

Comment No.	Assessment of Proponent Response	Additional Comments/Recommendations for Baffinland (NWB Process)
QIA-NWB-1	Satisfactory	
QIA-NWB-2	Partially satisfactory	Baffinland responded that peak camp occupancy could occur during any or all seasons, but is initially expected during the summer. They cannot forecast beyond that, and did not understand why this information was relevant. Expected seasonal occupancy of the exploration camp is required to understand impacts to fish, wildlife, and land use, all of which vary depending on the time of the year. For instance, we may expect greater impacts where camp occupancy is at a peak that overlaps a time period where caribou migrate through the area. Baffinland also responded that pipe specifications and routing details are not currently available, as this information will depend on the final siting of the facilities. However, they stated that it is unlikely that piping will cause meaningful disturbance to the ground surface as it will likely be placed by hand or possibly using a small skid steer.
QIA-NWB-3	Satisfactory	
QIA-NWB-4	Partially satisfactory	Baffinland responded that backpack drills are incredibly small and that no reclamation is needed for these drill holes. However, even these small drill holes should be cut and capped. We recommend that backpack drill holes be expressly included in the Drill Hole Abandonment section of the EPP (2.5.2, p. 26), where the first point states, "Upon completion of a hole in rock, the casing will be removed. If the casing cannot be removed it will be cut off to be flush with surface and backfilled."
QIA-NWB-5	Satisfactory	
QIA-NWB-6	Satisfactory	
QIA-NWB-7	Partially satisfactory	In their written response and during the Feb 21, 2019 conference call, Baffinland indicated that they will prepare a simple Emergency Response Plan for Ege Bay. Although this was unlikely to be ready for the NWB deadline, please define "in the near future" with a date for completion of the ERP. Baffinland also responded that key elements of a Polar Bear Safety Plan are included in the EPP (Sections 2.10, 3.6, Appendix A). The QIA reviewed the Mary River plan found online (Mar 2016 revisions) to compare the adequacy of the Ege Bay EPP. Additional measures should be included in the Polar Bear OES: - Additional targeted training, refresher classes for bear monitors and qualified hazing personnel, safety meetings and memos, posters and other signage, etc. - Site design considerations (e.g., sight distances, lighting, minimizing hiding/ambush locations).

		- Food or refuse will not be left in parked equipment or vehicles. - Clear snow around buildings and fences, and avoid creating large berms that could conceal polar bears. - Observations of beached carcasses will be reported immediately to the Environmental Representative, who will contact appropriate agencies. - Regular inspection of polar bear-resistant storage containers and, if applicable, access controls (doors, cameras). This could also be added to Table 3-2 of the Environmental Inspection and Monitoring Plan, which currently describes weekly checks that bear monitors and/or electric fence is in place. Can Baffinland confirm whether electric fences will be used at Ege Bay? - Guidelines to follow for helicopter hazing. Appendix D in the Mary River plan emphasizes that helicopter pilots will review the Polar Bear Hazing Protocol prior to actively participating in hazing. All mitigation applied for wildlife encounters (including hazing) should be documented.
QIA-NWB-8	Partially satisfactory	Responsibilities of the Environmental Representative have been updated to include review and revision of the EPP, which is appreciated. However, the wording of Baffinland's response regarding QIA consultation could be modified to indicate or guarantee <u>meaningful</u> consulted, which requires sufficient time for meaningful review, and to show the QIA how they have incorporated or considered their comments into future revisions of the EPP and other management plans.
QIA-NWB-9	Satisfactory	
QIA-NWB-10	Partially satisfactory	The EPP Section 2.4 (Water Use) has been updated for a minimum 30 days' notification. But Section 2.5 (Exploration Drilling), p. 24, still refers to 15 days – please update. Furthermore, the QIA also recommends collecting information on fish presence, where possible, during exploration, as some fish use is seasonal/temporary and may not be captured in the 30 day period, depending on when the need for additional water arises.
QIA-NWB-11	Satisfactory	Aside from the 15-day notification period mentioned in the comment above (QIA-NWB-10), Baffinland has reinstated water management measures into Section 2.5 of the EPP.
QIA-NWB-12	Satisfactory	
QIA-NWB-13	Partially satisfactory	While it is preferable that Baffinland will not dispose of CaCl powder in sumps, the disposal of CaCl-containing drill water could also be a problem if CaCl is present at high concentrations. Although Baffinland indicated in their response to QIA-NWB-11 that drilling is expected to be sufficiently shallow, such that CaCl brine is not expected to be needed, appropriate environmental protection measures should still be planned. Baffinland did not address the QIA's comment about inspecting sumps for longevity and sump failure; however, Baffinland has included a new measure in Section 2.5 of the EPP (see further comments below in QIA-NWB-28).

QIA-NWB-14	Satisfactory	
QIA-NWB-15	Satisfactory	
QIA-NWB-16	Partially satisfactory	Baffinland has reinstated the 12-hour spill reporting requirement into the EPP. However, despite Baffinland's written response, the QIA has not been included in any spill reporting procedures in the EPP, Spill Contingency Plan, or Waste Management Plan.
QIA-NWB-17	Partially satisfactory	Baffinland's response describes the Ege Bay staff and supervisor training requirements regarding the EPP and emergency spill response. Training information has not been added to the EPP, but the QIA expects that these details will be included in the pending Emergency Response Plan.
QIA-NWB-18	Partially satisfactory	Baffinland has added reporting leaks to the Environmental Representative to appropriate sections of the EPP except for Section 2.5.2 (Exploration Drilling), p. 25 – please update.
QIA-NWB-19	Satisfactory	
QIA-NWB-20	Satisfactory	
QIA-NWB-21	Partially satisfactory	Baffinland has added a measure in Section 2.5.2 of the EPP that food should not be allowed outside of kitchen areas (aside from bagged lunches), which is appreciated. However, regarding incineration of food waste, the EPP edits state, "Efforts will be made to incinerate food waste on a daily basis or semi-daily basis as much as possible." This does not adequately address the QIA's recommendation and is not different from Baffinland's original plan to incinerate food waste "each or every other day" as stated in the Waste Management Plan. Baffinland "will consider" appropriate kitchen controls to minimize attractants.
QIA-NWB-22	Partially satisfactory	Baffinland has updated the Waste Management Plan to preferentially incinerate cardboard, paper, and untreated wood (except when large quantities are generated at once). Please also add a statement about preferential incineration in the EPP, Section 2.14.3. Baffinland also responded that the only discrepancy in Table 3-1 of the Incineration SOP is the disposal of biomedical waste, which they have removed in the updated Waste MP. However, there are still discrepancies regarding plastics and whether or not they will be incinerated. Table 3-1 states that (non-domestic packaging), including plastic containers and plastic film, can be incinerated. However, Section 4.2 of the Waste MP (Non-Hazardous Construction Waste), p. 20, states that polyethylene film and other construction plastics (e.g., packaging) will be recycled, reused, or shipped offsite for disposal. Please clarify Baffinland's policies and update the appropriate section(s) of the Waste MP, as needed, regarding disposal of plastics.
QIA-NWB-23	Unsatisfactory	In response to QIA-NWB-23, Baffinland simply refers to their responses for QIA-NWB-22. However, the QIA presented different comments and recommendations than responded to in the response to QIA-NWB-23. Baffinland did not commit to following the Government of Nunavut guidelines for burning and incineration of solid waste (e.g., using modified burn barrels for open burning),

		nor proper recording and reporting of burned materials. We had requested that Baffinland record the quantities and types of materials burned, and to provide an annual report to the QIA.
QIA-NWB-24	Partially satisfactory	Baffinland has stated that the treated sewage effluent discharge location will be governed by the Water License and the discretion of the Waters Inspector. Baffinland did not address the QIA's request to consult with them about the location. Baffinland also stated that the area was used by Inuit historically but is rarely used today due to distance from nearest communities. They do not expect "meaningful populations of clams" given the deep waters, so did not address our comment about protocols to monitor clam safety.
QIA-NWB-25	Satisfactory	
QIA-NWB-26	Partially satisfactory	In their written response, Baffinland agreed to inspect drip trays regularly and clean up antifreeze immediately to prevent ingestion by wildlife, but did not make any edits to the management plans. The QIA requests that this protective measure be added to the EPP (Section 2.16.2) and Waste MP (Section 4.4), especially since Baffinland is planning on using both propylene glycol- and ethylene glycol-based antifreeze. The latter type is much more toxic to humans and wildlife.
QIA-NWB-27	Satisfactory	
QIA-NWB-28	Partially satisfactory	While Baffinland did not address sump capacity in their written response, they did reinstate the measure about ensuring sufficient sump capacity into Section 2.5.2 of the EPP. An additional measure has also been included in this section: "Daily checks of active sumps will be conducted to ensure that any sump water spill-over occurs in a controlled manner. Sumps are to be constructed so that there is an overflow notch cut into the sump embankment to allow the sump water to decant from the sump in a controlled fashion."
QIA-NWB-29	Satisfactory	
QIA-NWB-30	Partially satisfactory	Baffinland has updated the Waste MP to include incinerating toilets in Section 8, Table 3-1, and Table 3-2. Note that there is a cross-referencing error on p. 29 – Section 4.8 discusses incinerator ash, not Section 5.3. The QIA notes that Pacto toilets are not self-incinerating toilets; waste is gathered in bags and staff will need to dispose of the bags into the regular incinerator. Therefore, additional details need to be included in Section 8, such as how frequently Pacto waste will be collected for disposal. Ideally, collection and incineration should occur daily, as the QIA previously requested. Daily incineration would reduce the potential for attracting wildlife to food waste, human waste, and other putrescible products. Furthermore, Baffinland did not address the QIA's comment about storing human waste in animal-proof containers. Table 3-2 in the Waste MP still specifies "closed drums in the hazardous waste storage areas". According to Section 7.2, there is no

		criterion for hazardous waste storage to be in a secured, animal-proof area. However, Section 6.3 of the Mary River Polar Bear Safety Plan (to which the Ege Bay EPP refers) states that hazardous materials shall be stored to prevent polar bear access. In addition, Section 6.5 of this Polar Bear Safety Plan states that there have been instances of property damage and injury associated with improperly handled sewage waste. The QIA requests that a commitment to store human wastes in a manner that prevents polar bear access.
QIA-NWB-31	Partially satisfactory	Baffinland's response only focuses on explosives, which they have added to Table 3-2 and Appendix A of the Waste MP. In their response to QIA-NWB-7, Baffinland believes that it has adequately addressed hazardous materials and waste in the Waste MP, without the need for a separate Hazardous Material and Hazardous Waste Management Plan. While the QIA agrees that a separate hazardous materials/waste plan is likely unnecessary for the Ege Bay project, the Waste MP would benefit from additional details to ensure worker safety. For example, more information should be provided about employee training and awareness of hazardous materials and MSDS, appropriate PPE, storage of incompatible materials, storage of explosive and flammable materials away from heat, etc.
QIA-NWB-32	Partially satisfactory	Baffinland has made some edits to Appendix A of the Waste MP, but additional discrepancies/ambiguities remain: - Table 3-2 is specific about whether open or closed top drums should be used for storage of various waste types. If the use of open vs closed top drums is important for worker safety, please clarify all of the ambiguous "drums" in Appendix A. - Appendix A indicates that contaminated soils should be placed in white Quatrex bags. Please update Table 3-2, which only indicates storage in contained area until final disposal. - Table 3-2 indicates that "Fluorescent Lamps – bulbs and tubes" will be processed using an onsite bulb eater prior to being stored in sealed drums/barrels for offsite disposal. Please clarify Appendix A to indicate crushed lightbulbs and filters.
QIA-NWB-33	Partially satisfactory	Baffinland clarified that waste/used oil may be burned in the camp incinerator but that it is more likely to be disposed off-site due to impurities exceeding the thresholds in the GN's <i>Environmental Guideline for Used Oil and Waste Fuel</i> (2012). A copy of these limits are now included as Table 5-2 in the Ege Bay Waste MP. However, there are no plans in the Waste MP to regularly monitor or test for impurities in waste/used oil; it is only mentioned as an as-needed action if an Inspector requires accredited laboratory analysis as part of incinerator inspections. If Baffinland is proposing incineration of waste/used oil as an acceptable option for disposal, the levels of impurities must be analyzed beforehand.
QIA-NWB-34	Partially satisfactory	Baffinland responded that water sampling at Ege Bay will take components of the Mary River Water Sampling QA/QC plan, and sampling programs will be expanded if initial exploration proves promising. However, Baffinland did not respond to the QIA's comments about additional water quality sampling that may be needed prior to starting the Ege Bay exploration program.
QIA-NWB-35	Satisfactory	

QIA-NWB-36	Partially satisfactory (adequate)	Baffinland has added Figure 4-1 to the Environmental Inspection and Monitoring Plan, showing 6 locations for water quality monitoring. Baffinland did not directly provide the rationale for their site selection, as the QIA had requested. However, the map is useful as it shows the proposed intake and discharge sites, and the locations for monitoring runoff from quarries are downslope.
QIA-NWB-37	Partially satisfactory	Baffinland responded that groundwater is unlikely to be encountered, but the NWB and QIA will be notified if it does occur. Please include the QIA in the reporting procedures in the EPP, for the measure in Section 2.5 (Exploration Drilling) about artesian flow occurrence.
QIA-NWB-38	Satisfactory	
QIA-NWB-39	Satisfactory	
QIA-NWB-40	Partially satisfactory	The QIA appreciates Baffinland's clarification regarding the inspection frequency requirements of the CCME. However, since the CCME recommends daily visual inspections of fuel storage, Table 3-1 in the Environmental Inspection and Monitoring Plan should be updated from weekly to daily, for consistency and clarity.
QIA-NWB-41	Partially satisfactory	Baffinland has updated the Spill Contingency Plan to identify a Level 3 scenario (bulk fuel spill during ship-to-shore transfer; Section 6.1.4). Baffinland's written response and plan updates indicate that prior to undertaking the use of bulk fuel storage at Ege Bay, a more fulsome spill response plan for this specific scenario will be developed and submitted to the NWB for review and approval. This plan should also be submitted to the QIA for review and approval.
QIA-NWB-42	Satisfactory	QIA and Baffinland will have standalone discussions regarding Security estimates and the Abandonment and Reclamation Plan
QIA-NWB-43	Satisfactory	QIA and Baffinland will have standalone discussions regarding Security estimates and the Abandonment and Reclamation Plan
QIA-NWB-44	Satisfactory	QIA and Baffinland will have standalone discussions regarding Security estimates and the Abandonment and Reclamation Plan
QIA-NWB-45	Satisfactory	QIA and Baffinland will have standalone discussions regarding Security estimates and the Abandonment and Reclamation Plan
QIA-NWB-46	Satisfactory	QIA and Baffinland will have standalone discussions regarding Security estimates and the Abandonment and Reclamation Plan
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QIA-NWB-50	Satisfactory	QIA and Baffinland will have standalone discussions regarding Security estimates and the Abandonment and Reclamation Plan
QIA-NWB-51	Satisfactory	QIA and Baffinland will have standalone discussions regarding Security estimates and the Abandonment and Reclamation Plan
New comment 1 (Based on new edits and updates to previously submitted documents)		In the tracked changes version of the Feb 2019 EPP, Section 2.11.2, reporting of fox and wolf interactions in annual reports has been removed. Out of all the Ege Bay management plans being reviewed by the QIA, only water quality monitoring and waste monitoring results are explicitly included in annual reports (Environmental Inspection and Monitoring Plan). The QIA would like Baffinland to describe additional content that will be included in their annual reports to the NWB, NIRB, QIA, and other intervenors.
New comment 2 (Based on new edits and updates to previously submitted documents)		In the tracked changes version of the Feb 2019 EPP, Section 2.12.2, Baffinland has added two vague points about caribou protection measures: - “Monitoring and mitigation measures will be implemented at points where the roads, trails and flight paths pass through caribou calving areas, particularly during caribou calving times.” - “Protocols will be implemented for documentation and reporting of all caribou interactions as well as mechanisms for adaptive management responses designed to prevent further interactions.” Further details are needed about Baffinland’s plans and protocols for monitoring, mitigation, and adaptive management for caribou, in order for the QIA to conduct a meaningful review of the EPP.
New comment 3 (Based on new edits and updates to previously submitted documents)		In the tracked changes version of the Feb 2019 EPP, Section 2.20.2, Baffinland has added a new protection measure for quarry and borrow management: “In the event water licence criteria or other criteria established in the quarry management plans are exceeded or close to being exceeded, personnel will work with Environment to develop and implement effective preventative and/or mitigation measures, including treatment, if necessary, to ensure that the effects associated with the manufacturing, storage, transportation and use of explosives do not negatively impact the Project and surrounding areas.” Baseline data (e.g., soil and water sampling) within the zone of influence of each quarry site need to be collected to assess the full impacts of any explosives exceedances. Baseline information will also allow Baffinland to evaluate the effectiveness of any mitigation/treatment measures, where the goal should be to restore the land to its pre-disturbed state. Can Baffinland please confirm whether baseline data collection will be performed at borrow source and quarry sites?

New comment 4 (Based on new edits and updates to previously submitted documents)		Space for a 5-pp Incident Investigation Form has been added to Section 3.14 of the EPP; however, the form itself has not been included. As this form is meant for “all non-approved land disturbances” (Section 2.3.2) and spills, the QIA would like to review the contents of this form.
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