



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*

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