

# ADDENDUM TO THE

## **GUIDELINES**

FOR THE PREPARATION OF AN ENVIRONMENTAL IMPACT STATEMENT

for

BAFFINLAND IRON MINES CORPORATION'S MARY RIVER PROJECT

(NIRB File No. 08MN053)

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The following information pertains to sections of the "Guidelines for the Preparation of an Environmental Impact Statement for the Mary River Project" (issued November 16, 2009) and should be considered as further guidance to assist in the preparation of a thorough assessment of a "Road Haulage Option" alternative to the Project.

#### **Alternatives (Section 6.1)**

It is understood that a "Road Haulage Option" will be included within this section as a proposed alternative to the Project as originally proposed.

#### **Project Design (Section 6.2)**

In addition the general requirements described in this section, the assessment of the "Road Haulage Option" alternative should include discussion of the design of the Milne Tote Road and Port facilities, particularly engineering features required to mitigate potential impacts to the environment (e.g. potential impacts to wildlife migration given increased traffic volume).

#### **Detailed Project Proposal Description (Section 6.5)**

- 6.5.1 : Milne Inlet
  - Permanent campsite and associated supporting facilities;
  - o Design, construction and operation of port facilities;
  - o Truck fleet parking and maintenance areas;
  - o Ore stock piling, conveyance and management system;
  - o Noise and dust reduction technologies and equipment to be used in ore loading and handling facilities; and
  - O Discussion of the planned uses for the Milne Inlet facilities for the Project as well as any potential uses other than for the Project.
- 6.5.2 : Tote Road
  - o Road design features (e.g. wildlife crossings) to accommodate proposed traffic volumes:
  - Details regarding road construction including construction material to be used and proposed measures to ensure that problematic geotechnical materials, such as any potentially acid generating rock, are not incorporated into the road or unduly exposed;
  - Frequency, tonnage and type of vehicles to be used to haul iron ore and supplies over the Tote Road;
  - o Maintenance services and facilities; and
  - o Procedures for managing and mitigating potential spillage of ore fines on the Tote Road and at the Milne Inlet Port Site.
- 6.5.3: Mary River Mine Site
  - Ore truck loading and handling facilities.
- 6.5.8: Marine Shipping

- Description of open water shipping fleet;
- o Traffic volume and timing;
- o Detailed shipping route; and
- Operational plans and mitigation strategies to address potential interactions with traditional hunting activities.

#### **Cumulative Effects Assessment (Section 7.8)**

Special attention should be paid to marine species and traditional harvesting activities which might be impacted through cumulative effects resulting from the "Road Haulage Option" alternative.

### **Impact Assessment (Section 8.0)**

- Biophysical Environment and impact assessment (Subsection 8.1)
  - o 8.1.2 Air Quality

Baseline information relating to all gaseous emission sources as results of "Road Haulage Option"; and

Potential impacts on air quality, including related dispersion modelling (linear emission sources) as well as air quality predictions on project areas directly or indirectly impacted from road haulage operation.

o 8.1.3 Noise and Vibration

Baseline information relating to all onshore and offshore acoustic and vibration sources, including iron ore transport/hauling and loading and offloading systems; and

Potential impacts associated with increased noise and vibrations resulting from road traffic and open water shipping within the "Road Haulage Option" alternative.

o 8.1.4 Geology and Geomorphology

Description of structural geology, such as fractures and faults, at major project infrastructure areas and where earthworks are proposed (infrastructure areas should also include the Milne Inlet port site if earthworks are required to build a port); and

Potential impacts of the project on geo-hazards (e.g. cuts in slopes that decrease slope stability, blasts that create fractures), as well as shoreline erosion.

o 8.1.9 Freshwater Aquatic Environment Including Biota and Habitat

Potential impacts associated with surface runoff with high concentrations of minerals resulting from road haulage activities.

o 8.1.10 Terrestrial Wildlife and Habitat

Potential impacts resulting from barriers to migration of wildlife, in particular caribou, and related disturbance caused by road traffic.

o 8.1.11 Birds

Potential impacts on migratory birds during breeding seasons, taking into account the timing of construction and operation of the proposed Milne Inlet facilities, and shipping route.

#### o 8.1.13 Marine Wildlife and Marine Habitat

The assessment of potential impacts to marine wildlife and marine habitat from the increased frequency and duration of shipping activities associated with the "Road Haulage Option" alternative should take into account the following:

- 1) Significance of Milne Inlet and Eclipse Sound to marine species, particularly any areas associated with the port facilities and shipping routes which may serve as important habitat for critical lifecycle stages of marine wildlife, such as feeding, calving and nursing grounds;
- 2) Potential impacts to, and interactions with, Inuit harvesting in the port area and along the open water shipping route; and
- 3) Implications of project activities for the proposed establishment of a Lancaster Sound National Marine Conservation Area (NMCA).
- Socio-Economic Environment (Subsection 8.2)
  - 8.2.2 Education and Training

Discussion of the potential impacts of project components on local education and training opportunities, taking into account any associated increase in labour demand and required skills to support the port operation and road services.

o 8.2.3 Livelihood and Employment

Discussion of the potential impacts of project components on livelihood and employment opportunities for Nunavut communities.

o 8.2.5 Human Health and Well-being

Potential impacts to human health as a result of the road haulage activities, such as exposure to noise, dust and gaseous emissions from trucks; and

Potential impacts to human health and well-being of local communities associated with impacts of the "Road Haulage Option" alternative on marine and terrestrial country food sources.

o 8.2.6 Community Infrastructure and Public Services

Potential impacts of an associated increased labour force on community infrastructure and public services during the project life cycle.

o 8.2.7 Contracting and Business Opportunities

Discussion of contracting and business opportunities associated with the "Road Haulage Option" alternative.

8.2.8 Culture, Resources and Land Use

Potential impacts to archaeological and paleontological resources and other cultural sites as a result of an increased project footprint associated with facilities and infrastructure for the "Road Haulage Option" alternative; and

Potential impacts to cultural and traditional values, traditional lifestyles and heritage in the potentially affected communities, given the proximity of project infrastructure and activities.