Environmental Protection Operations (EPO) Prairie and Northern Region 5019 – 52nd St, P.O. Box 2310 Yellowknife, NT X1A 2P7

November 14, 2014

EC File: 6100 000 011/004 NWB File: 2AM-MRY1325

Via email: licensing@nunavutwaterboard.org

Phyllis Beaulieu, Manager of Licensing Nunavut Water Board PO Box 119 Gjoa Haven, NU X0B 1J0

RE: 2AM-MRY1325 - Baffinland Iron Mines Corporation. – Application for Amendment of Type 'A' Water Licence

Environment Canada has reviewed the above mentioned amendment application submitted by Baffinland and has the following comment.

In the application Baffinland has proposed an increase in the licence term from 12 to 25 years. Environment Canada is however, of the opinion that the current term (12 years) is appropriate as it will allow sufficient time for monitoring to inform the licence renewal process. Further, Environment Canada is in agreement with the reasoning presented in the NWB's June 2013 *Reasons for Decision* report which indicated that a term of 12 years provided a reasonable balance between investor interests and the uncertainties related to operational conditions and the lack of site specific data. Environment Canada therefore recommends that the existing term of 12 years remain unchanged.

With regard to the format of the TM and PHC: Environment Canada recommends that the TM and PHC be held either in writing or by teleconference.

Please do not hesitate to contact me at (204) 983 4815 or at mark.dahl@ec.gc.ca if you have any questions.

Sincerely,

Mark Dahl

EA and Marine Programs Division

cc: Loretta Ransom A/Head Environmental Assessment North (NT & NU), EPO EC Review Team

