



Environment and Climate Change Canada Environnement et Changement climatique Canada

Environmental Protection Operations
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January 4, 2016

EC file: 6100 000 011 /004

NWB file: 2AM-MRY1325

Manager of Licensing
Nunavut Water Board
P.O. Box 119
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Nunavut, X0B 1J0

Via email to licensing@nwb-oen.ca

RE: 2AM-MRY1325 - Baffinland – Mary River Project – Interim Closure and Reclamation Plan

Environment and Climate Change Canada (ECCC) has reviewed the above-mentioned plan submitted to the Nunavut Water Board by Baffinland Iron Mines Corporation. ECCC's specialist advice is provided based on our mandate, in the context of the *Canadian Environmental Protection Act*, and the pollution prevention provisions of the *Fisheries Act*.

COMMENT # ECCC-1

Reference:

Table 6-1 (p. 71) – Borrow Pits and Quarries (Railway)

Comment:

The "Associated Monitoring Programs" listed in Table 6 for "Railway - Borrow Pits and Quarries" are incorrect. The current list includes geotechnical/engineering monitoring; flora and fauna monitoring; and environmental site assessment but the correct associated monitoring program is aquatic monitoring.

Recommendation:

The monitoring program associated with Railway Borrow Pits and Quarries should be corrected to read 'Aquatic Monitoring'.

COMMENT # ECCC-2

Reference:

Sections 5.1.1.7; 5.1.1.8; 9.7 and Table 6.1

Comment:

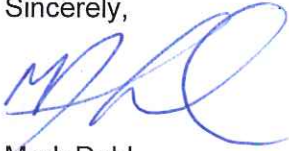
In the comments submitted to the NWB and NIRB on June 2015 ECCC requested that the proponent define the phrase "unacceptable environmental risk". The term "unacceptable environmental risk" is used in various places throughout the plan and although the proponent has indicated that this a commonly used term it is still unclear what would determine if a risk was "unacceptable" and who would make that determination.

Recommendation:

Baffinland should clarify what will be used to determine if a risk is acceptable and who will make the determination.

If further information is required please do not hesitate to contact the undersigned at (204) 983-4815 or via email at mark.dahl@canada.ca.

Sincerely,



Mark Dahl
Environmental Assessment Coordinator
Prairie and Northern Region

cc: Wade Romanko, Head, Environmental Assessment North (NT and NU).
Susan Tiege, A/Manager, Environmental Assessment and Marine Programs, PNR.
EC Review Team