



**Report on the
Technical Review of the
NIRB EIS Draft Guidelines for
Baffinland Iron Mines Corporation's
Mary River Project
(NIRB File No. 08MN053)**

By

GeoVector Management Inc.

September 26, 2009



EXECUTIVE SUMMARY

This review is related to a request from the Kivalliq Inuiot Association (KIA) for GeoVector Management Inc. to review the following specific issues related to the NIRB EIS draft guidelines for Baffinland Iron Mines Corporation's Mary River Project (NIRB file no. 08MN053):

- 1) Any specific comments and recommendations on the EIS draft guidelines
- 2) Any potential impacts on marine wildlife along the east coast of Southampton Island that could be related to the shipping route from Steensby Inlet to Hudson Strait.
- 3) Any specific comments and recommendations regarding KIA participation in the IIBA related to the Mary River Project shipping routes.

The specific comments and recommendations on the EIS draft guidelines can be summarized as follows:

- 1) The EIS guidelines should consider use of the Arctic Ice Regime Shipping System (AIRSS) and ice navigators in order to minimize the risk of pollution in Arctic waters due to damage to vessels by ice.
- 2) The EIS guidelines should consider the use of marine mammal monitors as a means of documenting marine mammal populations along the proposed shipping route and as a means to identify potential interactions with shipping operations.
- 3) The EIS guidelines need to describe how potential interactions between marine mammals and shipping operations will be minimized. In addition, the guidelines need to describe how actual interactions between marine mammals and shipping operations will be dealt with.
- 4) The EIS guidelines need to consider using the Traditional Knowledge of the residents of Southampton Island in order to better understand and predict any potential impacts on marine mammals along the east coast of Southampton Island that could be related to the shipping associated with the project.

If the Proponent complies with the requirements of the NIRB EIS guidelines and the existing federal and territorial marine shipping acts and regulations then the impacts on marine wildlife along the east coast of Southampton Island should be minimal. However, the use of traditional knowledge from the residents of Southampton Island should be part of the EIS.

The level of participation by the KIA in the IIBA for the Mary River Project will depend largely on the results of the data collection for the EIS. If the data shows currently un-foreseen impacts on the marine wildlife along the east coast of Southampton Island related to the shipping then the KIA should participate as a key member of the IIBA negotiations. However, if the data shows no significant impacts then the KIA should limit its participation to ensuring that qualified residents of Southampton Island receive training and jobs as marine mammal monitors on shipping related to the project.



TABLE OF CONTENTS

	Page
Executive Summary.....	2
1.0 Introduction.....	4
2.0 Comments and Recommendations on the EIS Draft Guidelines.....	4
2.1 Arctic Ice Regime Shipping System.....	4
2.2 Ice Navigators.....	4
2.3 Air Emissions.....	4
2.4 Marine Mammal Monitors.....	5
2.5 Marine Mammal and Shipping Interactions.....	5
2.6 Impact Assessment.....	5
3.0 Potential Impacts on Southampton Island Marine Wildlife	5
4.0 Comments and Recommendations on IIBA Participation.....	6
5.0 REFERENCES.....	6

APPENDICES

APPENDIX 1	Issues Table, Mary River Project
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1.0 Introduction

This review is related to a request from the Kivalliq Inuiot Association (KIA) for GeoVector Management Inc. to review the following specific issues related to the NIRB EIS draft guidelines for Baffinland Iron Mines Corporation's Mary River Project (NIRB file no. 08MN053):

- 1) Any specific comments and recommendations on the EIS draft guidelines
- 2) Any potential impacts on marine wildlife along the east coast of Southampton Island that could be related to the shipping route from Steensby Inlet to Hudson Strait.
- 3) Any specific comments and recommendations regarding KIA participation in the IIBA related to the Mary River Project shipping routes.

The issues related to the marine transportation aspect of the Mary River Project are discussed in the following text and Appendix 1.

2.0 Comments and Recommendations on the EIS Draft Guidelines

2.1 Arctic Ice Regime Shipping System

The AIRSS should be added for the Proponent to describe. The AIRSS is intended to minimize the risk of pollution in Arctic waters due to damage to vessels by ice.

2.2 Ice Navigators

The use of ice navigators should be added for the Proponent to describe. The use of ice navigators is necessary on board all vessels operating in Arctic ice-covered waters.

2.3 Air Emissions

The Proponent needs to describe how air emissions will be minimized for shipping directly related to the project.



2.4 Marine Mammal Monitors

The use of marine mammal monitors should be added for the Proponent to describe. This use of qualified marine mammal monitors should be considered as a means of documenting marine mammal populations along the proposed shipping route and as a means to identify potential interactions with shipping operations. An outline of the training and qualifications for marine mammal monitors should also be provided by the Proponent.

2.5 Marine Mammal and Shipping Interactions

The Proponent needs to describe how potential interactions between marine mammals and shipping operations will be minimized. In addition, the Proponent needs to describe how actual interactions between marine mammals and shipping operations will be dealt with.

2.6 Impact Assessment

The Proponent needs to consider using the Traditional Knowledge of the residents of Southampton Island in order to better understand and predict any potential impacts on marine mammals along the east coast of Southampton Island that could be related to the shipping route from Steensby Inlet to Hudson Strait.

In addition, the Proponent needs to consider using the knowledge gained by the Voiseys Bay and Raglan mine developments on the impact prediction and the cumulative effects of the shipping related to these mining operations. This information, if available, could assist with the impact assessment.

3.0 Potential Impacts on Southampton Island Marine Wildlife

If the Proponent complies with the requirements of the NIRB EIS guidelines and the existing federal and territorial marine shipping acts and regulations then the impacts on marine wildlife along the east coast of Southampton Island should be minimal. However, the use of traditional knowledge from the residents of Southampton Island should be part of the EIS.

In the event of noticeable impacts from the shipping related to the Mary River Project on the marine wildlife along the east coast of Southampton Island compensation should be forthcoming from the Proponent. This compensation should follow Article 6 of the Nunavut Land Claims Agreement.



4.0 Comments and Recommendations on IIBA Participation

The level of participation by the KIA in the IIBA for the Mary River Project will depend largely on the results of the data collection for the EIS. If the data shows currently un-foreseen impacts on the marine wildlife along the east coast of Southampton Island related to the shipping then the KIA should participate as a key member of the IIBA negotiations. However, if the data shows no significant impacts then the KIA should limit its participation to ensuring that qualified residents of Southampton Island receive training and jobs as marine mammal monitors on shipping related to the project.

5.0 REFERENCES

Baffinland Iron Mines Corporation, Mary River Project, September 21, 2009. Table 1. Baffinland Comments on Revised Draft Guidelines.

Bathory, S. 2009. Memo from QIA to NIRB commenting on Draft Guidelines for the Preparation of an Environmental Impact Statement - Baffinland Iron Mines Corporation's Mary River Project . July 31, 2009.

INAC. 1993. Nunavut Land Claims Agreement

NIRB, 2009. Draft Guidelines for the Preparation of an Environmental Impact Statement for Baffinland Iron Mines Corporation's Mary River Project (NIRB File No. 08MN053). Revision 1, September 2, 2009.

NIRB, 2007. Guide 2: Terminology and Definitions. Updated August 2007.

www.dfo-mpo.gc.ca/species

www.tc.gc.ca/marine_safety/debs/arctic/acts-regulations/awppa