

February 24, 2026

Robert Hunter
Licencing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU X0B 1J0

Re: 2AM-MRY2540 – Baffinland Iron Mines – Mary River Project – Responses to Comments on Baffinland's Surface Water Aquatic Ecosystem Management Plan

The following submission from Baffinland Iron Mines Corporation (Baffinland) is in response to the technical comments submitted by Environment and Climate Change Canada (ECCC) on documents submitted in line with Part B, Item 15 of Baffinland's latest Type 'A' Water Licence, specifically the Surface Water and Aquatic Ecosystem Management Plan (BIM-5200-PLA-0009; Revision 8). These comments were distributed by the Nunavut Water Board (NWB) on February 11, 2026.

Should you have any additional concerns or questions regarding the attached responses, please do not hesitate to contact the undersigned at your convenience.

Regards,



Elisabeth Luther
Senior Manager, Regulatory Affairs

Cc: William Bowden, Todd Swenson, Laurence Serra

Attachments

Table 1. Response to Comments on the Surface Water and Aquatic Ecosystem Management Plan

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Reviewer’s Detailed Comment	ECCC Recommendation	Reference	Baffinland’s Response
<p>The Tote Road Monitoring Program (TRMP) includes elements related to monitoring water and protecting its quality. Their incorporation into the Surface Water and Aquatic Ecosystem Management Plan (SWAEMP) was discussed in the recent water licence renewal proceedings and is summarized in the Reason for Decision: <i>“Baffinland stated that SWAEMP will be updated with relevant aspects of the Tote Road Monitoring Program and hence it is not necessary to include it as an annex or stand-alone plan. The Board agrees with Baffinland’s position and requires the Licensee to update the SWAEMP with relevant aspects of the Tote Road Monitoring Program within 6 months of the approval of the Renewed Water Licence.”</i></p> <p>The SWAEMP has been updated to include the list of analytical parameters to be measured in water samples taken along the Tote Road as well as the list of culverts and bridges monitored along the road. However, other relevant aspects of the monitoring program such as the criteria used to evaluate water quality results and the action response framework were not included in the SWAEMP. Version 8 of the SWAEMP continues to state: <i>“For additional details on the TRMP’s sampling frequency, monitored parameters and response action frameworks and action levels refer to the Project’s Roads Management Plan BIM-5200-PLA-0027.”</i></p> <p>The water quality criteria and action response framework set out measures to protect waters along the Tote Road and should be incorporated into plans and programs reviewed and covered under the water licence. The Roads Management Plan, in which the information is currently housed, is not part of the water licence.</p>	<p>ECCC recommends the Proponent modify the Surface Water and Aquatic Ecosystem Management Plan (or another plan or program under the water licence) to include water quality criteria used to trigger actions, as well as the action response framework, for monitoring along the Tote Road.</p>	<p>1. Surface Water and Aquatic Ecosystem Management Plan (BIM-5200-PLA-0009) Revision 8 (Baffinland Iron Mines Corporation; January 8, 2026)</p> <ul style="list-style-type: none"> - Section 9.4.2.3: Tote Road Monitoring Program - Table 9-4: Tote Road Monitoring Program – Analytical Parameters - Appendix C.1: List of sites evaluated and assessed in freshwater watercourses along the Tote Road <p>2. Water Licence No: 2AM-MRY2540, Reasons for Decision including Record of Proceedings (Nunavut Water Board; April 28, 2025) Part B: General Conditions</p>	<p>Baffinland will revise the SWAEMP to include the water quality evaluation criteria/decision rules used under the Tote Road Monitoring Program (TRMP), along with a summary of the TRMP action levels and the associated action-response framework. This update is intended to make the SWAEMP self-contained for review under the Water Licence suite while maintaining alignment with the TRMP’s primary purpose under the Project Certificate.</p> <p>Importantly, the TRMP action levels will be clearly described as internal adaptive-management triggers used to initiate investigation, inspections, maintenance, corrective actions, and follow-up monitoring, and not as effluent limits or automatic indicators of non-compliance.</p> <p>Detailed implementation procedures (sampling logistics, inspection forms, work execution processes, and roles/responsibilities) will continue to be maintained in the Roads Management Plan as the SOP-level document.</p> <p>The updated SWAEMP with the above inclusion will be submitted with the 2025 QIA-NWB Annual Report for Operations on March 31, 2026.</p>