

March 30<sup>nd</sup>, 2012

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Nunavut Impact Review Board  
P.O. Box 1360  
Cambridge Bay, NU X0A 0H0

***via Email to: [info@nirb.ca](mailto:info@nirb.ca)***

**RE: NIRB: 08MN053 – Information Requests for the Baffinland Iron Mines Corporation, Mary River Project, Final Environmental Impact Statement.**

Dear Li Wan:

On behalf of the Government of Nunavut (GN), I would like to thank the Nunavut Impact Review Board (NIRB) for the opportunity to submit Information Requests (IRs) to Baffinland Iron Mines Corporation and/or other parties regarding the Final Environmental Impact Statement (FEIS) submission for the Mary River project proposal.

The following IR regarding the Mary River project proposal (Appendix A) are being sought to fill information gaps and clarify areas of uncertainty with the FEIS such that the GN can formulate its conclusions regarding the ecosystemic and socio-economic effects of the project and develop its submissions to be presented during a Final Hearing.

Most of the issues identified could be resolved in whole or part through the provision of additional information and/or clear commitments by the project Proponent in advance of a Final Hearing.

Through the preliminary review of the FEIS, the GN acknowledges that some of the commitments have been fulfilled by the proponent. The GN believes the following, but not limited to, commitments and/or issues have not been fully addressed such that the GN can formulate its conclusions:

- Inconsistencies in data analysis within the temporal and spatial scales of predictive models for impacts to caribou.
- Inconsistencies with the analysis of the spatial and temporal impacts of shipping on Polar bears.
- Insufficient information in emergency spill response plans.
- Commitments to a long term relationship between the proponent and relevant GN department for the exchange of data and participation in regional monitoring programs.
- Clarification on the use and impacts to the Iqaluit Airport and related facilities/services.



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Ministère de l'Exécutif et des Affaires Intergouvernementales

Department of Executive & Intergovernmental Affairs

- Confidence in the proponent's estimates of revenues that the GN might be expected to receive from the Project and the timing of those revenues in relation to the GN's anticipated costs.
- Clarification regarding impacts to services provided by the GN to protect the health and well-being of all Nunavummiut.

If previous commitments and residual issues remain unaddressed or unresolved in the FEIS submission, the GN remains confident they may be resolved through discussions at the Technical Meeting in advance of the Final Hearing or at the Hearing itself. The GN looks forward to the Proponent's responses and further discussions at a Technical Meeting.

Again, we thank the NIRB for providing the GN with the opportunity to review and provide our Information Requests. The GN looks forward to continued participation in reviewing the Environmental Impact Statement for the Mary River Project. Please do not hesitate to contact me at (867) 975-6071 if you have any questions or comments.

Qujannamiik,

John Price

Avatilirinirq (Environment) Coordinator

**Appendix A – Government of Nunavut Information Requests for  
Baffinland Iron Mines Corporation, Mary River Project.**

INFORMATION REQUEST SUBMISSION FORM			
<b>Reviewer:</b>	Department of Culture, Elders, Language, Youth	<b>Information Request #:</b>	1
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS, Volume 4, Section 9.6.2, Section 9.6.3.4, Section. 9.6.3.5.		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>It is the Department of Culture, Elders, Language, Youth's (CLEY) practice and preference that any buffers that are applied as measures to protect cultural and heritage resources, be applied from cultural and heritage resources outwards rather than around project components or development activities as they appear to be in the FEIS volumes noted above.</p> <p>The Proponent is requested to provide the following information:</p> <ul style="list-style-type: none"> <li>a) a clear statement regarding their understanding of how the buffer distance concept promoted by CLEY was used to protect cultural and heritage resources and;</li> <li>b) whether or not the application of buffers from cultural and heritage resources outwards rather than around project components or development activities results in an increase the potential for disturbance of any known cultural or heritage resources.</li> </ul>		
<b>Rationale:</b>	<p>A clear understanding of the proponents approach to the protection of cultural and heritage resources is important to determine whether or not cultural and heritage resources have been afforded a sufficient level of protection. This information is needed to determine the Proponent's compliance with the <i>Historical Resources Act</i> and other GN policies and guidelines. This information will also be important in the GN's consideration of a Project Certificate's terms and conditions and is directly related to Term and Condition 309.</p>		

**Appendix A – Government of Nunavut Information Requests for  
Baffinland Iron Mines Corporation, Mary River Project.**

INFORMATION REQUEST SUBMISSION FORM			
<b>Reviewer:</b>	Department of Culture, Elders, Language, Youth	<b>Information Request #:</b>	2
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS, Volume 3, Section 2.3; FEIS, Volume 4, Appendix 4D		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>The FEIS indicates that the project may require minor adjustments and/or realignments of the tote road for the purposes of large transport equipment, but does not make a commitment to the potential for such adjustment and/or realignments of the tote road to be undertaken for the purpose of protecting cultural and heritage resources.</p> <p>The Proponent is requested to confirm whether not it would consider adjustments and/or realignments to the tote road for the purpose of protecting cultural and heritage resources. If not, what measures are proposed by the Proponent for the protection of cultural and heritage resources disturbed by the tote road.</p>		
<b>Rationale:</b>	<p>It is the GN's Department of CLEY's position that all feasible measures to avoid cultural and heritage resources be considered in the design of a Project, including adjusting the locations and alignments of roads and other Project infrastructure as required. This information will be important in the GN's consideration of a Project Certificate's terms and conditions and is directly related to Term and Condition 306. This information is required for the GN to make a determination as to the effectiveness of mitigation and the significance of effects.</p>		

**Appendix A – Government of Nunavut Information Requests for  
Baffinland Iron Mines Corporation, Mary River Project.**

<b>INFORMATION REQUEST SUBMISSION FORM</b>			
<b>Reviewer:</b>	Department of Culture, Elders, Language, Youth	<b>Information Request #:</b>	3
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS, Volume 4, Section 9.6.2		
<b>Issue/Concern or Information Deficiency and Request:</b>	The proponent is asked to clarify why the distance from the centre-line of the road was selected as the point-of-origin for the proposed mitigation measure.		
<b>Rationale:</b>	The centre-line of a road is not considered to be an appropriate point of measure for development activities. The edge of the road (on both sides of the road) should be considered as the origin for the proposed mitigation measure to afford protection to cultural and heritage resources along the proposed road.		

**Appendix A – Government of Nunavut Information Requests for  
Baffinland Iron Mines Corporation, Mary River Project.**

INFORMATION REQUEST SUBMISSION FORM			
<b>Reviewer:</b>	Department of Culture, Elders, Language, Youth	<b>Information Request #:</b>	4
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS, Volume 4, Section 9.3.1, Section 9.6.2, Section 9.6.3.4, Section 9.6.3.5; FEIS, Volume 4, Appendix 4D, Section 5.1		
<b>Issue/Concern or Information Deficiency and Request:</b>	The FEIS documentation in Volume 4 (Sec. 9.3.1, Sec. 9.6.2, Sec. 9.6.3.4, and Sec. 9.6.3.5; and, Volume 4: App. 4D, Sec. 5.1) is inconsistent in terms of the distance that is applied from any infrastructure (e.g. road) for the protection of cultural and heritage resources. Baffinland is requested to clearly state the distance it applied from any infrastructure as a measure for the protection of cultural and heritage resource throughout the FEIS.		
<b>Rationale:</b>	This information is needed to determine the level of protection afforded to cultural and heritage resources along the proposed road and any infrastructure and to determine the Proponent's compliance with the <i>Historical Resources Act</i> and other GN policies and guidelines. This information will also be important in the GN's consideration of a Project Certificate's terms and conditions. It is the Department of Culture, Elders, Language, Youth's position that all feasible measures to avoid cultural and heritage resources be considered in the design of a Project, including adjusting the locations and alignments of roads and other Project infrastructure as required.		

**Appendix A – Government of Nunavut Information Requests for  
Baffinland Iron Mines Corporation, Mary River Project.**

INFORMATION REQUEST SUBMISSION FORM			
<b>Reviewer:</b>	Department of Culture, Elders, Language, Youth	<b>Information Request #:</b>	5
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS, Volume 6, Appendix 6A		
<b>Issue/Concern or Information Deficiency and Request:</b>	The Proponent is asked to clarify and address how measures identified in the report provided in Vol. 6: App. 6A will be implemented.		
<b>Rationale:</b>	The Department of Culture, Language, Elders and Youth is the regulatory agency responsible palaeontological resources protection and preservation. This information is required to determine the Proponent's compliance with the <i>Historical Resources Act</i> and other GN policies and guidelines.		

**Appendix A – Government of Nunavut Information Requests for  
Baffinland Iron Mines Corporation, Mary River Project.**

INFORMATION REQUEST FORM			
<b>Reviewer:</b>	Department of Environment, Environmental Protection Division	<b>Information Request #:</b>	6
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS, Volume 10, Section 6.3.4, Appendix 10C-3		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>The GN understands that a Draft OPEP for Steensby Port is located in Volume 10 Appendix 10C-3 and that this draft has been used during the pre-development and exploration phase of the Project. In reviewing the OPEP for Steensby Inlet, it appears that a fuel vessel will be over-wintered (pg 14). It is unsure whether this activity is for pre-development work or for work following the issuing of a project certificate.</p> <p>If in fact there will be over-wintering of fuel barges during the construction phase of the Project, the GN requests the following further details:</p> <ul style="list-style-type: none"> <li>a) the volume of fuel will be stored;</li> <li>b) which years this will occur and;</li> <li>c) the type of barge that will be over-wintered.</li> </ul> <p>Additionally, the following questions must be answered detailing procedures for cleaning a potential spill from the over-wintered barge:</p> <ul style="list-style-type: none"> <li>d) how will fuel ullage be monitored;</li> <li>e) how precise is this monitoring method in determining fuel ullage and, further, if a leak were to develop in the barge, how much product will have escaped before the loss is detected and;</li> <li>f) how the Proponent intends to respond to spills on and under ice. This information could be included as an additional potential fuel spill scenario in the OPEP.</li> </ul>		



<b>Rationale:</b>	<p>The GN requires further clarity from the Proponent regarding these matters as they relate directly to the GN's responsibilities under the <i>Environmental Protection Act</i>, along with the Spill Planning and Reporting Regulations. This information will also be important in the GN's consideration of a Project Certificate's terms and conditions. It relates to Commitment No. 323, which commits the Proponent to maintaining an Emergency Response and Spill Contingency Plan that is current and adapted to the level of activities at the Mary River project.</p>
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Baffinland Iron Mines Corporation, Mary River Project.**

<b>INFORMATION REQUEST SUBMISSION FORM</b>			
<b>Reviewer:</b>	Department of Environment, Wildlife Division	<b>Information Request #:</b>	7
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS, Volume 10, Appendix 10B (referring to Volume 3, Appendix 3B), Attachment 5, Environmental Protection Plan, Section 2.10		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>The Environmental Protection Plan deals with polar bear safety. The GN requests that:</p> <ul style="list-style-type: none"> <li>a) the Proponent describes the training that wildlife monitors and staff will obtain; how often this training is to be continued throughout the operation or will it be for new staff only;</li> <li>b) the Proponent confirms whether or not human-polar bear interactions will be monitored and data regarding each incident recorded;</li> <li>c) the Proponent confirms whether data on these interactions will be reported only to a Company supervisor or whether these instances would also be reported to the nearest Conservation Officer by phone or email and;</li> <li>d) the Proponent confirms their expectations from the GN regarding inspections from a Wildlife Deterrent Specialist and/or a GN polar bear biologist and describe the measures the Proponent will take to facilitate access to the Project sites.</li> </ul>		
<b>Rationale:</b>	It is the GN's Department of Environment, Division of Wildlife's mandate to manage terrestrial wildlife species in Nunavut. Bear and human safety interaction on a long-term perspective is a part of this terrestrial management. This information is required for the GN to make a determination as to the effectiveness of mitigation and the significance of effects.		

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Baffinland Iron Mines Corporation, Mary River Project.**

<b>INFORMATION REQUEST SUBMISSION FORM</b>			
<b>Reviewer:</b>	Department of Environment, Wildlife Division	<b>Information Request #:</b>	8
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS, Volume 10, Appendix. 10B (referring to Volume 3, Appendix 3B), Attachment 5, Environmental Protection Plan, Section 2.8		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>Attachment 5, Environmental Protection Plan, App. 10B, Section 2.8 deals with aircraft flights and a minimum altitude of 610m during horizontal flights is suggested. Volume 8. Section 5 on marine mammals suggests a minimum altitude of 450m. The GN requests that:</p> <p>a) the proponent confirms the minimum altitude that is recommended for horizontal flights in order to minimize disturbance to wildlife.</p>		
<b>Rationale:</b>	This information is required to remove ambiguity from the assessment and for the GN to make a determination as to the effectiveness of mitigation and the significance of effects. It is important to have consistency throughout the FEIS.		

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Baffinland Iron Mines Corporation, Mary River Project.**

INFORMATION REQUEST SUBMISSION FORM			
<b>Reviewer:</b>	Department of Environment, Wildlife Division	<b>Information Request #:</b>	9
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS, Volume 3, 3.6.3.2 and related maps		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>The shipping route that is proposed through Hudson Strait, Foxe Basin, into Steensby Port traverses through primary polar bear habitat. The GN requests that :</p> <ul style="list-style-type: none"> <li>a) the Proponent provides a list of proposed mitigation for disturbance effects on polar bears from shipping, particularly with respect to feeding and mating activity;</li> <li>b) the Proponent confirms whether or not on-board local monitors will be present to look out for any bear activity on the ice while the ships approach;</li> <li>c) the Proponent describes the decision-making authority these monitors will have regarding shipping activity and;</li> <li>d) the Proponent describes the specific protocols that that the shipping company and/or local monitors will follow on a daily basis. If these protocols are not available, the Proponent should confirm whether or not the GN will be afforded an opportunity to review and comment on these protocols.</li> </ul>		
<b>Rationale:</b>	<p>Due to the frequent shipping traffic in primary polar bear habitat, frequent encounters are likely and safeguards should be planned to prevent negative effect on this species. Under the <i>Nunavut Wildlife Act</i>, the Department of Environment is responsible for the protection of polar bears. This information is also required to remove ambiguity from the assessment and for the GN to make a determination as to the effectiveness of mitigation and the significance of effects.</p>		

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INFORMATION REQUEST SUBMISSION FORM			
<b>Reviewer:</b>	Department of Environment, Wildlife Division	<b>Information Request #:</b>	10
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS, Volume 6, Appendix 6F, Section 4.2		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>The results of the RSPF depend on which model is selected, its strengths and weaknesses. An evaluation of the results of the RSPF is not currently possible by the GN without further details regarding the model and parameters used. The GN requests that:</p> <ul style="list-style-type: none"> <li>a) the Proponent provides a clear explanation as to why the Hosmer-Lemeshaw goodness-of-fit statistic was used over AIC (Akaike Information Criterion) to select the best-fit model and;</li> <li>b) the Proponent provides a definition of the term AUC included in Tables 15, 18 and 21. A list of candidate models used in the selection process should also be included.</li> </ul>		
<b>Rationale:</b>	<p>The Pre-Hearing Conference Decision Report Commitment #189 requested that the Proponent identify and describe each of the parameters incorporated in the Resource Selection Probability Function (RSPF) and describe the strengths and limitations of the data used for each RSPF parameter such that the implications to the model outcome are fully understood. This commitment was not fulfilled to the satisfaction of the GN. This information is a necessity for a good understanding of the project by the Division of Wildlife.</p>		

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Baffinland Iron Mines Corporation, Mary River Project.**

INFORMATION REQUEST SUBMISSION FORM			
<b>Reviewer:</b>	Department of Environment, Wildlife Division	<b>Information Request #:</b>	11
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS, Volume 6, Appendix 6F, Section 4.2		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>In the section “Spatial Data Layers”, it is written that: “The DEM was used to derive slope and aspect layers.” Then, in Tables 15, 18 and 21, DEM and DEM2 become variables included in the models, in addition to slope and aspect. The GN requests that:</p> <p style="padding-left: 40px;">a) the proponent provides a clear definition of the variable “DEM “ and describe how it differs from slope and aspect, and why it was included in addition to slope and aspect in the models.</p>		
<b>Rationale:</b>	<p>The Pre-Hearing Conference Decision Report Commitment #189 requested that the Proponent identify and describe each of the parameters incorporated in the Resource Selection Probability Function (RSPF) and describe the strengths and limitations of the data used for each RSPF parameter such that the implications to the model outcome are fully understood. This commitment was not fulfilled to the satisfaction of the GN. This information is a necessity for a good understanding of the project by the Division of Wildlife. This could have severe implication on the selected model for the resource selection function and therefore affect the main conclusions for the caribou impact.</p>		

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<b>INFORMATION REQUEST SUBMISSION FORM</b>			
<b>Reviewer:</b>	Department of Environment, Wildlife Division	<b>Information Request #:</b>	12
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS, Volume 3, Section 3.6.3.2		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>The FEIS states that 136 ship transits and 102 round-trips will be completed in Foxe Basin between November and June. Further, the FEIS notes that “Due to the extreme cold, the ship track will quickly begin to refreeze, and the frequency of transits means that ice formation will be continuous, resulting in the build-up of rubble in the track over time. Consequently, the track will gradually widen from the initial width of 50 metres to 1.5 km or more by late winter as subsequent transits are made to the side of previous tracks”.</p> <p>The GN requests further information regarding the shipping track. Specifically, the GN requests that:</p> <p>a) he Proponent clarifies what is meant by “...more than 1.5 km” by quantifying or providing professional opinion as to how wide the shipping track can be expected to be.</p>		
<b>Rationale:</b>	The width of the shipping track has implication for the sea ice quality and therefore, for the marine wildlife such as polar bears and seals. This information is required for the GN to make a determination as to the effectiveness of mitigation and the significance of effects.		

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INFORMATION REQUEST SUBMISSION FORM			
<b>Reviewer:</b>	Department of Environment, Wildlife Division	<b>Information Request #:</b>	13
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS, Volume 8, Section 5.12.2.1		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>The FEIS states that the area of pack ice that will be disrupted temporarily by a single ore carrier passage is estimated at 76.5 km<sup>2</sup> during the period of maximal ice coverage. Evidence of the ship track in the mobile pack ice will quickly disappear because of the movement of the ice by winds and tide (Volume 3, Appendix 3G) and it is assumed that bearded seals will re-use this area of ice. The GN suggests that this 76.5 km<sup>2</sup> area seems too small given the shipping routes provided that cross the whole of Davis Strait and Hudson Bay. The GN requests that:</p> <ul style="list-style-type: none"> <li>a) the Proponent confirms that the total area disturbed is in fact 76.5 km<sup>2</sup>;</li> <li>b) the Proponent describes how this area of 76.5 km<sup>2</sup> was estimated and;</li> <li>c) the Proponent provides evidence to support the contention that bearded seals will reuse the disturbed area of ice.</li> </ul>		
<b>Rationale:</b>	This information is required to remove ambiguity from the assessment and for the GN to make a determination as to the significance of effects on bearded seals and consequently on polar bears, which are protected through the <i>Nunavut Wildlife Act</i>		



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INFORMATION REQUEST SUBMISSION FORM			
<b>Reviewer:</b>	Department of Environment, Wildlife Division	<b>Information Request #:</b>	14
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS, Volume 6, table 6.5.1, Page 142 FEIS, Volume 6, Page 141		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>The FEIS states that emissions from the Tote Road are included with the estimates from the railway and ports. However Table 6-5.1 suggests that the road is included with the mine site. Given the fact that the road can also produce dust, it is GN's contention that a conservative estimate would be based on the values indicated in the table. The GN requests that:</p> <ul style="list-style-type: none"> <li>a) the Proponent confirms how the dust emissions from the Tote Road were estimated and how they were included in the derivation of the Zone of Influence (ZOI) and;</li> <li>b) the Proponent confirms the geographic extent of the ZOI and whether or not this was undertaken using the values in Table 6-5.1.</li> </ul>		
<b>Rationale:</b>	This information is required to remove ambiguity from the assessment and for the GN to make a determination as to the magnitude and the significance of effects on vegetation and wildlife.		

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INFORMATION REQUEST SUBMISSION FORM			
<b>Reviewer:</b>	Department of Environment, Wildlife Division	<b>Information Request #:</b>	15
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS, Volume 6, Section 5.2		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>The FEIS states that the overall magnitude of effect is determined at the scale of the north Baffin Island Caribou range. It is the GN's opinion that this is likely to bias the conclusion towards a "low" magnitude rating. The GN suggests that estimating the magnitude of effects on caribou at the scale of RSA is a more relevant scale. The GN requests that :</p> <p>a) the Proponent re-evaluates the relevant effects on caribou based on the scale of the RSA and/or provides a sensitivity analysis for each relevant effect.</p>		
<b>Rationale:</b>	<p>Given the low density of caribou in North Baffin and their declining numbers, estimating a magnitude of effect is relevant at the scale of an area still hosting caribou. This information is required to remove ambiguity from the assessment and for the GN to make a determination as to the magnitude and the significance of effects on caribou, which are protected under the <i>Nunavut Wildlife Act</i>.</p>		

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<b>Reviewer:</b>	Department of Environment, Wildlife Division	<b>Information Request #:</b>	16
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS, Volume 6, Section 5.2		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>The GN requests that the Proponent provides the following estimates based on the caribou collaring data used in the FEIS analysis:</p> <ul style="list-style-type: none"> <li>a) the proportion of caribou that crossed the existing road, the planned road and railway route during the collar study;</li> <li>b) the proportion of segments between successive locations overlapped the road, the planned road and railway route and;</li> <li>c) the proportion of home ranges overlapping the mine site and ZOI.</li> </ul>		
<b>Rationale:</b>	<p>To determine the effect of infrastructure on animal movement, it is considered to be standard practice to estimate the proportion of animals that are known marked or the proportion of movement produced by such animals. This information is required for the GN to make a determination as to the magnitude and the significance of effects on caribou, which is protected under Nunavut's <i>Wildlife Act</i>.</p>		

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<b>Reviewer:</b>	Department of Environment, Wildlife Division	<b>Information Request #:</b>	17
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS, Volume 6 overall		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>Baseline aerial surveys identified active wolf dens and visual observations of breeding pairs in the RSA (around mine site, including along the proposed rail and Milne Inlet road). This suggests that the RSA is commonly used by wolves for reproduction. Being a “top carnivore” of the Baffin Island terrestrial ecosystem, and a distinct subspecies (<i>Canis lupus manningi</i>) of the NA Gray Wolf; Baffin Island wolves have a distinct ecology from other tundra wolves. They have only one major prey available, namely, the caribou. The wolf is listed both as furbearer and a big game species under NLCA, and is harvested for both commercial and subsistence use and listed as a VEC by several boards of Nunavut (e.g. NWMB). The GN requests that the Proponent provides its conclusions regarding the nature of the effects of the project on Baffin Island wolves and their likely significance. This assessment could be based on the assessments of effects on other VECs or additional analysis could be undertaken.</p>		
<b>Rationale:</b>	<p>It is the GN’s view that a single VEC species (caribou) from terrestrial wildlife is unlikely to represent an ecosystem’s response to the Project. This information is required for the GN to make a determination as to the magnitude and the significance of effects on wolves and the overall eco-systemic effects of the Project.</p>		

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<b>Reviewer:</b>	Department of Environment, Wildlife Division	<b>Information Request #:</b>	18
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS, Volume 6 overall		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>Baseline aerial surveys identified active wolf dens and visual observations of breeding pairs in the RSA (around mine site, including along the proposed rail and Milne Inlet road), This suggests that the RSA is commonly used by wolves for reproduction. The GN requests that:</p> <p>a) the Proponent confirms whether or not wolf den occupancy and success is to be included in the wildlife monitoring program for wolves. If not, the Proponent should provide a rationale.</p>		
<b>Rationale:</b>	<p>This information is required for the GN to make a determination as to the adequacy of the monitoring program to address the overall eco-systemic effects of the Project. Given the low density of top predators in the Arctic, finding active dens of wolves in the RSA is a clear indicator of an area with key caribou remaining presence. Wolf den occupancy and success are the most commonly used indicator of effects to wolves.</p>		

**Appendix A – Government of Nunavut Information Requests for  
Baffinland Iron Mines Corporation, Mary River Project.**

INFORMATION REQUEST SUBMISSION FORM			
<b>Reviewer:</b>	Department of Environment, Wildlife Division	<b>Information Request #:</b>	19
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS, Volume 1, Section 5.2, Section 3.2 FEIS, Volume 6, Section 4.3, Section 4.10.1, Section 4.12.6, Section 5.1, Section 5.3.2		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>Baseline reports described that wolf dens are identified in suitable soils (glacio-fluvial materials/Esker habitat); other studies on tundra (<i>Mcloughlin et al. 2004, Journal of Mammalogy, 85(3):576–580</i>) identified wolves association with glacio-fluvial materials (eskers) and described that esker habitat was strongly preferred at the level of the home range. In other areas of the tundra, glacio-fluvial materials are identified as an important source of granular material for road and mine construction. The Mary River Project is also proposing to use glacio-fluvial material for road and rail track construction. Therefore, there is a potential conflict between wolf preferred habitat and project. Given that the granular and sandy composition of this glacio-fluvial material provides suitable habitat for excavation of dens and burrowing to small prey mammals, the GN requests that:</p> <ul style="list-style-type: none"> <li>a) the Proponent provides an estimate of the available (glacio-fluvial materials) esker habitats within the RSA;</li> <li>b) the Proponent confirms whether or not this habitat type was identified as ecologically sensitive. If not, the Proponent is requested to provide its conclusions regarding the effects of the Project on wolves.</li> </ul>		
<b>Rationale:</b>	This information is required for the GN to make a determination as to the magnitude of effects on wolves, which are protected under Nunavut's <i>Wildlife Act</i> and to address the overall eco-systemic effects of the Project.		



**Appendix A – Government of Nunavut Information Requests for  
Baffinland Iron Mines Corporation, Mary River Project.**

<b>INFORMATION REQUEST SUBMISSION FORM</b>			
<b>Reviewer:</b>	Department of Environment, Wildlife Division	<b>Information Request #:</b>	20
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS, Volume 3, Section 2.4.6		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>More details are required in the Proponent's plan for managing wastes and odours such that effects on wildlife are minimized.</p> <p>The GN requests the Proponent to confirm whether or not the following measures are included in the finalized plans for managing wastes and odours. If not, the Proponent is requested to provide a rationale for its conclusions.</p> <ul style="list-style-type: none"> <li>a) Installation of incinerator beside the kitchen, that will help to keep the food waste management process simple in order to minimize the opportunity for human error, which often results when additional steps are added to the process (i.e. storage of garbage outside, hauling in a truck (odours remain in truck), hauling some distance to a landfill site, incomplete combustion at landfill, fencing of landfill, etc.).</li> <li>b) Installation of solid carnivores proof skirting on all kitchen and accommodation buildings (i.e., heavy-duty steel mesh that would drop down from the edge of the buildings/trailers and buried about a half meter into the ground to prevent animals from digging under the skirting)</li> </ul>		



<b>Rationale:</b>	<p>This information is required for the GN to make a determination as to the effectiveness of mitigation to minimize adverse effects on wildlife. Moreover, given that retrofitting building designs may be cost prohibitive, it is the GN's opinion that a precautionary approach is required.</p> <p>Carnivores attraction to camps and other buildings is a main concern for both carnivores but also for the security of the camp holders and the long-term use of the infrastructure. Ignoring such an issue is not in keeping with the precautionary principle. The GN notes that another company in Nunavut undertaking new building construction and expansion experienced a major loss in investment and the destruction of some key parts of their facility as mitigation measures were not implemented.</p>
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**Appendix A – Government of Nunavut Information Requests for  
Baffinland Iron Mines Corporation, Mary River Project.**

<b>INFORMATION REQUEST SUBMISSION FORM</b>			
<b>Reviewer:</b>	Department of Environment, Wildlife Division	<b>Information Request #:</b>	21
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS, Volume 6, Appendix 6F, Figures 21, 22, 23		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>There is no scale linked to the habitat selection probability for the caribou. This is true for all the maps with habitat selection probability (e.g. in volume 6). The GN requests that:</p> <p>a) the Proponent prepares a set of maps that clearly indicate what habitats are high and a low probability on a scale from 0 to 1.</p>		
<b>Rationale:</b>	<p>This information is required for the GN to make a determination as to the geographic extent and likelihood of adverse effects on wildlife. The GN notes that a probability is always between 0 and 1 and appropriate scale is always a standard when one has to provide a scale of probabilities. It is also a safeguard for comparison purposes: e.g. when one wants to check between species where their habitat selection process is similar or not. Only stating higher or lower does not say how much exactly. Here this is critical, as much of the potential impact on wildlife is based on probability not on actual data itself. This IR relates to Commitment Nos. 189 and 196, which commits the Proponent apply the RSPF at the ZOI scale.</p>		

**Appendix A – Government of Nunavut Information Requests for  
Baffinland Iron Mines Corporation, Mary River Project.**

<b>INFORMATION REQUEST SUBMISSION FORM</b>			
<b>Reviewer:</b>	Department of Environment, Wildlife Division	<b>Information Request #:</b>	22
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS, Volume 6, Table 6-5.2		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>In mathematics, probabilities can be summed but never be above 1. A probability of 2,000 does not mean anything. The GN requests that:</p> <ul style="list-style-type: none"> <li>a) the Proponent explains the probabilistic/mathematical methods applied to determine a probability of 2,000 as indicated in Volume 6, Table 6-5.2. Any errors should be corrected.;</li> <li>b) the Proponent re-evaluates the Change in Effectiveness of Caribou Habitat within the RSA and the North Baffin herd range on the basis of probabilities within a range from 0 to 1. This will likely affect the conclusions drawn with respect to the significance of effects on Caribou.</li> </ul>		
<b>Rationale:</b>	This information is required for the GN to make a determination as to the magnitude, extent and likelihood of adverse effects on caribou. The GN reiterates that in mathematics, probabilities can be summed but never be above 1.		

**Appendix A – Government of Nunavut Information Requests for  
Baffinland Iron Mines Corporation, Mary River Project.**

INFORMATION REQUEST SUBMISSION FORM			
<b>Reviewer:</b>	Department of Environment, Wildlife Division	<b>Information Request #:</b>	23
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS Volume 6, Section 5.2.2. FEIS Volume 6, Appendix 6F overall		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>In many publications on caribou, scientists have seen a fast response of caribou to human activities. Given the fact that collaring data used in the FEIS analysis was collected during a time when exploration and other activities were already occurring in the ZOI, the GN requests that:</p> <p style="padding-left: 40px;">a) the proponent acknowledges this uncertainty and provides an analysis of how this activity might have affected the behaviour of caribou and the conclusions reached in the FEIS regarding caribou movements, calving and survival</p>		
<b>Rationale:</b>	This information is required for the GN to make a determination as to the magnitude, extent and likelihood of adverse effects on caribou, which are protected under Nunavut's <i>Wildlife Act</i> . This information is required for the GN to make a determination as to the Proponents application of the Precautionary Principle.		

**Appendix A – Government of Nunavut Information Requests for  
Baffinland Iron Mines Corporation, Mary River Project.**

INFORMATION REQUEST SUBMISSION FORM			
<b>Reviewer:</b>	Department of Environment, Wildlife Division	<b>Information Request #:</b>	24
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffin Iron Mines Corporation		
<b>References:</b>	FEIS Volume 10, Appendix 10E (referring to Volume 3, Appendix 3B)		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>The GN requests that:</p> <p>a) the Proponent prepares a detailed human-wildlife conflict management plan for review and comment by the GN such that it can be implemented prior to construction.</p>		
<b>Rationale:</b>	<p>This information is required for the GN to make a determination as to the effectiveness of mitigation to minimize adverse effects on wildlife. A statement of intention that human-bear conflict will be assessed is not sufficient for the GN to understand the precise actions and plans being taken by the company to minimize any human-wildlife hazard. Sharing the details of such actions and plans will help secure long-term security for both human and wildlife in the RSA.</p>		

**Appendix A – Government of Nunavut Information Requests for  
Baffinland Iron Mines Corporation, Mary River Project**

INFORMATION REQUEST SUBMISSION FORM			
<b>Reviewer:</b>	Department of Environment, Wildlife Division	<b>Information Request #:</b>	25
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS Volume 6, Section 5.2.2 FEIS Volume 10, Appendix 10D-11, Section 3.3.3		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>The GN would like to reiterate commitment number 211:</p> <p>“Clarify under what circumstances would trigger the application of limiting train traffic as a mitigation measure for caribou and provide information in mitigation plans to limit train traffic.”</p> <p>The GN requires the Proponent to respond to this commitment outside the IIBA.</p> <p>The Proponent may need an adaptive management plan utilizing various scenarios of caribou presence, density and movement patterns to implement this mitigation measure.</p>		
<b>Rationale:</b>	The private agreement that the Proponent has with QIA (the IIBA) should not be seen or accepted as a form of mitigation for the adverse effects on caribou from impacts from the rail way. This information is required for the GN to make a determination as to the effectiveness of mitigation and the significance of effects.		

**Appendix A – Government of Nunavut Information Requests for  
Baffinland Iron Mines Corporation, Mary River Project.**

<b>INFORMATION REQUEST SUBMISSION FORM</b>			
<b>Reviewer:</b>	Nunavut Research Institute	<b>Information Request #:</b>	26
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS, Volume 10, Appendix 10 D-12, Attachment 5 FEIS, Volume 10, Appendix 10 D-13		

<b>Issue/Concern or Information Deficiency and Request:</b>	<p>At this point in the Environmental Assessment process and given the Pre-construction work that is likely to be undertaken, the Government of Nunavut requests that the Proponent provide a more detailed description of information management issues related to their Environmental Monitoring Plan (EMP) and/or Environmental Effects Monitoring (EEM) programs. Specifically, the GN requests discussion of the following items:</p> <ul style="list-style-type: none"> <li>a) how the various environmental monitoring activities will be coordinated to avoid duplication of effort and make efficient use of resources, time and expertise (e.g. coordinated sampling regimes, sharing of equipment and data among programs)?</li> <li>b) how will monitoring datasets will be centralized, analyzed, stored, and results communicated to stakeholders?</li> <li>c) who does the Proponent intend to involve in the development of the detailed EMP and the individual EEM programs?</li> <li>d) what is the proposed role of the GN, including the NRI in the development and implementation of these programs?</li> </ul> <p>The GN requests that the Proponent clearly specify the following:</p> <ul style="list-style-type: none"> <li>e) whether or not a central, accessible, web based data repository will be established as part of their EMP and/or EEM programs? If not, the Proponent is requested to describe the likely manner in which monitoring information will be managed, analyzed and how results will be shared with stakeholders, including the GN.</li> </ul>
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<p><b>Rationale:</b></p>	<p>The GN requires further clarity from the Proponent regarding these matters as they relate directly to the GN's responsibilities under the <i>Environmental Protection Act</i> and <i>Wildlife Act</i>, along with various GN policies and guidelines. This information will also be important in the GN's consideration of a Project Certificate's terms and conditions.</p> <p>The FEIS documentation is vague with respect to the Proponent's commitment to information management, analysis and sharing related to its EMO and EEM programs. For example, in the biophysical EEM framework, the Proponent commits to developing a comprehensive and integrated environmental monitoring program that incorporates an ecosystem based approach for monitoring and management (p 1 of 9). The GN is in agreement that a comprehensive, integrated and eco-system based monitoring programs are desirable. However, the GN's review of the various monitoring studies proposed indicates that these objectives have not been achieved within the FEIS documentation; currently only stand alone initiatives have been proposed. Some individual studies are potentially duplicative (e.g. the water quality and invertebrate studies required under the MMER regulations and equivalent studies proposed separately by the Proponent).</p>
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**Appendix A – Government of Nunavut Information Requests for  
Baffinland Iron Mines Corporation, Mary River Project.**

INFORMATION REQUEST SUBMISSION FORM			
<b>Reviewer:</b>	Nunavut Research Institute	<b>Information Request #:</b>	27
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS, Volume 10, Appendix 10D-12, Attachment 5		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>In the EMP, the Proponent commits to developing “an annual summary report on the status of the terrestrial and marine environment as required in the terms and conditions of the Project Certificate” (p.37). The GN welcomes an annual report. However at this point in the EA process, the FEIS documentation is vague with respect to the overall structure and scope of these reports.</p> <p>The GN requests that the Proponent provide a proposed outline for these annual reports and a preliminary indication of their scope, including the types of information and analysis to be undertaken and summarized on an annual basis. From the GN’s perspective, it is desirable that these reports contain the following items:</p> <ul style="list-style-type: none"> <li>a) a detailed analysis of the project’s impacts on the environment;</li> <li>b) a review of corrective actions (mitigation measures implemented and an evaluation of their effectiveness) taken to address problems identified through monitoring; and.</li> <li>c) Information on how the monitoring will address local engagement and the integration of IQ in monitoring.</li> </ul>		
<b>Rationale:</b>	<p>The annual reports proposed by the Proponent appear to be the primary means by which the results of monitoring programs will be shared with stakeholders, including the GN and NRI. The purpose and scope of these reports must therefore be well understood at this point in the EA process such that the GN can determine the extent to which these reports will assist the GN in meeting its responsibilities under the <i>Environmental Protection Act</i> and <i>Wildlife Act</i>. This information will also be important in the GN’s consideration of a Project Certificate’s terms and conditions.</p>		

**Appendix A – Government of Nunavut Information Requests for  
Baffinland Iron Mines Corporation, Mary River Project.**

<b>INFORMATION REQUEST SUBMISSION FORM</b>			
<b>Reviewer:</b>	Nunavut Research Institute	<b>Information Request #:</b>	28
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	<ul style="list-style-type: none"> <li>• Baffinland Iron Mines Corporation</li> <li>• QIA</li> </ul>		
<b>References:</b>	FEIS, Volume 10, Appendix D-13		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>The GN requests that further information be provided by the Proponent and the QIA with respect to the proposed approach to Inuit engagement and the inclusion of Inuit knowledge in the following components of the biophysical EEM plan:</p> <ul style="list-style-type: none"> <li>a) aquatic (freshwater) environment;</li> <li>b) atmospheric environment; and</li> <li>c) terrestrial environment.</li> </ul> <p>Specifically the following questions must be addressed:</p> <ul style="list-style-type: none"> <li>d) how Inuit knowledge has been and will be considered in designing and selecting candidate EEM studies,</li> <li>e) how Inuit will be trained and supported to engage in various EEM studies,</li> <li>f) how efforts to involve Inuit will be evaluated over time, and</li> <li>how monitoring data and results are to be returned to interested communities?</li> </ul>		

<b>Rationale:</b>	<p>The Biophysical EEM plan states that “traditional knowledge will be a key requirement for conducting environmental effects monitoring work” (p. 4 of 9). The GN reviewers note that some information is available on these matters for the marine environment component of the EEM, but is not provided for these above noted EEM plan components. For example, the EEM plan outlines recent efforts by Baffinland and QIA to develop integrated, comprehensive community based monitoring programs for numerous issues related to the marine environment. It is unclear whether similar integrated community based monitoring programs are to be developed for the aquatic, terrestrial, and atmospheric environment. This information is important in relation to the fulfillment of Nunavut’s <i>Environmental Rights Act</i>. This information will also be important in the GN’s consideration of a Project Certificate’s terms and conditions.</p>
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**Appendix A – Government of Nunavut Information Requests for  
Baffinland Iron Mines Corporation, Mary River Project.**

<b>INFORMATION REQUEST SUBMISSION FORM</b>			
<b>Reviewer:</b>	Department of Economic Development & Transportation	<b>Information Request #:</b>	29
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS Volume 3, Section 2.7, pg. 59 FEIS Volume 3, Section 5.1.4, pg. 103 FEIS Volume 4, Section 7.4.2, pg. 154-156 DEIS Volume 1, Table 1-1.1, pg. 8 FEIS Volume 3, Table 3-1.1, pg. 4		

<b>Issue/Concern or Information Deficiency and Request:</b>	<p>In the FEIS (Vol. 3, pg. 59), the Proponent states that Boeing 737 jets “will” refuel in Iqaluit. However, on pg. 103 of Vol. 3, the Proponent indicates that refueling “may be required” and that plans will be implemented to ensure passengers deplane without causing congestion. According to Table 1-1.1 in the DEIS, 737 jets were to land at the mine site daily during the construction phase and 3 times per week during the operations phase. In the FEIS, Table 3-1.1 states that 550 Boeing 737 or C130 aircraft will land at the mine site per year during the construction phase and 365 of these aircraft will land at the mine site during the operations phase.</p> <p>If construction of the Project were to begin in 2013, travel through Iqaluit could begin as early as then. However, the Proponent has stated they do not expect that passengers will deplane into the Iqaluit terminal (Vol. 4, pg. 154).</p> <p>The GN requests the following:</p> <ul style="list-style-type: none"> <li>a) the Proponent clarify its statements regarding flights through Iqaluit by confirming the number and type of aircraft that are expected to land in Iqaluit between Ottawa and the Mine site <u>per year</u> during the construction phase, and per year during the operations phase.</li> <li>b) the Proponent clarify whether these aircraft <u>will</u> refuel in Iqaluit during their flight between Ottawa and the mine site.</li> <li>c) the Proponent provide an anticipated number of passengers to land and deplane in Iqaluit for each flight they expect to land in Iqaluit, and the likely time of day of each flight.</li> <li>d) the Proponent clearly indicate what facilities and services they intend to use during the construction phase and once the project is operational which are currently available at the Iqaluit Airport. If the Proponent does not intend to access current facilities and services, the GN requests more detail on how the Proponent will refuel and deplane without using the facilities and resources currently available at the Iqaluit Airport (ex. where passengers will wait during refueling; when additional facilities will be available; what additional equipment and fuel will the Proponent be responsible for independent of the Iqaluit Airport and its services; etc.).</li> </ul>
<b>Rationale:</b>	<p>The Department of ED&amp;T - Iqaluit International Airport Division - is responsible for the safe, efficient and effective management and operation of the Iqaluit Airport. The information is requested so that during our review we can determine the costs and possible demands on the Iqaluit Airport if a daily flight will be refueling in Iqaluit.</p>

**Appendix A – Government of Nunavut Information Requests for  
Baffinland Iron Mines Corporation, Mary River Project.**

<b>INFORMATION REQUEST SUBMISSION FORM</b>			
<b>Reviewer:</b>	Department of Economic Development & Transportation	<b>Information Request #:</b>	30
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS Volume 4, Section 15 FEIS Volume 10, Appendix 10F-1 FEIS Volume 10, Appendix 10F-3, Section 13 NIRB Pre-Hearing Conference Decision Report – December 9, 2011		

<b>Issue/Concern or Information Deficiency and Request:</b>	<p>The Pre-Hearing Conference Decision Report Commitment #288 requested that the Proponent develop a conceptual monitoring framework by working collaboratively with QIA, GN, and AANDC and to consider human health and wellbeing, social services, education, employment, demographics, lifskills, substance abuse, crime, food security and land use in this framework. The Proponent has presented this framework in Vol. 4, Section 15 and again in Appendix 10F-3, Section 13. However, the role of the Q-SEMC has not been made clear. Rather, the Proponent has suggested that they will participate with the Q-SEMC “to the extent this is seen to be useful” (Vol. 4, pg. 250). The Proponent has also suggested that collaboration is essential for monitoring, as various agencies and stakeholders collect relevant information that are of interest to each monitoring agency (Vol. 4, pg. 252). To this, the GN agrees. However, the Proponent does not appear to commit to the Q-SEMC as the most obvious forum for this information-sharing and collaboration. Rather, the Proponent appears to suggest that the Q-SEMC is a parallel monitoring initiative to which they will “From time to time” participate with and prepare presentations for (Vol. 4, pg. 258).</p> <p>Furthermore, a comprehensive socio-economic monitoring program should incorporate the monitoring of human health and wellbeing, social services, education, employment, demographics, life skills, substance abuse, crime, food security, land use and harvesting, and associated culture and skills, as stated in Commitment #288. The GN understands that many of these areas are not within the responsibility of the Proponent to monitor; as such, an information-sharing forum should exist to streamline efforts (such as project-specific, community-based, academically supported, and data generated by government) so that monitoring initiatives can come together and stakeholders can discuss results and issues of local, regional and project-specific concern. The Q-SEMC is the most obvious forum for this.</p> <p>The GN requests that:</p> <ul style="list-style-type: none"> <li>a) the proponent clearly state their understanding of the role of the Q-SEMC with respect to their project-specific monitoring framework.</li> <li>b) the Proponent indicate whether they will actively participate in each Q-SEMC meeting and their anticipated role in these meetings.</li> <li>c) that the Proponent provide a socio-economic monitoring framework that incorporates the considerations identified in Commitment #288.</li> </ul>
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<b>Rationale:</b>	<p>The Pre-Hearing Conference Decision Report Commitment #288 was not fulfilled to the satisfaction of the GN.</p> <p>In 2007, the GN and INAC (now AANDC) established Regional SEMCs to satisfy the requirements by NIRB to monitor socio-economic impacts and benefits of major resource development projects. This approach was adopted in order to streamline monitoring efforts through efficiency and consistency, to ensure comparability, traceability and scalability of data, and to provide a venue that supports impacted and interested stakeholders to take part in monitoring efforts including valuable community insight. The GN's commitment to this approach has not changed, and we continue to see value in a single regional monitoring committee that contains project-specific and community-based components. The GN acts as the Chair to each regional Committee, and is responsible for regional socio-economic monitoring in the territory. In addition, the GN provides the financial support for community representatives to participate at each meeting, and covers the logistical costs of hosting meetings. The Department of ED&amp;T has been able to secure funding for greater consistency in meetings, and has recently hired staff to support the Committees. The GN views the regional SEMCs as logical information hubs where government data, project-specific monitoring, other monitoring initiatives and community insight can be shared collectively. Such information-sharing has already proven to foster comprehensive discussion among Committee members, and provides a much more comprehensive report to both NIRB and government decision-makers by incorporating project-specific and government owned information. The GN expects that the Q-SEMC will remain the focal point for socio-economic monitoring for the region, including for the Proponent. By this, the Q-SEMC should act as an information hub that allows various individual monitoring programs, including project-specific monitoring, to flow into and be reported through.</p>
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Baffinland Iron Mines Corporation, Mary River Project.**

<b>INFORMATION REQUEST SUBMISSION FORM</b>			
<b>Reviewer:</b>	Department of Economic Development & Transportation	<b>Information Request #:</b>	31
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS Volume 4, Section 2.4, pg. 21 FEIS Volume 4, Section 15 FEIS Volume 10, Appendix 10F-1, Section 6 NIRB Pre-Hearing Conference Decision Report – December 9, 2011		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>The Pre-Hearing Conference Decision Report Commitment #289 requested that the Proponent describe in the FEIS how information related to the reasons employees terminate their employment with the Project will be monitored.</p> <p>In App. 10F-1, the Proponent identifies a complaints management system, and specifically lists types and categories of complaints (pg. 27), including complaints related to economic, social, and health effects. The Proponent identifies that employees traveling between home communities and the Project site will not overnight in Iqaluit unless necessary. Weather may require spending nights in Iqaluit on a sporadic basis, but so too may flight schedules that require a layover. It will be important to understand how often these instances occur, and whether local resources are sufficient to accommodate them.</p> <p>The GN requests:</p> <ul style="list-style-type: none"> <li>a) the Proponent describe how reasons for employee termination will be monitored.</li> <li>b) the Proponent clarify whether the information collected from the complaints management system will be shared (using appropriate discretion) with the Q-SEMC and relevant government departments.</li> <li>c) the Proponent review the experience of weather related delays at the Iqaluit airport and provide an estimate of the number of instances that employees might be required to spend the night(s) in Iqaluit.</li> <li>d) The Proponent provide an assessment of the availability of temporary accommodation for employees on delayed flights</li> <li>e) The Proponent describe how they intend to monitor the number of instances employees will spend the night in Iqaluit when traveling to and from the Project site and whether there are any mechanisms contemplated to address unanticipated problems with the airport, the City of Iqaluit and/or the RCMP.</li> </ul>		

<b>Rationale:</b>	<p>The Proponent commits to monitoring the reasons for employee turnover in Vol. 4, Section 15.3.1 and presents a broad approach to monitoring in Section 15.5. However, the Proponent does not describe how they will monitor turnover, as requested in Commitment #289. For other projects, information regarding the reasons for termination has been collected on a voluntary basis or has been anecdotal. Understanding these reasons for termination is important to the GN where reasons are related to social issues or a lack of services that could support employment (such as community daycares).</p> <p>Many of the complaint categories identified by the Proponent are relevant to government departments responsible for local economic development and health and social services. It would be valuable to receive the Proponent's perspective on any of these issues, as informed through their complaints collection process.</p> <p>Monitoring instances where employees need to overnight in Iqaluit (due to weather, flight schedules, or any other factor within the company's ability to monitor) will assist in determining whether an impact to Iqaluit is occurring more frequently than anticipated and whether it is significant enough to warrant further mitigation.</p>
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**Appendix A – Government of Nunavut Information Requests for  
Baffinland Iron Mines Corporation, Mary River Project.**

INFORMATION REQUEST SUBMISSION FORM			
<b>Reviewer:</b>	Department of Economic Development & Transportation	<b>Information Request #:</b>	32
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS Volume 4, Section 15 FEIS Volume 3, Appendix 3B, Attachment 10, Section 9, pg. 33 FEIS Volume 10, Appendix 10F-1, Table 4.2, pg. 24		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>Project-specific monitoring should continue beyond closure of the mine. The Proponent states that stakeholder engagement activities will include liaising with communities and stakeholders 3-5 years prior to planned closure and working with local government and community leaders in anticipation of opportunities and impacts regarding closure (App. 10F-1, Table 4.2). However, these activities do not appear to address temporary closures or extend beyond the life of the mine and into the closure and reclamation period. Further, there does not appear to be any commitment to socio-economic monitoring beyond the life of the mine and into the closure and reclamation period.</p> <p>The GN requests that:</p> <ul style="list-style-type: none"> <li>a) the Proponent indicate whether it will liaise with communities and stakeholders during both temporary or permanent closure of the Project. If so, for how long will this commitment be for?</li> <li>b) the Proponent indicate whether it will continue socio-economic monitoring during temporary or permanent closure/post-closure. If so, for how long will this commitment be for?</li> </ul>		

<b>Rationale:</b>	<p>Monitoring during closure and post-closure is as important as during the life of the Project. The Proponent has conducted an assessment of the socio-economic effects of the project during these phases and therefore, should consider monitoring to gauge their accuracy and the effectiveness of mitigation measures applied during these phases.</p> <p>In the same way that the company has committed to 5 years of post-closure biophysical monitoring to verify that their reclamation objectives have been met successfully, post-closure objectives and associated monitoring should also be in place for the socio-economic environment. Specifically, in the transition from operations to closure and reclamation activities, the Proponent should be collecting information on project employment and measures to help individuals prepare for unemployment. Monitoring will inform government and other stakeholders on the overall health and well-being of the region and its residents post-Project. Therefore, active participation by the Proponent to inform the public of their project even during the closure phase and to monitor socio-economic effects of the project in the region extend beyond the immediate life of the project.</p>
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**Appendix A – Government of Nunavut Information Requests for  
Baffinland Iron Mines Corporation, Mary River Project.**

INFORMATION REQUEST SUBMISSION FORM			
<b>Reviewer:</b>	Department of Economic Development & Transportation	<b>Information Request #:</b>	33
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS Volume 10, Appendix 10D-8, Sections 1.3; 2; 3.2.5; and 6.3		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>The Proponent acknowledges that the Milne Tote road is a public road (section 1.3) and that the rail service road will likely be used by the public (S. 1.3 and S. 2). The Proponent has stated that extreme care by project staff needs to be taken when non-project individuals are sighted along these roads as they may not be aware of the hazards. Any sightings of non-project individuals will be reported and logged (S. 2.3.5).</p> <p>The GN requests:</p> <ul style="list-style-type: none"> <li>a) The Proponent state what the objective of such data collection is and the contingency measures or adaptive management measures that will be put in place if the public use of roads be considered problematic.</li> <li>b) The Proponent clarify whether any additional efforts by Baffinland will be taken to communicate road safety measures to the public in order to minimize adverse interactions between the public and project on these roads. If yes, when such measure would be undertaken.</li> </ul>		
<b>Rationale:</b>	<p>The GN acknowledges that operations and maintenance of project roads are the responsibility of the Proponent during the life of the project. Therefore, the GN understands that it is the proponent's responsibility to ensure public safety where project infrastructure and public land use will interact. Without additional efforts by the Proponent, the GN may have to take on this responsibility to ensure public safety and wellbeing, causing additional costs to the GN.</p>		

**Appendix A – Government of Nunavut Information Requests for  
Baffinland Iron Mines Corporation, Mary River Project.**

<b>INFORMATION REQUEST SUBMISSION FORM</b>			
<b>Reviewer:</b>	Department of Economic Development & Transportation	<b>Information Request #:</b>	34
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS Volume 10, Appendix 10D-9.1, Section 3.5, pg. 10		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>The GN notes that the proponent plans to inform communities on rail safety through the “Operation Lifesaver” program, which will be adapted to Nunavut and brought to communities near the project (S. 3.5, pg. 10).</p> <p>The GN requests</p> <ul style="list-style-type: none"> <li>a) the Proponent clarify how often this program will be implemented in communities.</li> <li>b) The proponent provide an approximate timeline for when the program may begin to be implemented in communities.</li> </ul>		
<b>Rationale:</b>	The GN acknowledges that through this program, informing the public on rail safety by the proponent is likely to be achieved. However, we wish to ensure that timely use of the program takes place, so that once the railway is operational, local land users will be adequately informed of the risks.		

**Appendix A – Government of Nunavut Information Requests for  
Baffinland Iron Mines Corporation, Mary River Project.**

INFORMATION REQUEST SUBMISSION FORM			
<b>Reviewer:</b>	Department of Economic Development & Transportation	<b>Information Request #:</b>	35
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS Volume 4, Section 7.3 and 7.5 FEIS Volume 10, Appendix 10F-3, S. 6.1.1, pg. 13 FEIS Volume 10, Appendix 10F-3, S. 6.6, pg. 16 NIRB Public Info Meetings – Summary Report, June-July 2011		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>The Proponent commits to cooperating with municipalities to identify areas of alignment between the labour force skill sets needed by communities and skills needed by the project (App. 10F-3, pg. 16). Furthermore, as part of their recruitment strategy, Baffinland will establish a search/assessment database that will list all Inuit candidates to identify individuals qualified for available jobs; and will track Inuit who are pursuing education and training to become job ready (App. 10F-3, pg. 13). The Proponent concludes that negative effects of the Project on Hamlet recruitment and retention have a high probability of occurring (Vol. 4, pg. 153), though is not found to be significant because the effect will have a short duration (Vol. 4, pg. 157).</p> <p>The GN requests:</p> <ul style="list-style-type: none"> <li>a) the Proponent indicate whether the search and assessment database will be shared regularly with Hamlets (such as with the SAO or EDO).</li> <li>b) the Proponent provide further details on how it will work with Hamlets to identify where competition for similar job skills exists.</li> <li>c) The Proponent indicate what adaptive management measures might be considered by the Proponent should Hamlets experience recruitment and retention problems that can be attributed to the Project ?</li> </ul>		
<b>Rationale:</b>	<p>The GN has been encouraged to meet with Hamlets to discuss the socio-economic impacts and benefits of the project on communities and the related mitigation and monitoring plans contained in the FEIS. Furthermore, consultation in 2011 has identified a concern regarding a lack of available qualified staff within Hamlets due to competition with the project. Determining how the Proponent will work with Hamlets is essential for the GN to discuss impacts and mitigation with communities and to represent community concerns during the technical review.</p>		



**Appendix A – Government of Nunavut Information Requests for  
Baffinland Iron Mines Corporation, Mary River Project.**

<b>INFORMATION REQUEST SUBMISSION FORM</b>			
<b>Reviewer:</b>	Department of Economic Development & Transportation	<b>Information Request #:</b>	36
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS, Volume 4, Appendix 4B, pg. 2 FEIS, Volume 4, Appendix 4B, pg. ii and 8		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>Good economic analysis is the basis for understanding the economic development benefits of a project, including the net economic benefit to the GN. In the economic impact model (App. 4B, pg. 2), the Proponent has estimated that profit tax payments are anticipated in the amount of \$2.764 billion over the duration of the project. This would amount to at least \$100 million yearly on average.</p> <p>It is unclear how the Proponent has determined that Government Current Expenditure in 2019 will be \$4 million when compared to the \$4.3 million of 2013 and the \$111 million in 2022 (App. 4B, pg. 8). For instance, the production (GDP) increase of 30% between 2019 and 2022 can hardly explain the 28 fold jump in “Government Current Expenditure,” at least intuitively. Considering the context, no production and low construction is expected in 2013 versus production hitting almost 85% of capacity in 2019. In such a situation, how can we have this similar level of government expenditure, especially when we witness this same item going up 28 times in the following 3 years while production goes up by only 30%.</p> <p>The GN requests:</p> <ul style="list-style-type: none"> <li>a) the Proponent provide a schedule of the payments it anticipates will be paid to the GN based on its anticipated revenues.</li> <li>b) the Proponent identify when corporate profit payments will be made to the GN, thus matching the level of information provided for royalties to be paid to NTI.</li> <li>c) the Proponent specify the content of the line “Government Current Expenditure” and explain its assumptions and the wide variations, especially for the 2013-2022 period.</li> </ul>		

<b>Rationale:</b>	The GN needs to understand the full economic impact of the project such that it can determine whether economic development will be helped or hindered at various stages of the mine life and, therefore, what the GN will need to do to ensure sustainable economic development. The GN anticipates a rise in the costs incurred to provide services to current and potentially new residents in the LSA. Thus, it is the duty of the GN to insure that sufficient financial resources will accrue in a timely manner in order to at least match the government expenditures attributable to the project.
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**Appendix A – Government of Nunavut Information Requests for  
Baffinland Iron Mines Corporation, Mary River Project.**

INFORMATION REQUEST SUBMISSION FORM			
<b>Reviewer:</b>	Department of Finance	<b>Information Request #:</b>	37
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS Volume 4, Section 4.4, p. 63.		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>Additional information regarding the Project expenditures on payroll are requested such that the GN Department of Finance can determine and/or confirm the magnitude of revenues the GN could anticipate from the Project and the significance of likely effects on the GN. Specifically, The GN requests:</p> <ul style="list-style-type: none"> <li>a) The Proponent provide information on how much (\$) it expects to pay per year, on average, for employees in each of the three occupational classes (B+, C, and D) it identifies in Section 4.4 of the FEIS (Vol 4, p. 63). <ul style="list-style-type: none"> <li>• As further guidance regarding GN's expectations, general estimates are acceptable and can be presented as either annual figures (e.g. "we expect B+ occupations will earn about \$100,000 per year") or in hourly wages (e.g., "we expect individuals hired in C level occupations will earn about \$45/hour"). The Proponent can also present wages as a \$10,000 range (e.g., "we expect most people working in a D level occupation would earn between \$40,000 and \$50,000, if they worked for a full year").</li> </ul> </li> <li>b) The Proponent provide an estimate of the <u>total</u> amount of wages/salaries the proponent expects to pay each year during development and operation (e.g., during operations, we expect to pay about \$80 million in wages each year").</li> </ul>		

<b>Rationale:</b>	<p>To determine and/or confirm the magnitude of revenues the GN could anticipated from the Project and properly manage its fiscal resources, the GN needs to accurately estimate the tax revenues it will receive each year. To design effective policies and programs related to income (e.g., tax policies, social assistance programs, poverty reduction initiatives, etc.) we also need to understand how the Proponent's project may impact the personal income of individuals and families in the region.</p> <p>The Proponent currently estimates what the GN will receive through payroll and personal income taxes (about \$4 million per year during construction, and about \$2 million per year during operations). This is a helpful start. We would like to better understand the calculations behind these estimates, which depend not only on the quantity of labour (number of employees or hours worked, which the firm helpfully provides) but also on the amount paid to each employee, which is currently lacking.</p>
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Baffinland Iron Mines Corporation, Mary River Project.**

INFORMATION REQUEST SUBMISSION FORM			
<b>Reviewer:</b>	Department of Finance	<b>Information Request #:</b>	38
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS Volume 1 pg.11 Table 1-2.1 Key Project Facts FEIS Volume 4 pg. 231 Fuel Taxes 12.3.1 Project Effects		
<b>Issue/Concern or Information Deficiency and Request:</b>	The GN requests that the Proponent estimate the quantity of fuel it will use each year to operate its railway.		
<b>Rationale:</b>	<p>The <i>Petroleum Products Tax Act</i> imposes different tax rates for different types of fuel. To accurately estimate the revenue impact the project will have on the GN through fuel taxes, we need to understand how much of each type of fuel the Proponent expects to use each year. The Proponent has already indicated the amount of fuel it expects to use for three fuel types: motive, non-motive, and aviation. While this break down is helpful, the Proponent has not specified how much fuel it expects to use to operate its railway. Under the <i>Petroleum Products Tax Act</i> (Section 2.d), locomotive fuel may be subject to a different tax rate than other types of diesel. It is therefore important we understand how much fuel will be used to power the railway.</p>		

**Appendix A – Government of Nunavut Information Requests for  
Baffinland Iron Mines Corporation, Mary River Project.**

INFORMATION REQUEST SUBMISSION FORM			
<b>Reviewer:</b>	Department of Health & Social Services	<b>Information Request #:</b>	39
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS Volume 4, Section 2.3 and 2.4 NIRB Pre-Hearing Conference Decision Report – December 9, 2011		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>The Proponent notes that in order to avoid large flows of in-migration it will provide transportation between southern point –of –hire community and the Project site (Vol. 4, pg. 14). As noted in Vol. 4, pg. 20 <i>“There is potential that some individuals from communities where transportation to the mine is not provided by BIM will choose to relocate, rather than bearing the cost in time and/or money of travel from their home community to a transportation node.”</i> The Proponent suggests that challenges of the current housing market may prevent potential employees from moving to point-of-hire communities or to Iqaluit (Vol. 4, pg. 20-21). Further, the Proponent acknowledges that the extremely tight housing market may lead to increased crowding and social challenges (Vol. 4, pg. 22). While the company does note that the magnitude and effect of immigration is difficult to predict this does not mean that there should not be a plan to mitigate and monitor migration as a result of the project.</p> <p>The GN requests:</p> <ul style="list-style-type: none"> <li>a) the Proponent explain whether and how they will monitor the relocation of employees and their families due to employment with the Project.</li> <li>b) the Proponent provide their plans to mitigate the effects caused by those employees who choose to migrate.</li> <li>c) The Proponent provide a professional opinion as to what percentage of in-migration into a community would have to occur before the mitigation is necessary.</li> <li>d) The Proponent indicate the types of adaptive management measures that could be undertaken by the Proponent to mitigate any effect their employees and families who relocate to Nunavut will have on the current housing market. For example, will the company consider providing or constructing housing units for employees or providing additional supporting facilities in communities that are affected?</li> </ul>		

<b>Rational:</b>	<p>The Pre-Hearing Conference Decision Report Commitment #300 requests that the Proponent include in the FEIS a consideration of the effects of potential in-migration into Iqaluit from outside the local study area, including effects on communities experiencing out-migration and effects on local housing issues. Migration due to the presence of the Project could have an effect on population demographics and stability with the potential of adverse effects (increased demand on current infrastructure such as housing, health centers, and schools; sense of autonomy of members of the community; shift in cultural and social norms; use of the Inuit Language; etc). Further, overcrowded housing and homelessness impacts both the health and wellbeing of Nunavummiut. The GN is responsible for the health and wellbeing of both Inuit beneficiaries and non beneficiaries. In addition, the GN is not set up to receive direct royalties or the benefits of IIBAs (which are with local Inuit Organizations). Therefore, in-migration into any of the communities or the City of Iqaluit will impact the cost of providing government facilities, programs and services. The information requested above is required to satisfy Commitment #300 so the GN can make a determination as to the effectiveness of mitigation and the significance of effects.</p>
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**Appendix A – Government of Nunavut Information Requests for  
Baffinland Iron Mines Corporation, Mary River Project.**

<b>INFORMATION REQUEST SUBMISSION FORM</b>			
<b>Reviewer:</b>	Department of Health & Social Services	<b>Information Request #:</b>	40
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS Volume 4, Section 6.3.2, pg. 123-124 FEIS Volume 10, Appendix 10F-3		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>In order to mitigate the adverse effects on health and wellbeing the Proponent states it “will implement an Employee and Family Assistance Program (EFAP) for workers and their family members” (Vol. 4, pg. 123).</p> <p>The GN requests that:</p> <ul style="list-style-type: none"> <li>a) the Proponent provide additional details regarding the specific objectives, timing and method of implementation for the EFAP</li> <li>b) The Proponent provide examples of where this plan has been implemented successfully by the Proponent or others and/or the factors that would ensure successful implementation in Nunavut.</li> </ul>		
<b>Rationale:</b>	<p>The company does not provide details of the EFAP and do not provide supporting evidence for their rationale. The GN is responsible for the health and wellbeing of Nunavummiut and requires this level of detail in order to determine if we are confident in the mitigation proposed by the Proponent. This information is required for the GN to make a determination as to the effectiveness of mitigation and the significance of effects.</p>		



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INFORMATION REQUEST SUBMISSION FORM			
<b>Reviewer:</b>	Department of Health & Social Services	<b>Information Request #:</b>	41
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation Qikiqtani Inuit Association		
<b>References:</b>	FEIS Volume 4, Section 6.3.2, pg. 123-124 FEIS Volume 10, Appendix 10F-3 QIA website : <a href="http://www.qia.ca">www.qia.ca</a>		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>The Proponent has recognized that challenges will arise from a fly-in/fly-out employment rotation (Vol. 4, pg. 123) and aims to mitigate the potential adverse effects on health and wellbeing due to the Project. In order to mitigate these adverse effects, the Proponent states it will “contribute to the <i>Ilagiiktunut Nunalinnullu Pivalliajutisait Kiinaujat</i> (INPK) community projects fund” (Vol. 4, pg. 123). This fund is part of a private agreement with QIA, who according to their website (<a href="http://www.qia.ca">www.qia.ca</a>) “is aimed at representing the interests of the Inuit of the Baffin Region, High Arctic and Belcher Islands”. The GN respects QIA’s efforts to reduce the potential adverse impacts to Inuit due to the project. However, it is the GN who is responsible for the health and wellbeing of all Nunavummiut.</p> <p>The GN requests:</p> <ul style="list-style-type: none"> <li>a) the Proponent provide a mitigation plan for the effects the fly-in/fly-out rotation system on health and wellness of all Nunavummiut. If no such plan is anticipated, the Proponent should provide a rationale</li> <li>b) The Proponent and the QIA describe any measures that would be taken as part of the Inuit Impact Benefit Agreement or other agreements, or safeguards that would be in place, to mitigate effects on the health and wellness of all Nunavummiut,</li> <li>c) The Proponent and the QIA describe any measures that would be taken as part of the Inuit Impact Benefit Agreement or other agreements, or safeguards that would be in place, to mitigate effects on the GN in terms of costs on the Health and Social Services facilities, resources, programs and services upon which all Nunavummiut rely.</li> </ul>		

<b>Rationale:</b>	The private agreement that the Proponent has with QIA should not be seen or accepted as a form of mitigation for potential adverse effects to Nunavummiut. This reference to funding contributions does not mitigate the effects on Health and Social Services facilities, resources, programs and services or the Nunavummiut population. This information is required for the GN to make a determination as to the effectiveness of mitigation and the significance of effects.
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**Appendix A – Government of Nunavut Information Requests for  
Baffinland Iron Mines Corporation, Mary River Project.**

INFORMATION REQUEST SUBMISSION FORM			
<b>Reviewer:</b>	Department of Justice	<b>Information Request #:</b>	42
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS Volume 4, Section 6.4.3, pg. 134 FEIS Volume 10, Appendix 10D-10, Section 4.4, pg. 32 NIRB Pre-Hearing Conference Decision Report – December 9, 2011		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>The possibility that illegal substances may enter Project sites through marine shipping routes has been identified by the Proponent. The risk for substances importation has not been evaluated but rather presented as a possibility. The RCMP and the Department of Justice (DOJ) have evaluated the risk of importation and rated this risk as “high”. The mitigation measure proposed in Volume 10, Appendix 10D-10 falls short of offering a detailed protocol on how effective searches will be conducted to ensure no importation of substances will occur.</p> <p>The GN requests:</p> <ul style="list-style-type: none"> <li>a) the Proponent complete and provide an analysis on the risk of substance importation via all potential direct modes of transportation to the mine site and via indirect means (e.g., through communities).</li> <li>b) the Proponent provide a detailed protocol to control substance importation.</li> <li>c) the Proponent confirm whether or not it will monitor instances of importation and share this information with the Q-SEMC. If not, the Proponent should provide a rationale.</li> </ul>		

<b>Rationale:</b>	<p>The Pre-Hearing Conference Decision Report Commitment #295 requests the Proponent to identify relevant information to be shared with the RCMP and/or GN-Department of Justice with respect to shipping and security monitoring. The information requested is required in order for the GN to identify as accurately as possible, based on historical data and past projects, the risk associated with substance importation and maritime transportation. This information is required for the GN to make a determination as to the effectiveness of mitigation and the significance of effects. Under the Nunavut Policing Agreement and the <i>Department of Justice Act R.S.N.W.T. 1988,c.97(Supp.)</i>, the Minister of Justice is <i>ex officio</i> attorney general and responsible for the provision of policing services in the territory. Crime prevention is within the mandate of the DOJ and RCMP, and monitoring will help the Proponent to bring corrective action to its security protocol when required and to assist the DOJ and the RCMP in fulfilling its mandate in crime prevention.</p>
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**Appendix A – Government of Nunavut Information Requests for  
Baffinland Iron Mines Corporation, Mary River Project.**

INFORMATION REQUEST SUBMISSION FORM			
<b>Reviewer:</b>	Department of Justice	<b>Information Request #:</b>	43
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS Volume 4, Section 6.3.2		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>The proponent recognizes that the effectiveness of all mitigation initiatives may be enhanced through monitoring for effectiveness, and that this monitoring may require the sharing of data and information between multiple parties. Highly sensitive information requires a high level of confidentiality. For example, sharing information involving organized crime and policing techniques to investigate crime elements is very sensitive. The sharing of relevant and sensitive data between the GN, associated agencies such as the RCMP, and the Proponent requires a formal protocol and the development of terms of reference due to the sensitive nature of the data.</p> <p>The GN requests:</p> <p>a) the Proponent confirm whether or not they have plans to enter into a formal agreement with relevant GN departments, including the RCMP, on data sharing. If not, the Proponent is requested to provide a rationale.</p>		
<b>Rationale:</b>	<p>The sharing of relevant and sensitive data is required between the GN and its associated agencies such as the RCMP, and the Proponent in order to adequately respond to adverse impacts through adaptive management. This information is required for the GN to make a determination as to the effectiveness of mitigation and the significance of effects.</p>		

**Appendix A – Government of Nunavut Information Requests for  
Baffinland Iron Mines Corporation, Mary River Project.**

INFORMATION REQUEST SUBMISSION FORM			
<b>Reviewer:</b>	Department of Justice	<b>Information Request #:</b>	44
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS Volume 10, Section 6.3, pg. 35 NIRB Pre-Hearing Conference Decision Report – December 9, 2011		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>In response to the Pre-Hearing Conference Decision Report Commitment #320, the Proponent states that it will be self sufficient for Search and Rescue operations (SAR) and response to environmental emergencies as it relates to Mary River Project activities, but will share relevant information with the RCMP and GN Department of Justice. The success of emergency operations often resides in the timely response and coordinated execution.</p> <p>The GN requests that :</p> <p>a) The Proponent confirm whether or not they have plans to enter into a formal MOU Emergency Response and SAR operation with the DOJ and the RCMP.</p>		
<b>Rationale:</b>	The RCMP has primary responsibility for investigating incidents involving lost or overdue persons on land and inland water. Clear understanding of roles and responsibilities is essential to adequately respond to the safety needs of the population. The GN requires this information for the GN-DOJ and RCMP to make a determination as to the effectiveness of mitigation and the significance of effects.		

**Appendix A – Government of Nunavut Information Requests for  
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<b>INFORMATION REQUEST SUBMISSION FORM</b>			
<b>Reviewer:</b>	Department of Justice	<b>Information Request #:</b>	45
<b>Information Request From:</b>	Government of Nunavut		
<b>Information Request For:</b>	Baffinland Iron Mines Corporation		
<b>References:</b>	FEIS Volume 10, Section 6.3, pg. 35		
<b>Issue/Concern or Information Deficiency and Request:</b>	<p>The Proponent states that it will be self sufficient for Search and Rescue operations (SAR) and response to environmental emergencies as it relates to Mary River Project activities, and will have at its disposal the appropriate equipment and resources to respond to SAR operations.</p> <p>The GN requests that:</p> <ul style="list-style-type: none"> <li>a) the Proponent provide additional information on the type of Search and Rescue equipment anticipated to be at their disposal, the location/base for the equipment, and the number of qualified resources the Proponent plans to employ to conduct a SAR operation.</li> <li>b) The Proponent confirm whether Search and Rescue operations would be contracted out to a third-party. If yes, provide details regarding the safeguards that would be in place to ensure an adequate response.</li> </ul>		
<b>Rationale:</b>	The information to be provided by the Proponent will assist the DOJ and the RCMP in determining the appropriateness of entering into discussion with the Proponent in view of sharing resources involved in SAR operations. This information is required for the GN to make a determination as to the effectiveness of mitigation and the significance of effects.		