

	Eqe Bay - -Spill Contingency Plan	Issue Date: March 20 <u>June 5</u> , 2026	Page 1 of 26
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Baffinland Iron Mines Corporation

EQE BAY

SPILL CONTINGENCY PLAN

BAF-PH1-400-P16-0002

Issued for PermittingReview

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Title: Senior Director, Exploration and Strategic Planning
Date: ~~March 20~~ June 5, 2026
Signature:

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Department: Sustainable Development
Title: Senior Director, Sustainable Development
Date: June 5 ~~March 20~~, 2026
Signature:

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DOCUMENT REVISION RECORD

Issue Date MM/DD/YY	Revision	Prepared By	Approved By	Description of Change and Purpose of Issue
12/07/18	DRAFT	AV	TI	DRAFT – Issued for Permitting
02/22/19	0	RAC	MLH	Final – Issued for Permitting
07/24/2020	1	LH	JH	Added map with spill kit location
03/20/2026	2	JH	LK	DRAFT – Issued for Review
<u>06/05/2026</u>	<u>3</u>	<u>JH</u>	<u>LK</u>	<u>Final – Issued for Permitting;</u> <u>Updates made based on regulator</u> <u>comments</u>

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Foreword

Additional copies of this Plan may be obtained from:

Baffinland Iron Mines Corporation

~~2275 Upper Middle Road East~~ 360 Oakville Place Drive, Suite 300

Oakville Ontario L6H ~~0C3GK8~~

Tel: (416) 364-8820 ~~Fax: (416) 364-0193~~

For the distribution list of this Plan, see Table A.

Table A - Distribution List for the Ege Bay Spill Contingency Plan

<p>Government of Nunavut Department of Environment – Environmental Protection Division PO Box 1000 Station 200 <u>1320</u> Iqaluit, Nunavut XOA OH0 Tel : (867) 975-7700 (877) 212-6638, (867) 975-6000 Fax : (867) 975-7742 (867) 975-6099</p>	<p>Department of Fisheries and Oceans Central and Arctic Region 630 Queen Elizabeth Way <u>520 Exmouth Street</u> Sarnia, Ontario <u>Iqaluit, Nunavut</u> XOA 3H0N7T 8B1 Tel : (867) 979-8000 (519) 383-1813, 1-866-290-3731 Fax : (867) 979-8039 (519) 464-5128</p>
<p>Qikiqtani Inuit Association 200-922 Sivumugiaq St <u>Igluvut Building, 2nd Floor</u> PO Box 1340 Iqaluit, Nunavut XOA OH0 Tel : (867) 975-8400, 1-800-667-2742 Fax : (867) 979-3238</p>	<p>Crown-Indigenous Relations and Northern Affairs Canada – Field Operations Division Qimugjuk Building <u>969 Federal Road</u> PO Box 2200 Iqaluit, NU XOA OH0 Tel: (867) 975-4295 (Director, Lands and Field Operations: Erik Allai <u>Manager, Field Operations: Jeremy Fraser</u>) Fax: (867) 979-6445</p>
<p>Crown-Indigenous Relations and Northern Affairs Canada - Waters Resources Division Building 918 969 Federal Road PO Box 1002 <u>2200</u> Iqaluit, NU XOA OH0 Tel: (867) 222-9278 <u>975-4550</u> (Manager, Water Resources: Ian Parsons <u>Andrew Keim</u>) Fax: (867) 975-4585 <u>4560</u></p>	<p>Nunavut Water Board PO Box 119 Gjoa Haven, Nunavut XOB 1J0 Tel : (867) 360-6338 Fax : (867) 360-6369</p>
<p>Nunavut Impact Review Board 29 Mitik Street PO Box 1360 Cambridge Bay, Nunavut XOB OCO Tel : 1-866-233-3033 Fax : (867) 983-2594, (867) 983-2574</p>	

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This revision of the Plan has been prepared to accompany the application for a Type 'B' Water Licence for the Ege Bay Exploration Program. A future update to this Plan will address the following:

- Update the distribution list in Table A.
- Add spill kit locations to the site layout figure in Appendix B.
- Update the list of response equipment in Appendix C.
- Confirm that the MSDS list in Appendix D is complete.

The updated Plan will be sent to the distribution list in Table A.

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1 INTRODUCTION

1.1 PURPOSE AND SCOPE

The purpose of this Plan is to identify the potential for an accidental release (spill) of a hazardous material to the environment (land, ice, or freshwater) during the Eqe Bay Exploration Program (Exploration Program). This Plan outlines credible spill scenarios that could occur and identifies the protocols that will be implemented to prevent and respond to spills, including the recovery of spilled material.

Baffinland is seeking a Type ‘B’ Water Licence from the Nunavut Water Board (NWB) for the Exploration Program. It is expected that this Plan will require approval by the NWB under a future Type ‘B’ Water Licence. This Plan is a living document and will be updated as required.

1.2 APPROACH TO SPILL RESPONSE

A spill is defined as the unauthorized discharge or release of a hazardous product out of its containment and into the environment. Potential hazards to humans, vegetation, water resources, fish and wildlife vary in severity, depending on several factors including nature of the material, quantity spilled, location and season. Due to their quantities and frequency of use, Diesel and Jet Fuels (Artic Diesel/P50 and Jet A) are the main products at risk for being spilled during the Exploration Program and therefore spill response procedures focus primarily on these hazardous materials. Other chemicals that may be spilled include sewage, anti-freeze, and small quantities of lubricants and oils.

All Exploration Program Personnel shall be trained on the procedures to be followed to report a spill and initiate spill response. The first person to notice a spill shall take the following steps:

1. Immediately warn other personnel working near the spill area.
2. Evacuate the area if the health and safety of personnel is threatened.
3. In the absence of danger, and before the spill response team arrives at the scene, take any safe and reasonable measure to stop, contain and identify the nature of the spill.
4. Notify the Supervisor, who will initiate the spill response operations.

All spill response interventions carried out follow these general procedures:

Source Control – If safe to do so, reduce or stop the flow of product. This could involve simple actions such as turning off a pump, closing a valve, or sealing a puncture hole with something nearby (e.g., a rag, piece of wood, tape), raising a leaky or discharging hose to a level higher than the product level inside the tank, or transferring fuel from leaking containers.

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Control of Free Product – If safe to do so, prevent or minimize the spread of the spilled product. Accumulate/concentrate spilled product in an area to facilitate recovery. Barriers positioned down-gradient of the spill will slow or stop the progression of the spill. Barriers can consist of absorbent booms, dykes, berms, or trenches (dug in the ground or in ice).

Protection – Evaluate the risk of the impacted area to the surrounding environment. Protect sensitive ecosystems and natural resources at risk by isolating the area and/or diverting the spill material away from sensitive receptors. Protection may be achieved by the effective use of various types of barriers.

Clean up the Spill – Recover and containerize as much free product as possible. Recover and containerize/treat contaminated soil, water, and snow/ice.

Report the Spill – Provide basic information such as date and time of the spill, type and amount of product discharged, photographic records, location and approximate size of the spill, actions already taken to stop and contain the spill, meteorological conditions and any perceived threat to human health or the environment. Reporting requirements for spills is detailed in Section 7 of this Plan.

1.3 RELATIONSHIP TO OTHER MANAGEMENT PLANS

The following management plans have been developed specifically for the Eqe Bay Exploration Program and incorporate key mitigation and management strategies used at Baffinland’s Mary River Project:

As such, this Plan must be viewed in context with the following plans:

- Eqe Bay – Environmental Protection Plan
- Eqe Bay – Environmental Inspection and Monitoring Plan
- Eqe Bay – Closure and Reclamation Plan
- Eqe Bay – Waste Management Plan

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2 BAFFINLAND POLICIES

2.1 HEALTH, SAFETY AND ENVIRONMENT POLICY

This Baffinland Iron Mines Corporation Policy on Health, Safety and Environment is a statement of our commitment to achieving a safe, healthy and environmentally responsible workplace. We will not compromise this policy for the achievement of any other organizational goals.

We implement this Policy through the following commitments:

- Continual improvement of safety, occupational health and environmental performance.
- Meeting or exceeding the requirements of regulations and company policies.
- Integrating sustainable development principles into our decision-making processes.
- Maintaining an effective Health, Safety and Environmental Management System.
- Sharing and adopting improved technologies and best practices to prevent injuries, occupational illnesses and environmental impacts.
- Engaging stakeholders through open and transparent communication.
- Efficiently using resources, and practicing responsible minimization, reuse, recycling and disposal of waste.
- Reclamation of lands to a condition acceptable to stakeholders.

Our commitment to provide the leadership and action necessary to accomplish this policy is exemplified by the following principles:

- As evidenced by our motto “Safety First, Always” and our actions, Health and Safety of personnel and protection of the environment are values, not priorities.
- All injuries, occupational illnesses and environmental impacts can be prevented.
- Employee involvement and active contribution through courageous leadership is essential for preventing injuries, occupational illnesses and environmental impacts.
- Working in a manner that is healthy, safe and environmentally sound is a condition of employment.
- All operating exposures can be safeguarded.
- Training employees to work in a manner that is healthy, safe and environmentally sound is essential.
- Prevention of personal injuries, occupational illnesses and environmental impacts is good business.
- Respect for the communities in which we operate is the basis for productive relationships.

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We have a responsibility to provide a safe workplace and utilize systems of work to meet this goal. All employees must be clear in understanding the personal responsibilities and accountabilities in relation to the tasks we undertake.

The health and safety of all people working at our operation and responsible management of the environment are core values to Baffinland. In ensuring our overall profitability and business success every Baffinland and business partner employee working at our work sites is required to adhere to this Policy.

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- ~~● Employee involvement and active contribution through courageous leadership is essential for preventing injuries, occupational illnesses and environmental impacts.~~
- ~~● Working in a manner that is healthy, safe and environmentally sound is a condition of employment.~~
- ~~● All operating exposures can be safeguarded.~~
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- ~~● Prevention of personal injuries, occupational illnesses and environmental impacts is good business.~~
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~~Brian Penney~~

~~Chief Executive Officer~~

~~April 2018~~

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2.2 BAFFINLAND SUSTAINABLE DEVELOPMENT POLICY

PURPOSE

Baffinland Iron Mines LP (Baffinland or the Company) conducts its business in accordance with the principles of our Sustainable Development Policy (“Policy”), which is underpinned by the Universal Declaration of Human Rights, United Nations (UN) Sustainable Development Goals, and Canada’s commitments to the Paris Agreement.

The sustainability of our operations is strengthened by our commitment and responsibility to protect the environment, to operate safely, in a fiscally responsible manner and with utmost respect for the cultural values, Inuit Qaujimagajatuqangitig (IQ) and legal rights of Inuit.

SCOPE

We expect each and every employee, contractor, and visitor to value, honour and commit to this Policy through their actions.

The six pillars of our Sustainable Development Policy are:

- 1) Health and Safety
- 2) Environment
- 3) People, Rights Holders and Cultural Integrity
- 4) Supply Management and Economic Development
- 5) Climate Action
- 6) Transparent Governance

OUR PILLARS

HEALTH AND SAFETY

Our motto is “Safety First, Always” We consider people as our greatest assets and Health and Safety of our workforce and affected communities is a foundational value. This value is further bolstered by our Health, Safety and Environment Policy.

We strive to achieve the safest workplace for our people and remain free from occupational injuries and illnesses.

We lead with a culture of collective responsibility and promote courageous leadership through active participation, responsible behaviour, and risk awareness.

ENVIRONMENT

We integrate western science and IQ knowledge through community engagements and consultations, environmental and socio-economic working groups and monitoring programs to assess project related effects, minimize impacts and preserve marine, terrestrial and freshwater life, conserve biodiversity and support community well-being.

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We continuously seek to undertake initiatives to use energy, raw materials and natural resources more efficiently, and implement technologies to enhance our environmental conservation practices and reduce our footprint.

We evolve our Interim Closure and Reclamation Plan to meet reclamation objectives effectively through all stages of project operations and development.

PEOPLE, RIGHTS HOLDERS AND CULTURAL INTEGRITY

We uphold human rights and dignity of all individuals with utmost respect, guided by UN Guiding Principles on Business and Human Rights and acting in accordance to Nunavut Land Claims Agreement.

We strive to build strong and lasting relationships with the affected Inuit communities. We honour and respect the unique values and traditions of Inuit and work in partnership to incorporate IQ across our business practises, and our Mission, Vision and Values were developed to directly align with Inuit Societal Values.

We are committed to the well-being of affected communities and aim to create positive and lasting impact. We actively engage, develop and provide support systems dedicated to physical, mental and emotional well-being, as well as foster inclusion and preservation of cultural practices.

We do not tolerate discrimination or harassment of any form against individuals, including employees and contractors on the basis of race, colour, sexual orientation, gender identity, religion, political opinion, nationality or social origin and are committed to advance equity, diversity and inclusion of historically under-represented groups within our workforce and culture.

We expect our employees and contractors, community members, and workers in our value chain to bring human rights concerns to our attention through our established channels. We are committed to engaging with our communities of interest on our human rights impacts and to report and improve on our performance.

SUPPLY MANAGEMENT AND ECONOMIC DEVELOPMENT

We are focused on advancing social, cultural and economic development of our communities of interests.

We work with affected Inuit communities to develop socio-economic self-reliance through our support for local enterprises, skills development programs and job creation initiatives contributing to long term success and well-being of the community.

We are committed to building resilient and transparent supply chains to uphold responsible business practices that enhances our economic impact on our communities and lowers business risks.

We expect our suppliers to conform to our Code of Business Conduct and uphold internationally recognised human rights standards. While we operate in Canada, we actively engage with our value chain to minimize the risk of any violations.

CLIMATE ACTION

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As a Canadian critical mineral producer of high grade iron ore, we contribute to the manufacturing of low carbon steel in support of global net zero transition.

We are committed to adopt viable technologies for improving energy efficiency, reducing greenhouse gas emissions, reducing our carbon footprint and adapt to climate change.

We work to ensure that our operations support the needs and vision of future generations of Nunavummiut.

TRANSPARENT GOVERNANCE

We implement steps within our operations to understand, evaluate and manage risks on a continuing basis, including those that may impact the environment, employees, contractors, local communities, consumers and shareholders.

We endeavour to ensure that adequate resources are available and that systems are in place to implement risk-based management systems, including defined standards and objectives for continuous improvement.

We monitor, review and report our performance with respect to our safety, health, environmental, socio-economic commitments and set annual targets and objectives.

We are dedicated to effectively and efficiently utilizing our shareholder’s capital while demonstrating honesty and integrity by applying the highest standards of ethical conduct. Our Code of Business Conduct reinforces our commitment to uphold and exceed legal and regulatory requirements in all aspects of our business practices.

We are committed to transparency in our operations, underscored by robust monitoring programs and disclosure practices. Our monitoring programs lead the body of research for this region of the Arctic and are evaluated by technical working groups comprised of government bodies, regulators and local authorities.

FURTHER INFORMATION

Please refer to the following policies and documents for more information on Baffinland’s commitment to operating in an environmentally and socially responsible manner:

Health, Safety and Environment Policy

Equity, Diversity and Inclusion in the Workplace Policy

Code of Business Conduct

~~At Baffinland Iron Mines Corporation (Baffinland), we are committed to conducting all aspects of our business in accordance with the principles of sustainable development & corporate responsibility and always with the needs of future generations in mind. Baffinland conducts its business in accordance with~~

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~~the Universal Declaration of Human Rights and ArcelorMittal's Human Rights Policy which applies to all employees and affiliates globally.~~

~~Everything we do is underpinned by our responsibility to protect the environment, to operate safely and fiscally responsibly and with utmost respect for the cultural values and legal rights of Inuit. We expect each and every employee, contractor, and visitor to demonstrate courageous leadership in personally committing to this policy through their actions. The Sustainable Development and Human Rights Policy is communicated to the public, all employees and contractors and it will be reviewed and revised as necessary on a regular basis. These four pillars form the foundation of our corporate responsibility strategy:~~

- ~~1. Health and Safety~~
- ~~2. Environment~~
- ~~3. Upholding Human Rights of Stakeholders~~
- ~~4. Transparent Governance~~

~~1.0 HEALTH AND SAFETY~~

- ~~● We strive to achieve the safest workplace for our employees and contractors; free from occupational injury and illness, where everyone goes home safe everyday of their working life. Why? Because our people are our greatest asset. Nothing is as important as their health and safety. Our motto is "Safety First, Always".~~
- ~~● We report, manage and learn from injuries, illnesses and high potential incidents to foster a workplace culture focused on safety and the prevention of incidents.~~
- ~~● We foster and maintain a positive culture of shared responsibility based on participation, behaviour, awareness and promoting active courageous leadership. We allow our employees and contractors the right to stop any work if and when they see something that is not safe.~~

~~2.0 ENVIRONMENT~~

- ~~● Baffinland employs a balance of the best scientific and traditional Inuit knowledge to safeguard the environment.~~
- ~~● Baffinland applies the principles of pollution prevention, waste reduction and continuous improvement to minimize ecosystem impacts, and facilitate biodiversity conservation.~~
- ~~● We continuously seek to use energy, raw materials and natural resources more efficiently and effectively. We strive to develop more sustainable practices.~~
- ~~● Baffinland ensures that an effective closure strategy is in place at all stages of project development to ensure reclamation objectives are met.~~

~~3.0 UPHOLDING HUMAN RIGHTS OF STAKEHOLDERS~~

- ~~● We respect human rights, the dignity of others and the diversity in our workforce. Baffinland honours and respects the unique cultural values and traditions of Inuit.~~

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- ~~• Baffinland does not tolerate discrimination against individuals on the basis of race, colour, gender, religion, political opinion, nationality or social origin, or harassment of individuals freely employed.~~
- ~~• Baffinland contributes to the social, cultural and economic development of sustainable communities in the North Baffin Region.~~
- ~~• We honour our commitments by being sensitive to local needs and priorities through engagement with local communities, governments, employees and the public. We work in active partnership to create a shared understanding of relevant social, economic and environmental issues, and take their views into consideration when making decisions.~~
- ~~• We expect our employees and contractors, as well as community members, to bring human rights concerns to our attention through our external grievance mechanism and internal human resources channels. Baffinland is committed to engaging with our communities of interest on our human rights impacts and to reporting on our performance.~~

4.0 TRANSPARENT GOVERNANCE

- ~~• Baffinland will take steps to understand, evaluate and manage risks on a continuing basis, including those that may impact the environment, employees, contractors, local communities, customers and shareholders.~~
- ~~• Baffinland endeavours to ensure that adequate resources are available and that systems are in place to implement risk-based management systems, including defined standards and objectives for continuous improvement.~~
- ~~• We measure and review performance with respect to our safety, health, environmental, socio-economic commitments and set annual targets and objectives.~~
- ~~• Baffinland conducts all activities in compliance with the highest applicable legal & regulatory requirements and internal standards.~~
- ~~• We strive to employ our shareholder's capital effectively and efficiently and demonstrate honesty and integrity by applying the highest standards of ethical conduct.~~

4.1 FURTHER INFORMATION

Please refer to the following policies and documents for more information on Baffinland's commitment to operating in an environmentally and socially responsible manner:

[Health, Safety and Environment Policy](#)
[Workplace Conduct Policy](#)
[Inuktitut in the Workplace Policy](#)
[Site Access Policy](#)
[Hunting and Fishing \(Harvesting\) Policy](#)
[Annual Report to Nunavut Impact Review Board](#)

If you have questions about Baffinland's commitment to upholding human rights, please direct them to contact@baffinland.com.

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Brian Penney
Chief Executive Officer
March 2016

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3 LEVELS OF SPILL RESPONSE EMERGENCY

To effectively manage emergency response, Baffinland has adopted a tiered emergency classification scheme. Each level of emergency, based on the significance of the event, requires varying degrees of response, effector and support. The impact on operations will also differ as will the requirements for investigation and reporting. The emergency spill response classifications are defined by the following three (3) levels.

Level 1 (Low) – Minor accidental release of deleterious substance with:

- No threat to public safety; and/or
- Negligible environmental impact to receiving environment.

Level 2 (Medium) – Major accidental release of deleterious substance with:

- Some threat to public safety; and/or
- Moderate environmental impact to receiving environment.

Level 3 (High) – Uncontrolled hazard which:

- Jeopardizes personnel safety; and/or
- Significant environmental impact to receiving environment.

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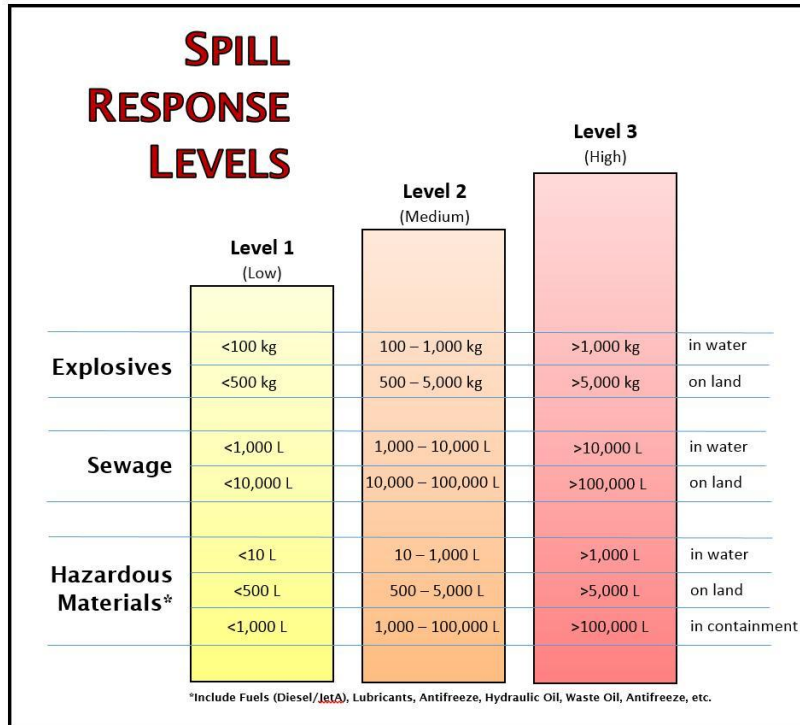


FIGURE 3-1 SPILL RESPONSE LEVELS

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4 SPILL RESPONSE PROCEDURES

The locations of spill response equipment are shown on the site layout in Appendix B. The list of available response equipment contained in each spill kit is presented in Appendix C.

4.1 SPILLS ON LAND

Response to spills on land will include the general procedures detailed Section 1.2 of this Plan.

The main spill control techniques involve the use of two types of physical barriers: dykes and trenches. Barriers should be placed down gradient (down-slope) from the source of the spill, and as close as possible to the source of the spill. Barriers slow the progression of the spill and also serve as containment to allow recovery of the spilled material.

Depending on the volume spilled, the site of the spill as well as available material, a dyke may be built with soil, booms, lumber, snow, etc. A plastic liner should be placed at the foot of and over the dykes to protect the underlying soil or other material and to facilitate recovery of the spill. Construct dykes in such a way as to accumulate a thick layer of free product in a single area (V shaped or U-shaped).

Trenches are useful in the presence of permeable soil and when the spilled fuel is migrating below the ground surface. A plastic liner should be placed on the down-gradient edge of the trench to protect the underlying soil. Liners should not be placed at the bottom of the trench to allow water to continue flowing underneath the layer of floating oil (if applicable).

The use of large quantities of absorbent materials to recover large volumes of spilled fluids should be avoided. Large volumes of free-product should be recovered and containerized, as much as possible, by using vacuums and pumps appropriate to the material. Mixtures of water and fuel may be processed through an oil-water separator. Absorbent sheets should be used to soak up residual fuel on water, on the ground (soil and rock), and on vegetation. Peat moss may also be sprinkled on vegetation to absorb films of petroleum products.

Contaminated spill response materials and product will be handled on site as a hazardous material and will be temporarily stored in secondary containment on site until transfer offsite for proper disposal and/or treatment.

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4.2 SPILLS ON FRESHWATER

Responses to spills on fresh water include the general procedures previously detailed. Various containment, diversion and recovery techniques are discussed in the following sections. The following elements must be considered when conducting response operations:

- Type of water body or water course (lake, stream, river).
- Water depth and surface area.
- Wind speed and direction.
- Type of shoreline; and
- Seasonal considerations (open-water, freeze-up, break-up, frozen).

Containment of a fuel slick requires the deployment of mobile floating booms to intercept, control, contain and concentrate (i.e., increase thickness) the floating oil. For a large lake, typically, one end of the boom is anchored to shore while the other is towed by a boat and used to circle the diesel fuel slick and return it close to shore for recovery using a skimmer. Reducing the surface area of the slick increases its thickness and thereby improves recovery. Mechanical recovery equipment (i.e., skimmers and oil/water separators) will be mobilized to site if required.

If fuel is spilled in a smaller water body such as a small lake or pond, it may not be possible to deploy booms using a boat. In this case, measures will be undertaken to protect sensitive and accessible shoreline (spills resulting from traffic incidents). The fuel slick will be monitored to determine the direction of migration. In the absence of strong winds, the oil will likely flow towards the discharge of the lake. Measures are taken to block and concentrate the oil slick at the lake discharge using booms where it will subsequently be recovered using a portable skimmer, a vacuum, or sorbent materials.

In small slowly-flowing rivers, streams, channels, inlets or ditches, inverted weirs (i.e., siphon dams) are used to stop and concentrate moving diesel fuel for collection while allowing water to continue to flow unimpeded. In the case of floating fuel in a stream heading for a culvert (i.e., at a road crossing), a culvert block is used to stop and concentrate moving fuel for collection while allowing water to continue to flow unimpeded. In both cases fuel will then be recovered using a portable skimmer or sorbent materials.

In the case of spills in larger rivers, with fast moving currents, diversion booming is used to direct the oil slick ashore for recovery. Single or multiple booms (i.e., cascading) may be used for diversion. Typically, the booms are anchored across the river at an angle. The angle will depend on the current velocity. Choosing a section of a river that is both wide and shallow makes boom deployment easier. Diversion booming may also be used to direct an oil slick away from a sensitive area to be protected.

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4.3 SPILLS ON SNOW AND ICE

In general, snow and ice will slow the movement of hydrocarbons. The presence of snow may also hide the fuel slick and make it more difficult to follow its progression. Snow is generally a good natural sorbent, as hydrocarbons have a tendency to be soaked up by snow through capillary action.

However, the use of snow as absorbent material is to be limited as reasonably practical. Snow and frozen ground also prevent hydrocarbons from migrating down into soil or at least slow the migration process. Ice prevents seepage of fuel into the underlying water body.

Response to spills on snow and ice includes the general procedures previously detailed. Most response procedures for spills on land may be used for spills on snow and ice. The use of dykes (i.e., compacted snow berms lined with plastic sheeting) or trenches (dug in ice) slow the progression of the fuel and also serve as containment to allow recovery of the fuel.

Free-product is recovered by using a vacuum, a pump, or sorbent materials. Contaminated snow and ice is scraped up manually or using heavy equipment depending on volumes. The contaminated snow and ice is placed in containers or within lined berms on land. The contaminated water and product will be treated on site, utilizing available treatment systems, or transferred offsite for proper disposal and/or treatment. Free phase product that is recovered will be utilized as a source of fuel on site, if possible.

4.4 WILDLIFE PROTECTION PROCEDURES

In response to a spill event, techniques used to prevent wildlife from becoming oiled or contaminated, by preventing animals from entering the contaminated area, will consist of hazing and other deterrents. This will be accomplished using a combination of both audible and visual devices, which could include:

- Pyrotechnics, i.e. shell crackers, screamers, propane cannons for shore based spills.
- Visual scare tactics, i.e.: helicopters, emergency response vessels or other water vessels.
- Broadcast sounds, i.e. Breco Bird Scarer designed to float with an oil spill.
- Exclusion, i.e. netting applied in smaller contaminated areas such as settling or evaporation ponds.

To minimize environmental impact, these devices are most effective when initiated immediately.

The size of the spill and location in relation to sensitive wildlife areas must be assessed at the time of the event as to correctly apply the appropriate level of deterrence. Only personnel trained in the safe and proper use of certain hazing equipment will be permitted to haze wildlife. Personal Protective Equipment will be worn by all personnel using equipment, as per manufactures instructions. At a minimum, this will include the use of eye and ear protection. Other personnel in the vicinity of such devices should also use

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ear protection or remain at a safe distance away. Hazing through the use of pyrotechnics should not be used too close to dry vegetation or flammable spill materials due to associated fire hazards.

Hazing should be administered in such a way as to prevent wildlife from being hazed into an area where they may become endangered. It is also important to ensure that hazing efforts do not cause already contaminated animals to leave the area before they are able to receive treatment. Techniques should be applied as soon as possible to prevent wildlife from interacting with spilled product or contaminated areas.

All emergency response vessels shall be equipped with deterrent devices to ensure timely response in case of a spill occurrence off-shore. To prevent habituation, variation of hazing techniques will be used such as changing the location, appearance and types of hazing or using a combination of hazing techniques.

Efforts shall be made to collect alive or dead oiled wildlife. In the event of a spill occurring in or around a water body, shorelines and beaches shall be inspected for contaminated wildlife to be collected. Emergency response vessels shall be equipped with dip-nets, large plastic collecting bags for dead wildlife, and cardboard boxes or cloth bags for live oiled wildlife. To ensure that live oiled wildlife are dealt with humanely, capture and handling of wildlife shall only be done by trained personnel. Gloves shall be worn when handling contaminated wildlife (leather gloves for raptors and mammals, latex/rubber gloves for ducks and small shorebirds). Wildlife will be kept individually within cloth bags or ventilated cardboard boxes. Bags and cardboard boxes containing wildlife will be labeled with the date and time the animal was found, name of finder, location and name of species, if known. Wildlife treatment facilities will then be contacted for advisement on treatment. All contaminated wildlife will be held in a warm quiet place until treatment. The Canadian Wildlife Service (CWS) will be consulted to determine the most humane treatment strategy to be implemented for live oiled wildlife, whether rehabilitation or euthanization.

For wildlife mortalities each carcass shall be bagged and labelled individually. The date and time the animal was found, name of finder, location and name of species, if known, shall be documented. CWS shall be consulted and approval obtained prior to disposing of any dead wildlife. Contact information for experts in bird hazing and bird exclusion, oiled bird rehabilitation, and permits required to haze, salvage, hold and clean, and/or euthanize birds, are outlined in Table 3-1.

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TABLE 4-1 EMERGENCY CONTACTS IN CASE OF SPILLS AFFECTING WILDLIFE

Name	Location	Phone Number/Contact Information	Purpose
Canadian Wildlife Services (CWS)	<u>P.O. Box 1870 Suite 301-933 Mivvik St. Iqaluit NU X0A 0H0 Qimugjuk Building, Iqaluit</u>	<u>cwsnorth-scf nord@ec.gc.ca</u> <u>1-867-975-4636</u> <u>1-867-979-7279</u>	<p>Knowing and providing information on the migratory bird resource and species at risk (under CWS jurisdiction) in the area of a spill (this includes damage assessment and restoration planning after the event)</p> <p>Minimizing the damage to birds by deterring oiled birds from becoming oiled</p> <p>Ensuring the humane treatment of captured migratory birds and species at risk by determining the appropriate response and treatment strategies which may include euthanization or cleaning and rehabilitation.</p>
Cobequid Wildlife Rehabilitation Centre	Brookfield, NS	1-902-893-0253	Provide veterinary care and rehabilitation for wildlife
Nunavut Emergency Management	P.O. Box 1000, Station 700 Iqaluit, NU X0A 0H0	1-800-693-1666	Nunavut Emergency Management is responsible for developing the territorial emergency response plans, coordinating general emergency operations at the territorial and regional levels, and supporting community emergency response operations.
International Bird Rescue	International	1-888-447-7143	Wildlife rehabilitation specialists, can manage all aspects of wildlife response

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5 DISPOSAL OF SPILLED PRODUCT AND CONTAMINATED MATERIAL

Quatrex bags, overpack drums, or other appropriate containers will be used to contain, transport and store contaminated soil, snow and/or water. Contaminated material will be treated as hazardous waste, stored in secondary containment and transported offsite to a licensed facility for treatment and disposal if the material cannot be processed on site. Used sorbent material will be burned in the incinerator as per incinerator standard operating procedures. Contaminated snow from sewage releases will be contained in supplementary tankage for treatment during the summer months.

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6 POTENTIAL SPILL ANALYSIS

To prepare for emergency spill response, potential spill analysis was conducted on various worst-case scenarios. The exercise serves to identify potential risk areas, as well as to determine the fate of spilled products and their environmental effects. This section examines spill scenarios as they relate to the types of activities associated with the Eqe Bay Exploration Program.

Several types of materials have been identified as capable of causing environmental, health, and safety concerns should a spill occur while being transported, used, stored and/or handled. These include: fuel, untreated sewage and effluent, lubricants and oils. These materials are planned to be utilized daily during the exploration activities warranting the evaluation of potential spill scenarios. All other hazardous materials, chemicals or wastes will be managed in smaller quantities that limit the magnitude of the spills that could occur.

6.1 FUEL SPILLS

The planned fuel volumes to be stored at site to support the Exploration Program are presented below in Table 5-1.

TABLE 6-1 PLANNED FUEL INVENTORY

Camp Size	Description of Fuel	Fuel Type	Maximum Fuel Volume (L)
50-person	1,800 Drums	Diesel / Jet- A	369,000
100-person	60-24,000 L ISO Containers	Diesel / Jet- A	1,440,000

Stored fuel at site will be required to have secondary containment that meets the requirements of CCME’s *Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products (2003)*.

In all cases, Baffinland shall prevent any chemicals, petroleum products or wastes associated with the Exploration Program from entering nearby waterbodies. All sumps and fuel caches shall be located at a distance of at least thirty-one (31) metres from the ordinary high water mark of any adjacent water body and inspected on a regular basis. The above basis is consistent with the document *Design Rationale for Fuel Storage and Distribution Facilities (2006)*, published by the Department of Public Works of the Northwest Territories.

All fuel storage areas will be equipped with spill kits for emergency response. Spill kit locations will be presented on a figure in Appendix B in a future update to this Plan following the establishment of the exploration camp. Each spill kit will contains the appropriate type, size and quantity of equipment for the volume/type of product present at the storage location, and will reflect the environment likely to be affected by a spill (i.e., ground, river, lake, and ocean). A list of spill response supplies is presented in Appendix C.

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6.1.1 POTENTIAL FUEL SPILL SCENARIO 1: DROPPED FUEL DRUM WHILE SLINGING

Fuel required for exploration activities will need to be transported to the exploration area using a helicopter and sling, primarily during the initial exploration phase prior to the development of an access road. It is possible that a spill may occur during the transfer of these drums which would most likely be the result of equipment failure or operator error. Maintenance schedules will be implemented to reduce the risk of equipment malfunctions and proper training procedures will be implemented to mitigate the risk of operator error.

Description of Incident	Spill from dropping fuel drum while slinging
Potential Causes	Operator error. Equipment Malfunction such as sling failure.
Product Spilled	Fuel
Maximum Volume Spilled	205 Litres
Estimated Time to Spill Entire Volume	5 to 25 minutes
Immediate Receiving Medium	Land, water, ice
Most Probable Direction of Spill Migration	Depends on the location.
Distance and Direction to Closest Body of Water	Depends on the location.
Resources to Protect	Nearby water bodies.
Emergency Response Level	Level 2 (medium)
Estimated Emergency Spill Response Time	5 to 15 minutes

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Spill Response Procedures	<p>If a spill occurs during slinging, all transfer activities will be halted immediately and clean up of the spill with the available spill kit will commence. The Environmental Representative will be contacted and the spill will be reported.</p>
	<p>a) In the event the spill occurs on land, the spill will be contained through the use of temporary berms and ditches until it can be collected and stored. Contaminated material (snow, water, etc.) will be removed and stored in a containment area until it can be shipped offsite for treatment and/or disposal. Used sorbent material generated will be incinerated.</p>
	<p>b) In the event the spill occurs on water, booms and other spill control devices will be deployed downstream and spilled product will be collected and removed from the water body. Recovered and contaminated material will be stored in a dedicated containment area until it can be shipped offsite for treatment and/or disposal. Used sorbent material will be incinerated.</p>
	<p>c) In the event the spill occurs on ice/snow, the use of dykes (i.e., compacted snow berms lined with plastic sheeting) or trenches (dug in ice) will be employed to slow the progression of the fuel and serve as temporary containment. Free product will be recovered by using a vacuum, a pump, or sorbent materials. Contaminated snow and ice will be scraped up manually or using heavy equipment depending on volumes. The contaminated snow and ice will be placed in containers or within lined berms on land. The contaminated water and product will be shipped offsite for treatment and/or disposal. Used sorbent material will be incinerated.</p>

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6.1.2 POTENTIAL FUEL SPILL SCENARIO 2: SEAL BROKEN ON ENGINE FUEL FILTER

It is possible for a spill to occur if there is a broken seal on the engine fuel filter (i.e., generator) or equivalent as a result of equipment malfunction. The following mitigation measures will be implemented to reduce potential impacts:

- Maintenance schedules and regular inspections by operators will be implemented to reduce the risk of equipment malfunctions and ensure equipment is functioning as designed.
- Place spill mats / drip pans / drip trays under vehicles when they are parked or idle for a period of two hours or more.
- Park vehicles and place stationary equipment at least 31 m from the normal high-water mark of any water body.

Description of Incident	Seal broken on engine fuel filter.
Potential Causes	Equipment malfunction. Operator error.
Product Spilled	Diesel Fuel
Maximum Volume Spilled	Up to 80 Litres
Estimated Time to Spill Entire Volume	5 to 15 minutes
Immediate Receiving Medium	Depends on the location.
Most Probable Direction of Spill Migration	Depends on the location.
Distance and Direction to Closest Body of Water	Depends on the location.
Resources to Protect	Nearby water bodies
Emergency Response Level	Level 2 (medium)
Estimated Emergency Spill Response Time	15 to 60 minutes
Spill Response Procedures	The spill will be contained through the use of temporary berms and ditches and spill kit supplies until it can be collected and stored. Spilled product and contaminated material (soil, water, etc.) will be removed and stored in a containment area until it can be shipped offsite for treatment and/or disposal. Used sorbent material generated will be incinerated.

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6.1.3 POTENTIAL FUEL SPILL SCENARIO 3: OVERFILL OF FUEL TANK

Fuel spills can occur during refuelling activities involving mobile and stationary equipment. The following mitigation measures will be implemented to reduce potential impacts:

- Only personnel trained in proper refuelling methods will be permitted to refuel equipment at site.
- Refuelling activities will only occur at least 31 metres away from the ordinary high water mark of nearby water bodies whenever possible.
- Refuelling activities will be halted if a leak is detected; mobile secondary containment (i.e. drip trays) will be utilized during fuel transfers to mitigate the release of fuel to the environment via leaks and drips.
- Stationary equipment (i.e. generators, heaters) will be equipped with secondary containment, whenever possible. In the event that a spill does occur, spill kits will be employed to stop, contain and recover the spill and associated contaminated material.
- Use fuel nozzles equipped with automatic shutoffs.
- Station operators at both ends of hoses during refueling operations, unless both ends of the hose are visible and readily accessible by one operator.
- Provide adequate lighting at refueling areas (enabling fuel levels to be adequately judged, and any overflow to be observed).

Description of Incident	Overfill during refuelling activities.
Potential Causes	Operator error. Equipment failure.
Product Spilled	Diesel fuel
Maximum Volume Spilled	10-20 L
Estimated Time to Spill Entire Volume	5 minutes
Immediate Receiving Medium	Depending on the location. All refuelling activities will occur at least 31 metres away from the ordinary high water mark of nearby water bodies whenever possible.
Most Probable Direction of Spill Migration	Depends on the location.
Distance and Direction to Closest Body of Water	Depends on the location. All refuelling activities will occur at least 31 metres away from the ordinary high water mark of nearby water bodies whenever possible.
Resources to Protect	Any nearby water bodies.
Emergency Response Level	Level 2 (medium).
Estimated Emergency Spill Response Time	10 minutes
Spill Response Procedures	In the event that there is a spill during refuelling activities, refuelling activities will be halted by shutting off the fuel pump and spill response measures will be employed to stop and contain the spill. Once the spill has been contained, spilled product and contaminated material (soil, water, etc.) will be removed and stored in a containment

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	area until it can be shipped offsite for treatment and/or disposal. Used sorbent material generated will be incinerated.
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6.1.4 POTENTIAL FUEL SPILL SCENARIO 4: SPILL DURING FUEL TRANSFER FROM SEALIFT BARGE

Fuel spills can occur during fuel resupply activities. Initially, this will involve delivery of drums on pallets, which will be offloaded using a zoom boom. Eventually, bulk fuel storage may be used at Eqe Bay, consisting of up to sixty-three (63) 24,000 L capacity double-walled ISO containers (1.5 million litres total). A fuel spill during transfer from sealift barge would be a Level 3 of high emergency.

Response measures for a spill during fuel transfer are much more involved. Prior to undertaking the use of bulk fuel storage at Eqe Bay, this plan or a separate response plan dealing with this specific scenario will be developed and submitted to the NWB for review and approval.

6.2 UNTREATED SEWAGE

The Eqe Bay Exploration Program will utilize a biological sewage treatment plant. Treated sewage effluent will be discharged to land to run off into Eqe Bay. The discharge of untreated or partially treated sewage, that does not meet effluent discharge criteria, is possible due to equipment malfunction or system upset.

Given the proposed camp layout and local topography, releases of untreated or partially treated sewage would most likely runoff over land and report to Eqe Bay. In the event of a spill, impacted snow and ice would be recovered and placed in a temporary berm containment area for eventual treatment during the summer months.

Grey water generated may be directed to a sump and not to the sewage treatment facility. Any greywater sump will be constructed at least 31 m above the ordinary high water mark of any water body, at a site where direct flow into a water body is not possible and no additional impacts are created, unless otherwise approved by the Board in writing.

6.3 LUBRICANTS, OILS AND GLYCOL

Lubricants, oils and glycol will be used on site during operations however the risks of spills on site is expected to be minimal due to the relatively small quantities at which they will be used at site. All lubricants, oils and glycol will be handled by trained personnel and will be stored in secondary containment when not being used. Spill kits will be readily available and will be deployed in the event of a spill. Biodegradable hydraulic oils will be used (when appropriate) for equipment that is working near or in water.

6.3.1 POTENTIAL LUBRICANTS, OILS AND GLYCOL SPILL SCENARIO 1: CONTAINMENT PUNCTURE

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The most likely spill scenario to occur with regards to lubricants, oils and glycol is a puncture of an individual container during transport. Lubricants and oils will be stored in 20 L pails or 1 cubic metre (m³) totes. The likelihood of a puncture occurring is minimal as all equipment operators will be trained in proper lubricant and oil transfer procedures. In most scenarios involving a puncture, operators will see the puncture immediately and will be able to take the appropriate actions to respond to and contain the spill.

Description of Incident	Container is punctured during transport.
Potential Causes	Operator error. Equipment failure
Product Spilled	Lubricant or oil.
Maximum Volume Spilled	1,000 L
Estimated Time to Spill Entire Volume	5 minutes
Immediate Receiving Medium	Land
Most Probable Direction of Spill Migration	Depends on the location.
Distance and Direction to Closest Body of Water	Depends on the location.
Resources to Protect	Any nearby water bodies.
Emergency Response Level	Level 1 (low) or 2 (medium).
Estimated Emergency Spill Response Time	>5 minutes
Spill Response Procedures	If the equipment operator is not injured, he/she will act as a first responder and immediately initiate the spill contingency plan utilizing the spill kit kept in the vicinity. The spill will be contained through the use of temporary berms and ditches and spill response supplies. Once the spill has been contained, spilled product and contaminated material (soil, water, etc.) will be removed and stored in a containment area until it can be shipped offsite for treatment and/or disposal. Used sorbent material generated will be incinerated.

6.3.2 POTENTIAL LUBRICANTS, OILS AND GLYCOL SPILL SCENARIO 2: SPILLS DURING TRANSFER

It is possible that a minor spill may occur during the transfer of lubricants, oils and glycol to stationary or mobile equipment. This will most likely be the result of equipment failure such as the pump or hoses or operator error. To mitigate risks associated with transfer activities, transfer activities will only occur at least 31 metres away from the ordinary high water mark of nearby water bodies whenever possible. Transfer activities will be halted if a leak is detected; mobile secondary containment (i.e. drip trays) will be utilized during transfers to mitigate the release of product to the environment via leaks and drips. Stationary equipment (i.e. generators, heaters) will be equipped with secondary containment, whenever possible. In the event that a spill does occur, spill kits will be employed to stop, contain and recover the spill and associated contaminated material.

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Description of Incident	Spill during transfer.
Potential Causes	Operator error. Equipment failure.
Product Spilled	Lubricant or oil.
Maximum Volume Spilled	10-20 L
Estimated Time to Spill Entire Volume	5 minutes
Immediate Receiving Medium	Depending on the location. All transfer activities will occur at least 31 metres away from the ordinary high water mark of nearby water bodies whenever possible.
Most Probable Direction of Spill Migration	Depends on the location.
Distance and Direction to Closest Body of Water	Depends on the location. All transfer activities will occur at least 31 metres away from the ordinary high water mark of nearby water bodies whenever possible.
Resources to Protect	Any nearby water bodies.
Emergency Response Level	Level 1 (medium).
Estimated Emergency Spill Response Time	10 minutes
Spill Response Procedures	In the event that there is a spill during transfer activities, transfer activities will be halted by stopping the flow of product and spill response measures will be employed to stop and contain the spill. Once the spill has been contained, spilled product and contaminated material (soil, water, etc.) will be removed and stored in a containment area until it can be shipped offsite for treatment and/or disposal. Used sorbent material generated will be incinerated.

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7 REPORTING REQUIREMENTS

Spills that meet or exceed the reporting threshold for hazardous materials as outlined in the Nunavut Spill Contingency Planning and Reporting Regulations will be reported to the Northwest Territories and Nunavut Spill Line (NT-NU Spill Line). All external reporting requirements shall be conducted by Baffinland’s Environmental Representative.

Spills that are below the reporting thresholds under the Nunavut Spill Contingency Planning and Reporting Regulations will be documented internally. Internal spill reports will be written by the department responsible for the spill, and will be submitted through Baffinland’s Incident Reporting System.

At a minimum, spill reports will contain the following information: Name of the owner/operator of the system; the estimated date of spill or leak; the type and quantity of product(s) released; the suspected immediate cause of the spill and corrective actions implemented.

Table 8-1 provides guidance pertaining to spill reporting and associated clean-up procedures for site personnel. Departments responsible for the spill are required to complete clean-up activities using the resources required.

TABLE 7-1: GENERAL SPILL REPORTING AND CLEAN-UP REQUIREMENTS

Spill on Land		
Volume (L)	Required Documentation	Spill Clean up
Less than 1 litre	- Verbal or email report	Environmental Representative will advise if needed.
Greater than 1 litre and less than 100 litres	- Photos of spill and clean-up - Baffinland Incident Investigation Report	Spills greater than 30 litres will have an Environmental Representative present to advise clean-up efforts.
Greater than 100 litres	- Photos of spill and clean-up - Baffinland Incident Investigation Report - NT-NU Spill Report - Notification to regulators and the Spill Line	The Environmental Representative will lead and advise clean-up efforts.
Spill on Water Body or Watercourse		
Volume (L)	Required Documentation	Spill Clean up
Any volume	- Photos of spill and clean-up - Baffinland Incident Investigation Report - NT-NU Spill Report - Notification to regulators and the Spill Line	The Environmental Representative will lead and advise clean-up efforts.

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Appendix A

NT-NU Spill Report Form

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NT-NU SPILL REPORT
OIL, GASOLINE, CHEMICALS AND
OTHER HAZARDOUS MATERIALS



Canada

NT-NU 24-HOUR
SPILL REPORT LINE
Tel: (867) 920-8130
Email: spills@gov.nt.ca



Form sections A through M containing fields for Report Date, Occurrence Date, Land Use Permit Number, Geographic Place Name, Latitude/Longitude, Responsible Party, Product Spilled, Spill Source, and Summary of incident.

REPORT LINE USE ONLY section containing fields N through M for spill line contact information, lead agency, and support agencies.

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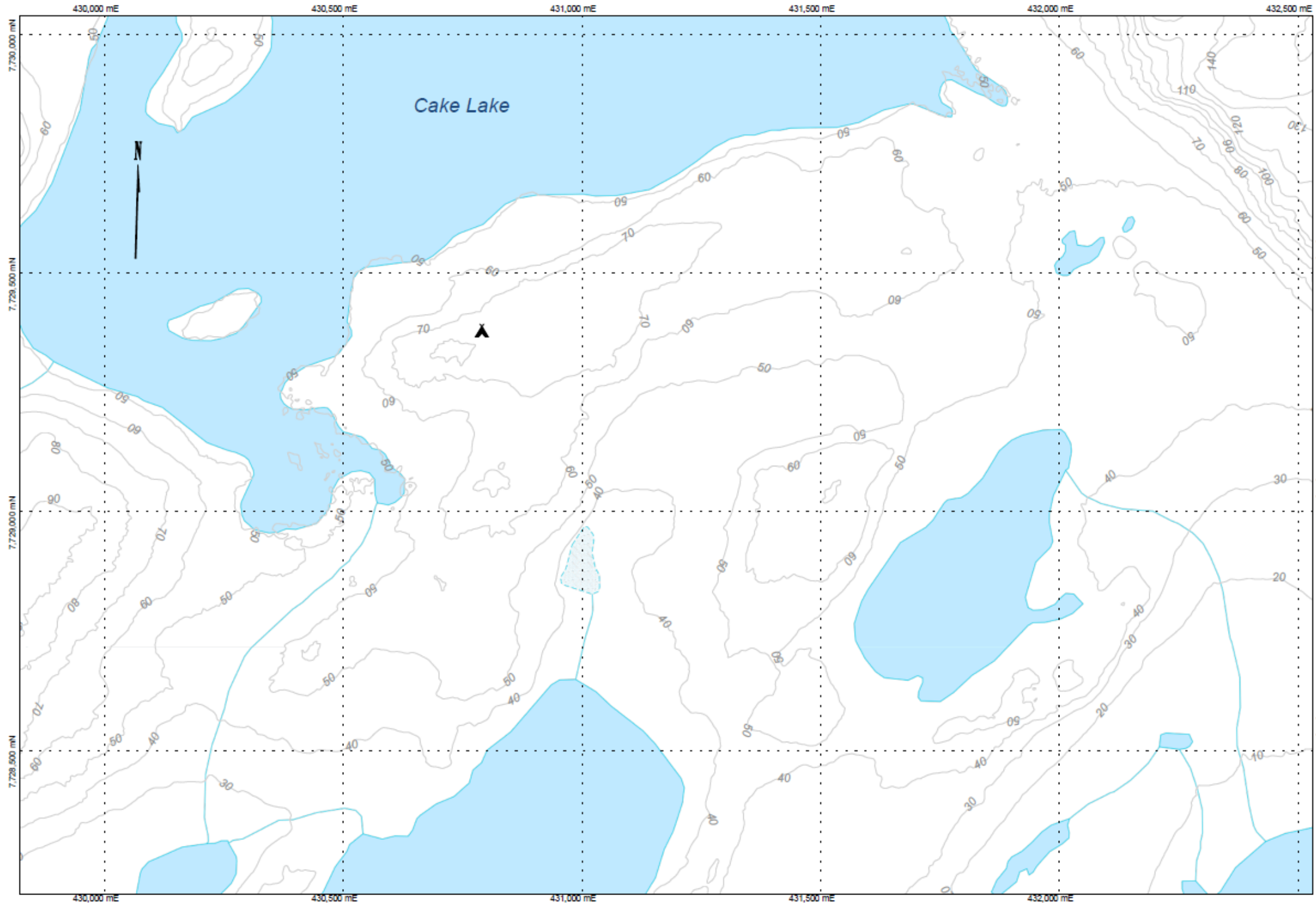
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Appendix B



Eqe Bay Exploration Site Layout – Spill Kit Locations



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Legend

- 
 Tent, Fuel & Spill Kit Location
 E: 430790
 N: 7729380
 UTM NAD83 18W
- 
 Contour (10 m)

	
Survival Tent, Fuel Cache & Spill Kit Location	
<small>Date:</small> 2025-03-05	<small>Scale:</small> 1:18000
<small>Office:</small> Exploration	<small>Project:</small> UTM Zone 18 NAD 83
	

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Appendix C

Spill Response Supplies

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C.1 TYPICAL SPILL RESPONSE KITS AT BAFFINLAND’S EXPLORATION PROJECTS

Kit No./Details	Contents	Quantity
<p align="center">SPILL CHEST</p> <p>Absorbs up to 170 Gallons Heavy duty plastic Yellow Container Can be moved with a forklift or skidsteer</p>	Sorbent Pads (19" x 17" x 3/8") Sorbent Socks (3" x 4ft) Sorbent Booms (5" x 10ft) Sorbent Pillows (15" x 9ft) Sorbent Roll (38" x 144ft) Nitrile Gloves (pair) Disposal Bag Epoxy Putty Barricade Tape (roll)	100 8 4 16 1 2 4 1 1
<p align="center">HEAVY DUTY DRUM KIT</p> <p>Absorbs up to 75 Gallons Heavy duty plastic Yellow Container Drum sizes include 65 & 94 US gallons or an economy 45 gallon steel drum</p>	Sorbent Pads (19" x 17" x 3/8") Sorbent Booms (5" x 10ft) Xsorb (6 quart) Nitrile Gloves (pair) Disposal Bag Disposable Coveralls Drain Cover Splash resistant goggles	100 4 1 2 4 2 1 2

NOTE: This appendix will be updated once spill response kits have been purchased.

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Appendix D

Material-Safety Data Sheets

• Diesel Fuel
• Gasoline
• Jet A Fuel
• Engine Oil
• Hydraulic Oil
• Ethylene Glycol
• Propylene Glycol

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