



EARLY REVENUE PHASE

**ADDENDUM TO
FINAL ENVIRONMENTAL IMPACT STATEMENT**

**VOLUME 10
ENVIRONMENTAL, HEALTH AND SAFETY
MANAGEMENT**

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14.1 INTRODUCTION (CHANGE)

Baffinland Iron Mines Corporation (Baffinland) presented an overview of its Environmental Management System (EMS) in Volume 10 of the Final Environmental Impact Assessment for the Mary River Project. Baffinland's EHS system defines the sequence of "**Policy – Planning – Implementation and Operation – Checking and Corrective Actions – Management Review Process**" that must be in place to ensure that the Mary River Project is executed in an environmentally and socially acceptable manner and in a spirit of **continuous improvement** employing adaptive management principles.

The EHS system and its associated management plans are "**Life of Project**" Management Plans. They apply from the onset of the Exploration Phase, through pre-development activities, Construction, Operations and Closure Phases. The application of the continuous improvement principle and adaptive management (**Policy – Planning - Checking and Corrective Actions – Management Review Process**) ensures that the environmental management plans are appropriate for the level of activities on site at all times. Adaptive management is the application of mitigation measures when review processes identify potential adverse effects. The application of adaptive management measures could require the approval of a regulatory authority.

These management plans are the tools used by Baffinland to ensure that the Company's objectives and environmental commitment are achieved. The Company acknowledges that the Management Plans will require updating on a regular basis to ensure they capture/incorporate the requirements outlined in the terms and conditions of the Project Certificate, the pending Type A Water Licence, and the pending Qikiqtani Inuit Association IOL Lease, as well as other commitments made to local communities and regulatory agencies.

Key elements of these plans are execution and line of accountability within the Company's organization to ensure that the objectives are met. As the Project advances through its phases of development, the on-site organizational structure of the site management team will change with time. However, the fundamental commitments made by the Company as embodied in the management plans will remain. Furthermore, the process of continual improvement (review and adaptive management) may also introduce occasional changes. In essence, the management plans are tools designed to manage change while ensuring that the Company's objectives and environmental commitments are achieved.

Baffinland does not expect the core content of these management plans to change significantly over the life of the Project. However, certain sections of each plan will be updated regularly:

- Changes in regulations affecting the Project;
- Roles and Responsibilities - will adapt to the evolving organizational structure on-site and off-site;
- Monitoring requirements, objectives and thresholds will be adapted on the basis of annual review of monitoring information collected in previous time period (adaptive management); and
- Changes in reporting requirements as directed by the licensing authority.

The list of Management Plans that were presented in the Final Environmental Impact Statement (FEIS) are presented in Table 10-14.1. The table also suggests the timing for the next revision or update of each specific management plan, the management plans submitted to the Nunavut Water Board (NWB) in

support of Type A Water Licence, management plans reviewed by Transport Canada, and those management plans approved by NRCan. Additionally, for the reviewers convenience, management plans highlighted in the table below are included as hard copies in this Addendum to the FEIS. Lastly, for the reviewers convenience, the most recent version is provided in electronic format with this Addendum to the FEIS.

Table 10-14.1 List of Management Plans (Change)

Standard, Plan and Identification Number	Previous Revision Date	Revision Date	Expected Implementation	Comments
EHS Framework Standard ^{1, 5}	DEIS December 2010	As required	In Effect	Updates as required
Hazard Identification and Risk Assessment Procedure ^{1, 5}	DEIS December 2010	As required	In Effect	Updates as required
Environmental Protection Plan ^{1, 4, 5} (now Construction Environmental Protection Plan)	FEIS February 2012	April 2013	In Effect	All EPP procedures have been reviewed and combined into a Construction Environmental Protection Plan (CEPP). Some procedures will be updated throughout 2013 as Contractor begin work on site. The current CEPP is presented as Appendix 10B to FEIS Addendum Volume 10
Emergency Response and Spill Contingency Plan ^{1, 2, 5}	FEIS February 2012	March 2013	March 31, 2013	This plan is updated annually to reflect site conditions and constraints. Baffinland will discuss content of the plan with the Emergency Response Work Group (TC, GN). Current Type B Licence version and March 31 update of this management plan remains in effect until the update is submitted to the NWB for the pending Type A Water Licence
Oil Pollution Emergency Plan – Milne Port (OPEP) ^{2, 5}	FEIS February 2012	July 2013	July 2013	This plan is updated annually and submitted to Transport Canada for review
Explosives Management Plan ^{3, 5}	FEIS February 2012	June 2013	May 2013	The NRCan permit to store and use explosives will be granted to the Explosives Contractor
Blasting Management Plan ^{1, 5}	First Draft submitted March 31, 2013	May 2013	May 2013	Individual blasting management plan are provided with each quarry management plan (Q1 at Milne Port and QMR2 at the Mine Site)
Air Quality and Noise Abatement Management Plan ^{4, 5}	April 2013 (PC Term and Condition # 7)	May 2013	May 2013	As per the condition of the Project Certificate, an update has been submitted to the NIRB. The current AQNAMP is presented as Appendix 10D-1
Surface Water, Aquatic Ecosystems, Fish and Fish Habitat Management Plan ^{1, 5}	FEIS February 2012	March 2013	March 31, 2013	Current Type B Water Licence version and March 31 update of this management plan remains in effect until the update is submitted to the NWB for the Type A Water Licence

Table 10-14.1 List of Management Plans (Change) (Cont'd)

Standard, Plan and Identification Number	Previous Revision Date	Revision Date	Expected Implementation	Comments
Hazardous Materials and Hazardous Waste Management Plan	February 2012	May 2013		Plan will be updated following the issuance of the pending Type A Water Licence
Waste Water Management Plan ^{1, 5}	FEIS February 2012	March 2013	May 2013	Current Type B Licence version and March 31 update of this management plan remains in effect until the update is submitted to the NWB for the pending Type A Water Licence
Waste Management Plan ^{1, 5}	FEIS February 2012	April 2013	May 2013	Current Type B Water Licence version and March 31 update of this management plan remains in effect until the update is submitted to the NWB for the pending Type A Water Licence
Waste Rock Management Plan ^{1, 5}	FEIS February 2012	March 2014	September 2014	For the ERP, pre-stripping and mining is expected to commence in September 2014
Borrow Pits and Quarry Management Plan ^{1, 5}	FEIS February 2012	March 31, 2013	May 2013	Site specific quarry permit applications have been prepared and submitted the NWB on a timely basis (Q1 Quarry and QMR2 Quarry)
Roads Management Plan ^{4, 5}	FEIS February 2012	May 2013	June 2013	An update is submitted with the ERP submission (FEIS Addendum Appendix 10D-8)
Shipping and Marine Wildlife Management Plan ^{4, 5}	FEIS February 2012	June 30, 2013	2014	This management plan has been updated to reflect the ERP requirement of shipping via Milne Port (FEIS Appendix 10D-10)
Terrestrial Environmental Management and Monitoring Plan ^{4, 5}	FEIS February 2012	June, 2013	2014	This management plan has been updated to reflect the ERP requirement (FEIS Appendix 10D-11). Several CEPP procedures deal with terrestrial environment
Health & Safety Management Plan ⁵	FEIS February 2012	March 31, 2013	In Effect	Requirement of the Mine Safety Act
Stakeholders Involvement Plan ⁵	FEIS February 2012	As required	In Effect	Implementation in progress
Cultural and Heritage Resource Protection Plan ⁵	FEIS February 2012	As required	In Effect	Implementation in progress
Human Resources ⁵	FEIS February 2012	As required	In Effect	Implementation in progress

Table 10-14.1 List of Management Plans (Change) (Cont'd)

Standard, Plan and Identification Number	Previous Revision Date	Revision Date	Expected Implementation	Comments
Interim Abandonment and Reclamation Plan ^{1,4,5}	FEIS February 2012	June 30, 2013	2035	Preliminary A&R Plan has been updated on the basis of the 2013 work plan and submitted to the NWB. The A&R Plan has been updated to reflect the ERP and is appended to FEIS Addendum Volume 10, Appendix 10G. An update to this A&R Plan will be submitted within a year of issuance of the pending Type A Water Licence
Oil Pollution Emergency Plan – Steensby Port (OPEP) ^{2,5}	FEIS February 2012	2015	July 2015	Management plan not required until the Railway Project is undertaken
Railway Management Plan ⁵	FEIS February 2012	2018	2015	Management plan not required until the Railway Project is undertaken.
Notes: 1) Management plans submitted to the Nunavut Water Board in support of the pending Type A Water Licence 2) Management Plan reviewed by Transport Canada 3) Management Plan approved by NRCan 4) Management plans highlighted are requirements of the FEIS and hard copies are attached as appendices in this Addendum to the FEIS 5) Current version of management plans are provided in electronic format in this Addendum to the FEIS.				

Table 10-14.2 indicates the applicability of each management plan throughout the life of the project.

Table 10-14.2 Applicability of Management Plans During Life of Project (Change)

Standard, Plan and Identification Number	2013 Work Plan	ERP Operation	Construction Approved Project	Operation	Closure	Post Closure
EHS Framework Standard	x	x	x	x	x	x
Hazard Identification and Risk Assessment Procedure	x	x	x	x	x	x
Environmental Protection Plan	x	x	x	x	x	x
Emergency Response and Spill Contingency Plan	x	x	x	x	x	x
Oil Pollution Emergency Plan – Milne Port (OPEP)	x	x	x			
Explosives Management Plan	x	x	x	x		
Blasting Management Plan	x	x	x	x		
Air Quality and Noise Abatement Management Plan	x	x	x	x	x	
Surface Water, Aquatic Ecosystems, Fish and Fish Habitat Management Plan	x	x	x	x	x	
Waste Water Management Plan	x	x	x	x	x	
Waste Management Plan	x	x	x	x	x	

Table 10-14.1 Applicability of Management Plans During Life of Project (Change) (Cont'd)

Standard, Plan and Identification Number	2013 Work Plan	ERP Operation	Construction Approved Project	Operation	Closure	Post Closure
Waste Rock Management Plan	x	x	x	x		
Borrow Pits and Quarry Management Plan	x	x	x	x	x	
Roads Management Plan	x	x	x	x	x	
Shipping and Marine Mammals Management Plan	x	x	x	x		
Terrestrial Environment Management Plan	x	x	x	x		
Health & Safety Management Plan	x	x	x	x	x	x
Stakeholders Involvement Plan	x	x	x	x	x	x
Cultural and Heritage Resource Protection Plan	x	x	x	x		
Human Resources	x	x	x	x	x	x
Abandonment and Reclamation Plan					x	x
Oil Pollution Emergency Plan – Steensby Port (OPEP)			x	x	x	
Railway Management Plan				x		

14.2 TYPE A WATER LICENCE (CHANGE)

All activities of the ERP are well within the scope of Baffinland's pending Type A Water Licence (issuance expected in July 2013). As per the terms and conditions of this Licence, all management plans submitted in support of this Licence are current and are in effect (refer to Table 10-14.2 above). These management plans include:

- Emergency Response and Spill Contingency Plan;
- Construction Environmental Management Plan;
- Surface Water, Aquatic Ecosystems, Fish and Fish Habitat Management Plan;
- Fresh Water, Sewage and wastewater management Plan;
- Waste management Plan;
- Hazardous Material and Hazardous Waste Management Plan;
- Borrow Pits and Quarry Management Plan;
- Explosives management Plan;
- Blasting Management Plan; and
- Aquatic Effect Monitoring Framework.

All the management plans listed above are posted on the Nunavut Water Board public registry.

In addition, the following management plans have been reviewed by the relevant licencing agencies:

- Explosives management Plan (NRCan);
- Oil Pollution Emergency Response Plan (OPEP – Transport Canada); and
- Health and Safety Management Plan (Mines Safety Branch).

14.3 OTHER MANAGEMENT PLANS (CHANGE)

In support of the ERP activities, the following management plans were updated and are appended to this FEIS Addendum submission:

- Appendix 10D-1 Air Quality and Noise Abatement Management Plan;
- Appendix 10D-8 Roads Management Plan;
- Appendix 10D-10 Shipping and Marine Wildlife Management Plan;
- Appendix 10D-11 Terrestrial Environment Management and Monitoring Plan; and
- Appendix 10G Preliminary Abandonment and Reclamation Plan (2013).