



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
918 Nunavut Drive
Iqaluit, NU, X0A 3H0

Your file - Votre référence
2AM-MRY2540
Our file - Notre référence
GCDocs# 141037978

October 24, 2025

Robert Hunter
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
Sent via E-mail: licensing@nwb-oen.ca

Re: Crown-Indigenous Relations and Northern Affairs Canada's reply to Baffinland Iron Mine Corporation's 2024 Annual Report Responses for Type A Water License 2AM-MRY2540 for the Mary River Project

Dear Mr. Hunter,

Thank you for your correspondence dated October 3, 2025, inviting Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) to review Baffinland's responses to the 2024 Annual Report for Type A Water Licence 2AM-MRY2540, pertaining to the Mary River Project.

CIRNAC has reviewed the submission in accordance with its responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Crown-Indigenous Relations and Northern Affairs Act*. Upon review, CIRNAC has determined that Baffinland has not adequately addressed several of its recommendations—specifically R-01, R-26, and R-27. Although Baffinland committed to providing responses to these items by October 15, 2025, they remain outstanding.

Additionally, a number of other recommendations (R-03, R-05, R-06, R-07, R-08, R-09, R-11, R-14, R-15, R-17, R-19, R-20, R-21, R-22, R-23, R-24, R-25) have been deferred to the 2025 Annual Report. As such, these items remain unresolved pending further updates. CIRNAC considers this approach insufficient to meet the requirements of its water licence and the continued deferral of responses will be deemed to be non-compliant in future assessments.

For the remaining recommendations, Baffinland has provided partial information which CIRNAC will review in due course. However, given the lack of comprehensive responses and the pattern of deferrals, CIRNAC has no further comments at this time.

CIRNAC expects that the 2025 Annual Report will include detailed responses to all outstanding recommendations, either integrated within the main body of the report or clearly outlined in a dedicated subsection, rather than presented solely in tabular format.

If there are any questions or concerns, please contact Lauren Perrin at lauren.perrin@rcaanc-cirnac.gc.ca or Andrew Keim at Andrew.keim@rcaanc-cirnac.gc.ca

Sincerely,

Lauren Perrin,
Water Management Specialist