

Date: April 25/13Exhibit No.: 15

**Concordance of Baffinland  
Proposed Water Licence Terms and Conditions  
with NIRB Project Certificate Conditions**

<b>Project Certificate requirement</b>	<b>Proposed Terms and Conditions</b>
2 The Proponent shall provide the results of any new or revised assessments and studies done to validate and update climate change impact predictions for the Project and the effects of the Project on climate change in the Local Study Area and Regional Study Area as defined in the Proponent's Final Environmental Impact Statement.	Will be reported to NIRB, reported in Air Quality Management Plan (not relevant to water licence)
5 The Proponent shall endeavour to explore and implement reasonable measures to ensure that weather-related information for the various Project sites is readily accessible to the public on a continual basis throughout the life of the Project	Noted, to be reported to NIRB (not relevant to water licence)
11 The Proponent shall develop and implement an Incineration Management Plan that takes into consideration the recommendations provided in Environment Canada's Technical Document for Batch Waste Incineration (2010).	See Part F, Item 31
12 Prior to commencing any incineration of on-site Project wastes, the Proponent shall conduct at least one stack test immediately following the commissioning of each temporary and permanent incinerator.	See Part F, Item 33
13 The Proponent is encouraged to work with Fisheries and Oceans Canada at the regulatory phase and to take a precautionary approach when selecting the overpressure threshold to be applied to explosives use for the protection of fish and aquatic life.	Noted. To be addressed with Fisheries and Oceans Canada.
16 The Proponent shall ensure that the water related infrastructure or facilities that are designed and constructed, including the modification of culverts, diversion of watercourses, and diversion of runoff into watercourses along the railway, access roads, the Milne Tote Road, and other areas	Noted, addressed in Part D of Water Licence terms and conditions

<p>of the Project site, are consistent with those proposed in the FEIS in terms of type, location, and scope and that the requirements of all relevant regulatory authorities are satisfied advance of constructing those facilities.</p> <p><b>Commentary:</b> <i>It is understood that the term “consistent with those proposed in the FEIS” requires general consistency only in relation to the type, location and scope of this infrastructure and facilities, but does not limit the ability of the Proponent to refine and optimize the design, placement and construction as may become necessary to reflect site-specific conditions encountered during construction.</i></p>	
<p>17 The Proponent shall develop and implement effective measures to ensure that effluent from project-related facilities and/or activities, including sewage treatment plants, ore stockpiles, and mine pit, satisfies all discharge criteria requirement established by the relevant regulatory agencies prior to being discharged into the receiving environment.</p>	<p>Noted, addressed in Part E</p>
<p>18 The Proponent shall carry out continued analyses over time to confirm and update, accordingly, the approximate fill time for the mine pit lake identified in the FEIS.</p>	<p>See Part K, Item 10</p>
<p>19 The Proponent shall ensure that it develops and implements adequate monitoring and maintenance procedures to ensure that the culverts and other conduits that may be prone to blockage do not significantly hinder or alter the natural flow of water from areas associated with the proposed mine. In addition, the Proponent shall monitor, document and report the withdrawal rates for water removed and utilized for all domestic and industrial purposes.</p>	<p>Part D Item 34 Part E, Item 3</p>
<p>20 The Proponent shall monitor the effects of explosives residue and related by-products from project-related blasting activities as well as develop and implement effective preventative and/or mitigation measures, including treatment, if necessary, to ensure that the effects associated with the manufacturing, storage, transportation</p>	<p>Noted and addressed in Borrow Pit and Quarry Management plan (Described in Part D, Item 11)</p> <p>See also Part F, Item 52</p>

and use of explosives do not negatively impact the Project and surrounding areas.	
21 The Proponent shall ensure that the scope of the Aquatic Effects Monitoring Plan (AEMP) includes, at a minimum, monitoring of non-point sources of discharge, selection of appropriate reference sites, measures to ensure the collection of adequate baseline data and the mechanisms proposed to monitor and treat runoff, and sample sediments.	See AEMP
22 The Proponent shall develop a detailed Sediment and Erosion Management Plan to prevent and/or mitigate sediment loading into surface water within the Project area.	See Item 26, Part D
23 The Proponent shall develop and implement a Groundwater Monitoring and Management Plan to monitor, prevent and/or mitigate the potential effects of the Project on groundwater within the Project area.	See Part D, Item 16, addressed in Surface Water and Aquatic Ecosystem Management Plan
24 The Proponent shall monitor as required the relevant parameters of the effluent generated from Project activities and facilities and shall carry out treatment if necessary to ensure that discharge conditions are met at all times.	See Part F
25 The Proponent shall undertake the additional geotechnical investigations to identify sensitive landforms, modify engineering design for Project infrastructure, develop and implement preventative and/or mitigation and monitoring measures to minimize the impacts of the Project's activities and infrastructure on sensitive landforms.	Noted, part of design considerations.
26 The Proponent shall develop and implement a comprehensive erosion management plan to prevent or minimize the effects of destabilization and erosion that may occur due to the Project's construction and operation.	See Item 26, Part D
28 The Proponent shall monitor the effects of the Project on the permafrost along the railway and all other Project affected areas and must implement	Noted, part of design considerations.

effective preventative measures to ensure that the integrity of the permafrost is maintained.	
29 The Proponent shall provide to the respective regulatory authorities, for review and acceptance, for-construction engineering design and drawings, specifications and engineering analysis to support design in advance for constructing those facilities. Once project facilities are constructed, the Proponent shall provide copies of the as-built drawings and design to the appropriate regulatory authorities.	See Part D, Item 2 and Item 6-7
30 The Proponent shall develop site-specific quarry operation and management plans in advance of the development of any potential quarry site or borrow pit.	See Part B, Item 13 (which references the development of the Borrow Pit and Quarry Management Plan)
39 The Proponent shall develop a progressive revegetation program for disturbed areas that are no longer required for operations, such program to incorporate measures for the use of test plots, reseeding and replanting of native plants as necessary. It is further recommended that this program be directly associated with the management plans for erosion control established for the Project.	See Part K, Item 3 and 4. See also the Interim Abandonment and Reclamation Plan.
40 The Proponent shall include revegetation strategies in its Site Reclamation Plan that support progressive reclamation and that promote natural	See Part K, Item 3 and 4. See also the Interim Abandonment and Reclamation Plan.
41 Unless otherwise approved by regulatory authorities, the Proponent shall maintain a minimum 100-metre naturally-vegetated buffer between the high-water mark of any fish-bearing water bodies and any permanent quarries with potential for acid rock drainage or metal leaching.	Noted, addressed in Borrow Pit and Quarry Management Plan described in Part D Item 11
42 The Proponent shall maintain minimum a 30-metre naturally-vegetated buffer between the mining operation and adjacent water bodies.  <i><b>Commentary:</b> As used in this Item, "mining operation" is intended to include the site of active ore removal, including excavations resulting from the extraction of ore but does not include quarries,</i>	See Part D, Item 40

<i>transportation corridors or other mine infrastructure.</i>	
43 Prior to the start of construction, the Proponent must submit a Site Drainage and Silt Control Management Plan	See Part D, Item 36, which refers to submission of Site Drainage and Silt Control Management Plan
44 The Proponent shall meet or exceed the guidelines set by Fisheries and Oceans Canada for blasting thresholds and implement practical and effective measures to ensure that residue and by-products of blasting do not negatively affect fish and fish habitat.	See Part G, Item 9
45 The Proponent shall adhere to the No-Net-Loss principle at all phases of the project to prevent or mitigate direct or indirect fish and fish habitat losses.	Noted, and to be addressed with Fisheries and Oceans Canada
46 The Proponent shall ensure that runoff from fuel storage and maintenance facility areas, sewage and wastewater other facilities responsible for generating liquid effluent and runoff meet discharge requirements.	See Part F, Item 9, 20, 21, 40
47 The Proponent shall ensure that all Project infrastructure in watercourses are designed and constructed in such a manner that they do not unduly prevent and limit the movement of water in fish bearing streams and rivers.	See Part D, Items 24 to 34 (addressing stream and river crossings)
48 The Proponent shall engage with Fisheries and Oceans Canada and the Qikiqtani Inuit Association in exploring possible Project specific thresholds for blasting that would exceed the requirements of Fisheries and Oceans Canada's <i>Guidelines for the Use of Explosives In or Near Canadian Fisheries Waters</i> (D.G. Wright and G.E. Hopky, 1998).	Noted, this will be addressed with Fisheries and Oceans Canada
115 The Proponent is encouraged to continue to explore off-setting options in both the freshwater and marine environment to offset the Harmful Alteration, Disruption or Destruction of Fish and Fish Habitat (HADD).	Noted, this will be addressed with Fisheries and Oceans Canada
117 The Proponent shall ensure that blasting in, and near, marine water shall only occur during	Noted, this will be addressed with Fisheries and Oceans Canada

periods of open water. Blasting in, and near, fish-bearing freshwaters shall, to the greatest degree possible, only occur in open water. If blasting is required during ice-covered periods, it must meet requirements established by Fisheries and Oceans Canada.	
128 The Proponent shall consult with local communities as fish habitat off-setting options are being considered and demonstrate its incorporation of input received into the design of the Fish Habitat Off-Setting Plan required to offset the Harmful Alteration, Disruption or Destruction of Fish and Fish Habitat (HADD).	Noted, will be considered in accordance with DFO consultations as it relates to the marine environment