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September 21st, 2018

Honorable Minister LeBlanc Minister of Intergovernmental Affairs, Northern Affairs and Internal Trade House of Commons Ottawa, Ontario, Canada K1A 0A6

Re: Nunavut Impact Review Board, 2018 Production Increase Application (August 31, 2018).

Dear Honorable Minister LeBlanc,

This correspondence is intended to provide a joint community response to the "Nunavut Impact Review Board's Reconsideration Report and Recommendations, Production Increase Proposal, Baffinland Iron Mines Corporation (August 31st, 2018)" (the "NIRB Recommendation"). This letter conveys our position that the 2018 Production Increase Application, and its associated impacts, monitoring programs and mitigation measures, are reasonable particularly when considered in light of the QIA / BIM "Project Stabilization Approach" (more on this below). The signatories of this letter met numerous times in Pond Inlet regarding the 2018 Production Increase Application. We feel this letter accurately reflects our shared understanding. We would like to share our concerns regarding the NIRB Recommendation. The recommendation to reject the 2018 Production Increase Application by NIRB creates unnecessary risk for the Mary River Project while the project revenues remain sparse. Those risks to Mary River then risk regional interests, proposed impact monitoring and mitigation measures and enhanced Inuit benefits.

In this letter we are addressing the request to transportation additional iron ore during the present shipping season (11 additional vessels), and, the request to permanently increase the annual limit for iron ore transportation to six million tons per year.

We have a strong interest in seeing the project advance through the Production Increase Application in a manner that supports the realization of Inuit aspirations in the region and helps the company operate revenue positive. The joint QIA / BIMC "Project Stabilization Approach" during 2018 targeted addressing specific Inuit concerns related to the early years of Mary River Project. This resulted in recommitment by BIMC to improved delivery of Inuit benefits to affected communities through the current IIBA, improved delivery of a \$20 million dollar training and employment program under the Skills Partnership Fund (administered by Employment and Social Development Canada). The Project Stabilization Approach also resulted in the negotiation of important enhancements to the IIBA, commitments that are in jeopardy by the NIRB Recommendation. In relation to the 6.0MT operation, additional IIBA enhancements have been negotiated for Pond Inlet in particular, such as an expanded wildlife compensation regime. Additionally, recent site visits to Mary River, with the community have already been held to start advancing improvements to monitoring and mitigation of dust and hunter access to the project area.

Our submissions to NIRB contained detailed explanations of the formal commitments reached as a result of the Project Stabilization Approach. These commitments address specific issues of concern, including terrestrial and marine impacts, and provide direction to improve monitoring activities through collaborative oversight not seen before in Nunavut. The Project Stabilization Approach produced the outline of a renegotiated IIBA that will both stabilize and expand Inuit benefits for the region. These regional benefits could be lost if the viability of the Mary River Project is undermined by the current Project Certificate terms and conditions limiting the annual production level. We feel that NIRB did not give its full attention to the presentation of commitments advanced by Inuit and committed to by the proponent.

Please note that it is a serious concern for Inuit that NIRB, the party tasked with monitoring project certificates it issues, is not adequately resourced to fulfill an adequate monitoring role for projects permitted in Nunavut. Without additional NIRB resources, concerns raised may not be properly reviewed leaving Inuit who experience direct project impacts frustrated and without confidence as to whether the proponent's commitments are being lived up to. The recommendation before you may not have had NIRB's full attention to appreciate the scope of proposed monitoring and mitigation measures, and, enhanced Inuit benefits.

With respect to the 2018 shipping season, we believe the additional transportation of iron ore from Milne Inlet (11 vessels) will not result in significant negative impacts. We also believe adequate monitoring and mitigation plans are in place to oversee these additional activities.

With respect to a permanent increase in iron ore transportation from Milne Inlet we believe the NIRB Recommendation should be varied, and the 2018 Production Increase Application, specifically the increase in iron ore production limits, should be accepted with revised conditions. The outcomes and commitments from the Project Stabilization Approach represent a significant and meaningful improvement for Inuit interests in the region surrounding the Mary River Project. If the NIRB Project Certificate for Mary River is not varied, we are concerned regional benefits would be lost.

Signed,

Mr. Caleb Sangooya MHTO Curves

Mr. Joshua Katasak Hanlet, Pond Inlet

Mr. David Curley QIA Board Member, Pond Inlet

Hule

Mr. Levi Barnabas, QIA Executive Committee Mary River IIBA Co-Chair







CC: Honorable Joe Enook, MLA Pond Inlet

ANNEX A:

SUMMARY OF BENEFITS AGREED UPON DURING RENEGOTIATION OF THE MARY RIVER IIBA.

- QIA and BIM have an agreement in principle regarding a renegotiated IIBA with changes to Inuit Benefits, Inuit Engagement, Governance, and Monitoring and Enforcement. Inuit Benefits includes a focus upon direct project opportunities and benefits such Inuit training, employment and contracting. This document is before the parties for final review. Approval was anticipated in October following the 2018 Production Increase Application. Notable inclusions in the renegotiated IIBA related to Inuit training, employment:
 - a. A commitment of \$10 Million toward the establishment of a Regional Training Centre in Pond Inlet. Efforts are already underway to complete a feasibility design and study for this facility, including locating the building on Inuit Owned Lands.
 - b. A commitment to spend \$2.25 million on training Inuit between 2019-2021 and a commitment to spend \$1.5 million per annum until 2031.
 - c. A commitment to hiring and providing local counselling services in Pond Inlet, Arctic Bay, Clyde River, Igloolik and Hall Beach.
 - d. A commitment to resourcing lunch programs in schools in Pond Inlet, Arctic Bay, Clyde River, Igloolik and Hall Beach.
 - e. An expanded Inuit Human Resource Strategy,
 - i. Hiring of 5 additional staff to implement this strategy (Inuit Human Resource Advisors and Recruiters).
 - ii. Permanent dedicated "Work Ready Program" to be delivered throughout the region
 - iii. Inuit Internship Program targeting employment outside trades and heavy equipment.
 - iv. An Inuit Employment Target of 50%.
 - f. Increased resources for a "Community Wellness Fund" which will provide up to \$1.1M/annum to the communities of Pond Inlet, Arctic Bay, Clyde River, Igloolik and Hall Beach.
- 2. Specific to the 2018 Production Increase Application, QIA and the proponent have also negotiated an expanded Wildlife Compensation regime under the IIBA. This regime includes the following:
 - a. Wildlife Compensation Fund.
 - i. A life of mine commitment to provides direct compensation for specific incidents of loss or damage for Inuit harvesters.
 - ii. Value \$750,000.
 - b. Enabling Fund
 - i. A commitment to provide resources to enable improved hunting and Inuit enjoyment of the project area through the establishment of a gas program. This will support improved affordability of local travel by Inuit.
 - ii. Value \$400,000/year for 10 years. Revisited thereafter.
 - c. Project Monitoring Fund
 - i. Dedicated resources to support independent community based monitoring of project impacts, supplies communities with equipment to monitor and enjoy the marine environment. Projects will be developed and run by the community.
 - ii. Value \$200,000/year for 10 years. Revisited thereafter.
 - d. Marine Equipment Program
 - i. A program whereby every three years the proponent will purchase and subsequently donate to communities a fully-equipped research vessel.
 - ii. Vessels will be given to Pond Inlet, Arctic Bay, Clyde River, Igloolik and Hall Beach.
 - iii. Value \$300,000 per vessel.

ANNEX B: SUBMISSIONS MADE BEFORE THE NUNAVUT IMPACT REVIEW BOARD

Through formal representations filed with NIRB in response to the 2018 Production Increase Application QIA made submissions to NIRB that addressed concerns related to the application and information about BIM commitments.

QIA and the community of Pond Inlet jointly developed a table of topics that were raised during review of the 2018 Production Increase Application. This table included the following topics: Shipping, Dust, Management Plan Updates, Water Compensation Agreement, Inuit Owned Lands Commercial Lease, Roads Management Plan, Current IIBA Implementation, IIBA Renegotiation. On July 11th, 2018 this list was supplied to NIRB prior to the NIRB led community engagement session.¹

On July 16th, the proponent responded to the table of topics and confirmed its commitment to addressing each of the topics listed.² This response was supplied to NIRB during the formal review of the 2018 Production Increase Application. This response included a pledge from the proponent to resource and undertake bi-annual third-party performance audits of the commitments made by the proponent under both the IIBA and the NIRB Certificate, including developing immediate action plans for any topics identified through the audit process.

In addition to the table of commitments, on July 26th, 2018 QIA also presented final technical review comments to NIRB.³ In this submission submitted a list of 45 specific recommendations addressing the following topics; Aquatic Wildlife and Habitat, Terrestrial Wildlife and Habitat, Regulatory Permitting and Engineering, and, Socio-Economics.

On August 9th, 2018 the proponent responded to QIA's final technical review with responses to each of QIA's 45 recommendations. address these commitments was submitted to NIRB.⁴

¹ Qikiqtani Inuit Association, Hamlet of Pond Inlet, Mittimatalik Hunters and Trappers Organization. Letter to Nunavut Impact Review Board. NIRB Review Process, BIMC's 2018 Production Increase Application. July 11th, 2018.

² Baffinland Iron Mines Corporation. Letter to Nunavut Impact Review Board. July 16th, 2018.

³ Qikiqtani Inuit Association. Letter to Nunavut Impact Review Board. NIRB Review Process, BIMC's 2018 Production Increase Application. July 26th, 2018.

⁴ Baffinland Iron Mines Corporation. Letter to Nunavut Impact Review Board. August 9, 2018.

ANNEX C: BAFFINLAND IRON MINES CORPORATION MONITORING, MITIGATION AND ADAPTIVE MANAGEMENT COMMITMENTS. 2018 PRODUCTION INCREASE.



MEMORANDUM

Baffinland Environmental Monitoring, Mitigations and Adaptive Management Overview

Approach to Adaptive Management

Baffinland Iron Mines Corporation (Baffinland) has invested significant efforts in 2018 to further enhance our understanding of the Qikiqtani Inuit Association (QIA) and local community member's concerns related to the current Project and their specific concerns with increasing production and shipping rates to support economically sustainable growth of the Project.

Existing permits requires that Baffinland receives input from QIA, the community (namely Pond Inlet) and other regulators on the results of annual monitoring conducted by Baffinland to confirm the predictions of the Final Environmental Impact Statement for the Project. In addition, Baffinland solicits feedback directly from the communities and other concerned parties to inform operational planning. Feedback from these stakeholders is provided by establishing several different avenues for two-way information sharing (see Table 1). Despite the above efforts, it is acknowledged that there remains some ongoing concerns amongst community members and QIA about the Project and uncertainty in the results in the monitoring programs. To address this Baffinland has implemented a process to develop adaptive management measures and additional mitigations (Figure 1). The adaptive management process allows for Projects-effects monitoring to be assessed at two levels.

First, Project-effects monitoring is conducted and assessed by Baffinland's technical experts and consultants. The results of the monitoring programs are then shared with and assessed by external reviewers and technical specialists, the QIA and local community members.



Table 1 – Project Review Process

Information	Description	Annual	Key Organ	ization						Hamlets
Sharing Activity		Schedule	Nunavut Impact Review Board (NIRB)	Nunavut Water Board (NWB)	QIA	Regulatory Authorities	Working Groups (Government of Nunavut, Department of Fisheries and Oceans, Parks Canda, Environment and Climate Change Canada, Qikiqtani Inuit Association, Mittimatalik Hunter and Trappers Organization)	Technical Experts	MHTOs	Hamlets
Annual Monitoring Program Reports - Draft	Draft report – Results from annual monitoring program for terrestrial and marine monitoring efforts				~	*	~	*	v	
Annual Monitoring Program Reports - Final	Final report – Results from annual monitoring program for terrestrial and marine monitoring efforts. Incorporates feedback received from Working Groups on the draft report	March 31	✓	~	~	✓	✓	~	~	V
NIRB/NWB Annual Reports	Summarizes annual operational activities, monitoring programs and compliance with regulatory permits	March 31	~	~	~	~	✓	~	~	~



Information	Description	Annual	Key Organ	ization						Hamlets
Sharing Activity		Schedule	Nunavut Impact Review Board (NIRB)	Nunavut Water Board (NWB)	QIA	Regulatory Authorities	Working Groups (Government of Nunavut, Department of Fisheries and Oceans, Parks Canda, Environment and Climate Change Canada, Qikiqtani Inuit Association, Mittimatalik Hunter and Trappers Organization)	Technical Experts	MHTOS	Hamlets
Topic Specific Meetings – Shipping etc.	Face-to-face meetings held with MHTO, Hamlets and QIA Representatives to discuss specific issues and concerns and/or key components of Project operations	End and beginning of shipping season, As needed			~			•	✓	
General Project Update Meetings	Annual meetings held with Inuit and QIA representatives to update interested parties on ongoing operations or any proposed changes to the Project	Annually, As needed	✓	~	~	✓	\checkmark	~	~	✓
Site Visits	Visit to the Mary River and Milne Port site to see live operations and discuss issues on the ground	As needed or requested						1	~	~



Information	Description	Annual	Key Organization								
Sharing Activity		Schedule	Nunavut Impact Review Board (NIRB)	Nunavut Water Board (NWB)	QIA	Regulatory Authorities	Working Groups (Government of Nunavut, Department of Fisheries and Oceans, Parks Canda, Environment and Climate Change Canada, Qikiqtani Inuit Association, Mittimatalik Hunter and Trappers Organization)	Technical Experts	MHTOs	Hamlets	
Inspections/ Audits	Regulatory audits or inspections to ensure compliance with existing permits and approvals	Typically during summer (July to September)	~	~	~	~					
Participation in Monitoring Programs	Contract employment opportunity or joint- collaboration on environmental monitoring programs	Summer Field Season (July to October)				*		~	~		
Input into additional mitigation measures	Submission of technical comments and responses or face-to-face meetings to discuss proposed revisions or additions to existing mitigation measures	As needed	*	*	~	*	✓	*	*	✓	

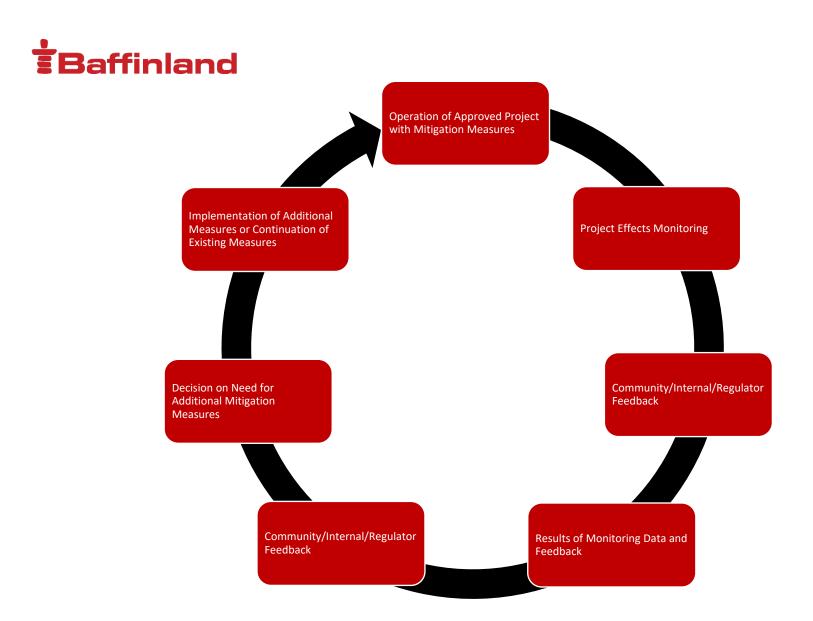


Figure 1 – Baffinland's Adaptive Management Process



Response to Community Concerns

As previously mentioned, while the monitoring results have indicated that the Project is not having a significant or harmful effect on the environment, subsequent assessments conducted by community members and the QIA have identified a lack of certainty in the results of the monitoring programs and concerns related to Project operations. Therefore, throughout 2017 and 2018, Baffinland in consultation with the QIA and Mittamatalik Hunter and Trappers Organization (MHTO / Pond Inlet Hunter and Trappers Organization) determined that additional mitigation measures should be developed and implemented, which ensure a precautionary approach is being applied in Project operations.

In 2018, prominent attention was given by Baffinland to develop additional mitigations and monitoring that meaningfully responds to QIA and Pond Inlet community member's concerns related to shipping operations, marine mammals and dust fall. An overview of the results of the implementation of the adaptive management process executed by Baffinland is presented in Table 2.

Table 2 – Marine and Dust Effects, Monitoring and Mitigation

Торіс	Potential Effect	Pre-2018 Management Plan Mitigations and Commitments	Monitoring Program	Summary of Monitoring Results and Community and QIA Feedback	Additional Mitigation Measures	Reference to commitments made through the NIRB reconsideration process and public record	
	Acoustic Disturbance	As listed in the Shipping and Marine	 Automated Information System – Exact Earth Notifications Bruce Head Vessel-Based Project Ship- Based Observer Program Tremblay Sound Narwhal Tagging Program /Aerial Survey Automated Information 	Marine mammals experience temporary and localized disturbance as a result of Project shipping	 Reduce Vessel Speed to 9 knots within Milne Inlet Apply speed limit to all Project vessels Communicate speed limits to vessel captains through Standing Instructions to Masters (not only ore carriers) Avoid deviation from nominal shipping route Monitor adherence to speed limit and deviation from nominal shipping route through Community-Based Monitoring (installation of Automated Information System at MHTO office) and Exact Earth Notification Alert System 	Response to final written submissions on	
	Change in animal distribution in the region	 As instead in the shipping and Warme Wildlife Management Plan (2016): 1. Maintain constant course and speed when possible 2. Reduce vessel idling time at dock 3. Shipboard and Marine Wildlife Observers to be on select vessels to monitor interactions with marine mammals 	 Automated mormation System – Exact Earth Notifications Bruce Head Vessel-Based Project Ship-Based Observer Program 	Relative population levels (distribution and abundance) are not being affected by the Project Marine mammals tend to avoid vessels		the Mary River Modification Application – Production Increase, Fuel Storage, and Milne Port Accommodations (Baffinland 2018a): Response to DFO Comment No. 1 Response to QIA Comment No. 3 Response to QIA Comment No. 4	
Marine Mammals	Change in abundance in the region		 Automated Information System – Exact Earth Notifications Bruce Head Vessel- Based Project Ship-Based Observer Program 	No ship-strikes have been recorded to date Community members have expressed an ongoing concern for how noise from vessels could be affecting marine mammals or driving them out of the Project area	 Minimize multi-vessel transits within the corridor Avoid sensitive areas that contain critical habitat and/or traditional calving ground 	Response to WWF No. 6 Appendix A Community Fact Sheet "Learn more about Baffinland's shipping and marine monitoring programs" Nunavut Impact Review Board Process	
	Alteration of migration patterns		 Automated Information System – Exact Earth Notifications Bruce Head Vessel-Based Project Tremblay Sound Narwhal Tagging Program /Aerial Survey 		 Work with the MHTO to establish parameters for drifting areas to avoid interaction with important hunting areas in the Inlet Provision of fuel in the amount of \$300,000 annually to enable hunting practices (up to 10 years) 	Guidance – Production Increase Proposal – Additional Information Requirement (Baffinland 2018b) Response to Comment No. 7 a) and c) – BIM / QIA Resolutions and Commitments (Baffinland 2018c) Response to Concern No. 4	
	 As listed in the Shipping and Marine Wildlife Management Plan (2016): 1. Maintain constant course and speed when possible 2. Reduce vessel idling time at dock 3. Shipboard and Marine Wildlife Observers to be on select vessels to monitor interactions with marine mammals 		 Bruce Head Vessel- Based Project Tremblay Sound Narwhal Tagging Program Ship-Based Observer Program 	Relative population levels (distribution and abundance) are not being affected by the ProjectNo ship-strikes have been recorded to dateLocal hunters have reported decreased numbers of marine mammals available for harvesting	 Provision of \$200,000 annually to support community based monitoring and research (up to 10 years) Provision of research vessel to support community initiatives (i.e. monitoring/research etc.) 	Response to Concern No. 5 Response to Concern No. 10	

Торіс	Potential Effect	Pre-2018 Management Plan Mitigations and Commitments	Monitoring Program	Summary of Monitoring Results and Community and QIA Feedback	Additional Mitigation Measures	Reference to commitments made through the NIRB reconsideration process and public record
		As listed in the Inuit Impact Benefit Agreement (2013): 4. Wildlife Compensation Fund		Local hunters have reported disturbances to traditional hunting areas and practices as a result of shipping operations		
Marine Environment	Introduction of Aquatic Invasive Species	As listed in the Shipping and Marine Wildlife Management Plan (2016): 1. Ensure salinity of ballast water is within standards	 Salinity Testing of Ballast Water Aquatic Invasive Species Monitoring 	 All vessels have demonstrated compliance with ballast water exchange via salinity testing of ballast water tanks No Aquatic Invasive Species have been identified through Project monitoring Positive feedback for expanding Aquatic Invasive monitoring to include Ragged Island Community members have reported a concern that Aquatic Invasive are being introduced to the Project area as a result of shipping operations 	 Increased Quality Control and Quality Assurance procedures for salinity testing Use of Remote Operative Vehicle system for underwater video surveys and specimen collection for assessing ship hull fouling 	Response to final written submissions on the Mary River Modification Application – Production Increase, Fuel Storage, and Milne Port Accommodations (Baffinland 2018a) Response to QIA Comment No. 2 - Baffinland Responses to Reviewer Comments on 2017 NIRB Report (Baffinland, 2018d) Response to QIA Comment Number 37 Response to QIA Attachment 2 Comment 5
Dust	Vegetation Abundance and Diversity	 As listed in the Terrestrial Environment Monitoring and Management Plan (2018): Project activities will be planned and conducted to minimize the Project footprint Where and when appropriate, dust 	 Dust Fall Deposition Monitoring Program Vegetation Abundance 	Dust fall deposition is greater (higher volume) than levels predicted in the Final Environmental Impact Statement Higher level of dust fall is not affecting vegetation health and level of metals detected in soil and vegetation are not exceeding regulatory guidelines Vegetation abundance and diversity is	 Six (6) additional dust fall samplers will be installed in late summer/fall of 2018 Dust fall monitors will be placed at the 1 km distance, in three paired locations (east/west of the road) one pair will be located near km 25 	Response to final written submissions on the Mary River Modification Application – Production Increase, Fuel Storage, and Milne Port Accommodations (Baffinland 2018a) Response to ECCC Comment No. 2 Response to QIA Comment No. 6
Dust	Vegetation Health (Metals Accumulation)		Monitoring • Vegetation and Soil Base Metals Monitoring	Consistent with baseline levels Ongoing concern from community members about visual effects of dust fall and geographic extent of deposition Ongoing concern from community members about potential for uptake of metals by mammals harvested by hunters and bioaccumulation	one pair around km 56 one pair around km 75–80 3. Continue increased calcium chloride and water dust suppression 4. Procured 50 additional covers for crushers	BIM / QIA Resolutions and Commitments (Baffinland 2018c) Response to Concern No. 11 Response to Concern No. 12 Response to Concern No. 13

References:

Baffinland 2018a. Mary River Modification Application – Production Increase, Fuel Storage and Milne Port Accommodations Modification Proposal ('Production Increase Proposal') (April 23, 2018) – Response to Comments. August 9 2018. Baffinland 2018b. Nunavut Impact Review Board Process Guidance – Production Increase Proposal – Additional Information Requirement. June 20 2018. NIRB Public Registry ID: 318283 Baffinland 2018c. Baffinland/Qikiqtani Inuit Association Resolution and Commitments Excel Spreadsheet (180802-SR17-QIA-Baffinland2018IssueResolution-ENG). Agreed Upon August 2, 2018 as referenced in QIA's August 3rd letter to NIRB. Baffinland 2018d. Baffinland Response to Reviewer Comments on the 2017 NIRB Annual Report. July 12, 2018.



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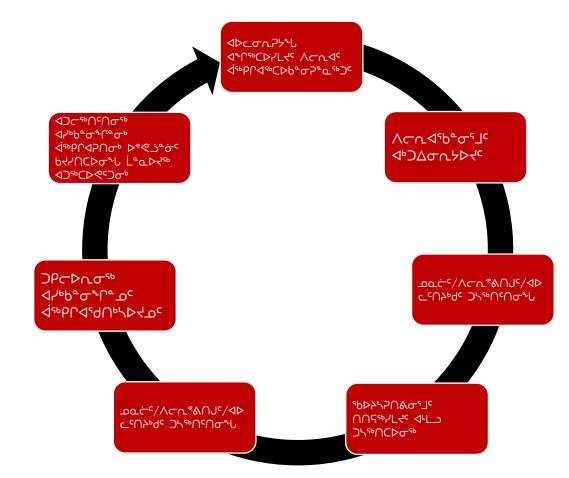
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ϽϚჼϷϹϷႶ·ႶʹႦ·Ϲ ʹσ ^ͺ ʹϷ			ℶ℄℅℄ ⅃ⅆ℧ℶℒ℄℩ ℙ℧ℾⅉℯ	ወሮ እር የገር ሆን ምሳሪ የሀገን ምር	QIA	∟ ር -ᲡᲘJና Ხጋንኦናፁ∩ሶና	ለলኪትኦቲ (ወዉዎና ႱペĽካሪ, ΔĽናፑኦርলኪትካሪ, ΓናህΔረጭልলኪትካሪ, ECCC, QIA, ΓናበĽርሞΓ ላህቢረኮጋሮናየኦካሪና ክበLትዮቦና)	፟፟፟፟፟፟፟፟ጚኯ፝ ዸ₽ኯኯኯኯ ዸጞኯኯኯኯኯኯኯኯኯኯኯኯኯኯኯኯኯኯኯኯኯኯኯኯኯኯኯኯኯኯ	ঀ৽ঀ৾৾৽৸৵ৢ৾৾৾ ৻ৣ৾৾৾৵৸৻৽৾৾৾৾৾৾৾৾৾৾৾৾৾৾৾৾৾৾৾৾৾৾৾৾৾৾৾৾৾৾৾৾৾	Ηવં ^ι ઽઽઔઽઽ
⊲ۥڎٵ٦٦٦ ۥ٩٩٩٩ ۵۵۹۹۶ ۵۵۹۹۶ ۵۵۹۶۶ ۵۵۹۶۶	סילוושי קינש אנס	ል፟®⊅⊲⊂ 15			~	~	~	~	~	
⊲٬ᢏٵϹϳϲ ۥۥ٩۶۶،۹۵ ۵۵۹۹۵ - ۹۶۹۰–۹۶۰۶	ΡϞͿʹϲʹʹϞʹϷϷϭͱϧͼ Ϥ;ϛʹͿϹϹ·ʹϧϷϷϞͻͶϫϭͼ ϼͼͺϳϲϽϼϛϭ;ϥϽϼϛϤϹͻ ΔϹϲͺϷͽϞϚϷͼϷϷϒϲϒ ΛϲʹϭϧϷϚͽϛϧϧϲ Ϸϫϼϳϲ	LY 31	~	~	✓	~	✓	×	~	~
NIRB/NWB ⊲ˤĠJĊĹႪϟϷϤ ϷσʰἑϤ	⊳ে৬৮৭ে বর্ণরেেটে বেচ়ুরুরে,৮৮৭এ৭ে ∧েনর্ব্যক, ৬৮৯২১৫৮ বেদ⊥় ১২৫৫৫৫৫৫৫৫৫৫৫৫৫৫৫৫৫৫৫৫৫৫৫৫৫৫৫৫৫৫৫৫৫৫৫৫	Ĺ약 31	~	~	~	~	~	~	~	~
⊳⁵₺⊳୵⁵ኁጏ⊲ርഛ ˁ b∩Lởና – ⊳៸⊲ናೇ⊲⊂൨൳ኈ, ⊲୵∿Ր՟그.	b೧L5b೧ŕ೦೧೬ b೧Lಕ ငೆಅರ೨ MHTO, Hರ್ತಿಲೆರ ತ್ಟು QIA ಒರಿಇಗಿ ೧೯ ಶ್ ರಿಸಿಗ್ ೧೯ ವಿಗಲ್ ೧೯ ತ್ಟು/ಶಿನ್ ನಿಂದ ನಿಂದ ನಿಂಗನ್ ಗೇ ನಿಂದ ನಿಂದ ನಿಂಗನ್ ಗೇ ನಿಂದ ನಿಂದ ನಿಂದ ಶಿಟ್ ನಿಂದ ನೆಟ್ ನಿಂದ ನಿಂದ ನಿಂದ ನೆಟ್ ನಿಂದ ನೆಟ್ ನಿಂದ ನಿಂದ ನಿಂದ ನಿಂದ ನೆಟ್ ನಿಂದ ನೆಟ್ ನಿಂದ ನೆಟ್ ನಿಂದ ನಿಂದ ನಿಂದ ನಿಂದ ನಿಂದ ನಿಂದ ನಿಂದ ನಿಂದ	∆৴ঀ ঀ৾৾৾৾ ৲িঀ৾৽৾ৢ ⊳৾৾৾ঀঀ৾৽৾৾৾ঀ ৲৾ঢ়৾৽ ৲৾৾ঀ৾৽৾৾৾ঀ৾৾৾৾৾৾৾৾৾৾৾৾ঀ৾৾৾৾৾৾৾৾৾৾৾৾৾৾			~			~	~	

ጋኣናካታው	ᡆ᠊ᠫᡆ᠋᠋᠘ᢛᡃ᠈᠈᠊ᡃᠺ	ለል ^ь ኁኄ [ୁ] ልኈႱ	ۅڎۦؠڶ٩ؠڔڔۄ	CΔc						
ϽϞჼͱϹϷႶ·ႶʹႦ·Ϲ ^ϛ σ ^{ናϷ}			౨௳⋗℉ ⋖ペ∩൳൨൳഻ൄ ₽∩∟ኦ	ጔዒፇናΓ ΔLርጊን⊧đና b∩Lንኈቦና	QIA	۲ር-ቦሀን _ሪ የጋչኦሪሀႱሪ	ለলኪትዑቲና (ወዉዎና ሁዊLၿძና, ΔLናΓϷϹলኪትၿძና, ΓናኄህΔረጭልলኪትၿძና, ECCC, QIA, ΓናበLርሮዞΓ ⊲ኚህዉረኮጋሮናየትၿძና ይበLት∿ቦና)	ጘዾጘ፞፞፞፞፝፝ጚኯፙ ዸ₽ኯኯኯ ዸ	⊲୶୳୰୷୷⊃ ୷୰୶୶	H٩ં٢٢
ለ⊏൨⋖ჼ⅃ჼ Ϸ՟ ℶℾ⅃ℹ∿ ႱჃႫჼ Ͻ Ϟ ჼႶናႶႫჼ⅃ჼ ႱႶ L Ⴋჼ	Ϥ·ϚͺϳϹͺϹͺϷ·ϒϷͶΓϷ ϷϹͺͰͽϘͿϤ Ϸ·ͺϾϿϭϫͼ Ϥ·ϹͺͻͺͺϘͿϤͺϷ·ͺϾϫϽϛϫͼϹ Ϸʹ·ͻϹͺϳϞͺϲͰϭͼͺϽϚʹͼͶϹϷʹ·ͻϹϷ ͶϲͺϚͼϬϹϷ;ͰϹ;ϚͺϹϹϽͿʹ· Ϸ;;ϲϤ Ϸͺϫ;ͼϲͺϤϧϧϧͼϹϷ;ϹͰϭͼ Ͷϲϲͺϥ;ϒϧͼ	⊲ ^ۥ ڎ۬ٵۮڶ؞ ۵℃ل٦⊲ۥ٩٤٦ ۲	~	~	*	~	~	~	~	~
ለল∿《ል⊳⊀⅃ና ≻∟ና℉ታና	[、] どくしっ (よう) 、 、 、 、 、 、 、 、 、 、 、 、 、	ᠵᡄᡅ᠊᠌ᠫᡃᢑᡅ ᢦ᠋ᡃᢐ᠆< ᢄᢞᡇᡱᢩ᠈ᡷᠥ ᡔᢧᡕᡩᠧᢧ᠘᠊<ᠵ						~	~	~
^ϛ ϷϷϞϞʹϭϲ ʹϷϲϷϞΔϲ ʹϷϷϞ Ϟʹ ϷϹϷϭʹͼϲϲ	L౯౿౧ౢౢౢౢౢౢౢఄఄఀౖౢౢౢౢౢౢౢౢౢౢౢౢౢౢౢౢౢౢౢౢౢౢౢౢౢౢౢౢ	⊲⊳۶₀qча (۲⊂۷۲۲ ۲∪√√٦٤)	~	~	~	~				
᠘ᡄᢂ᠋ᡃᡉᢗᢂ᠋ᡔᠮ ᠈ᡃᡉᢂ᠋ᢣ᠋ᠮᠳ᠋ᡗ		⊲⊳ን⊧ዋ ⊃⊄L (ሩ⊂∇Le ⊲⊳ጋ⊲ገe)				Ý		~	~	
ጋኣኈር⊳Ϟϲ ϹLጋ⅃ኈቦ ዻኁ₽₽ჾۍջቦϿϲ ዻ፞፨ᲮႱዻ֎ኯኁጘ⋃Ϸ ጘϿϲ	⊃రా/రో \൨√ఁ౧ర్'ఎ ▷⁵b▷/▷⊀రి འၬ౨ ዖ▷᠈⊀౧రా ▷⁵b▷/ኄ℃೨೧° ◊ቴ₽ᡗ⊲₻ᢗ▷⊀L⊀రా ▷《⋞౨°రం ՃᲚᡗঀ२ᡣᢗᡡ Ű൨▷⊀Ⴊ 衣☜₽ᡗ⊲ᢑ∩൨᠈⊀౧൧	᠕ᡃᢣ᠌ᢂ᠋ᢣ᠘᠋ᡏᡃᠥᠮ᠍ᠵᡄ	~	~	~	×	~	~	~	~



$\frac{\rho \nu' + \rho \nu}{\rho \nu' + \rho \nu} = \frac{\rho \nu' + \rho \nu}{\rho \nu' + \rho \nu} = \frac{\rho \nu' + \rho \nu}{\rho \nu' + \rho \nu} = \frac{\rho \nu' + \rho \nu}{\rho \nu' + \rho \nu' + \rho \nu} = \frac{\rho \nu' + \rho \nu}{\rho \nu' + \rho \nu' +$

Ѵҁ┥⋃⊳┽ኈ	⊲⋼⊃⊽௳ℯ₽₅⊄ℯ௳	⊀୭ჾჃႱ-2018 ৰ⊳ᡄና∩ჾჼ⅃ና <ჼ௳⊳∩ ∧ჂჃჼՐՈናႶჾჼჼᲐϷႭłჃჼჾჼ⅃ና ჃႱჂ ለলႭჃჼኣႭታϷႵჲና	᠋᠄ᡃᡉᢂ᠋ᢣᡪᠳ᠋ᢑ	ڡ۵ف ^ۥ ۵۷۲۹ نه۵۹۹۵۲ مېد مې۲۶ مې۲۹۵ مې۲ت ،۵۵۵۹ م۵۹۹۵ ک۲،۵۵۵۹۲۵ مېد	۲۰۵۰۵۵۹۵۹ የምንግን የምንግሳሌ አግፋዎዓላሉ ንርጭዮንዋጋጭርው	ለናብባያትርጋና ለራጥፈኒምሏልሳትና ኦባህን NIBB-ግሩ ወናምንይትሪያንሀንይትላያው ብናርግ ኤሳንይትረራይ ሀገረምንግም
	ᡏᡩ᠙ᢣᢩᠣᡕ᠆<ᡲ᠋᠔ᡗᠴᢛ	በበናኈር⊳ፖレሩ ር°≪σ ⊳Γ⊲ናל⊲፫Ⴠσኁኌና ⊲୳∟ኌ	 		 ఊరదరాత్పరికర్ండా ఎగి ర్గార్కర్ కొల్లితరా ఊరిదారింద్రంగా సిందిందింది దిందిందిందిందిందిందిందిందిందిందిందిందింద	
	⊲ሥኑንጭሁ Ϸϲ๙ ዹσ°σ∿ን℃ ϹĹσ ΔĹσ	 ΔL⁴ΓΡCσ^b 4Ρ_C⁴Cησ⁴J⁴ <⁴₀ <⁴₀	 	 C C	してしんよやべ や「くいくせっへからく つの (ベロレンクム・ロト・マンゴ レンやくくくつらく) ンド イ・ドアレムぐしてつの レ「くいくつらく) ンド イ・ドアレムぐしてつの レ「くいくつらく) ンド イ・ドアレムぐしてつの レ「くいくつらく) ンド イ・ドアレムぐして、つの レ「くいくつらく) ンド イ・ドアレムぐして、つの レ「くいくつらく) ンド イ・ドアレムぐして、つの レ「くいくいろ」 シャ イ・ドロ・レーシー イトレーシー イン・レーシー イトレーシー イン・レーシー イトレーシー イン・レーシー イトレーシー イン・レーシー イトレーシー イン・レーシー イレーシー イレーシー イレーシー	Ρ>*
	⊲ሥኦ⁵σ∿ሁ Ϸഛ∿ጋσ∿ՐϹ ϹĹσ ΔĹσ	3.	 			
ᢗᡅ᠌Ϸᡃᡗᠮ᠌Ϸᢗ᠘ᡃ ᠋ᠳ᠋ᡃᡳᡣ᠋᠄	∆ [∿] ՐჼናσႢᢣ [∿] ՐϹ ∢ሥኦነσ ^ኈ ቦና		 AIS ⁵bP³+²P¹ - ム⁺C²C²C²G³+²D² b²+³b²+²D² d²+²C²C² d²+²C²C² d²+²C²C² d²+²C²C² d²+²C²C² d²+²C² d²+² <lid<sup>2</lid<sup>			
	ለር ^ና ው°σኪታ ^ኈ ሁ ΔLናΓኦርσ ^ь σናረበσ ^ь ⊲ኄህዉሥናኦርσናጋና	 ΠΠϚჼϷϹϷ៸ͰͺϞʹჼϷ ϹʹϐʹϘϭ ϷΓϤʹϞϟϤϲͺͺͺϭ·ʹͿϚ Ϥ^L ΔL^SΓϷϹσ⁶ ϤϷϲ^SΠσ⁵ Ϳ^C <^SΔϷΠΓ (2016): 1. CLϷ_Δ^bΔ^Δ_Δ^C⁶ Δ^kΓ^SϚ^Q^C ͻΠ^b Ϥ^L Δ^k ^{λ^b}bσ⁵b^C ϽΠ^b Ϥ^k²⁴^{C²} ^{C²} 2. ΛC⁵b₂ ϽϤ⁵ Δ^k² Γ² Γ^C ϷΓ⁴³⁴ 2. ΛC⁵b₂ ϽϤ⁵ Δ^k² Γ² Γ² Γ² Γ² Γ² 3. ϷΓϤ⁵⁴⁴ Ϥ^L Δ^k² Γ² Γ² Γ² Γ² Γ² Γ² 3. ϷΓϤ⁵⁴⁴ Γ⁴ Δ^k² Δ^k² Γ² Γ² Γ^k⁴ 3. ϷΓϤ⁵⁴⁴ Γ⁴ Δ^k² Δ^k² Γ^{k²} Γ^{k²} Γ^{k²} Δ^{k²} Γ^{k²} Γ^k	 Δ_۵ Δ_3 Κ Κ Λ C Δ⁵ Γ Δ⁵ Γ Δ⁵ 	ϷϿჼσ ^{\$} Γ ^c (ϱσ ⁵ b ^c C ⁵ σ ^{\$} Γ ^c Ϥ ^L L ³ ϷΔ ⁶ ⁵ ³ σ [*] Γ ² Δ ^c) Φ ⁵ ⁵ ⁶ C ² ⁴ ^C ² ^c Α ⁵ ⁵ ²	 Φυαλοστηλοφηρος σειθηλομουρουσια Φυαλοστοιομουρουσιο Φυαλοστοιομουρουσιο Φυαλοστοιομουρουσιο Φυαλοφορουσιο <l< td=""></l<>	

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ርሊ⊳′ ଏ୧∩∿ሁ	ͺϫͺͻͺϫͺΔ ^{;ϧ} ϟʹϒ·ͺΔĹϭ ϹĹϭ·ϚΓϷϹϽʹϧϷͽʹϒϲϽͼ ϷͺͺϟϪͼ	ΠΩϚჼჼϹϷϟͺͺͰͺϲ·ʹͺͻϹͼ ϷϹϥ;ϥϭϲͺϲϭͼʹͿͼͺϥͱϹϿͺΔϹͼϹϘͼ ϤϷϲͺͼϹϿͼ;ͿͼͺϚͼϼϷϹͿϚ (2016): 1. ͼϷϷϟϹͼϟͼϹϤϥͼϿϭͺϹͺϲϷʹͽͿϭ΅ϧ ϧͼͼϧϟϹͺͼϲϷϧͻϥͼϹϫϳϲ	 Ο C C Δ^cC^wdCϷ^sb^cC^wDΓ^b ΔLσ CLσΓΡCϽ^sb^sρ^cC^c ΔL ΔL ΔL ΔL 	CL [§] Γ [®] ΡΓϤ [§] [†]	 ΔεΓ4⁵ ω 4ΡεζΡσ⁶υω⁶/ΛΡσ⁶υω⁶ 4Ο4⁶ν³ν⁴Λ⁶ CαΡΓ⁶ ⁶ ⁶ ⁶ ⁶ ⁶ 4Ο⁵σ⁶ P⁶υ⁷CΓ 4Ρεζ⁶Λ³ΛΡ⁴ω⁶ ⁶ ΔLΡ⁵ 4Ċσ 4Ρεζ²CP³Λ³σ⁶ ⁵ΔΕ⁵ 4⁵σ⁵ ⁴¹ ⁶ ⁶ ⁶ ⁶ ⁶ ⁶ ¹ ⁶ ⁶ ⁶ ⁶ ⁶ ⁶ ⁶ ⁶ ⁶ ⁶ ⁶ ⁶ ⁶ ⁶ ⁶ ⁶ <li<sup>6 <li<sup>6 ⁶ <li<sup>6</li<sup></li<sup></li<sup>	 Ρ▷ኣረብ ዮህʹ·ϲ·ͽ· □ ϳϞΓ ϭʹͽϷ° ∩ ϭʹϧ ͼʹϧ ͼʹϲ Ϙʹͼ Ϙϲ ͼʹϫ - ▷ Ϟ ϛͼ ͼ ϲ Ϸ ϲ ϲ ϲ ϲ ϲ ϲ ϲ ϲ ϲ ϲ ϲ ϲ ϲ ϲ ϲ ϲ
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בילהתאיט 2018d. בילהתאיט יידיאסאי מייבע איריש יידיאסאי בילהתאיט 2017 NIRB-ט פילטכביאר איריש גער איריש גער 12, 2018.

ANNEX D: PROPOSED REVISIONS TO NIRB PROJECT CERTIFICATE, CONDITION 179

Term and Condition No. Category: Responsible Parties: Project Phase: Objective: Term or Condition: Reporting Requirements:	 179 (a) Operational Variability/Flexibility The Proponent Operations To ensure that there are appropriate limits on the Early Revenue Phase Proposal marine shipping component in order to limit and manage likely project effects, while balancing the need for operational flexibility. In any given calendar year, the total volume of ore shipped via Milne Inlet, shall not exceed 4.2 6.0 million tonnes. For each year after the Proponent commences shipping ore via Milne Inlet
nepoting requirements.	under the Early Revenue Phase Proposal, the Proponent shall include in the Annual Report to the NIRB, a summary of the total amount of ore shipped via Milne Inlet for the previous calendar year.
Term and Condition No.	179 (b)
Category:	Operational Variability/Flexibility
Responsible Parties:	The Proponent
Project Phase:	Operations
Objective:	To ensure that there are appropriate limits on the Early Revenue Phase Proposal project land transportation component in order to limit and manage likely project effects, while balancing the need for operational flexibility.
Term or Condition:	In any given calendar year, the total volume of ore transported by truck on the Milne Inlet Tote Road shall not exceed 4 .2 6.0 million tonnes.
Reporting Requirements:	For each year after the Proponent commences transportation of ore via the Tote Road under the Early Revenue Phase Proposal, the Proponent shall include in the Annual Report to the NIRB, a summary of the total amount of ore shipped via the Tote Road for the previous calendar year.
Term and Condition No.	179 (c)
Category:	Operational Variability/Flexibility
Responsible Parties:	The Proponent
Project Phase:	Operations
Objective:	To ensure that commitments made by the proponent with respect to the 2018 Production Increase and delivery of benefits to Inuit are adhered to, and, can be demonstrated through a body of evidence.
Term or Condition:	In the calendar year 2019 and 2020, the proponent shall be required to resource and support a third party to conduct performance audits of commitments made by the proponent to affected communities and Inuit of the Qikiqtaaluk region in relation to both the IIBA and the revised terms and conditions of the Project Certificate as of the 2018 Production Increase. Audits shall be overseen and directed by the Executive Committee of the IIBA.
Reporting Requirements:	On a bi-annual basis, the proponent shall file a Performance Audit Report" with NIRB. This report shall include the findings of the third-party auditor, and, Baffinland's commitment to addressing the findings the auditor.