



April 8, 2019

Ryan Barry
Executive Director
Nunavut Impact Review Board
PO Box 1360
Cambridge Bay, NU
X0B 0C0
via email: rbarry@nirb.ca

Re: NIRB File No. 08MN053: Need for Additional Information for Baffinland's "Phase 2 Proposal"

Dear Mr. Barry,

We are writing in response to the letter filed with the Nunavut Impact Review Board (**NIRB**) on April 5, 2019 from the Northern Major Projects Office (**NMPO**). In that letter, NMPO has raised questions regarding certain additional information that will be submitted by Baffinland during the NIRB process as well as opportunities for comment and review by the federal agencies on these materials.

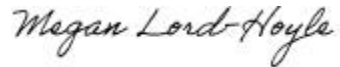
Baffinland has prepared the attached tables which set out the anticipated submission dates for the materials committed to in Baffinland's responses filed on March 25, 2019 and in the Disposition Table filed by Baffinland on April 6, 2019 (which will be further updated during the upcoming NIRB technical meetings April 8-10, 2019). These tables are organized as follows:

- Table 1: Specific items listed in the April 5, 2019 NMPO Letter;
- Table 2: Updated Management and Monitoring Plans; and
- Table 3: Other items listed in Baffinland's Disposition Table.

Specifically with respect to the NMPO's request for a meeting on the Table 1 items, Baffinland suggests that an additional day may be added on to the working group meetings that are scheduled to take place on June 10, 2019 since all the appropriate parties will be present, including NIRB staff. Alternatively, should the NIRB elect to do so Baffinland is also open to participating in technical meetings held via other formats, such as teleconference.

Baffinland is confident that any NIRB required review, comment periods and meetings can be completed within the period prior to the public hearings scheduled for September 2019. Baffinland appreciates the continued engagement of the federal agencies as well as the other reviewers and looks forward to productive meetings in Iqaluit this week.

Sincerely,



Megan Lord-Hoyle
Director Corporate Sustainability

cc.

Lisa Dyer, Director General, Northern Major Projects Office
Bernie MacIsaac, Deputy Minister Economic Development and Transportation, Government of Nunavut
PJ Akeegok, President, Qikiqtani Inuit Association
Andrew Dumbrille, Senior Specialist, Sustainable Shipping, WWF-Canada
David Rochette, Regional Director General, Crown Indigenous Relations and Northern Affairs Canada
Mary Taylor, Environmental Protection Operations Directorate Environment and Climate Change Canada
C. Thomas Hoggarth, Regional Director, Ecosystems Management Central and Arctic Region, Fisheries and Oceans Canada
Shari Currie, Regional Director General, Prairie and Northern Region, Transport Canada
Patrick O'Neill, Director General, Explosives, Safety and Security Branch, Natural Resources Canada
Chantal Roberge, Director, Environmental Health and Internationally Protected Persons, Health Canada
Jenna Boon, Field Unit Superintendent, Nunavut Field Unit, Parks Canada
Mark Hopkins, Director General, Crown Indigenous Relations and Northern Affairs

Summary of Additional Information to be Provided by Baffinland

Table 1: Items listed in the April 5, 2019 NMPO Letter

Item #	Description of Item	ID#	Baffinland Submission Date*	Comments
1	Cumulative Effects Assessment of Project Alternatives, Addendum	CIRNAC 18 GN 15 GN 26 PC 03	May 13, 2019	A cumulative effects assessment was provided as TSD 27 of the original submission. The addendum is to reflect additional scope as requested through technical comments.
2	Icebreaking assessment	DFO 3.3.1 DFO 3.4.1 DFO 3.4.2 PC 02 QIA 51 GN 22 GN 24	May 13, 2019	Assessment under revision to: <ul style="list-style-type: none"> include additional VECs (sea ice, marine environment, marine birds), and consideration of up-to-date seasonal distribution and movement data for Baffin Bay polar bear in the RSA during the shoulder seasons; include more detailed assessment of communication masking for narwhal
3	Vessel Traffic and Anchoring Simulation, modelling results	DFO 3.1.1 DFO 3.1.2 DFO 3.1.6 DFO 3.1.7 PC 01	July 10, 2019	Simulations planned for April 15-18, update to be provided on May 13, 2019

**note some dates have been modified since the filing of Baffinland's technical comment responses*

Table 2: Updated Management and Monitoring Plans

Item #	Description of Item	ID#	Baffinland Submission Date*	Comments
4	Railway Operation and Maintenance Plan	CIRNAC 03	May 13, 2019	
5	Phase 1 Waste Rock Management Plan	CIRNAC 05 CIRNAC 06 CIRNAC 08 CIRNAC 09 ECCC 3.19	Dec. 31, 2019	CIRNAC and ECCC support the ongoing process to modify the Phase 1 Waste Rock Management Plan through a separate NWB

2275 Upper Middle Road East, Suite 300 | Oakville, ON, Canada L6H 0C3
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Item #	Description of Item	ID#	Baffinland Submission Date*	Comments
		ECCC 3.20		
6	Interim Closure and Reclamation Plan	CIRNAC 06	May 1, 2019	
7	Updated Hazardous Materials and Hazardous Waste Management Plan	CIRNAC 10 TC 22 TC 23	May 1, 2019	
8	Updated Snow Management Plan	CIRNAC 13	May 13, 2019	
9	Updated Roads Management Plan	ECCC 3.16	March 31, 2019	
10	Marine Environmental Effects Monitoring Plan	ECCC 3.18	May 13, 2019	
11	Railway Emergency Response Plan	ECCC 3.21	May 13, 2019	
12	Updated Terrestrial Environment Mitigation and Monitoring Plan (TEMMP)	GN 16	May 13, 2019	
13	Updated Air Quality and Noise Abatement Plan	HC 06	May 13, 2019	
14	Marine Environmental Effects Monitoring Plan	QIA 43	May 13, 2019	
15	Updated Waste Management Plan	TC 24	May 1, 2019	
16	Updated Spill Response Plan	TC 27	July 10, 2019	

**note some dates have been modified since the filing of Baffinlands technical comment responses*

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Table 3: Other items listed in Baffinland's Disposition Table

Item #	Description of Item	ID#	Baffinland Submission Date*	Comments
17	Borrow Source Investigation Factual Data Report	CIRNAC 02 CIRNAC 06	May 1, 2019	
18	Geotechnical Recommendations for North Railway Report	CIRNAC 04 NRCan 02 QIA 25	May 1, 2019	
19	Surficial sampling results	CIRNAC 07	August 28, 2019	
20	Alternative shipping route assessment	DFO 3.1.4 GN 23	July 10, 2019	
21	Supplemental information package (crossings)	DFO 3.10.1 DFO 3.10.2 DFO 3.10.3 DFO 3.10.4 DFO 3.11.1 DFO 3.11.2 DFO 3.11.3 QIA 42	May 1, 2019	
22	Black carbon emission estimate	ECCC 3.08	May 1, 2019	
23	Criteria air contaminants (CAC) shipping emission estimate	ECCC 3.09	May 1, 2019	
24	Updated NO2 predictions	ECCC 3.11	May 1, 2019	
25	Estimated effluent loadings into Milne Inlet memo	ECCC 3.17	May 1, 2019	
26	Baffinland will provide additional information in the form of a memo	GN 05	TBD following technical meetings	
27	Baffinland will re-analyze the potential impacts to caribou	GN 12	TBD following technical	

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Item #	Description of Item	ID#	Baffinland Submission Date*	Comments
	crossing of the railway. This re-analysis will include alternative combined embankment+superstructure+rail heights of ≥ 1.5 , ≥ 2.0 , and ≥ 2.5 metres, and slope and embankment grain size as potential barriers to caribou movement		meetings	
28	Baffinland will provide clarification on whether either version of the energy/protein model considered both excluding movement and harvest scenarios together	GN 18	TBD following technical meetings	
29	Review literature for availability of snow geese data and reconsider the influence of such data should they exist on the risk assessment in discussion with Health Canada.	HC 03	TBD following technical meetings	
30	Volatiles and Non-Volatiles (VOCs and PAHs) modelling Report	HC 05 HC 10	TBD following technical meetings	
31	Updated Adaptive Management memo	QIA 04	July 10, 2019	
32	Community Risk Workshop Report	QIA 04 QIA 47	July 10, 2019	
33	i) Re-examination of food security as separate Valued Socio-Economic Component (VSEC) ii) Review Wildlife Compensation Fund (WCF) with QIA and communities	QIA 08	i) July 10, 2019 ii) TBD following technical meetings	
34	Updated Railway Operation and Maintenance Plan	QIA 24 QIA 26 QIA 31	May 1, 2019	
35	2019-20 IIBA Work Plan	QIA 34 QIA 35 QIA 36	June 30, 2019	
36	Development of additional socio-economic indicator thresholds	QIA 38	TBD following technical	

Item #	Description of Item	ID#	Baffinland Submission Date*	Comments
	and actions		meetings	
37	Ballast Water Dispersion Model Verification Report	QIA 44	TBD following technical meetings	
38	Baffinland proposed amendments to PC terms and conditions	n/a	June 10, 2019	

**note some dates have been modified since the filing of Baffinland's technical comment responses*