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SOP 75% Sanikiluag January 21st, 2019

Karen Kharatyan **Director of Technical Services** Nunavut Water Board (NWB) P.O Box 119 Gioa Haven Nunavut X0B 1J0

Email: licensing@nwb-oen.ca

SENT VIA EMAIL

RE: "Phase 2 Proposal" Water Licence Application Completeness

On December 21, 2018, the Nunavut Water Board (NWB) requested parties confirm if they were "satisfied with the information and going to the next, full technical review stage" for Baffinland Iron Mines Corporation's (Baffinland) Mary River Phase II proposal (the Proposal). On January 7th, 2019, the Qikiqtani Inuit Association (QIA) submitted its views on the completeness of the application.2

On January 9th, 2019, the NWB responded to QIA's letter and encouraged "all parties to engage with each other directly to resolve issues, exchange required information and ensure that all parties have the information needed to participate fully in the applicable regulatory processes".3 Taking this suggestion into consideration parties held teleconferences on January 11th, 2019 and January 15th, 2019. Teleconferences included review of a presentation circulated by the proponent on January 15th, 2019⁴ and information requested by Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) on January 11th, 2019.5

Having reviewed the proponent's presentation, information requested by CIRNAC, and, the application filed before the NWB, QIA has not been swayed in its views that the application should proceed to the technical review at this time. As detailed in QIA's submission of January

¹ NWB EMAIL entitled, 2AM-MRY1325 Baffinland Iron Mines Corporation Information Requests Responses. December 21, 2018

² QIA Letter entitled, "Phase 2 Proposal" Water Licence Application Completeness. January 7th, 2019.

³ NWB letter entitled, Nunavut Water Board Follow Up to the QIA Comments Submission Regarding an Application by Baffinland Iron Mines Corporation for Amendments to Water Licence No: 2AM-MRY1325, associated with the Phase 2 Project Proposal for the Mary River Iron Mine. January 9th, 2019.

⁴ Baffinland presentation entitled: Mary River Project Phase 2 Proposal, Water Licencing Information Needs Baffinland Discussion with NWB. QIA and CIRNAC. January 15, 2019.

⁵ CIRNAC EMAIL entitled, RE: [EXTERNAL] Re: 2AM-MRY11325 NWB Follow-up QIA comment submission. January 11thm 2019.

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SOP 75% Sanikiluag 7th, 2019, QIA feels additional information, specifically the presentation of management plans, should be made available prior to the commencement of the technical review period.

In the event the NWB elects to initiate the technical review period prior to the presentation of information requested by review parties, QIA expects technical review comments will contain limited information and ultimately seek the same information as has already been requested. QIA feels such an approach would compromise the ability for parties to adequately respond to the application.

In closing, QIA thanks the NWB for the opportunity to engage in the review process and to speak directly on this application and the next steps in the review process.

Regards,

Mr. Jeremiah Groves QIA Executive Director