



**QIA INFORMATION REQUESTS TO NUNAVUT IMPACT REVIEW BOARD, PHASE II PROPOSAL**

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Information Request # 1	<p>A. Baffinland is requested to provide further detail on anticipated monitoring to be undertaken and mitigation measures to be implemented for the three-year combined Railway construction and Tote Road operations period.</p> <p>B. Baffinland is requested to provide further detail on anticipated monitoring to be undertaken and mitigation measures to be implemented for the first 5 years of combined North Railway and Tote Road operations.</p>
Directed to	Baffinland
Subject	Terrestrial Wildlife and Habitat - Effects of the combined North Railway construction and Tote Road activities on caribou disturbance and movement
Reference	<ul style="list-style-type: none"> <li>Mary River Project Phase 2 Terrestrial Wildlife Technical Support Document, TSD 10, Sections 3.4.1.1 and 3.4.1.2</li> <li>Baffinland (2017), Terrestrial Environment Mitigation and Monitoring Plan, Sections 3.3.1, 3.3.3</li> <li>Baffinland (2018), 2017 Mary River Project Terrestrial Environment Annual Monitoring Report</li> </ul>
Issue/Concern	<p>Baffinland (2018) anticipates that “the greatest disturbance within caribou habitat will be limited to the three years during construction of the North Railway while the Tote Road is being used to haul up to 6 Mtpa of ore to Milne Port”.</p> <p>Baffinland (2018) also anticipates that “at the peak of disturbance during North Railway construction and Tote Road use for hauling, there are likely to be very low densities of caribou and little to no migratory movements in the region”.</p> <p>Although it is understood that the likelihood of caribou being present in the vicinity of the North Railway construction zone is relatively low at this time, it is possible that some may be in the area during the construction period.</p> <p>Given these considerations, it will be critically important for Baffinland to be particularly diligent in effectively monitoring and implementing appropriate mitigation measures to minimize disturbance to caribou (if present) and to allow their effective movement through and in the vicinity of the North Railway construction activities and the operating Tote Road for the duration of the construction program.</p> <p>Subsequently when the North Railway becomes operational, diligent monitoring and mitigation of the combined Tote Road and North Railway operations will need to be continued to ensure that caribou (if present) will be able to safely and successfully move across both linear developments in the future.</p>



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Information Request # 2	<p>A. Baffinland is requested to provide further detail on anticipated monitoring to be undertaken and mitigation measures to be implemented for the three-year combined North Railway construction/Tote Road operations period to protect caribou calving if occurring in the Project area.</p> <p>B. Baffinland is requested to provide further detail on anticipated monitoring to be undertaken and mitigation measures to be implemented in relation to possible caribou calving activities in the Project Area for the first 5 years of combined North Railway and Tote Road operations.</p>
Directed to	Baffinland
Subject	Terrestrial Wildlife and Habitat - Effects of the combined North Railway construction and Tote activities on caribou calving
Reference	<ul style="list-style-type: none"> <li>• Mary River Project Phase 2 Proposal FEIS Addendum Project Description</li> <li>• Mary River Project Phase 2 Terrestrial Wildlife Technical Support Document, TSD 10, Sections 3.4.1.1</li> <li>• Baffinland (2017), Terrestrial Environment Mitigation and Monitoring Plan, Sections 3.3.1</li> <li>• Baffinland (2018), 2017 Mary River Project Terrestrial Environment Annual Monitoring Report</li> </ul>
Issue/Concern	<p>Baffinland (2018) acknowledges that “caribou will find some Project activities disturbing and it remains uncertain to what degree caribou will habituate to those disturbances. However, over the entire range of the north Baffin Island caribou, habitat effectiveness is predicted to be reduced by 2.4% during the calving season”.</p> <p>Baffinland (2018) anticipates that “the loss of calving habitat will be entirely from disturbance associated with the mine and is therefore reversible.</p> <p>The greatest disturbance to calving caribou habitat will be during the two-(three?) year period of the North Railway construction while the Tote Road is still active for hauling ore. However, actual effects during that period are expected to be negligible because the area is not currently occupied by caribou.</p> <p>Railway construction will not impact the entire railway route simultaneously; therefore, the largest magnitude effect will be reduced because of the small spatial extent (e.g., section of railway being constructed at any one time) and shorter duration (e.g., the construction period).</p> <p>Given the broad distribution of calving sites within the RSA, the assumed availability of alternative calving areas, and the minimal competition for calving areas, Baffinland is moderately confident that after mitigation the Project will not have a significant effect on calving caribou”.</p>



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	<p>It is understood that construction of the North Railway will require multiple laydown sites, three (3) mobile construction camps, and the exploitation and closure of approximately forty (40) quarries along the North Railway corridor. Blasting is anticipated to be a significant, regular activity associated with the construction of the North Railway.</p> <p>As previously noted although the likelihood of caribou and caribou calving occurring in the vicinity of the North Railway construction zone is relatively low, it is possible that calving could occur in the area. Baffinland (2018; Section 2.3.2.2, Map 8) noted that in 2009, caribou calving occurred within approximately 15 km of the North Railway and Tote Road corridor.</p> <p>Given the generally held view that cows and calves are typically most sensitive to human disturbances during and after the calving period, it will be important for Baffinland to be particularly diligent in effectively monitoring and implementing appropriate mitigation measures to minimize disturbance to caribou calving (if occurring) in the vicinity of the North Railway construction activities and the operating Tote Road during the spring calving season.</p> <p>Diligent monitoring and mitigation related to the protection of possible caribou calving activities will need to continue following construction of the North Railway when the combined North Railway and Tote Road are both in operation.</p>
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Information Request # 3	Baffinland is requested to provide further detail on anticipated monitoring to be undertaken and mitigation measures to be implemented to minimize the risk of caribou mortality for the first 5 years of combined North Railway and Tote Road operations.
Directed to	Baffinland
Subject	Terrestrial Wildlife and Habitat - Effects of the combined North Railway and Tote Road traffic on caribou mortality
Reference	<ul style="list-style-type: none"> <li>• Mary River Project Phase 2 Terrestrial Wildlife Technical Support Document, TSD 10, Sections 3.2.3, 3.4.1.3</li> <li>• Baffinland (2017), Terrestrial Environment Mitigation and Monitoring Plan, Sections 3.3.4</li> <li>• Baffinland (2018), 2017 Mary River Project Terrestrial Environment Annual Monitoring Report</li> </ul>
Issue/Concern	<p>Baffinland (2018, Section 3.2.3) acknowledges that “caribou mortality may increase as a direct result of the Phase 2 Proposal through collisions with vehicles (trains and automobiles)”.</p> <p>Baffinland has also predicted that “Increased mortality because of infrastructure or activities would result in reduced caribou abundance in the ZOI of the Project and the north Baffin Island caribou range. Therefore, avoiding caribou mortality due to project-related activities is important. Baffinland has implemented a Project-wide wildlife policy that has resulted in no direct mortality of caribou” (to date).</p> <p>Baffinland (2018, Section 3.4.1.3) states that “there are no known features of the Phase 2 Proposal that will reduce health to a level of increased mortality for the north Baffin Island caribou herd.</p> <p>An outstanding concern of communities related to mortality is how north Baffin Island caribou will react to the trains and steady traffic on the Tote Road, should caribou begin interacting with the Project again before the transition of ore haul to rail. It is generally an unknown among the knowledge-holders involved in workshops whether caribou will be aware of moving locomotives and be capable of getting off the rail tracks”.</p> <p>Baffinland (2018, Section 3.4.1.3) goes on to state that “regardless of that uncertainty, mitigation is possible because 1) caribou currently are in very low numbers and are seldom expected to be encountered along the rail routes, and 2) when the large numbers of caribou return, seasonal shut downs are possible to allow caribou to pass during migratory movements, should they occur. Additionally, the temporary increase in traffic in the Northern Transportation Corridor and the concomitant increase in mortality risk will be partially mitigated by the shorter-term transition to rail for transport of ore to Milne Inlet”.</p> <p>Regarding these points, it is our understanding that although the North Railway will transport ore to Mine inlet in lieu of ore trucks, all other vehicle traffic will continue to use the adjacent Tote Road. Thus, we agree</p>



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	<p>with the communities' concern related to how north Baffin Island caribou may react to the combination of regular train traffic and concurrent vehicular traffic (albeit reduced) on the Tote Road, which could lead to a greater risk of caribou mortality.</p> <p>As a result, it will be critically important for Baffinland to be particularly diligent in effectively monitoring and implementing appropriate mitigation measures to minimize the risk of mortality to caribou related to the combined North Railway and adjacent Tote Road operations.</p>
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Information Request #4	Baffinland is requested to provide detail on the potential visual disturbance effects and if there may be additive effects associated with the North Railway paralleling the Tote Road.
Directed to	Baffinland
Subject	Terrestrial Wildlife and Habitat – Visual Disturbance Effects of the combined North Railway and Tote Road on Caribou
Reference	<ul style="list-style-type: none"> <li>Mary River Project Phase 2 Terrestrial Wildlife Technical Support Document, TSD 10, Section 3.3.2, 3.4.1.2</li> </ul>
Issue/Concern	<p>The North Railway will parallel the Tote Road. Effects on caribou may be influenced by adjacent infrastructure and visual disturbances of the road and railway collectively.</p> <p>Baffinland did assess potential impacts based on the combined traffic volume of the Tote Road and North Railway, and the physical barrier (i.e., embankment and snow conditions) of the railway alone. However, did not address potential impacts associated with disturbances of the infrastructures combined (e.g., visual disturbances associated with the roadbed and railway traffic, or visual disturbances of both the road and rail beds combined). Rather Baffinland suggested traffic activity along the transportation corridor causes the disturbance, not the infrastructure itself based on a literature review completed by Reimers and Colman (2006).</p> <p>However, Reimers and Colman (2006) reference Wolfe et al. (2000), who found that caribou strongly avoided elevated roads that were a visual barrier.</p> <p>Potential combined effects of the railbed and or railway traffic in proximity to the Tote Road may augment potential movement effects described by Baffinland.</p>



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	<p>B. Details, with timelines, for future collecting, integrating, and verifying IQ for drafting mitigation/monitoring plans relevant to the Phase 2 Proposal</p> <p>C. Details, with timelines, for ground-truthing key environmental processes and species with IQ users (e.g. fish locations, caribou and other wildlife, vegetation sampling etc.)</p>
Directed to	Baffinland
Subject	Management Plans- Integration of IQ
Reference	<ul style="list-style-type: none"> <li>Volume 1 FEIS Addendum section 10.4, Table 10-4, starting at pg. 10.9 (pdf pg. 211 of 512)</li> <li>Volume 7 TSD 28 , Appendix Y, pdf pg. 177</li> </ul>
Issue/Concern	<p>Section 10.4 notes that changes to mitigation and monitoring plans will be ongoing throughout as well as outside of the regulatory process (p. 10.8). It is not clearly stated how IQ has updated any of the plans since approval or what specific steps will be taken to integrate IQ into updates/new plans.</p> <p>TSD 28 also describes the formation of the Community Advisory Group in Pond Inlet (now referred to as the Mary River Community Group - MRCG), which is intended to “provide an effective means to engage Elders and community members in order to have community-level input into the Baffinland monitoring programs and mitigation measures” (TSD 28 Appendix Y PDF p.177). Baffinland has not described how input from the MRCG has altered management plans since approval or described how they plan to work with the MRCG to complete updates.</p>





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Information Request #8	<p>It is requested that the Proponent:</p> <ol style="list-style-type: none"> <li>Confirm whether all ancillary facilities and activities locations are finalized and located within the PDA and if so provide further details on their location and required physical works and activities at these locations.</li> <li>Provide a detailed assessment of potential impacts to Cultural Heritage resources and Inuit land and resource use from all ancillary facilities and activities associated with the project.</li> <li>Identify all commitments to engaging Inuit in final siting and management planning and monitoring at any yet to be determined ancillary facilities and activity locations, and how IQ will be used to inform final siting decisions.</li> </ol>
Directed to	Baffinland
Subject	Socioeconomic - Culture, Resources, and Land Use – Project Description and Assessment Methods
Reference	<ul style="list-style-type: none"> <li>Volume 1, FEIS Addendum, Sections 1.2, 4.1.2, 4.3.1, and 8.3.11.8</li> <li>Volume 6, TSD 25, section 9</li> <li>Volume 7, TSD 28 appendix AA</li> </ul>
Issue/Concern	<p>When there are large amounts of activity of a yet-to-be defined (or located) nature identified in a Project Description, these features cannot be subject to a full and proper assessment. More information is required on all physical works and activities required to undertake the Phase 2 Project. Effects of ground disturbance to cultural heritage resources are noted as being limited to the PDA. The Proposed project will require railway excavations, blasting, borrow pits and quarries, and disposal of ice-rich soils in local depressions. Locations for railway crossings have not yet been determined. It is not clear whether all ancillary activities will be located within the PDA and if they have been assessed for potential impacts to cultural heritage resources.</p> <p>The potential for up to 30 quarries is identified at pdf pg. 123 of 512 (Table 1-1). Where are the quarries to be located and how will these areas be assessed?</p> <p>Is there a commitment to include Inuit in identification of sensitive landforms (Section 4.3.1; pg. 42 of 512) and definition of appropriate site-specific mitigations to protect them?</p>



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Information Request #9	<p>It is requested that the Proponent work with QIA and the affected Inuit communities to address gaps in the assessment of Culture, Resources, and Land Use by:</p> <ul style="list-style-type: none"> <li>A. Include consideration of the potential for psycho-social and stigma impacts alienating Inuit use within the PDA and Local Study Area</li> <li>B. Providing more information on return per unit of harvesting effort by Inuit and how this has changed over time since major development activities started on Mary River Mine</li> <li>C. Re-assessment of effects on Inuit land and resource use to include identification of preferred Inuit future use and potential long-term effects of the Project on those uses</li> </ul>
Directed to	Baffinland
Subject	Socioeconomic - Culture, Resources, and Land Use; Assessment Methods and Residual Effects
Reference	<ul style="list-style-type: none"> <li>• Project Summary, Table 1, pdf pg. 60 of 512</li> <li>• Volume 1, FEIS Addendum Section 4.1.2 and 8.3.11.8</li> <li>• Volume 6, TSD 25, section 9</li> </ul>
Issue/Concern	<p>A number of gaps and unsubstantiated assumptions exist in the Proponent's assessment of Inuit Culture, Resources, and Land Use, which reduce the confidence that can be held in their overall suggestion that "Results to date are consistent with FEIS predictions, suggesting, Inuit land use activities coexist with the Project, as local land users continue to access Project sites." (Section 8.3.11.8, pdf pg. 195 of 512). More detail is required of how the Proponent has come to this conclusion, whether there is adequate evidence to support such an assertion and the assumptions underlying it, and to provide a more nuanced portrait of whether this "coexistence" has had adverse effects on Inuit, and to what degree/magnitude.</p> <p>The Proponent assumes that given what it characterizes as the current limited range and low population of caribou, Inuit harvesting will not decrease significantly from the project (TSD 25, p.123). This assessment does not include characterization of Inuit preferred future use of caribou in the Project affected area.</p> <p>The Proponent claims harvesting will not require additional effort. However, baseline calculations of harvesting return per unit of effort are not provided. (TSD 25, p.123)</p> <p>Pdf pg. 60 of 512 (Table 1) predicts effects on culture land use and resources to be reversible in nature except for ground disturbance of physical cultural resources. No discussion of the effects of perceived risk, psycho-social impacts and stigma associated with industrialized areas is provided; these factors can have substantial impacts on the ability and willingness of indigenous peoples to harvest from Project affected</p>



**QIA INFORMATION REQUESTS TO NUNAVUT IMPACT REVIEW BOARD, PHASE II PROPOSAL**

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	<p>areas. The FEIS Addendum does not factor in or adequately characterize potential Inuit alienation associated with real and perceived concerns with dust, contamination, railway safety etc. How were changes to the landscape which would impact avoidance, perceived loss of use, perceived or actual contamination, considered?</p>
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**QIA INFORMATION REQUESTS TO NUNAVUT IMPACT REVIEW BOARD, PHASE II PROPOSAL**

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Information Request #10	<p>It is requested that the Proponent provide more information on the assessment of effects on vegetation, including:</p> <ul style="list-style-type: none"> <li>A. Identification of IQ based monitoring indicators and thresholds</li> <li>B. Identification of culturally valued plant species and communities of importance</li> <li>C. Provision of any data the Proponent has gathered related to willingness of Inuit to use vegetation in the PDA/LSA</li> <li>D. Provision of evidence of the integration of IQ in the selection of sampling locations</li> <li>E. Results of any TEK/IQ field studies</li> <li>F. Collection and meaningful consideration of IQ related to natural revegetation/regeneration</li> </ul>
Directed to	Baffinland
Subject	Vegetation - Integration of IQ
Reference	<ul style="list-style-type: none"> <li>• Volume 1, Section 8.2.2.2, pg. 8.4 and 8.5</li> <li>• Volume 4, TSD 9</li> <li>• Volume 5 TSD 14</li> </ul>
Issue/Concern	<p>IQ based traditional plant use studies are referred to in section 8.2.2.2. More details on how these were undertaken. It is not clear, for example, how many traditional use plant species are found within the PDA, or their degree of reliance upon these resources.</p> <p>Traditional Plant Use surveys were included in baseline investigations in 2007. The Proponent does not provide evidence that IQ has been meaningfully included <u>since</u> these studies. Consultation has occurred on concerns associated with vegetation (p. 43); however consultation is not equivalent to a robust traditional ecological knowledge/IQ study.</p> <p>Vegetation abundance and contaminant monitoring locations were selected based on habitat suitable for caribou foraging (TSD 9 section 2.4.2.1). No IQ indicators were evidently used in the identification of caribou habitat.</p> <p>Blueberry was identified as an indicator species for culturally important plants and for contaminant monitoring because it “can” be modelled, not based on IQ. Based on significance for this one species, which has low abundance in the LSA, no assessment for culturally valued vegetation was undertaken for Phase 2 components (TSD 9 section 3.3.3).</p> <p>Incidental observations of natural revegetation were recorded to inform the status and potential for revegetation of disturbed areas by native species in the Project area (p. 40). IQ based observations on natural revegetation have not been recorded or are not reported in the FEIS Addendum.</p>





**QIA INFORMATION REQUESTS TO NUNAVUT IMPACT REVIEW BOARD, PHASE II PROPOSAL**

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Information Request #11	It is requested that the Proponent provide more detail on how IQ was integrated in every step of the assessment conducted in the development of the FEIS Addendum. This should include some form of tabular description of how, specifically, IQ informed each step of the assessment methodology outlined in Section 9 of the FEIS Addendum.
Directed to	Baffinland
Subject	Socioeconomic – Engagement and Integration of IQ
Reference	<ul style="list-style-type: none"> <li>• Volume 1, Section 4.2.4, Public Consultation and IQ, pdf pg. 156 of 512</li> <li>• Section 9, Environmental Effects Assessment Methods, pdf pg. 196 of 512</li> <li>• Volume 3, TSD 4</li> <li>• Volume 6, TSD 25</li> </ul>
Issue/Concern	<p>At pg. 156 of 512 (Section 4.2.4, Public Consultation and IQ), the Proponent states that “IQ has been considered and incorporated in the TSDs and throughout the assessment.” It is not always readily apparent whether and how this is the case.</p> <p>Section 9, pg. 196 of 512 states:</p> <p>“The identification and assessment of environmental and social effects was based on the following steps:</p> <ul style="list-style-type: none"> <li>• Identification of major Project activities during each phase of the Project;</li> <li>• Identification of VECs/VSECs and selection of appropriate key indicators and measurable parameters;</li> <li>• Establishment of assessment boundaries;</li> <li>• Identification of Project interactions;</li> <li>• Identification of mitigation measures and EMPs to avoid, reduce or minimize potential effects;</li> <li>• Establishment of the framework for evaluating significance of residual impacts;</li> <li>• Determination of the potential for a residual effect, and if anticipated, its significance; and</li> <li>• Identification of monitoring plans and adaptive management strategies for incorporation into EMPs.”</li> </ul> <p>Each of the highlighted stages of the assessment could have been informed by IQ. The Proponent is requested to identify whether and specifically how IQ informed each step. For example, were any of the community workshops pertaining to effects assessment?</p>



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## QIA INFORMATION REQUESTS TO NUNAVUT IMPACT REVIEW BOARD, PHASE II PROPOSAL

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Information Request #12	Baffinland acknowledges additional community engagement will be necessary to fully satisfy public consultation requirements on the Phase 2 project proposal. When is this consultation scheduled to occur, and how will the results of this and additional data collection (e.g., on Inuit land and marine use) be integrated into a reassessment of effects from what is currently described in the FEIS Addendum?
Directed to	Baffinland
Subject	Socioeconomic - Engagement
Reference	<ul style="list-style-type: none"> <li>FEIS Addendum 3 – Phase 2 Community Workshops Report, page 13 of 237</li> </ul>
Issue/Concern	QIA needs more information on when this consultation is scheduled for, when this community engagement will be completed, and whether and how it and ongoing data collection – especially in regards to Inuit land and marine use and IQ – will be integrated into a reassessment of effects from what is currently in the FEIS addendum. There will need to be adequate time for meaningful consideration of feedback from Inuit communities and QIA prior to the hearing stage of this EA, so timelines are important to establish.



**QIA INFORMATION REQUESTS TO NUNAVUT IMPACT REVIEW BOARD, PHASE II PROPOSAL**

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Information Request #13	<p>The Proponent's primary data source for IQ data collection and Inuit land and marine use is through community workshops.</p> <p>A. Please identify whether and how this approach to data collection is appropriate in an Inuit context and identify other methods considered to gather cultural, traditional use, and IQ-related information and knowledge.</p> <p>B. Please also provide more information on how it engaged with communities in the identification of the process used to gather IQ and Inuit Land and Marine Use information.</p> <p>C. Identify what opportunities were Inuit given to determine what questions were asked and what topics were focused on in the workshops.</p>
Directed to	Baffinland
Subject	Socioeconomic – Culture, Resources and Land Use; Integration of IQ
Reference	<ul style="list-style-type: none"> <li>FEIS Addendum TSD 3 – Phase 2 Community Workshop Report, page 15 and 16 of 237</li> </ul>
Issue/Concern	<p>The proponent argues that workshop based data collection is efficient and enables the sort of communal decision making and consensus sometimes associated with the values within IQ. The Proponent focuses on the beneficial aspects of community workshops for data collection without fully identifying some of their limitations.</p> <p>What alternative data collection techniques did Baffinland consider, and if any, why were they not used to date? Discussion of their benefits and weaknesses in comparison with the “workshop” methods benefits and weaknesses is requested.</p> <p>Further and supported justification for the sole use of these workshops is important, especially in the context that it is widely acknowledged that Inuit traditions and behaviour predispose Inuit towards deferring to the knowledge of elders and to not voicing disagreement in an explicit way particularly in a public setting, where it might cause embarrassment or bad feeling. This could lead to estimates of communal convergence of opinion from such a setting being exaggerated. How was this cultural context considered by Baffinland when designing and choosing these data collection methods?</p> <p>The Proponent needs to provide more evidence to support its assertion that the workshop-open house model is the most appropriate for IQ data collection, or evidence/commitment of a revised approach that will inform a reevaluation of effects on Inuit culture and land and marine use.</p>



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**QIA INFORMATION REQUESTS TO NUNAVUT IMPACT REVIEW BOARD, PHASE II PROPOSAL**

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Information Request #15	How was the material chosen to be subject of verification workshops determined?
Directed to	Baffinland
Subject	Socioeconomic – Culture, Resources and Land Use; Integration of IQ
Reference	<ul style="list-style-type: none"> <li>FEIS Addendum TSD 3 – Phase 2 Community Workshop Report, page 16 of 237</li> </ul>
Issue/Concern	<p>“In the interest of time, only selected summary information was verified with meeting participants.”</p> <p>How were these selections of verification topics made? On what basis and by whom? The Proponent is requested to identify how it engaged the Inuit communities in the advance identification of the topics to be included in the “summary information” that drove the Workshops.</p> <p>Additionally, the proponent is asked to identify what time constraints were placed on the process of IQ data collection and how those time constraints could have been avoided, and can be avoided in future consultations? For example, could the consultations conducted with Inuit regarding marine and terrestrial landuse and IQ have commenced earlier? In the Proponents opinion, what additional information gathering and sharing steps are required prior to the end of the hearing process?</p>





**QIA INFORMATION REQUESTS TO NUNAVUT IMPACT REVIEW BOARD, PHASE II PROPOSAL**

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Information Request #16	Further justification for the chosen technique for “interpreting” IQ is required, as well as consideration of what role Inuit should be playing in “interpreting” IQ in the environmental assessment process and how Baffinland will support this.
Directed to	Baffinland
Subject	Socioeconomic – Culture, Resources and Land Use; Assessment Methods (integration of IQ)
Reference	<ul style="list-style-type: none"> <li>FEIS Addendum TSD 3 – Phase 2 Community Workshop Report, page 20-21 of 237</li> </ul>
Issue/Concern	<p>“Two types of data were collected in the workshops and open houses: verbal/textual data and spatial data... Data analysis was then accomplished through a form of associative analysis. In associative analysis, “the researcher looks for patterns, replication and linkages in the dataset” (GSRU 2007: 8:38). Data obtained from the workshops were thus analyzed to see if general themes emerged amongst the data sets and, if so, to qualitatively describe those themes.”</p> <p>This technique means that Inuit voices/IQ etc. does not speak for itself or in its own terms but through a process of elimination and distillation by an outsider. This pattern recognition system also appears predicated on the idea that the more common the knowledge the more valuable; outlier comments appear to be less valuable to the interpretative lens.</p> <p>How did Baffinland attempt to involve Inuit in establishing appropriate methods for effective IQ data gathering? Who conducted the data interpretation and what are their qualifications for interpretation of IQ-related topics? The Proponent is also requested to identify any inherent limitations to the “associative analysis” approach that may limit the confidence that can be held in the findings and the effects assessment that is predicated on these findings.</p>



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Information Request #17	Is the IQ information that has been gathered considered representative of the affected Inuit communities? What is considered to be a representative sample size from each community and how was this number arrived at?
Directed to	Baffinland
Subject	Socioeconomic; Assessment Methods
Reference	<ul style="list-style-type: none"> <li>FEIS Addendum TSD 3 – Phase 2 Community Workshop Report, pages 25 and 34 of 237</li> </ul>
Issue/Concern	<p>Page 25 of TSD 3 states: “Approximately 20 snow machine groups will travel to this area on the weekends and 10+ snow machine groups will travel to this area during the week.”</p> <p>Page 34 of TSD 3 states: “Aujaq was noted to be an important period for caribou hunting, with inland travel generally occurring by ATV. It was estimated that more than 10 groups of caribou hunters may head out per week (or perhaps even more than 20 groups), but not recently (i.e. summer 2015) because of caribou hunting restrictions that have been put in place by the government. Late August and September are the busiest months for caribou hunting in Aujaq.”</p> <p>Given these sorts of numbers of users from the communities, was participation in the IQ workshops or the original IQ study considered representative? How was representativeness determined in the IQ workshops and the original IQ study and what steps is the Proponent committed to in order to increase the representativeness of its IQ and traditional use information, if any?</p>



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Information Request #18	The Proponent is requested to provide more information on how IQ and Inuit observation is being incorporated into monitoring of project-specific and cumulative effects.
Directed to	Baffinland
Subject	Terrestrial Wildlife and Habitat; Environmental Monitoring (Integration of IQ)
Reference	<ul style="list-style-type: none"> <li>Project Summary, pdf pg. 35 of 512</li> <li>Table 7-2, pdf pg. 171 of 512</li> <li>FEIS Addendum TSD 3 – Phase 2 Community Workshop Report, pdf pg. 61 of 237</li> </ul>
Issue/Concern	<p>In the Project Summary (pdf pg. 35 of 512), the Proponent indicates that “At each of these stages community involvement is an important part of the process. An approach that emphasizes learning as you verify the effects of actions allows Baffinland to continuously improve and adapt quickly to changing conditions.”</p> <p>Despite this, in the FEIS Addendum, the emphasis on scientific monitoring suggests the Proponent assumes scientific monitoring of biophysical resources will capture any unanticipated impacts (p.77). The value and role of IQ-based monitoring is not adequately discussed.</p> <p>Further information is required on the Proponent’s support for and commitments to current and proposed Inuit on-territory monitoring and adaptive management mechanisms in relation to the project, separating between activities Inuit working for Baffinland conduct, and independent Inuit monitoring activities.</p> <p>Table 7-2 at pg. 171 of 512 of the FEIS Addendum indicates that Inuit ship observation monitoring was re-initiated in 2018. No reference is made to whether this will be extended into the rail and road construction and terrestrial operations end of the project. More information on full Proponent commitments to site-specific and transportation system Inuit monitoring is required.</p> <p>TSD 3 pdf pg. 61 of 237 - What systems are in place to monitor the impacts of project activities and respond to community observations – as in the case of the sculpin die-offs noted by Inuit hunters? How is Baffinland using the principles of IQ and adaptive co-management to effectively integrate and respond to the knowledge and observations of Inuit hunters and community members? p93/237 – The proponent is also asked to identify what tangible actions will be taken to alter monitoring programs to take on board the critiques offered by community members regarding HOL surveys and increasing surveying beyond the mine/project footprint into the broader area?</p>



**QIA INFORMATION REQUESTS TO NUNAVUT IMPACT REVIEW BOARD, PHASE II PROPOSAL**

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Information Request #19	How were Inuit community members involved in effects characterization and significance estimation exercises?
Directed to	Baffinland
Subject	Socioeconomic; Integration of IQ
Reference	<ul style="list-style-type: none"> <li>FEIS Addendum TSD 3 – Phase 2 Community Workshop Report, page 147 of 237</li> </ul>
Issue/Concern	<p>It remains unclear what role if any Inuit had in either effects characterization or significance estimation in the FEIS Addendum. This is problematic especially in the context of the following statement by the Proponent as to what the purpose of the FEIS Addendum is: “The purpose of the EIS is the assessment and determination of the significance of the residual effects and their acceptability to Inuit communities and the Project stakeholders.” (Section 9.6, pdf pg. 201 of 512). This suggests that the EIS itself should have adequate information to characterize the acceptability of residual effects to Inuit communities; there is no evidence that any Inuit community determination of what is acceptable is in the FEIS Addendum.</p> <p>The Proponent’s response should include consideration of the following related questions:</p> <p>Who conducted the effects characterization and significance estimation exercise for Baffinland in relation to culture and Inuit land and marine use?</p> <p>What qualifies them for this role, and why were Inuit community members and QIA not involved in that exercise?</p> <p>What role did IQ holders in this process of determining significance ?</p> <p>When or did Baffinland verify with their respondents, Inuit communities and QIA that their effects characterization methods were effective or appropriate? Did Inuit verify project interactions prior to the effects characterization and significance estimation process? How is IQ involved in determining the acceptability of impacts or the estimation of cumulative and residual impacts?</p>



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Information Request #20	Provide a discussion of whether and specifically how Baffinland's corporate policies, plans and programs recognize and adhere to Inuit laws and norms.
Directed to	Baffinland
Subject	Socioeconomic; Assessment Methods (Integration of IQ)
Reference	<ul style="list-style-type: none"> <li>• FEIS Addendum TSD 4 – Public Consultation, page 7-8 of 73</li> <li>• Section 11 of the FEIS Addendum – Sustainability Analysis (pdf pg 229 of 512)</li> </ul>
Issue/Concern	<p>Sustainable development as a concept has some close similarities with concepts underlying IQ and Inuit Laws and norms. This section makes no reference to either. The Proponent is requested to identify what Inuit maligarjuat (laws or more accurately "big things that must be followed") it considered when developing its proposed project, and whether the project impedes upon any of those laws, which include but are not limited to: 1. working for the common good and not being motivated by personal interest or gain; 2. living in respectful relationships with every person and thing that one encounters; 3. maintaining harmony and balance; and 4. planning and preparing for the future (Karetak and Tester: 2017, 3).<sup>1</sup></p> <p>As a result of the close linkage of the concepts of sustainability to Inuit laws and norms, the Proponent is requested to provide more information about how its policies and actions are in accordance/adherence to Inuit laws, norms, and societal values. For example, are there Inuit laws and norms that are being violated by the Project as proposed and how has the Proponent brought those laws and norms into its assessment?</p>

<sup>1</sup> Karetak, J., Tester, F., and S. Tagalik (eds) (2017). Inuit Qaujimajatuqangit: What Inuit Have Always Known to be True. Halifax: Fernwood Publishing.





**QIA INFORMATION REQUESTS TO NUNAVUT IMPACT REVIEW BOARD, PHASE II PROPOSAL**

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Information Request #21	Please provide more information on what caribou crossings will look like, where they will be located, and provide supporting evidence for assertions that the railway will not prove a substantial barrier to caribou movement.
Directed to	Baffinland
Subject	Terrestrial Wildlife and Habitat; Project Description
Reference	<ul style="list-style-type: none"> <li>• FEIS Addendum TSD 4 – Public Consultation, pdf pg. 27 of 73</li> <li>• FEIS Addendum TSD 10 - Wildlife Baseline and Impact Assessment, pdf pg. 2 of 134</li> </ul>
Issue/Concern	<p>TSD-4 notes that there will be multiple caribou crossings areas in relation to the proposed railway, of an as yet unknown site/shape/location. In order for QIA and Inuit communities to better understand whether these caribou crossings pose a significant barrier to wildlife mobility/migration, we need clarification around what those will look like and where they will be.</p> <p>TSD 10 states: “The Tote Road and North Railway do not intersect known traditional caribou movement corridors including caribou crossings and are therefore not expected to present substantial barriers to caribou movement.”</p> <p>This statement seems to be contradicted by the IQ maps presented in this and other volumes including in this TSD 10 on pdf pg. 27 of 134, which indicates the strong likelihood of caribou movement through the area and indeed across the project footprint, as well as maps like the movement map (pdf pg. 30 of 134), Map 4: Caribou Migration based on IQ Studies, and the calving grounds identified in Map 5: Caribou Calving areas based on IQ studies and past surveys.</p> <p>The Proponent is requested to address these inconsistencies and provide more evidence including from literature and case studies of the effects of long linear disturbances on barren ground caribou. In addition what does IQ and TK say about caribou and infrastructure interactions?</p>



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Information Request #22	Why were the mapping techniques and scales used by the proponent in community workshops chosen? What alternatives were considered and what are the pros and cons of alternative mapping methodologies?
Directed to	Baffinland
Subject	Socioeconomic – culture and Inuit land and marine use; Existing conditions and baseline – Integration of IQ
Reference	<ul style="list-style-type: none"> <li>FEIS Addendum TSD 5 - Mapbook</li> </ul>
Issue/Concern	<p>The coarse mapping scale and lack of discernable attribution used makes verification and accuracy difficult, weakening the quality of the data and the ability to interpret it. Non-exclusive examples from TSD 5 include: Pdf pg. 50 of 58 shows ‘ocean resource collection areas’. The lack of attribution and poor accuracy mean that there is no way of saying where things are being gathered, or even what is being gathered in many sites. Lines wander from the offshore to the terrestrial despite the fact that they are meant to represent a marine resource.</p> <p>Pdf pg. 15 of 58 shows a map of “Special Places – Project Study area, workshop results’. There are points and polygons within the study area that are unlabeled. Consistently throughout many of these maps there are sites that seem to lack vital attributes making any estimation of their significance or potential impacts from the project etc., difficult to impossible.</p> <p>Community members cannot be expected to be able to offer accurate spatial analysis when the map scales used are so coarse. Accurate and defensible effects assessment is difficult when so much spatial data is unattributed or improperly described. How does Baffinland propose to alter or remedy these issues in future consultations and data gathering?</p>



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Information Request #24	What does IQ have to say about the relative abundance of carnivore populations?
Directed to	Baffinland
Subject	Terrestrial Wildlife and Habitat; Integration of IQ
Reference	<ul style="list-style-type: none"> <li>Mary River Phase 2 EIS with appendices –Section 8 – Existing Conditions (page 176/512)</li> </ul>
Issue/Concern	How was community feedback and IQ integrated into the estimations of carnivore abundance conducted for the terrestrial ecology baseline studies? What does it tell us?

Information Request #25	How was IQ integrated or used to determine VEC's?
Directed to	Baffinland
Subject	Socioeconomic- Culture and Inuit Land and Marine Use; Integration of IQ
Reference	<p>FEIS Addendum –</p> <ul style="list-style-type: none"> <li>Section 4.2 Valued Socio-economic Components (pdf pg. 41 of 512)</li> <li>Section 9 – Environmental Effects Assessment Methods (pdf pg. 197 of 512)</li> </ul>
Issue/Concern	What role did Inuit communities play in the development of VECs? How were Inuit communities engaged in this process of VEC determination? How were cultural changes or impacts to Inuit perceptions of health, well-being, cultural continuity, food security, or opportunities for intergenerational knowledge transfer considered in the VECs?



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Information Request #26	How was IQ used to inform ice conditions assessment including open water timing?
Directed to	Baffinland
Subject	Marine Environment, Marine Water/Ice and Sediment Quality - Existing Conditions and Baseline
Reference	<ul style="list-style-type: none"> <li>Mary River Phase 2 EIS – TSD 16 – Ice Conditions Report (page 17/124)</li> </ul>
Issue/Concern	<p>It is not clear from the FEIS Addendum whether and how Inuit community members were involved in baseline conditions characterisations or effects assessments that took into account the impacts of climate change.</p> <p>How was Inuit knowledge and IQ used to evaluate long-term ice conditions, changes in ice location, and depth as well as potential impacts on ice due to project interactions?</p>





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## QIA INFORMATION REQUESTS TO NUNAVUT IMPACT REVIEW BOARD, PHASE II PROPOSAL

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Information Request #28	<p>It is requested that the Proponent provide more information on how it calculated “community acceptability” as a criterion in the assessment of alternatives – who conducted this exercise, how was “community acceptability” calculated, and what role – if any – have Inuit communities played in this calculation?</p> <p>In addition, more detailed information is required on the perspectives of Inuit on some of the proposed alternative means.</p>
Directed to	Baffinland
Subject	Project Description (Project Alternatives); Integration of IQ
Reference	<ul style="list-style-type: none"> <li>• Section 6 (Project Alternatives), pg. 6.1; pdf pg. 165 of 512</li> <li>• TSD 01 (Alternatives Analysis), pdf pg. 5 of 22; and Table 1.1 (Assessed Alternatives)</li> </ul>
Issue/Concern	<p>Given that some of the alternative means chosen by the Proponent for Phase 2 may have substantial implications for Inuit (e.g., increased ship size, increased shipping season, expanded port infrastructure, a railway bisecting North Baffin), it is critical that Inuit are meaningfully involved in the assessment of alternative means to undertake the Project.</p> <p>Section 6 states that Baffinland has considered various alternative means to undertake the Project but does not discuss what role if any Inuit had in the alternatives assessment.</p> <p>TSD 01, at pdf pg. 5 of 22, suggests that Inuit perspectives on alternative means to undertake the project were sought through consultation forums (public meetings and workshops). However, Table 1.1 appears to be an internal exercise by the Proponent, without community verification of the critical “Community Acceptability” criterion for each alternative means considered.</p> <p>This raises issues about whether Baffinland has meaningfully engaged Inuit in consideration of alternatives prior to determining appropriateness of preferred alternative means. More information is required about who conducted the alternatives assessment and what role, if any, Inuit played in determination of “Community Acceptability”. We agree that determination of “community acceptability” is by definition subjective (TSD 01; pdf pg. 5 of 22) as is the determination of significance of impacts itself. This recognition requires that the people affected by the Project must be intricately involved in the determination of “community acceptability”.</p> <p>In order to provide a better understanding of Inuit perspectives on alternative means, the Proponent is requested to provide detailed notes on each of the following issues, with all community inputs from meetings and workshops to date:</p> <ol style="list-style-type: none"> <li>A. Inuit perspectives on increased shipping season and larger ships</li> <li>B. Inuit perspectives on building and operating a railroad through tundra and effects on caribou and traditional use</li> </ol>



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	C. Inuit perspectives on expanding the Milne port facility
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Information Request #29	It is requested that the Proponent show more evidence to support its “sustainability analysis”, especially whether and how it integrated IQ and the Inuit worldview overall into this assessment.
Directed to	Baffinland
Subject	Socioeconomic – Engagement and Integration of IQ; Assessment Methods
Reference	<ul style="list-style-type: none"> <li>FEIS Addendum, Section 11 (Sustainability Analysis); pgs. 11.1 to 11.3</li> </ul>
Issue/Concern	<p>Section 11 includes a very short (three page) sustainability assessment. Table 11-1 provides a summation of the Proponent’s perspective on the Project’s potential contributions to sustainability based on the Proponent’s definition of sustainability, with limited to no actual evidence provided to support the assertions made.</p> <p>The Proponent is requested to identify whether it has engaged Inuit on their definition of sustainability and if not, to conduct this exercise in order to support a joint reconsideration of effects of the Project on sustainability from an Inuit perspective. Factors such as protection of culture in all its manifestations, long-term food security, and adherence to Inuit laws and norms, likely will need to be considered.</p>



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Information Request #30	It is requested that the Proponent provide further detail to support its assertion that there will likely be more beneficial effects on harvesting than negative outcomes from the Mary River Mine Project overall.
Directed to	Baffinland
Subject	Socioeconomic – Culture, Resources and Land Use; Assessment Methods and Residual Effects
Reference	<ul style="list-style-type: none"> <li>FEIS Addendum Section 7 Concerns of the Communities; pdf pg. 47 of 512</li> </ul>
Issue/Concern	<p>The following statement is made by the Proponent: “Concerns were expressed on the overall effect of the Phase 2 Proposal or the Approved Project on harvesting and land-use activities that could arise from the combined interactions of the Phase 2 Proposal or the Approved Project on a wide range of factors. These interacting effects have been carefully considered and the potential for beneficial outcomes on harvesting activities appears to be more likely than overall negative outcomes.”</p> <p>More evidence and the Proponent’s rationale is required in order for QIA, the Inuit communities and NIRB to consider the accuracy of this statement. Please provide more detail on both the adverse effects and benefits calculated by the Proponent in making this assertion and identify whether and how Inuit were involved in the “consideration” referred to above, and if Inuit were not involved, who came to this estimation of net benefits to Inuit harvesting and on what basis.</p>





**QIA INFORMATION REQUESTS TO NUNAVUT IMPACT REVIEW BOARD, PHASE II PROPOSAL**

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Information Request #31	It is requested that the Proponent provide more information on how Inuit sensory observations were integrated into the development of Local Study Areas for specific VECs and VSECs, in the collection of baseline and change over time data, and in the development of thresholds of measurable change and acceptable change, respectively.
Directed to	Baffinland
Subject	Socioeconomic – Culture, Resources and Land Use ; Engagement, Assessment Methods and Integration of IQ
Reference	<ul style="list-style-type: none"> <li>FEIS Addendum, Section 8.2.1.3 (Noise and Vibration); pdf pg. 175 of 512</li> </ul>
Issue/Concern	<p>Sensory observations are among the primary and most crucial of impacts in Inuit choices on whether and where to go for harvesting activities. IQ is a form of knowledge passed between generations, which relies heavily on these observations to keep Inuit fed and safe on the land, water and ice. Any impact assessment on Inuit needs to seriously integrate sensory data and assessment metrics that are calibrated to this very sensitive form of knowledge.</p> <p>It is unclear the degree to which the Proponent has integrated Inuit sensory observations or metrics into its assessment. For example, it is unclear whether the Local Study Areas for specific VECs and VSECs are calibrated to account for the distance from Project-related activities where any form of sensory disturbance to Inuit is likely to be encountered – visually, auditorially (noise and vibration), smells/odors, among other considerations.</p> <p>For an additional example, no evidence is provided that Inuit were involved in establishing thresholds and indicators in relation to noise and vibration.</p> <p>The Proponent is requested to clarify whether and how Inuit sensory values were integrated into LSA development and identification of appropriate thresholds of both measurable change (at what point, for example, can Inuit notice a difference in noise or vibration levels) and acceptable change (at what point is a change no longer considered acceptable – i.e., significant).</p>



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Information Request #33	The American Railway Engineering and Maintenance of Way Association (2010) guideline is proposed to be used for the design and management of culverts along the North Railway. How does this guideline consider the cold climate and environment experienced at the Mine?
Directed to	Baffinland
Subject	Hydrology and Hydrogeology Groundwater/Surface Waters Environmental Mitigation and Management
Reference	<ul style="list-style-type: none"> <li>EIS, page 4.3</li> </ul>
Issue/Concern	It is uncertain how the design and management guideline proposed for culverts considered the environmental setting for northern conditions.

Information Request #34	When and where will the airstrip at Milne be constructed? A map that shows the proposed airstrip location at Milne should be provided.
Directed to	Baffinland
Subject	Landform Soils and Permafrost Project Description
Reference	<ul style="list-style-type: none"> <li>EIS, Section 4.1.5, page 4.7</li> </ul>
Issue/Concern	The Milne Port airstrip is deferred to be constructed at a future time. Its location and time for construction is unknown.
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Information Request #35	Provide a description of the closure and reclamation approach for the norther rail components (e.g., embankment, culverts, bridges, access roads, quarries, etc.), as well as, any adjustments completed to the Tote Road that are Phase 2 specific. Additionally, for each component, identify the residual landform and aesthetic condition that will remain at closure.
Directed to	Baffinland
Subject	Landform Soils and Permafrost Water Licence, including relevant sections Regulatory Regime
Reference	<ul style="list-style-type: none"> <li>EIS, Section 4.1.6, page 4.7</li> </ul>
Issue/Concern	<p>The scope of the current ICRP.</p> <p>Baffinland states that the current ICRP includes all elements of the Phase 2 Proposal is already captured in the approved ICRP. This statement is incorrect. Baffinland should clarify the current Project scope in the approved ICRP and what components of the Phase 2 Proposal are in the current ICRP (if any).</p> <p>To avoid uncertainty in referencing an ICRP for the current Project, not the proposed Phase 2 Proposal, additional information should be provided to describe how each of the Phase 2 Proposal components will undergo closure and reclamation.</p>



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Information Request #38	How was a 40 m corridor width on each side of the rail selected? If applicable, detail if this distance is associated with an impact assessment prediction.
Directed to	Baffinland
Subject	Landform Soils and Permafrost Regulatory Regime
Reference	<ul style="list-style-type: none"> <li>EIS Section 9.3.1, Phage 9.29</li> </ul>
Issue/Concern	A 40 m corridor on each side of the rail is used to determine the project development area. The basis for this distance is uncertain. The corridor width will be used to inform any adjustments to the current Commercial Lease and potentially the signed Water Compensation Agreement as well as project monitoring design.

Information Request #39	Provide the exact time for updates to management, mitigation and management plan, as this is currently uncertain.
Directed to	Baffinland and NIRB
Subject	Regulatory Regime Environmental Mitigation and Management
Reference	<ul style="list-style-type: none"> <li>EIS Section 10.4.2, page 10.9</li> </ul>
Issue/Concern	<p>Various management, mitigation and monitoring plans are proposed to be updated. For each plan to be updated, it is unknown when reviewers can expect to review the information. It is uncertain if this can be expected during the permitting or licencing review process, or after approvals. Clarification on the timing of plan updates is necessary.</p> <p>QIA has 5 years of operational experience elated to Mary River. Much of that experience has been devoted to ensuring the Baffinland develops and implements detailed management plans. Given that the project already exists, that management plans already exist, that operational experience with management plans exists QIA requests that updated management plans be presented as part of the formal review of the Phase II Proposal. Accepting a permitting scenario whereby this work is deferred after the NIRB process undermines the ability to effectively assess impact management. Based upon QIA's operational experience with the Mary River Project, addressing these issues upfront, and in detail, is suitable given the status of the Mary River Project.</p>



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Information Request #40	What mitigations will be applied to limit affects to sensitive landforms during construction of the rail and road? What adaptive management triggers and thresholds will be applied to limit potential effects from occurring?
Directed to	Baffinland
Subject	Landform Soils and Permafrost Environmental Mitigation and Management
Reference	<ul style="list-style-type: none"> <li>TSD 09, page 5</li> </ul>
Issue/Concern	Road and railway construction have potential to affect sensitive landforms. The specific mitigations and monitoring to be applied to limit this occurrence are uncertain.

Information Request #41	For each km along the northern rail alignment, provide a graph depicting volume of cuts and volume of fill materials that will be required to construct the road/rail.
Directed to	Baffinland
Subject	Landform Soils and Permafrost Water Licence, including relevant sections Regulatory Regime
Reference	<ul style="list-style-type: none"> <li>TSD 08, page10</li> </ul>
Issue/Concern	North rail construction and tote road construction is to involve considerable quarrying and cutting through rock. There is uncertainty in the magnitude of the cutting and filling that is required along the rail alignment. Select locations may be more sensitive than other and could require additional mitigations if cutting / filling is large in magnitude.



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Information Request #42	A. When will the final design of the rail embankment and associated geotechnical/thermal analysis be completed? B. Will thermal modelling be completed for each bridge abutment and major water crossing?
Directed to	Baffinland
Subject	Landform Soils and Permafrost Environmental Mitigation and Management
Reference	• TSD 08, page 14
Issue/Concern	As part of the design of the rail, thermal modelling is proposed for the embankment. The final design of the embankment is not complete to assess details.

Information Request #43	Describe the adaptive management program that will be applied to the northern rail to address settlement concerns for the northern rail.
Directed to	Baffinland
Subject	Landform Soils and Permafrost Environmental Mitigation and Management
Reference	• TSD 08, page 16
Issue/Concern	An adaptive approach is proposed to identify and address issues such as settlement once the rail has been constructed. The triggers and threshold to apply are unknown.



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Information Request #44	Provide on a map of the locations of the borrows identified in Table 2.3.
Directed to	Baffinland
Subject	Landform Soils and Permafrost Environmental Mitigation and Management
Reference	• TSD 08, page 16
Issue/Concern	Borrows that require reclamation next to the northern rail are listed in Table 2.3; however, their locations are unknown.

Information Request #45	If PAG rock is encountered in a rock cut area; how will the PAG rock removed from the cut be managed/ utilized?
Directed to	Baffinland
Subject	Freshwater Aquatic Environment Environmental Mitigation and Management
Reference	• TSD 08, page 17
Issue/Concern	It is unknown how PAG rock removed from a cut will be used/managed. Inappropriate practices have potential to impact the freshwater quality if acid generation or metal leaching occurs. Baffinland has had issues with managing PAG rock, resulting in exceedances with approvals for the current Project.



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Information Request #46	<p>A. Describe what geotechnical information remains to be collected to address uncertainty with regards to thaw settlement along the rail.</p> <p>B. Please provide on a map where additional information need to be collected?</p>
Directed to	Baffinland
Subject	Landform Soils and Permafrost Environmental Mitigation and Management
Reference	<ul style="list-style-type: none"> <li>TSD 08, page 20</li> </ul>
Issue/Concern	Uncertainty with regards to thaw settlement along the rail is proposed to be addressed through additional geotechnical investigations. The specific items to address in these investigations, and the locations to complete this work is unknown.

Information Request #47	<p>A. Will the Tote Road and north rail culverts be design and constructed with the same design criteria? For example, will the Tote Road culverts located adjacent to the rail be upgraded to the 1 in 200-year storm event?</p> <p>B. What are the potential interactions with regards to water management that could occur between the Tote Road and the rail?</p>
Directed to	Baffinland
Subject	Hydrology and Hydrogeology Groundwater/Surface Waters Environmental Mitigation and Management
Reference	<ul style="list-style-type: none"> <li>TSD 13 page 8</li> </ul>
Issue/Concern	Part of the northern rail will be position adjacent to the Tote Road. The rail culverts are being designed for 1 in 200-year storm event. The interactions between the existing Tote Road culverts and the rail culverts are unknown.





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Information Request #48	Describe why pit water quality and waste rock drainage are not considered in the effects assessment for water quality.
Directed to	Baffinland
Subject	Freshwater Aquatic Environment Assessment Methods
Reference	<ul style="list-style-type: none"> <li>TSD 13 page 29</li> </ul>
Issue/Concern	The effects assessment for water quality does not consider the rate of pit development and waste rock generation will increase as a result of more ore mined per year (30 Mtpa versus, 22 Mtpa). It is uncertain why pit water quality and waste rock drainage are not considered in the effects analysis. Are the size of the pit and waste rock pile that same between the ERP and Phase 2 proposals?

Information Request #49	Describe the temporary construction facilities anticipated for the Phase 2 Proposal to ensure they are scoped into the effects assessment and not require further evaluation as part of the licensing process.
Directed to	Baffinland
Subject	Landform Soils and Permafrost Water Licence, including relevant sections Project Description
Reference	<ul style="list-style-type: none"> <li>TSD 02 page1.4</li> </ul>
Issue/Concern	Temporary construction facilities are proposed for construction. The type of temporary facilities is uncertain and not described. Reference is made to the FEIS but unknown if these facilities would be sufficient for Phase 2. Further without a detailed cross-reference, it is uncertain what are the temporary construction facilities.



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Information Request #51	<p>A. Describe the final operating design configuration of the Tote Road for locations not associated with the railway crossings. Provide a typical design or reference to a design report, if available</p> <p>B. The current condition and construction of the Tote Road is not in accordance with Issued for Construction (IFC) design provided as part of the ERP project. What is the plan and timing for road upgrades to achieve the IFC design?</p> <p>C. If Tote Road is not constructed to achieve the IFC design, describe how it will perform when subject to increased trucking as proposed in the Phase 2 application.</p>
Directed to	Baffinland
Subject	<p>Air Quality</p> <p>Hydrology and Hydrogeology</p> <p>Groundwater/Surface Waters</p> <p>Landform Soils and Permafrost</p> <p>Water Licence, including relevant sections</p> <p>Project Description</p>
Reference	<ul style="list-style-type: none"> <li>TSD 02 page 1.13</li> </ul>
Issue/Concern	Upgrades and minor realignments are proposed for the Tote Road to facilitate railway crossings. Apart from these crossing locations, it is uncertain if the Tote Road will be further adjusted from its current operating condition.



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	been to utilize the Tote Road that has not been constructed to meet the IFC presented as part of the ERP. Such practice can result in impacts and require additional monitoring/mitigations.
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Information Request #56	QIA requests that the Proponent clarify terminology used to describe flights and trips.
Directed to	Baffinland
Subject	Terrestrial Wildlife and Habitat, Freshwater Aquatic Environment, Marine Wildlife and Marine Habitat - Project Description
Reference	<ul style="list-style-type: none"> <li>TSD 2 - Project Description, Appendix C. Phase 2 Key Facts Table</li> </ul>
Issue/Concern	Language describing transportation movements requires clarification to ensure that Project activity levels are properly understood when assessing impacts. In particular, are the flights per year (p. 1 of 3), trips/week by service vehicle traffic (p. 2 of 3), railway trips/day and trips/week (p. 2 of 3), and shipment trips/day and trips/week (p. 3 of 3) one-way or round trips?





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Information Request #59	QIA requests that the Proponent provide a direct comparison of dustfall measurements and modelling estimates at monitoring sites (Mine site, tote road, Milne Port) under baseline conditions and during the ERP (4.2Mt/a now 6MT/a) with those expected during peak Phase 2 truck traffic (12Mt/a) or identify where such a comparison is provided in the EIS.
Directed to	Baffinland
Subject	Freshwater Aquatic Environment – Environmental Mitigation and Management
Reference	<ul style="list-style-type: none"> <li>TSD 14 - Freshwater Biota and Habitat Assessment, Sec. 2.5 Effects Assessment, Table 2-3, p. 14 and 15 (p. 23 and 24 of 120)</li> </ul>
Issue/Concern	The proposed Phase 2 trucking would greatly increase truck traffic along the tote road but dust emissions are predicted to remain “within the same magnitude of effects assessed previously for this pathway.” (TSD 14, p. 15). However, the relationships between baseline dustfall (i.e., magnitude), dustfall observed during peak ERP trucking (4.2Mt/a), and dustfall predicted during peak Phase 2 trucking (12Mt/a) are not clear. Nor is it clear whether the levels of interaction between project infrastructure or activities and freshwater biota and habitat in Table 2-3 (TSD 14, p. 14) are based on ore haulage of 6Mtpa as shown or 12Mtpa as proposed? This information is needed to properly assess Project impact predictions.



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	<p>noise propagation) would overlap with a key period for narwhals in Milne Inlet. Information presented elsewhere in the Addendum suggests the latter (TSD 24, Sec. 2.5.2.2, Table 2.4, p. 24) shows the estimated maximum number of ore carrier calls (round-trips) at Milne Port during Phase 2. In the table, Supramax and Panamax vessels are scheduled for July, but Cape size vessels are not scheduled until August.</p> <p>A better understanding of the relative availability of different vessel sizes and ice classes would provide information on scheduling opportunities that could be informative for assessing potential impacts and identifying mitigation needs and opportunities.</p>
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Information Request #68	QIA requests a copy, or information on the location of, the ice design criteria report for the proposed ore dock.
Directed to	Baffinland
Subject	Marine Environment, Marine Water/Ice and Sediment Quality - Project Description
Reference	<ul style="list-style-type: none"> <li>TSD 02 - Project Description, Appendix F: Ore Dock No 2, Sec. 3.1 Ice conditions</li> </ul>
Issue/Concern	<p>The Project Description (TSD 02, App. F, Sec. 3.1) states that “[i]ce conditions have been assessed and the related method constraints reviewed in the ice design criteria report (Croasdale and Allyn, 2017). There is no Literature Cited section in App. F, and the citation for this ice design criteria report is thus not available. QIA requests that the citation for this report be provided, along with a copy of the report or the location on the NIRB Public Registry (assuming it is publicly available). The information in this report (ice design criteria report - Croasdale and Allyn, 2017) may provide important information for the assessment of potential impacts of the construction of a new ore dock.</p>



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Information Request #73	QIA requests that the Proponent clarify why data on the number of species and their abundances in the ballast water of Project vessels was not collected to inform the invasive species risk assessment.
Directed to	Baffinland
Subject	Marine Wildlife and Marine Habitat - Assessment Methods
Reference	<ul style="list-style-type: none"> <li>TSD 21 - Risk Assessment for Introduction of Aquatic Invasive Species from Ballast Wa[ter],</li> </ul>
Issue/Concern	Golder (TSD 21, pg. 17 of 24) noted that using the actual number of species and abundance of aquatic invasive species present in each ship's ballast water would have reduced uncertainty related to invasive species risk but that this was not possible. Information on why this was not possible, given that Project vessels have been releasing ballast water at Milne Port for a number of years, is needed to inform our understanding of risk, mitigation, and monitoring of non-indigenous species introduced by Project vessels to Milne Inlet.



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Information Request #76	QIA request that the Proponent clarify whether any non-indigenous species, invasive or otherwise, have been collected during Project studies conducted up to and including the 2018 field season.
Directed to	Baffinland
Subject	Marine Wildlife and Marine Habitat - Environmental Monitoring
Reference	<ul style="list-style-type: none"> <li>TSD 17 - Marine Environmental Effects Assessment, Sec. 3.3 Project monitoring, p. 41 (p. 53 of 160)</li> </ul>
Issue/Concern	The Proponent states, "no invasive species have been detected as a result of AIS monitoring studies conducted up to the 2016 field season (T. Macdonald, pers. comm.)." Non-indigenous species do not necessarily have to be invasive to cause harm if, for example, they carry foreign diseases and parasites. Information on non-indigenous species found by Project studies up to and including the end of the 2018 field season is needed to properly assess risk related to ballast water discharges by Project vessels and the adequacy of proposed mitigation and monitoring.

Information Request #77	QIA requests clarification as to why shipping interactions with seabirds are scored as a Subject of Note and not a Key Interaction.
Directed to	Baffinland
Subject	Marine Wildlife and Marine Habitat - Assessment Methods
Reference	<ul style="list-style-type: none"> <li>Main Document, Appendix G. Interaction Summary Tables, Table G4. Effects Interaction Matrix - Shipping</li> </ul>
Issue/Concern	In the Main Document (App. G, Table G4) interactions with marine birds from shipping (Sealifts, ore carriers) are scored "1" (Subjects of Note) versus "2" (Key Interaction) as indicated for all marine mammal indicators. While potential effects are different (e.g., vessel-generated noise is not a concern for seabirds), vessel interactions such as accidental spills, collisions, and visual disturbance are still possible. As such, QIA requests clarification on why shipping interactions were scored as a Subject of Note, and not a Key Interaction, in the effects assessment.



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Information Request #78	QIA requests clarification as to why marine mammals were not included in the sustainability analysis of the Phase 2 Proposal.
Directed to	Baffinland
Subject	Marine Wildlife and Marine Habitat - Project Description; Assessment Methods
Reference	<ul style="list-style-type: none"> <li>Main Document Sec. 11 Sustainability Analysis, Table 11-1 Sustainability Analysis for the Phase 2 Proposal, pp. 11.1-11.2</li> </ul>
Issue/Concern	In the Addendum Main Document (Sec. 11, Table 11-1, pp. 11.1-11.2) marine habitat and biota, including fish, are included, but marine mammals are not. Why are marine mammals not included in this table? Potential effects on marine mammals are a particular concern to residents of impacted communities.





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Information Request #79	QIA seeks information on how the Regional Study Area (RSA) for marine mammals can adequately assess the potential for direct and indirect incremental effects on narwhal, given uncertainty about discreteness of the putative Eclipse Sound and Admiralty Inlet summer stocks.
Directed to	Baffinland
Subject	Marine Wildlife and Marine Habitat - Assessment Methods
Reference	<ul style="list-style-type: none"> <li>TSD 24 - Marine Mammal Effects Assessment, Sec. 1.2.2 Spatial and Temporal Boundaries, and Appendix A Marine Mammal Baseline Report, Sec. 3.1.3.1 Population Status and Abundance</li> </ul>
Issue/Concern	<p>The Regional Study Area (RSA) for marine mammals “encompasses all waters of Milne Inlet, Navy Board Inlet, Tremblay Sound, Eclipse Sound and Pond Inlet extending to the entrance of Baffin Bay, consistent with the Nunavut Settlement Area Boundary” (TSD 24, Sec. 1.2.2, p. 4; also see Figure 1.4, p. 6). The RSA is defined as “the area where there is potential for direct and indirect incremental effects from Project shipping on marine mammals.”</p> <p>Given evidence for movements between the putative Admiralty Inlet and Eclipse Sound narwhal summer stocks, as defined by DFO (see e.g., TSD 24, Appendix A, Sec 3.1.3.1, p. 24), how can an assessment that doesn't include Admiralty Inlet fully capture the “potential for direct and indirect incremental effects from Project shipping” on narwhals?</p>



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Information Request #80	QIA requests that the Proponent clarify where bearded seal, one of the Key Indicators for the Marine Mammal VEC, has been assessed, or if it has not, provide information to support exclusion.
Directed to	Baffinland
Subject	Marine Wildlife and Marine Habitat - Assessment Methods
Reference	<ul style="list-style-type: none"> <li>• Main Document, Sec. 4.3.1 Project Effects on VECs and Appendix C - Popular Summary</li> <li>• Appendix I, FEIS Addendum Vol. 2., Sec. 3 Assessment Methodology</li> </ul>
Issue/Concern	<p>The Addendum Main Document Sec. 4.3.1 (p. xi) states that “[e]ffects of Phase 2 Proposal activities were assessed for... bearded seal...”. The Popular Summary (Main Document - Appendix C, p. 12) also notes that bearded seal was assessed, and p. 13 summarized “predicted impacts” to this species. However, no effects assessment for bearded seal is otherwise reported in the Addendum materials, including the remainder of the Main Document and TSD 24 (Marine Mammal Effects Assessment).</p> <p>In Appendix I of the Main Document (FEIS Volume 2, Section 3: Assessment Methodology, Sec. 3.5.1 Identification of Valued Components), bearded seal is included among the list of Key Indicators for the Marine Mammal VEC. All of the other species have been assessed in the Addendum. Bearded seal is a species of cultural and social significance to Inuit. It occurs in the RSA in sufficient numbers to warrant assessment as a Key Indicator for the Marine Mammal VEC. Assessing the potential effects of the Phase 2 Proposal in detail requires information on Project interactions with the full suite of identified marine mammal indicators.</p>



**QIA INFORMATION REQUESTS TO NUNAVUT IMPACT REVIEW BOARD, PHASE II PROPOSAL**

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Information Request #81	QIA requests additional information and clarity on the marine mammal effects assessment for Atlantic walrus.
Directed to	Baffinland
Subject	Marine Wildlife and Marine Habitat - Assessment Methods
Reference	<ul style="list-style-type: none"> <li>TSD 24 - Marine Mammal Effects Assessment Sec. 2.4.1 Issues Scoping, 2.4.1.1 Subject of Note Interactions</li> </ul>
Issue/Concern	<p>In the Marine Mammal Effects Assessment (TSD 24, Sec. 2.4.1 Issues Scoping, pp. 16-17), the walrus is scored as a Subject of Note (Level 1 interaction) for disturbance/hearing impairment due to underwater noise from shipping, as is the polar bear. All other marine mammals (ringed seal, beluga, narwhal and bowhead whale) received scores of 2 (i.e., Key Issues). What is different about walrus hearing and potential interactions with shipping to have it scored 1 when other pinnipeds (i.e., ringed seal) are scored 2? The Subject of Note Interactions section (TSD 24, Sec. 2.4.1.1, p. 19) provides a “brief rationale” as to why these interactions were not carried forward in the effects analysis. It is noted that very few walruses are recorded along the Northern Shipping Route, with a single walrus sighted during shore-based monitoring conducted at Bruce Head from 2013 to 2017 and five walrus sightings recorded during aerial surveys conducted from 2013 to 2015 (also note that a walrus was recorded on the DFO photographic survey conducted in 2016, see TSD App. C, Figure 3, p. 6). Walruses are far less abundant than some other marine mammals in the RSA (e.g., narwhal), but they do occur with regularity and there is potential for disturbance, masking, etc. from Project-related shipping. Beluga whales have been assessed for these interactions (as they should be), despite having been observed during Project-specific monitoring at a much lower frequency than walruses. It is not clear why additional assessment of potential interactions for walrus was not undertaken.</p>



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Information Request #82	QIA requests an update on the progress the Proponent and their consultants have made in analyzing and reporting on outstanding marine mammal monitoring activities.
Directed to	Baffinland
Subject	Marine Wildlife and Marine Habitat - Environmental Mitigation and Management; Environmental Monitoring; Residual effects
Reference	<ul style="list-style-type: none"> <li>• Main Document Sec. 8.3.10 Marine Mammals</li> <li>• TSD 24 - Marine Mammal Effects Assessment Appendix A - Marine Mammal Baseline Report, Sec. 4.1.2.1.2 Shore-based Monitoring at Bruce Head (2014-2017) and Sec. 4.1.5 Will marine mammals habituate to frequent and regular ship passages?</li> </ul>
Issue/Concern	<p>The Addendum Main Document (Sec. 8.3.10, p. 8.21) states that “[t]here was no significant change in overall narwhal abundance and distribution observed in the area from 2014-2017”. This statement is highly uncertain given the lack of comprehensive analysis and reporting of some key marine mammal monitoring data. Several important analyses are outstanding, including the 2017 narwhal tagging studies, and the complete (2014-2017) Bruce Head shore-based monitoring data set. The Marine Mammal Baseline Report (TSD 24, App. A, Sec. 4.1.5, p. 92) states that “[r]esults of the 2017 Narwhal Tagging Study will be released in Q4 2018.” At the June 2018 MEWG meeting the target date for providing these results was reported as September 2018 (Q3). We are now at the half-way mark of Q4 and no information has been provided. With regards to the combined Bruce Head analyses, the report states that the amalgamated data set will be analyzed, with results also scheduled for completion in Q4 2018 (TSD 24, App. A, Sec. 4.1.2.1.2, p. 76).</p> <p>What is the current status of these two assessments? How soon will results be provided to the MEWG for review and discussion? Results from the marine mammal monitoring programs are needed to properly assess the potential impacts of Phase 2-related shipping activity. Detailed information on the 2017 narwhal responses to vessel activity has not been available for inclusion in the FEIS assessment, and a full shipping season has passed since then with no opportunity to use this information to support mitigation and adaptive management. Neither the Proponent, nor QIA, is able to assess shipping effects to the extent that should be possible were these analyses available for review and discussion.</p>
Information Request #83	QIA requests information on how acoustic modelling of tugs reflects the actual numbers that may be employed and the noise potential from ice management activities.



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Directed to	Baffinland
Subject	Marine Environment, Marine Water/Ice and Sediment Quality; Marine Wildlife and Marine Habitat - Assessment Methods; Environmental Monitoring
Reference	<ul style="list-style-type: none"> <li>• Main Document s. 4.1.3 Milne Port</li> <li>• TSD 02 - Project Description Sec. 4.11.1 Ore Carriers</li> <li>• TSD 24 - Marine Mammal Effects Assessment Appendix B</li> </ul>
Issue/Concern	The FEIS Addendum (e.g., Main Document Sec. 4.1.3, p. 4.6; TSD 02, Sec. 4.11.1, p. 4.9) indicates that 6-10 tugs/line boats will be required to operate the port, and three will be ice management vessels used for ice management duties during the shoulder seasons. The Acoustic Modelling Report (TSD 24, App. B) includes scenarios whereby ore carriers are assisted by tugs for transit and berthing at Milne Port. However it is not clear how many tugs are modelled in the aggregate scenarios, nor how this compares to the total number that may be in operation at any given time (potentially up to 10). In addition, the modelled scenarios do not appear to have considered ice management activities. How might ice management influence noise output from tugs/line boats in comparison to the model results from open-water berthing and mooring activities?





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Information Request #84	QIA requests information on the variability of noise source levels for different Cape class ore carriers and an assessment of how well the modelled source levels compare with this variation.
Directed to	Baffinland
Subject	Marine Wildlife and Marine Habitat - Assessment Methods
Reference	<ul style="list-style-type: none"> <li>TSD 24 - Marine Mammal Effects Assessment Appendix B - Underwater Noise Modelling Report</li> <li>TSD 02 - Project Description Sec. Sec. 4.2</li> </ul>
Issue/Concern	The underwater noise modelling analysis (TSD 24, App. B) models noise propagation from Post-Panamax and Cape class ore carriers. Data on source levels for transiting Post-Panamax vessels came from 14 bulk carriers ranging in length from 230-245 m and with deadweight tonnage (DWT) ranging from 88,000-119,000 t. Data on Cape class vessels came from seven bulk carriers of 300 m length and 203,000-207,000 DWT (TSD 24 App. B, p. 12). The Addendum TSD 02 (Project Description Sec. 4.2) indicates that Cape class vessels can be up to 230,000 DWT and ca. 316 m in length. This is larger than the modelled Cape class ore carriers. How much can source levels vary among Cape class vessels of different sizes, and how well does the modelled Cape class carrier compare to the maximum potential noise levels?



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Information Request #85	QIA requests additional information on the modelled underwater noise levels from ore carriers.
Directed to	Baffinland
Subject	Marine Wildlife and Marine Habitat - Assessment Methods
Reference	<ul style="list-style-type: none"> <li>TSD 24 - Marine Mammal Effects Assessment Appendix B - Underwater Noise Modelling Report</li> </ul>
Issue/Concern	<p>The underwater noise modelling (TSD 24, App. B) provides important information for the assessment of potential vessel noise-related disturbance to marine mammals. For example, Sec. 4 (p. 27) notes that “[c]arriers transiting outside Milne Port at 9 kn resulted in <math>12.34 \text{ km} &lt; R_{\text{max}} &lt; 29.49 \text{ km}</math> (Cape size carriers) and <math>9.82 \text{ km} &lt; R_{\text{max}} &lt; 19.24 \text{ km}</math> (Post-Panamax carriers) for the 120 dB re 1 <math>\mu\text{Pa}</math> SPL marine mammal disturbance threshold.” These results allow important comparisons to be made on the potential effects of different-sized ore carriers. The map figures in Appendix E (of TSD 24 Appendix B), specifically the SPL isopleth maps (E.1) are similarly valuable. For example, Figure E-7 (Post-Panamax vessel) and Figure E-19 (Cape class vessel) allows one to compare potential differences in noise disturbance to Koluktoo Bay, which is important information for developing mitigation and adaptive management process. Comparisons of Figures E-8 cf. E-20 and E-9 cf. E-21 are similarly valuable as visual comparisons. However, having data on the area covered by these SPL isopleths, and comparisons of the overlap between fields from the two different sized vessels, would provide additional information to assist with reviewing the Phase 2 Proposal and determining appropriate mitigation. QIA is requesting this information for the modelled shipping noise only (i.e., not for dock construction activities).</p>



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Information Request #86	<p>Provide additional details on training delivered to date and planned for Phase 2.</p> <ol style="list-style-type: none"> <li>Breakdown of Mandatory vs On-the-job (advancement) training delivered to Inuit and Non-Inuit in hours by year.</li> <li>New Inuit hires by year, age and educational attainment. This helps understand the number of Inuit who are accepting the opportunity cost of not finishing secondary school.</li> <li>The number of apprenticeships offered to Inuit and Non-Inuit; number of successful vs attempted Trades Entrance Exams; instances of level advancement within an apprenticeship; number of Red Seals earned.</li> <li>Additional Inuit employment hours that Baffinland expects to generate from its current Apprenticeship Program and HEO Training (Q-STEP).</li> <li>Explanation of how Baffinland confirms “Inuit Ethnicity” if not through NTI number. (p 33)</li> <li>How exactly Baffinland will adapt training programs to account for the “small shift in employee level skill requirements” (p 24).</li> <li>Identify the precise training programs that will upgrade employees’ skill levels from D to C to B Positions (p 27). Baffinland rather simply refers to the IHRS (not a training program) and Q-STEP generally. This is a critical question that Baffinland has been asked to consider in the EIS guidelines and it has not done so.</li> <li>Additional details on Inuit promotions, such as lateral vs skill level advancement.</li> <li>Additional details on Inuit departures, including rehires and those ineligible for rehire.</li> <li>Provide career paths for each department that operates in Nunavut, and example career path development plans. This has been a Baffinland commitment for over one year</li> </ol>
Directed to	Baffinland
Subject	Socioeconomic Existing conditions and baseline Assessment Methods
Reference	<ul style="list-style-type: none"> <li>08MN053_TSD-25_Socio-economic-Assessment Volume/Chapter and section: 3-Education and Training</li> </ul>
Details	Additional information is required to allow for an understanding of the extent to which education and training benefits have been delivered to Inuit, and the concrete actions that Baffinland will take to build the semi-skilled and skilled Inuit workforce over the course of Phase 2.



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Information Request #87	<p>Provide additional details on employment opportunities planned for Phase 2.</p> <ul style="list-style-type: none"> <li>A. Additional details on Inuit departures, including rehires and those ineligible for rehire.</li> <li>B. Provide career paths for each department that operates in Nunavut, and example career path development plans. This has been a Baffinland commitment for over one year.</li> <li>C. A list of current and anticipated position titles in all phases by Skill level and educational requirements should be added to Appendix D.</li> <li>D. An analysis or at least discussion about how Baffinland will consider skill equivalencies for Inuit who do not meet education requirements.</li> <li>E. Adjust Figure 4.4 to include Inuit who are 18-24.</li> <li>F. Expand analysis of the labour market to consider movement of Inuit into the labour force over the course of Phase 2.</li> <li>G. Provide a list of positions for which English fluency is not required.</li> </ul>
Directed to	Baffinland
Subject	Socioeconomic Existing conditions and baseline Assessment Methods
Reference	<ul style="list-style-type: none"> <li>• 08MN053_TSD-25_Socio-economic-Assessment Volume/Chapter and section: 4-Employment and Livelihood</li> </ul>
Details	Additional information is required to allow for an understanding of the extent to which Baffinland is committed and prepared to reverse the trend of declining Inuit employment and maximize Inuit participation in Phase 2.

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## QIA INFORMATION REQUESTS TO NUNAVUT IMPACT REVIEW BOARD, PHASE II PROPOSAL

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Information Request #88	How and to what extent did alternative options either positively or negatively (adversely) impact the opportunities available to Inuit and Inuit Firms?
Directed to	Baffinland
Subject	Socioeconomic Alternative Analysis
Reference	<ul style="list-style-type: none"> <li>08MN053_TSD-01_Alternatives-Analysis</li> </ul>
Issue/Concern	There is very little discussion on how the alternatives would positively or negatively impact Inuit benefits such as employment, training and contracting opportunities. Did Baffinland conduct an assessment of Inuit benefits when conducting alternative assessments? Can this information be provided? Such a discussion would improve the dialogue between QIA and Baffinland related to how Baffinland believes the project proposal will benefit Inuit, specifically with respect to changes in the areas of employment, training and procurement.

Information Request #89	Can Baffinland expand upon its engagement efforts with Inuit Firms regarding the opportunities of Phase 2?
Directed to	Baffinland
Subject	Socioeconomic Engagement
Reference	08MN042_mrp2_eis; pdf, pg. 38 08MN053_TSD-03_Phase-2-Community-Workshops-rpt; various
Issue/Concern	Community members noted a lack of opportunity awareness. Engagement and communication is key to allowing Inuit access opportunities and benefits.





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Information Request #93	Can Baffinland predict given their current understanding Inuit Firm capacities the number of Inuit Firms that will be able to compete for the new Phase 2 contracts?
Directed to	Baffinland
Subject	Socioeconomic Effects Assessment
Reference	• 08MN053_TSD-25_Socio-economic-Assessment
Issue/Concern	Baffinland makes numerous statements regarding the value of contracts expenditure with Inuit Firms to date. Given that Baffinland was able to approximate the spend in Canada and Nunavut for Phase 2, why can they not also approximate the Phase 2 spend with Inuit Firms. This could contribute to developing the socioeconomic assessment of the Phase 2 Proposal.

Information Request #94	Can NIRB produce a clear description of their role in monitoring the Mary River Project, specifically, how NIRB oversees the implementation of the current project certificate, how NIRB engages communities in project monitoring, and, a description of NIRBs annual Mary River Project budget and amount of time allocated by NIRB staff.
Directed to	NIRB
Subject	NIRs Role in Monitoring Mary River
Reference	NIRB Project Certificate 005, Amendment No. 2
Issue/Concern	There is a desire to improve the interaction and awareness of party efforts to monitoring the Mary River Project. This desire includes formal working groups, and community interactions on matters of importance related to the project (i.e. marine mammals). NIRB led monitoring efforts intended to oversee the implementation the Project Certificate is highly valued by Inuit. Inuit are also concerned that the scope and style of NIRB monitoring does not presently address the scope of the current project, nor are these efforts adequately addressing Inuit concerns related to impacts, monitoring and mitigation. QIA is seeking additional information which describes the way in which NIRB currently monitors the Mary River Project. Receiving this information will assist QIA in the development of recommendations related to how parties can best align efforts to support improved monitoring or the Mary River Project Certificate, particularly for impacts associated with the Phase II Proposal.



**QIA INFORMATION REQUESTS TO NUNAVUT IMPACT REVIEW BOARD, PHASE II PROPOSAL**

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Information Request #95	<p>To support the ability to review and respond to management plans it is requested that Baffinland supply a document which provides a standalone definition and description of “adaptive management”. Furthermore, QIA requests that Baffinland provide clarity on how IQ collection and application, and community concerns are applied in the context of “adaptive management”. QIA requests four scenarios area examined in the context of describing Baffinland’s approach to adaptive management.</p> <ol style="list-style-type: none"> <li>1. Two consecutive years of limited ability to harvest due to scarcity of marine mammals in traditional harvesting areas during the open water season.</li> <li>2. Perceived impacts to wildlife in the project area (foxes, hare and ptarmigan) from project generated dust.</li> <li>3. Concerns that hunters are unable to safely navigate around project based infrastructure while harvesting caribou.</li> <li>4. Concerns related to the safety of drinking water from traditional water sources.</li> </ol>
Directed to	Baffinland
Subject	Adaptive Management
Reference	NIRB Project Certificate 005, Amendment No. 2
Issue/Concern	<p>The Phase II Proposal is littered with references to “adaptive management”. This term is used to imply that future actions of the company may be taken to better address impacts if and when warranted. What is not clear to QIA is how Baffinland makes decisions regarding adaptive management. In other words, how does Baffinland manage adaptive management? QIA notes this topic is not limited to the Phase II Proposal but is also informed by QIA’s experience in engaging in existing project management activities. QIA does not believe Baffinland has a stable, consistent or communicable or well understood approach to “adaptive management”. Furthermore, QIA does not believe there is clarity as how and when Inuit experiences with the project and IQ are used to guide/inform/contribute to adaptive management decisions. QIA is requesting that Baffinland provide a standalone description of what adaptive management means and how adaptive management decisions are made in the context of the Mary River Project. Specifically, how it relates to the development, management and revisions to Management Plans. QIA believes this is an important topic of discussion for which improved clarity is required prior to the submission of technical review comments.</p>