October 1, 2010

NRCan File #NT-056
NIRB File No. 08MN053

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By email: info@nirb.ca

Subject: NRCan's Comments on the Proposed Road Haulage Option for the Baffinland Iron Mine Corporation's proposed Mary River Project

Thank you for your letter dated September 10, 2010, requesting comments from parties on the Baffinland Iron Mines Corporation (BIMC) Mary River project and the new "Road Haulage Option".

Natural Resources Canada's (NRCan) staff has re-reviewed the EIS guidelines in the context the September 7 2010 BIMC letter to the NIRB regarding Road Haulage Options and its appended Road Haulage Option Description, with regards terrain and stability hazards, permafrost, water quality and quantity and its relationship to permafrost, and the effects of climate change on physical environmental processes and project performance.

Within this scope, NRCan offers three comments:

Section 6.5.1 Milne Inlet

The current text can be replaced, with minor modifications, by the text currently included in section 6.5.7 Steensby Inlet. Changes required would include deleting the phrases "including dual rail car dumper", "rail mounted stacker/reclaimer system", and "railway yard and" and replacing references to "Steensby Inlet" with "Milne Inlet".

Section 6.5.2 Tote Road

It may be clearer to replace "Traffic Volume" by "Frequency, tonnage and type of vehicles" that will haul iron ore from the mine and supplies to the mine over the Tote Road.

Section 8.1.4.1 Geology and Geomorphology Baseline Information

The second bullet should be revised to "Marie River Mine Site, Steensby Inlet and Milne Inlet infrastructure."

In addition, in re-reviewing the Guidelines, NRCan notes a potential clarification to the guidelines for NIRB's consideration

Section 8.1.4.2 Geology and Geomorphology Impact Assessment

The current EIS Guidelines wording in this section refers primarily to effects of the environment on the project. This text would be more appropriate under Section 7.13 Impacts of the Environment on the Project (page 42). Instead, the Geology and Geomorphology Impact Assessment section would more appropriately address effects of the project on geohazards (e.g. cuts in slopes that decrease slope stability, blasts that create fractures, impact slope stability), and direct the proponent to include a description of how the proposed project increases or decreases these hazards.

If you have any questions concerning our comments, or if I may be of further assistance, please call me at (613) 943-0773.

Sincerely,

Original signed by

John Clarke
Regional Team Leader
Environmental Assessment
Science and Policy Integration
Natural Resources Canada

cc: Laurent Tardif Minerals and Metals Sector, NRCan