

APPENDIX E.13.1

Responses to Intervenor Comments on the 2024 QIA-NWB Annual Report for Operations

Mary River Project**Water Licence No. 2AM-MRY2540****Prepared by: Baffinland Iron Mines Corporation****Submitted to: Nunavut Water Board****Date: March 31, 2026**

This appendix provides Baffinland Iron Mines Corporation's detailed responses to unresolved, not adequately addressed, and outstanding intervenor comments identified by the Nunavut Water Board in its November 19, 2025 technical review of the 2024 Annual Report for the Mary River Project, including comments from Qikiqtani Inuit Association (QIA), Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC), and Environment and Climate Change Canada (ECCC) that the NWB directed be addressed by March 31, 2026 as part of the 2025 Annual Report.

This appendix also responds to CIRNAC's request that outstanding recommendations be addressed in a format that is integrated within the main body of the report or clearly outlined in a dedicated subsection, rather than presented solely in tabular format. Appendix E.13.1B has been created specifically to address this request.

This appendix includes:

- Baffinland's detailed responses to the unresolved and outstanding comments identified by the NWB (Appendix E.13.1) with:
 - Appended supporting narrative, figures, tables, and technical discussion, as applicable; and
 - Copies of relevant supporting documents appended for ease of reference, including the NWB's November 19, 2025 letter setting out the official list of comments requiring response.

Attachments:**Appendix E.13.1 – Baffinland Response to Intervenor Comments**

Appendix E.13.1A – Baffinland's October 15 Response to CIRNAC R-01

Appendix E.13.1B – Dedicated subsection response to CIRNAC's request

Appendix E.13.1C – July 2025 WRF Thermistor Monitoring Results

Appendix E.13.1D – As-Built Report for 2024 KM110 Geotube Pond Liner Replacement

Appendix E.13.1E – 2024 Q4 WRF QA/QC Compliance Report

Appendix E.13.1F – WSP – 2025 Q4\$ WRF Assessment

Appendix E.13.1G - NWB November 19, 2025 letter

Table A.1: Response to QIA Comments on Baffinland’s 2024 QIA-NWB Annual Report for Operations

No.	Intervener Cmt. No.	Intervener Comment	Intervener Recommendation	Baffinland’s Response
7	GGC#7	Baffinland notes improvements in their QA/QC program, with a reduction in the number of parameters exceeding their respective analyte Lowest Detection Limit (LDLs) in field and trip blanks from 2023 (46 parameters) to 2024 (32 parameters). They further state that 6.8% of trip blank results (16 out of 236) and 14.3% of field blank results (16 out of 112) exceeded the Data Quality Objectives of less than the LDL, and conclude that this indicates negligible contamination and acceptable field precision and accuracy. The basis for considering 6.8% and 14.3% of results exceeding the LDL as negligible and acceptable needs to be clarified. Is there a reference or guideline that supports these thresholds? To determine the main source of contamination in BIM’s QA/QC program, an assessment of their distilled water was conducted in 2024. Baffinland concluded that analyte detections above the LDL in blanks were likely due to contamination from equipment, workspace, or sampling procedures during blank preparation or fieldwork. In response, Baffinland has implemented increased training and awareness sessions, improved cleaning and storage of sampling containers, and enhanced workspace cleanliness when preparing blanks. It is important to note that the QA/QC program is intended to identify potential sources of contamination in field-collected samples. When contamination is detected, it may call into question the validity of field sample results.	1. Provide a basis for considering 6.8% and 14.3% of results exceeding the LDL as negligible contamination and it is acceptable. 2. Provide a reference of guideline that supports these thresholds. 3. Confirm that corrective actions implemented for the QA/QC program are also being applied consistently across all aspects of the field sampling program.	1) Basis for considering the reported blank detections to represent negligible contamination As set out in the Project’s Surface Water Sampling Program – Quality Assurance and Quality Control Plan (BIM-5200-PLA-0004), the preferred data quality objective for field and trip blanks is that analytes be non-detectable. However, blank results are not interpreted solely on the basis of whether a result marginally exceeds the laboratory lowest detection limit (LDL). Rather, significance is assessed based on the magnitude of the detection relative to the LDL. Under the Project QA/QC Plan, blank detections greater than the LDL but less than or equal to five times the LDL are interpreted as low-level detections near the practical limit of analytical sensitivity, whereas blank detections greater than five times the LDL are considered significant and investigated. In this context, the reported values of 6.8% for trip blanks and 14.3% for field blanks were <u>not acceptance thresholds</u>; they were simply the proportion of blank analyte results exceeding the ideal objective of “less than the LDL.” Only three blank results in 2024 exceeded the Project’s significance criterion of greater than five times the LDL, <u>representing approximately 1% of all blank results</u>, and those results were investigated accordingly. 2) Reference or guideline supporting the Project’s approach Baffinland is not aware of a single national Canadian guideline that prescribes a universal percentage threshold for the proportion of field or trip blank results that may exceed the LDL while still being considered acceptable. Rather, the Canadian guidance reviewed for this response supports establishing project-specific data quality objectives or measurement quality objectives in the applicable QA/QC plan, and then assessing performance against those objectives. The British Columbia Field Sampling Manual, for example, gives as a data quality objective a maximum acceptable concentration of reportable analytes in an equipment blank of five times the reportable detection limit. Agriculture and Agri-Food Canada likewise presents “less than 5% of field blanks show contamination” as an example MQO, rather than as a universal national standard. CCME and ECCC guidance similarly frame blanks as QA/QC tools used to identify potential contamination and to trigger evaluation and corrective action where data quality objectives are not achieved. 3) Confirmation that corrective actions are being applied across the field sampling program Baffinland confirms that the corrective actions arising from the 2024 blank contamination review are being applied consistently across all aspects of the field sampling program. These actions include increased training and awareness for field personnel, improved cleaning and storage of sample containers and associated sampling equipment, and enhanced workspace cleanliness during blank preparation and sample handling. In addition, for monitoring programs with particularly low detection limits and stringent guideline benchmarks, Baffinland has implemented direct shipment of laboratory-supplied ultrapure/deionized water from ALS southern facilities for use in blank preparation, in order to reduce on-site handling and the potential for contamination associated with preparation under site laboratory conditions. ALS internal SOP

No.	Intervener Cmt. No.	Intervener Comment	Intervener Recommendation	Baffinland's Response
				confirms that this supplied ultrapure DI water is regularly tested to ensure it meets a standard of 18.2 MΩ·cm at 25°C. Blank results continue to be reviewed against the Project QA/QC Plan data quality objectives, and follow-up investigation and corrective action are implemented where warranted. This is consistent with Canadian QA/QC guidance, which emphasizes establishing DQOs in advance, checking performance against those DQOs, and taking remedial action when those objectives are not met. Reference note: Relevant guidance includes BIM-5200-PLA-0004, the <i>British Columbia Field Sampling Manual – Part E1: Surface Water</i>, CCME's <i>Protocols Manual for Water Quality Sampling in Canada</i>, Agriculture and Agri-Food Canada guidance on QA/QC and MQOs, and ECCC's <i>Metal Mining Technical Guidance for Environmental Effects Monitoring</i>. Baffinland considers this item (QIA-GGC#7) closed.
8	GGC#8	In September 2024, unusually heavy rainfall caused heavy runoff, with erosion that elevated sediment concentrations in the water, and overland flooding that caused extensive damaged to the Tote Road and six (6) stream crossings, including a complete culvert washout at the km 63.5 stream crossing (Main Doc., s.7.3, p. 48; App. C.1.2, p. 5). Spill reports filed on the sediment-laden water detailed the damage, and the erosion and sediment controls implemented to protect water quality (Table 6.2, p. 37 and 38; App. E.8.3 Parts 2 and 3 of 3). The road was closed to all traffic for nine days and required significant emergency repairs. This extreme weather was described variously as an "<i>unprecedented 1:1000 rainfall event</i>" (Main Doc. s.7.3, p. 45) and "<i>greater than a 1000-year return period 24-hour rainfall event</i>" (p. 54), based on the Mary River Mine site rainfall records between 2013 and 2023 (App. E.8.2, Part 1, p. 57 and Part 2, p. 92). The frequency of extreme weather events in northern Canada is expected to increase in response to ongoing climate change (e.g., Zhang et al. 2019). Given the impact of this rainfall event, it is important to understand the level of certainty attached to its predicted 1,000-year return period, which suggests a 0.1% probability of recurrence in any given year. Was the prediction based simply on a decade of local rainfall records, or were longer term regional rainfall records and patterns such as the Arctic Oscillation also considered?	QIA requests Baffinland clarify: 1) how the 1,000-year return period this rainfall event was estimated, 2) the level of uncertainty associated with this estimate, and 3) how the potential for climate change to cause such events on a greater frequency is being factored into stream crossing remediation and design, and erosion and sediment control preparedness?	1) Clarification of how the 1,000-year return period was estimated Baffinland retained third-party hydrologists to evaluate the magnitude of the September 2024 rainfall event using statistical frequency analysis of regional and site-specific precipitation records. A frequency analysis was first completed using the longer-term Pond Inlet precipitation record (1975–2023), and Project-specific rainfall data from the Mary River Mine and Milne Port weather stations (2013–2024) were then used to provide additional site-level context for the observed event across the Project area. Using standard extreme value statistical methods, the hydrologists concluded that the September 2024 rainfall event exceeded the modelled 1:1000-year 24-hour rainfall event. The purpose of the assessment was to characterize the severity of the event and provide context for the scale of Project-related impacts observed, including washouts of sections of the Tote Road, emergency repairs, and temporary disruption to site and port operations. 2) Clarification of the level of uncertainty associated with the estimate As with any statistical analysis of rare extreme events, there is uncertainty associated with assigning a precise return period to the September 2024 rainfall event, particularly at the upper end of a frequency distribution. However, the estimate was not based solely on the relatively short period of Project-specific rainfall monitoring. Rather, it was informed by a longer-term regional precipitation record from Pond Inlet (1975–2023), which provides a broader basis for characterizing extreme rainfall frequency, together with Project-specific rainfall records from Mary River Mine and Milne Port (2013–2024), which confirmed the exceptional magnitude of the event at the Project. Accordingly, while uncertainty remains in assigning a precise recurrence interval to an event of this magnitude, the use of the longer-term regional dataset provides greater confidence that the September 2024 rainfall event was exceptionally rare and well beyond the magnitude of rainfall events typically considered in routine design reference. The estimated return period should therefore be understood as a reasonable characterization of the event's extreme severity and rarity, rather than as a precise prediction of how often such an event will recur at a specific location.

No.	Intervener Cmt. No.	Intervener Comment	Intervener Recommendation	Baffinland's Response
				3) Clarification of how climate change is being factored into remediation, design, and preparedness Baffinland recognizes that climate change has the potential to influence the frequency and magnitude of extreme precipitation events over time. Consistent with current Canadian engineering and climate guidance, Baffinland is addressing this through a risk-based and adaptive approach rather than by revising project-wide design criteria solely on the basis of a single event in isolation. In practical terms, the September 2024 rainfall event is being considered as an important line of evidence in ongoing review of stream crossing remediation, hydraulic performance, erosion protection, and operational preparedness. This includes consideration of lessons learned in the prioritization of vulnerable crossings, review of drainage capacity and erosion/scour protection, inspection and maintenance practices, and contingency planning for future extreme weather events. With respect to erosion and sediment control preparedness, Baffinland's approach is also consistent with current guidance emphasizing adaptive management, reassessment of control measures where conditions or performance warrant, and strengthening of erosion prevention and drainage controls as appropriate. In support of this approach, Baffinland delivered Canadian Certified Inspector of Erosion and Sediment Controls (CAN-CISEC) facilitated training to relevant staff responsible for erosion and sediment control implementation, as a proactive measure to strengthen inspection capacity, field application, and preparedness for extreme weather-related erosion and runoff risks. Baffinland does not consider it appropriate to revise project-wide engineering design criteria solely on the basis of a single event in isolation. Rather, design and remediation improvements will continue to be informed through a weight-of-evidence approach that considers site performance observations, lessons learned from extreme events, applicable engineering standards, regulatory requirements, and the best available hydrologic and climate information. In this way, Baffinland is incorporating climate considerations through continuous improvement of remediation, monitoring, training, and preparedness measures while maintaining alignment with industry-standard engineering practice. Reference note: Supporting context includes Engineers Canada's <i>Public Guideline: Principles of Climate Adaptation and Mitigation for Engineers</i>, Housing, Infrastructure and Communities Canada's <i>Codes, standards and guidance for climate resilience</i>, and Fisheries and Oceans Canada's <i>Planning for land-based erosion and sediment control</i>. These sources support integration of climate considerations through risk-based assessment, adaptive management, and progressive refinement of design, remediation, and preparedness measures. Baffinland considers this item (QIA-GGC#8) closed.
25	AE#9	Chlorophyll-a concentrations at Sheardown Lake NW in 2024 results are reported from winter, summer and fall sampling events. No results are reported from spring sampling.	QIA requests the absence of spring sampling results be explained.	As Sent October 2: The sampling frequency for Sheardown Lake Northwest (NW) in 2024 is consistent with the sampling frequency specified in the Aquatic Effects Monitoring Plan (AEMP) Rev 1 study design (Baffinland 2015) and with annual sampling that has been conducted since 2014. Lake sample locations are unsafe to access during spring conditions as the ice on the lake is unstable. References:

No.	Intervener Cmt. No.	Intervener Comment	Intervener Recommendation	Baffinland's Response
				Baffinland. 2015. Aquatic Effects Monitoring Plan BAF-PH1-830-P16-0039. Rev 1. October 30, 2015. Baffinland. 2024. Aquatic Effects Monitoring Plan BIM-5200-PLA-0023. Rev 2. March 31, 2024. Baffinland considers this item (QIA-AE#9) closed.
30	AE#14	In 2023 (CREMP 2023, p. 269) and again in 2024 (CREMP 2024, p. iii) the CREMP found elevated nitrogen-related compounds (ammonia, nitrate, nitrite, and total Kjeldahl nitrogen) in Sheardown Lake tributary 9 (SDLT9), and in 2024 elevated nitrate in both Sheardown Lakes (Northwest [NW] and Southeast [SE]). A special investigation completed in the fall of 2024 identified activities at the Dyno Nobel Emulsion Plant (Dyno facility), which stores ammonium nitrate for explosives production and is adjacent to SLDT9, as the primary source of these compounds (CREMP 2024 App. I, p. I-3 (p. 272 of 276). Baffinland plans to implement an activity audit of the transportation, storage, and handling of ammonium nitrate at the Dyno facility, with potential additional water sampling during the open water season in 2025, to help identify point source(s) of aqueous nitrogen compounds. Has Baffinland considered air quality monitoring for nitrogen compounds in the vicinity of the Dyno facility and mine pit to better understand their magnitude and dispersal?	QIA recommends: 1) that the additional sampling conducted during the 2024 special investigation of nitrogen-related compounds in Sheardown Lake tributary 9 (SLDT9) be continued in 2025, along with any other new stations needed to assess the efficacy of measures taken to reduce fugitive nitrogen compounds, and 2) that Baffinland consider the value of monitoring airborne dispersal of nitrogen compounds in the vicinity of the Dyno facility and mine pit.	1) Continued investigation and follow-up sampling As described in the 2025 CREMP, Baffinland continued the special investigation in 2025 through targeted water quality assessment in SDLT9 and Sheardown Lake SE to further evaluate the influence of inputs associated with the Dyno facility area. Although the 2025 dataset was not sufficient to support formal statistical comparison among stations, the combined results from SDLT9, Sheardown Lake SE, and follow-up field investigations provided sufficient lines of evidence to identify the Dyno facility area as the likely source of the elevated nitrogen compounds and to inform corrective actions. More specifically, two rounds of targeted water quality investigations were completed in August 2025 at 10 locations proximal to SDLT9, together with concurrent sampling of ash from the nearby Dyno facility ash bin. Based on those investigations, the ash bin was identified as the most likely source of the elevated ammonia concentrations. This interpretation is consistent with mine nitrogen management guidance, which recognizes that nitrogen-related effects on water quality commonly arise from localized releases associated with explosives handling, residues, and runoff or leaching of water-soluble ammonium nitrate-based materials. By way of context, certain explosives-related outer packaging and associated solid residuals have historically been managed by controlled burning in remote northern operations. Natural Resources Canada's Explosives Regulatory Division advised that explosive outer packaging must be destroyed or disposed of so it cannot be reused, and noted that open-air burning had been the long-accepted method for destruction of such packaging where no safe and environmentally sound alternative was available. These reference is provided as context for historical waste management practices only, and do not alter Baffinland's investigation finding that the likely pathway affecting SDLT9 was localized contact of runoff and/or snowmelt with ash containing trace emulsion residues in the Dyno facility area. Corrective actions have since been implemented. In February 2026, the ash bin was removed and relocated to its permanent location in the Waste Rock Facility, and snow potentially affected by windblown ash was also removed from the area and transferred to the Waste Rock Facility. Follow-up water quality investigations will continue in the SDLT9 drainage in 2026, including stations proximal to the former source area and any additional stations warranted by the results, to confirm whether ammonia and other nitrogen compounds have returned to expected levels and to assess the effectiveness of the corrective measures. 2) Consideration of airborne monitoring Baffinland has considered the potential value of monitoring airborne nitrogen compounds in the vicinity of the Dyno facility. Based on the investigations completed to date, however, airborne dispersal is not currently considered the most likely primary pathway responsible for the elevated nitrogen compounds observed in SDLT9. The available lines of evidence instead indicate a localized source associated with trace

No.	Intervener Cmt. No.	Intervener Comment	Intervener Recommendation	Baffinland's Response
				emulsion materials in ash and affected snow near the Dyno facility, followed by runoff to the tributary. This interpretation is also consistent with mine nitrogen management guidance, which emphasizes runoff, leaching, and localized handling or residue losses as key mechanisms by which explosives-related nitrogen can affect surface water quality. Baffinland also notes that ammonium nitrate is a solid, water-soluble oxidizer, and that available product safety information associates ammonia and nitrogen oxide releases primarily with heating to decomposition, fire conditions, or reaction with strong alkalis, rather than with routine ambient storage conditions. On that basis, Baffinland does not currently consider passive air monitoring to be the highest-value next step for SDLT9, given that a proximate surface source has been identified and corrective actions have already been implemented. Baffinland will nevertheless continue to evaluate whether additional lines of evidence, including passive air monitoring, are warranted if follow-up results do not show the expected improvement. Reference note: Relevant guidance includes British Columbia Technical Guidance 9, <i>Guidance on Preparing Nitrogen Management Plans for Mines using Ammonium Nitrate Fuel Oil Products for Blasting</i>; Natural Resources Canada, Explosives Regulatory Division correspondence on destruction of explosive outer packaging, which notes that such packaging must be destroyed or disposed of so it cannot be reused and that open-air burning has historically been used where no safe and environmentally sound alternative is available; and the Government of Nunavut's <i>Environmental Guideline for the Burning and Incineration of Solid Waste</i>, which emphasizes that burning is not generally promoted and should only be used within a sound waste management framework. Baffinland considers this item (QIA-AE#14) closed.

Table A.2: Response to ECCC Comments on Baffinland’s 2024 QIA-NWB Annual Report for Operations

Cmt. #	Reviewer’s Detailed Comment	ECCC Recommendations	Reference Section	Baffinland’s Response
Total Suspended Solids Freshet Exceedances at Camp Lake Settling Ponds Outfall				
1	Freshet sampling allows for the evaluation of the effectiveness of sediment and erosion control measures in place to reduce total suspended sediment (TSS) loads contributed by snowmelt from the Project’s infrastructure. Results are presented for four sites: “The Camp Lake Settling Ponds Outfall (CLSP-OUT), the Camp Lake Tributary 1 Outfall (CLT-OUT), Sheardown Lake Landfill Gate Tributary Outfall (LDFG-OUT), and Sheardown Lake Tributary 1 Outfall (SDLT-OUT).” Measured TSS concentrations at CLSP-OUT range from 206 to 433 mg/L, above the water licence criteria of 30 mg/L for grab samples and 15 mg/L for average concentrations. Concentrations are consistently higher at CLSP-OUT than at the other three sites. The Annual Report states “pro-active measures were taken prior to freshet to ensure unimpeded flow through water conveyance structures” and reports on remedial works to the drainage feeding into culvert CV-187 and SDLT-OUT. Measures employed at CLSP-OUT were not sufficient to prevent high TSS loads, which can negatively impact the aquatic environment. Further measures should be considered.	ECCC recommends the Proponent discuss what further measures at CLSP-OUT could help reduce TSS loads at freshet.	- Main Document: 2024 QIA-NWB Annual Report (Baffinland Iron Mines Corporation, March 31, 2025) Section 7.3.1.0 Freshet Monitoring - Table 7.6.3: Water Quality Results for Water Licence Monitoring Location - CLSP-OUT - Table 7.6.4: Water Quality Results for Water Licence Monitoring Location - CLT-OUT - Table 7.6.5: Water Quality Results for Water Licence Monitoring Location - LDFG-OUT - Table 7.6.6: Water Quality Results for Water Licence Monitoring Location - SDLT-OUT *incorrectly labelled as LDFG-OUT*	As Sent October 2: As part of Modification 13, Baffinland constructed the Camp Lake Settling Pond (CLSP) structure, which has consistently demonstrated effectiveness in limiting elevated total suspended solids (TSS) concentrations to short durations in the associated stream. It is also noted that the stream has become significantly smaller in volume and flow compared to pre-construction conditions. The low-flow characteristics of the site likely contribute to higher observed concentrations due to the low flow nature across the natural sandy beach., Each year, Baffinland implements sediment and erosion control measures in accordance with the Surface Water Aquatic Effects Management Plan. These include the deployment of flocculant blocks, spring berms, and the installation of silt fencing, which collectively work to minimize the mobilization of residual sediment into the stream. Further, prior to the 2024/25 winter season, select locations around the Project Site were identified as High Priority Snow Removal Areas and/or No Snow Push Areas, including the Camp Lake Sedimentation Pond Outfall location. An awareness campaign was completed with the Departments responsible for snow management and included receptive discussions with their equipment operators about why these changes in snow management are important. This educational approach, re-enforced with monitoring of snow clearing activities by the Environment Department, proved effective by reducing snow accumulation in proximity to the outfall locations, which contributes to increased TSS results during freshet. Given the transient nature of freshet, elevated TSS timeframes dramatically decreased, impact from low flow sampling conditions, and the monitoring of the lake itself through the Core Receiving Environment Monitoring Program (CREMP) continues, Baffinland believes the mitigation measures already in place are working to effectively reduce TSS. Baffinland will continue to monitor performance and assess the effectiveness of existing infrastructure and best management practices as part of its adaptive management approach. ECCC’s Response October 24: ECCC acknowledges that the Proponent’s efforts have reduced TSS loads at the Camp Lake Settling Pond outlet sampling location (CLSP-OUT) by approximately an order of magnitude between 2023 and 2024. However, 2024 TSS concentrations are approximately an order of magnitude higher than water licence criteria and warrant further action.

Cmt. #	Reviewer's Detailed Comment	ECCC Recommendations	Reference Section	Baffinland's Response
				TSS concentrations lower than what is being measured would be expected at the outlet of a settling pond, which raises questions about the pond's retention time and whether it is possible to increase the retention time. The Proponent's response discusses the low flow conditions over a sandy beach of the stream's sampling location. This raises questions about whether sediment is stirred up during sampling and whether a sampling location closer to the pond outlet might yield more accurate results. ECCC recommends the Proponent consider whether increasing the Camp Lake Settling Pond's retention time is feasible and could be beneficial, and whether the current sampling location yields the most accurate measurements of TSS in water discharged from the pond. <u>Baffinland's second Response March 31:</u> The Water Licence no longer includes applicable effluent criteria for the CLSP-OUT sampling location. As noted in the Final Environmental Impact Statement (FEIS), temporary increases in suspended sediment in nearby streams during freshet were anticipated and were assessed as not significant. Baffinland's responsibility is therefore to continue implementing reasonable and practicable measures to minimize the frequency and magnitude of these short-duration freshet-related TSS increases. Baffinland has considered whether additional measures at CLSP-OUT, including increased retention time within the Camp Lake Settling Pond and adjustment of the sampling location, could further improve freshet performance. Since construction of the CLSP structure and effective snow management upgradient, however, the downstream flow regime has become very small and low-flow in nature, particularly during the brief freshet period when sampling occurs. Under these conditions, the volume of water available at the outlet is limited, which both constrains the opportunity for additional meaningful settling within the system and makes collection of a representative water sample inherently difficult. Baffinland has reviewed the outlet area on multiple occasions and has not identified an alternative downstream sampling location that would provide a more representative measure of discharged water quality. Baffinland agrees that it is likely that sample artifacts from the location potentially contribute to TSS within monitoring data as the sample location is characterised by low laminar flows across a sandy beach. Baffinland also notes that, while TSS concentrations measured at CLSP-OUT during freshet may remain elevated under these low-flow conditions, the total volume of water discharged from the system is small. As a result, the overall sediment load potentially reaching Camp Lake is also limited relative to what concentration values alone may suggest. This is consistent with the observed order-of-magnitude

Cmt. #	Reviewer's Detailed Comment	ECCC Recommendations	Reference Section	Baffinland's Response
				reduction in TSS concentrations between 2023 and 2024, reflecting that the mitigation measures already implemented (including sediment and erosion controls, proactive conveyance maintenance, and revised snow management practices around the outfall area) have improved performance. Baffinland will continue to apply these measures and monitor performance at CLSP-OUT as part of its adaptive management approach. Further review of the outlet configuration and monitoring location will continue where practicable, but based on current site conditions Baffinland considers that the principal limitation at this location is the very small, short-duration freshet discharge, which is impacted by the monitoring location, rather than an absence of reasonable mitigation measures.

Table A.4: Response to CIRNAC Comments on Baffinland’s 2024 QIA-NWB Annual Report for Operations

	Subject	Reviewer’s Detailed Comment	CIRNAC Recommendations	Baffinland’s Response
R-01	Review of Previous CIRNAC Annual Report Recommendations (2021 to 2023)	A summary of previous CIRNAC recommendations from QIA-NWB Annual Report reviews from 2021, 2022, and 2023 are provided in the attached Table A. For each recommendation CIRNAC has provided a status to indicate if a past recommendation was Addressed, Not-Addressed, Carried Forward to subsequent Annual Report Recommendations, or considered In Progress. A “In Progress” status refers to action items that have been acknowledged by Baffinland, however additional detail is required in the interim, such as providing committed schedule for delivery and/or providing additional rationale.	CIRNAC recommends Baffinland address all outstanding “Not Addressed” or “In Progress” recommendations by October 15, 2025 (i.e. 90 days from this review). Failure to do so will results in non-addressed recommendations being forwarded to field operations to be further assessed during compliance audit(s).	Baffinland provided a comprehensive response to this recommendation in its October 15, 2025 submission to the Nunavut Water Board, including the information set out in Table A4.1 of that submission. For ease of reference, the full October 15, 2025 submission has been included as Appendix E.13.1A to this Annual Report response. CIRNAC subsequently advised in its October 24, 2025 correspondence to the NWB that: <i>“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.”</i> CIRNAC also requested that responses be presented in the main body of the report or clearly outlined in a dedicated subsection, rather than solely in tabular format. Baffinland notes that responses to the outstanding “Not Addressed” and “In Progress” items were provided on October 15, 2025, with the exception of R26 and R27. On that basis, Baffinland understands that CIRNAC’s October 24, 2025 comment was prepared without the benefit of full consideration of the October 15 submission. Baffinland considers item R-01 to be fully addressed. For continuity and consistency with previous Annual Report response tracking, Baffinland has continued to provide the status and response to CIRNAC recommendations in tabular format below. In addition, to address CIRNAC’s request for a dedicated narrative presentation, Baffinland has included a consolidated summary subsection/memo in Appendix E.13.1B. Responses to the remaining deferred items, including R-26 and R-27 as applicable, are provided in the remainder of the table below and in that appended summary. Baffinland considers this item (R-01) closed.
R-03	Other Details (Schedule B, section I)	Per Section I of Schedule B, the Water Licence requires Baffinland to provide “Any other details on Water use or Waste Disposal requested by the Board by November 1st or the year being reported. In the concordance table, this is listed as N/A. No other information is provided in the Annual Report.	(R-03) CIRNAC recommends Including a section in the report to confirm if other details on Water use or Waste Disposal have been requested by the Board. It is also recommended to provide a summary of past requests of this nature and whether they have been completed.	As no requests were made by the Board for additional information with regard to water use and waste disposal during 2024, Baffinland felt it appropriate to identify this item within the Concordance Table as ‘Not Applicable’. The concordance table also indicates “No other details on water use or waste disposal was requested by the Board by November 1, 2024”. There have been no requests by the Board for other details on water use or waste disposal since the Licence was issued in 2013. Nevertheless, the 2025 Annual Report will include a dedicated section identifying where this information can be found, should the Board request further details in the future.

	Subject	Reviewer’s Detailed Comment	CIRNAC Recommendations	Baffinland’s Response
R-05	Results of the Thermal Monitoring	Per Section E, Item 2, the Water Licence requires Baffinland to provide the “Results of the thermal monitoring and/or research carried out in conjunction with the Waste Rock Management Plan and disposal of potentially acid generating and metal leaching materials, permafrost integrity along the railway alignment and other project sites”. The Annual Report provides an updated list of instrumentation at the WRF in Appendix E.15.1 but monitoring results are not presented. It is also noted that CIRNAC provided recommendations related to thermistor monitoring data and thermal modelling following review of the 2023 Annual Report (Appendix E.13 of the 2024 Annual Report); these included: R-05, R-24, R-25.	(R-05) CIRNAC recommends Baffinland provide the monitoring results for all the instrumentation in operation at the WRF. The results should be formatted in tables and graphs showing the evolution over time and depth. These elements should be included in the report to facilitate trend interpretation.	See Appendix E.13.1C “July 2025 Waste Rock Facility Thermistor Monitoring” Additionally, annual WRF thermal monitoring data, tables and graphs for 2025 are included as Appendix E.15.1 in the 2025 NWB-QIA Annual Report for operations. Baffinland considers this item (R-05) closed.
R-06	Climate Change Scenario	Appendix E.10 provides a technical memorandum about the assessment of active zone depth at WRF considering Shared Socioeconomic Pathways (SSP) 1-2.6 climate change projections. The SSP1-2.6 scenario is the most optimistic, projecting significant reductions in greenhouse gas emissions and a sustainable future. However, it is essential to also consider more conservative scenarios to gain a comprehensive understanding of the potential impacts on the WRF future geochemical stability. Per recommendation R-26 following the review of the 2023 Annual Report (Appendix E.13 of the 2024 Annual Report), CIRNAC recommended: a) Evaluate the predicted ground surface temperatures and permafrost development considering the effects of climate change on the waste rock pile using recent climate change predictions. Within the Appendix E.13 response, Baffinland indicated: “A thermal model to predict the impact of climate change on the depth of ground subject to seasonal freezing and thawing (active zone) at the WRF is currently being developed. A memo summarizing the results of this investigation will be provided in the next update to the ICRP.”	(R-06) CIRNAC recommends Baffinland to consider multiple climate change scenarios when forecasting the long-term temperature evolution in the non-acid generating (AG) cover at WRF. By evaluating a range of scenarios, a comprehensive understanding of the potential impacts of varying climate conditions on the site can be gained. This comprehensive approach will help ensure that predictions are robust and account for different possible futures. Furthermore, CIRNAC recommends a schedule for developing a thermal model to predict the impact of climate change on the depth of ground subject to seasonal freezing and thawing at the WRF.	As outlined in the latest ICRP, Baffinland plans to complete 2D thermal modelling of the WRF active layer in 2026, and plans to consider multiple climate change scenarios. Further details can be found in the latest ICRP.
R-07	Construction Works at the WRF	Per Section G, Item 4, the Water Licence requires Baffinland to provide “A summary, including photographic records before, during and after construction activities, of any modifications and/or major maintenance work carried out on facilities and Infrastructure designed to contain, withhold, divert or retain Water or Wastes, and an outline of any work anticipated for the next year”. Section 2 of the 2024 Annual Report does not include a summary of the construction activities at the WRF. Appendix D.1 provides a picture of the WRF area with a caption mentioning the	(R-07) Provide a summary of the construction activities carried out at the WRF in 2024, including pictures that show the progression of the works. Additionally, include a list of the main construction activities planned for 2025 in this area.	Please see Appendix E.13.1D – As Built Report for the 2024 Geotube Pond Liner Replacement. Baffinland considers this item (R-07) closed.

	Subject	Reviewer's Detailed Comment	CIRNAC Recommendations	Baffinland's Response
		completion of geotube replacement at the WRF water treatment plant (Photo 12). However, there are no pictures.		
R-08	Construction Materials – Geochemical Properties, Used Volumes and Destination	Per Section G, Item 5, the Water Licence requires Baffinland to provide “A summary of the results of any geochemical analyses conducted on materials used to construct facilities and infrastructure under Part D, Item 13”. In the 2024 Annual Report, it is mentioned that waste rock from Deposit 1 and material from Quarry Q1 located at Milne Port were used for construction purposes. Appendices E.6.2 and E.7 presents the results of the Deposit #1 waste rock and Quarry Q1 material testing respectively and their classification based on Baffinland's Acid Rock Drainage (ARD) classification. Results are presented in tables but not summarized. Summary figures and graphs with interpretation typically accompanies an Annual Report. The metal leaching and acid rock drainage (ML-ARD) properties of waste rock from Deposit 1 are analyzed during the operations and validated on a regular basis with off-site laboratory tests. The properties of the Quarry Q1 material should be monitored in the same manner.	(R-08) CIRNAC recommends Baffinland provide summary figures and interpretative graphs for the geochemistry results of the construction materials. As well, provide detailed analytical results of the geochemical properties of the material extracted from Quarry Q1 done in an off-site laboratory for validation.	Baffinland acknowledges CIRNAC's recommendation regarding summary figures, interpretive graphs, and off-site validation results for construction materials used at site With respect to Quarry Q-01, Baffinland notes that no active drilling or blasting occurred at that location in 2025. As ABA and geochemistry samples for Quarry Q-01 are collected from drill cuttings generated prior to blasting, no new Quarry Q-01 analytical results were generated in 2025. While some previously quarried material from Q-01 continued to be used for construction purposes during the reporting period, that material had already been characterized through prior years' sampling and analysis. Referencing the requirements in the water licence, Baffinland notes there is no explicit requirement for graphs with interpretation, regardless, for 2025 waste rock geochemistry, Baffinland will provide new tables and figures in Section 9 of the 2025 Annual Report to better present the geochemical characteristics of construction waste rock used during the reporting period. The new figures will be presented in Table 9.3 and Figure 13 of the 2025 Annual Report, and will provide a more interpretive presentation of the 2025 geochemistry dataset than in previous reporting. Accordingly, no new 2025 Quarry QMR2 or Q-01 off-site laboratory validation results are available to report, as no new material was drilled or blasted from that source during the year. However, Baffinland considers that the additional 2025 construction waste rock geochemistry summaries in Section 9 will address CIRNAC's broader request for clearer presentation and interpretation of construction material geochemical results.
R-09	Waste Rock ARD Classification	Per Section G, Item 11, the Water Licence requires Baffinland to provide “The results of any further acid/base accounting conducted on potential acid generating and non-potential acid generated waste rock (PAG and NPAG)”. The results of the 2024 operational testing as per Baffinland's ARD classification are provided in Appendix E.6.1 through E.6.3. The results of the 2024 QA/QC drilling program on the Non-PAG cover material at WRF are detailed in Section 9.6 and Table 9.2, based on Baffinland's ARD classification. However, the drilling depth is missing in Table 9.2, which is necessary to validate the cover thickness. Additionally, there are no summary figures or graphs with interpretation. The results for the acid base accounting (ABA) and shake flask extraction (SFE) testing	(R-09) CIRNAC recommends: a) the addition of the drilling depths in the information provided in Table 9.2. b) Provide summary figures and interpretative graphs for the geochemistry results obtained on-site for waste rock. c) Provide the results of the off-site laboratory validation analysis (ABA and SFE) and the report of the third-party consultant.	a) With respect to CIRNAC's recommendation to include drilling depths in Table 9.2, Baffinland notes that Table 9.2 was included in the 2024 Annual Report to summarize results of the 2024 QA/QC drilling program for the 4 m NAG cover requirement at the WRF, completed in response to the specific requirement from QIA and CIRNAC that at least 85% of the WRF be capped with a minimum of 4 m of NAG waste rock. While drilling depth information was not reproduced in Table 9.2 itself, the primary basis for confirming achievement of the 4 m cover requirement was the signed and stamped quarterly WRF QA/QC reporting, supported by certified survey elevations used to verify cover thickness across the applicable WRF footprint. In addition, the detailed Q4 WRF QA/QC report, including the technical memo titled Waste Rock Facility Drilling and Sampling Campaign, Cover Requirement Evaluation prepared by WSP Canada Inc., documents the drilling and sampling program completed under the approved WRF QA/QC Monitoring Plan and provides additional supporting technical context for the confirmation program. Taken

	Subject	Reviewer's Detailed Comment	CIRNAC Recommendations	Baffinland's Response
		conducted off-site are not provided. Furthermore, the report of the third-party consultant review, which compares on-site lab results and confirms the segregation criteria, is also not included.		together, these submissions demonstrate that achievement of the 4 m NAG cover thickness requirement was formally confirmed through the approved QA/QC reporting process. b) With respect to CIRNAC's recommendation for summary figures and interpretive graphs, Baffinland will provide additional tables and figures in Section 9 of the 2025 QIA-NWB Annual Report for Operations to better summarize the relevant on-site waste rock geochemistry results, however notes this is not an explicit requirement of water licence annual reporting requirements. These figures will provide a more interpretive presentation of the geochemistry dataset than in previous reporting and will support review of the material characterization results specifically for NAG. c) With respect to CIRNAC's recommendation to provide the results of the off-site laboratory validation analyses and the report of the third-party consultant, Baffinland notes that the relevant third-party review is the WSP Canada Inc. technical memo referenced above, which documents the drilling and sampling campaign and provides supporting technical evaluation of the cover verification program and applicable segregation criteria (included as Appendix E.13.1F). Baffinland further notes that ABA and Shake Flask Extraction (SFE) results associated with the WRF QA/QC program were provided in the appended analytical results of the quarterly WRF QA/QC reports submitted to CIRNAC and QIA. In addition, those quarterly reports were signed and stamped and included the supporting survey-based confirmation of cover thickness. Accordingly, Baffinland does not consider the off-site validation results, third-party technical review, or cover thickness confirmation to represent a reporting gap, as those materials were already provided through the quarterly WRF QA/QC reporting submitted to CIRNAC and QIA (see Appendix E.13.1E for the 2024 Q4 WRF QA/QC report). Reference note: Relevant context includes Table 9.2 of the 2024 Annual Report, the approved WRF QA/QC Monitoring Plan, the signed and stamped quarterly WRF QA/QC reports submitted to CIRNAC and QIA, which include supporting certified survey elevations used to confirm achievement of the 4 m NAG cover over at least 85% of the WRF, and the WSP Canada Inc. technical memo Waste Rock Facility Drilling and Sampling Campaign, Cover Requirement Evaluation. Baffinland considers this item (R-09) closed.
R-11	Record of Progressive Reclamation Activities	The Water Licence requires Baffinland to include photographic records of site conditions before and after progressive reclamation activities. Further, the Water Licence requires Baffinland to include an outline of any work anticipated for the next year, including any changes to implementation and scheduling. A summary of	(R-11) CIRNAC recommends Baffinland provide details including reclaimed areas (in square meters) and photographic records including before and after photos for all progressive reclamation activities. Furthermore, include a summary of planned	In the 2025 QIA-NWB Annual Report for Operations, Baffinland has provided details and photographic records for progressive reclamation activities at a number of reclaimed borrow source locations in Appendix C.1.6, and details of the maintenance of the Non-AG waste cover of the WRF in appendix E.15. Baffinland's planned progressive reclamation work related to borrow areas along the Tote Road is presented annually in Appendix C.4 of the Annual Report for Operations.

	Subject	Reviewer's Detailed Comment	CIRNAC Recommendations	Baffinland's Response
		progressive reclamation of the borrow sites along Tote Road was mentioned, however, no photographic records or details were provided. Furthermore, no indication of planned work, changes to implementation, or schedules were provided. In addition, Section 8.1 and Table 8.1 did not include any discussion or detail on progressive reclamation of the WRF. Section 9.6 of the Annual Report describes the QA/QC results for the WRF, however, no photographic records are included to confirm and review progressive reclamation activities.	work, changes to implementation, and anticipated schedules or changes to reclamation scheduling.	More detailed implementation schedules are not practical to commit to in advance, given the operational realities of the Project, including unanticipated equipment downtime, material availability constraints, the timing of sealift deliveries, and a short, weather-dependent construction season. Accordingly, reclamation activities are advanced through an adaptive approach that prioritizes emerging risks and takes advantage of operational windows when personnel, equipment, materials, and site conditions are aligned to safely and effectively complete the work. However, tentatively Baffinland plans to progress remediation on 4 priority Cuts adjacent to the Tote Road as well as progress QMR2 reclamation planning in 2026. Baffinland considers this item (R-11) closed.
R-14	Mine Site Explosive Magazine Area – Water Quality Monitoring	Section 22 of Part I states "The licensee shall establish additional Monitoring Stations, as may be required, to effectively and adequately monitor surface runoff from the Mary River Project site(s) or discharge from Site Drainage and Surface Water Management System water associated with the Mary River Project. Within thirty (30) days of establishment of additional Monitoring Stations, the licensee shall inform the Board and the Inspector." In Photograph 22, Appendix D.1, a culvert was observed connecting a pond at the Explosive Magazine area to a suspected discharge location to the Mary River with visible iron staining (red) on the substrate of the channel. This may be a recycled water monitoring location, but the location identifier was not provided in Figure 5. Table 7.1 describes MS-13 as the "Mine Site Explosive Magazine Pond" as describes its status in 2024 as "Not Constructed". Table 2.3 states MS-13 is no longer required because the water is diverted away from this location by re-routing water to the KM105 Dam. However, based on the imagery provided by Baffinland this does not appear to be effective as water is clearly visible in Photograph 22. Photograph 26 shows an open culvert leading from the water collection pond to an iron-stained channel above the Mary River.	(R-14) CIRNAC recommends the surface water pond located at the Explosive Magazine be added to the annual Monitoring Program and be sampled for Groups 1, 5, 7 and 8 as described in Schedule I, Table 12. If this location is MS-13 it is recommended that it be included in the annual monitoring program.	In response to CIRNAC's recommendation and detailed comment, Baffinland would like to make the following clarifying points: - There is no discharge location within the 2 photos, apart from the MS-07 final discharge point. The "pond" Baffinland believes CIRNAC identified visible in photo 26, is non-contact water snowmelt that has settled into a naturel depression. Baffinland invites CIRNAC to investigate this area onsite during the next scheduled inspection. - Prior to the Modification 13 being accepted and haul road water being rerouted to the KM 105 Facility the ponded area adjacent to the explosives Magazines used to receive Mine Haul Road surface water runoff, however following the implementation and construction of the KM 105 Facility all mine haul road culverts have been closed and all ditch contact water is directed to the KM 105 Facility. Due to the elevated levels iron in the area, as mentioned in the FEIS (Volume 7, p 101), residual staining exists, from when haul road water historically drained to the location. - This is not the recycled water location. The recycled water is effluent from the MS-07 pond that meets the MDMER and Water Licence criteria. - As stated previously, the "pond" CIRNAC identified is non-contact water snowmelt which has settled into a natural depression and therefore will not be monitored as per Schedule I of the Water Licence. Further, this area is not the proposed and no longer required MS-13. Baffinland considers this item (R-14) closed.
R-15	Water Quality Blank and QAQC Issues	In 2022, twenty-six (26) and in 2023 fourty-six (46) water quality parameters in the field, travel and equipment blanks had values greater than their respective parameter's lower detection limit (LDL). In 2024, 160 water quality parameters in the field, travel and equipment blanks collected as part of the stream and lake sampling	(R-15) CIRNAC recommends Baffinland provide additional comments on what the other sources of contamination are and how they are not likely to influence field collected samples. It is also recommended standard operation protocols for sampling be reviewed	To further evaluate the source of blank contamination, Baffinland completed an assessment of the deionized water used in the QA/QC program in 2024. Based on that assessment, Baffinland concluded that analyte detections above the LDL in field, trip, and equipment blanks were not attributable to the source water itself, but were more likely associated with low-level contamination introduced during blank preparation, handling, transport, or field activities. Consistent with recognized QA/QC guidance,

		had values greater than their respective parameter LDL. Baffinland has shown the detectable concentrations are not related to their deionized water but linked to preparation of the blanks. In Appendix E.9.1 it is stated that the blank sample contamination is other sources that would have been likely to influence field collected samples and that water chemistry data is considered acceptable for this study.	to prevent further quality control and assurance issues.	these potential sources include sample containers, filtering or sampling equipment, preservatives, workspace conditions, atmospheric exposure while blanks are opened and handled, and other systematic or random errors introduced between preparation and analysis. As set out in the Project’s QA/QC Plan, the preferred objective for blank samples is that analytes be non-detectable. However, blank results are not interpreted solely on the basis of whether a result marginally exceeds the LDL. Rather, significance is assessed based on the magnitude of the detection relative to the applicable detection limit. Under the Project QA/QC Plan, detections greater than the LDL but less than or equal to five times the LDL are interpreted as low-level detections near the practical limit of analytical sensitivity, whereas detections greater than five times the LDL are considered significant and are investigated. This approach is consistent with broader Canadian QA/QC practice, which supports establishment of project-specific DQOs and provides five times the reportable detection limit in a blank as an example quantitative DQO. For the 2024 stream and lake sampling program, three blank results exceeded the Project’s greater-than-five-times-LDL significance criterion, representing approximately 1% of all blank results. These results were investigated in accordance with the QA/QC Plan. Based on that review, Baffinland concluded that the low-level detections observed in other blanks were most consistent with localized contamination associated with blank preparation and handling, rather than a systematic contamination source that would be expected to materially influence the interpretation of field-collected water quality samples. In this context, blank detections function as an indicator for review and corrective action, not as automatic evidence that associated field sample data are invalid. Nevertheless, in response, Baffinland has reviewed and updated relevant sampling SOPs, as appropriate, and implemented corrective actions across the field sampling program. These actions include increased training and awareness for field personnel, improved cleaning and storage of sample containers and associated sampling equipment, enhanced workspace cleanliness during blank preparation and sample handling, and continued review of blank results against the Project QA/QC Plan data quality objectives, with follow-up investigation and corrective action implemented where warranted. This is consistent with Canadian guidance emphasizing that DQOs should be established in advance, performance against those DQOs should be checked routinely, and remedial action should be taken when those objectives are not achieved. Reference note: Relevant guidance includes the Project QA/QC Plan, CCME’s <i>Protocols Manual for Water Quality Sampling in Canada</i>, which describes blanks as tools to identify contamination from containers, equipment, preservatives, atmosphere, handling, transport, and other systematic or random errors, the <i>British Columbia Field Sampling Manual - Part E1: Surface Water</i>, which supports use of project-specific DQOs and provides five times the reportable detection limit in a blank as an example quantitative
--	--	---	---	--

	Subject	Reviewer's Detailed Comment	CIRNAC Recommendations	Baffinland's Response
				DQO, and Environment and Climate Change Canada's <i>Metal Mining Technical Guidance for Environmental Effects Monitoring</i>, which describes field and trip blanks as checks on contamination from sample handling and preservation/storage conditions. Baffinland considers this item (R-15) closed.
R-17	Tote Road Priority Actions	Per recommendation R-07 following review of the 2023 Annual Report (Appendix E.13 of the 2024 Annual Report), Baffinland indicated "A third-party re-assessment of the Tote Road borrow areas was completed and will inform the detailed action plan for addressing geotechnical risks associated with all identified borrow areas. The full detailed plan will be presented in the 2024 NWB QIA Annual Report for Operations". Baffinland provided the 2023 Tetra Tech Canada Inc. (Tetra Tech) report and a preliminary summary of the action plan. However, the detailed action plan has not yet been completed.	(R-17) CIRNAC recommends Baffinland provide a schedule for completion of the detailed action plan for addressing geotechnical risks associated with all identified borrow areas.	Baffinland acknowledges CIRNAC's recommendation to provide a schedule for completion of the detailed action plan for addressing geotechnical risks associated with identified borrow areas. Baffinland notes that the relevant priority actions for borrow areas are already identified and tracked through Appendix C.4, Tote Road Priority Action Schedule, which is updated annually as part of the Annual Report for Operations. Baffinland provides information for borrow and cut reclamation completed annually and projected borrows for completion the upcoming year in section 8 and Appendix C.4 of the Annual Report for Operations. Baffinland further notes that the Water Licence does not require the level of detailed implementation scheduling requested in this recommendation. While the required priority actions are already identified in Appendix C.4, Baffinland does not consider it practical or appropriate to commit to fixed implementation dates for each item, as the timing of completion must remain flexible to reflect both risk priority and the operational constraints of a remote northern site. As a result, implementation of borrow area remediation and related risk-reduction measures must be scheduled annually and adaptively, based on emerging risk, site conditions, operational readiness, and the availability of equipment, personnel, and materials. Accordingly, Baffinland will continue to identify and report priority borrow area actions through Appendix C.4 and to advance those actions as conditions allow through its normal risk-based operational and reclamation planning processes. Annual reporting will continue to provide updates on progressive completion of borrow area remediation and related risk management activities on an annual basis. Baffinland considers this item (R-17) closed.
R-19	Alternative Remediation Methods for Hydrocarbon-Impacted Soils	Per recommendation R-18 following review of the 2023 Annual Report, Baffinland acknowledged and will continue to prioritize the investigation of alternative remediation methods for the treatment and disposal of hydrocarbon impacted soils. Further, Baffinland notes that "Due to various operational issues sufficient details are not yet available for inclusion in the 2024 Annual Report".	(R-19) CIRNAC recommends a schedule for delivery of a remediation plan and/or study work plan for ongoing investigation of alternative remediation treatment and hydrocarbon disposal be provided.	Baffinland acknowledges CIRNAC's recommendation to provide a schedule for delivery of a remediation plan and/or study work plan for ongoing investigation of alternative remediation treatment and hydrocarbon disposal options. Following the limited success of previous landfarm treatment efforts under Arctic site conditions, Baffinland has engaged a qualified engineering consultant to develop a practical, northern-appropriate Landfarm Operations Plan and performance verification program. The purpose of this work is to establish an implementable approach to treatment of hydrocarbon-impacted soils under the constraints of short thaw seasons, low ambient temperatures, frozen materials, and site access/equipment limitations. The work will also support ongoing evaluation of alternative remediation treatment and

	Subject	Reviewer's Detailed Comment	CIRNAC Recommendations	Baffinland's Response
				disposal approaches, as needed, for soils that may not be effectively treated through conventional landfarming methods. The consultant's work is expected to include a detailed operating plan describing the field activities required to optimize treatment performance under northern conditions, together with a performance verification and sampling program to assess treatment progress and effectiveness. This work will be supported by significant landfarm soil characterization sampling during the 2026 field season. Baffinland's current schedule is to finalize the consultant-led Landfarm Operations Plan in 2026, complete supporting characterization and field verification work during the 2026 operational season to inform on potential treatment processes and schedules moving forward. In this way, Baffinland considers that CIRNAC's recommendation is being addressed through a structured consultant-led work program that is intended to produce a practical remediation approach suited to the realities of remote northern mine operations.
R-20	Schedule I Monitoring Requirements	Per recommendation R-19 and R-22 following the review of the 2023 Annual Report (Appendix E.13 of the 2024 Annual Report), CIRNAC requested: a) (R-19) Water quality samples should be analyzed per the Group 7 parameters listed in Schedule I, Table 12 of the Water Licence, which includes both total and dissolved parameters. b) (R-19) Flow rates should be measured from seepages and collection ditches to refine the water balance and support the geochemical review of the WRF performance; and c) (R-22) That Baffinland provide all results of the Schedule I monitoring parameters required by the Water Licence no later than September 30, 2024, and in all future Annual Reports. A review of 2024 monitoring reports and tables provided in the Annual Report identified total and dissolved metals do not appear to be collected at the required frequency. For example, location MS-07 should be sampled monthly during the summer for Groups 1 and 7 parameters. A review of the tables includes analysis of Groups 1 and 7 parameters for one September 2024 sample, and one October 2024 sample. However, flow volumes and analysis of other parameters (e.g., TSS and oil and grease) were collected between the months of June and August (i.e., summer). As such, it appears all Group 1 and 7 parameters were not sampled during the summer months, as required by the Water Licence, Schedule I. Table 7.1 within the Annual Report provides a summary of sample locations, however, limited detail is provided to confirm sampling	(R-20) CIRNAC requests: a) Include methodology and back-up data for how flow rates and/or discharge volumes are calculated at each monitoring location. b) A summary table of sampling locations to confirm Schedule I monitoring and sampling requirements are being met. This should include confirmation sampling/ monitoring was completed at the required frequency and analysis was completed for the required parameters for each applicable location listed in Schedule I of the Water Licence. Clear rationale for any deviations should be included.	With respect to CIRNAC's recommendations: a) Methodology and back-up data for flow rates and/or discharge volumes Methodology for calculating flow rates and discharge volumes is provided in the <i>Fresh Water Supply, Sewage, and Wastewater Management Plan</i>. In addition, daily discharge volumes for Schedule I discharge points are already reported in the Annual Report tables, including Table 5.1 (Sewage), Table 5.3 (Containment Area Stormwater), and Table 5.4 (Surface Water Management Ponds Stormwater). At most discharge locations, discharge volume is measured using pump totalizers installed on the discharge systems, and these data are also reported through the monthly Water Licence reporting process. The exception is MS-11, where flow is determined using daily manual flow measurements during the initial thaw period, followed by calculation using a pressure transducer once site conditions allow. To improve clarity, Baffinland will expand the text in future reporting to more clearly describe the flow or discharge measurement methodology applicable to each relevant discharge location and to cross-reference the supporting tables where those data are reported. b) Confirmation that Schedule I monitoring requirements are being met Baffinland confirms that Schedule I sampling requirements apply when discharge is occurring. Where no discharge occurs at a licensed effluent monitoring station, effluent sampling is not required under Schedule I for that period. With respect to MS-07, Baffinland confirms that no discharge occurred during July 2024, and therefore no Schedule I effluent sampling was required during that period. The sampling results presented in Table 7.6.2 for parameters such as TSS, pH, and oil and grease were collected to satisfy Part E, Item 5 of the Water Licence, and do not represent Schedule I effluent monitoring requirements.

	Subject	Reviewer's Detailed Comment	CIRNAC Recommendations	Baffinland's Response
		frequency and analysis requirements under Schedule I of the Water Licence have been met. Flow rate/ volume measurements are presented in the Tables appended to the Annual Report and are generally reported as cubic metre per day. It was not clear how these flow measurements were derived.		Baffinland notes that the relevant discharge volumes and water quality results are already presented in the Table 5 and Table 7 series of the Annual Report. To address CIRNAC's comment, Baffinland will improve the accompanying text in future reporting to more clearly identify which stations were discharging during the reporting period, when Schedule I sampling was triggered, and how the reported results align with the applicable Water Licence sampling frequency and parameter requirements. This text has been added to section 5.1.3 of the 2025 QIA-NWB Annual Report for Operations. It should also be noted that discharge timing is comprehensively outlined in table 3 of the Monthly Water Licence Reports throughout the year, as well Schedule I compliance is tracked in Table 1 of the Monthly Water Licence Reports. Baffinland considers these items (R-20 a-c) closed.
R-21	Performance of P-SWD-3 Surface Water Collection Ditch	Per recommendation R-10 following the review of the 2023 Annual Report (Appendix E.13 of the 2024 Annual Report), CIRNAC recommended: a) Continue to monitor the P-SWD-3 to ensure that the improvement work was effective (if it was reconstructed) and that it meets the required intent to convey surface runoff, as part of the follow up action. Provide a detailed update regarding efficacy of the redesign in the 2024 Annual Report. b) Implement the recommendation in the 2023 Annual Geotechnical Inspection Reports which include: i. Redesign and reconstruct the ditch to drain the large amount of surface water arising from the snow stockpile located to the north-east. ii. A perimeter diversion berm be provided around the snow stockpile area and that the surface water generated by the melting snow be conveyed to the P-SWD-3 ditch in a separate new drainage ditch. iii. Ditch reconstruction should consider reinstalling a culvert beneath the access road to the snow stockpile to the correct invert levels. iv. A rock-fill check dam be installed at the discharge point of the upgraded ditch. c) Assess the thermal and freeze/thaw stability of all drainage ditches and its slopes to ensure the ditches meet the design intent of conveying surface runoff. Baffinland's response indicated: "The 2024 Geotechnical Inspection was completed (Appendix C.2 of the 2024 NWB QIA Annual Report for Operations), and the geotechnical engineer has provided new recommendations. Baffinland has committed to take the following action: Drainage improvement initiatives will be considered in 2025 with intent to	(R-21) CIRNAC retains the recommendation from 2023 until geotechnical engineer recommendations from the 2024 Geotechnical Inspection are implemented and a response to recommendation point c) is provided by Baffinland's geotechnical engineer.	Baffinland acknowledges CIRNAC's recommendation and confirms that the recommendations arising from the 2024 Annual Geotechnical Inspection remain under active consideration within the Project's ongoing risk-based work planning processes. Baffinland notes that the geotechnical engineer's recommendations associated with P-SWD-3 and related drainage features are not all of equal urgency and, like other corrective actions at site, must be prioritized on a risk basis. In this context, actions are scheduled having regard to the relative potential risk to safety, environmental performance, and infrastructure integrity, together with the operational realities of the Project. The SWD-3 ditch still operates effectively and conveys water to monitoring locations, which reported no elevated TSS criteria for 2025. At present, drainage improvement work associated with P-SWD-3 and related features is planned. However, Baffinland notes that implementation timing must remain adaptive and may be deferred if higher-priority environmental, safety, or operational risks require attention within the same construction window such as construction work with the Km 105 Facility and fish bearing crossings on the Tote Road. This is particularly important given the constraints of a remote northern operation, including unanticipated equipment downtime, material availability constraints, the timing of sealift deliveries, and a short, weather-dependent construction season. Baffinland further notes that the Water Licence does not require fixed, detailed implementation schedules for individual geotechnical recommendations of this nature. Nevertheless, Baffinland will continue to track these items through its normal risk-based operational planning processes and will provide updates on implementation progress through future Annual Reporting. With respect to CIRNAC's retained recommendation (point c) regarding assessment of the thermal and freeze/thaw stability of drainage ditches and slopes, Baffinland notes that these features operate in a continuous permafrost environment and are therefore subject to expected seasonal changes in thermal condition and hydraulic behaviour. Their

	Subject	Reviewer’s Detailed Comment	CIRNAC Recommendations	Baffinland’s Response
		improve the drainage capability of the P-SWD-3 ditch. Damaged or impacted culverts will be evaluated to consider if it still effectively passes water.” Baffinland also indicated in response to recommendation point c) above: “Baffinland will review this recommendation with the geotechnical engineer for assessment during the 2025 annual Geotechnical Inspection.”		primary function is generally most critical during freshet, when frozen ground limits infiltration, runoff coefficients are high, and effective surface conveyance is required to manage snowmelt and prevent erosion or washout of adjacent infrastructure. Baffinland does not consider seasonal thaw-related infiltration through berms or ditch slopes, in itself, to indicate that these features are not functioning as intended. Performance must be assessed in the context of each feature’s intended function, the seasonal hydrologic conditions under which it operates, and whether any thaw-related seepage presents a credible risk to infrastructure performance or environmental protection. For features managing contact water, conveyance ditching from facilities are regularly inspected and assessed for competency and stability, should seepage or instability be observed downgradient containment and seepage interception measures are constructed. For the majority of diversion features managing clean, non-contact water, some seasonal infiltration through thawed materials is not considered critical to environmental protection, provided the features continue to perform their intended diversion function during freshet and other higher-flow periods. It should be noted that P-SWD-3 is not a ditch associated with a waste or water retention facility and is solely constructed to support diverting water away from the camp pad. Baffinland manages these conditions through its existing inspection, monitoring, and adaptive management framework, including annual geotechnical inspections, routine field observations, seepage and water management monitoring where applicable, and implementation of corrective measures where performance issues are identified. Baffinland therefore considers drainage ditch and berm performance to be appropriately managed under the current inspection, monitoring, and adaptive management framework, with focused attention applied where thaw-related conditions create a credible infrastructure or environmental risk. Baffinland Considers this item (R-21) closed.
R-22	Seepage monitoring	As per Part I of the Water Licence it is the responsibility of Baffinland to monitor and report seepage from all facilities designed to contain, withhold, divert or retain water or wastes. The current groundwater monitoring program only focuses on the landfill facility and select hazardous waste berm facilities. There are no groundwater wells to monitor any potential seepages from other areas of the Site including but not limited to the pit (Mine Workings Area), waste rock facility, ore storage pads, etc. There appears to be no way to assess if liners are performing as intended outside of observing if they are retaining water and that no seepage is observed at the toe of the berms. Additionally, several diversion features are unlined. At the waste rock facility based on the LGL Limited inspection completed in September it was noted that there is still concern that the liner within the	(R-22) CIRNAC recommends that the groundwater monitoring plan be expanded to the WRF and other areas of the site to assess for potential subsurface seepage in the active zone. This should include any areas where seepage as defined by the licence may be present.	Baffinland acknowledges CIRNAC’s interest in confirming that potential seepage from site facilities is being appropriately monitored. At the Mary River site, hydrogeologic conditions are strongly controlled by continuous permafrost. Seasonal subsurface flow is generally limited to the shallow active layer, which typically reaches a maximum depth of approximately 3 m and remains frozen for most of the year. Below the active layer, the underlying permafrost forms a low-permeability barrier that substantially limits deeper groundwater flow pathways. As a result, the most relevant potential seepage pathway at site is shallow seasonal active-layer flow, rather than migration through a persistent deep groundwater system. For this reason, Baffinland considers existing seepage, surface water, and receiving environment monitoring programs to be the most appropriate tools for detecting and assessing potential seepage at site. Any shallow active-layer seepage that develops

	Subject	Reviewer’s Detailed Comment	CIRNAC Recommendations	Baffinland’s Response
		collection pond may be leaking. Seepage is being monitored through visual observations but there is no current or mention of future monitoring of groundwater to determine if seepage is discharging through the subsurface.		during thaw would be expected to report locally to the ground surface or nearby drainage features, where it can be identified through routine visual inspections, seepage observations, water level observations, and water quality monitoring conducted under the Surveillance Network Program (SNP), Waste Rock Management Plan QA/QC (WRMP QA/QC) program, and the Core Receiving Environment Monitoring Program (CREMP). These programs are therefore considered to provide the most practical and site-appropriate means of assessing seepage under northern permafrost conditions. With respect to the Waste Rock Facility (WRF) specifically, previous investigations have not identified a persistent saturated groundwater zone suitable for a conventional groundwater monitoring well network in that area. In addition, following implementation of the 4 m non-acid generating (NAG) waste rock cap over 85% of the facility (confirmed by quarterly WRMP QA/QC reporting) instrumentation has confirmed that frozen conditions are maintained year-round within the facility profile and remain well above the original ground surface. In addition to supporting PAG management, this substantially limits the potential for waste rock contact water or other associated constituents to migrate into the seasonal active layer or to support sustained subsurface seepage migration. Monitoring to date has indicated that total suspended solids has been the principal seepage-related parameter of interest, while pH has not been a concern in recent years and metals have never exceeded discharge criteria. This is consistent with the effectiveness of current waste placement and mitigation measures within the WRF, including the 4 m NAG waste rock cap, which supports both PAG control and maintenance of frozen conditions within the facility profile. Baffinland therefore considers liner and containment performance to be appropriately assessed through practical and site-specific lines of evidence, including retention of water within containment features, conveyance grade inspections, routine visual inspections for seepage, thermistor-based confirmation of frozen conditions within the WRF profile, water level observations, seepage monitoring, and water quality monitoring in adjacent streams and lakes through the SNP and CREMP programs. These lines of evidence are considered more informative in this setting than installation of a broad conventional groundwater well network in areas where persistent saturated subsurface conditions are limited or absent. Regarding the collection pond at MS-08, Baffinland acknowledges the concern raised during the September inspection and confirms that seepage monitoring and appropriate controls were implemented during the 2025 operating season to support management of any seepage that may occur. Baffinland will continue to monitor liner performance and will implement repairs or other corrective measures, as warranted, to maintain the intended function of the containment system. No seepage was observed from the WRF

	Subject	Reviewer’s Detailed Comment	CIRNAC Recommendations	Baffinland’s Response
				containment pond liner in 2025. A seepage collection ditch remains in place for potential seepage if any should occur. Accordingly, Baffinland does not consider broad expansion of a conventional groundwater monitoring well network across the site to be technically warranted or likely to provide more meaningful information than the seepage, thermistor, and receiving environment monitoring lines of evidence already in place. It is important to note that baseline data does not exist for groundwater on the Project, which makes interpreting the data difficult for potential contaminates of concern. However, Baffinland will continue to evaluate whether targeted active-layer seepage investigations or other site-appropriate monitoring methods are warranted in specific areas where observations indicate a credible potential for subsurface seepage. Baffinland also notes that the features referenced in CIRNAC’s comment as unlined diversion features are engineered clean water diversion ditches. These are not containment structures designed to retain water or waste and therefore are not intended to be lined. Baffinland considers this item (R-22) closed.
R-23	Rainfall/ Climate Change	There was an unprecedented rainfall event at the site on September 20, 2024 (App C1.2; Construction Summary Report Tote Road Emergency Remediation September 2024). It has resulted in significant damage to the roads and surface runoff management infrastructure. An unprecedented rainfall event calls for a special engineering inspection of all earthworks (dams, dikes, spillways) associated with the surface water management systems. This event may require re-examining the hydrology design criteria for the project and the climate change predictions at the site incorporating site climatic historic data.	(R-23) CIRNAC recommends the site climatic database be updated, the hydrology design criteria be re-evaluated, surface water management infrastructure adequacy be re-evaluated, and all dykes, dams & related earthworks are inspected by the Engineer of Record.	Baffinland acknowledges that the September 20, 2024 rainfall event was an extreme event that caused localized damage to Project infrastructure, including sections of the Tote Road and associated surface water management features. Baffinland agrees that such an event provides an important opportunity to assess infrastructure performance, confirm adequacy of existing controls, and incorporate lessons learned into ongoing engineering review and operational preparedness. At the same time, Baffinland does not consider it technically appropriate to automatically revise project-wide hydrology design criteria or re-open all engineering design assumptions solely on the basis of one isolated event which is beyond the scope of industry standard engineering practices. The September 2024 event is instead being treated as an important line of evidence to inform ongoing review. In that regard, Baffinland notes that, notwithstanding localized damage to two portions of the Tote Road, the broader performance of ponds and related surface water management infrastructure during an event estimated to exceed the 1:1000-year 24-hour rainfall event provides evidence that the existing design approach was generally robust and incorporated sufficient conservatism to perform well beyond the nominal design event at many locations. This observed performance of most water management infrastructure and containment facilities operating through a 1 in 1000-year event and not experiencing significant failures or overtops supports a focused, risk-based review of affected or potentially vulnerable infrastructure, rather than automatic project-wide redesign based on one event in isolation.

	Subject	Reviewer's Detailed Comment	CIRNAC Recommendations	Baffinland's Response
				Consistent with current Canadian engineering and climate adaptation guidance, climate resilience and design refinement are more appropriately addressed through a risk-based and adaptive approach that considers site performance observations, applicable engineering standards, available historical and regional climatic data, and evolving understanding of plausible future conditions. With respect to CIRNAC's recommendation, Baffinland will continue to incorporate updated climatic information, including the September 2024 event together with available regional and site-specific precipitation records, into ongoing engineering review of relevant hydrologic assumptions and infrastructure performance. Baffinland also recognizes the importance of appropriate engineering inspection of affected or potentially affected dykes, dams, spillways, and related earthworks, and will continue to complete the annual geotechnical inspection for waste and water retention facilities. In summary, Baffinland notes the September 2024 rain event was outside of industry standard water management engineering designs and considers that the appropriate response to the September 2024 event is a focused, risk-informed review of the performance and adequacy of relevant surface water management infrastructure and associated earthworks, together with incorporation of lessons learned into future design refinement, inspection, and preparedness measures, rather than automatic project-wide redesign based on one event alone. Reference note: Relevant guidance includes Engineers Canada's <i>Public Guideline: Principles of Climate Adaptation and Mitigation for Engineers</i>, which supports a risk-based and adaptive approach using plausible future conditions, professional judgment, and progressive refinement over time; Housing, Infrastructure and Communities Canada's <i>Codes, standards and guidance for climate resilience</i>, which summarizes current Canadian climate-resilient infrastructure standards work; and TAC's <i>Guide to Bridge Hydraulics, Third Edition</i>, which includes updated Canadian guidance related to climate change, extreme weather events, and permafrost in hydraulic and hydrologic design. Baffinland considers this item (R-23) closed.
R-24	Acidification in ML/ARD Samples	Per recommendation R-27 following the review of the 2023 Annual Report (Appendix E.13 of the 2024 Annual Report), CIRNAC recommended: a) List the concentration range of the melanterite measured in the waste rock samples; b) Correlate SFE iron and sulphate concentrations for waste rock samples with low paste pH; and c) Evaluate if melanterite dissolution could provide the required acidity.	(R-24) CIRNAC has retained last year's comment while the Pit water Quality model is being developed. Please provide a schedule for completing the Pit Water Quality Model.	The updated Pit Water Balance and Water Quality Model was submitted with the latest update to the ICRP on December 10, 2025, and is included as Appendix E.10.1 of the 2025 QIA-NWB Annual Report for Operations. Baffinland considers this item (R-24) closed.

	Subject	Reviewer's Detailed Comment	CIRNAC Recommendations	Baffinland's Response
		Baffinland's response indicated: "Baffinland has engaged Stantec to develop a comprehensive Pit Water Quality Model that will take into consideration all aspects of the listed recommendation, including modelled Melanterite concentrations and potential dissolution mechanisms. The Pit Water Quality Model will evaluate all inputs and considerations affecting ARD potential and other mechanisms that could contribute to the dissolution of metals from the mine ore and wastes and the resulting short and long term effects on water quality."		
R-25	Management Plan Updates – Baffinland Spill Contingency Plans	Section 9.2 of the Annual Report and Table 9.1 address Baffinland management plan updates, regarding Annual Report condition Schedule B, Item C, iii. Table 9.1 indicates that no updates were provided for the three Spill Contingency Plans associated with the operation, which include the: Spill at Sea Response Plan (2015); Spill Contingency Plan (2021); and Exploration Spill Contingency Plan (2021). Table 9.1 indicates that the site Spill Contingency Plan (2021) may be reviewed and revised if applicable in 2025. A review of Baffinland spill data via the Northwest Territories and Nunavut Spill Database was conducted to review all available spill data since 2010, and all available spill data from 2021 to present. There were 44 spill events noted for the period of 2021 to present. In relation to 'Product Spilled', 36 of the 44 spills (82%) constituted categories of 'Other', 'Wastewater/Impacted Water' and 'Petroleum – Fuel Oil (jet A, diesel, turbo A, heat)'. In relation to 'Spill Cause' data, 24 of the 44 spills (55%) were caused by 'Breakage' (6), 'Other' (3) and 'Unknown Cause' (5). The current Spill Contingency Plan (2021) does not appear to address all spill scenarios related to the currently understood spill risks for the mine site. As an example, the current Spill Contingency Plan (2021) does not identify 'Wastewater/Impacted Water' as a key spill substance nor does it include this substance under spill scenarios and response protocols of Section 8. While the data extracted from the Spill Database was not validated by CIRNAC, these data trends are considered to be a reasonable snapshot of spill activity. These details are provided as justification context for Baffinland to consider future updates to the Spill Contingency Plan(s) which should address realistic spill risk scenarios that are noted by data trends, in addition to risk assessment and other forms of analysis that inform the Spill Contingency Plan(s). For all spill scenarios outlined in the Spill Contingency Plan (2021) Section 8, preventive actions that can mitigate trending spill risks from occurring should also be added to compliment spill response protocols.	(R-25) CIRNAC recommends that the Spill Contingency Plan(s) include prevention measures and response protocols related to known or trending spill risk scenarios based on review of site spill data (e.g., Wastewater / Impacted Water) to more thoroughly satisfy the intent of Annual Report conditions Schedule B, Item C, i-iii.	Baffinland acknowledges CIRNAC's recommendation and will evaluate whether spills scenarios specific to potential trending spill risk scenarios such as waste water releases will provide further ability for the Project to respond to such releases. It should be noted that the principles within the spill contingency plan are consistent across most spill scenarios. Baffinland will consider CIRNAC's comment in the next update of the Spill Contingency Plan. Baffinland considers this item (R-25) closed.

	Subject	Reviewer's Detailed Comment	CIRNAC Recommendations	Baffinland's Response
R-26	Risk-Based Screening Criteria for Groundwater Monitoring	CIRNAC has provided recommendations for Risk-Based Screening Criteria for Groundwater Monitoring in 2023 (R-16 following review of the 2022 Annual Report), and 2024 (R-14 following review of the 2023 Annual Report). These past recommendations are considered to be not addressed. The following data gaps are noted: - A different risk ranking criteria has been applied for the Milne Port and Mine Site. Discrepancies within the ranking system have not been addressed. - Baffinland has acknowledged increasing trends in surface water bodies which should be considered changing conditions which requires a reanalysis of the ranking system. Baffinland has not yet provided the test-pit coordinates and rationale on how they are sufficient to characterize groundwater conditions across the entire WRF.	(R-26) Past Recommendations from CIRNAC are re-iterated below: a) Provide additional rationale as to how facilities are scored and how the levels of classification are chosen. If based on the ranking criteria used in Knight Piésold (2024b) the landfill facility and hazardous waste berm facility are considered medium risk, then groundwater monitoring should be implemented at all medium risk facilities. Furthermore, risk ranking methodologies between Milne Port and the Mine Site differ. Provide rationale for this discrepancy. Based on the proximity of the Ore Stockpile to the freshwater river to the west and marine environment to the north, groundwater monitoring and an expanded surface water monitoring network is recommended. b) Provide additional rationale on why the risk ranking has not been reevaluated following the identification of various changing conditions including increasing trends related to mine impacts, potentially leaking waste rock facility collection pond liner, increasing trends due to the emulsion plant, etc. c) Provide additional detail regarding the 2021 test pit program, including test pit locations, test pit logs and rationale on why two test pits are deemed to be sufficient for assessing the presence of groundwater in an area over 50 hectares. Rationale should also be provided for why the use of a drill rig for monitoring well installation within the WRF was not followed. CIRNAC recommends Baffinland address these outstanding recommendations by	Baffinland notes that the matters raised under this recommendation were previously addressed in Baffinland's October 15, 2025 submission to the Nunavut Water Board, including the response to outstanding items under 2023 (R-14). The groundwater risk screening approach was developed as a site-specific tool to help determine where groundwater monitoring may be warranted in a continuous permafrost environment, where the primary potential pathway of concern is shallow seasonal active-layer flow to nearby surface water bodies, rather than use of groundwater itself as a receptor. At the Mine Site, facilities were scored based on source material aquatic toxicity, contaminant mobility, soil type, hydraulic gradient, proximity to the nearest receptor, and the presence or absence of secondary containment. Total scores ranged from 4 to 16, with low risk = 4 to 6, medium risk = 7 to 11, and high risk = 12 to 16. These classifications were intended as a screening and prioritization tool to support professional judgment; they were not intended to require automatic groundwater monitoring at every facility within a given category. Accordingly, although the landfill facility and hazardous waste berms were classified as medium risk, they were selected for groundwater monitoring because they represented the highest-priority locations based on site history, program continuity, and specific infrastructure concerns, including liner damage identified at HWB-1. With respect to Milne Port, the risk ranking methodology was adapted from the Mine Site approach to reflect differences in site conditions and available data. Baffinland considers these differences to be an appropriate site-specific refinement of the same overall risk-based approach, rather than a discrepancy in methodology. With respect to the Ore Stockpile, Knight Piésold's March 26, 2024 assessment assigned the facility a score of 11, which falls within the medium risk category and did not warrant inclusion in the groundwater monitoring program. Similar to the WRF, Baffinland does not consider a conventional groundwater monitoring well network to be warranted at the Ore Stockpile because the stockpiled ore mass is itself of sufficient thickness to remain frozen through the open water season, as evidenced operationally by the need to rip frozen ore with dozers prior to loading. Under these conditions, the most relevant potential pathway is limited shallow active-layer interaction at the margins, not sustained groundwater migration at depth. Any seasonal runoff or shallow seepage is captured through the existing ditching which was engineered and designed to be grounded within the facilities permafrost. The ditching systems for facilities are graded so that pooling does not occur, which could have the potential to destabilise the base permafrost. Pooling and containment of facility water only occurs within the lined ponds. The SNP and surface water quality monitoring locations associated with facilities effectively monitor for potential shallow sub surface seepages if they should occur. In addition, the Marine Monitoring Program comprehensively evaluates potential impacts that the current SNP and surface water monitoring network may fail to detect.

	Subject	Reviewer’s Detailed Comment	CIRNAC Recommendations	Baffinland’s Response
			October 15, 2025 (i.e. 90 days from this review).	b) Baffinland acknowledges that the risk screening approach should be reviewed where site conditions change in a way that may materially affect the potential for contaminant release, transport, or exposure to receptors. However, Baffinland does not consider that every increasing trend or site observation necessarily requires immediate revision of the ranking framework or broad expansion of the groundwater monitoring program. Rather, review is most appropriately focused on conditions that indicate a credible and sustained potential for subsurface seepage to migrate through the active layer and affect nearby receptors. Baffinland maintains that parameters already being effectively tracked through existing surface water, seepage, SNP, CREMP, or other facility-specific monitoring programs do not, on their own, justify expansion of a conventional groundwater monitoring network where hydrogeologic conditions do not support that as the most meaningful monitoring tool. Compounds of concern associated with the emulsion plant area, including nitrate and ammonia, are already being tracked through targeted surface water investigations and follow-up actions. Similarly, for the WRF collection pond, seepage monitoring and suitable controls were implemented during the 2025 operating season, and liner performance will continue to be monitored, with repairs or other corrective measures implemented, as warranted, to maintain the intended function of the containment system. No seepage was observed in 2025 from the WRF liner c) As previously reported in Baffinland’s October 15, 2025 response, the 2021 test pit investigations within the WRF area did not identify measurable groundwater. In addition, quarterly WRMP QA/QC reporting has confirmed that, following implementation of the 4 m non-acid generating (NAG) waste rock cap over 85% of the facility, frozen conditions are maintained year-round within the WRF profile and remain well above the original ground surface. In addition to supporting PAG management, this substantially limits the potential for waste rock contact water or other associated constituents to migrate into the seasonal active layer or to support sustained subsurface seepage migration. Accordingly, Baffinland does not consider additional test pits or installation of conventional groundwater monitoring wells within the WRF to be necessary or technically justified at this time. Baffinland considers the more appropriate and informative lines of evidence to be the existing seepage monitoring, routine visual inspections, thermistor data confirming frozen conditions within the WRF profile, and receiving environment monitoring through the SNP and CREMP programs. Baffinland considers the preceding items (R-26, a-c) closed.

	Subject	Reviewer's Detailed Comment	CIRNAC Recommendations	Baffinland's Response
R-27	Waste Rock Management (WRF)	Following review of the 2022 Annual Report, CIRNAC made the following recommendations in 2023 (R-08) pertaining to Waste Rock Management at the WRF: <i>"a. Provide:</i> <i>i) Operational details and figures on waste rock placement (e.g. how and where, etc.) to allow for comparison of actual activities versus requirements of the Waste Rock Management Plan.</i> <i>ii) Cumulative information on waste rock stored to date.</i> <i>iii) Additional supporting information for Baffinland's conclusion that 17% of seepage samples from the Waste Rock Facility (WRF) being acidic is not an issue for concern.</i> <i>b. Consider the following as part of that process to better inform WRF performance:</i> <i>i) Measurement of dissolved concentrations in addition to total concentrations.</i> <i>ii) Examination of trends for metals and metalloids of environmental concern. Several of these metals and metalloids reported total concentrations greater than the detection limit and are possibly associated with neutral mine drainage from the WRF. These include dissolved aluminium, iron, manganese, cadmium, chromium, copper, lead, mercury, nickel, selenium, and zinc</i> <i>c. Investigation of total dissolved solids concentrations well above 1000 mg/L which in the absence of explained alternate source of salinity suggests the waste rock may be a significant point source of salinity and potential adverse effects on revegetation of the final landform at closure and what mitigation measures need to be in place.</i> <i>d. Provide a comment about the amount of potentially acid generating material (PAG) remaining well above expected levels as this has potential WRF construction implications, particularly at closure (i.e. greater than anticipated volume may require significantly greater cover thickness, etc)."</i> Following a review of historical CIRNAC recommendations (See R-01 of this report), it was noted that this recommendation has only been partially addressed. The following outstanding items were noted in reference to the 2023 Recommendations above: For recommendation a), all sub-recommendations except iii) are considered addressed;	(R-27) CIRNAC recommends: a) Baffinland provide additional supporting information for Baffinland's conclusion that 17% of seepage samples from the Waste Rock Facility (WRF) being acidic is not an issue for concern. b) Baffinland provide an examination of trends for metals and metalloids of environmental concern for the WRF, including figures. Several of these metals and metalloids reported total concentrations greater than the detection limit and are possibly associated with neutral mine drainage from the WRF. These include dissolved aluminium, iron, manganese, cadmium, chromium, copper, lead, mercury, nickel, selenium, and zinc. c) Baffinland complete an investigation of total dissolved solids concentrations above 1000 mg/L at the WRF which in the absence of explained alternate source of salinity suggests the waste rock may be a significant point source of salinity and potential adverse effects on revegetation of the final landform at closure. It is also recommend(s) that Baffinland provide mitigation measures for the source of salinity. CIRNAC recommends Baffinland address these outstanding recommendations by October 15, 2025 (i.e. 90 days from this review).	Baffinland notes that the matters raised under this recommendation were previously addressed in Baffinland's October 15, 2025 submission to the Nunavut Water Board, including the response to outstanding items under 2023 (R-08). For ease of review, Baffinland provides the following additional clarification. a) Additional supporting information regarding the conclusion that 17% of WRF seepage samples being acidic is not an issue of ongoing concern The observation that approximately 17% of WRF seepage samples were acidic related to localized seepage conditions observed in 2021, prior to implementation of subsequent waste placement and ARD/ML mitigation measures under the Phase 1 Waste Rock Management Plan. As previously reported, ongoing placement of non-acid generating (NAG) waste rock in accordance with the approved waste placement strategy resulted in progressive improvement in seepage quality, such that seepage samples collected since 2022 have been neutral. This improvement is supported by the WSP 2020–2022 Waste Rock Geochemistry assessment, which documented increasing pH and decreasing concentrations of key parameters, including zinc, nickel, copper, iron, and sulphate. These trends demonstrate that the acidic seepage observed in 2021 was localized and has since been effectively mitigated through the waste placement and ARD management measures implemented at the WRF. Baffinland therefore considers the concern regarding acidic seepage to have been addressed through both implementation of mitigation measures and multiple subsequent years of neutral seepage monitoring results. b) Examination of trends for metals and metalloids of environmental concern Baffinland acknowledges CIRNAC's request for additional trend evaluation for metals and metalloids of environmental concern in WRF seepage. However, Baffinland does not agree that the reporting of total concentrations above analytical detection limits, in itself, indicates an emerging water quality issue at the WRF. Mary River site geology includes naturally mineralized lithologies, and it is therefore not scientifically appropriate to interpret detections above laboratory reporting limits as evidence of mine-related impact without considering the full geochemical context, including dissolved versus total concentrations, temporal trends, spatial patterns, and comparison to applicable action levels and regulatory criteria. The WRF QA/QC Monitoring Plan, implemented under the approved Phase 1 Waste Rock Management Plan, establishes the thresholds and response actions applicable to seepage monitoring results. Under that framework, the presence of a detectable concentration does not, on its own, trigger a conclusion of concern; rather, results are evaluated against defined action levels and in the context of overall WRF performance. In addition, dissolved concentrations were added to the seepage analytical suite in

	Subject	Reviewer’s Detailed Comment	CIRNAC Recommendations	Baffinland’s Response
		For recommendation b), ii) was not provided for the WRF; and Recommendation c) is considered not addressed.		2025 and will support more refined interpretation of seepage chemistry moving forward. Baffinland will continue to use ongoing monitoring data to evaluate temporal trends for key seepage parameters, including metals and metalloids identified by CIRNAC, and to inform future WRF geochemical evaluation and closure planning. c) Investigation of elevated TDS and potential implications for closure With respect to CIRNAC’s concern regarding total dissolved solids (TDS) concentrations above 1000 mg/L, Baffinland acknowledges that elevated TDS has been observed at some localized seepage points at the WRF. However, these results were limited to localized seepage expressions and were not representative of overall WRF pond water quality or downstream receiving environment conditions. On that basis, Baffinland does not agree that these isolated historical results demonstrate that the WRF is a significant ongoing source of salinity or that they support an inference of likely adverse effects on closure performance. Baffinland further notes that the elevated TDS observations were associated with earlier localized seepage conditions prior to implementation of enhanced ARD/ML mitigation measures. Following placement in 2024 of the 4 m non-acid generating (NAG) waste rock cap over 85% of the WRF, the surface conditions that contributed to those historical localized seepage results have been buried beneath the cap. Ongoing WRF Instrumentation Monitoring has also confirmed that frozen conditions are maintained year-round within the WRF profile well above the original ground surface, which substantially limits the potential for continued interaction between those historical source areas and the active layer. Accordingly, Baffinland does not consider a separate salinity investigation or development of additional mitigation measures to be warranted at this time. Baffinland will continue to evaluate WRF performance through the approved monitoring and QA/QC framework, and any future need for additional assessment would be based on evidence of a broader or ongoing issue rather than on a small number of historical localized seepage results. Reference note: Relevant context includes Baffinland’s October 15, 2025 response to outstanding CIRNAC recommendations, the WSP 2020-2022 Waste Rock Geochemistry assessment, the WRF QA/QC Monitoring Plan, and quarterly WRMP QA/QC reporting confirming implementation of the 4 m NAG waste rock cap over 85% of the WRF and maintenance of frozen conditions within the facility profile. Baffinland considers the preceding items (R-27, a-c) closed.

To: Nunavut Water Board, CIRNAC
From: Baffinland Iron Mines Corporation
Title: **2024 NWB/QIA Annual Report for Operations Intervenor Comments**
Date: October 15, 2025

2024 NWB QIA Annual report for operations – CIRNAC Comment R.1

Please find attached Baffinland's response to CIRNAC's first recommendation (response requested by October 15): **1. Review of Previous CIRNAC Annual Report Recommendations (2021 to 2023)**

Recommendation:

(R-01) CIRNAC recommends Baffinland address all outstanding "Not Addressed" or "In Progress" recommendations by October 15, 2025 (i.e. 90 days from this review). Failure to do so will result in non-addressed recommendations being forwarded to field operations to be further assessed during compliance audit(s).

The attached document (Table A4.1) provides a comprehensive response to the items listed in CIRNAC's provided "Table A – Summary of Previous CIRNAC Annual Report Review Recommendations (2021 to 2023)"

In the attached response to this summary table, Baffinland has indicated (1) how the previous recommendation(s) has been fulsomely responded to and where to find that response; (2) expanded on previous responses with additional clarifying or summation statements; or (3) indicated that ongoing reporting (where applicable) will be presented in the 2025 NWB-QIA Annual Report for Operations, due March 31, 2026.

We trust that the attached document will fully resolve these previous recommendations for CIRNAC and the Board. We remain committed to transparency and responsible operations, and welcome any further discussion regarding these items at NWB or CIRNAC's convenience.

Sincerely,

A handwritten signature in black ink, appearing to read "Lou Kamermans".

Lou Kamermans
Senior Director, Sustainable Development

cc: Karén Kharatyan, Robert Hunter, Richard Dwyer (NWB), Jeremy Fraser (CIRNAC)

Attachments:

- Attachment 1: Table A4.1: Response to CIRNAC Comments on Baffinland's 2024 QIA-NWB Annual Report for Operations (2021-2023)
Attachment 2: 250731 ESCA Update

APPENDIX E.13.1A

Baffinland's October 15 Response to CIRNAC R-01

Attachment 1**Table A4.1 - Response to CIRNAC Comments on Baffinland's 2024 QIA-NWB
Annual Report for Operations (2021-2023)**

Table A4.1: Response to CIRNAC Comments on Baffinland’s 2024 QIA-NWB Annual Report for Operations (2021-2023)

Reporting Year	Rec. #	Topic	CIRNAC Recommendation	Due Date Assigned by CIRNAC	Notes	Baffinland’s Response
2021	R-03	Groundwater Monitoring at Landfill Areas	Implement the Groundwater Monitoring Program recommendations, or propose alternative actions to better characterize the impact the landfill has on surrounding groundwater and groundwater conditions at the four additional areas identified as potentially impacted.	15-Oct-25	Baffinland has indicated new well installations are planned. However, this has not yet been completed. As such this recommendation is considered in progress until the updated groundwater monitoring network can be reviewed. See 2025 CIRNAC recommendation R-26.	As will be described in Baffinland’s 2025 Annual Groundwater Monitoring Report, new wells have been installed in 2025, and ongoing analysis and findings from the groundwater network will be reported in the 2025 NWB QIA Annual Report for Operations on March 31, 2026. Baffinland includes the annual Groundwater Monitoring Report as an appendix to annual reports each year, which provides a full summary of the finding and status of the annual groundwater program.
2021	R-05	Mitigation measures for future unauthorized discharges	Once the Mine Site Water Management Plan is approved, the Licensee should take actions as quickly as possible to eliminate future sediment laden water discharges to the project area streams.	15-Oct-25	KM 105 Issues remain, mitigation in progress. See 2025 CIRNAC Recommendation R-18.	Please refer to Table 2.3 of the Annual Report for the current status of items approved under Modification 13, i.e. the Mine Site Water Management Plan. With regard to the KM105 structure, please refer to Baffinland’s response to 2025 CIRNAC Recommendation R-18, submitted to the Board on October 2, 2025. It should be noted that supplemental monitoring IDs that are not within the Water Licence are not associated with licence compliance locations and do not constitute non -compliances. The monitoring data discussed forms verification and adaptative management monitoring data that is used to inform on sedimentation and erosion mitigation measures during Freshet. The FEIS predicted impacts within mine site drainages and Baffinland continues to mitigate them through ongoing improvement to water management infrastructure, snow management and Project drainage while installing erosion and sedimentation controls. All discharge monitoring compliance points were compliant in 2025 with the exception of 1 sample at MS-11 during Freshet which is not attributed to effluent from the facility. Baffinland remains committed to implementing our current mitigations governed by our various applicable management plans, and to implement adaptive management to make improvements, where warranted and where possible. Baffinland’s goal in this instance is to operationally reduce our impacts to as low as reasonably achievable.

Reporting Year	Rec. #	Topic	CIRNAC Recommendation	Due Date Assigned by CIRNAC	Notes	Baffinland's Response
2022	R-01	Sedimentation Management During Freshet	a. Address the approved Mine Site Water Management Plan (MSWMP) to limit future sediment laden water discharges. b. Review procedures outlined in the MSWMP plan and identify changes that are required to prevent future spills. c. Develop and implement a worker training program with the goal to limit sediment- laden water discharges.	15-Oct-25	CIRNAC notes there has been some progress with regards to training and plans. However, spills are still occurring and active erosion was noted during site inspections. As such, improved implementation and management is recommended.	a) Please refer to the response provided above. The long -term Water Management plan continues to be implemented. This year Baffinland focused on the improvements to water management infrastructure within the KM 105 facility. b) Once the measures outlined in Table 2.3 of the 2024 Annual Report are constructed, Baffinland will update and maintain the procedures set out in the applicable operating manuals and Management Plans to support the prevention of future spills. However, it is important to note that Baffinland has consistently updated its Management Plans independent of the status of the items in Table 2.3, as part of its ongoing commitment to spill prevention. c) Baffinland developed in-house Erosion and Sediment Control Awareness training. The Erosion and Sediment Control Training was delivered by Baffinland to a cohort of 127 personnel on site. This cohort consisted of relevant Department Personnel who will, over the course of their employment, find themselves involved in installing, maintaining, or developing ESC controls. A Memo titled 250731 ESCA Update summarizing the training is attached.
2022	R-04	Addition of Mine Haul Road and Tote Road to Bi-Annual Inspections including Assessment of Potential Permafrost Degradation Along These Roads	a. Address CIRNAC 2021 R-04. b. Provide an update on the status of the Long-Term Water Management Plan that was to be developed by Q3 2020. c. Include additional details on the permafrost degradation.	15-Oct-25	See 2025 CIRNAC Recommendation R-17.	a. This item was clearly addressed In Appendix E.12 - BIM Response to 2022 NWB QIA Annual Report for Operations Comments, submitted with the 2023 Annual Report on March 31, 2024. b. An update was provided in the 2024 NWB QIA Annual Report for Operations, and this year Baffinland focused on the improvements to water management infrastructure within the KM 105 facility. Water Quality monitoring results in 2025 have significantly improved, and Baffinland will continue to update regulators through the annual reporting process. c. As per the second 2023 Geotechnical Report, the impact of the [Tote] road on the permafrost was generally limited and mostly occurred during the construction of the road. However, a few visible deficiencies could have adverse effect on the stability of the road embankment and slopes, on traffic safety and on the thickness and condition of the active layer locally. Baffinland continues to perform progressive reclamation on borrow pits on the Tote Road annually and provides an annual schedule and update within the Annual Report. Baffinland is currently working with Nunami Stantec to develop and evaluate methods road and crossing constructions that will minimize impacts to permafrost.
2022	R-05	Omission of Thermal Monitoring Data in 2021 Annual Report	Provide the report that summarizes and interprets the thermal data collected at the Project in 2021 as well as any data for 2022 for review.	15-Oct-25	2025 Recommendations continue to note that thermal data has not been included. See 2025 CIRNAC Recommendation R-05.	Please refer to Appendix E.14.2 of the 2023 NWB QIA Annual Report for Operations, Titled: <i>“Technical Memorandum: Assessment of Instrumentation Data and the Thermal Regime of the Waste Rock Storage Facility at Mary River Mine”</i> . Ongoing results of the thermal regime monitoring will be presented in the 2025 NWB-QIA Annual Report for Operations on March 31, 2026.

Reporting Year	Rec. #	Topic	CIRNAC Recommendation	Due Date Assigned by CIRNAC	Notes	Baffinland's Response
2022	R-08	Waste Rock Management (WRF)	a. Provide: i) Operational details and figures on waste rock placement (e.g. how and where, etc.) to allow for comparison of actual activities versus requirements of the Waste Rock Management Plan. ii) Cumulative information on waste rock stored to date. iii) Additional supporting information for Baffinland's conclusion that 17% of seepage samples from the Waste Rock Facility (WRF) being acidic is not an issue for concern. b. Consider the following as part of that process to better inform WRF performance: i) Measurement of dissolved concentrations in addition to total concentrations. ii) Examination of trends for metals and metalloids of environmental concern. Several of these metals and metalloids reported total concentrations greater than the detection limit and are possibly associated with neutral mine drainage from the WRF. These include dissolved aluminium, iron, manganese, cadmium, chromium, copper, lead, mercury, nickel, selenium, and zinc c. Investigation of total dissolved solids concentrations well above 1000 mg/L which in the absence of explained alternate source of salinity suggests the waste rock may be a significant point source of salinity and potential adverse effects on revegetation of the final landform at closure and what mitigation measures need to be in place. d. Provide a comment about the amount of potentially acid generating material (PAG) remaining well above expected levels as this has potential WRF construction implications, particularly at closure (i.e. greater than anticipated volume may require significantly greater cover thickness, etc).	15-Oct-25	a - Considered all addressed except iii) b - Part i) considered addressed part ii) not provided for WRF c - Not Addressed d - Addressed though QA/QC plan See 2025 CIRNAC Recommendation R-27	a) i, ii) All operational details have been provided to CIRNAC with quarterly WRF Performance reports submitted in 2024, with the (achieved) goal of 85% progressive reclamation of the WRF with at least 4 meters of NAG Waste Rock cover. a) iii) This has been sufficiently answered multiple times (including Appendix E.13 item R.08 of the 2024 QIA-NWB Annual Report for Operations – Responses to 2023 intervener Comments). In summary, the 2021 data where 17% of samples collected being low pH has been effectively mitigated through ongoing placement of NAG on the WRF, according to the placement plan in the PH1 WRMP. This resulted in changes to the seepage quality such that all seepage samples since 2021 have been neutral. Baffinland considers the concern for low pH seepage to be fully mitigated, supported by evidence collected and reported annually since 2022. b) i) Dissolved concentrations have been added to the analysis suite for 2025's seepage monitoring under the WRMP QA/QC Plan and will be provided in the 2025 NWB QIA Annual Report for Operations on March 31, 2026. b) ii) Baffinland acknowledges CIRNAC's recommendation to examine trends for metals and metalloids of environmental concern in seepage from the Waste Rock Facility (WRF). We respectfully note, however, that the observation of total concentrations above analytical detection limits does not, in itself, indicate the presence of neutral mine drainage (NMD). The Mary River site geology comprises naturally mineralized lithologies, including iron formation, metasedimentary, and metavolcanic units containing variable background concentrations of metals. Consequently, the expectation that water quality in WRF seepage should be "below detection" for these parameters is not scientifically appropriate. It should be noted that all Water Quality results remain compliant with Water Licence and MDMER discharge criteria. Baffinland will continue to collect water quality data as part of its ongoing compliance and environmental monitoring programs. This data will also inform future Waste Rock Facility water quality modeling and the commitments outlined in the current ICRP. c) Baffinland acknowledges CIRNAC's observation that total dissolved solids (TDS) concentrations well above 1,000 mg/L have been reported. These elevated results are primarily associated with localized seepage points and are not representative of the overall water quality from the WRF. In addition, several of the higher TDS results correspond to a period when low-pH drainage was observed at the WRF, prior to implementation of the updated Waste Rock Management Plan and enhanced ARD mitigation measures. d) In their 2023 Annual Report intervener Comments, CIRNAC requested that Baffinland, in relation to item d), "Update the ICRP with information on the impact of the increased amount of PAG material on the WRF. Provide the

Reporting Year	Rec. #	Topic	CIRNAC Recommendation	Due Date Assigned by CIRNAC	Notes	Baffinland's Response
						updated ICRP with the next annual report.” Baffinland has since provided an updated ICRP and has fully addressed this item in that submission.
2023	R-02	Sampling Errors and External Lab Errors	a. Investigate the root cause of water quality exceedances for turbidity. b. Continue to ensure that proper sampling procedures in the field and analytical procedures in the laboratory are being followed to help reduce the number of observed exceedances resulting from error, focusing on obtaining and using properly distilled water. c. Issue an Annual Report revision with fulsome result interpretation regarding QA/QC samples and further detail regarding root causation for meaningful follow up actions.	15-Oct-25	See 2025 CIRNAC Recommendation R-15.	The comment has been addressed in Appendix E.13 – BIM Response to Comments on the 2023 QIA-NWB Annual Report for Operations, submitted with the 2024 Annual Report and concerns regarding QA/QC have been superseded by this year’s comment R-15. A complete update to ongoing QA/QC investigations will be presented in the 2025 NWB-QIA Annual Report for Operations on March 31, 2026.
2023	R-05	Omission of Thermal Monitoring Data in 2021 and 2022 Annual Reports	a) Continue with additional instrumentation and monitoring and update thermal analysis including the heat balance and oxygen balance across the WRF. b) Provide flow characteristics of the frozen waste rock mass and see it meets with the design intent. c) Restoration of oxygen probes, barometers and possibly flow meters should be considered (as opposed to abandoning these non-functioning instrumentation). d) Clearly describe all the calibration steps performed for the thermal model, how the calibration was validated, and the kind of sensitivity analysis performed. e) Calibrate the model only with actual historical data. f) Discuss the impact of the small calibration data on the validity of the model results. g) Explain the reason for the difference and if both documents are required as attachments.	15-Oct-25	See 2025 CIRNAC Recommendation R-05.	This recommendation is repeated in R-24 Below – see response to that item please.

Reporting Year	Rec. #	Topic	CIRNAC Recommendation	Due Date Assigned by CIRNAC	Notes	Baffinland's Response
2023	R-07	Confirmation of Permafrost Degradation/ Remedial/ Maintenance Activities	(R-07) CIRNAC recommends that Baffinland: a) Provide the overall action plan for all disturbed areas identified at the existing and historic borrow areas along Tote Road and for the Mine Haul Road, including any new areas identified as part of the roadways since the time of the 2019 Tetra Tech inspection by September 30, 2024. b) Include as part of the overall action plan: i) a condition survey (as per 2023 2nd Geotechnical Inspection Report) along Tote Road to map the most critical locations at risk for permafrost degradation, i.e., trapped surface water areas and short culverts. ii) Replace short culverts with appropriate-sized culverts to address deficiencies of poor drainage.	15-Oct-25	See 2025 CIRNAC Recommendation R-17.	a) This comment has been addressed in Appendix E.13 – BIM Response to Comments on the 2023 NWB QIA Annual Report for Operations, of the 2024 Annual Report. Baffinland continues to perform progressive reclamation on borrow pits on the Tote Road annually and provides an annual schedule and update within the Annual Report. Baffinland is currently working with Nunami Stantec to develop and evaluate methods road and crossing constructions that will minimize impacts to permafrost. b) The overarching plan has not changed since the 2019 Tetra Tech plan, and Baffinland integrates the Tetra Tech observations by priority, into the annual capital projects planning process. i) The annual Geotechnical Inspections completed by a principle WSP Geotechnical engineer, serve as a condition survey of the Tote Road annually. ii) Deficiencies identified during the annual Geotechnical Inspections, are annually assessed and Baffinland is currently working to upgrade design parameters, associated with permafrost interactions, of select crossings along the Tote Road.
2023	R-09	Performance of New Surface Water Management Pond MS-11 at KM105	(R-09) Based on its review of the 2023 Annual Report, and in consideration of comments provided on the 2022 Annual Report (R-11), CIRNAC recommends the following: a) Baffinland should provide details in the 2024 Annual Report concerning the findings of containment failure and remedial measures, including as-built details as per Part D.17, Part G.6 and Schedule D 1.c of the Water Licence. CIRNAC requests that the 2024 Annual Report include evidence that the Engineer of Record (EoR) of the KM105 Pond revisited the design of the seepage grout curtain to ensure it meets the design intent of containing of the surface runoff. CIRNAC requests that the 2024 Annual Report identify the party assigned with responsibility of the facility post seepage remedial work, as the containment embankment is classified as a high potential structure. b) In the 2024 Annual Report, confirm that the TSS removal was in place by freshet of 2024 and provide the results of MS-11 monitoring in the 2024 Annual Report as per Part F.27 of the Water Licence. c) In the 2024 Annual Report, confirm that the installation of the seepage grout curtain, which is intended to reduce seepage through the dam foundation, was initiated and in place prior to freshet 2024.	15-Oct-25	See 2025 CIRNAC Recommendation R-18.	a), b), c) These comments have been addressed in Appendix E.13 – BIM Response to Comments on the 2023 NWB QIA Annual Report for Operations, submitted with the 2024 Annual Report on March 31, 2025, as follows: <i>The implementation of effective mitigation measures to address seepage from the KM105 facility was unsuccessful in 2024 as evidenced by the detection of additional seepage following remedial efforts at the facility over the winter.</i> <i>In Q1 and Q2 of 2024 Baffinland undertook to install a grout curtain upstream of the km 105 dam and km 104.5 sedimentation pond, in order to prevent flow beneath the pond liner and resulting seepage through the dam. The work was carried out in accordance with the Engineer of Record's (Tetra Tech) IFC design drawings.</i> <i>By May 14, 2024, a total of 500.36 m3 of grout had been injected in approximately 29 holes (18 holes completed per design and 11 holes partially filled), representing more than 10 times the planned grout volume consumed in 15% of the drill holes. The work had to stop because of the onset of freshet and the likelihood that further grout injection would be washed away by subsurface freshet water flow. A workshop was held between Baffinland and Tetra Tech on July 2, 2024, wherein it was determined that the best path forward was to cease the grout curtain approach and focus on water management measures within the km 105 infrastructure valley. Final as-builts on the project are not complete at this time.</i> <i>MS-11 is not an active monitoring location currently due to seepage experienced from the dam. Proxy sample locations were reported on a monthly basis as per required frequencies and are included within the 2024 Annual Report. An SNP modification request has been submitted with the 2024 Annual Report to relocate</i>

Reporting Year	Rec. #	Topic	CIRNAC Recommendation	Due Date Assigned by CIRNAC	Notes	Baffinland's Response
						MS-11 to the identified monitoring location downstream of all Km 105 water management infrastructure. Baffinland provided regulators with an update report on January 22, 2025, detailing the full summary of activities related to the KM105 Pond, and mitigation measures planned for 2025. This report is also included in the 2024 NWB and QIA Annual Report for Operations (Appendix E.8.3).
2023	R-10	Performance of P-SWD-3 Surface Water Collection Ditch	(R-10) In consideration of the 2023 Annual Report and comments provided on the 2022 Annual Report (R-12), CIRNAC recommends that Baffinland: a) Continue to monitor the P-SWD-3 to ensure that the improvement work was effective (if it was reconstructed) and that it meets the required intent to convey surface runoff, as part of the follow up action. Provide a detailed update regarding efficacy of the redesign in the 2024 Annual Report. b) Implement the recommendation in the 2023 Annual Geotechnical Inspection Reports which include: i) Redesign and reconstruct the ditch to drain the large amount of surface water arising from the snow stockpile located to the north-east. ii) A perimeter diversion berm be provided around the snow stockpile area and that the surface water generated by the melting snow be conveyed to the P-SWD-3 ditch in a separate new drainage ditch. iii) Ditch reconstruction should consider reinstalling a culvert beneath the access road to the snow stockpile to the correct invert levels. iv) A rock-fill check dam be installed at the discharge point of the upgraded ditch. c) Assess the thermal and freeze/thaw stability of all drainage ditches and its slopes to ensure the ditches meet the design intent of conveying surface runoff.	15-Oct-25	See 2025 CIRNAC Recommendation R-21.	a), b) Although there are deficiencies identified in the annual Geotechnical Inspections, the ditch continues to function to convey and divert water away from the PSC pad. Water quality monitoring is conducted through the Water Licence SNP monitoring requirements and the SWAEMP, with water quality results showing no adverse effects from design exceptions. Baffinland continues to review recommendations made in the annual Geotechnical Inspections, and implementing corrective actions on a priority basis. Baffinland will continue to report on all construction activities in response to Geotechnical Inspection recommendations in future NWB QIA Annual Reports for Operations. c) Baffinland feels the requested specific assessment is not necessary, as we complete regular performance monitoring on all facilities, and if any performance issues are noted, we implement appropriate adaptive measures protective of the receiving environment.
2023	R-14	Risk-Based Screening Criteria for Groundwater Monitoring	(R-14) CIRNAC recommends that Baffinland: a) Provide additional rationale as to how facilities are scored and how the levels of classification are chosen. If based on the ranking criteria used in Knight Piesold 2024b the landfill facility and hazardous waste berm facility are considered medium risk, then groundwater monitoring should be implemented at all medium risk facilities. b) Provide a rationale as to why select locations (e.g., B1) were excluded from the review. A waste oil spill of 500L occurred outside of secondary containment within 74 m of a water body. Using the nearby Port Site Complex as a reference with the upgraded proximity to receptor (<100m) and no containment present score, would score the site at 14 and rank it as high risk. c) Provide additional detail regarding the 2021 test pit program, including test pit locations, test pit logs and rationale on why two test pits are deemed to be sufficient for assessing the presence of groundwater in an area over 50 hectares. Rationale should also be provided for why the use of a drill rig for monitoring well installation within the WRF was not followed.	15-Oct-25	Considered not addressed. See 2022 R-16, above and 2025 CIRNAC Recommendation R-26. Different ranking criteria have been applied across the Site. Further, Baffinland has not yet provided the test pit coordinates and rationale on how they are sufficient to characterize groundwater conditions across the entire WRF.	These items were fully addressed in Appendix E.13 – BIM Response to Comments on the 2023 NWB QIA Annual Report for Operations, submitted with the 2024 Annual Report on March 31, 2025: a) <i>The groundwater risk assessment criteria were developed to guide Baffinland as to under what conditions it was appropriate to conduct groundwater monitoring of a given facility/area, when to continue or stop groundwater monitoring, and when to remediate or mitigate groundwater contamination or mobilization. The scoring system recognizes that there are no groundwater users in a permafrost environment, and thus no established regulatory criteria for groundwater quality. The main risk of groundwater impacts is the potential to seep into nearby surface water bodies and potentially affect aquatic life. It considers multiple inputs to assist in determining the risk at each facility/location. The method to determine the scoring risk was to assess factors that may contribute to groundwater impacts such as source material toxicity and secondary containment. Factors that influence the transport of contaminants were also considered including hydraulic gradient, soil type and proximity to receptors. It is believed that the methods in assessing the risk at each are representative for the facilities/areas at the Mary River site.</i>

Reporting Year	Rec. #	Topic	CIRNAC Recommendation	Due Date Assigned by CIRNAC	Notes	Baffinland's Response
						Although the landfill facility and the hazardous waste berms are considered a medium risk, they are identified as the highest risk for groundwater impacts within the Mine Site, therefore Baffinland has initiated a groundwater monitoring program at these facilities. b) This was fully addressed in Appendix E.13 – BIM Response to Comments on the 2023 NWB QIA Annual Report for Operations, submitted with the 2024 Annual Report on March 31, 2025 If a spill happens to be in proximity of ongoing groundwater monitoring wells or there is a significant risk to groundwater, then applicable monitoring will be considered. Generally, incidents are identified, responded to, and remediated within 24-hours. This expedited time will limit the risk and potential for any groundwater impacts as a result of spills. It is important to note that the active layer at the Project is completely frozen for the majority of the year (October to June) and that main groundwater aquifer is sealed below significant permafrost depth. Historically across the mining industry, groundwater is not a constituent of concern in high arctic permafrost environments, and was specifically excluded from the list of Valued Ecosystem Components during the Environmental Impact Review for the Project. The Final EIS states in Volume 7, Appendix 7A: “... “water quality” has been identified as a VEC for this EIS. The water component of “water quality” refers to surface water (rivers, streams, lakes) and groundwater; however, groundwater quality is generally not considered to be at risk in the Project area because the extensive permafrost layer acts as an impermeable barrier eliminating/limiting potential migration of contaminants into the groundwater located below.” c) The Mary River Project is in a zone of continuous permafrost with a total depth of Permafrost extending to depths in excess of 600 meters. Due to this fact, there are no areas of discontinuous permafrost that would require additional test pits to prove the presence of permafrost over a larger area like the WRF. Because the permafrost has effectively aggregated into the Waste Rock Mass itself, there will be no mobilization of active layer below the original ground surface, and therefore no benefit to installing groundwater wells. Further details will be provided in a conceptual groundwater model in the 2024 Groundwater Monitoring Report, expected to be submitted with the 2024 NIRB Annual Report.
2023	R-18	Alternative Remediation Methods for Hydrocarbon-Impacted Soils	(R-18) CIRNAC recommends that Baffinland: a) Prioritize examining alternative remediation methods over the development of additional Landfarm facilities beyond the ones under construction or already planned. b) That the 2024 Annual Report provide further detail related to this initiative.	15-Oct-25	See 2025 CIRNAC Recommendation R-19.	Baffinland has provided feedback on similar recommendations in the ICRP Revision 6 and WRF Thermal Model Review Comments Responses submitted August 25, 2025: <i>Baffinland continues to operate the landfarm cells at the Mary River Project. While standard industry approaches have been reviewed, site-specific data required to identify the most effective treatment strategy is still being fully assessed with support from external expertise. Scarification is currently conducted onsite to promote remediation; however, Baffinland is evaluating</i>

Reporting Year	Rec. #	Topic	CIRNAC Recommendation	Due Date Assigned by CIRNAC	Notes	Baffinland's Response
						<i>options to optimize equipment use, nutrient amendments, permeability, and other site-specific factors.</i> <i>In parallel, Baffinland is also investigating alternative industry practices for the management and potential disposal of hydrocarbon-contaminated soils. The project team is assessing the benefits and feasibility of future remediation and disposal methodologies to ensure effective and responsible management of these materials.</i>
2023	R-19	Waste Rock Facility QAQC Monitoring Plan	(R-19) CIRNAC recommends that: 20 a) Water quality samples should be analyzed per the Group 7 parameters listed in Schedule I, Table 12 of the WATER LICENCE NO: 2AM-MRY1325, which includes both total and dissolved parameters. b) Flow rates should be measured from seepages and collection ditches to refine the water balance and support the geochemical review of the WRF performance.	15-Oct-25	See 2025 CIRNAC Recommendation R-20.	a) Baffinland has added dissolved metals to the suite of parameters monitored in water quality collected from the WRF in 2025. Results will be presented in the 2025 NWB QIA Annual Report for Operations on March 31, 2026. b) As responded in Appendix E.13 – BIM Response to Comments on the 2023 NWB QIA Annual Report for Operations, submitted with the 2024 Annual Report on March 31, 2025: <i>Flow rates are extremely difficult to measure in the field when there is an undefined flow as there is in the seepages and water collection ditches around the WRF.</i> <i>Baffinland investigated the opportunity and potential for accurately measuring the flow rates of these areas, but determined that because of the reasons described above, it is not feasible. Furthermore, all flows are collected in the WRF Pond and accounted for in the discharge monitoring for MS-08.</i>
2023	R-20	Reported Spills	(R-20) CIRNAC recommends that Baffinland: a) Continue to report on and address root causes and related corrective actions for spills in future reports. b) Update the Spill Contingency Plan to include root cause findings as a key aspect of the Plan (including methodology for site staff to follow), and to consider staff training to undertake root cause spill investigations. c) Provide information on what measures are being taken to improve the surface water management infrastructure deficiencies as well as any immediate effective corrective actions taken to mitigate reoccurring spills.	15-Oct-25	See 2025 CIRNAC Recommendations R-13, R-16 and R-25.	This comment has been addressed in Appendix E.13 – BIM Response to Comments on the 2023 NWB QIA Annual Report for Operations, submitted with the 2024 Annual Report on March 31, 2025: a) <i>Baffinland will continue to investigate and report the root causes of all reportable incidents, as well as corrective actions.</i> b) <i>Baffinland has an internal process for the investigation of all incidents, including reportable spills, that includes a root cause analysis. It would not be appropriate to duplicate the requirement for the SCP, but we can refer to this process in the next edit of the SCP.</i> c) <i>Corrective actions for each incident are outlined in the spill follow up report that is submitted to CIRNAC and QIA.</i> All follow-up reports (including corrective actions) are included in the NWB QIA Annual Reports for Operations (Appendix E.8.3)

Reporting Year	Rec. #	Topic	CIRNAC Recommendation	Due Date Assigned by CIRNAC	Notes	Baffinland's Response
2023	R-24	Thermal Monitoring and Modeling	(R-24) CIRNAC recommends that Baffinland: a. Continue with additional instrumentation and monitoring and update its thermal analysis to include the heat balance and oxygen balance across the WRF. b. Provide flow characteristics of the frozen waste rock mass and ensure that it meets the design intent. c. Consider restoring oxygen probes, barometers and possibly flow meters (as opposed to abandoning these non-functioning instrumentation). d. Clearly describe all the calibration steps performed for the thermal model, how the calibration was validated, and the kind of sensitivity analysis performed. e. Calibrate the model only with verifiable historical data. f. Discuss the impact of the small amount of calibration data used on the validity of the model results. g. Explain the reason for the differences in the documents presented and if both documents are required as attachments.	15-Oct-25	See 2025 CIRNAC Recommendation R-05.	This comment has been addressed in Appendix E.13 – BIM Response to Comments on the 2023 NWB QIA Annual Report for Operations, submitted with the 2024 Annual Report on March 31, 2024, and concerns regarding thermal monitoring data have been superseded by this year's comment R-05. Also, Baffinland notes that this a duplicate (copy/paste) recommendation of 2023 R-05. a) <i>Baffinland provided a WRF instrumentation update in its 2023 QIA-NWB Annual Report for Operations and will provide an update in its 2024 annual report, and subsequently include instrumentation updates annual in future annual report. The 2024 update will continue to include the plan for recovery of any “down” thermistors, and whether or not new instrumentation is planned for the coming year. This annual review and update to the WRF instrumentation and installation plan has been incorporated into the QIA- NWB Annual Report to ensure monitoring of the WRF performance is regularly communicated to regulators</i> <i>Baffinland has completed the installation of three (3) additional thermistors, plus has replaced one thermistor that was previously down. An installation update will be provided in the 2024 QIA-NWB Annual Report.</i> <i>Baffinland has not planned for installation of additional VWPs in the WRF for 2024, as outlined in the 2023 QIA-NWB Annual Report. The VWPs installed have been dry and in sub-zero temperatures at all times and after discussion with Baffinland's third-party consultant, it was determined additional VWPs would not be necessary at this stage.</i> b) <i>The improvement in water quality over time demonstrates that seepage through the bulk of the pile is limited, consistent with the pile sustaining freezing conditions during all times, except for the upper active zone subject to seasonal freezing and thawing. This validates the design intent of minimizing ARD/ML by limiting water flow through the pile and slowing the rate of sulphide oxidations due to freezing conditions.</i> c) <i>Baffinland has not planned for installation of additional oxygen probes in the WRF for 2024, as outlined in the 2023 QIA-NWB Annual Report. Through discussion with Baffinland's third-party consultant and subject matter expert on waste rock management, new oxygen sensors are not currently being considered for installation at the WRF given their poor success for continued operation. Thermistors installed in target locations at the WRF will provide the necessary monitoring to confirm the deposition strategy is promoting freezing as per the design intent.</i> d) <i>The 2D model cross-section has been defined to align with the locations of boreholes BH1, BH2 and BH3, which contain thermistor strings. The model calibration process consists of adjustments to the model inputs until the computed temperature profiles at different times are in reasonable agreement with trends measured in the reference strings. Because of the large-scale of the 2D model geometry, the model calibration focuses on replicating the pile's general thermal regime rather than localized trends like the temperature variation observed in BH1, which must be assessed separately. Rock fill has been progressively placed on top of the pile in general and, specifically, on top</i>

Reporting Year	Rec. #	Topic	CIRNAC Recommendation	Due Date Assigned by CIRNAC	Notes	Baffinland's Response
						and adjacent to BH2 and BH3 that affected the thermal regime measured along those strings, hence the model geometry had to be adjusted as part of the calibration process to account for placement of rock fill in those areas. Changes in rock fill elevation in the pile is tracked through sequential surveys that are conducted routinely. The timing of rock fill placement in the model (i.e., date when the model geometry was adjusted), and the associated placed rock fill temperature were the model inputs that had the most impact on the model results. The calibration process tested rock fill placed at different dates between two (2) surveys and the final rock fill deposition schedule summarized in Table 3 of Appendix A2 of the Waste Rock Management Plan – June 2023 Through September 2026 Report (Thermal Model and Assessment of Conceptual Summer Deposition Strategies for the Waste Rock Storage Facility at Mary River Mine Technical Memorandum) was the one that resulted in the best match with the measured data in BH1, BH2 and BH3. In addition to the timing of rock fill placement in the model geometry, sensitivity cases also tested variations in the constant temperature boundary condition at the base of the 2D model geometry, with the final value of -7.5°C resulting in a more balanced agreement between measured data in BH-1, BH-2, and BH-3. e) Validation of the calibrated parameters was through comparisons of model results with measured data from the reference thermistor strings. The comparison plots of predicted vs measured temperatures presented in Section 5.0 of Appendix A2 of the Waste Rock Management Plan – June 2023 Through September 2026 Report (Thermal Model and Assessment of Conceptual Summer Deposition Strategies for the Waste Rock Storage Facility at Mary River Mine Technical Memorandum) are for calibrated parameters and, in general, demonstrate that the model has been able to follow general trends in the pile. f) See above answer to e). g) Both documents are not required, and BIM directs the reader to the latest issued report titled “Thermal Model and Assessment of Conceptual Summer Deposition Strategies for the Waste Rock Storage Facility at Mary River Mine Technical Memorandum” from August 29, 2023. This is the required document and is the report found within Baffinland’s last issued Phase 1 Waste Rock Management Plan. Ongoing data and monitoring updates will be provided in the 2025 NWB QIA Annual Report for Operations on March 31, 2026.

Reporting Year	Rec. #	Topic	CIRNAC Recommendation	Due Date Assigned by CIRNAC	Notes	Baffinland's Response
2023	R-25	Thermistor Data	(R-25) CIRNAC recommends that Baffinland: a) Evaluate other potential causes of the elevated temperatures in the waste rock dump and discuss the potential impact on future ML/ARD development within the waste rock. b) Evaluate other potential causes for the warming trend in the deep layers throughout the measurement period. c) Report on the limitations of the present thermal model by not incorporating heat generation from geochemical reaction and convection. d) Revise modelling to determine potential effects resulting from inflow of warmer air and temperature increases from 5 to 10 m depth in the waste rock dump. e) Consider and examine the potential for the contribution of ground subsidence to the negative elevation observations. The installation of some settlement plates should be considered.	15-Oct-25	See 2025 CIRNAC Recommendation R-05.	This comment has been addressed in Appendix E.12 – BIM Response to Comments on the 2023 NWB QIA Annual Report for Operations, submitted with the 2024 Annual Report on March 31, 2025: a) <i>Data from thermistor strings show that the pile is sustaining freezing conditions during all times as per the design intent, even during temporary and localized events of warming temperatures, except for the upper active zone subject to seasonal freezing and thawing. The improvement in water quality demonstrates that localized variations in the waste rock temperature are not compromising the design and do not pose a risk of increasing ARD/ML.</i> <i>Earlier in 2024, three (3) additional thermistor strings were installed in target locations in the pile, with a fourth thermistor string installed to replace a damaged and previously “down” Thermistor. These installations will supplement temperature monitoring within the pile, expand the extent of monitored areas, and allow for continuous monitoring as the pile is progressively constructed. Together with water quality monitoring, temperature data from the thermistor strings will continue to constitute the primary means for assessing the thermal behavior of the pile, supporting calibration of thermal models, and guiding the planning and execution of mitigation options.</i> <i>Depending on variations in water quality and the evolution of temperatures in the pile, supplemental thermal models could be prepared specifically to investigate the impacts of such events on the thermal regime of the pile, and whether they could pose a risk on future ML/ARD development, and will be considered if future monitoring indicates it is warranted.</i> b) <i>Temperatures greater than 0 °C have only been associated with the top 3 nodes of thermistor strings, which correspond to the seasonally thawed active layer every summer.</i> <i>There is a minor warming at depth just slightly above 0°C (0.1-0.2°C) per year between the 560-570 elevations. This warming trend appears to be correlated with seasonal air temperatures, and does not appear to be geochemical in origin.</i> c) <i>Because of the effects of permafrost heat loss through convection, the modeled and measured thermal results are indicative of no geochemical reactions taking place at below freezing temperatures.</i> d) <i>At instrumentation location T2, Baffinland assumes CIRNAC is referencing the apparent 4-5 m reduction in ground elevation observed in the June 2022 survey, as shown in Figure 5 Appendix A2 of the Waste Rock Management Plan – June 2023 Through September 2026 Report (Thermal Model and Assessment of Conceptual Summer Deposition Strategies for the Waste Rock Storage Facility at Mary River Mine Technical Memorandum) of WSPs June 2023 to Sept 2026 WRMP Report, where the reported ground surface elevation changes from ~ 581 m to ~ 576 m. This is a survey error, where the</i>

Reporting Year	Rec. #	Topic	CIRNAC Recommendation	Due Date Assigned by CIRNAC	Notes	Baffinland's Response
						elevation is reported to be back to ~ 581 m in the later August 2022 survey. Further validation checks on more recent surveys completed in July, August and September of 2023 confirm this to be true with the ground elevation continuing to report ~ 581 m. e) An overall review of the 2024 WRF settlement map indicates no significant settlement at the thermistor locations from summer to summer. Apparent elevation changes in areas of no activity (active dumping or aggregate removal) may be attributed to snow accumulation and melting on subsequent surveys. Ongoing data and monitoring updates will be provided in the 2025 NWB QIA Annual Report for Operations on March 31, 2026.
2023	R-26	Permafrost Storage as Main Mitigation Strategy	(R-26) CIRNAC recommends that Baffinland: a) Evaluate the predicted ground surface temperatures and permafrost development in light of the effects of climate change on the waste rock pile using recent climate change predictions. b) Examine and explain the reasons behind a trend of increasing surface temperature at BH1 at about 19 m depth, as well as what implications it may have to the thermal/physical stability of the pile.	15-Oct-25	See 2025 CIRNAC Recommendation R-06.	Part a) of this comment has been addressed via the update to the ICRP and has been superseded in light of further comments from this year, specifically R-06. Part b) was addressed in Appendix E.13 – BIM Response to Comments on the 2023 NWB QIA Annual Report for Operations, submitted with the 2024 Annual Report on March 31, 2025: b) Previous thermal assessments done in 2019 (Golder 2019) and 2021 (Golder 2021) discussed the potential effects of widespread internal heat generation in the pile, with the general conclusion that internal heat generation, while possible, was not a primary force governing the thermal regime of the pile, based on the model predictions and the available instrumentation data at that time. For the 2023 assessment, it was observed during the instrumentation data review that a prolonged period of warmer rock fill temperatures occurred at BH1 between July 2020 and April 2021, but no such variation was observed along BH2 and BH3, suggesting that the warming event measured at certain depths along BH1 was localized, and not widespread.
2023	R-27	Sulphur-Independent Acidification in ML/ARD Samples	(R-27) CIRNAC recommends that Baffinland: a) List the concentration range of the melanterite measured in the waste rock samples. b) Correlate SFE iron and sulphate concentrations for waste rock samples with low paste pH. c) Evaluate if melanterite dissolution could provide the required acidity.	15-Oct-25	See 2025 CIRNAC Recommendation R-24.	This comment has been addressed in Appendix E.12 – BIM Response to Comments on the 2023 NWB QIA Annual Report for Operations, submitted with the 2024 Annual Report on March 31, 2025: Baffinland has engaged Stantec to develop a comprehensive Pit Water Quality Model that will take into consideration all aspects of the listed recommendation, including modelled Melanterite concentrations and potential dissolution mechanisms. The Pit Water Quality Model will evaluate all inputs and considerations affecting ARD potential and other mechanisms that could contribute to the dissolution of metals from the mine ore and wastes and the resulting short and long term effects on water quality. The results of the Pit water quality model will be submitted to the NWB, CIRNAC, and other regulators as part of ICRP Rev 6 by December 31, 2025.

Attachment 2
250731 ESCA Update

To: Nunavut Water Board, Fisheries and Oceans Canada
From: Baffinland Iron Mines Corporation
Title: **Erosion and Sediment Control Training**
Date: July 31, 2025

EROSION AND SEDIMENT CONTROL TRAINING

As part of Commitments under the Water Licence 2AM-MRY1325 Renewal process, and feedback received from DFO, Baffinland developed an In-house Erosion and Sediment Control Awareness training and completed its delivery to applicable staff, prior to freshet 2025.

DFO Commitment # 2 in response to concern and/or recommendation by DFO (DFO-TRC-02):

Baffinland will implement erosion and sediment control training as required for personnel involved with the planning, installation, and maintenance of erosion and sediment control measures. In-house Erosion and Sediment Control Awareness training will be rolled-out during winter 2024-25.

This memo provides an update on the development of an Erosion and Sediment Control Awareness training, undertaken to fulfil this commitment. We trust that the implementation of this training satisfies the recommendation provided by DFO.

STATUS

Baffinland developed an In-house, Erosion and Sediment Control Awareness (ESCA) training, during Q4-2024 and Q1-2025. Delivery of the ESCA was completed during May 03 and June 14 2025, with a target audience of:

- Relevant Department Superintendents, Supervisors, Equipment Operators, monitoring staff, and Labourers

A total of 127 personnel received the training.

TRAINING OUTCOMES

Developed as an introduction to erosion and sediment control, the ESCA covered the following topics:

- Legislation that governs erosion and sediment control
- Types of erosion
- Factors that influence erosion
- Erosion and sediment control Best Management Practices (BMP's)
- Installation of Best Management Practices

The ESCA was derived from the Canadian Certified Inspector of Sediment and Erosion Control (CAN-CISEC), certification training, to ensure consistency with regulatory requirements and current industry knowledge and practices. Further customization of the training content was necessary to reflect the specific conditions encountered at the Mary River Project.

In particular, emphasis was placed on:

- Water erosion and how to identify it on site (rill, gully, channel erosion)
- Understanding the different qualities between cohesive soils found in more southern locations and the non-cohesive, rock and granular substrate present at the Project.
- Understanding the challenges associated with erosion and sediment control of non-cohesive soil
- Understanding how to use slope length and gradient as an erosion and sediment control BMP
- Choosing the right BMP for site-specific conditions and understanding the limitations of BMP's commonly used at the Project
- Installation of silt fences, coir logs, check dams and rock armouring

The training was well received and attendees acknowledged they underestimated the complexity of erosion and sediment control and that they had gained insight on how to better respond to active erosion and sedimentation at the Project.

APPENDIX E.13.1B

Dedicated Narrative Response to CIRNAC Comments on Baffinland's 2024 QIA-NWB Annual Report for Operations

1.0 Purpose

This appendix has been prepared to provide a dedicated narrative response to the comments and recommendations submitted by Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) on Baffinland's 2024 QIA-NWB Annual Report for Operations. It has been prepared in direct response to CIRNAC's request that outstanding recommendations be addressed either in the main body of the report or in a clearly identified dedicated subsection, rather than solely in tabular format. The Nunavut Water Board's November 19, 2025 technical review letter carried that expectation forward and identified CIRNAC recommendations that remained not adequately addressed or unresolved pending further updates, for response through the 2025 Annual Report.

This appendix is intended to stand on its own as Baffinland's narrative response to those CIRNAC comments. Table A.4 in Appendix E.13 remains the formal tracking table for continuity with prior annual reporting, but this appendix presents Baffinland's technical rationale, supporting context, and position on each item in a more direct and fully developed format. The appendix also cross-references relevant technical appendices, quarterly QA/QC submissions, and supporting memoranda where those documents provide the evidentiary basis for the positions set out below.

2.0 General Approach

Baffinland's response to CIRNAC's 2024 Annual Report comments is guided by three principles.

First, where CIRNAC requested information that had already been submitted through previous annual report responses, quarterly QA/QC reporting, technical memoranda, or other formal submissions, Baffinland has clarified where that information can be found and has improved cross-referencing so that the supporting basis is more readily traceable.

Second, where CIRNAC requested additional analysis, graphical presentation, or future work, Baffinland has identified how those matters are being addressed through the 2025 Annual Report, supporting appendices, or planned 2026 technical work.

Third, where CIRNAC requested fixed implementation schedules, broad expansion of monitoring programs, or other actions beyond what Baffinland considers technically warranted or required under the Water Licence, Baffinland has explained why those matters are more appropriately managed through risk-based operational planning, site inspection, targeted monitoring, and adaptive management under Arctic mine site conditions. This is consistent with the NWB's reminder that annual report comments should remain tied to Water Licence reporting requirements and that some matters may be more appropriately addressed through other processes.

3.0 Review of Previous CIRNAC Annual Report Recommendations

R-01 – Review of Previous CIRNAC Annual Report Recommendations (2021 to 2023)

CIRNAC's principal concern under R-01 was that a number of recommendations from prior annual report reviews remained categorized as "Not Addressed" or "In Progress," and that Baffinland should address

those items by October 15, 2025. Baffinland's position is that it did provide a comprehensive response to those outstanding items in its October 15, 2025 submission to the Nunavut Water Board, including the information contained in Table A4.1 of that submission. CIRNAC subsequently advised, in its October 24, 2025 reply, that several recommendations, specifically R-01, R-26, and R-27, remained outstanding, and also stated that responses should be integrated into the main body of the report or clearly presented in a dedicated subsection rather than solely in tabular format.

Baffinland notes that responses to the outstanding "Not Addressed" and "In Progress" items were in fact provided on October 15, 2025, with the exception of the deferred substantive matters now addressed in this appendix under R-26 and R-27. Baffinland therefore understands CIRNAC's October 24 reply to have been prepared without the benefit of full consideration of the October 15 submission. This appendix has been prepared specifically to remove any remaining concern regarding response format and to ensure that Baffinland's positions on all outstanding items are fully set out in narrative form. **Baffinland therefore considers R-01 closed.**

4.0 Reporting Format, Traceability, and Supporting Documentation

R-03 – Other Details (Schedule B, Section I)

CIRNAC recommended that Baffinland include a section in the Annual Report confirming whether any other details on water use or waste disposal had been requested by the Board, and summarizing past requests of that nature and whether they had been completed. Baffinland's position is that no such requests were made by the Board during 2024, which is why the Concordance Table appropriately identified this item as "Not Applicable." Baffinland also notes that no requests of this nature have been made by the Board since the Licence was issued in 2013. For greater clarity, however, the 2025 Annual Report includes a dedicated section confirming where such information would be presented should the Board request additional details in future.

R-07 – Construction Works at the WRF

CIRNAC requested a summary of construction activities carried out at the WRF in 2024, including photographs showing progression of the works, and a list of the main construction activities planned for 2025. Baffinland's response is that the relevant supporting documentation has been provided through Appendix E.13.1D, the As-Built Report for the 2024 Geotube Pond Liner Replacement. That appendix documents the work completed and provides the requested supporting record. Baffinland therefore considers R-07 closed.

R-08 – Construction Materials: Geochemical Properties, Used Volumes, and Destination

CIRNAC requested summary figures and interpretive graphs for the geochemistry results of construction materials and detailed off-site analytical results for Quarry Q1 material. Baffinland acknowledges that its previous reporting presented geochemistry results in tabular form and that additional interpretive graphics would improve readability. Baffinland further clarifies, however, that no active drilling or blasting occurred at Quarry Q-01 in 2025. Because ABA and geochemistry samples for Q-01 are collected from drill

cuttings generated prior to blasting, no new Quarry Q-01 analytical results were produced during the 2025 reporting period. Material previously quarried from Q-01 continued to be used where appropriate, but that material had already been characterized through prior years' sampling and analysis.

Although the Water Licence does not explicitly require interpretive graphs, Baffinland has responded to CIRNAC's broader concern by adding new tables and figures in Section 9 of the 2025 Annual Report to better present the geochemical characteristics of construction waste rock used during the reporting period. These are presented as Table 9.3 and Figure 13 and provide a more interpretive presentation of the 2025 geochemistry dataset than in previous years. In Baffinland's view, that additional presentation addresses CIRNAC's concern regarding clarity and interpretation of construction material geochemistry results for the current reporting period.

R-09 – Waste Rock ARD Classification and WRF Cover Confirmation

CIRNAC requested inclusion of drilling depths in Table 9.2, interpretive graphs for on-site geochemistry results, and the off-site validation results and third-party consultant report associated with the WRF cover confirmation program. Baffinland acknowledges that Table 9.2, as presented in the 2024 Annual Report, did not reproduce drilling depth information. However, Table 9.2 was only intended as a summary of the 2024 QA/QC drilling program for the 4 m NAG cover requirement at the WRF, which was undertaken in response to the specific requirement from QIA and CIRNAC that at least 85% of the WRF be capped with a minimum of 4 m of NAG waste rock. The primary basis for confirming achievement of that requirement was not Table 9.2 alone, but the signed and stamped quarterly WRF QA/QC reports, supported by certified survey elevations used to verify cover thickness across the applicable WRF footprint. In addition, the Q4 WRF QA/QC report, including the WSP Canada Inc. technical memo titled Waste Rock Facility Drilling and Sampling Campaign, Cover Requirement Evaluation (Appendix E.13.1F), provides additional technical context for the confirmation program. Taken together, these submissions demonstrate that achievement of the 4 m NAG cover requirement was formally confirmed through the approved QA/QC reporting process.

With respect to figures and interpretive graphs, Baffinland is providing additional tables and figures in Section 9 of the 2025 Annual Report to better summarize the relevant on-site waste rock geochemistry results for NAG material. With respect to off-site validation, Baffinland does not consider there to have been a reporting gap. The relevant third-party review is the WSP technical memo referenced above, and the ABA and SFE results associated with the WRF QA/QC program were already provided in the appended analytical results of the quarterly WRF QA/QC reports submitted to CIRNAC and QIA (Appendix E.13.1E). Those same quarterly reports also included the signed and stamped survey-based confirmation of cover thickness. Baffinland therefore considers R-09 closed.

Reference note:

Relevant context includes Table 9.2 of the 2024 Annual Report, the approved WRF QA/QC Monitoring Plan, the signed and stamped quarterly WRF QA/QC reports submitted to CIRNAC and QIA, which include supporting certified survey elevations used to confirm achievement of the 4 m NAG cover over at least

85% of the WRF, and the WSP Canada Inc. technical memo Waste Rock Facility Drilling and Sampling Campaign, Cover Requirement Evaluation.

R-11 – Record of Progressive Reclamation Activities

CIRNAC requested details, reclaimed areas, and before/after photographic records for progressive reclamation activities, together with planned work and anticipated schedules. Baffinland has responded by providing details and photographic records for progressive reclamation activities in the 2025 Annual Report, including Appendix C.1.6 for reclaimed borrow source locations and Appendix E.15 for maintenance of the non-AG waste cover at the WRF. Baffinland has also clarified that planned progressive reclamation work related to borrow areas along the Tote Road is presented annually in Appendix C.4. More detailed fixed implementation schedules are not practical to commit to in advance because work sequencing depends on unanticipated equipment downtime, material availability, sealift timing, and a short weather-dependent construction season. Reclamation activities are therefore advanced through an adaptive approach that prioritizes emerging risks and takes advantage of operational windows when personnel, equipment, materials, and site conditions are aligned to safely and effectively complete the work. Baffinland therefore considers R-11 closed.

5.0 WRF Thermal Performance, Geochemistry, and Seepage

R-05 – Results of Thermal Monitoring

CIRNAC requested that Baffinland provide monitoring results for all instrumentation in operation at the WRF, in tables and graphs showing evolution over time and depth. Baffinland has responded by including Appendix E.13.1C, "July 2025 Waste Rock Facility Thermistor Monitoring," as well as annual WRF thermal monitoring data, tables, and graphs in Appendix E.15.1 of the 2025 Annual Report. Those materials present the thermal monitoring results in the format requested and provide the basis for review of temporal and depth-related trends. Baffinland therefore considers R-05 closed.

R-06 – Climate Change Scenario

CIRNAC expressed concern that previous WRF thermal assessment work relied on an optimistic SSP1-2.6 climate projection and requested that multiple climate change scenarios be considered, together with a schedule for thermal modelling. Baffinland agrees that a range of scenarios is more appropriate for long-term understanding of WRF thermal performance. As set out in the latest ICRP, Baffinland plans to complete 2D thermal modelling of the WRF active layer in 2026 and to consider multiple climate change scenarios in that work. Baffinland therefore considers that the requested next step has been identified and scheduled, and that the appropriate place for detailed results will be the future ICRP and associated supporting reporting.

R-22 – Seepage Monitoring and Groundwater Monitoring Expansion

CIRNAC recommended that the groundwater monitoring plan be expanded to the WRF and other areas of the site to assess potential subsurface seepage in the active zone. Baffinland acknowledges the importance of confirming that seepage from site facilities is being appropriately monitored, but maintains

that the hydrogeologic context of Mary River must be properly understood. The site is underlain by continuous permafrost. Seasonal subsurface flow is generally limited to a shallow active layer, while the deeper permafrost regime substantially limits persistent groundwater migration. In that context, the most relevant pathway is shallow seasonal active-layer flow reporting locally to ground surface or drainage features, rather than sustained migration through a persistent deep groundwater system.

For that reason, Baffinland considers its existing seepage, surface water, and receiving environment monitoring programs to be the most technically appropriate tools for detecting and assessing seepage. These include routine visual inspections, seepage observations, water level observations, WRMP QA/QC monitoring, SNP monitoring, and CREMP receiving environment monitoring. With respect to the WRF specifically, previous investigations did not identify a persistent saturated groundwater zone suitable for a conventional groundwater monitoring well network. In addition, following implementation of the 4 m NAG cap over 85% of the WRF, quarterly WRMP QA/QC reporting confirmed that frozen conditions are maintained year-round within the facility profile and remain well above the original ground surface. In addition to supporting PAG management, this substantially limits the potential for waste rock contact water or associated constituents to migrate into the active layer or support sustained subsurface seepage migration. Baffinland therefore does not consider broad expansion of a conventional groundwater well network across the site to be technically warranted or likely to provide more meaningful information than the seepage, thermistor, and receiving environment monitoring lines of evidence already in place. Baffinland considers R-22 closed.

R-24 – Acidification in ML/ARD Samples

CIRNAC requested a schedule for completion of the Pit Water Quality Model. Baffinland confirms that the updated Pit Water Balance and Water Quality Model was submitted with the latest ICRP update on December 10, 2025 and is included as Appendix E.10.1 of the 2025 Annual Report. Baffinland therefore considers R-24 closed.

R-26 – Risk-Based Screening Criteria for Groundwater Monitoring

CIRNAC reiterated previous recommendations relating to the Mine Site and Milne Port groundwater risk screening frameworks and requested further rationale regarding facility scoring, why medium-risk facilities are not all monitored, why the framework had not been re-evaluated in light of changing conditions, and why two test pits were considered sufficient within the WRF. Baffinland's position is that the groundwater screening framework is a site-specific prioritization tool developed for a continuous permafrost environment, where the principal potential receptor pathway is shallow active-layer flow to surface water, not groundwater use. Facilities at the Mine Site were scored on the basis of aquatic toxicity of source material, contaminant mobility, soil type, hydraulic gradient, proximity to receptor, and presence or absence of secondary containment. Those scores are intended to support professional judgment regarding monitoring priorities; they were never intended to require automatic groundwater monitoring at every facility within a given category.

That is why the landfill and hazardous waste berms, although both medium risk, were selected for targeted monitoring based on site history, program continuity, and specific infrastructure concerns such as liner damage at HWB-1. At Milne Port, the risk ranking framework was adapted from the Mine Site framework to reflect differences in site conditions and available data. Baffinland does not consider that to be a discrepancy; rather, it is an appropriate site-specific refinement of the same overall approach. With respect to the Ore Stockpile, Baffinland does not consider a conventional groundwater well network to be warranted because the stockpiled ore mass is itself sufficiently thick to remain frozen through the open water season, as evidenced operationally by the need to rip frozen ore with dozers prior to loading. Under those conditions, the most relevant pathway is limited shallow active-layer interaction at stockpile margins, not sustained groundwater migration at depth. Likewise, within the WRF, the 2021 test pit investigations did not identify measurable groundwater, and subsequent confirmation of year-round frozen conditions within the WRF profile supports the conclusion that additional test pits or a drill-rig based groundwater well installation program would not be technically justified. Baffinland therefore considers R-26 closed.

R-27 – Waste Rock Management (WRF)

CIRNAC requested additional supporting information regarding the conclusion that 17% of WRF seepage samples being acidic was not an issue of concern, trend evaluation for metals and metalloids of environmental concern, and investigation of TDS concentrations above 1000 mg/L with possible implications for closure salinity. Baffinland's response is that the observation that approximately 17% of WRF seepage samples were acidic related to localized seepage conditions observed in 2021, before the later waste placement and ARD/ML mitigation measures were fully implemented. Subsequent placement of non-acid generating waste rock in accordance with the approved Phase 1 Waste Rock Management Plan progressively improved seepage quality, such that seepage samples since 2022 have been neutral. This interpretation is supported by the WSP 2020–2022 Waste Rock Geochemistry assessment, which documented increasing pH and decreasing concentrations of key parameters such as zinc, nickel, copper, iron, and sulphate. In Baffinland's view, these trends demonstrate that the earlier acidic seepage was localized and has been effectively mitigated.

With respect to metals and metalloids, Baffinland does not agree that total concentrations above analytical detection limits, in themselves, demonstrate neutral mine drainage or an emerging WRF water quality problem. Mary River site geology includes naturally mineralized lithologies, and it is not scientifically appropriate to interpret detections above laboratory reporting limits as evidence of mine-related impact without considering dissolved versus total concentrations, temporal trends, spatial patterns, and comparison to action levels and regulatory criteria. The approved WRF QA/QC Monitoring Plan provides the threshold and response framework for this interpretation, and dissolved concentrations were added to the seepage analytical suite in 2025 to support more refined evaluation moving forward. Baffinland will continue to use ongoing monitoring data to evaluate temporal trends for key seepage parameters, including the metals and metalloids identified by CIRNAC.

With respect to TDS, Baffinland acknowledges that historical localized seepage points at the WRF have shown TDS concentrations above 1000 mg/L. However, those results were limited to localized seepage expressions and were not representative of overall WRF pond water quality or downstream receiving environment conditions. Baffinland does not agree that such isolated historical results demonstrate that the WRF is a significant ongoing source of salinity or that they support an inference of likely adverse effects on closure performance. The elevated TDS observations were associated with earlier localized seepage conditions that pre-dated the enhanced ARD/ML mitigation measures and the 2024 implementation of the 4 m NAG cap over 85% of the WRF. That cap has now buried the surface conditions that contributed to the historical localized seepage chemistry, and ongoing instrumentation monitoring confirms that frozen conditions are maintained year-round well above the original ground surface, substantially limiting continued interaction between those historical source areas and the active layer. Baffinland therefore does not consider a separate salinity investigation or mitigation program to be warranted at this time. Baffinland considers R-27 closed.

Reference note:

Relevant context includes Baffinland's October 15, 2025 response to outstanding CIRNAC recommendations, the WSP 2020-2022 Waste Rock Geochemistry assessment, the WRF QA/QC Monitoring Plan, and quarterly WRMP QA/QC reporting confirming implementation of the 4 m NAG waste rock cap over 85% of the WRF and maintenance of frozen conditions within the facility profile.

6.0 Tote Road, Borrow Areas, Drainage Features, and Climate Resilience

R-17 – Tote Road Priority Actions

CIRNAC requested a schedule for completion of the detailed action plan for addressing geotechnical risks associated with all identified borrow areas. Baffinland acknowledges the recommendation but notes that the relevant priority actions are already identified and tracked annually through Appendix C.4, the Tote Road Priority Action Schedule. Those actions are updated annually and provide the operative work planning basis for borrow and cut reclamation. Baffinland also notes that the Water Licence does not require fixed implementation dates of the type requested. Given the operational realities of a remote northern mine site, including short weather-dependent construction seasons, equipment availability, material constraints, and sealift timing, Baffinland does not consider it practical or appropriate to commit to fixed implementation dates for each item. Implementation must remain adaptive and risk-based. Annual reporting will continue to provide updates on priority borrow area actions and progressive completion. Baffinland therefore considers R-17 closed.

R-21 – Performance of P-SWD-3 Surface Water Collection Ditch

CIRNAC retained its prior recommendation regarding the P-SWD-3 ditch until the geotechnical engineer's recommendations from the 2024 Annual Geotechnical Inspection are implemented and a response is provided concerning freeze/thaw stability of drainage ditches and slopes. Baffinland confirms that the recommendations arising from the 2024 inspection remain under active consideration within the project's

risk-based work planning processes. Baffinland also notes that the geotechnical engineer's recommendations associated with P-SWD-3 and related drainage features are not all of equal urgency and must be prioritized on a risk basis, having regard to relative risk to safety, environmental performance, and infrastructure integrity. At present, the P-SWD-3 ditch continues to operate effectively and conveys water to monitoring locations that did not show elevated TSS criteria in 2025.

With respect to thermal and freeze/thaw stability, Baffinland notes that drainage ditches and berms at site operate in a continuous permafrost environment and are therefore subject to expected seasonal changes in thermal condition and hydraulic behaviour. Their primary function is generally most critical during freshet, when frozen ground limits infiltration, runoff coefficients are high, and effective surface conveyance is required to manage snowmelt and prevent erosion or washout of adjacent infrastructure. Baffinland does not consider seasonal thaw-related infiltration through berms or ditch slopes, in itself, to indicate that such features are not functioning as intended. Performance must instead be assessed in the context of each feature's intended function, the seasonal hydrologic conditions under which it operates, and whether any thaw-related seepage presents a credible infrastructure or environmental risk. For contact-water systems, conveyance ditching and downgradient controls are inspected and augmented where necessary. For the majority of clean-water diversion features, some seasonal infiltration through thawed materials is not considered critical to environmental protection, provided the features continue to perform their intended function during freshet and other higher-flow periods. Baffinland therefore considers drainage ditch and berm performance to be appropriately managed under its current inspection, monitoring, and adaptive management framework. Baffinland considers R-21 closed.

R-23 – Rainfall / Climate Change

CIRNAC recommended that the site climatic database be updated, hydrology design criteria re-evaluated, surface water management infrastructure adequacy re-evaluated, and dykes, dams, and related earthworks inspected following the September 20, 2024 rainfall event. Baffinland acknowledges that the event was extreme and caused localized damage to sections of the Tote Road and associated surface water management features. Baffinland agrees that such an event provides an important opportunity to assess infrastructure performance, confirm adequacy of controls, and incorporate lessons learned into engineering review and operational preparedness.

At the same time, Baffinland does not consider it technically appropriate to automatically revise project-wide hydrology design criteria or re-open all design assumptions solely on the basis of one isolated event. The September 2024 rainfall event is instead being treated as an important line of evidence to inform ongoing review. In that regard, Baffinland notes that, notwithstanding localized damage to two portions of the Tote Road, the broader performance of ponds and related surface water management infrastructure during an event estimated to exceed the 1:1000-year 24-hour rainfall event provides evidence that the existing design approach was generally robust and incorporated sufficient conservatism to perform well beyond the nominal design event at many locations. Baffinland therefore considers the appropriate response to be a focused, risk-informed review of relevant infrastructure and earthworks,

together with incorporation of updated climatic information into ongoing engineering assessment and annual geotechnical inspection processes. Baffinland considers R-23 closed.

Reference note:

Relevant guidance includes Engineers Canada's *Public Guideline: Principles of Climate Adaptation and Mitigation for Engineers*, which supports a risk-based and adaptive approach using plausible future conditions, professional judgment, and progressive refinement over time; Housing, Infrastructure and Communities Canada's *Codes, standards and guidance for climate resilience*, which summarizes current Canadian climate-resilient infrastructure standards work; and TAC's *Guide to Bridge Hydraulics, Third Edition*, which includes updated Canadian guidance related to climate change, extreme weather events, and permafrost in hydraulic and hydrologic design.

7.0 Monitoring, QA/QC, and Specific Facility Concerns

R-14 – Mine Site Explosive Magazine Area Water Quality Monitoring

CIRNAC recommended that the surface water pond located at the Explosive Magazine Area be added to the annual monitoring program and sampled for Groups 1, 5, 7, and 8. Baffinland's response is that the feature CIRNAC identified in the Annual Report photographs is not an active discharge location and is not the proposed MS-13 station. The visible ponded water is non-contact water snowmelt that has settled into a natural depression. Prior to implementation of Modification 13 and rerouting of haul road water to the KM105 Facility, the area did receive haul road runoff, which explains residual iron staining. Since those drainage changes were implemented, all mine haul road contact water in that area has been rerouted to the KM105 Facility. The identified depression is therefore not a Schedule I effluent point and is not the proposed MS-13 location. Baffinland does not consider additional annual monitoring at that location to be warranted and considers R-14 closed.

R-15 – Water Quality Blank and QA/QC Issues

CIRNAC requested additional comments on sources of blank contamination and why those sources are not likely to influence field samples, as well as review of sampling SOPs to prevent further QA/QC issues. Baffinland completed an assessment of the deionized water used in the QA/QC program and concluded that analyte detections above LDL in field, trip, and equipment blanks were not attributable to the source water itself. Rather, the most likely causes were low-level contamination introduced during blank preparation, handling, transport, or field activities, including sample containers, filtering or sampling equipment, preservatives, workspace conditions, and atmospheric exposure during handling. Baffinland's QA/QC Plan does not treat every blank detection above the LDL as automatically invalidating associated field data. Instead, significance is assessed based on the magnitude of the result relative to the applicable detection limit. Results greater than the LDL but less than or equal to five times the LDL are treated as low-level detections near the practical limit of analytical sensitivity, while results greater than five times the LDL are treated as significant and investigated. In the 2024 stream and lake sampling program, only three blank results exceeded that significance threshold, representing approximately 1% of all blank results, and those results were investigated. Baffinland has also reviewed and updated relevant SOPs,

enhanced training, improved cleaning and storage of containers and equipment, and strengthened workspace cleanliness controls during blank preparation and sample handling. Baffinland therefore considers R-15 closed.

Reference note:

Relevant guidance includes the Project QA/QC Plan, CCME's *Protocols Manual for Water Quality Sampling in Canada*, which describes blanks as tools to identify contamination from containers, equipment, preservatives, atmosphere, handling, transport, and other systematic or random errors, the *British Columbia Field Sampling Manual - Part E1: Surface Water*, which supports use of project-specific DQOs and provides five times the reportable detection limit in a blank as an example quantitative DQO, and Environment and Climate Change Canada's *Metal Mining Technical Guidance for Environmental Effects Monitoring*, which describes field and trip blanks as checks on contamination from sample handling and preservation/storage conditions.

R-19 – Alternative Remediation Methods for Hydrocarbon-Impacted Soils

CIRNAC requested a schedule for delivery of a remediation plan and/or study work plan for ongoing investigation of alternative remediation treatment and hydrocarbon disposal methods. Baffinland acknowledges the recommendation and confirms that, following limited success of previous landfarm treatment efforts under Arctic conditions, it has engaged a qualified engineering consultant to develop a practical northern-appropriate Landfarm Operations Plan and performance verification program. The purpose of this work is to establish an implementable approach to treatment of hydrocarbon-impacted soils under the constraints of short thaw seasons, low ambient temperatures, frozen materials, and equipment and access limitations typical of a remote Arctic mine site. The consultant's work is expected to include a detailed operating plan and a performance verification and sampling program to assess treatment progress and effectiveness. This work will be supported by substantial soil characterization during the 2026 field season. Baffinland's current schedule is to finalize the consultant-led Landfarm Operations Plan in 2026 and complete supporting characterization and field verification work during the 2026 operational season.

R-20 – Schedule I Monitoring Requirements

CIRNAC requested methodology and back-up data for how flow rates and/or discharge volumes are calculated at each monitoring location, and a summary table confirming that Schedule I monitoring and sampling requirements are being met. Baffinland confirms that methodology for calculating flow rates and discharge volumes is already set out in the Fresh Water Supply, Sewage, and Wastewater Management Plan. Daily discharge volumes for Schedule I discharge points are also reported in the Annual Report, including Tables 5.1, 5.3, and 5.4, and through the Monthly Water Licence reports. At most discharge locations, discharge volume is measured using pump totalizers installed on the discharge systems. The exception is MS-11, where flow is determined using daily manual flow measurements during the initial thaw period, followed by pressure transducer-based calculation once site conditions allow. Baffinland also clarifies that Schedule I sampling requirements apply only when discharge is occurring. This is why no Schedule I effluent sampling was required at MS-07 in July 2024, even though other water quality parameters such as TSS, pH, and oil and grease were collected under Part E, Item 5 rather than under Schedule I. Baffinland has improved the explanatory text in Section 5.1.3 of the 2025 Annual Report

and notes that discharge timing and Schedule I compliance triggers are already tracked in the Monthly Water Licence reports. Baffinland therefore considers R-20 closed.

R-25 – Management Plan Updates: Spill Contingency Plans

CIRNAC recommended that the Spill Contingency Plans include prevention measures and response protocols related to known or trending spill risk scenarios based on site spill data, including wastewater or impacted water. Baffinland acknowledges CIRNAC's recommendation and agrees that evaluation of whether more explicit spill scenarios would improve the site's preparedness is appropriate. At the same time, Baffinland notes that the underlying principles and response approach in the Spill Contingency Plan are already broadly applicable across most spill scenarios. Baffinland will nevertheless consider CIRNAC's comment in the next update of the Spill Contingency Plan. Baffinland therefore considers R-25 closed.

8.0 Conclusion

This appendix has been prepared so that CIRNAC's outstanding and unresolved annual report recommendations can be read and understood in a dedicated narrative format, without requiring the reader to rely on the tabular response format alone. The NWB's November 19, 2025 technical review letter identified CIRNAC comments requiring response through the 2025 Annual Report and noted CIRNAC's expectation that detailed responses be provided either in the main body of the report or in a clearly outlined dedicated subsection. This appendix is intended to satisfy that expectation.

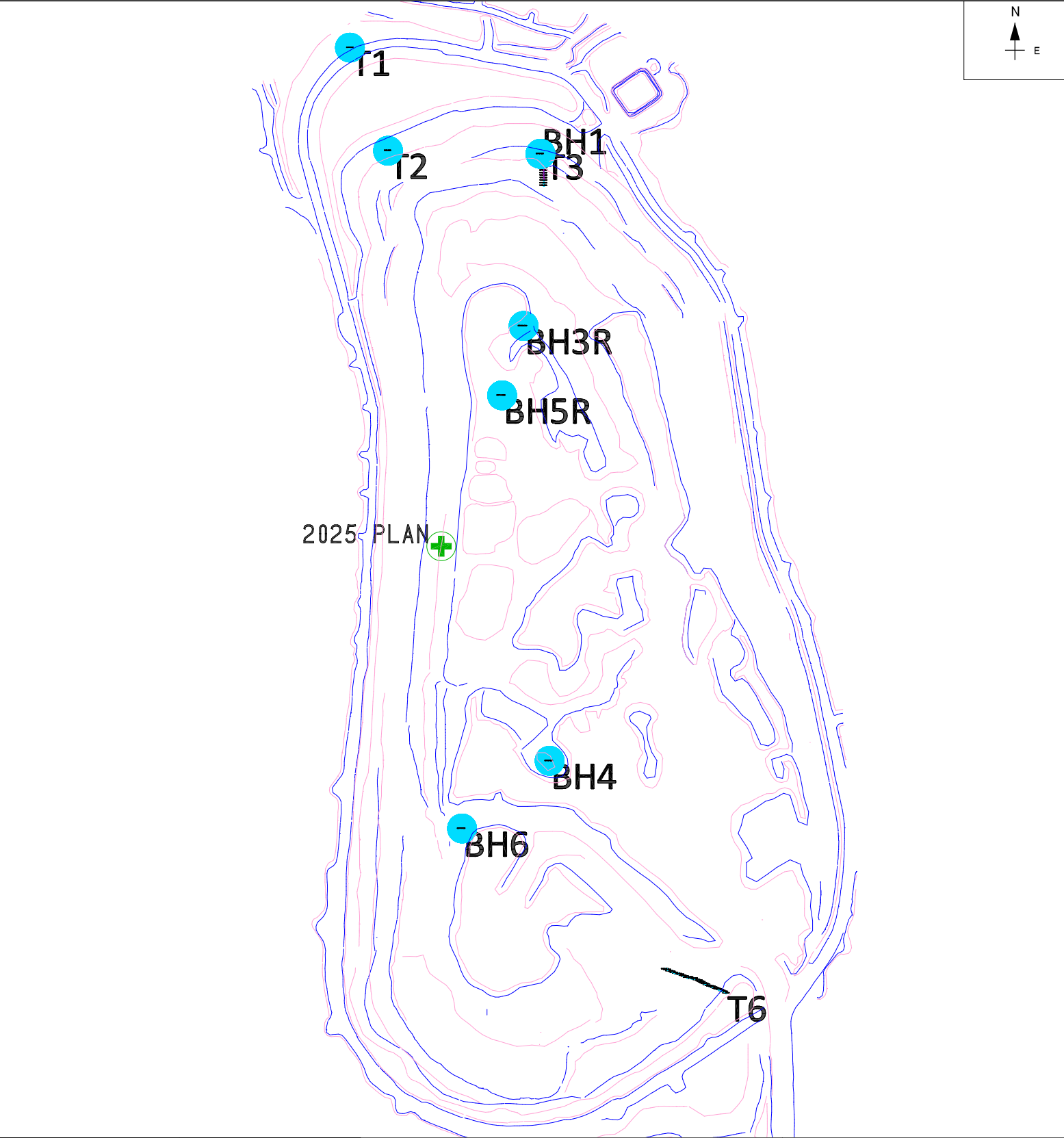
In Baffinland's view, the combination of this appendix, Table A.4, and the supporting appendices and quarterly QA/QC reports now provides a complete response to the CIRNAC annual report comments identified by the NWB. Where Baffinland has expressly stated in its detailed response table that an item is considered closed, that closure position has been carried forward here. Where future work remains ongoing, Baffinland has identified the appropriate reporting pathway and schedule. The result is intended to provide CIRNAC and the NWB with a clear, stand-alone explanation of Baffinland's technical rationale, supporting documentation, and current position on each item.

Appendix E.13.1C

WRD Instrumentation Status,
Thermistor Location Map &
2025 Installation Plan

Waste Rock Facility Instrumentation Status – July 2025			
Station / Sensor	Sensor Status	Last Data Download	Damaged Sensors / Missing Data / Comments
BH1 - Thermistor	Up	June 2025	- No known damage - Data missing between Nov 2021 and April 2022 (dead battery replaced) - Data missing between Dec 2024 and February 2025 (dead battery replaced)
BH1 - Vibrating Wire Piezometer	Up	June 2025	- No known damage - Same records as BH1 - Thermistor
BH1 - Oxygen	Permanently Down	May 2020	Permanently down May 2020
BH3R - Thermistor	Up	June 2025	- New install October 2024 in similar location to replace previously damaged BH3 - No known damage
BH4 - Thermistor	Up	June 2025	- New install April 2024 - Nodes at 608.96m, 606.96m damaged since April 2025
BH5R - Thermistor	Up	June 2025	New install April 2024, damaged July, reinstalled October 2024 similar location.
BH6 - Thermistor	Up	June 2025	- New Install in PAG cell October 2024 - No known damage
T1 - Thermistor	Up	June 2025	- No known damage - Data missing between July – Aug 2019 (disconnected for pond raise) - Data missing between April 2022 and July 2022
T2 - Thermistor	Up	June 2025	- Bead at 0.93m damaged since August 2019 - Missing data between April 2020 and August 2020 - Bead at 1.93m functioning inconsistently between February 2021 and June 2021. - Bead at 2.93m damaged since May 2021. - Beads at 3.93 and 4.93m functioning inconsistently since May 2021
T3 - Thermistor	Up	June 2025	- No known damage. - Data missing between June 2023 and January 2024 (dead battery replaced) - Data missing between November 2024 and February 2025 (dead battery replaced)
T6 - Thermistor	Up	June 2025	- New install October 2024 - No known damage

WASTE ROCK FACILITY: THERMISTOR LOCATION MAP



SURVEY DATE	JUNE 2025
PRINT DATE	JULY 2025

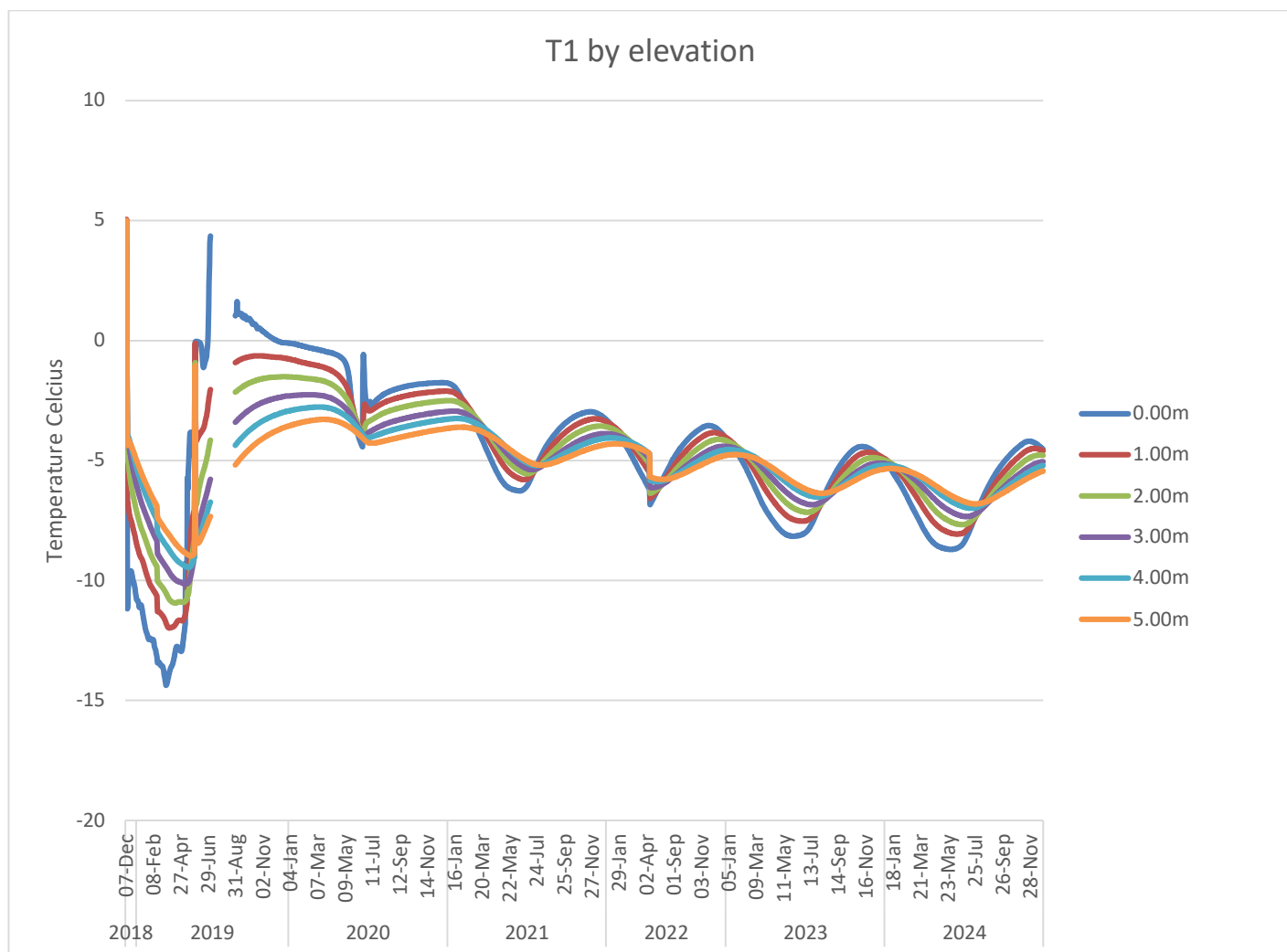
1 : 6000

LEGEND
• Vertical Thermistor
— Horizontal Thermistor
• Proposed Thermistor
— Crest
— Toe

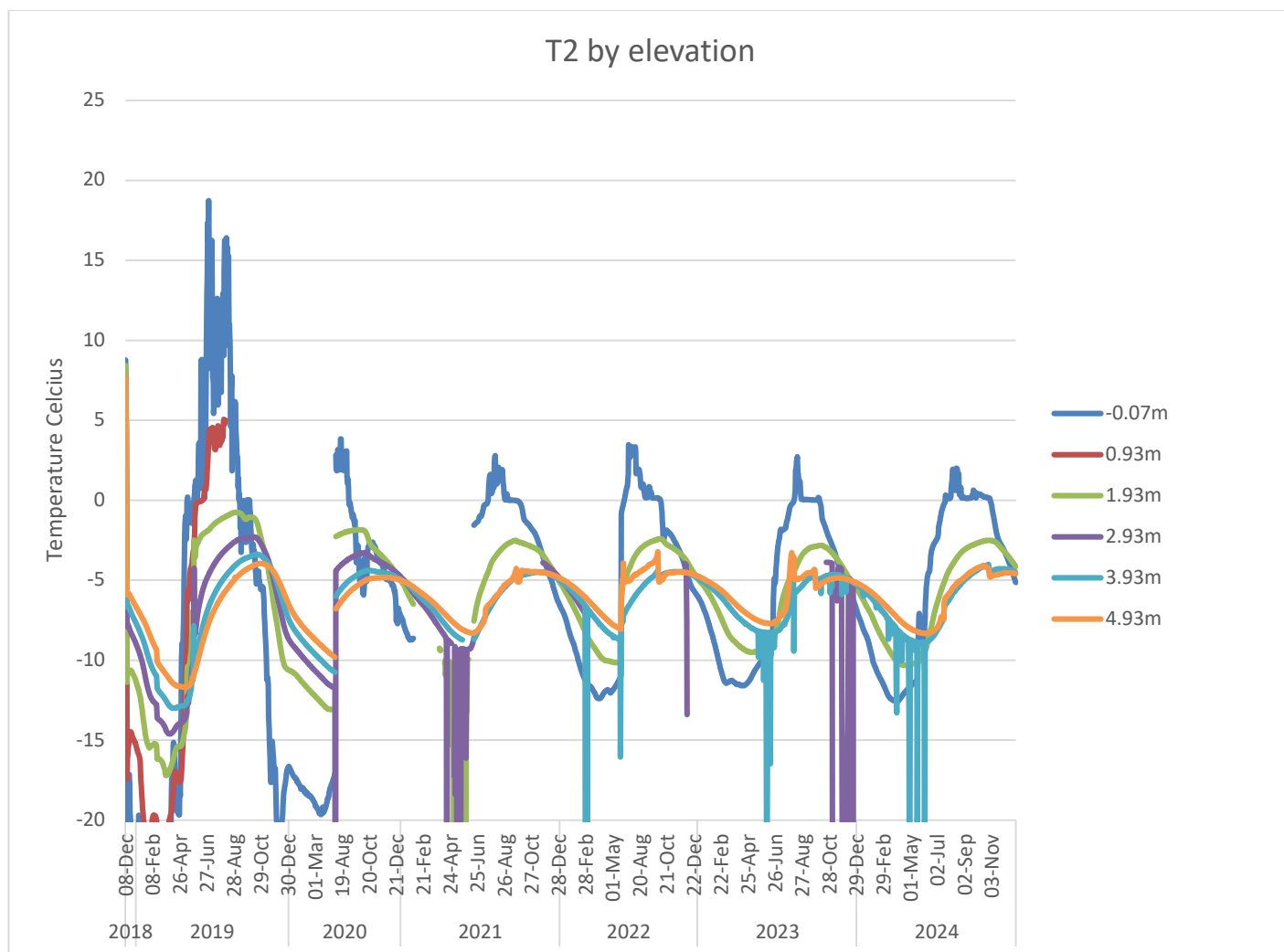


Appendix E.13.1C

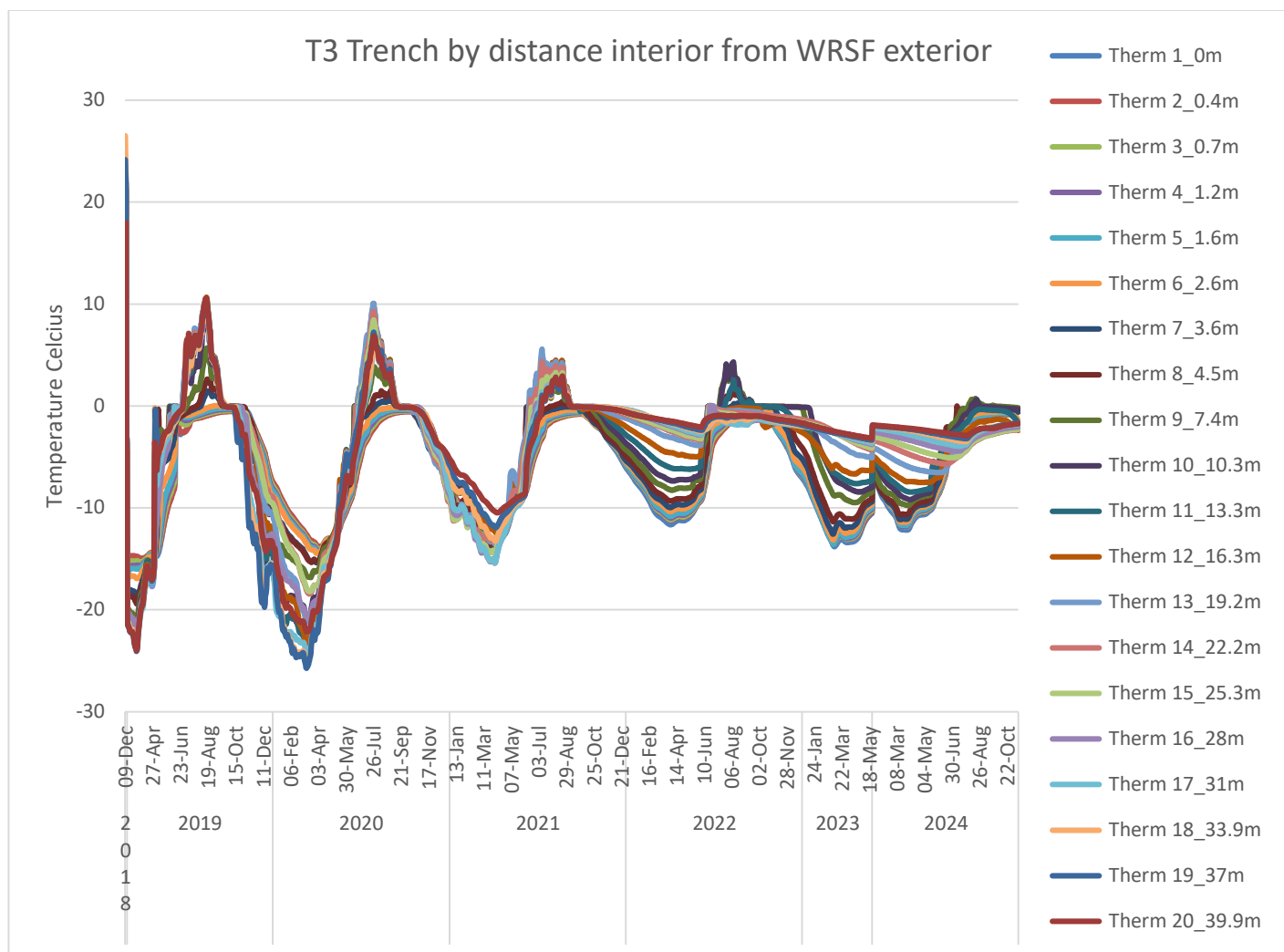
Thermistor Results for 2024



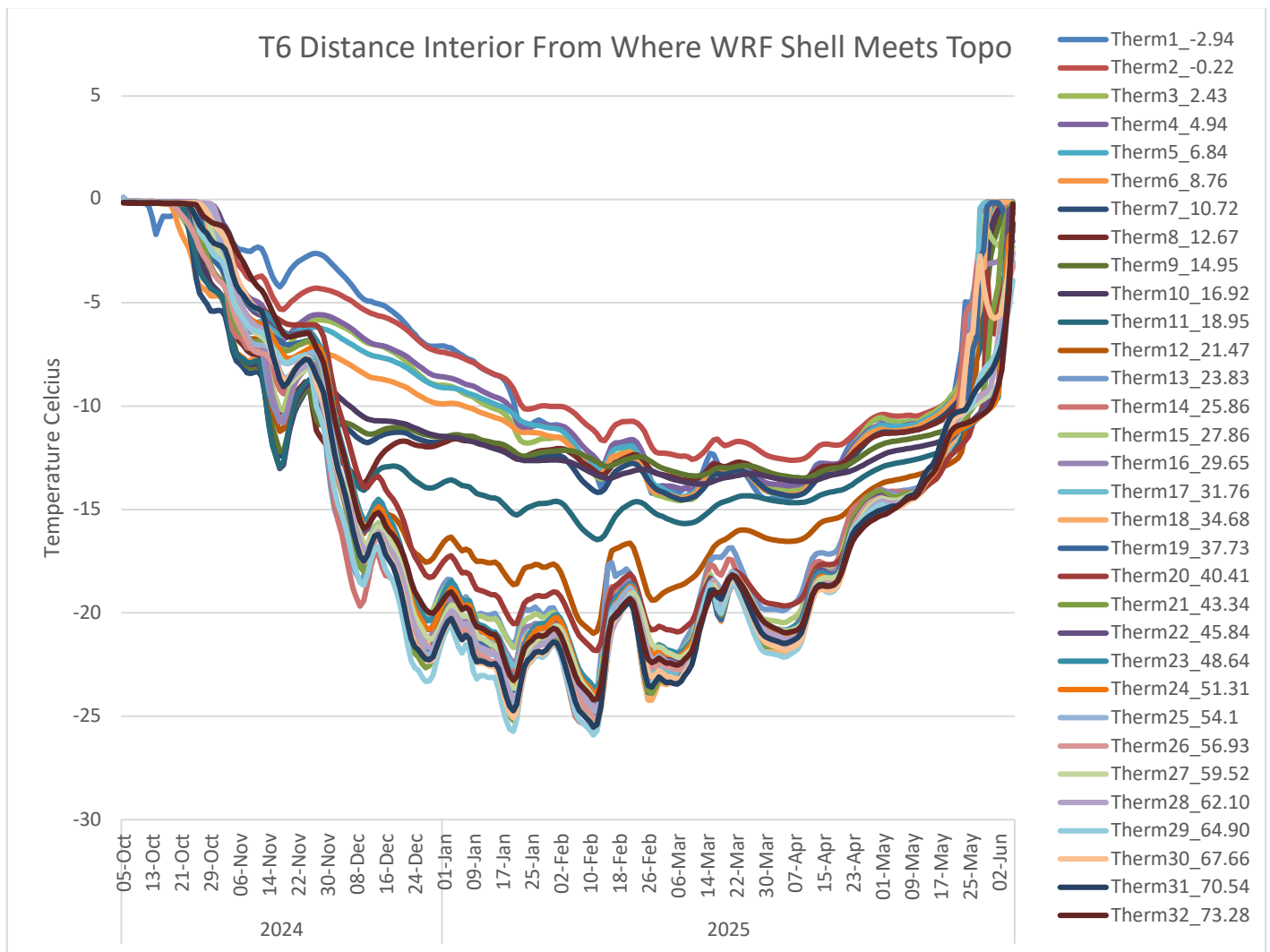
T1: (Legend provides thermistor node depths, presented in m below ground surface (mbgs) at time of installation). Waste rock temperatures at T1 have generally continued to cool over time along the thermistor strings since additional rock was placed in the area in September 2019. The slight increase near surface during Q3 of 2024 compared to Q3 of 2023 can be attributed to warmer air temperatures and precipitation.



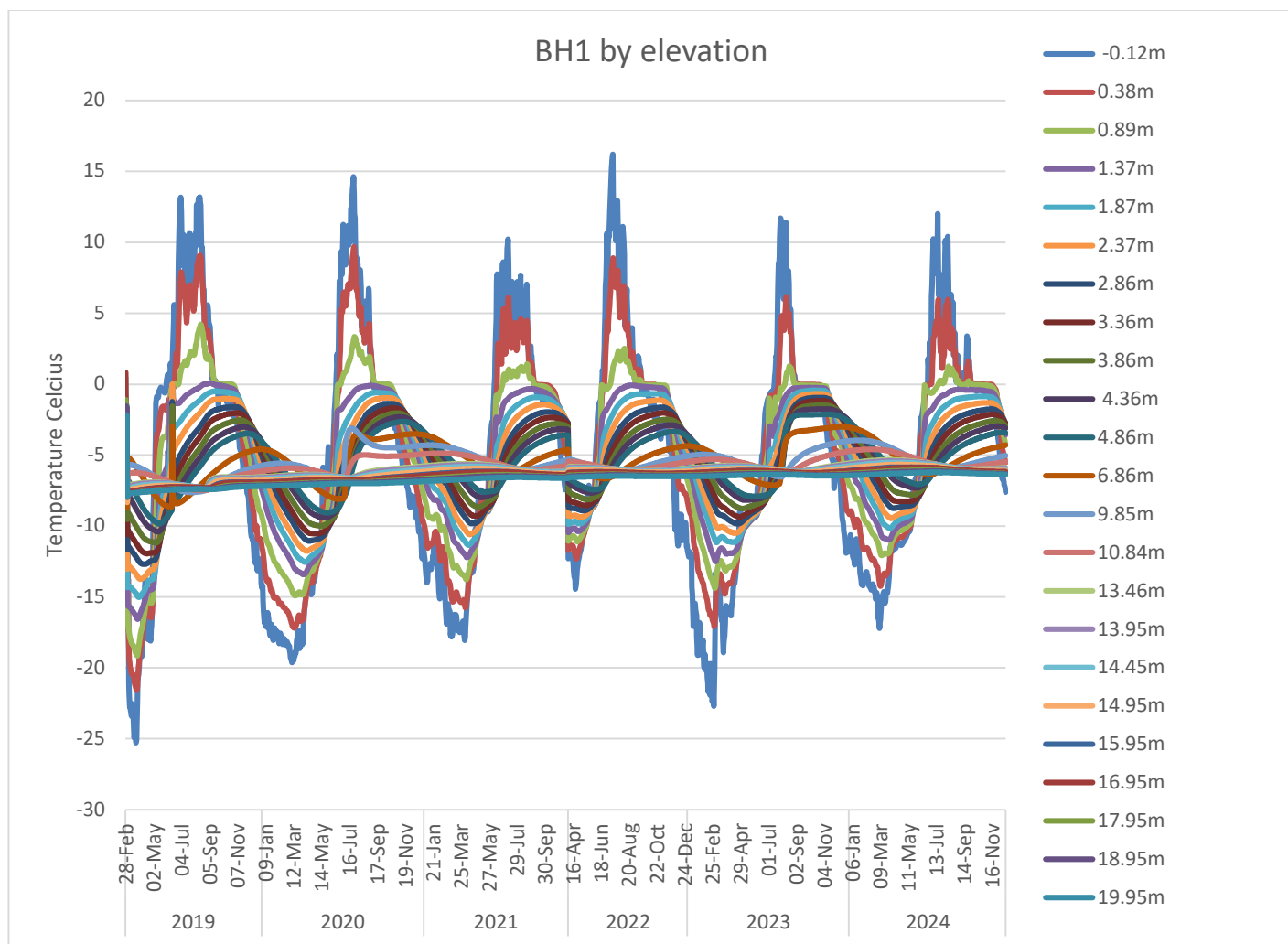
T2: (Legend provides thermistor node depths, presented in m below ground surface (mbgs) at time of installation). Data gaps and errors are consistent in T2 after April 2020. Data provided at intervals without errors indicate that rockfill ≥ 1.93 mbgs remains frozen year-round. Waste rock temperatures at T2 have cooled since the addition of ~ 0.8 m of waste rock placed in the area in summer 2020.



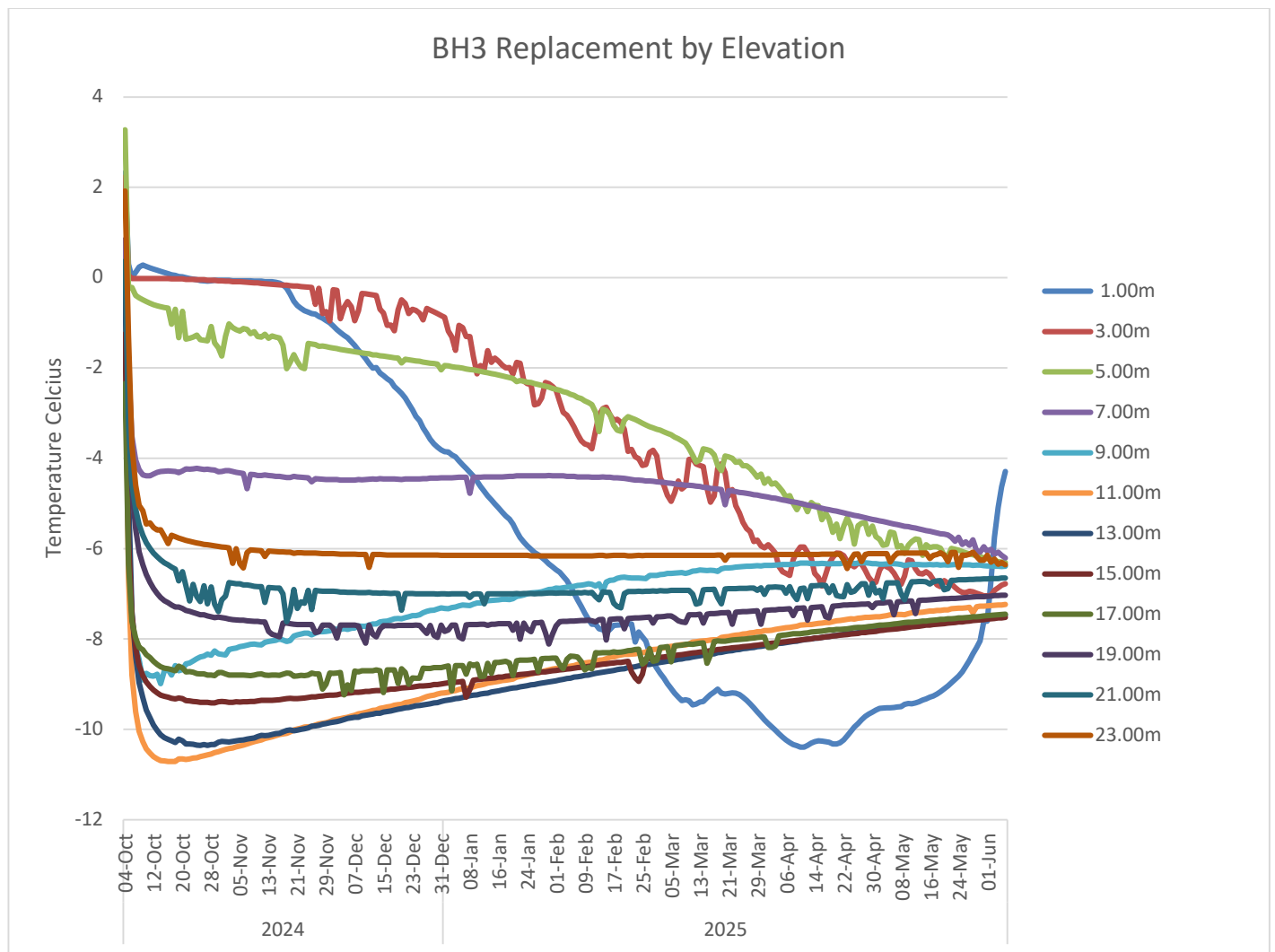
T3: (Legend provides node distance, in meters, along the thermistor string, where zero is at the edge of the pile). Waste placement occurred in 2021 between 16.3 m and 40 m along the length of the thermistor string, and the timing of this waste placement correlates with much of the thermistor data remaining below 0°C and exhibiting much smaller seasonal variations. Overall material placement is allowing the pile to freeze and remain frozen, supporting the overall objective of the WRMP.



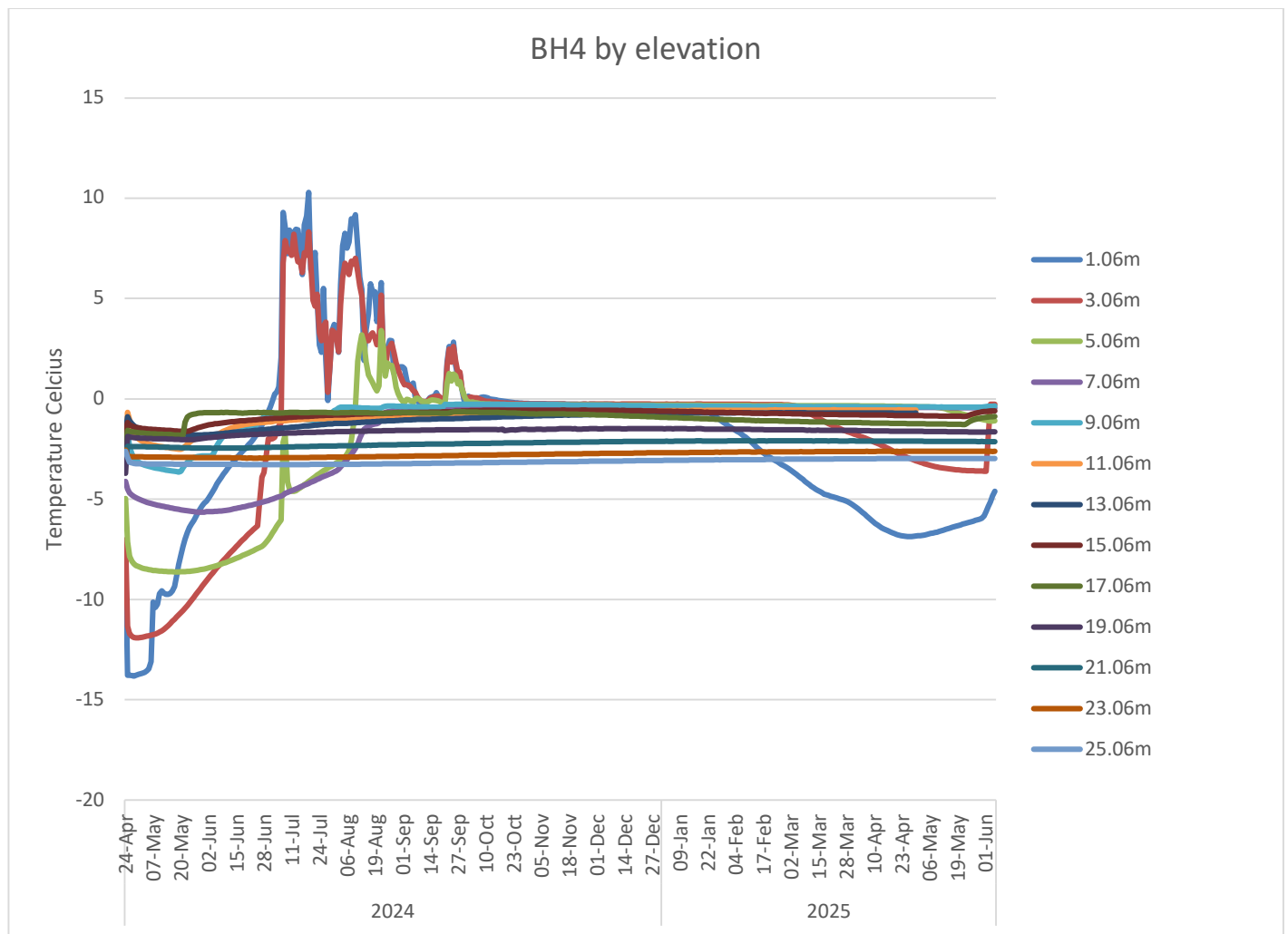
T6: (Legend provides node distance, in meters, along the thermistor string, where zero is at the edge of the pile). Installed in October 2024. The majority of nodes are within the active layer due to frozen ground and the inability to dig below the active layer at the time of installation (this itself points to the success of the WRMP). Additional lifts will be placed during 2025 to provide more valuable data.



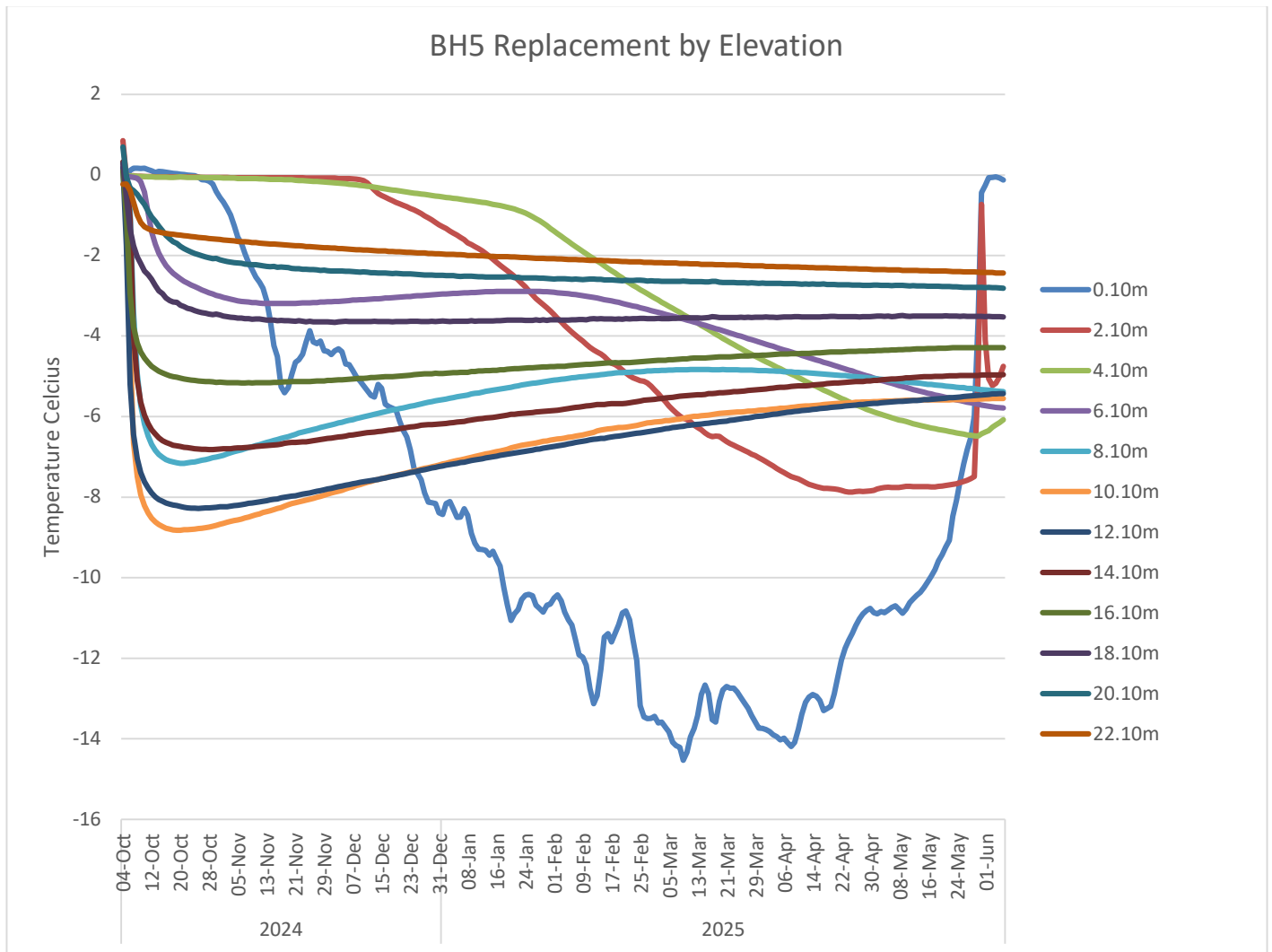
BH1: (Legend provides thermistor node depths, presented in m below ground surface (mbgs) at time of installation). No material placement has occurred on top of BH1 since its installation. Thermistor data at BH1 continues to support the conclusion that the active layer subject to seasonal freezing and thawing is < 3 m, with BH1 data indicating everything below 2 m is frozen year-round.



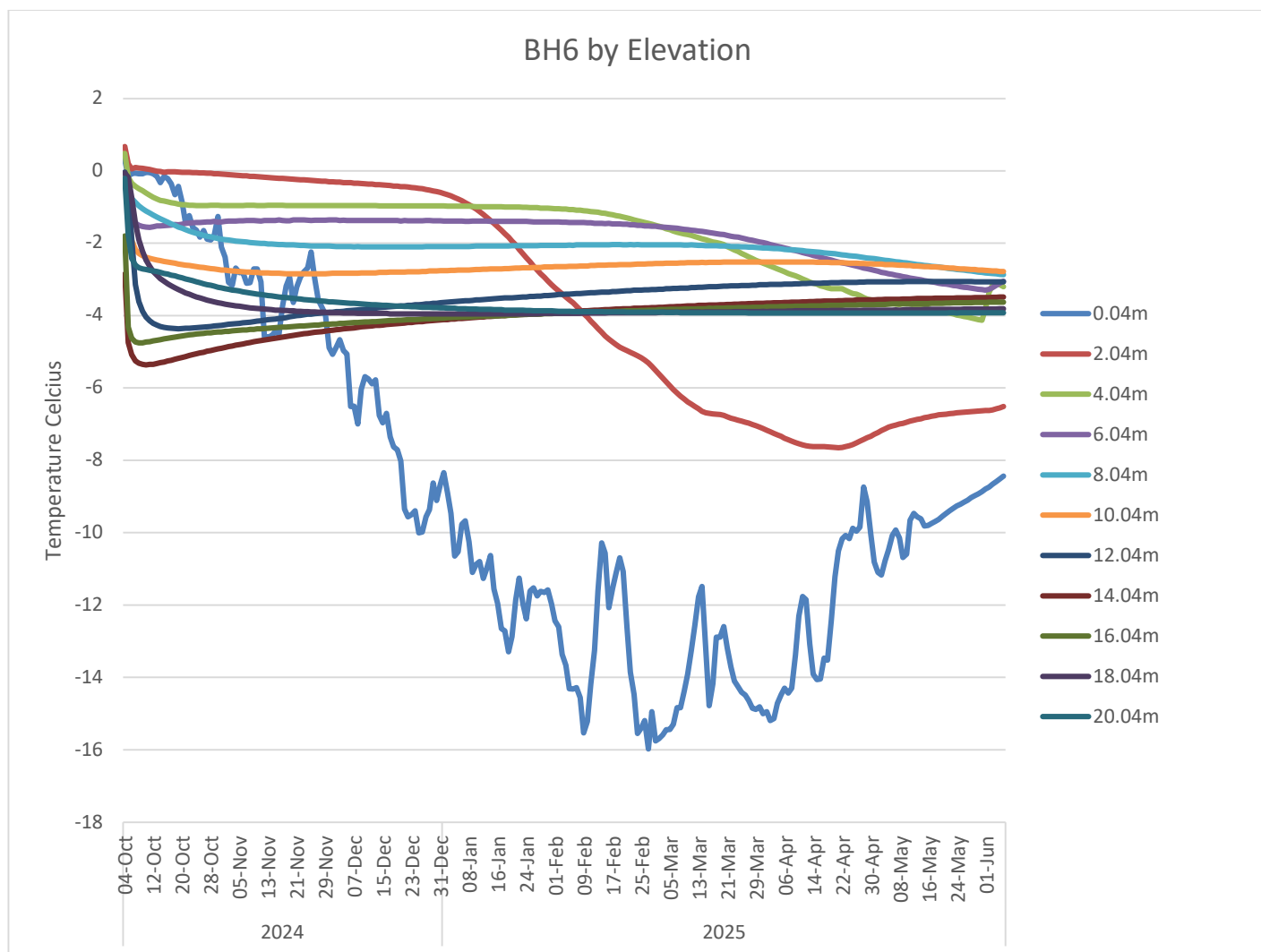
BH3R: (Legend provides thermistor node depths, presented in m below ground surface (mbgs) at time of installation). Installed in October 2024. No material placement has occurred on top of BH3R since its installation. Thermistor data at BH3R is in its infancy, data collection will continue throughout 2025.



BH4: (Legend provides thermistor node depths, presented in m below ground surface (mbgs) at time of installation). Installed in April 2024. Material has been placed on top of BH4 during Q2 of 2025. The thermistor is still stabilising, data collection will continue throughout 2025.



BH5R: (Legend provides thermistor node depths, presented in m below ground surface (mbgs) at time of installation). Installed in October 2024. No material placement has occurred on top of BH5R since its installation. Thermistor data at BH5R is in its infancy, data collection will continue throughout 2025.



BH6: (Legend provides thermistor node depths, presented in m below ground surface (mbgs) at time of installation). Installed in October 2024, solely in Potentially Acid Generating rock, as an additional test. No material placement has occurred on top of BH6 since its installation. Thermistor data at BH6 is in its infancy, data collection will continue throughout 2025.

APPENDIX E.13.1D

As-Built Report

2024 Mary River WRF WTP Geotube® Pond Replacement

Originally submitted to the **QIA in the Baffinland 2020 Work Plan**, construction for a new Geotube pond at the WRF WTP was planned for early summer 2024 (Specifically described as Work Plan item 2020-4: Expansion of the Waste Rock Facility Water Treatment Plant to include an additional Geotube settling containment area. Total footprint of new lined area is 3,000 m³).

During preparatory work to remove the existing full Geotube, the liner within the Geotube pond was damaged. It was then determined that an additional or expanded pond may not be necessary. Instead, a new liner and Geotube were installed in the existing pond.

Construction began on June 20, with the removal of the full Geotube from within the pond. From June 21-30, work was completed to replace the pond liner (damaged during Geotube removal). Construction was completed on June 30 with the new Geotube professionally installed within the newly replaced liner in the pond, complete with QA/QC. Construction took place within the existing disturbance footprint and not at the location identified below as Work Plan item **2020-4** (Figure D1).

An As-built figure of the completed maintenance presented as Figure D2.

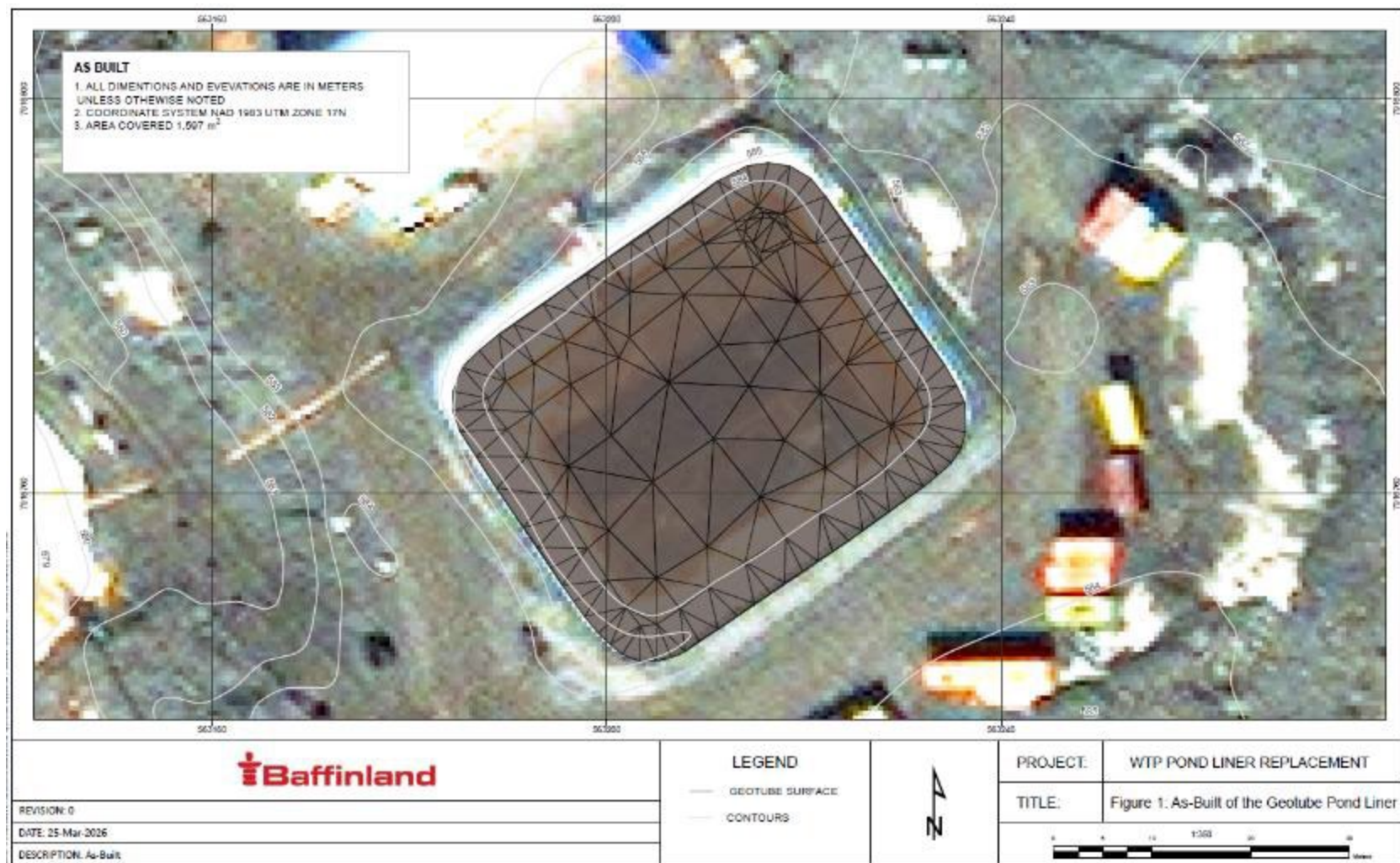
Photo journal of construction progress is presented in Addendum 1.

QA/QC Report, Final inspection, and Certificate of Subgrade from Layfield are presented in Addendum 2.

Figure D1: Location of Work Plan Item 2020-4



Figure D2: As-Built figure of completed Geotube® pond re-lining (2024)



Addendum 1 – Construction Progress Photo Journal

WRF KM110 WTP Geotube® Pond Maintenance - 2024



Photo 1. Geotube® Replacement at the Waste Rock Facility Water Treatment Plant - June



Photo 2. Geotube® Replacement Completed at the Waste Rock Facility Water Treatment Plant - August



Photo 3. Geotube® removed and liner damaged – June 21

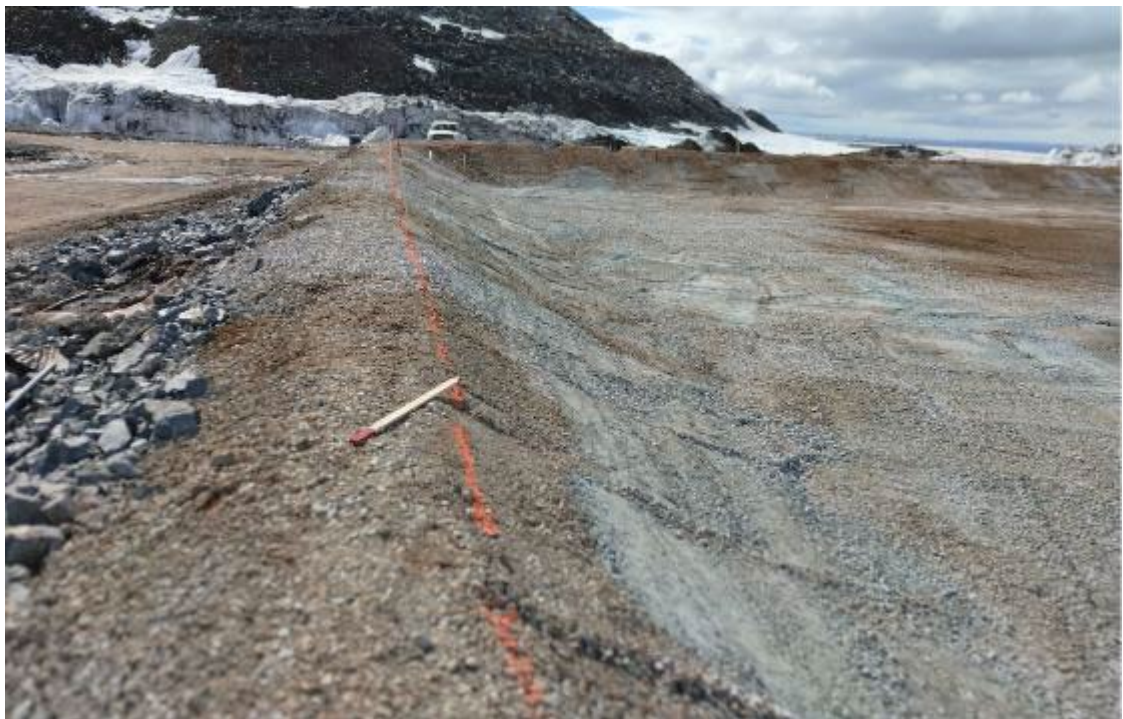


Photo 4. Liner removed and Subgrade work ongoing – June 25



Photo 5. Subgrade covered by non-woven Geotextile Cloth – June 28



Photo 6. Liner installation begins – June 28



Photo 7. Liner Installation Nearly Complete - June 30



Photo 8. Liner tie-in complete and Geotube® installed – June 30

Addendum 2 – Layfield QA/QC, Final Inspection, and Certificate of Subgrade



LAYFIELD

Canada

Project Completion QA/QC Package For

Baffinland Geotube Laydown Liner Replacement

Baffin Island, NU

c/o

Baffinland

Install EL6060 for Geotube Laydown Liner Replacement

Prepared By: Roshan Patel

Reviewed By: Mark Tymecki

Date Revised: August 6, 2024

Layfield Canada Ltd.

Table of Contents
for
**Baffinland Geotube
Laydown
Liner Replacement**
Baffin Island, NU
c/o
Baffinland

Primary Layer

1) Certificate of Inspection of Soil Subgrade Surface	1 pg.
2) Geomembrane Deployment Log	3 pgs.
3) Geomembrane Seam & Test Log	3 pgs.
4) Geomembrane Detail & Test Log	1 pg.
5) Geomembrane Destruct Log	1 pg.
6) As-built	1 pg.
7) Certificate of Final Inspection and Acceptance	1 pg.

Other Documents

1) Geosynthetics Inventory Log	1 pg.
--------------------------------	-------



Primary Layer

CERTIFICATE OF SUBGRADE SURFACE INSPECTION

PROJECT NAME: Baffinland Geotube Laydown Liner

PROJECT NUMBER: CT002020

OWNER/CONTRACTOR: Baffinland

LOCATION: _____

I, the undersigned, a duly appointed representative of Layfield Canada Ltd. (Layfield), have visually observed the subgrade surface described below, and:

- ☒ found it to be an Acceptable surface on which to install geomembrane; OR
☐ found it to be an Unacceptable surface on which to install geomembrane

Area Inspected (☐ Partial or ☒ Complete): Geotube Laydown

Dimensions of Subgrade Inspection: 49m x 41m

Anchor Trench Dimensions: 0.5m x 0.5m

Comments: Measurements are approximate.

This certification is based on observations of the surface of the subgrade only. No subterranean inspections or tests have been performed by Layfield and Layfield makes no representations or warranties regarding conditions which may exist below the surface of the subgrade. Layfield accepts no responsibility for conformance of the subgrade to this project's specifications.

The subgrade inspected on this date refers to its present condition. Any changes in the subgrade condition that result from the effects of inclement weather and/or other forces beyond the control of Layfield and remedial work to correct the resulting deficiencies, will be the direct responsibility of the General Contractor.

LAYFIELD REPRESENTATIVE:

Date: June 28, 2024

Signature: [Signature]

Name: Ryan Rollier

Title: Field Installation Technician

OWNERS REPRESENTATIVE:

I, the undersigned, a duly appointed representative of the Owner, hereby understand the subgrade surface inspection described above and authorize Layfield to proceed with deployment of geosynthetics on the subgrade provided.

Date: June 28, 2024

Signature: [Signature]

Name: Michael Burns

Title: Construction Manager

Company: Bullitt Staffing for Bim.



GEOMEMBRANE DEPLOYMENT LOG

PROJECT NUMBER CT002020
PROJECT TITLE Baffinland Geotube Laydown Liner Replacement

AREA / LAYER Primary
DEPLOYMENT DATE 2024/06/28

PANEL NUMBER	ROLL NUMBER	LENGTH (m)	WIDTH (m)	AIR TEMP °C	PANEL CONDITION	CHECKE D BY	SUBGRADE CONDITION
1	Roll number not available	21	6.8	3	Good	RR	Good
2	Roll number not available	21	6.8	3	Good	RR	Good

TOTAL PAGE AREA 285.6 m²

LS-10-QF-002

www.layfieldcontainment.com

QC TECH Ryan Rollier
SUPERVISOR Ryan Rollier
SUBMISSION DATE 07.04.2024
SHEET NUMBER 1 of 3



GEOMEMBRANE DEPLOYMENT LOG

PROJECT NUMBER CT002020

AREA / LAYER Primary

PROJECT TITLE Baffinland Geotube Laydown Liner Replacement

DEPLOYMENT DATE 2024/06/29

PANEL NUMBER	ROLL NUMBER	LENGTH (m)	WIDTH (m)	AIR TEMP °C	PANEL CONDITION	CHECKED BY	SUBGRADE CONDITION
3	Roll number not available	18	6.8	3	Good	RR	Good
4	Roll number not available	24	6.8	3	Good	RR	Good
5	Roll number not available	24	6.8	3	Good	RR	Good
6	Roll number not available	18	6.8	3	Good	RR	Good
7	Roll number not available	22.5	6.8	3	Good	RR	Good
8	Roll number not available	19.5	6.8	3	Good	RR	Good
9	Roll number not available	17	6.8	3	Good	RR	Good
10	Roll number not available	2	6.8	8	Good	RR	Good
11	Roll number not available	23	6.8	8	Good	RR	Good
12	Roll number not available	8.5	6.8	8	Good	RR	Good
13	Roll number not available	8.5	6.8	8	Good	RR	Good
14	Roll number not available	8.5	6.8	8	Good	RR	Good
15	Roll number not available	8.5	6.8	8	Good	RR	Good
16	Roll number not available	8.5	6.8	8	Good	RR	Good
17	Roll number not available	8.5	6.8	8	Good	RR	Good
18	Roll number not available	8	6.8	8	Good	RR	Good
19	Roll number not available	8	6.8	8	Good	RR	Good
20	Roll number not available	8	6.8	8	Good	RR	Good
21	Roll number not available	8	6.8	8	Good	RR	Good
22	Roll number not available	8	6.8	8	Good	RR	Good

TOTAL PAGE AREA 1761.2 m²



GEOMEMBRANE DEPLOYMENT LOG

PROJECT NUMBER CT002020
PROJECT TITLE Baffinland Geotube Laydown Liner Replacement

AREA / LAYER Primary
DEPLOYMENT DATE 2024/06/29

PANEL NUMBER	ROLL NUMBER	LENGTH (m)	WIDTH (m)	AIR TEMP °C	PANEL CONDITION	CHECKE D BY	SUBGRADE CONDITION
23	Roll number not available	8	6.8	8	Good	RR	Good

TOTAL PAGE AREA 54.4 m²

LS-10-QF-002

www.layfieldcontainment.com

QC TECH Ryan Rollier
SUPERVISOR Ryan Rollier
SUBMISSION DATE 07.04.2024
SHEET NUMBER 3 of 3



GEOMEMBRANE SEAM & TEST LOG

PROJECT NUMBER CT002020 AREA / LAYER Primary
PROJECT TITLE Baffinland Geotube Laydown Liner Replacement SEAM DATE 2024/06/28

TRIAL SEAMS																							
#	MACHINE NUMBER	TIME	TECH	AIR TEMP °C	SPEED	TEMP/ SETTING	INSIDE PEEL (PPI)					OUTSIDE PEEL (PPI)					SHEAR (PPI)					CHK' D BY	LINER TO LINER TYPE AND REMARKS
1	WW053	1345	RR	3	45.0%	460°C	116	114	117	118	118	115	110	111	119	116	144	147	149	146	151	RR	

WELD SEAMS									QC		AIR PRESSURE TEST (PSI)				VERIFY	
PANEL NUMBERS	SEAM SECTION		START TIME	AIR TEMP °C	WELD TECH	MACHINE NUMBER	WELD LENGTH	DESTRUCT NUMBER	TEST METH.	TEST DATE Y-M-D	TIME		PRESSURE		PASS	QC TECH
	FROM	TO									START	END	START	END		
1 / 2	WEOS	EEOS	1400	3	RR	WW053	6.8		AP+PS	2024-06-30	815	820	40	40	Yes	RR
/																

PAGE TOTAL 6.8

TEST METHOD

AL - AIR LANCE	ST - SPARK TEST
AP - AIR PRESSURE	VB - EXTRUDED
PS - POINT STRESS	& VAC BOX

LS-10-QF-004

REMARKS:

www.layfieldcontainment.com

QC TECH Ryan Rollier
SUPERVISOR Ryan Rollier
SUBMISSION DATE 07.04.2024
SHEET NUMBER 1 of 3



GEOMEMBRANE SEAM & TEST LOG

PROJECT NUMBER CT002020 AREA / LAYER Primary
PROJECT TITLE Baffinland Geotube Laydown Liner Replacement SEAM DATE 2024/06/29

TRIAL SEAMS																							
#	MACHINE NUMBER	TIME	TECH	AIR TEMP °C	SPEED	TEMP/ SETTING	INSIDE PEEL (PPI)					OUTSIDE PEEL (PPI)					SHEAR (PPI)					CHK' D BY	LINER TO LINER TYPE AND REMARKS
1	WW053	905	RR	1	40.0%	460°C	122	134	123	131	123	120	134	120	136	122	145	149	146	151	148	RR	
2	WW053	1335	RR	8	45.0%	460°C	117	116	116	119	115	116	115	115	120	114	142	146	146	154	149	RR	

WELD SEAMS									QC		AIR PRESSURE TEST (PSI)				VERIFY	
PANEL NUMBERS	SEAM SECTION		START TIME	AIR TEMP °C	WELD TECH	MACHINE NUMBER	WELD LENGTH	DESTRUCT NUMBER	TEST METH.	TEST DATE Y-M-D	TIME		PRESSURE		PASS	QC TECH
	FROM	TO									START	END	START	END		
3 / 4	WEOS	EEOS	935	1	RR	WW053	6.8		AP+PS	2024-06-29	1920	1925	40	40	Yes	RR
1 / 3	NEOS	SEOS	940	1	RR	WW053	17.2		AP+PS	2024-06-29	1920	1925	40	40	Yes	RR
2 / 4	NEOS	SEOS	940	1	RR	WW053	2.0		AP+PS	2024-06-29	1920	1925	40	40	Yes	RR
2 / 4	NEOS	SEOS	940	1	RR	WW053	23.3		AP+PS	2024-06-29	1925	1930	40	40	Yes	RR
5 / 6	WEOS	EEOS	1018	1	RR	WW053	6.8		AP+PS	2024-06-29	1912	1917	40	40	Yes	RR
3 / 5	NEOS	SEOS	1028	1	RR	WW053	18.0		AP+PS	2024-06-29	1905	1910	40	40	Yes	RR
4 / 5	NEOS	SEOS	1028	1	RR	WW053	6.0		AP+PS	2024-06-29	1905	1910	40	40	Yes	RR
4 / 6	NEOS	SEOS	1028	1	RR	WW053	18.0		AP+PS	2024-06-29	1905	1910	40	40	Yes	RR
7 / 8	WEOS	EEOS	1137	1	RR	WW053	6.8		AP+PS	2024-06-29	1856	1901	40	40	Yes	RR
5 / 7	NEOS	SEOS	1143	1	RR	WW053	22.8	DS-1	AP+PS	2024-06-29	1856	1901	40	40	Yes	RR
6 / 8	NEOS	SEOS	1143	1	RR	WW053	18.0		AP+PS	2024-06-29	1856	1901	40	40	Yes	RR
8 / 11	NEOS	SEOS	1217	5	RR	WW053	19.2		AP+PS	2024-06-29	1836	1841	40	40	Yes	RR
7 / 9	NEOS	SEOS	1231	5	RR	WW053	17.4		AP+PS	2024-06-29	1836	1841	40	40	Yes	RR
7 / 11	NEOS	SEOS	1231	5	RR	WW053	5.0		AP+PS	2024-06-29	1836	1841	40	40	Yes	RR
10 / 11	WEOS	EEOS	1252	1	RR	WW053	6.8		AP+PS	2024-06-29	1827	1832	40	40	Yes	RR
9 / 10	WEOS	EEOS	1300	1	RR	WW053	6.8		AP+PS	2024-06-29	1827	1832	40	40	Yes	RR
12 / 13	EEOS	WEOS	1345	8	RR	WW053	8.2		AP+PS	2024-06-29	1810	1815	40	40	Yes	RR
13 / 14	EEOS	WEOS	1400	8	RR	WW053	8.1		AP+PS	2024-06-29	1815	1820	40	40	Yes	RR
14 / 15	EEOS	WEOS	1411	8	RR	WW053	8.2		AP+PS	2024-06-29	1815	1820	40	40	Yes	RR
15 / 16	EEOS	WEOS	1421	8	RR	WW053	8.4		AP+PS	2024-06-29	1820	1825	40	40	Yes	RR

PAGE TOTAL 233.8

TEST METHOD AL - AIR LANCE ST - SPARK TEST
AP - AIR PRESSURE VB - EXTRUDED
PS - POINT STRESS & VAC BOX

REMARKS:

QC TECH Ryan Rollier
SUPERVISOR Ryan Rollier
SUBMISSION DATE 07.04.2024
SHEET NUMBER 2 of 3

LS-10-QF-004

www.layfieldcontainment.com



GEOMEMBRANE SEAM & TEST LOG

PROJECT NUMBER CT002020 AREA / LAYER Primary
PROJECT TITLE Baffinland Geotube Laydown Liner Replacement SEAM DATE 2024/06/29

TRIAL SEAMS																							
#	MACHINE NUMBER	TIME	TECH	AIR TEMP °C	SPEED	TEMP/ SETTING	INSIDE PEEL (PPI)					OUTSIDE PEEL (PPI)					SHEAR (PPI)					CHK' D BY	LINER TO LINER TYPE AND REMARKS
1	WW053	905	RR	1	40.0%	460°C	122	134	123	131	123	120	134	120	136	122	145	149	146	151	148	RR	
2	WW053	1335	RR	8	45.0%	460°C	117	116	116	119	115	116	115	115	120	114	142	146	146	154	149	RR	

WELD SEAMS									QC		AIR PRESSURE TEST (PSI)				VERIFY	
PANEL NUMBERS	SEAM SECTION		START TIME	AIR TEMP °C	WELD TECH	MACHINE NUMBER	WELD LENGTH	DESTRUCT NUMBER	TEST METH.	TEST DATE Y-M-D	TIME		PRESSURE		PASS	QC TECH
	FROM	TO									START	END	START	END		
16 / 17	EEOS	WEOS	1505	8	RR	WW053	8.4	DS-2	AP+PS	2024-06-29	1825	1830	40	40	Yes	RR
9 / 17	NEOS	SEOS	1522	8	RR	WW053	6.7		AP+PS	2024-06-29	1825	1830	40	40	Yes	RR
9 / 16	NEOS	SEOS	1522	8	RR	WW053	6.8		AP+PS	2024-06-29	1820	1825	40	40	Yes	RR
9 / 15	NEOS	SEOS	1522	8	RR	WW053	2.6		AP+PS	2024-06-29	1820	1825	40	40	Yes	RR
11 / 15	NEOS	SEOS	1522	8	RR	WW053	2.0		AP+PS	2024-06-29	1815	1820	40	40	Yes	RR
11 / 14	NEOS	SEOS	1522	8	RR	WW053	6.8		AP+PS	2024-06-29	1815	1820	40	40	Yes	RR
11 / 13	NEOS	SEOS	1522	8	RR	WW053	6.8		AP+PS	2024-06-29	1810	1815	40	40	Yes	RR
11 / 12	NEOS	SEOS	1522	8	RR	WW053	6.6		AP+PS	2024-06-29	1810	1815	40	40	Yes	RR
18 / 19	WEOS	EEOS	1605	8	RR	WW053	8.0		AP+PS	2024-06-30	821	826	40	40	Yes	RR
19 / 20	WEOS	EEOS	1618	8	RR	WW053	7.9		AP+PS	2024-06-30	842	847	40	40	Yes	RR
20 / 21	WEOS	EEOS	1634	8	RR	WW053	8.0		AP+PS	2024-06-30	828	833	40	40	Yes	RR
22 / 23	WEOS	EEOS	1640	8	RR	WW053	7.8		AP+PS	2024-06-30	842	847	40	40	Yes	RR
21 / 22	WEOS	EEOS	1646	8	RR	WW053	8.0		AP+PS	2024-06-30	835	840	40	40	Yes	RR
2 / 23	SEOS	NEOS	1729	8	RR	WW053	6.8		AP+PS	2024-06-30	835	840	40	40	Yes	RR
2 / 22	SEOS	NEOS	1729	8	RR	WW053	6.8		AP+PS	2024-06-30	835	840	40	40	Yes	RR
2 / 21	SEOS	NEOS	1729	8	RR	WW053	6.7		AP+PS	2024-06-30	828	833	40	40	Yes	RR
1 / 20	SEOS	NEOS	1729	8	RR	WW053	6.4		AP+PS	2024-06-30	828	833	40	40	Yes	RR
1 / 19	SEOS	NEOS	1729	8	RR	WW053	6.4		AP+PS	2024-06-30	821	826	40	40	Yes	RR
1 / 18	SEOS	NEOS	1729	8	RR	WW053	6.8	DS-3	AP+PS	2024-06-30	821	826	40	40	Yes	RR
/																

PAGE TOTAL 126.3

TEST METHOD AL - AIR LANCE ST - SPARK TEST
AP - AIR PRESSURE VB - EXTRUDED
PS - POINT STRESS & VAC BOX

REMARKS:

QC TECH Ryan Rollier
SUPERVISOR Ryan Rollier
SUBMISSION DATE 07.04.2024
SHEET NUMBER 3 of 3



GEOMEMBRANE DETAIL & TEST LOG

PROJECT NUMBER CT002020 AREA / LAYER Primary
PROJECT TITLE Baffinland Geotube Laydown Liner Replacement

TRIAL SEAMS																			
#	MACHINE NUMBER	DATE YYYY-MM-DD	TIME	WELD TECH	AIR TEMP °C	PREHEAT TEMP °C	EXTRUDER TEMP °C	PEEL (PPI)					SHEAR (PPI)					CHK'D BY	REMARKS
1	EX039	2024/06/29	1800	RR	8	251°C	251°C	90	87	92	91	89	94	96	96	91	94	RR	
2																			

DETAIL CODE	PANEL NUMBER(S)	LOCATION DESCRIPTION	DETAIL TYPE	REPAIR TYPE	MACHINE NUMBER	REPAIR DATE YYYY-MM-DD	START TIME	WELD TECH	AIR TEMP °C	TEST DATE YYYY-MM-DD	TEST METH.	QC TECH
1A	12 / 13	P11 Intersection	T	G&W	EX039	2024/06/29	1802	RR	8	2024/06/29	VB+PS	RR
1B	13 / 14	P11 Intersection	T	G&W	EX039	2024/06/29	1803	RR	8	2024/06/29	VB+PS	RR
1C	14 / 15	P11 Intersection	T	G&W	EX039	2024/06/29	1804	RR	8	2024/06/29	VB+PS	RR
1D	9 / 10	P10/P11, P15 Intersection	T	G&W	EX039	2024/06/29	1806	RR	8	2024/06/29	VB+PS	RR
1E	15 / 16	P9 Intersection	T	G&W	EX039	2024/06/29	1807	RR	8	2024/06/29	VB+PS	RR
1F	16 / 17	P9 Intersection	T	G&W	EX039	2024/06/29	1808	RR	8	2024/06/29	VB+PS	RR
1G	9 / 10	P10/P11, P7 Intersection	T	G&W	EX039	2024/06/29	1820	RR	8	2024/06/29	VB+PS	RR
1H	7 / 8	P11 Intersection	T	G&W	EX039	2024/06/29	1830	RR	8	2024/06/29	VB+PS	RR
1I	7 / 8	P5/P6 Intersection	T	G&W	EX039	2024/06/29	1840	RR	8	2024/06/29	VB+PS	RR
1J	5 / 5	1.2m from SW corner of panel	D	P	EX039	2024/06/29	1843	RR	8	2024/06/29	VB+PS	RR
1K	5 / 6	P4 Intersection	T	G&W	EX039	2024/06/29	1844	RR	8	2024/06/29	VB+PS	RR
1L	3 / 4	P5 Intersection	T	G&W	EX039	2024/06/29	1847	RR	8	2024/06/29	VB+PS	RR
1M	2 / 4	23m from SEOS	IO	G&W	EX039	2024/06/29	1849	RR	8	2024/06/29	VB+PS	RR
1N	1 / 2	P3/P4 Intersection	T	G&W	EX039	2024/06/29	1852	RR	8	2024/06/29	VB+PS	RR
1O	18 / 19	P1 Intersection	T	G&W	EX039	2024/06/29	1940	RR	8	2024/06/29	VB+PS	RR
1P	19 / 20	P1 Intersection	T	G&W	EX039	2024/06/29	1945	RR	8	2024/06/29	VB+PS	RR
1Q	20 / 21	P1/P2 Intersection	T	G&W	EX039	2024/06/29	1950	RR	8	2024/06/29	VB+PS	RR
1R	21 / 22	P2 Intersection	T	G&W	EX039	2024/06/29	2000	RR	8	2024/06/29	VB+PS	RR
1S	22 / 23	P2 Intersection	T	G&W	EX039	2024/06/29	2014	RR	8	2024/06/29	VB+PS	RR
	/											

DETAIL TYPE:	AD - ANIMAL DAMAGE ATL - AIR TEST LEAK BO - FUSION WELDER BURN CR - CREASE D - INSTALLATION DAMAGE	DS - DESTRUCT SAMPLE NUMBER EE - EARTHWORK EQUIPMENT DAMAGE EXT - EXTENSION FM - FISHMOUTH FS - FAILED SEAM LENGTH	IO - INSUFFICIENT OVERLAP MD - MANUFACTURER/DELIVERY DAMAGE P - PENETRATION PT - PRESSURE TEST CUT SI - SOIL SURFACE IRREGULARITY	T - THREE PANEL INTERSECTION VL - VACUUM TEST LEAK WR - WRINKLE WS - WELDER RESTART OTHER:
--------------	--	--	---	--

TEST METHOD:	AL - AIR LANCE PS - POINT STRESS	VB - VAC BOX ST - SPARK TEST
--------------	-------------------------------------	---------------------------------

REPAIR TYPE:	G&W - GRIND & WELD HAW - HOT AIR WELD	B - BOOT C - CAP	P - PATCH
--------------	--	---------------------	-----------

REMARKS

LS-10-QF-007

www.layfieldcontainment.com

QC TECH Ryan Rollier
SUPERVISOR Ryan Rollier
SUBMISSION DATE 07.04.2024
SHEET NUMBER 1 of 1



GEOMEMBRANE DESTRUCT LOG

PROJECT NUMBER CT002020
PROJECT TITLE Baffinland Geotube Laydown Liner Replacement

AREA / LAYER Primary
3RD PARTY
ARCHIVE ☐ LAYFIELD ☐ OWNER ☐ ENGINEER ☐

Tensiometer 1 PT7368
Load Cell 1 2023293494 Load Cell 2 2822275926

Tensiometer 2
Load Cell 1 Load Cell 2

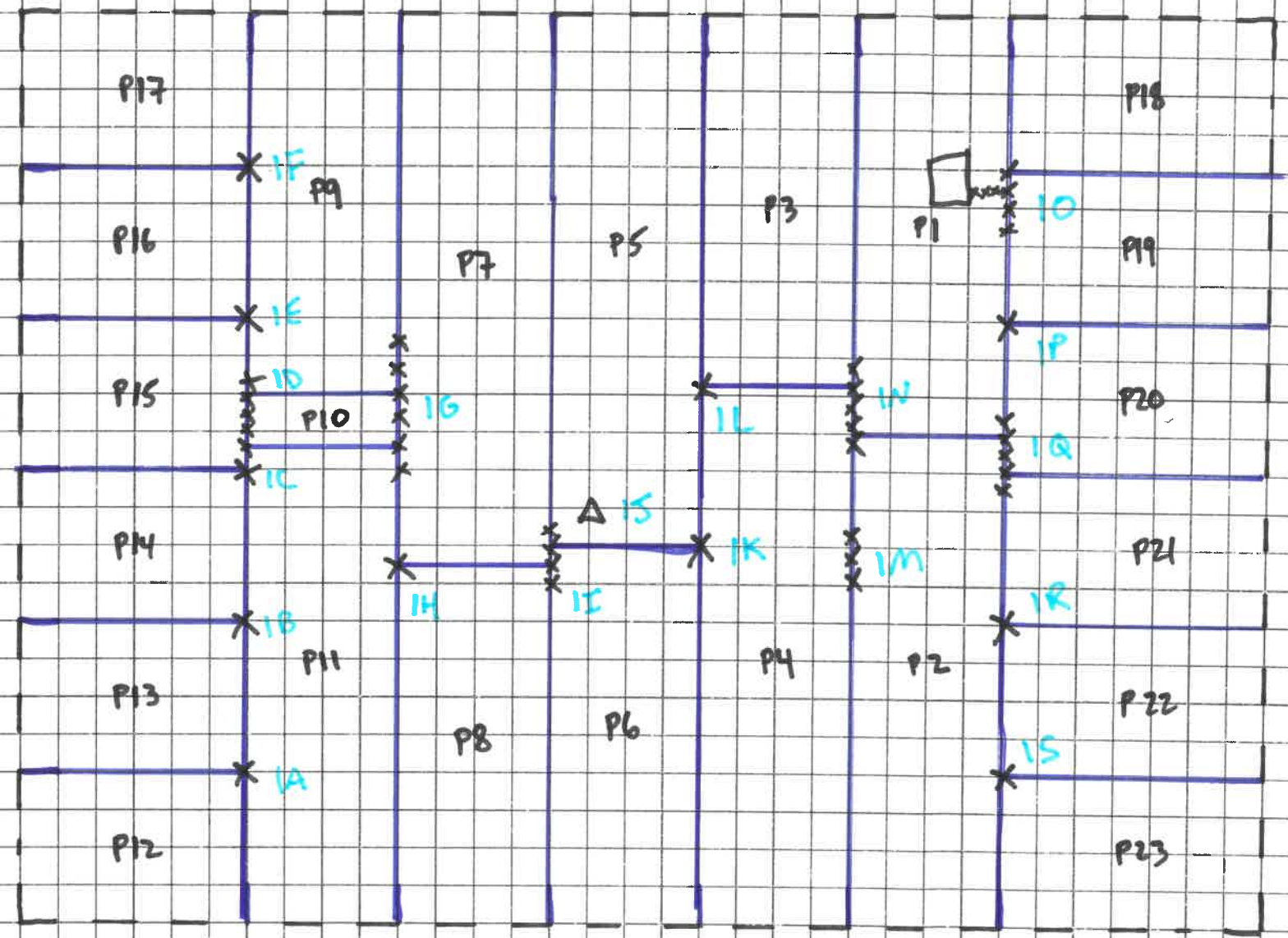
DESTRUCT SAMPLE NUMBER	TYPE OF SEAM	PANEL NUMBERS	TEST DATE YYYY-MM-DD	TEST TEMP °C	INITIALS				INSIDE PEEL STRENGTH (PPI)					OUTSIDE PEEL STRENGTH (PPI)					SHEAR STRENGTH (PPI)				
					3RD PARTY	PRESENT	LAYFIELD	PASS	3RD PARTY	LAB PASS	LOCUS OF BREAK					LOCUS OF BREAK					LOCUS OF BREAK		
SAMPLE LOCATION				4		Yes		114	114	117	116	111	113	114	117	112	119	150	148	146	139	140	
NEOS Cutoff									SE1	SE1	SE1	SE1	SE1	SE1	SE1	SE1	SE1	SE1	SE1	SE1	SE1	SE1	SE1
DS-2	SPF	16/17	2024/06/30	4		Yes		120	121	130	126	119	123	120	125	125	118	147	142	151	137	144	
WEOS Cutoff									SE1	SE1	SE1	SE1	SE1	SE1	SE1	SE1	SE1	SE1	SE1	SE1	SE1	SE1	SE1
DS-3	SPF	1/18	2024/06/30	4		Yes		114	115	119	116	115	111	113	123	112	116	140	152	155	138	143	
NEOS Cutoff									SE1	SE1	SE1	SE1	SE1	SE1	SE1	SE1	SE1	SE1	SE1	SE1	SE1	SE1	SE1

TYPE OF SEAM: SPF - SPLIT FUSION SOF - SOLID FUSION SLV - SOLVENT
EXT - EXTRUSION HAF - HOT AIR FUSION

LS-10-QF-008

www.layfieldcontainment.com

QC TECH Ryan Rollier
SUBMITTED BY Ryan Rollier
SUBMISSION DATE 07.04.2024
SHEET NUMBER 1 of 1



PROJECT NAME
Baffin land
Geotube Laydown
Liner
Replacement
 MATERIAL TYPE
EL 6060



LEGEND
 --- EXTENT OF LINER
 --- TOE OF SLOPE
 --- LINER FIELD SEAM
 --- EXTRUSION WELDING
 xxx
 Δ PATCH
 P2 PANEL NUMBER
 1A REPAIR NUMBER
 □ Sump

Quote No.	PROJECT No.
	CT002020
DWG: 1 OF 1	SCALE: NTS
DWG:	CARD: APPD:
DATE: July 24	REVISION:

CERTIFICATE OF FINAL INSPECTION AND ACCEPTANCE

PROJECT NAME: Baffinland Geotube Laydown Liner
PROJECT NUMBER: CT002020 DATE: June 30, 2024
OWNER: Baffinland
LOCATION: Mary River Mine

Scope of Installation(s): THE WORK

Area/Layer: Primary Area Inspected: ☐ Partial or ☒ Complete
Dimensions: 2009 m² of geotextile + EL6060 liner
Installed. Measurements are approximate

Part 1 – LAYFIELD CANADA LTD.

I, Ryan Rollier, a duly appointed representative of Layfield Canada Ltd. (Layfield), have visually observed the installations (as outlined above), and have found the Work to be complete and free of defects and declare that the Work was completed in accordance with the project specifications, Layfield's QC program and the terms and conditions of the contract.

Layfield Representative:

Name: Ryan Rollier
Title: Field Installation Technician
Date: June 30, 2024 Signature: 

Part 2 – OWNER (or Representative)

I, Michael Burns, a duly appointed representative of Baffinland, do hereby accept and receive the installation(s) described above, and confirm that the work has been completed in accordance with the project specifications and the terms and conditions of the contract.

I have evaluated and measured the work together with the Layfield representative, and agree that the measurements shown are both true and correct, and that the installation has met our approval.

Owners Representative:

Name: Michael Burns
Title: Construction Manager
Company: Baffinland
Date: June 30, 24 Signature: 

Comments:

Welds have been tested as per Layfield's QATOC documents + Ryan has confirmed they all passed




Other Documents



INVENTORY LOG

PROJECT NUMBER CT002020
PROJECT TITLE Baffinland Geotube Laydown Liner Replacement
DATE OF INVENTORY 2024/06/28
PRODUCT TYPE EL6060
MATERIAL MANUFACTURER Layfield

#	ROLL NUMBER	MATERIAL DIMENSIONS			REMARKS
		THICKNESS	LENGTH (m)	WIDTH (m)	
1	Roll number not available	60 mil	160	6.8	
2	Roll number not available	60 mil	25	6.8	
3	Roll number not available	60 mil	25	6.8	
4	Roll number not available	60 mil	25	6.8	
5	Roll number not available	60 mil	25	6.8	
6	Roll number not available	60 mil	25	6.8	
7	Roll number not available	60 mil	25	6.8	
8	Roll number not available	60 mil	25	6.8	
9	Roll number not available	60 mil	25	6.8	
10	Roll number not available	60 mil	25	6.8	
11	Roll number not available	60 mil	25	6.8	
12	Roll number not available	60 mil	25	6.8	
13					

TOTAL PAGE AREA 2958 m²

LS-10-QF-001

www.layfieldcontainment.com

QC TECH Ryan Rollier
SUPERVISOR Ryan Rollier
SUBMISSION DATE 07.04.2024
SHEET NUMBER 1 of 1



CERTIFICATE OF FINAL INSPECTION AND ACCEPTANCE

PROJECT NAME: Baffinland Geotube Laydown Liner
PROJECT NUMBER: CT002020 DATE: June 30, 2024
OWNER: Baffinland
LOCATION: Mary River Mine

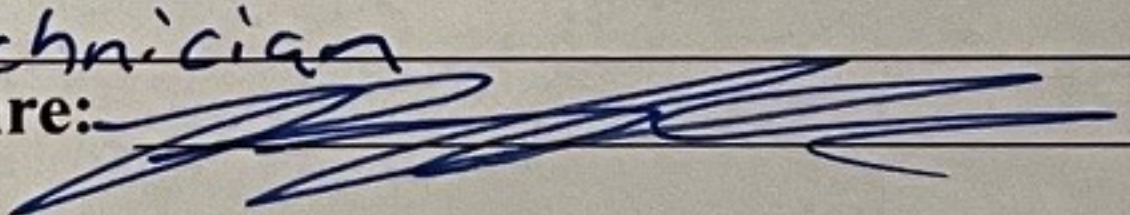
Scope of Installation(s): THE WORK

Area/Layer: Primary Area Inspected: ☐ Partial or ☒ Complete
Dimensions: 2009 m² of geotextile + EL6060 liner
Installed. Measurements are approximate

Part 1 – LAYFIELD CANADA LTD.

I, Ryan Rollie, a duly appointed representative of Layfield Canada Ltd. (Layfield), have visually observed the installations (as outlined above), and have found the Work to be complete and free of defects and declare that the Work was completed in accordance with the project specifications, Layfield's QC program and the terms and conditions of the contract.

Layfield Representative:

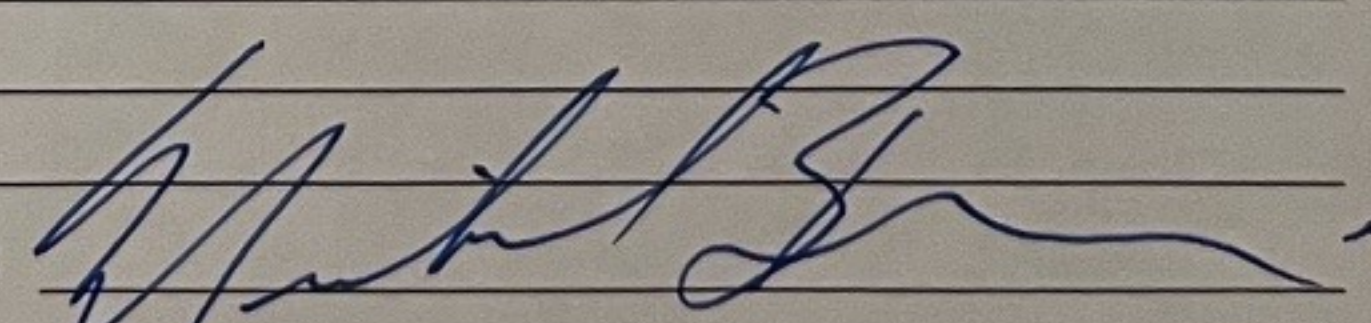
Name: Ryan Rollie
Title: Field Installation Technician
Date: June 30, 2024 Signature: 

Part 2 – OWNER (or Representative)

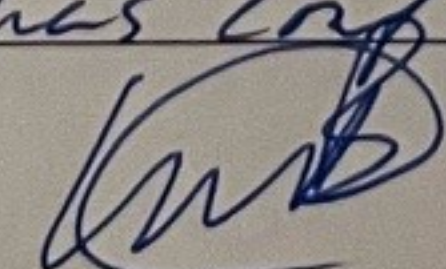
I, Michael Burns, a duly appointed representative of Baffinland, do hereby accept and receive the installation(s) described above, and confirm that the work has been completed in accordance with the project specifications and the terms and conditions of the contract.

I have evaluated and measured the work together with the Layfield representative, and agree that the measurements shown are both true and correct, and that the installation has met our approval.

Owners Representative:

Name: Michael Burns
Title: Construction Manager
Company: Baffinland
Date: June 30, 24 Signature: 

Comments:

-welds have been tested as per layfield's QA/QC documents + Ryan has confirmed they all passed




CERTIFICATE OF SUBGRADE SURFACE INSPECTION

PROJECT NAME: Baffinland Geotube Laydown Liner
PROJECT NUMBER: CTD02020
OWNER/CONTRACTOR: Baffinland
LOCATION: _____

I, the undersigned, a duly appointed representative of Layfield Canada Ltd. (Layfield), have visually observed the subgrade surface described below, and:

- ☒ found it to be an Acceptable surface on which to install geomembrane; OR
☐ found it to be an Unacceptable surface on which to install geomembrane

Area Inspected (☐ Partial or ☒ Complete): Geotube Laydown
Dimensions of Subgrade Inspection: 49m x 41m
Anchor Trench Dimensions: 0.5m x 0.5m
Comments: Measurements are approximate.

This certification is based on observations of the surface of the subgrade only. No subterranean inspections or tests have been performed by Layfield and Layfield makes no representations or warranties regarding conditions which may exist below the surface of the subgrade. Layfield accepts no responsibility for conformance of the subgrade to this project's specifications.

The subgrade inspected on this date refers to its present condition. Any changes in the subgrade condition that result from the effects of inclement weather and/or other forces beyond the control of Layfield and remedial work to correct the resulting deficiencies, will be the direct responsibility of the General Contractor.

LAYFIELD REPRESENTATIVE:

Date: June 28, 2024
Signature: [Signature]
Name: Ryan Rellie
Title: Field Installation Technician

OWNERS REPRESENTATIVE:

I, the undersigned, a duly appointed representative of the Owner, hereby understand the subgrade surface inspection described above and authorize Layfield to proceed with deployment of geosynthetics on the subgrade provided.

Date: June 28, 2024
Signature: [Signature]
Name: Michael Burgess
Title: Construction Manager
Company: Bulldog Staffing for Bua.

APPENDIX E.13.1E

2024 Q4 WRF QA/QC Compliance Report

-See separate secure upload file-

APPENDIX E.13.1F

WSP – 2025 Q4 WRF Assessment

-See separate secure upload file-

APPENDIX E.13.1G

NWB Technical Review of 2024 Annual Report

November 19, 2025



ᓄᓇᓂᓪ ᐃᓕᓕᓂᓪ ᑲᓂᓕᓂᓪ
NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

File No: **2AM-MRY2540**

November 19, 2025

Lou Kamermans
Senior Director, Sustainable Development
Baffinland Iron Mines Corporation
Suite 300 – 2275 Upper Middle Road East
Oakville, Ontario, Canada L6H 0C3

Email: lou.kamermans@baffinland.com

RE: NWB Technical Review of 2024 Annual Report for the Mary River Project; Water Licence No: 2AM-MRY2540 – Baffinland Iron Mines Corporation

Dear Lou Kamermans:

The Nunavut Water Board (NWB or Board) has completed the technical review of the 2024 Annual Report for the type A Water Licence No: 2AM-MRY2540 (Licence), submitted on March 31, 2025 by Baffinland Iron Mines Corporation (Baffinland or Licensee) as a requirement under Part B of the Licence.

On April 16, 2025, the NWB acknowledged receipt of the Annual Report and provided it to the Mary River distribution list for public review with a deadline set for July 16, 2025. Submissions were received from Qikiqtani Inuit Association (QIA), Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC), Environment and Climate Change Canada (ECCC), and Fisheries and Oceans Canada (DFO) on or before July 16, 2025.

Baffinland provided response to comments on October 2, 2025. DFO advised that they have no concerns with Baffinland's responses to their comments. CIRNAC and ECCC submitted their reply on October 24, 2025, to Baffinland's response on their initial comments. The NWB did not receive confirmation from QIA whether Baffinland's response to comments addressed their comments and/or concerns.

Copies of all documents received can be accessed through the NWB's Public Registry site using the following link:

[https://public.nwb-oen.ca/registry/2%20MINING%20MILLING/2A/2AM%20-%20Mining/2AM-MRY2540%20BIMC/3%20TECH/1%20GENERAL%20\(B\)/2%20ANNUAL%20RPT/2024/](https://public.nwb-oen.ca/registry/2%20MINING%20MILLING/2A/2AM%20-%20Mining/2AM-MRY2540%20BIMC/3%20TECH/1%20GENERAL%20(B)/2%20ANNUAL%20RPT/2024/)

Summary of Review

Qikiqtani Inuit Association (QIA)

QIA provided forty-eight comments. As the comments are extensive, the NWB decided to include only the comments (in the table below) that are considered unresolved. As advised, the Licensee is referred to the original submission for detailed discussion on each comment and/or recommendation. For deadlines to respond and provide additional information in response to the comments and information requests, please refer to the table below.

Table 1. QIA's Comments on the 2024 Annual Report

No.	QIA's Comments / Recommendations	Deadline to Respond and Provide Additional Information
1	<i>General & Geotechnical</i> – Quality Assurance and Quality Control (QA/QC) 1) Provide a basis for considering 6.8% and 14.3% of results exceeding the Lowest Detection Limit (LDL) as negligible contamination and it is acceptable; 2) Provide a reference of guideline that supports these thresholds; and 3) Confirm that corrective actions implemented for the QA/QC program are also being applied consistently across all aspects of the field sampling program.	March 31, 2026 (2025 Annual Report)
2	<i>General & Geotechnical</i> – Baffinland to clarify: 1) How the 1,000-year return period this rainfall event was estimated? 2) The level of uncertainty associated with this estimate; and 3) How the potential for climate change to cause such events on a greater frequency is being factored into stream crossing remediation and design, and erosion and sediment control preparedness?	March 31, 2026 (2025 Annual Report)
3	<i>Aquatic Environment</i> – QIA requests the absence of spring sampling results be explained.	March 31, 2026 (2025 Annual Report)
4	<i>Aquatic Environment</i> – QIA recommends: 1) The additional sampling conducted during the 2024 special investigation of nitrogen-related compounds in Sheardown Lake tributary 9 (SLDT9) be continued in 2025, along with any other new stations needed to assess the efficacy of measures taken to reduce fugitive nitrogen compounds; and 2) That Baffinland consider the value of monitoring airborne dispersal of nitrogen compounds in the vicinity of the Dyno facility and mine pit.	March 31, 2026 (2025 Annual Report)

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)

CIRNAC provided twenty-seven comments. As the comments are extensive, the NWB decided to include only the comments (in the table below) that are considered unresolved or not adequately addressed. As advised above, the Licensee is referred to the original submission for detailed discussion on each comment and/or recommendation. For deadlines to respond and provide additional information in response to the comments and information requests, please refer to the table below.

Table 2. CIRNAC’s Comments on the 2024 Annual Report

No.	CIRNAC’s Comments / Recommendations	Deadline to Respond and Provide Additional Information
<i>Comments – Not adequately addressed</i>		
1	<i>Review of Previous CIRNAC Annual Report Recommendations (2021 to 2023) – (R-01)</i> CIRNAC recommends Baffinland address all outstanding “Not Addressed” or “In Progress” recommendations by October 15, 2025 (i.e. 90 days from this review). Failure to do so will result in non-addressed recommendations being forwarded to field operations to be further assessed during compliance audit(s).	March 31, 2026 (2025 Annual Report)
2	<i>Risk Based Screening Criteria for Groundwater Monitoring – (R-26)</i> Past Recommendations from CIRNAC are re-iterated below: a) Provide additional rationale as to how facilities are scored and how the levels of classification are chosen. If based on the ranking criteria used in Knight Piesold (2024b) the landfill facility and hazardous waste berm facility are considered medium risk, then groundwater monitoring should be implemented at all medium risk facilities. Furthermore, risk ranking methodologies between Milne Port and the Mine Site differ. Provide rationale for this discrepancy. Based on the proximity of the Ore Stockpile to the freshwater river to the west and marine environment to the north, groundwater monitoring and an expanded surface water monitoring network is recommended. b) Provide additional rationale on why the risk ranking has not been reevaluated following the identification of various changing conditions including increasing trends related to mine impacts, potentially leaking waste rock facility collection pond liner, increasing trends due to the emulsion plant, etc. c) Provide additional detail regarding the 2021 test pit program, including test pit locations, test pit logs and	March 31, 2026 (2025 Annual Report)

	rationale on why two test pits are deemed to be sufficient for assessing the presence of groundwater in an area over 50 hectares. Rationale should also be provided for why the use of a drill rig for monitoring well installation within the WRF was not followed. CIRNAC recommends Baffinland address these outstanding recommendations by October 15, 2025 (i.e. 90 days from this review).	
3	<i>Waste Rock Management (WRF)</i> – (R-27) CIRNAC recommends: a) Baffinland provide additional supporting information for Baffinland’s conclusion that 17% of seepage samples from the Waste Rock Facility (WRF) being acidic is not an issue for concern. b) Baffinland provide an examination of trends for metals and metalloids of environmental concern for the WRF, including figures. Several of these metals and metalloids reported total concentrations greater than the detection limit and are possibly associated with neutral mine drainage from the WRF. These include dissolved aluminium, iron, manganese, cadmium, chromium, copper, lead, mercury, nickel, selenium, and zinc. c) Baffinland complete an investigation of total dissolved solids concentrations above 1000 mg/L at the WRF which in the absence of explained alternate source of salinity suggests the waste rock may be a significant point source of salinity and potential adverse effects on revegetation of the final landform at closure. It is also recommended that Baffinland provide mitigation measures the source of salinity. CIRNAC recommends Baffinland address these outstanding recommendations by October 15, 2025 (i.e. 90 days from this review).	March 31, 2026 (2025 Annual Report)
<i>Comments – Unresolved pending further updates</i>		
	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	March 31, 2026 (2025 Annual Report)

CIRNAC stated in their submission of October 24, 2025, that they expect the 2025 Annual Report to 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.

Environment and Climate Change Canada (ECCC)

ECCC provided five comments. Baffinland in response to Interveners comments on October 2, 2025, addressed ECCC's comments and recommendations by providing additional information. ECCC in reply to Baffinland's response to comments provided additional recommendation on unresolved comment regarding Total Suspended Solids (TSS) freshet exceedances at camp lake settling ponds outfall. For deadline to respond and provide additional information in response to the additional recommendation, please refer to the table below.

Table 3. ECCC's Comments on the 2024 Annual Report

No.	ECCC's Comments / Recommendations	Deadline to Respond by and Provide Additional Information
Environment and Climate Change Canada (ECCC)		
1	<i>TSS Freshet Exceedances at Camp Lake Settling Ponds Outfall</i> –Comment #1: Consider whether increasing the Camp Lake Settling Pond's retention time is feasible and could be beneficial, and whether the current sampling location yields the most accurate measurements of TSS in water discharged from the pond.	March 31, 2026 (2025 Annual Report)

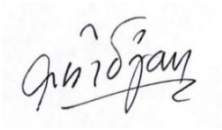
Fisheries and Oceans Canada (DFO)

DFO provided three comments. Baffinland in response to Interveners comments on October 2, 2025, addressed DFO's comments and recommendations by providing additional information. DFO advised that they have no concerns with Baffinland's responses to their comments.

The NWB would like to remind parties to keep comments and recommendations limited to the requirements of Annual Reports listed under Schedule B of the Water Licence. The Board also highlights that there are other avenues (i.e. NIRB, Commercial Lease Agreement etc.) that can be used for information requests related to matters not covered under the NWB Annual Report requirements. Additionally, the NWB echo's concern highlighted by CIRNAC that a number of recommendations have been deferred to the 2025 Annual Report. For the next Annual Reporting cycles, the Board asks Baffinland to make their best effort to address as many comments as possible by providing required information and details within their response to comments on Parties initial submissions on Annual Report. This is with the understanding that there may be some comments that require additional time to address and hence can be deferred to the proceeding Annual Report submission.

Should you have any questions, please feel free to contact the undersigned at (867) 360-6338 (extension 29) or at abid.jan@nwb-oen.ca.

Sincerely,

A handwritten signature in black ink, appearing to read 'Abid Jan', is positioned above a horizontal line.

Abid Jan
Technical Advisor
Nunavut Water Board

Enclosure: Comments – QIA, CIRNAC, ECCC, DFO

Cc: Distribution List – Mary River