Terms																
pH								6.5 - 9.0	-	4.20	6.9	5.88	7.74	-	8.01	-	7.83	-	8.19	-
Hardness	mg/L CaCO ₃	84	133		58	105		-	-	-	-	-	-	-	-	-	-	-	-	-
Aluminum	mg/L	0.020	0.042	81%	0.191	0.394	100%	0.94	-	4.2	0.095	1.65	0.22	0.2	0.24	0.3	0.19	0.2	0.39	0.4
Antimony	mg/L	-	0.0004	0%	-	0.0001	2%	-	-	0.008	0.0025	0.0046	-	-	0.001	-	-	-	0.00015	-
Arsenic	mg/L	-	0.0010	4%	-	0.0010	8%	0.005	0.50	0.007	0.0020	0.0039	-	-	0.001	0.3	-	-	0.00102	0.2
Barium	mg/L	0.00945	0.01068	47%	0.01011	0.01319	57%	-	-	0.0340	0.051	0.045	0.014	-	0.015	-	0.010	-	0.013	-
Beryllium	mg/L	-	0.0050	0%	-	0.0005	0%	0.0053	-	-	-	-	-	-	-	-	-	-	-	-
Boron	mg/L	-	0.010	2%	-	0.010	6%	1.5	-	0.11	0.020	0.054	-	-	0.016	0.01	-	-	0.010	0.01
Cadmium	mg/L	-	0.0000200	0%	-	0.00002	8%	0.000029	-	0.00016	0.000016	0.00007	-	-	0.000026	0.9	-	-	0.000020	0.7
Chromium	mg/L	0.0010	0.0010	8%	0.0018	0.0020	27%	0.0047	-	0.019	0.0023	0.0086	0.0020	0.4	0.0020	0.4	0.0018	0.4	0.0020	0.4
Cobalt	mg/L	0.0002	0.0003	4%	0.0002	0.0002	20%	-	-	0.053	0.00063	0.020	0.0027	-	0.0028	-	0.00035	-	0.00035	-
Copper	mg/L	-	0.0009	38%	0.0012	0.0018	64%	0.0047	0.30	0.074	0.0025	0.030	-	-	0.0045	1.0	-	-	0.0020	0.4
Iron	mg/L	0.04	0.05	19%	0.18	0.36	86%	1.2	-	0.22	<0.002	0.084	0.045	0.04	0.054	0.05	0.17	0.1	0.34	0.3
Lead	mg/L	0.00016	0.00020	13%	0.00029	0.00087	35%	0.001	0.20	0.0022	0.00016	0.0009	0.00026	0.3	0.00029	0.3	0.00029	0.3	0.00084	0.8
Manganese	mg/L	0.00260	0.01000	32%	0.00386	0.01000	48%	-	-	0.57	0.00004	0.22	0.029	-	0.036	-	0.0053	-	0.011	-
Mercury	mg/L	-	0.00010	0%	-	0.00010	2%	0.000026	-	0.0016	0.00045	0.0009	-	-	0.00020	8	-	-	0.00011	4.1
Molybdenum	mg/L	0.00306	0.00500	38%	0.00288	0.00500	46%	0.073	-	0.027	0.0078	0.015	0.0046	0.06	0.0063	0.09	0.0030	0.04	0.0051	0.07
Nickel	mg/L	0.0032	0.0050	10%	0.0031	0.0050	92%	0.083	0.50	0.11	0.0015	0.043	0.0081	0.1	0.010	0.1	0.0034	0.04	0.0053	0.06
Selenium	mg/L	-	0.001	0%	-	0.001	0%	0.001	-	0.022	0.0051	0.011	-	-	0.0023	2.3	-	-	0.0011	1.1
Silver	mg/L	-	0.00010	4%	-	0.00010	10%	0.0001	-	0.0008	0.000051	0.00033	-	-	0.00013	1.3	-	-	0.00010	1.0
Thallium	mg/L	-	0.0001	0%	-	0.0001	0%	0.0008	-	0.0009	0.00023	0.00048	-	-	0.00015	0.185	-	-	0.00010	0.1
Uranium	mg/L	0.00213	0.00299	100%	0.00252	0.00468	98%	0.015	-	-	-	-	-	-	-	-	-	-	-	-
Vanadium	mg/L	-	0.001	0%	0.001	0.001	11%	0.006	-	0.0029	0.00083	0.0016	-	-	0.0011	0.179	-	-	0.0010	0.2
Zinc	mg/L	-	0.009	8%	0.003	0.006	25%	0.03	0.50	0.062	0.010	0.030	-	-	0.012	0.386	-	-	0.0063	0.2
NOTES: 1. MODEL ASSUMES COMPLETE NEAR INSTANTANEOUS MIXING OF EFFLUENT AND RECEIVING WATER. 2. NO MEAN CONCENTRATION CALCULATED WHERE THE MAJORITY OF SAMPLING RESULTS WERE BELOW THE METHOD DETECTION LIMIT. 3. EFFLUENT SOURCE TERMS PROVIDED BY AMEC (JANUARY, 2012). 4. EFFLUENT SOURCE TERM OF 0.001 USED IN CALCULATIONS FOR IRON. 5. RECEIVING WATER QUALITY OBJECTIVES OBTAINED FROM CANADIAN COUNCIL OF MINISTERS OF THE ENVIRONMENT (CCME) CANADIAN WATER QUALITY GUIDELINES FOR THE PROECTION OF AQUATIC LIFE (PAL) (2003), CONTINUOUS CONCENTRATION (CHRONIC) NATIONAL RECOMMENDED WATER QUALITY CRITERIA (UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (2006)), BRITISH COLUMBIA MINISTRY OF ENVIRONMENT APPROVED AND WORKING WATER QUALITY GUIDELINES OR SUTER THRESHOLDS, AS APPLICABLE. 6. IN ORDER TO ESTIMATE EFFLUENT SOURCE TERMS, HALF THE METHOD DETECTION LIMIT OF A PARAMETER WAS ADOPTED WHERE MORE THAN HALF OF THE RESULTS FOR THAT PARAMETER WERE NON-DETECT (I.E. LESS THAN THE MDL). THESE EFFLUENT SOURCE TERMS ARE HIGHLIGHTED IN BLUE. 7. RESULTS WITH AN HQ GREATER THAN 1 ARE HIGHLIGHTED IN ORANGE, TO FOCUS DISCUSSION IN THE EFFECTS ASSESSMENT.																				

Table H.12: Predicted Water Quality in the Mary River Under 10-Year Dry Conditions (East Discharge)

Parameter	Units	Baseline Quality in Trib F0 (F0-01, F0-05)			Baseline Quality in Mary River (E0-01, E0-03, E0-10)			Receiving Water Quality Objectives (Note 5)	MDMER (Mean Monthly)	Discharge Scenario		COMBINED EFFLUENT DISCHARGE FROM THE EAST WASTE ROCK POND	WATER QUALITY IN RECEIVING WATERS									
													WATER QUALITY IN TRIB F0 - CATCHMENT MR-12 (U/S OF FISH HABITAT)				WATER QUALITY IN MARY RIVER AT MR-12 OUTLET (FISH HABITAT)					
		Mean Concentration	90th Percentile Concentration	% Detects	Mean Concentration	90th Percentile Concentration	% Detects			Flows Used		10-Year Low Flow Volume of Effluent from East Pond = 244,291 m³/yr -10-Year Low Flow Volume of Effluent from Open Pit = 148,485 m³/yr	10-Year Low Flow Volume of Effluent Discharged from East Pond and Open Pit = 392,777 m³/yr 10-Year Low Flow Volume to mix at MR- 12 = 2,740,417 m³/yr	10-Year Low Flow Volume of Effluent Discharged from Tributary, East Pond and Open Pit = 3,133,194 m³/yr 10-Year Low Flow Volume to mix in Mary River = 53,166,261 m³/yr	Mean	HQ	90th Percentile	HQ	Mean	HQ	90th Percentile	HQ
										Pit Water Source Terms (Year 21)	East Waste Rock Source Terms											
pH	0	8.01	8.31		7.83	8.20		6.5 - 9.0	-	4.20	6.9	5.88	7.74	-	8.01	-	7.83	-	8.19	-		
Hardness	mg/L CaCO ₃	84	133		58	105		-	-	-	-	-	-	-	-	-	-	-	-	-		
Aluminum	mg/L	0.020	0.042	81%	0.191	0.394	100%	0.94	-	6.4	0.144	2.50	0.33	0.4	0.35	0.4	0.20	0.2	0.39	0.4		
Antimony	mg/L	-	0.0004	0%	-	0.0001	2%	-	-	0.012	0.004	0.01	-	-	0.0012	-	-	-	0.00016	-		
Arsenic	mg/L	-	0.0010	4%	-	0.0010	8%	0.005	0.50	0.011	0.003	0.006	-	-	0.002	0.3	-	-	0.001	0.2		
Barium	mg/L	0.00945	0.01068	47%	0.01011	0.01319	57%	-	-	0.0515	0.077	0.07	0.01673	-	0.018	-	0.010	-	0.013	-		
Beryllium	mg/L	-	0.0050	0%	-	0.0005	0%	0.0053	-	-	-	-	-	-	-	-	-	-	-	-		
Boron	mg/L	-	0.010	2%	-	0.010	6%	1.5	-	0.17	0.030	0.082	-	-	0.019	0.01	-	-	0.011	0.01		
Cadmium	mg/L	-	0.0000200	0%	-	0.00002	8%	0.000029	-	0.00024	0.00002	0.0001	-	-	0.00003	1.1	-	-	0.00002	0.7		
Chromium	mg/L	0.0010	0.0010	8%	0.0018	0.0020	27%	0.0047	-	0.029	0.003	0.013	0.003	0.5	0.003	0.5	0.0018	0.4	0.0020	0.4		
Cobalt	mg/L	0.0002	0.0003	4%	0.0002	0.0002	20%	-	-	0.080	0.0010	0.031	0.004	-	0.004	-	0.0004	-	0.0004	-		
Copper	mg/L	-	0.0009	38%	0.0012	0.0018	64%	0.0047	0.30	0.112	0.004	0.045	-	-	0.006	1.4	-	-	0.0021	0.4		
Iron	mg/L	0.04	0.05	19%	0.18	0.36	86%	1.2	-	0.33	0.002	0.13	0.051	0.04	0.060	0.05	0.17	0.1	0.34	0.3		
Lead	mg/L	0.00016	0.00020	13%	0.00029	0.00087	35%	0.001	0.20	0.0033	0.0002	0.001	0.0003	0.3	0.0004	0.4	0.00029	0.3	0.00084	0.8		
Manganese	mg/L	0.00260	0.01000	32%	0.00386	0.01000	48%	-	-	0.86	0.00006	0.33	0.043	-	0.050	-	0.006	-	0.01221	-		
Mercury	mg/L	-	0.00010	0%	-	0.00010	2%	0.000026	-	0.0024	0.001	0.001	-	-	0.0003	9.8	-	-	0.00011	4.2		
Molybdenum	mg/L	0.00306	0.00500	38%	0.00288	0.00500	46%	0.073	-	0.041	0.012	0.023	0.006	0.08	0.007	0.1	0.0030	0.04	0.0051	0.07		
Nickel	mg/L	0.0032	0.0050	10%	0.0031	0.0050	92%	0.083	0.50	0.17	0.002	0.064	0.011	0.1	0.012	0.1	0.004	0.04	0.0054	0.07		
Selenium	mg/L	-	0.001	0%	-	0.001	0%	0.001	-	0.033	0.008	0.02	-	-	0.003	3.1	-	-	0.0011	1.1		
Silver	mg/L	-	0.00010	4%	-	0.00010	10%	0.0001	-	0.0012	0.0001	0.001	-	-	0.0002	1.5	-	-	0.00010	1.0		
Thallium	mg/L	-	0.0001	0%	-	0.0001	0%	0.0008	-	0.0014	0.0003	0.001	-	-	0.0002	0.2	-	-	0.00010	0.1		
Uranium	mg/L	0.00213	0.00299	100%	0.00252	0.00468	98%	0.015	-	-	-	-	-	-	-	-	-	-	-	-		
Vanadium	mg/L	-	0.001	0%	0.001	0.001	11%	0.006	-	0.0044	0.001	0.002	-	-	0.001	0.2	-	-	0.0010	0.2		
Zinc	mg/L	-	0.009	8%	0.003	0.006	25%	0.03	0.50	0.094	0.015	0.045	-	-	0.014	0.5	-	-	0.0064	0.2		
NOTES 1. MODEL ASSUMES COMPLETE NEAR INSTANTANEOUS MIXING OF EFFLUENT AND RECEIVING WATER. 2. NO MEAN CONCENTRATION CALCULATED WHERE THE MAJORITY OF SAMPLING RESULTS WERE BELOW THE METHOD DETECTION LIMIT. 3. EFFLUENT SOURCE TERMS PROVIDED BY AMEC (JANUARY, 2012). 4. EFFLUENT SOURCE TERM OF 0.001 USED IN CALCULATIONS FOR IRON. 5. RECEIVING WATER QUALITY OBJECTIVES OBTAINED FROM CANADIAN COUNCIL OF MINISTERS OF THE ENVIRONMENT (CCME) CANADIAN WATER QUALITY GUIDELINES FOR THE PROECTION OF AQUATIC LIFE (PAL) (2003), CONTINUOUS CONCENTRATION (CHRONIC) NATIONAL RECOMMENDED WATER QUALITY CRITERIA (UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (2006)), BRITISH COLUMBIA MINISTRY OF ENVIRONMENT APPROVED AND WORKING WATER QUALITY GUIDELINES OR SUTER THRESHOLDS, AS APPLICABLE. 6. IN ORDER TO ESTIMATE EFFLUENT SOURCE TERMS, HALF THE METHOD DETECTION LIMIT OF A PARAMETER WAS ADOPTED WHERE MORE THAN HALF OF THE RESULTS FOR THAT PARAMETER WERE NON-DETECT (I.E. LESS THAN THE MDL). THESE EFFLUENT SOURCE TERMS ARE HIGHLIGHTED IN BLUE. 7. RESULTS WITH AN HQ GREATER THAN 1 ARE HIGHLIGHTED IN ORANGE, TO FOCUS DISCUSSION IN THE EFFECTS ASSESSMENT																						

Table H.13: Predicted Water Quality in the Mary River Under Mean Flow Conditions (All Discharges)

Parameter	Units	Baseline Quality in Mary River (E0-01, E0-03, E0-10)			Receiving Water Quality Objectives (Note 5)	MDME R	Discharge Scenario						WATER QUALITY IN MARY RIVER AFTER EAST POND DISCHARGE (FROM TABLE 7-3.18)		WATER QUALITY IN MARY RIVER AFTER ROM AND MAIN STOCKPILE DISCHARGE			
							Flows Used						Mean Volume of Effluent Discharged from Tributary, East Pond and Open Pit = 4,747,262 m³/yr Mean Volume to mix in Mary River = 78,185,678 m3/yr		Mean Volume after Discharge of Tributary, East Pond, Open Pit and Mary River Upstream of MR-12 = 82,932,940 m³/yr Mean Volume of ROM Pond = 18,203 m³/yr Mean Volume of Effluent from Main Ore Stockpiles = 143,489 m³/yr Total Ore Effluent = 161,692 m³/yr Additional Dilution in Mary River = 5,333,330 m³/yr			
		Mean Concentration	90th Percentile Concentration	% Detects			Ore Runoff (Based on Lysimeter Monitoring Results of Bulk Sample Ore Stockpile)						Mean Baseline	90th Percentile Baseline	Mean Baseline	HQ	90th Percentile Baseline	HQ
							Lump Ore Total Metals (2010-09-07)	Lump Ore Total Metals (2010-09-19)	Fine Ore Total Metals (2010-09-07)	Fine Ore Total Metals (2010-09-19)	Mean Ore Stockpile Source Terms	95th Percentile Ore Stockpile Source Terms						
pH	0	7.83	8.20		6.– - 9.0	-	5.76	5.93	6.68	6.48	6.21	6.65	7.8	8.2	7.8	-	8.2	-
Hardness	mg/L CaCO ₃	58	105		-	-												
Aluminum	mg/L	0.191	0.394	81%	0.94	-	0.127	<0.015	<0.02	<0.06	0.044	0.112	0.19	0.39	0.19	0.2	0.39	0.4
Antimony	mg/L	-	0.0001	0%	-	-	<0.0005	<0.0005	<0.002	<0.002	0.001	0.001	-	0.00015	-	-	0.00015	-
Arsenic	mg/L	-	0.0010	4%	0.005	0.50	<0.0005	<0.0005	<0.002	<0.002	0.001	0.001	-	0.0010	-	-	0.0010	0.2
Barium	mg/L	0.01011	0.01319	47%	-	-	0.0236	0.0251	0.0213	0.0115	0.020	0.025	0.010	0.013	0.010	-	0.013	-
Beryllium	mg/L	-	0.0005	0%	0.0053	-	<0.0025	<0.0025	<0.01	<0.01	0.003	0.005	-	-	-	-	-	-
Boron	mg/L	-	0.010	2%	1.5	-	0.16	0.16	0.21	0.31	0.210	0.295	-	0.010	-	-	0.011	0.007
Cadmium	mg/L	0.00003	0.00010	0%	0.000029	-	0.000203	0.000198	<0.0002	0.00057	0.00027	0.00051	-	0.00002	-	-	0.00003	0.9
Chromium	mg/L	0.0018	0.0020	8%	0.0047	-	<0.0025	<0.0025	<0.01	<0.01	0.003	0.0050	0.0018	0.0020	0.0018	0.4	0.0020	0.4
Cobalt	mg/L	0.0002	0.0002	4%	-	-	0.09740	0.1080	0.0462	0.1400	0.098	0.1352	0.0003	0.0004	0.00058	-	0.00059	-
Copper	mg/L	0.0012	0.0018	38%	0.0047	0.30	0.00183	<0.0025	<0.002	<0.01	0.002	0.0045	-	0.0020	-	-	0.0019	0.4
Iron	mg/L	0.18	0.36	19%	1.2	-	0.825	0.031	0.041	0.082	0.24	0.714	0.17	0.34	0.17	0.1	0.34	0.3
Lead	mg/L	0.00029	0.00087	13%	0.001	0.20	<0.0003	0.001	<0.001	<0.001	0.0005	0.0009	0.00029	0.00084	0.00029	0.3	0.00084	0.8
Manganese	mg/L	0.00386	0.01000	32%	-	-	18.4	21.5	65.5	112	54.4	105.0	0.005	0.01147	0.197	-	0.203	-
Mercury	mg/L	-	0.00010	0%	0.000026	-	<0.00001	0.00004	<0.00001	<0.00001	0.00001	0.00003	-	0.00011	-	-	0.00011	4.0
Molybdenum	mg/L	0.00288	0.00500	38%	0.073	-	<0.00025	<0.00025	<0.001	0.0012	0.0005	0.001	0.0030	0.0051	0.0030	0.04	0.0051	0.1
Nickel	mg/L	0.0031	0.0050	10%	0.083	0.50	0.0977	0.107	0.035	0.113	0.088	0.112	0.0034	0.0053	0.0036	0.04	0.005	0.1
Selenium	mg/L	-	0.001	0%	0.001	-	<0.005	0.0051	<0.02	<0.02	0.007	0.010	-	0.0011	-	-	0.0011	1.1
Silver	mg/L	-	0.00010	4%	0.0001	-	<0.00005	<0.00005	<0.0002	<0.0002	0.00006	0.00010	-	0.00010	-	-	0.00010	1.0
Thallium	mg/L	-	0.0001	0%	0.0008	-	<0.0005	<0.0005	<0.002	<0.002	0.001	0.001	-	0.00010	-	-	0.00010	0.1
Uranium	mg/L	0.00252	0.00468	100%	0.015	-	0.00010	<0.00005	<0.0002	<0.0002	0.00008	0.00010	-	-	-	-	-	-
Vanadium	mg/L	0.001	0.001	0%	0.006	-	<0.005	<0.005	<0.02	<0.02	0.006	0.010	-	0.0010	-	-	0.0010	0.2
Zinc	mg/L	0.003	0.006	8%	0.03	0.50	<0.005	<0.015	<0.02	<0.06	0.013	0.027	-	0.0063	-	-	0.0063	0.2
NOTES 1. MODEL ASSUMES COMPLETE NEAR INSTANTANEOUS MIXING OF EFFLUENT AND RECEIVING WATER 2. NO MEAN CONCENTRATION CALCULATED WHERE THE MAJORITY OF SAMPLING RESULTS WERE BELOW THE METHOD DETECTION LIMIT 3. EFFLUENT SOURCE TERMS PROVIDED BY AMEC (JANUARY, 2012). 4. EFFLUENT SOURCE TERM OF 0.001 USED IN CALCULATIONS FOR IRON. 5. RECEIVING WATER QUALITY OBJECTIVES OBTAINED FROM CANADIAN COUNCIL OF MINISTERS OF THE ENVIRONMENT (CCME) CANADIAN WATER QUALITY GUIDELINES FOR THE PROECTION OF AQUATIC LIFE (PAL) (2003), CONTINUOUS CONCENTRATION (CHRONIC) NATIONAL RECOMMENDED WATER QUALITY CRITERIA (UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (2006)), BRITISH COLUMBIA MINISTRY OF ENVIRONMENT APPROVED AND WORKING WATER QUALITY GUIDELINES OR SUTER THRESHOLDS, AS APPLICABLE. IN ORDER TO ESTIMATE EFFLUENT SOURCE TERMS, HALF THE METHOD DETECTION LIMIT OF A PARAMETER WAS ADOPTED WHERE MORE THAN HALF OF THE RESULTS FOR THAT PARAMETER WERE NON 6. DETECT (I.E. LESS THAN THE MDL). THESE EFFLUENT SOURCE TERMS ARE HIGHLIGHTED IN BLUE																		

Parameter	Units	Baseline Quality in Mary River (E0-01, E0-03, E0-10)			Receiving Water Quality Objectives (Note 5)	MDME R	Discharge Scenario						WATER QUALITY IN MARY RIVER AFTER EAST POND DISCHARGE (FROM TABLE 7-3.18)		WATER QUALITY IN MARY RIVER AFTER ROM AND MAIN STOCKPILE DISCHARGE			
							Flows Used						Mean Volume of Effluent Discharged from Tributary, East Pond and Open Pit = 4,747,262 m³/yr Mean Volume to mix in Mary River = 78,185,678 m3/yr		Mean Volume after Discharge of Tributary, East Pond, Open Pit and Mary River Upstream of MR-12 = 82,932,940 m³/yr Mean Volume of ROM Pond = 18,203 m³/yr Mean Volume of Effluent from Main Ore Stockpiles = 143,489 m³/yr Total Ore Effluent = 161,692 m³/yr Additional Dilution in Mary River = 5,333,330 m³/yr			
		Mean Concentration	90th Percentile Concentration	% Detects			Ore Runoff (Based on Lysimeter Monitoring Results of Bulk Sample Ore Stockpile)						Mean Baseline	90th Percentile Baseline	Mean Baseline	HQ	90th Percentile Baseline	HQ
							Lump Ore Total Metals (2010-09-07)	Lump Ore Total Metals (2010-09-19)	Fine Ore Total Metals (2010-09-07)	Fine Ore Total Metals (2010-09-19)	Mean Ore Stockpile Source Terms	95th Percentile Ore Stockpile Source Terms						
7. RESULTS WITH AN HQ GREATER THAN 1 ARE HIGHLIGHTED IN ORANGE, TO FOCUS DISCUSSION IN THE EFFECTS ASSESSMENT																		

Table H.14: Predicted Water Quality in the Mary River Under 10-Year Dry Conditions (All Discharges)

Parameter	Units	Baseline Quality in Mary River (E0-01, E0-03, E0-10)			Receiving Water Quality Objectives (Note 5)	MDMER	Discharge Scenario						WATER QUALITY IN MARY RIVER AFTER EAST POND DISCHARGE (TABLE 7-3.19)		WATER QUALITY IN MARY RIVER AFTER ROM AND MAIN STOCKPILE DISCHARGE			
							Flows Used						10-Year Low Flow Volume of Effluent Discharged from Tributary, East Pond and Open Pit = 3,133,194 m3/yr 10-Year Low Flow Volume to mix in Mary River = 53,166,261 m3/yr		10-Year Low Flow Volume after Discharge of Tributary, East Pond, Open Pit and Mary River Upstream of MR-12 = 56,299,454 m³/yr 10-Year Low Flow Volume of ROM Pond = 12,378 m³/yr 10-Year Low Flow Volume of Effluent from Main Ore Stockpiles = 97,573 m³/yr Total Ore Effluent = 109,951 m³/yr Additional Dilution in Mary River = 3,626,664 m³/yr			
		Mean Concentration	90th Percentile Concentration	% Detects			Ore Runoff (Based on Lysimeter Monitoring Results of Bulk Sample Ore Stockpile)						Mean Baseline	90th Percentile Baseline	Mean Baseline	HQ	90th Percentile Baseline	HQ
							Lump Ore Total Metals (2010-09-07)	Lump Ore Total Metals (2010-09-19)	Fine Ore Total Metals (2010-09-07)	Fine Ore Total Metals (2010-09-19)	95th Percentile Ore Stockpile For Mean Flows Source Terms	Ore Stockpile Source Terms (Dry Year)						
pH	0	7.83	8.20		6.-- 9.0	-	5.76	5.93	6.68	6.48	6.65	6.65	7.83	8.01	7.82	-	8.0	-
Hardness	mg/L CaCO ₃	58	105		-	-												
Aluminum	mg/L	0.191	0.394	81%	0.94	-	0.127	<0.015	<0.02	<0.06	0.112	0.170	0.20	0.39	0.20	0.2	0.39	0.4
Antimony	mg/L	-	0.0001	0%	-	-	<0.0005	<0.0005	<0.002	<0.002	0.001	0.002	-	0.000162	-	-	0.00016	-
Arsenic	mg/L	-	0.0010	4%	0.005	0.50	<0.0005	<0.0005	<0.002	<0.002	0.001	0.002	-	0.00103	-	-	0.00103	0.2
Barium	mg/L	0.01011	0.01319	47%	-	-	0.0236	0.0251	0.0213	0.0115	0.025	0.038	0.010	0.013	0.011	-	0.013	-
Beryllium	mg/L	-	0.0005	0%	0.0053	-	<0.0025	<0.0025	<0.01	<0.01	0.005	0.008	-	-	-	-	-	-
Boron	mg/L	-	0.010	2%	1.5	-	0.16	0.16	0.21	0.31	0.295	0.447	-	0.011	-	-	0.011	0.008
Cadmium	mg/L	0.00003	0.00010	0%	0.000029	-	0.000203	0.000198	<0.0002	0.00057	0.00051	0.00078	-	0.000021	-	-	0.000027	0.9
Chromium	mg/L	0.0018	0.0020	8%	0.0047	-	<0.0025	<0.0025	<0.01	<0.01	0.0050	0.008	0.0018	0.0020	0.0018	0.4	0.0020	0.4
Cobalt	mg/L	0.0002	0.0002	4%	-	-	0.09740	0.1080	0.0462	0.1400	0.1352	0.205	0.0004	0.0004	0.0008	-	0.0008	-

Parameter	Units	Baseline Quality in Mary River (E0-01, E0-03, E0-10)			Receiving Water Quality Objectives (Note 5)	MDMER	Discharge Scenario						WATER QUALITY IN MARY RIVER AFTER EAST POND DISCHARGE (TABLE 7-3.19)		WATER QUALITY IN MARY RIVER AFTER ROM AND MAIN STOCKPILE DISCHARGE			
							Flows Used						10-Year Low Flow Volume of Effluent Discharged from Tributary, East Pond and Open Pit = 3,133,194 m3/yr 10-Year Low Flow Volume to mix in Mary River = 53,166,261 m3/yr		10-Year Low Flow Volume after Discharge of Tributary, East Pond, Open Pit and Mary River Upstream of MR-12 = 56,299,454 m³/yr 10-Year Low Flow Volume of ROM Pond = 12,378 m³/yr 10-Year Low Flow Volume of Effluent from Main Ore Stockpiles = 97,573 m³/yr Total Ore Effluent = 109,951 m³/yr Additional Dilution in Mary River = 3,626,664 m³/yr			
		Mean Concentration	90th Percentile Concentration	% Detects									Mean Baseline	90th Percentile Baseline	Mean Baseline	HQ	90th Percentile Baseline	HQ
							Lump Ore Total Metals (2010-09-07)	Lump Ore Total Metals (2010-09-19)	Fine Ore Total Metals (2010-09-07)	Fine Ore Total Metals (2010-09-19)	95th Percentile Ore Stockpile For Mean Flows Source Terms	Ore Stockpile Source Terms (Dry Year)						
Copper	mg/L	0.0012	0.0018	38%	0.0047	0.30	0.00183	<0.0025	<0.002	<0.01	0.0045	0.007	-	0.0021	-	-	0.0020	0.4
Iron	mg/L	0.18	0.36	19%	1.2	-	0.825	0.031	0.041	0.082	0.714	1.08	0.17	0.34	0.17	0.1	0.35	0.3
Lead	mg/L	0.00029	0.00087	13%	0.001	0.20	<0.0003	0.001	<0.001	<0.001	0.0009	0.001	0.00029	0.00084	0.0003	0.3	0.00084	0.8
Manganese	mg/L	0.00386	0.01000	32%	-	-	18.4	21.5	65.5	112	105.0	159.1	0.006	0.012	0.30	-	0.30	-
Mercury	mg/L	-	0.00010	0%	0.000026	-	<0.00001	0.00004	<0.00001	<0.00001	0.00003	0.00005	-	0.00011	-	-	0.00011	4.2
Molybdenum	mg/L	0.00288	0.00500	38%	0.073	-	<0.00025	<0.00025	<0.001	0.0012	0.001	0.0017	0.0030	0.0051	0.0030	0.04	0.0051	0.1
Nickel	mg/L	0.0031	0.0050	10%	0.083	0.50	0.0977	0.107	0.035	0.113	0.112	0.170	0.004	0.0054	0.0038	0.05	0.0057	0.1
Selenium	mg/L	-	0.001	0%	0.001	-	<0.005	0.0051	<0.02	<0.02	0.010	0.015	-	0.0011	-	-	0.0011	1.1
Silver	mg/L	-	0.00010	4%	0.0001	-	<0.00005	<0.00005	<0.0002	<0.0002	0.0001	0.0002	-	0.00010	-	-	0.00010	1.0
Thallium	mg/L	-	0.0001	0%	0.0008	-	<0.0005	<0.0005	<0.002	<0.002	0.001	0.002	-	0.00010	-	-	0.00011	0.1
Uranium	mg/L	0.00252	0.00468	100%	0.015	-	0.00010	<0.00005	<0.0002	<0.0002	0.0001	0.0002	-	-	-	-	-	-
Vanadium	mg/L	0.001	0.001	0%	0.006	-	<0.005	<0.005	<0.02	<0.02	0.010	0.015	-	0.0010	-	-	0.0010	0.2
Zinc	mg/L	0.003	0.006	8%	0.03	0.50	<0.005	<0.015	<0.02	<0.06	0.027	0.041	-	0.0064	-	-	0.0065	0.2
NOTES: 1. MODEL ASSUMES COMPLETE NEAR INSTANTANEOUS MIXING OF EFFLUENT AND RECEIVING WATER. 2. NO MEAN CONCENTRATION CALCULATED WHERE THE MAJORITY OF SAMPLING RESULTS WERE BELOW THE METHOD DETECTION LIMIT. 3. EFFLUENT SOURCE TERMS PROVIDED BY AMEC (JANUARY, 2012). 4. EFFLUENT SOURCE TERM OF 0.001 USED IN CALCULATIONS FOR IRON. 5. RECEIVING WATER QUALITY OBJECTIVES OBTAINED FROM CANADIAN COUNCIL OF MINISTERS OF THE ENVIRONMENT (CCME) CANADIAN WATER QUALITY GUIDELINES FOR THE PROECTION OF AQUATIC LIFE (PAL) (2003), CONTINUOUS CONCENTRATION (CHRONIC) NATIONAL RECOMMENDED WATER QUALITY CRITERIA (UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (2006)), BRITISH COLUMBIA MINISTRY OF ENVIRONMENT APPROVED AND WORKING WATER QUALITY GUIDELINES OR SUTER THRESHOLDS, AS APPLICABLE. 6. IN ORDER TO ESTIMATE EFFLUENT SOURCE TERMS, HALF THE METHOD DETECTION LIMIT OF A PARAMETER WAS ADOPTED WHERE MORE THAN HALF OF THE RESULTS FOR THAT PARAMETER WERE NON-DETECT (I.E. LESS THAN THE MDL). THESE EFFLUENT SOURCE TERMS ARE HIGHLIGHTED IN BLUE.																		

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 409 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Pit Lake Water and Waste Rock Discharges to Mary River in Post-Closure – Impact Statement SWSQ-13

At the end of mining, the open pit will gradually fill with water from precipitation; time is estimated at 85 to 147 years, depending on annual precipitation, evaporation and other factors (Knight Piésold, 2008).

During the years that the pit is filling, runoff will continue to discharge to tributary F0 and the Mary River from the East Waste Rock Pond.

AMEC (2012b) developed water quality estimates for pit water for the final year of mining (Year 21), which were applied in a water quality model under the assumption that, once the pit has filled, in each subsequent (post-Closure) year all precipitation into the open pit will accumulate and spill over the southern edge facing the Mary River, behaving like a spillway, and that water will be released during the open water period according to the natural hydrograph.

Based on pit water quality for Year 21 of mining, it is possible the water will have a pH of around 4.2, which is outside of the pH range of the MDMR (6.0 to 9.0). Adjustment of pH will be carried out periodically through post-closure using either batch lime treatment or in-line treatment, drawing down the pit lake periodically. As mentioned in above, the mass loading modelling carried out is based on conservative assumptions and Baffinland is continuing to study the geochemistry of waste rock and ore to further refine predictions, management plans, and post-closure strategies.

Residual Effects Ratings

Magnitude

The estimated water quality in the Mary River from pit water and waste rock stormwater discharges, assuming no treatment to adjust pH of pit water, is presented in Table H.15. The mass balance modelling indicates that Level I magnitude effects to water quality will occur under low flow conditions, with a calculated HQ between 1 and 10 for mercury, selenium and silver. It is noted that an HQ >10 was calculated for mercury within the F0 tributary, upstream of fish; however, since the assessment of water and sediment quality is based on fish as the receptor, the effects assessment considers the resultant water quality at fish habitat within the Mary River, where all parameters have an HQ value less than 10.

Duration

The effects associated with the discharge of pit water and waste rock runoff into the Mary River are permanent; Level III duration. The waste rock seepage will run off into the Mary River starting in the first year post-closure, whereas the pit water is not expected to discharge to the Mary River until the pit fills, after 80 years or more.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 410 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Frequency

The frequency of the potential effect will be annual, limited to the period between June and September when discharge is proposed. A Level II frequency rating was assigned.

Extent

The extent of the potential effect is likely to be limited to the Mine Site freshwater LSA; a Level I extent rating was assigned.

Reversibility

The effects associated with the discharge of pit water and waste rock runoff into the Mary River is partially reversible. A Level II reversibility rating was assigned.

Significance – SWSQ-13 – Pit Lake Water and Waste Rock Discharges to Mary River in Post-Closure

Based on these ratings, discharge of pit water and stormwater from the East Waste Rock Sedimentation Pond into the Mary River is not expected to result in an adverse environmental effect on water and sediment quality in the Mine Site LSA. The residual effect is ranked as *Not Significant* (Table H.7). The Level of Confidence (Table H.8) is Medium, due to the assumptions made in the mass loading models and the consequently highly conservative nature of the effect prediction.

Table H.15: Predicted Water Quality in the Mary River During Post-Closure Due to Discharges of Pit Water and Waste Rock Stormwater Under 10-Year Low Flow Conditions

										COMBINED EFFLUENT			WATER QUALITY IN RECEIVING WATERS								
Parameter	Units	Baseline Quality in Trib F0 (F0-01, F0-05)			Baseline Quality in Mary River (E0-01, E0-03, E0-10)			Receiving Water Quality Objectives (Note 5)	MDMER (Mean Monthly)	Discharge Scenario			DISCHARGE FROM THE EAST WASTE ROCK POND	WATER QUALITY IN TRIB MR-12 (U/S OF FISH HABITAT)				WATER QUALITY IN MARY RIVER AT MR-12 (FISH HABITAT)			
										Flows Used			10-Year Low Flow Volume of Effluent from East Pond = 244,291 m³/yr 10-Year Low Flow Volume of Effluent from Open Pit = 296,971 m³/yr	10-Year Low Flow Volume of Effluent Discharged from East Pond and Open Pit = 541,262 m³/yr 10-Year Low Flow Volume to mix at MR-12 = 2,740,417 m³/yr				10-Year Low Flow Volume of Effluent Discharged from Tributary, East Pond & Open Pit = 3,281,679 m³/yr 10-Year Low Flow Volume to mix in Mary River = 53,166,261 m³/yr			
		Baseline Concentrations			Mean	Mean	HQ						90th Percentile	HQ	Mean	HQ	90th Percentile	HQ			
										Pit Water Source Terms (Year 21)	East Waste Rock Source Term (Mean Flows)	East Waste Rock Source Terms (Dry Year)									
pH	0	8.01	8.31		7.83	8.20		6.5 - 9.0	-	4.20	6.9	6.9	5.42	7.58	-	7.83	-	7.82	-	8.18	-
Hardness	mg/L CaCO₃	84	133		58	105		-	-	-	-	-	-	-	-	-	-	-	-	-	-
Chloride	mg/L	5.7	18.6		8.3	17.0		120	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Suspended Solids	mg/L	-	2		3	6		15	15.00	-	-	-	-	-	-	-	-	-	-	-	-
Total Alkalinity	mg/L CaCO₃	74	108		47	81		-	-	-	-	-	-	-	-	-	-	-	-	-	-
Ammonia	mg/L	0.06	0.11		0.05	0.07		-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nitrate	mg/L	0.1	0.1		-	0.1		13	-	-	-	-	-	-	-	-	-	-	-	-	-
Nitrite	mg/L	0.011	0.017		0.010	0.014		0.06	-	-	-	-	-	-	-	-	-	-	-	-	-
Sulphate	mg/L	2	4		3	5		-	-	239	26	39	149	26	-	28	-	4	-	6	-
Total Phosphorous	mg/L	0.013	0.030		0.013	0.026		-	-	-	-	-	-	-	-	-	-	-	-	-	-
Aluminum	mg/L	0.020	0.042	81%	0.191	0.394	100%	0.94	-	6.4	0.095	0.144	3.56	0.60	0.6	0.62	0.7	0.21	0.229	0.41	0.4
Antimony	mg/L	-	0.0004	0%	-	0.0001	2%	-	-	0.012	0.003	0.004	0.01	-	-	0.0017	-	-	-	0.00019	-
Arsenic	mg/L	-	0.0010	4%	-	0.0010	8%	0.005	0.50	0.011	0.002	0.003	0.007	-	-	0.0020	0.4	-	-	0.00106	0.2
Barium	mg/L	0.00945	0.01068	47%	0.01011	0.01319	57%	-	-	0.0515	0.051	0.077	0.06	0.01831	-	0.019	-	0.011	-	0.014	-
Beryllium	mg/L	-	0.0050	0%	-	0.0005	0%	0.0053	-	-	-	-	-	-	-	-	-	-	-	-	-
Boron	mg/L	-	0.010	2%	-	0.010	6%	1.5	-	0.17	0.020	0.030	0.105	-	-	0.026	0.02	-	-	0.011	0.01
Cadmium	mg/L	-	0.0000200	0%	-	0.00002	8%	0.000029	-	0.00024	0.00002	0.00002	0.0001	-	-	0.000040	1.4	-	-	0.000021	0.7
Chromium	mg/L	0.0010	0.0010	8%	0.0018	0.0020	27%	0.0047	-	0.029	0.002	0.003	0.017	0.004	0.8	0.0037	0.8	0.0019	0.406	0.0021	0.4
Cobalt	mg/L	0.0002	0.0003	4%	0.0002	0.0002	20%	-	-	0.080	0.0006	0.0010	0.044	0.008	-	0.0076	-	0.0006	-	0.00063	-
Copper	mg/L	-	0.0009	38%	0.0012	0.0018	64%	0.0047	0.30	0.112	0.003	0.004	0.063	-	-	0.011	2.4	-	-	0.0023	0.5
Iron	mg/L	0.04	0.05	19%	0.18	0.36	86%	1.2	-	0.33	0.001	0.002	0.18	0.064	0.1	0.072	0.06	0.17	0.144	0.34	0.3
Lead	mg/L	0.00016	0.00020	13%	0.00029	0.00087	35%	0.001	0.20	0.0033	0.0002	0.0002	0.002	0.0005	0.5	0.00049	0.5	0.00030	0.299	0.00085	0.8
Manganese	mg/L	0.00260	0.01000	32%	0.00386	0.01000	48%	-	-	0.86	0.00004	0.00006	0.47	0.080	-	0.087	-	0.008	-	0.01445	-
Mercury	mg/L	-	0.00010	0%	-	0.00010	2%	0.000026	-	0.0024	0.00045	0.00068	0.002	-	-	0.00035	13.6	-	-	0.00011	4.4
Molybdenum	mg/L	0.00306	0.00500	38%	0.00288	0.00500	46%	0.073	-	0.041	0.008	0.012	0.028	0.007	0.1	0.0088	0.12	0.0031	0.043	0.0052	0.07
Nickel	mg/L	0.0032	0.0050	10%	0.0031	0.0050	92%	0.083	0.50	0.17	0.002	0.002	0.092	0.018	0.2	0.019	0.2	0.004	0.048	0.0058	0.07
Selenium	mg/L	-	0.001	0%	-	0.001	0%	0.001	-	0.033	0.005	0.008	0.02	-	-	0.0044	4.4	-	-	0.0012	1.2

										COMBINED EFFLUENT DISCHARGE FROM THE EAST WASTE ROCK POND			WATER QUALITY IN RECEIVING WATERS									
Parameter	Units	Baseline Quality in Trib F0 (F0-01, F0-05)			Baseline Quality in Mary River (E0-01, E0-03, E0-10)			Receiving Water Quality Objectives (Note 5)	MDMER (Mean Monthly)	Discharge Scenario			WATER QUALITY IN TRIB MR-12 (U/S OF FISH HABITAT)				WATER QUALITY IN MARY RIVER AT MR-12 (FISH HABITAT)					
										Flows Used			10-Year Low Flow Volume of Effluent from East Pond = 244,291 m³/yr 10-Year Low Flow Volume of Effluent from Open Pit = 296,971 m³/yr				10-Year Low Flow Volume of Effluent Discharged from East Pond and Open Pit = 541,262 m³/yr 10-Year Low Flow Volume to mix at MR-12 = 2,740,417 m³/yr				10-Year Low Flow Volume of Effluent Discharged from Tributary, East Pond & Open Pit = 3,281,679 m³/yr 10-Year Low Flow Volume to mix in Mary River = 53,166,261 m³/yr	
		Baseline Concentrations			Mean	Mean	HQ						90th Percentile	HQ	Mean	HQ	90th Percentile	HQ				
		Mean Concentration	90th Percentile Concentration	% Detects	Mean Concentration	90th Percentile Concentration	% Detects			Pit Water Source Terms (Year 21)	East Waste Rock Source Term (Mean Flows)	East Waste Rock Source Terms (Dry Year)										
Silver	mg/L	-	0.00010	4%	-	0.00010	10%	0.0001	-	0.0012	0.0001	0.0001	0.001	-	-	0.00020	2.0	-	-	0.00011	1.1	
Thallium	mg/L	-	0.0001	0%	-	0.0001	0%	0.0008	-	0.0014	0.0002	0.0003	0.001	-	-	0.00023	0.3	-	-	0.00011	0.1	
Uranium	mg/L	0.00213	0.00299	100%	0.00252	0.00468	98%	0.015	-	-	-	-	-	-	-	-	-	-	-	-	-	
Vanadium	mg/L	-	0.001	0%	0.001	0.001	11%	0.006	-	0.0044	0.001	0.001	0.003	-	-	0.0013	0.2	-	-	0.0010	0.2	
Zinc	mg/L	-	0.009	8%	0.003	0.006	25%	0.03	0.50	0.094	0.010	0.015	0.058	-	-	0.017	0.6	-	-	0.0066	0.2	
NOTES: 1. MODEL ASSUMES COMPLETE NEAR INSTANTANEOUS MIXING OF EFFLUENT AND RECEIVING WATER. 2. NO MEAN CONCENTRATION CALCULATED WHERE THE MAJORITY OF SAMPLING RESULTS WERE BELOW THE METHOD DETECTION LIMIT. 3. EFFLUENT SOURCE TERMS PROVIDED BY AMEC (JANUARY, 2012). 4. EFFLUENT SOURCE TERM OF 0.001 USED IN CALCULATIONS FOR IRON. 5. RECEIVING WATER QUALITY OBJECTIVES OBTAINED FROM CANADIAN COUNCIL OF MINISTERS OF THE ENVIRONMENT (CCME) CANADIAN WATER QUALITY GUIDELINES FOR THE PROECTION OF AQUATIC LIFE (PAL) (2003), CONTINUOUS CONCENTRATION (CHRONIC) NATIONAL RECOMMENDED WATER QUALITY CRITERIA (UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (2006)), BRITISH COLUMBIA MINISTRY OF ENVIRONMENT APPROVED AND WORKING WATER QUALITY GUIDELINES OR SUTER THRESHOLDS, AS APPLICABLE. 6. IN ORDER TO ESTIMATE EFFLUENT SOURCE TERMS, HALF THE METHOD DETECTION LIMIT OF A PARAMETER WAS ADOPTED WHERE MORE THAN HALF OF THE RESULTS FOR THAT PARAMETER WERE NON-DETECT (I.E. LESS THAN THE MDL). THESE EFFLUENT SOURCE TERMS ARE HIGHLIGHTED IN BLUE. 7. RESULTS WITH AN HQ GREATER THAN 1 ARE HIGHLIGHTED IN ORANGE, TO FOCUS DISCUSSION IN THE EFFECTS ASSESSMENT.																						

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 413 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

References

1. AMEC 2012c. Interim Mine Rock ML/ARD Report, Mary River Project, January 2012.
2. AMEC. 2012a. Interim Waste Rock Stockpile Seepage Quality Model Report, Mary River Project. January 2012.
3. AMEC. 2012b. Interim Open Pit Water Quality Model Technical Memorandum, Mary River Project. January 2012.

	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 414 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Appendix I

Phase 2 Marginal Closure and Reclamation Financial Security Estimate

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	Interim Closure and Reclamation Plan	Issue Date: April 2021 Revision: For review purposes only	Page 415 of 455
	Sustainable Development	Document #: BAF-PH1-830-P16-0012	

Insert PDF attachment 40 pages