

Environmental Protection Operations Directorate
Prairie & Northern Region
5019 52nd Street, 4th Floor
P.O. Box 2310
Yellowknife, NT X1A 2P7

ECCC File: 6100 000 011/010
NIRB File: 2AM-MRY2540



March 3rd, 2026

via email at: licensing@nwb-oen.ca

Robert Hunter
Nunavut Water Board
29 Mitik Street
P.O. Box 1360
Cambridge Bay, NU X0B 0C0

Dear Robert Hunter:

RE: 2AM-MRY2540 – Baffinland – Mary River – Follow-up on responses to Surface Water and Aquatic Ecosystem Management Plan (SWAEMP)

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board (NWB) regarding the above mentioned SWAEMP.

ECCC provides expert information and knowledge to project assessments on subjects within the department's mandate and within federal jurisdiction, including greenhouse gas emissions and climate change, air quality, water quality and quantity, migratory birds, species at risk, environmental emergencies preparedness and response, and climate and meteorology. This work includes reviewing proponent's characterization of environmental effects and proposed mitigation measures, and providing information and knowledge to decision-makers on activities needed to mitigate these environmental effects within federal jurisdiction. Any comments received from ECCC in this context does not relieve the proponent of its obligations to respect all applicable federal legislation.

The following comments are provided:

1. Future update to the Surface Water and Aquatic Ecosystem Management Plan

Reference(s)

- Responses to Comments on Baffinland's Surface Water Aquatic Ecosystem Management Plan (Baffinland; February 24, 2026)

Comment

The Proponent's responses to ECCC's comments on the Surface Water Aquatic Ecosystem Management Plan V8 are to defer updates to the Plan until March 31, 2026. They also



specify that the water quality criteria for monitoring at culverts and bridges along the Tote Road will be: *“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.”*

ECCC notes that the purpose of the water quality criteria and response framework is to allow for early identification of potential issues and timely implementation of adaptive management to prevent exceedances of water quality guidelines. For watercourse crossings along the Tote Road, management actions should be implemented to identify and respond to potential effects to water quality and aquatic life.

ECCC Recommendation(s)

ECCC recommends the Proponent update the Surface Water Aquatic Ecosystem Management Plan pertaining to watercourse crossings along the Tote Road with water quality criteria and a response action framework that will prevent impacts to water quality. The update should be done in time for implementation during the 2026 open water season.

If you need more information, please contact Kelvin Mok at 647-951-8836 or Kelvin.Mok@ec.gc.ca

Sincerely,

Kelvin Mok
Environmental Assessment Officer

cc: Eva Walker, Head, Environmental Assessment North (NT and NU)