

- *modify the Trigger, Action and Response Plan (Table 5-1) to address inconsistencies, including:*
 - *removing the condition relating to fish health or benthic invertebrate community endpoints in the medium risk threshold for fish muscle tissue mercury concentrations and amend the low risk threshold;*
 - *amend the selenium threshold to use criteria for the same fish tissue type for the low and medium risk thresholds for fish tissue selenium concentrations and define the acronym PNEC in any narratives;*
 - *applying the low risk threshold for sedimentation to all measurement stations;*
 - *including the development of high risk thresholds in the response to medium risk responses for MDMER fish tissue studies for mercury and selenium; and*
 - *correct references to tables for water and sediment quality benchmarks.*

QIA in their submission of February 20, 2026, provided the following recommendations regarding trigger, action and response plan:

- *clarify the purpose of including this additional indicator for the medium risk response threshold for mercury concentration in fish tissue; and*
- *clarify the purpose of revising the mercury threshold value from 0.2 µg/g to 0.5 µg/g.*

On March 3, 2026, Baffinland provided their response and additional information to parties' comments and recommendations. Specifically in response to ECCC's recommendations, Baffinland's response¹ indicated agreements to most of the recommendations, and noted that Version 3 of the AEMP will be updated accordingly to reflect these recommendations.

The NWB requested parties to confirm by March 18, 2026, whether they were satisfied with Baffinland's response. ECCC noted on March 17, 2026, regarding the threshold for mercury in fish *that the medium risk threshold for fish muscle tissue mercury concentrations remains unchanged and should not include conditions relating to fish health or benthic community endpoints.* CIRNAC advised on March 18, 2026, they have no further comments at this time.

Copies of all documents and submissions received during the review of the updated AEMP can be accessed through the NWB's Public Registry site using the following Link:

[AEMP Revision 3](#)

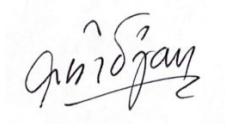
By way of this correspondence and as per Part B, Item 15 of the Licence, the Board finds the updated *Aquatic Effects Monitoring Plan, Revision 3*, dated January 9, 2026, submitted by Baffinland acceptable provided the updates are made as committed in their response to parties' comments and recommendations dated March 3, 2026.

The Board advises the Licensee to submit to the Board, at the earliest, the final updated *Aquatic Effects Monitoring Plan, Revision 3* once the required updates are made. Once updated and submitted for information, the Plan could be implemented immediately.

¹ Baffinland's response to parties' comments and recommendations dated March 3, 2026

Should you have any questions regarding the above, please contact the NWB Licensing Department by email to licensing@nwb-oen.ca or by phone at (867) 360-6338.

Sincerely,

A handwritten signature in black ink, appearing to read 'Abid Jan', with a stylized flourish at the end.

Abid Jan
Technical Advisor
Nunavut Water Board

aj/rh

Cc: Distribution List – Mary River