



## Inuit Qaujimanituqangit Management Framework Phase 2 Proposal – Mary River Project

Baffinland Iron Mines Corporation  
Mary River Project  
NIRB File No. 08MN053



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**Appendix A: Baffinland Alignment with Inuit Societal Values**

# 1 INTRODUCTION

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## 1.1 Overview

This plan applies to the Mary River Project (the Project). It has been developed in consideration of feedback provided during the regulatory review process for the Phase 2 Proposal.

Baffinland views Inuit Qaujimanituqangit (IQ – refer to Section 1.3 for a discussion on definitions) as central to the successful planning and operations of the Mary River Mine (the Project). IQ is reflective of the Inuit knowledge transferred from generation to generation. IQ captures knowledge of relationships and morality, core values and worldviews, as well as, environmental knowledge. Inuit use IQ for decision-making in their everyday life choices, such as determining where to go or what to hunt. It is important for Baffinland to acknowledge and use IQ in day-to-day project operations in the same manner. A discussion of the use of this term and other definitions is provided in Section 1.3. As identified in the Mary River Project Inuit Impact and Benefit Agreement (IIBA), IQ is beneficial for the Project and provides critical alternative insights into the environmental, ecological, cultural and socioeconomic dimensions of the Project.

Given the importance of IQ, this management framework has been developed to guide its integration and use. The IQ Management Framework supports collaboration and decision-making throughout the lifetime of the Project and is not limited to the approach or methods associated with an individual IQ study.

The purpose of the IQ Management Framework is to identify procedures and provide guidance on the following;

- The processes through which IQ can be shared with Baffinland
- Schedule and timing for gathering and integration of IQ
- Roles and responsibilities of parties involved
- Processes and mechanisms through which IQ informs Project related decision-making

The IQ Management Framework also defines commonly used terms to support communication between parties and identifies the relationship between the IQ Management Framework and other management and monitoring plans.

The use of IQ in decision-making processes is a living initiative, which is designed and implemented in partnership with the Qikiqtani Inuit Association (QIA) and the five North Baffin communities (Igloolik, Pond Inlet, Hall Beach, Clyde River and Arctic Bay). It is therefore expected that this framework will be modified and adapted over time to reflect the evolving needs and preferences of the North Baffin communities, QIA and Baffinland.

## 1.2 Relationship to Other Management/Monitoring Plans

*Adaptive Management Plan:* The Adaptive Management Plan (AMP) for the Project provides an overview of the management mechanisms established to identify where additional mitigation or monitoring may be required to address potential adverse effects. A key part of adaptive management is the incorporation of community feedback; particularly, the incorporation of IQ (see Section 6.1 for further discussion on the AMP).

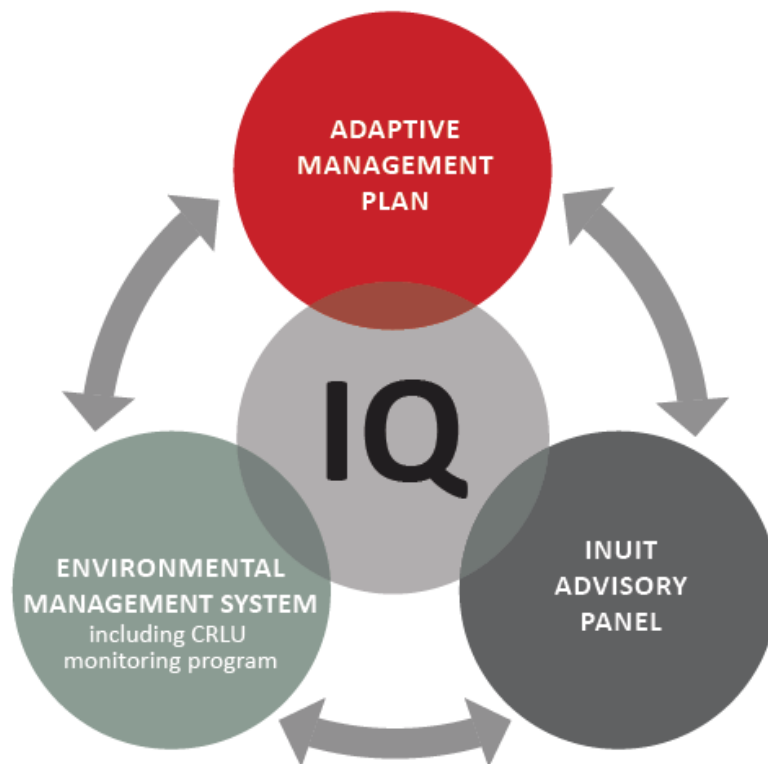
*Inuit Advisory Panel:* Baffinland is committed to establishing an Inuit Advisory Panel (IAP). The objective of the IAP is to integrate Inuit Qaujimanituqangit into project planning and the development and implementation of environmental and socio-economic monitoring programs. In recognition of the IAP's intent and IIBA Article 15.5.2, Baffinland will work with the QIA and North Baffin communities to develop mutually acceptable Terms of Reference for the Inuit Advisory Panel (see Section 3.3 for further discussion on the IAP).

*Culture, Resource and Land Use Monitoring Program:* Baffinland will be developing a periodic Culture, Resource and Land Use (CRLU) Monitoring Program that will be based on formal IQ studies. These programs will be conducted at regular

intervals during Project operation – these intervals will be determined in consultation with QIA (see section 3.4 for further discussion on the CRLU Monitoring Program) and the IAP.

All of these components of integrating Inuit data and knowledge into project planning, operation, and monitoring are influenced by IQ and provide feedback mechanisms for IQ to inform, change, and improve the Project (Figure 1).

**Figure 1 Relationship of IQ to Project Adaptation**



### 1.3 Terminology and Definitions

Several terms relevant to the IQ Management Framework are defined in Table 1-1. The definitions below are intended to support communication between parties and to clarify, particularly for non-Inuit involved in the Project, how these terms are understood and used in the context of the Project. These definitions are not meant to limit the use of the terms beyond the context of the Project. While Inuit Qaujimajatuqangit is the language included in the Mary River Inuit Impact Benefit Agreement (IIBA), Inuit Qaujimanituqangit is a broader term which reflects intergenerational knowledge transfer. Baffinland welcomes further discussion about distinctions between these Inuktitut terms and concepts. However, Baffinland will be using the term Inuit Qaujimanituqangit to stay consistent with the principles of adaptive management and the applicable monitoring programs and plans.

**Table 1-1 Terms and Definitions in the IQ Framework**

Term	Definition
Traditional Knowledge (TK)	The accumulated body of knowledge, observations and understandings about the environment, and about the relationship of living beings with one another and with the environment, that is rooted in the traditional way of life of Inuit of the designated area
Inuit Qaujimanituqangit (IQ)	Inuit Qaujimanituqangit (IQ) is reflective of the Inuit knowledge transferred from generation to generation, and captures knowledge of relationships and morality, core values and worldviews, as well as, environmental knowledge.
Inuit Qaujijatuqangit	The term Inuit Qaujijatuqangit is meant to encompass Inuit traditional knowledge, local and community-based knowledge, as well as Inuit epistemology as it relates to Inuit Societal Values and Inuit Knowledge (both traditional and contemporary). The use of the term can be guided by the Inuit Social Values, as set out by the Government of Nunavut.
Inuit Social Values (ISV)	As most recently described in the Government of Nunavut's (2018) mandate document <i>Turaaqtavut</i> Inuit Social Values are described as: <ul style="list-style-type: none"> <li>• <i>Inuuqatigiitsiarniq</i> - Respecting others, relationships and caring for people</li> <li>• <i>Tunnganarniq</i> - Fostering good spirits by being open, welcoming and inclusive</li> <li>• <i>Pijitsirniq</i> - Serving and providing for family and/or community</li> <li>• <i>Aajiiqatigiinniq</i> - Decision making through discussion and consensus</li> <li>• <i>Pilimmaksarniq/Pijariuqsarniq</i> -Development of skills through observation, mentoring, practice, and effort</li> <li>• <i>Piliriqatigiinniq/Ikajuqatigiinniq</i> - Working together for a common cause</li> <li>• <i>Qanuqtuurniq</i> - Being innovative and resourceful</li> <li>• <i>Avatittinnik Kamatsiarniq</i> - Respect and care for the land, animals and the environment</li> </ul>
IQ Study	A project undertaken to gather IQ which is conducted under research license from the Nunavut Research Institute (NRI).
Informal IQ Integration	IQ provided by Inuit community members to Baffinland through ongoing engagement activities, participation in monitoring programs or other initiatives not conducted under an NRI license.
Engagement	Engagement is a process of two-way communication that addresses the specific needs of the North Baffin communities and Baffinland for information in a way that is understandable to all parties in the discussion.
Public Consultation	Public consultation is a vehicle for facilitating two-way communications for the Project. It provides an avenue for the residents of neighboring communities to the Project, organizations, government institutions, Project lenders, and Baffinland to improve their decision-making process while fostering a culture of understanding and participation. Consulting with stakeholders involves dialogue with those persons or groups who have the ability to influence the Project's outcome.
Note: The following documents were reviewed for information related to these definitions; Baffinland's Community and Stakeholder Management Plan, Government of Nunavut's <i>Turaaqtavut</i> , Qikiqtani Inuit Association's Inuit Qaujimanituqangit Statements, Mining Association of Canada's Aboriginal and Community Outreach Protocol and the Nunavut Impact Review Board Proponent's Guide.	

## **2 GUIDING PRINCIPLES**

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The various guiding principles outlined below are adapted from the Mary River Project IIBA, the Inuit Societal Values, the QIA's IQ Statements and Baffinland's Sustainable Development Policy. The guiding principles will guide Baffinland in the implementation of the IQ Management Framework.

### **2.1 Mary River Project IIBA**

The IIBA includes guidance and requirements for Inuit Consultation (Article 14) and Inuit Qaujimajatuqangit (Article 16). The IQ Management Framework will be developed and implemented in consideration of these commitments. Examples are provided below.

- Baffinland is required to provide the QIA with prior notification in any instance where Inuit engagement activities are being planned, including the integration of IQ (Article 14.14.2)
- Baffinland will continue to consult with QIA and incorporate IQ into its management and monitoring plans (Article 16.3.1).
- Baffinland will not publicize any IQ data or information without obtaining an agreement for its use from both the contributor and the QIA (Article 16.3.4).
- Baffinland and QIA will work collaboratively to develop methodological approaches for IQ collection and use to review and verify IQ information (Article 16.3.8).
- Baffinland will not include sensitive information such as, but not limited to, the locations of sacred or spiritual sites, and heritage and burial sites, in any written reports or disclose the information under any circumstances except to QIA, in which case QIA shall take reasonable steps to protect the confidentiality of such information (Article 16.3.7)
- Baffinland will work with QIA to develop methodological approaches for IQ collection and use to review and verify IQ information and use in analysis (Article 16.3.8)
- Baffinland will pay the costs of collecting, recording, analyzing, assembling and delivering to the QIA on all Inuit Knowledge collected and developed (Article 16.4.4).

### **2.2 INUIT SOCIETAL VALUES**

The Project as designed, inherently considers and adheres to Baffinland's understanding of the intent of Inuit Societal Values. Baffinland has adopted Corporate Values that recognize and endorse the Inuit Societal Values. Examples of how Baffinland aligns with these Inuit Societal Values can be referred to in Appendix A.

- *Inuuqatigiitsiarniq* - Respecting others, relationships and caring for people
- *Tunnganarniq* - Fostering good spirits by being open, welcoming and inclusive
- *Pijitsirniq* - Serving and providing for family and/or community
- *Aajiiqatigiinni* - Decision making through discussion and consensus
- *Pilimmaksarniq/Pijariuqsarniq* - Development of skills through observation, mentoring, practice, and effort

- *Piliriatigiinniq/Ikajuqtigiinniq* - Working together for a common cause
- *Qanuqtuurniq* - Being innovative and resourceful
- *Avatittinnik Kamatsiarniq* - Respect and care for the land, animals and the environment

## **2.3 QIA IQ Statements**

The IQ Statements identified by the QIA (QIA 2019) outline core principles related to the collection, use and protection of Inuit Qaujimanituqangit.

- IQ should be described in terms that reflect how intricate, deep and global it is.
- IQ is based on core values, but it is not static. Inuit use IQ to make decisions now and in the future.
- Land use must accord with IQ. Inuit continue to depend on the Land for survival.
- Interaction with Inuit should be guided by IQ and Inuit Societal Values.
- Inuit must be invited to share IQ and be part of process design to collect IQ.
- IQ belongs to Inuit. It is properly applied and interpreted by Inuit.
- Inuit and IQ must be involved in decision-making that affects Inuit.
- IQ must be given due consideration to make decisions that affect Inuit

In addition to the IQ statements outlined above, the QIA also refer to several additional IQ Standards. These IQ Standards will also be used to inform Baffinland's implementation of this IQ Framework (QIA 2019):

- IQ encompasses more than observed environmental knowledge.
- Inuit from different walks of life, experiences, age and gender groups may hold IQ and be a knowledge holder.
- IQ from different Inuit demographics may be required in order to have a well-rounded IQ perspective in decision-making.
- In decisions that impact Inuit, IQ and other forms of knowledge held by Inuit should be treated as equally to western scientific, technical and legal knowledge.

Baffinland acknowledges its responsibility as a party which receives IQ to work towards implementation of these guiding principles in collaboration with QIA and the North Baffin communities. Baffinland makes the following commitments with respect to these IQ Statements, which will guide the implementation of the IQ Management Framework.

### **IQ best practices**

- employ consultants and employees that demonstrate respect for IQ
- will follow all Inuit community-specific protocols as identified by Inuit communities.
- will provide adequate time for the collection, management, authorization, validation and verification of IQ.



- acknowledges that Inuit communities have full control over and ownership of their IQ intellectual property.
- will include different Inuit demographics to ensure a well-rounded IQ perspective is established in decision-making.
- will record broad demographic information during future formal and informal IQ gathering and integration
- will consider IQ and other forms of knowledge from Inuit with an equal weight to other information inputs.
- will encourage a diverse composition of IAP members
- will apply for an NRI Research License for all formal IQ Studies, and will consult with the QIA and IAP to develop applications.
- has and will respect calls from Inuit communities to conduct additional studies to gather IQ relevant to the Project, including through the CRLU Monitoring Program.
- will provide adequate financial support for the collection, validation and verification of IQ through the Inuit Advisory Panel, CRLU Monitoring Program and other initiatives identified in section 3.

#### **Communication**

- define IQ appropriately in all documents and communications and will lessen the use of abbreviations to support clear communication
- will communicate the use of IQ in decision-making processes back to Inuit communities in accessible written and oral formats.

#### **IQ integration**

- once established, will collaborate with the Inuit Advisory Panel when integrating IQ so that it's application and interpretation are properly applied.
- will include references to where and how IQ was integrated in all Project documents. Once established, will be advised by the Inuit Advisory Panel in regard to the integration of IQ.

#### **Project milestones**

- continue to collect data specific to the current and proposed Mary River Mine operations.
- acknowledges that IQ governs relationships between Inuit and use of the land by Inuit. Once established, will collaborate with the Inuit Advisory Panel to structure Project operations and future Project planning to accord with IQ.

## **2.4 Baffinland's Sustainable Development Policy**

As identified in the Sustainable Development Policy Baffinland will: "...respect human rights, the dignity of others and the diversity in our workforce. Baffinland honors and respects the unique cultural values and traditions of Inuit".

In keeping with the company's mission and values, the Sustainable Development and Human Rights policies guide the implementation of this framework while ensuring that the health and safety of the employees and environment is top priority. Baffinland is committed to conducting all aspects of business in accordance with the principles of sustainable

development and corporate responsibility and always with the needs of future generations in mind. Baffinland conducts its business in accordance with the Universal Declaration of Human Rights and its Workplace Conduct Policy and Respectful Workplace Policy, which applies to all employees and affiliates globally.

## 3 INUIT QAUJIMANITUQANGIT AND THE MARY RIVER MINE

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The IIBA provides guidance on the use of IQ (Article 16.3), and ownership of IQ (Article 16.4). This document will provide context and direction to assist in implementing the terms of those articles.

### 3.1 Inuit Qaujimanituqangit Studies

The Nunavut Scientist's Act requires researchers undertaking Projects in Nunavut to obtain a license from the Nunavut Research Institute, with the exception of research involving wildlife which is licensed under the Nunavut Wildlife Act. Through this formal application process, engaging with Inuit and the incorporation of IQ is required. Licensing controls how IQ is accessed by those outside the IQ system, by requiring research proposals to address certain data collection and research design issues. In controlling how IQ is accessed by those outside the system, this formal process manages the interface between the IQ system and the western knowledge system to address knowledge gaps or power imbalances. As stated in section 16.4 of the IIBA, Baffinland acknowledges that the intellectual property rights of IQ and the Inuit protocols for conducting IQ studies are an important piece of IQ integration.

### 3.2 Ongoing informal IQ integration

Baffinland seeks to gather IQ through frequent and ongoing community engagement, where community members have the opportunity to share their unique knowledge and values in relation to the Project. While it is true that all community engagement cannot be considered IQ (e.g. general comments, clarifications, and questions asked about Project activities or how to access Project benefits and programs), it would not be appropriate to fully separate it from IQ either. In other words, although not always classified as IQ gathering activities, engagement activities do provide important opportunities for Baffinland to learn about IQ and community-based knowledge perspectives relative to the Project. Through community engagement and research, residents have often used their knowledge to share observations about the land, wildlife, and their communities; describe insights and concerns related to Inuit livelihood effects; and suggest ways these issues might be addressed. These valuable comments are used to develop a more comprehensive assessment of socio-economic and environmental issues.

Informal IQ is shaped through a participatory action approach. Inuit communities are engaged with the Project through community meetings, working groups and ongoing monitoring programs. Community feedback is taken into consideration by Baffinland and used in the decision-making processes regarding Project design, planning and operations. The participatory action approach is an informal but effective way for Baffinland to engage with Inuit to better understand their concerns, particularly related to environmental management.

### 3.3 Inuit Advisory Panel

Baffinland has proposed the creation of an Inuit Advisory Panel (IAP) as a means to involve Inuit in the full life cycle of Project development, from planning to reporting. Baffinland's approach to developing the IAP is grounded in several relevant articles of the IIBA, including:

- Article 16.4.8 "From time to time Working Groups may be established, as described in Section 15.5, to pursue the objectives of Section 16.2 [Objectives of IQ]"
- Article 15.5.2 "Working Groups shall be established by the Parties, in accordance with mutually acceptable "Terms of Reference" agreed by the Parties, to...

*(e) Incorporate Inuit Qaujimajatuqangit into project planning as per the objectives of Article 16.*

*(f) Integrate Inuit Qaujimajatuqangit into the development and implementation of all environmental and socio-economic monitoring programs;"*

Accordingly, the Terms of Reference for the IAP and mandate to implement the IQ Management Framework is subject to ongoing discussion between the QIA and Baffinland, in accordance with Article 15.5.2 of the IIBA. However, at present Baffinland believes that the Inuit Advisory Panel's advice in the following areas would improve Project planning and support the use of IQ and Community perspectives in company decision making processes:

- Advice on the development of monitoring programs, and interpretation of results
- Advice on the implementation of adaptive management strategies, as necessary
- Advice on the development of future modifications to the project and subsequent application materials

North Baffin communities must also be involved in the development of the Terms of Reference, understanding they will ultimately form the composition of the IAP. Key areas where Baffinland may expect to solicit input include, but are not limited to:

- Composition
- Roles and responsibilities
- Coordination
- Scope of recommendations
- Recommendation development process
- Relationship to other working groups
- Meeting requirements
- Reporting mechanisms for decision making, transparency and discussions about how advice will be integrated

### **3.4 Culture, Resource, and Land Use Monitoring Program**

As part of the IQ Management Framework, and as required monitoring for CRLU, Baffinland will be developing a periodic CRLU Monitoring Program to be conducted at regular intervals during Project operation – these intervals will be determined in consultation with QIA and North Baffin communities. The nature of the Monitoring program for CRLU will be based on formal IQ studies that will include a variety of methods and will be designed specifically around areas where residual effects are anticipated, or where there is uncertainty in the nature of the predicted effects. The methods that will be used for this work will be influenced by consultation with the North Baffin communities, QIA, and the proposed Inuit Advisory Panel.

Other measurable parameters of culture, resources and land use will also be reported if these are not otherwise captured in the Socio-economic monitoring such as use of the country food kitchen (this is a space at the mine site which is dedicated to the preparation of traditional foods) and any related StatsCan data. The results of the CRLU Monitoring program will be an integrated component of adaptive management planning, as these results will have a direct tie-in to other monitoring plans.

This overview of the CRLU Monitoring Program is intended to support ongoing discussions and development of a written-plan and implementation. Key milestones to this development include the following, which may be revised in consultation with QIA:

- The CRLU Monitoring Program will be detailed in a plan within one year following issuance of the revised project certificate. This will be done in consultation with the QIA and will include community feedback.
- The intention is to conduct the first CRLU Monitoring Program three months after commissioning of the railway.

## 4 SCHEDULE AND TIMING

Gathering and integration of IQ is an ongoing process that occurs through formal and informal methods, as described in Section 3.1 and 3.2 respectively. General ongoing Project communication and consultation is part of how Inuit data and knowledge is transmitted and contributes to Project planning. There are also known project activities and events where IQ can deliberately be requested, and other Project activities which are not scheduled but can be anticipated (e.g., modifications to approved Project).

### 4.1 Informal Mechanisms

Since inception of the Project in 2004, Baffinland has been proactively engaging with local communities. Since operations began Baffinland has permanently established a presence in North Baffin communities through its Baffinland Community Liaison Officers (BCLO's) and has included frequent and varied discussions with local organizations, and engagement with Inuit communities and organizations (e.g. Hunters and Trappers Organizations and Hamlets), and with QIA as the Designated Inuit Organization representing the North Baffin Inuit. There are many existing opportunities for Informal IQ collection and integration that occur with regular frequency throughout the year. Some examples are provided below (Table 4-1).

**Table 4-1 Examples of Informal Mechanisms and Frequency**

Opportunities for Informal IQ integration	Frequency
Terrestrial Environmental Working Group (TEWG)	Bi-annually (in-person); Bi-annually (Teleconference)
Marine Environmental Working Group (MEWG)	Bi-annually (in-person); Bi-annually (Teleconference)
Mary River Socio-Economic Working Group (SEMWG)	Bi-annually (in-person); Bi-annually (Teleconference)
Qikiqtaaluk Socio-economic Monitoring Committee (QSEMC)	Annually (in person)
Annual Project Review Forum	Annually (in person)
Community Group Meetings (Community Tours, HTO Meetings, Youth groups, elder's committees, etc.)	Frequent
Public Meetings	Regular tours (IIBA implementation) as well as ad hoc (project milestones; permitting; project updates; monitoring results etc.)
Community site visits	As requested, or needed (e.g. providing information on or review of project facilities or activities)

### 4.2 Formal Mechanisms

#### 4.2.1 Project Milestones and Anticipated Project Changes

The integration of IQ will evolve and adjust to the status of the Project milestones, including any expansions or other major Project proposals. Any changes to the process will follow the principles outlined in section 2 and the principles of adaptive management. The need for specific IQ programs will be identified in consultation with the QIA, and the Inuit Advisory Panel.

## 5 ROLES AND RESPONSIBILITIES

### 5.1 Baffinland and QIA

While it is anticipated that the QIA is responsible for monitoring the integration of IQ, Baffinland is ultimately responsible for implementing, monitoring and reporting IQ back to the QIA and North Baffin Communities. There are several key Baffinland personnel that are responsible for the implementation of the IQ Management Framework (Table 5-1).

**Table 5-1 Roles and Responsibilities of Baffinland employees adapted from the Community and Stakeholder Management Plan**

Title/Role	Responsibilities for implementing the IQ Framework
<b>Vice President, Sustainable Development AND Vice President, Community and Strategic Development</b>	<ul style="list-style-type: none"> <li>Oversee and approve engagement activities/IQ studies</li> <li>Manage overall dialogue with government and community stakeholders</li> <li>Participate in and support relevant engagement activities</li> <li>Direct Northern Affairs Offices</li> <li>Baffinland leads for the work of the Inuit Advisory Panel</li> </ul>
<b>Head, Northern Affairs (Iqaluit Office)</b>	<ul style="list-style-type: none"> <li>Oversee implementation of the IQ Framework</li> <li>Coordinate with Project operations to confirm whether engagement messages are consistent with Project plans</li> <li>Alert the Vice President, Sustainable Development and Vice President Community Strategic Development to emerging issues and trends</li> <li>Manage Baffinland Liaison Officers BCLOs</li> <li>Ensure that complaints are initiated correctly through the Grievance Mechanism or directed back via the internal Human Resources process</li> </ul>
<b>Manager</b>	<ul style="list-style-type: none"> <li>Central coordination of Inuit Advisory Panel</li> <li>Direct submitted concerns to the appropriate department</li> <li>Track responses to concerns in coordination with the Head, Northern Affairs</li> <li>Assist Head, Northern Affairs with SEPCSEP/IQ Management Framework implementation</li> </ul>
<b>Baffinland Community Liaison Officers (5 North Baffin Communities)</b>	<ul style="list-style-type: none"> <li>Co-ordinate and ensure that engagement activities occur as planned</li> <li>Provide input into regular meetings with the key department managers to monitor activities, stakeholder feedback and issues</li> <li>Advise managers and their respective departments on recommended engagement practices and procedures</li> <li>Act as a first point of contact for concerns coming from interested parties located in the North Baffin Communities</li> <li>Support preparation of monitoring and evaluation reports</li> </ul>

Baffinland collaborates with QIA when planning and integrating formal and informal IQ. This collaboration can take many forms and levels. The collaboration levels are aligned with the description of QIA and Baffinland's collaborative planning Inuit engagement initiatives provided in the IIBA Implementation Guide (Table 5-2).

**Table 5-2 Levels of collaboration between the QIA and Baffinland**

Level of Collaboration	Description
<b>Inform</b>	<ul style="list-style-type: none"> <li>The integration of IQ is planned and executed solely by Baffinland. QIA is informed of the activities and any resulting feedback.</li> <li>On-going and continuous engagement activities (e.g. regular project updates; community events; topic specific meetings – annual shipping meetings)</li> </ul>
<b>Input</b>	<ul style="list-style-type: none"> <li>QIA is solicited for input in determining the priority of IQ Projects or studies and the methodology employed in the collection, verification, analysis and use of IQ. QIA is kept well informed on the integration of IQ, the outcomes of and resulting feedback.</li> <li>QIA and Baffinland may choose to this level of collaboration when working on IQ studies or when integrating IQ through informal mechanisms.</li> </ul>
<b>Participate</b>	<ul style="list-style-type: none"> <li>QIA and Baffinland will participate equally in the process of integrating IQ into the Project. This may include joint planning and identification of study methods, joint attendance and implementation of IQ study phases such interviews, workshops or field work and/or joint report authorship.</li> <li>QIA and Baffinland may choose this level of collaboration when conducting IQ studies.</li> </ul>

The IIBA Implementation Guide specifies communication milestones between the QIA and Baffinland in regard to Inuit engagement on two levels: engagement associated with implementation of the IIBA, and engagement related to other regulatory authorizations. Planned engagement takes place regularly throughout the year in conjunction with annual IIBA Planning (Table 5-3).

**Table 5-3 Baffinland and QIA Engagement Communication Milestones <sup>1</sup>**

	Responsible	Timelines
Annual engagement activities proposed (i.e., Engagement Notification Forms in draft annual work plan (AWP))	Baffinland	February 15
Review of proposed engagement activities	Committees; QIA Inuit Engagement Specialist	March 1 – March 25
Revision to proposed engagement activities	Committees	March 25
Annual IIBA Work Plan approved	Executive Committee	March 31
Engagement materials shared with QIA	Baffinland	15 days prior to engagement activity date
Review of proposed engagement materials	QIA Committee members;	Within 10 days
Revision of proposed engagement materials	Baffinland	Per Baffinland timelines
Perform engagement activities	Per Planning; QIA Inuit Engagement Specialist	Per planning
Inuit engagement documented in Quarterly IIBA Reports	Baffinland	Within 30 days of the end of the quarter
Annual reporting	Baffinland	Annual IIBA Report – April 30

1 - This table was adapted from the IIBA Implementation Guide (2019).



### **5.1.1 Ongoing Definition of Roles and Responsibilities**

Baffinland is committed to establishing and maintaining a positive relationship with the QIA through ongoing engagement and collaboration. As described above, the roles and responsibilities are defined in the IIBA. However, there are areas where clear definitions of roles are required, or where these need to be defined based on the Project activities. Baffinland is committed to ongoing discussion with QIA regarding these items, including interpretation of the clauses of the IIBA; levels of involvement by the QIA for various levels of engagement and how this will be determined; and terms of reference for the Inuit Advisory Panel.

## **5.2 North Baffin Communities**

Baffinland's approach to engaging with the five North Baffin communities is designed to be responsive to the needs of each community. Baffinland is committed to building and maintaining community relationships while optimizing community benefits of the Project. This meaningful engagement emphasizes the importance of informing Inuit communities and other stakeholders, establishing effective communication strategies and collecting feedback on potential issues and concerns.

Based on discussions with the Municipality of Igloolik, Baffinland is developing community specific consultation guidelines for the North Baffin communities. Baffinland is working with the Municipality of Igloolik to develop the initial draft guidelines, which will then be used to approach the other four communities to jointly develop each of their own community-specific consultation guidelines. As the guidelines are developed, they will be appended to the Community and Stakeholder Engagement Plan.

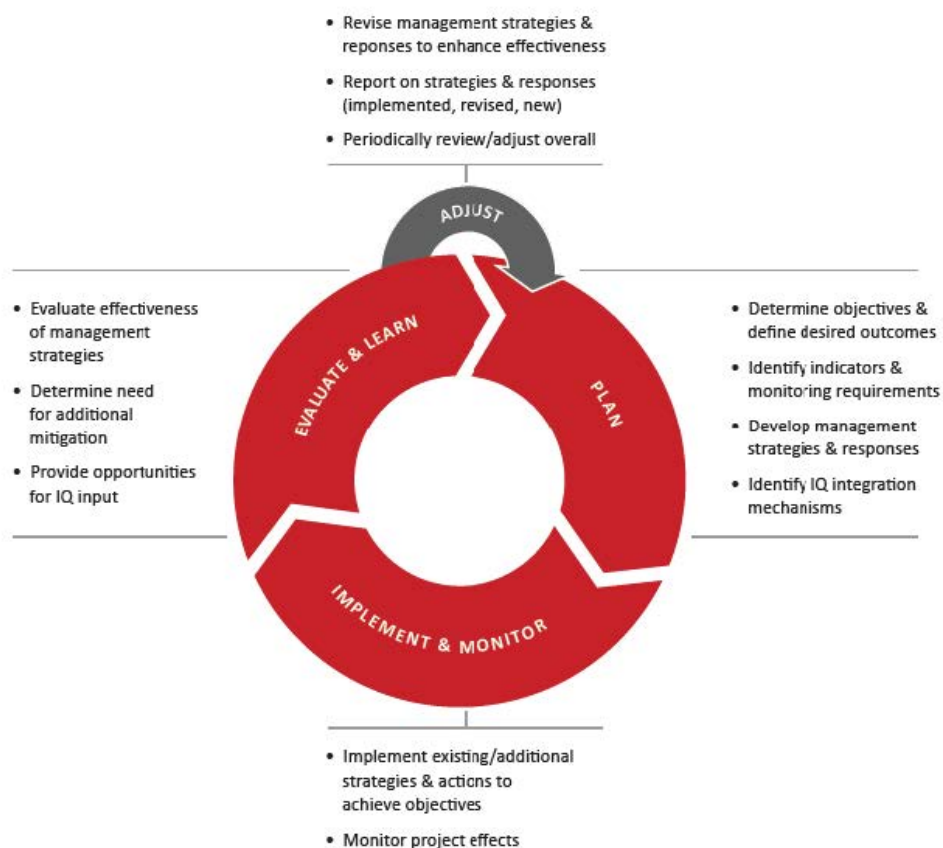
## 6 ADAPTIVE MANAGEMENT

The Adaptive Management Plan (AMP) for the Project provides an overview of the management mechanisms established to identify where additional mitigation or monitoring may be required to address potential adverse effects. This includes procedures to address uncertainty or conditions that may occur during operations that were not anticipated during the planning phase. A key part of adaptive management is the incorporation of community feedback; particularly, the incorporation of IQ to improve the Environmental Management System (EMS) for the Project.

Working groups such as the Marine Environment Working Group (MEWG), the Terrestrial Environment Working Group (TEWG), and the Socio-economic Working Group (SEWG) contribute to adaptive management through their inputs into updates to management plans and monitoring programs to facilitate their improvement. These groups are all established through Project Certificate 005.

There are several key phases of adaptive management for the Project; planning, implementation and monitoring, evaluation and learning and the adjusting phases. Each phase involves an IQ component that is an essential part of the adaptive management process. In the planning phase, mechanisms are identified for IQ integration and influence and then implemented and monitored by IQ holders. IQ holders have an opportunity to provide input in the evaluation and learning phase regarding the results of the monitoring program and future input for adaptive management.

**Figure 2 Baffinland’s Adaptive Management Process**



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## **APPENDIX A: BAFFINLAND ALIGNMENT WITH INUIT SOCIETAL VALUES**

Inuit Societal Value	How Baffinland has Incorporated Each Value into the Mary River Project
Inuuqatigiitsiarniq Respecting others, relationships and caring for people	<p>Baffinland provides a work environment where all workers are treated with respect and dignity. It is the policy of Baffinland to prohibit any form of violence and unlawful harassment, including harassment based on race, ancestry, place of origin, color, ethnic origin, citizenship, creed, sex, sexual orientation, gender identity, gender expression, age, record of offences, marital status, family status, or any other prohibited ground of discrimination. Baffinland respects human rights, the dignity of others, and diversity in our workforce. Baffinland also honors and respects the unique cultural values and traditions of Inuit.</p> <p>People are our greatest asset, and nothing is as important as their health and safety. Our motto is ‘Safety First, Always’. We foster and maintain a positive culture of shared responsibility based on participation, behavior, awareness, and promoting courageous leadership. We allow our employees and contractors the right to stop any work if and when they see something that is not safe. We also ensure resources are available to support our employees when needed, including through our Employee and Family Assistance Program, Community Counsellor Program, on-site Inuit Cultural Advisors, and site medic.</p>
Tunnganarniq Fostering good spirits by being open, welcoming and inclusive	<p>Baffinland welcomes workers to the Project from throughout the Qikiqtaaluk Region and elsewhere. We have developed programs and policies to be inclusive of individuals from all walks of life and have zero-tolerance for any form of workplace harassment. Furthermore, we acknowledge the Project is located on Inuit owned lands and recognize we need to be culturally sensitive and aware in our everyday operations. To this end, we support various Inuit cultural events and programs both on-site and in nearby communities. We also deliver mandatory cross-cultural training to our employees and contractors, support the use of Inuktitut in the workplace, and welcome visiting Inuit land users at Project sites. Furthermore, we have implemented several programs to accommodate individuals interested in Project employment, but who may lack formal skills and experience in a mining environment; our goal is to welcome as many interested and qualified Inuit to the Project workforce as possible.</p>
Pijitsirniq Serving and providing for family and/or community	<p>Baffinland views itself as part of the Qikiqtaaluk community and contributes to community development in several ways. This includes providing meaningful employment, training, and contracting opportunities to Inuit, in addition to paying all relevant taxes, royalties, and fees to government agencies and QIA. The mine is also a type community and we therefore work to support our employees’ health and well-being by providing a safe, supportive, and inclusive working environment. We acknowledge sustainable development extends beyond our everyday mining operations and will thus continue contributing to various North Baffin community wellness initiatives and programs (e.g. through the INPK Fund and other IIBA commitments, community donations). Serving and providing for the community also extends to the traditional economy and Baffinland has made various commitments in this area as well (e.g. Harvesters Enabling Program in Pond Inlet, Wildlife Compensation Fund, seasonal country food exchange program, and permitting harvesting and establishing country food kitchens at Project sites).</p>
Aajiiqatigiinni Decision making through discussion and consensus	<p>Baffinland recognizes the valuable insights Inuit and other stakeholders have on the Project, many of which are shared through community engagement and/or review processes (e.g. NIRB environmental assessment process). We are further committed to ongoing IIBA implementation with QIA. We acknowledge the importance of collaboration when making important decisions about Project development. We undertake thorough public engagement to create a shared understanding of relevant social, economic, and environmental concerns and opportunities with communities, regulators, stakeholder organizations, and the public. Our commitments in this area have been formalized in our Stakeholder Engagement Plan, IIBA, and elsewhere. We honor our commitments by being sensitive to local needs and priorities, and we work in active partnership to make decisions where appropriate. Baffinland participates in several collaborative forums for the Project, including various IIBA committees, the Terrestrial Environment Working Group, Marine Environment Working Group, Qikiqtaaluk Socio-Economic Monitoring Committee, and Mary River Socio-Economic Monitoring Working Group. Baffinland remains open to discussing with stakeholders how improved Project outcomes and enhanced community benefits may be achieved.</p>
Pilimmaksarniq/Pijariuqsarniq	<p>Baffinland provides significant training and skill development opportunities to Inuit, including through formal work readiness, apprenticeship, heavy equipment operator, and internship training. Training and skill development opportunities also informally occur through everyday</p>

Inuit Societal Value	How Baffinland has Incorporated Each Value into the Mary River Project
Development of skills through observation, mentoring, practice, and effort	work and on-site mentorship. Many of the skills developed by Inuit at the Project are transferable to other work locations, communities, and home life. Baffinland also supports several school-based initiatives in the North Baffin to help promote successful educational outcomes. These include annual laptop donations to secondary school graduates, post-secondary school scholarships, a school lunch program, and other relevant education-related donations. However, we recognize education and learning are life-long endeavors and opportunities always exist for improvement at Project sites. Baffinland embraces the concepts of adaptive management and continuous improvement to ensure Project enhancements are regularly being considered.
<u>Piliriqatigiinniq/Ikajuqtigiinniq</u> Working together for a common cause	Baffinland is committed to the common goal of sustainable development in the Qikiqtaaluk Region, but recognizes this will require a collaborative effort. Baffinland contributes to the social, cultural, and economic development of the communities it works with and has developed a Sustainable Development Policy and negotiated an IIBA to support corporate goals and actions in this area. Baffinland also takes steps to understand, evaluate, and manage risks on a continuing basis, including those that may impact the environment, employees, contractors, local communities, customers, and shareholders. More generally, we work with communities and other stakeholders to ensure the delivery of meaningful and lasting benefits in the Qikiqtaaluk Region, while also being protective of the environment. We remain open to suggestions from our employees and stakeholders on how Project operations can be improved. To this end, we have implemented an Employee Concerns Policy, conduct regular evaluations of workplace conditions in cooperation with QIA, participate in several multi-party committees and working groups, in addition to regularly engaging other stakeholders on the Project.
<u>Qanuqtuurniq</u> Being innovative and resourceful	Baffinland's employees are our greatest asset and best resource for advancing the Project daily. Developing a world-class mine in the challenging conditions of the Canadian Arctic requires us to constantly innovate and be resourceful, and Inuit have a key role in our success. Employee feedback is encouraged and regularly solicited, and we strive for continual improvement in all aspects of our work. We continuously seek to use energy, raw materials, and natural resources more efficiently and effectively. We also report, manage, and learn from injuries, illnesses, and high potential incidents to foster a workplace culture focused on safety and the prevention of incidents. More simply, we strive to develop more sustainable practices. Community members have provided valuable input on Project plans and outcomes for many years and we will continue to encourage these contributions. IQ and community input have also informed the baseline environmental and socio-economic data we've collected, effects assessments we've conducted, and the mitigation and monitoring programs we've developed.
<u>Avatittinnik Kamatsiarniq</u> Respect and care for the land, animals and the environment	Baffinland acknowledges the importance of the land, animals, and environment to Inuit and the relevance these have to Inuit culture and well-being. Environmental protection is of the highest priority for Baffinland and we abide by all environmental rules and regulations. Furthermore, Baffinland applies the principles of pollution prevention, waste reduction, and continuous improvement to minimize ecosystem impacts and facilitate biodiversity conservation. We also endeavor to ensure that adequate resources are available and that systems are in place to implement risk-based management systems, including defined standards and objectives for continuous improvement. Furthermore, we ensure that an effective closure strategy is in place at all stages of Project development to ensure reclamation objectives are met. Baffinland has employed a balance of the best scientific and traditional Inuit knowledge to safeguard the environment and several mitigation and management measures have been developed in support of this (e.g. management plans for various wildlife and environmental components). The Company continues to engage Inuit on its environmental monitoring programs (e.g. through terrestrial and marine environment working groups) and employs adaptive management to identify and make improvements to the Project that may be required.