



February 28, 2025

Karén Kharatyan
Director, Technical Services
Nunavut Water Board
Gjoa Haven, Nunavut, X0B 1J0

Re: 2AM-MRY1325 Type A Water Licence Short Term Renewal Application

Dear Mr. Kharatyan,

In its *Pre Hearing Conference Decision Report regarding Renewal Application for Type A Water Licence No. 2AM-MRY1325 dated December 19, 2024* (the **Prehearing Conference Report**), the Nunavut Water Board (**NWB**) included a recommendation for Baffinland Iron Mines Corporation (**Baffinland**) to bring an application for a short term renewal of up to 180 days of the Water Licence under s. 9(1) b) of the *Nunavut Waters Regulations*, SOR/2013-693 (**Regulations**), to provide a bridging mechanism in the event there is any potential gap between the expiry of the Type A Water Licence and the NWB and Minister's completion of decision making for the renewal licence (**Renewal Licence**) application filed with the NWB in June 2024 (the **Renewal Application**).

Baffinland acknowledges the rationale for this request as set out by the NWB. Additionally, in January 2025 the federal government announced there will be a change in leadership and there continues to be potential for an early federal election. Taking into account all of these factors, Baffinland encloses an Application for Short Term Water Licence Renewal (the **Short Term Renewal Application**) for the NWB's consideration.

If possible, Baffinland does not wish to operate under a "short term" licence, which could create potential for confusion within the community. Baffinland filed its Renewal Application in June 2024 in accordance with all applicable NWB guidance and it continues to have a reasonable expectation that the NWB and Minister can complete their decision-making process on the Renewal Application prior to June 10, 2025. The potential delays in the issuance of the Renewal Licence are not due to factors within Baffinland's control. It is important that the issuance of a Short Term Water Licence not inadvertently extend the Renewal Licence process.

Therefore, should the NWB issue a Short Term Water License Baffinland asks that the NWB include a contingency term that is clear that the Short Term Water Licence is only to come into effect in the event that the Renewal Licence is not issued by June 10, 2025. This approach would serve the "bridging" function desired by the NWB, as well as encourage all parties to complete the processing of the Renewal Application in a timely manner, prior to expiry of the current Type A Water Licence.

February 28, 2025

Sincerely,

A handwritten signature in blue ink, appearing to read "Elisabeth", with a stylized flourish at the end.

Elisabeth Luther
Senior Manager, Regulatory Affairs

Cc: Lou Kamermans, Senior Director Sustainable Development

Enclosed:

- *Attachment 1. SHORT-TERM WATER LICENCE RENEWAL APPLICATION*



SHORT TERM RENEWAL

Application for Water Licence Renewal

Document Date: April 2013

Application Submission Date: 02/28/2025
Month/Day/Year

P.O. BOX 119
GJOA HAVEN, NUNAVUT
XOB 1J0
TEL: (867)360-6338
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OFFICE DES EAUX DU NUNAVUT

DOCUMENT MANAGEMENT

Original Document Date: April 2010

DOCUMENT AMENDMENTS

	Description	Date
(1)	Updated for public distribution as separate document from NWB Guide 7	June 2010
(2)	Updated NWB logos and reformatted table to allow rows to break across page	May 2011
(3)	New NWB logo and request for background information	April 2013
(4)		
(5)		
(6)		
(7)		
(8)		
(9)		
(10)		



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NUNAVUT WATER BOARD

NUNAVUT IMALIRIYIN KATIMAYIT

OFFICE DES EAUX DU NUNAVUT

APPLICATION FOR WATER LICENCE RENEWAL

Your application may be classified as a **renewal** only if all operations remain the same as previously licensed and only the term of the licence requires change. If your application contemplates:

- a change to the volume of water authorized for use;
- a new activity related to water use or waste disposal;
- a new component related to water use or waste disposal;
- a change in predicted environmental impacts(s); and/or
- a change to any term or condition of the original licence

your application is **NOT** classified as a renewal but rather an amendment and will require submission of an Application for Water Licence Amendment. Licensees applying for combined renewal / amendment are also referred to the Application for Water Licence Amendment.

The applicant is referred to the NWB's Guide 7: Licensee Requirements Following the Issuance of a Water Licence for more information about this application form.

Where possible, provide background information regarding the original licence application or attach previously submitted information.

EXISTING LICENCE NO: 2AM-MRY1325

1. LICENSEE CONTACT INFORMATION

Is the licensee the same as that referred to on the existing licence?

☒ Yes ☐ No

If No, a licence assignment must be completed and approved by the NWB. **A renewal will only be issued in the name of the current licensee in the absence of assignment of the licence.**

If the licensee is the same, but the name of the licensee has changed, attach a certificate of name change.

Name: **Baffinland Iron Mines Corporation**

Address: **#300 – 360 Oakville Place Drive, Oakville, Ontario, L6H 6K8**

Phone: **(416) 364-8820 x5510**

Fax: **(416) 364-0193**

e-mail: elisabeth.luther@baffinland.com

2. LICENSEE REPRESENTATIVE CONTACT INFORMATION – If different from Block 1.

Name: _____

Address: _____

Phone: _____

Fax: _____

e-mail: _____

(Attach authorization letter.)

3. NAME OF PROJECT

Is the name of the project the same as that considered in the existing water licence?

☒ Yes ☐ No

Indicate the name of the project including the name of the location: **Mary River Project, Qikiqtani Region, Nunavut**

4. LOCATION OF UNDERTAKING

Is the location of the undertaking the same as that considered in the existing water licence?

☒ Yes ☐ No

Project Extents

NW: Latitude: (72° 05' 00" N)

Longitude: (77° 45' 00" W)

NE: Latitude: (72° 05' 00" N)

Longitude: (81° 00' 00" W)

SE: Latitude: (69° 49' 00" N)

Longitude: (81° 00' 00" W)

SW: Latitude: (69° 49' 00" N)

Longitude: (77° 45' 00" W)

Camp Location(s)

Latitude: (° ' " N)

Longitude: (° ' " W)

Camp	Latitude	Longitude
Milne Port Camp	71° 52' 53.06" N	80° 54' 4.36" W
Mine Site Exploration Camp	71° 19' 30" N	79° 22' 40" W
Mine Site Construction Camp	71° 18' 50.39" N	79° 17' 11.35 W
Mine Site Permanent Camp	71° 18' 50.39" N	79° 17' 11.35 W
Ravn River Camp	71° 07' 49.25" N	78° 22' 2.76" W
Mid-Rail Camp	70° 58' 20" N	78° 22' 15" W
North Cockburn Camp	70° 34' 58.11" N	78° 21' 28.80" W
South Cockburn Camp	70° 27' 52.47" N	78° 22' 24.13" W
Steensby New Camp	70° 19' 1.42" N	78° 25' 48.6" W
Steensby (Existing Camp)	70° 17' 40.55" N	78° 29' 21.88" W
Steensby (46 Person Camp)	70° 19' 36.92" N	78° 29' 9.30" W

5. MAP

Are the locations of the main components of the undertaking the same as those considered in the existing licence?

☒ Yes ☐ No

Attach a topographical map, indicating the main components of the undertaking.

NTS Map Sheet No.: 37F, 37G, 47H

Map Name: _____

Map Scale: 1:250,000

In support of this Short Term Licence Renewal application, see Figures 5.1 and 5.2 in the Supporting Information Document prepared by Knight Piésold (component of full renewal application dated June 26, 2024)

6. NATURE OF INTEREST IN THE LAND

Is the nature of the interest in the land the same as that considered in the existing water licence?

☒ Yes ☐ No

Check any of the following that are applicable to the proposed undertaking (at least one box under the 'Surface' header must be checked).

Sub-surface

☐ Mineral Lease from Nunavut Tunngavik Incorporated (NTI)
Date (expected date) of issuance: _____ Date of expiry: _____

☒ Mineral Lease from Indian and Northern Affairs Canada (INAC)
Date (expected date) of issuance: _____ Date of expiry: _____

Mineral Leases #2483, 2484 and 2485

Expires: August 27, 2034

Surface

☒ Crown Land Use Authorization from Indian and Northern Affairs Canada (INAC)
Date (expected date) of issuance: _____ Date of expiry: _____

Foreshore Lease 47H/16-1-2 and Lease Amendment 47H/16-1-5	Expires: June 30, 2035
Tote Road and Borrow Area Land Use Permit N2019Q0011	Expires: June 29, 2026
Bruce Head Land Use Permit N2019J0010	Expires: June 29, 2026
Steensby Land Use Permit N2019C0009	Expires: June 29, 2026

☐ Inuit Owned Land (IOL) Authorization from Kitikmeot Inuit Association (KIA)
Date (expected date) of issuance: _____ Date of expiry: _____

☐ IOL Authorization from Kivalliq Inuit Association (KivIA)
Date (expected date) of issuance: _____ Date of expiry: _____

☒ IOL Authorization from Qikiqtani Inuit Association (QIA)
Date (expected date) of issuance: _____ Date of expiry: _____

Inuit Owned Land (IOL) Commercial Lease Q13C301

Expires: Dec 31, 2043

☐ Commissioner's Land Use Authorization
Date (expected date) of issuance: _____ Date of expiry: _____

☐ Other
Date (expected date) of issuance: _____ Date of expiry: _____

Is the name of the entity(s) holding authorizations the same as that considered in the existing water licence?

☒ Yes ☐ No

If No, a licence assignment must be completed and approved by the NWB.

Name of entity(s) holding authorizations: _____

7. NUNAVUT PLANNING COMMISSION (NPC) DETERMINATION

Is the undertaking located in the same land use planning area as considered in the existing licence?

☒ Yes ☐ No

Indicate the land use planning area in which the project is located.

☒ North Baffin
☐ South Baffin
☒ Akunnig

☐ Keewatin
☐ Sanikiluaq
☐ West Kitikmeot

Was a land use plan conformity determination required from NPC prior to the issuance of the existing water licence?

☒ Yes ☐ No

If Yes, indicate date issued and attach copy.

The North Baffin Regional Land Use Plan (NBRLUP; Nunavut Planning Commission, 2000) was amended three times (Amendments No. 1, 2 and 3) establishing the transportation corridors that enable the Approved Project to proceed (Nunavut Tunngavik Inc., Government of Canada, and Government of Nunavut, 2024; Nunavut Planning Commission, 2018; Nunavut Planning Commission, 2014).

Does the proposed renewal change the original NPC conformity determination or the need to obtain one?

☐ Yes ☒ No

If Yes, indicate date issued (or expected) and attach a copy. _____

If No, provide written confirmation from NPC confirming that a land use plan conformity review is not required.

In support of this Short Term Licence Renewal application, see Appendix B of the Application and Supporting Information Document.

8. NUNAVUT IMPACT REVIEW BOARD (NIRB) DETERMINATION

Was a screening determination required from NIRB prior to the issuance of the existing water licence?

☒ Yes ☐ No

If Yes, indicate date issued and attach copy. **Project Certificate No. 005, Amendment No. 5, Nov 17, 2023**

Does the proposed renewal change the original NIRB screening determination or the need to obtain one?

☐ Yes ☒ No

If Yes, indicate date issued (or expected) and attach a copy. _____

If No, provide written confirmation from NIRB confirming that a screening determination is not required.

9. DESCRIPTION OF UNDERTAKING

Is the description of the undertaking the same as that considered in the existing water licence?

☒ Yes ☐ No

List and attach plans and drawings or project proposal.

In support of this Short Term Licence Renewal application, see Volume 3 (Project Description) and Appendix 3B (Type A Water Licence Application) of the Final Environmental Impact Statement (Baffinland, 2012).

10. OPTIONS

Are the alternative methods and locations that were considered to carry out the project the same as those considered in the existing water licence?

☒ Yes ☐ No

Provide a brief explanation of the alternative methods or locations that were considered to carry out the project.

Alternative methods and locations were considered in the 2012 Final Environmental Impact Statement. See Section 3.0 of Volume 1 (NIRB Registry No. 285303-285309) and Section 6.0 of Volume 3 (NIRB Registry Nos. 285337-285343)

11. CLASSIFICATION OF PRIMARY UNDERTAKING

Is the primary undertaking the same as that considered in the existing water licence?

☒ Yes ☐ No

Indicate the primary classification of undertaking by checking one of the following boxes.

☐ Industrial

☒ Mining

☐ Conservation

☐ Municipal (includes camps/lodges)

☐ Power

☐ Agricultural

☐ Recreational

☐ Miscellaneous (describe below):

See Schedule I of the *Nunavut Waters Regulations* for Description of Undertakings.

12. WATER USE

Is the type(s) of water use(s) the same as that considered in the existing water licence?

☒ Yes ☐ No

Check the appropriate box(s) to indicate the type(s) of water use(s) being applied for.

- | | |
|--|--|
| <input checked="" type="checkbox"/> To obtain water for camp/ municipal purposes | <input type="checkbox"/> To divert a watercourse |
| <input checked="" type="checkbox"/> To obtain water for industrial purposes | <input checked="" type="checkbox"/> To modify the bed or bank of a watercourse |
| <input checked="" type="checkbox"/> To cross a watercourse | <input type="checkbox"/> Flood control |
| <input checked="" type="checkbox"/> To alter the flow of, or store water | |
| <input type="checkbox"/> Other: _____ | |

13. QUANTITY OF WATER INVOLVED

Is the source of water the same as that considered in the existing licence?

☒ Yes

☐ No

Name of water source(s): _____
(show location(s) on map)

In support of this Short Term Licence Renewal application, see full renewal application dated June 26, 2024. Section 5 of the Application and Supporting Information Document presents water stations and volumes in Tables 5.1 to 5.3, and locations on Figures 5.1 and 5.2. No changes are requested to current water sources.

Is the quality of the water source and its available capacity the same as that considered in the existing licence?

☒ Yes ☐ No

Describe the quality of the water source(s) and the available capacity(s):

In support of this Short Term Licence Renewal application, see full renewal application dated June 26, 2024. Section 5 of the Application and Supporting Information Document presents a discussion of water quality and available capacities. No changes are requested to current water sources or volumes.

Is the overall estimated quantity of water to be used the same as that considered in the existing licence?

☒ Yes ☐ No

Provide the overall estimated quantity of water to be used:

Domestic and industrial water use during construction: 1,898 m³/day (see Table 2 on page 17 of the Licence)

Domestic and industrial water use during operation: 967 m³/day (see Table 3 on page 18 of the Licence)

Other water uses during operation: 967 m³/day (see Part E, Item 4 on page 17 of the Licence)

Dust suppression: 1,500 m³/day (see Part E, Item 25 on page 20 of the Licence)

No changes are requested to current water volumes.

Are the quantity(s) of water to be used from each source the same as those considered in the existing licence?

☒ Yes ☐ No

Provide the estimated quantity(s) of water to be used from each source:

See Tables 2, 3, and 2-3 of the existing Water Licence. No changes are requested.

Are the quantity(s) of water to be used for each purpose the same as those considered in the existing licence?

☒ Yes ☐ No

Provide the estimated quantities to be used for each purpose (camp, drilling, etc.):

See Tables 2, 3, and 2-3 of the existing Water Licence. No changes are requested.

Are the method(s) of extraction the same as those considered in the existing licence?

☒ Yes ☐ No

Describe the method(s) of extraction:

The methods of extraction are described in the approved Fresh Water Supply, Sewage, and Wastewater Management Plan. No changes to current approved methods are requested in this Short Term Licence Renewal application.

Are the quantity(s) of water returned to source(s) the same as those considered in the existing licence?

☒ Yes ☐ No

Estimated quantity(s) of water returned to source(s): **0 m³/day**

Are the quality(s) of water(s) returned to source(s) the same as those considered in the existing licence?

☒ Yes ☐ No

Describe the quality(s) of water(s) returned to source(s): **Not applicable**

14. WASTE

Are the type(s) of waste(s) to be generated and/ or deposited the same as those considered in the existing licence?

☒ Yes ☐ No

Check the appropriate box(s) to indicate the types of waste(s) generated and deposited.

- | | |
|---|--|
| <input checked="" type="checkbox"/> Sewage | <input checked="" type="checkbox"/> Waste oil |
| <input checked="" type="checkbox"/> Solid Waste | <input checked="" type="checkbox"/> Greywater |
| <input checked="" type="checkbox"/> Hazardous | <input checked="" type="checkbox"/> Sludges |
| <input checked="" type="checkbox"/> Bulky Items/Scrap Metal | <input checked="" type="checkbox"/> Contaminated soil and/or water |
| <input type="checkbox"/> Animal Waste | |
| <input type="checkbox"/> Other (describe): _____ | |

15. QUANTITY AND QUALITY OF WASTE INVOLVED

Are the quantity(s) of the types of wastes involved the same as those considered in the existing licence?

☒ Yes ☐ No

Are the composition(s) of the types of wastes involved the same as those considered in the existing licence?

☒ Yes ☐ No

Are the method(s) of treatment for the types of waste involved the same as those considered in the existing licence?

☒ Yes ☐ No

Are the method(s) of disposal for the types of waste involved the same as those considered in the existing licence?

☒ Yes ☐ No

For each type of waste indicated in Block 14, describe its composition, quantity in cubic meters/day, method of treatment and method of disposal.

No changes to the current approval relating to waste are requested in this Short Term Licence Renewal application. The waste types, quantities and disposal methods remain unchanged, as described in Table 4-4 of the March 31, 2014 version of the Waste Management Plan (provided below):

TABLE 4-4: ESTIMATED DOMESTIC SOLID NON HAZARDOUS WASTE GENERATION

Waste	Waste Source	Disposal Method	Est. Total Annual Production (tonnes)
2014 WORK PLAN			
Organic	Kitchens	Incinerator	439
Paper	Packaging/Offices	Incinerator/On-site landfill	126
Plastic	Offices/Camps	Incinerator ² /On-site landfill	90
Cardboard	Packaging/Camps	Incinerator	96
Cloth	Camps	Incinerator	29
Multi-Material	Packaging/Camps	Incinerator/On-site landfill	21
Metal	Packaging	On-site landfill	12
Glass	Camps	On-site landfill	12
Wood	Packaging	Incinerator	8
ERP OPERATIONS PHASE (incl. 18 Mt/a Construction Phase w/o Rail Camps)			
Organic	Kitchens	Incinerator	11526
Paper	Packaging/Offices	Incinerator/On-site landfill	3302
Plastic	Offices/Camps	Incinerator ² /On-site landfill	2362
Cardboard	Packaging/Camps	Incinerator	2515
Cloth	Camps	Incinerator	765
Multi-Material	Packaging/Camps	Incinerator/On-site landfill	547
Metal	Packaging	On-site landfill	328
Glass	Camps	On-site landfill	306
Wood	Packaging	Incinerator	219

NOTES

1. Composition based in part on 2011 Mary River Waste Audit results (Aug 27 - Aug 29). Assume 50% of waste generated to be domestic
2. Poly-chlorinated plastics will be sorted out of waste stream and sent to landfill and will not be incinerated

16. OTHER AUTHORIZATIONS

In addition to the sub-surface and surface land use authorizations provided in Block 6, are the same authorizations required as considered in the existing licence?

☒ Yes ☐ No

For each provide the following:

Authorization	Administering Agency	Project Activity	Date of Issuance	Date of Expiry
---------------	----------------------	------------------	------------------	----------------

The list of authorizations considered as part of the existing Licence is provided in Appendix C of the full renewal application and Supporting Information Document, dated June 26, 2024 and is also applicable to this Short Term Licence Renewal application.

17. PREDICTED ENVIRONMENTAL IMPACTS OF UNDERTAKING AND PROPOSED MITIGATION MEASURES

Are predicted environmental impacts of the undertaking and proposed mitigation measures the same as those considered in the existing water licence?

☒ Yes ☐ No

Describe direct, indirect, and cumulative impacts related to water and waste.

No changes are proposed to the Approved Project in this Short Term Licence Renewal application. Environmental impacts of the original Mary River Project Proposal and the Early Revenue Phase were assessed in detail in the 2012 Final Environmental Impact Statement and the 2013 Addendum to the FEIS for the Early Revenue Phase (Baffinland, 2012 and 2013). No changes were triggered to the Licence as a result of the PIP Amendments, which were assessed by NIRB and approved by Project Certificate amendments issued in 2008, 2020, 2022 and 2023 respectively.

18. WATER RIGHTS OF EXISTING AND OTHER WATER USERS

Are the effects of the undertaking on any known persons or property including those that hold licences for water use in precedence to the application, domestic users, in-stream users, authorized waste depositors, owners of property, occupiers of property, and/or holders of outfitting concessions, registered trapline holders, and holders of other rights of a similar nature, the same as those considered in the existing water licence?

☒ Yes ☐ No

Provide the names, addresses and nature of use for any known persons or properties that may be adversely affected by the proposed undertaking, including those that hold licences for water use in precedent to the application, domestic users, in-stream users, authorized waste depositors, owners of property, occupiers of property, and/or holders of outfitting concessions, registered trapline holders, and holders of other rights of a similar nature.

No changes to the original application are made in this Short Term Renewal application. There are no other known water licence holders or residents in the project area. Inuit hunters frequent the area, and a hunter cabin has been established outside the mine area and also at Milne Port.

Advise the Board if compensation has been paid and/or agreement(s) for compensation have been reached with any existing or other users.

A Water Compensation Agreement is in place for the Mary River Project between Baffinland and the Qikiqtani Inuit Association (dated May 3, 2013). As outlined in the Agreement, Baffinland has been paying a Consumptive Payment for Water Use in connection with the Project on an annual basis since 2014.

19. INUIT WATER RIGHTS

Are the effects of the undertaking on the quality, quantity or flow of waters flowing through Inuit Owned Land (IOL) the same as those considered in the existing water licence?

☒ Yes ☐ No

Advise the Board of any substantial affect of the quality, quantity or flow of waters flowing through Inuit Owned Land (IOL) and advise the Board if negotiations have commenced or an agreement to pay compensation for any loss or damage has been reached with one or more Designated Inuit Organization (DIO).

A Water Compensation Agreement is in place for the Mary River Project between Baffinland and the Qikiqtani Inuit Association (dated May 3, 2013).

20. CONSULTATION - Provide a summary of any consultation meetings including when the meetings were held, where and with whom. Include a list of concerns expressed and measures to address concerns.

Baffinland's recent consultation applicable to topics relevant to Licence renewal is presented in Section 4 of the full renewal application and Supporting Information Document dated June 26, 2024, and is also applicable to this Short Term Licence Renewal application.

21. SECURITY INFORMATION

Is the financial security assessment the same as that considered in the existing water licence?

☒ Yes ☐ No

Is the estimate of the total financial security for final reclamation the same as that considered in the existing water licence?

☒ Yes ☐ No

Provide an estimate of the total financial security for final reclamation equal to the total outstanding reclamation liability for land and water combined sufficient to cover the highest liability over the life of the undertaking. Estimates of reclamation costs must be based on the cost of having the necessary reclamation work done by a third party contractor if the operator defaults. The estimate must also include contingency factors appropriate to the particular work to be undertaken.

Where applicable, the financial security assessment should be prepared in a manner consistent with the principals respecting mine site reclamation and implementation found in the *Mine Site Reclamation Policy for Nunavut*, Indian and Northern Affairs Canada, 2002.

The amount of financial security currently posted is provided in the NWB's 2024 Annual Security Review Decision, attached to the original application dated June 26, 2024, and is still applicable to this Short Term Licence Renewal application.

22. FINANCIAL INFORMATION

Is the statement of financial security the same as that considered in the existing water licence?

☒ Yes ☐ No

Provide an updated statement of financial security.

See Box 21 for financial security information.

If the applicant is a business entity, please answer the questions below:

Is the list of the officers of the company the same as those considered in the existing water licence?

☐ Yes ☒ No

Provide a list of the officers of the company.

The current company officers are listed below.

Individual	Role/Title
Jowdat Waheed	President & Chief Executive Officer
Michael Anderson	Executive Vice President, Operations
Celeste van Tonder	Chief Financial Officer
Sajid Rizvi	Executive Vice President, Corporate Development & Capital Markets
Mark O'Brien	Executive Vice President & General Counsel
Megan Lord-Hoyle	Vice President, Sustainable Development
Udloriak Hanson	Vice President, Community & Strategic Development
Robin Nundoo	Vice President, Sales & Logistics

Is the Certificate of Incorporation or evidence of registration of the company name the same?

☒ Yes ☐ No

Attach a copy of the Certificate of Incorporation or evidence of registration of the company name.

Articles of Incorporation are presented in Appendix D of the full renewal application and Supporting Information Document dated June 26, 2024 and is also applicable to this Short Term Licence Renewal application.

23. STUDIES UNDERTAKEN TO DATE

List and attach updated studies, reports, research etc.

Refer to the 2012 FEIS and 2013 Addendum to the FEIS, as well as Aquatic Effects Monitoring Program (AEMP) annual reports and QIA/NWB annual reports for operations. The 2023 annual report for operations was submitted to the NWB on April 3, 2024.

Provide a compliance assessment and status report including a response to any inspector's reports. The licensee must contact the NWB for licence specific direction in completing the assessment and report.

If in non-compliance, a licence may not be issued until compliance is achieved. If in non-compliance, attach plans/reports for consideration. Application will not be processed if significant issues of non-compliance exist.

A summary of recent inspections and compliance status is provided in Section 6 and the most recent CIRNAC inspections and Baffinland's response are provided in Appendix H of the full renewal application and Supporting Information Document dated June 26, 2024 and is also applicable to this Short Term Licence Renewal application.

24. PROPOSED TIME SCHEDULE

Is the time schedule for all phases of development (construction, operations, closure and post closure) the same as that considered in the existing licence?

☐ Yes ☒ No

Indicate the proposed start and completion dates for each applicable phase of development (construction, operation, closure, and post closure).

The Mary River Project was constructed in 2013-14 and began operations in 2015. Construction of the Steensby Component will proceed once financing is in place.

Construction

Proposed Start Date: 2013
(month/year)

Proposed Completion Date: 2014
(month/year)

Operation

Proposed Start Date: 2015
(month/year)

Proposed Completion Date: 2037
(month/year)

Closure

Proposed Start Date: 2038
(month/year)

Proposed Completion Date: 2041
(month/year)

Post - Closure

Proposed Start Date: 2042
(month/year)

Proposed Completion Date: 2047
(month/year)

For each applicable phase of development indicate which season(s) activities occur.

Construction

☐ Winter ☐ Spring ☐ Summer ☐ Fall ☒ All season

Operation

☐ Winter ☐ Spring ☐ Summer ☐ Fall ☒ All season

Closure

☐ Winter ☐ Spring ☐ Summer ☐ Fall ☒ All season

Post - Closure

☐ Winter ☐ Spring ☐ Summer ☐ Fall ☒ All season

25. PROPOSED TERM OF LICENCE

On what date does the existing licence expire? **June 10, 2025**

Indicate the proposed term of the renewal (maximum of 25 years): **short term renewal 180 days**

Requested date of renewal issuance: **no later than June 10, 2025** Requested Expiry Date: **December 8, 2025****
(month/year) (month/year)

**** should the NWB issue a Short Term Water License Baffinland asks that the NWB include a contingency term that is clear that the Short Term Water Licence is only to come into effect in the event that the Renewal Licence is not issued by June 10, 2025. The Short Term Water Licence would only be in effect until the Renewal Licence is approved.**

(The requested date of renewal issuance must be at least three (3) months from the date of application for a type B water licence and at least one (1) year from the date of application for a type A water licence, to allow for processing of the water licence application. These timeframes are approximate and do not account for the time to complete any pre-licensing land use planning or development impact requirements, time for the applicant to prepare and submit a water licence application in accordance with any project specific guidelines issued by the NWB, or the time for the applicant to respond to requests for additional information. See the NWB's *Guide 5: Processing Water Licence Applications* for more information)

26. ANNUAL REPORTING

Is the annual report template expected to be the same as that considered in the existing licence?

☒ Yes ☐ No

If not using the NWB's Standardized Form for Annual Reporting, provide details regarding the content of annual reports and a proposed outline or template of the annual report.

Current annual report template:

Executive Summary (English, Inuktitut, and French)

Section 1 – Introduction

Section 2 – Project Activities, Modification and Infrastructure Changes

Section 3 – Mining and Exploration Activities

Section 4 – Water Use

Section 5 – Waste Management

Section 6 – Reported Incidents

Section 7 – Monitoring

Section 8 – Reclamation, Closure and Financial Security

Section 9 – Plans, Reports and Studies

Section 10 – Regulatory Inspections and Compliance

Section 11 – Amendments – Pending and Completed

Section 12 – Public Consultations

Section 13 – Summary of Project Plans for [upcoming year]

Section 14 – References

Appendices

A – Concordance Tables

B – NWB Annual Report Forms

C – As-Built and Infrastructure Monitoring Reports

D – Photo Journal

E – Other Supporting Documents

E.1 Waste Backhaul Report

E.2 Incinerator Ash Testing Results

E.3 SNP Hydrometric Monitoring Locations

E.4 Shipping Manifests

E.5 Management Plan Updates

E.6 Waste Rock Geochemistry Analytical Sampling Results

E.7 Quarry Geochemistry Analytical Sampling Results

E.8 Regulatory Correspondence

E.9 Aquatic Effects Monitoring Reports

E.10 Reclamation Research Studies

E.11 Groundwater Monitoring Reports

E.12 Response to Previous Year's Annual Report Comments

E.13 MDMER Annual Report

Other appendices or sub-appendices are added when appropriate

27. CHECKLIST

The following must be included with the application for renewal for the water licensing process to begin.

Completed Application for Water Licence Renewal form.

☒ Yes ☐ No If no, date expected _____

Updated plans, including designs and reports (see Block 23).

☒ Yes ☐ No If no, date expected _____

Current plans approved under the licence would continue to apply under the Short Term Renewal License.

Updated security assessment (see Block 21).

☒ Yes ☐ No If no, date expected _____

The NWB's 2024 ASR security decision is attached to the full renewal application dated June 26, 2024.

Updated financial statement (see Block 22).

☐ Yes ☒ No If no, date expected not applicable

Compliance Assessment / Status Report (see Block 23).

☒ Yes ☐ No If no, date expected _____

English Summary of Renewal Application.

☒ Yes ☐ No If no, date expected _____

See the cover letter to this Short Term Renewal application, which includes an executive summary of this application.

Inuktitut and/or Inuinnaqtun Summary of Renewal Application.

☒ Yes ☐ No If no, date expected _____

See the cover letter to this Short Term Renewal application, which includes an executive summary of this application.

Application fee of \$30.00 CDN (Payee Receiver General for Canada).

☐ Yes ☒ No If no, date expected to be provided separately to NWB

Water Use Fee Deposit of \$30.00 CDN (Payee Receiver General for Canada). The actual water use fee will be calculated by the NWB based upon the amount of water authorized for use in accordance with the Regulations at the time of issuance of the licence.

☐ Yes ☒ No If no, date expected not applicable

28. SIGNATURE

I, Elisabeth Luther (print name)

certify that the application requires no changes to water use or waste disposal as previously authorized and that the information given on this form is, to the best of my knowledge, correct and complete.

Signature

February 26, 2025
Date