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October 07, 2010

Our file: 4703 003 018
NIRB File: 08MN053

Li Wan
Technical Advisor
Nunavut Impact Review Board
P.O. Box 1360
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Via email: info@nirb.ca

Re: Consideration of a New Alternative in the Draft EIS for the Mary River Project (NIRB: 08MN053)

Thank you for the opportunity to comment on the inclusion of the Road Haulage alternative in the Draft EIS. The alternative proposed by Baffinland would involve trucking iron ore from the Mary River Deposit No. 1 to Milne Inlet, with shipment of the ore to markets during the open water season. The road haulage construction and operation is proposed to occur in parallel with the construction and operation of the railway from Mary River to Steensby Inlet.

Overall EC is of the opinion that the Guidelines are comprehensive, however we offer the following comments:

- 1) The guidelines should require the proponent to provide information related to the timing of construction and operations of the proposed Milne Inlet facilities relative to migratory bird breeding seasons. The guidelines should also require the proponent to provide information on the mitigations proposed to minimize the impact of the expanded Milne Inlet facilities on migratory birds.
- 2) Section 3.2.1 - The Milne Inlet camp and surrounding area will be subject to more development than originally proposed, this should be reflected in the Project Component list provided in 3.2.1.
- 3) Section 5.4.1 – The “Local Study Area” definition provided should clearly require the proponent to consider all shipping routes (ie both Milne and Steensby). As currently written this section appears to focus on only one shipping route.
- 4) Section 6.0 – this section should require the proponent to include a discussion of any planned uses of the Milne Inlet facilities for the project and as well any potential use other than for the Project.
- 5) Section 6.5.1 should be expanded to include associated camp implications similar to what is listed for the Steensby Inlet site (6.5.7.1). In particular more information should be required on stockpile areas, ship loading facilities and haulage related infrastructure. Details on ore stockpile management should include dust suppression and waste water management.

- 6) Section 6.5.2 should include requirements that geological materials exposed or used in construction are benign. For example the "Road Upgrades" section could be edited to require the proponent to: "describe quality control measures to be implemented during construction to ensure that problematic geotechnical materials, such as any potentially acid-generating rock, are not incorporated into the road or unduly exposed."
- 7) Section 7.8 should be edited to require Baffinland to address the cumulative impacts of the increased road and ship traffic volumes that will occur should the Road haulage alternative be adopted.
- 8) Section 8.1.3.2 specifies a noise and vibration impact assessment of the Milne Inlet tote road but it should be expanded to cover ore hauling on the road.
- 9) Section 9.4.3 requires a dust reduction plan, while the requirements are general, they are not sufficiently encompassing to effectively cover ore hauling operations.
- 10) Section 9.4.18 should be broadened to include ore hauling.
- 11) Ore loss/spillage management on transportation routes and at loading facilities should be better addressed in the guidelines for example the topic should be addressed in Sections 6.5.1, 6.5.2, 6.5.5 and 6.5.6 among others.

Should you have any questions regarding the foregoing please contact me at (204) 983 4815 or via email at mark.dahl@ec.gc.ca.

Sincerely,



Mark Dahl

Environmental Assessment and Marine Protection Division
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cc:

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