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Qikiqtani Inuit Association

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Serving the communities of

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February 28, 2025

Robert Hunter

Nunavut Water Board

PO Box 119

Gjoa Haven, NU X0B 1J0

Email: licensing@nwb-oen.ca

Subject: REVISED Status of QIA Technical Comments for Water Licence Renewal Application No: 2AM-MRY1325

Dear Robert,

Due to some very recent developments, the Qikiqtani Inuit Association (QIA) provides this correspondence to the Nunavut Water Board (the NWB or the Board) as a revision to QIA's final written submission regarding Baffinland Iron Mines Corporation's (Baffinland or the Applicant) Renewal Application for Water Licence No: 2AM-MRY1325 (the Application) (the Licence).¹

In its February 7, 2025 submission, QIA advised the Board that QIA came to an agreement with the Applicant to recommend the inclusion into the renewed water licence of a commitment by Baffinland and proposed wording for Part B, Item 17 and Schedule B, Item 1, thereby resolving a number of QIA technical comments concerning the integration of Inuit Qaujimajatuqangit and Inuit Qaujimaningit (collectively, IQ) into the water licence. QIA had clearly relayed to the Applicant that the intent behind this agreement was that the results of the studies conducted under the Inuit Stewardship Program (ISP) were to inform the Applicant's management, monitoring and mitigation plans. Therefore, obtaining the Applicant's assurances on following the agreed terms, QIA developed a position that was founded on the understanding that funding for the ISP was secured.

Unfortunately, on February 21, 2025, Baffinland notified QIA that it would not be providing funding for the ISP. QIA and Baffinland had previously engaged in numerous talks toward finalizing agreement on short- and long-term funding for the ISP, with good progress and optimism. As the resolution of the technical comments relating to IQ was directly dependent on integrating ISP studies' outcomes, QIA no longer has confidence that IQ and data from community-based studies will be properly integrated in the

¹ Assol Kubeisinoᖃ (QIA) to Robert Hunter (NWB), Re: QIA Final Submission for Water Licence Renewal Application No: 2A-MRY1325, dated February 7, 2025.



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Project's activities. Therefore, fulfilling its role as a Designated Inuit Organization, QIA reverts the status of Technical Comments QIA-TR-24 and QIA-TR-27 to -37 to "unresolved".

As a result, QIA presents Table 1 that includes technical comment status as of the date of this correspondence. The Table shows that the number of unresolved comments increased from **11** to **23**.

In consideration of the above, QIA will be re-evaluating its position on whether to support the renewal of this Licence.

QIA remains committed to working with the Applicant and appropriate parties to seek resolution on all remaining technical issues.

QIA would like to thank the NWB for the continued opportunity to participate in the review of this Application. Please do not hesitate to contact QIA for any clarification.

Nakurmiik,

Assol Kubeisinova

Manager of Regulatory Review

Qikiqtani Inuit Association

Attachments: Table 1 QIA Technical Comments Status



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Table 1 QIA Technical Comments Status

QIA Technical Comment No.	Status on February 7, 2025	Current Status
Total: 38 comments	Resolved: 27 Unresolved: 11	Resolved: 15 Unresolved: 23
QIA-TR-1	Unresolved	Unresolved
QIA-TR-2	Unresolved	Unresolved
QIA-TR-3	Resolved	Resolved
QIA-TR-4	Resolved	Resolved
QIA-TR-5	Unresolved	Unresolved
QIA-TR-6	Unresolved	Unresolved
QIA-TR-7	Unresolved	Unresolved
QIA-TR-8	Resolved	Resolved
QIA-TR-9	Unresolved	Unresolved
QIA-TR-10	Resolved	Resolved
QIA-TR-11	Unresolved	Unresolved
QIA-TR-12	Resolved	Resolved
QIA-TR-13	Resolved	Resolved
QIA-TR-14	Unresolved	Unresolved
QIA-TR-15	Unresolved	Unresolved
QIA-TR-16	Unresolved	Unresolved
QIA-TR-17	Unresolved	Unresolved
QIA-TR-18	Resolved	Resolved
QIA-TR-19	Resolved	Resolved
QIA-TR-20	Resolved	Resolved
QIA-TR-21	Resolved	Resolved
QIA-TR-22	Resolved	Resolved
QIA-TR-23	Resolved	Resolved



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