



Environment
Canada

Environnement
Canada

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June 13, 2014

Our file: 6100 000 011 / 004
NIRB File: 08MN053

Ryan Barry
Executive Director,
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay,
NU, X0B 0C0

Via email: info@nirb.ca

Re: 08MN053 - 2013 Annual Report for the Mary River Project

Environment Canada (EC) has reviewed the 2013 Annual Report prepared by Baffinland Iron Mines Co. (March 2014) for the Mary River project. Environment Canada provides the following comment for NIRB's consideration.

Subject: Marine Environment Monitoring

Reference: Appendix N.2 (Shipping and Marine Wildlife Management Plan), Section 7.1 (Environmental Effects Monitoring), Page 65; Appendix J (Milne Inlet Marine Baseline 2013); Appendix R (Steensby Inlet – Marine Baseline Studies 2012); 2013 Annual Monitoring Report, Section 7.5 (Marine Environment Monitoring), Page 91

Issue: Absence of detail regarding overall marine environment monitoring

Comment: Insufficient information is provided on the monitoring of the marine environment. Appendix N.2 states: "Baffinland will carry out monitoring of the effects of shipping as set out in the marine section of the Environmental Effects Monitoring Plan approved by the Government of Canada and the Government of Nunavut, on a regular basis, the Marine Environmental Working Group will review and recommend amendments to the Environmental Effects Monitoring Program as it pertains to the marine environment." Appendices J and R provide details regarding marine baseline studies for Milne Inlet and Steensby Inlet, respectively. However it is unclear how the data generated by these baseline studies will fit in with the overall marine monitoring plan. Section 7.5 (Marine Environment Monitoring) of the 2013 Annual Monitoring Report states that there was no marine environment monitoring results to report on for 2013.

Environment Canada agrees with section 7.5.4 of the annual report where Baffinland states that "At this early stage in Project- environment interactions, the focus is on strengthening baseline (background knowledge on natural variability) and on refinement of study designs. Supplemental baseline surveys and pilot scale monitoring both serve these purposes" However Environment Canada is of the opinion that this is also the time to ensure that sufficient planning has gone into collecting the physical and ecological baselines necessary to support later assessment of impacts. Therefore EC requests that Baffinland provide an

outline the overall marine environment monitoring plan, so that it can be reviewed to ensure that there are no gaps.

Environment Canada thanks the NIRB for the opportunity to participate in this review and to comment on the 2013 Annual Report.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'MDL', is positioned above the typed name and title.

Mark Dahl
Environmental Assessment Officer
Prairie and Northern Region
Environment Canada

cc: C. Ogilvie, Head EA-North, Environment Canada