

APPENDIX -

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Water Licence Inspection Report

Original
 Follow-Up Report

Authorization	Representative
Baffinland Iron Mines	William Bowden/Scott Klingmann
Authorization No. / Expiry	Representative's Title
2AM-MRY1325 June 10, 2025	Sr. Environnemental Superintendent/Mine Manager
Inspection Date: January 8, 2025	Inspector: Omer Pasalic
Activities Inspected	
<input type="checkbox"/> Camp, Commercial <input type="checkbox"/> Drilling <input type="checkbox"/> Mining <input type="checkbox"/> Construction <input type="checkbox"/> Reclamation <input type="checkbox"/> Fuel Storage <input type="checkbox"/> Roads/Hauling <input type="checkbox"/> Winter Hauling <input type="checkbox"/> Camp, Private <input checked="" type="checkbox"/> Other Waste Rock Facility/Follow up on the items of concern identified during October 23, 2024 inspection	

Section 1 Comments
<p>On Wednesday January 8, 2025 Inspector Omer Pasalic of the Crown Indigenous Relations and Northern Affairs Canada, conducted an inspection of the Mary River’s Waste Rock Facility (WRF) site to ensure commitment to the previously set quarterly targets of waste rock coverage. The work on the WRF was and is conducted by the permittee itself. In addition to the Waste Rock Facility inspection, the inspector followed up on the cleanup efforts on the damaged and loose culverts alongside Tote Road, namely KM 63.5 location. It is noted these culverts were damaged and misplaced due to the fall 2024 rain event. The plan for the cleanup of the culverts was shared by the Baffinland’s Environmental staff to the inspector during the October 23rd, 2024 site inspection. At the time, the inspector agreed the discussed plan was both reasonable and satisfactory.</p> <p>During the January 8, 2025 inspection, the inspector was accompanied by William Bowden, Senior Environmental Superintendent, and Scott Klingmann, Mine Manager.</p> <p>Inspector was advised there are currently 374 staff members at the Mary River site and an additional 180 staff members at the Milne Inlet Port site. The consumption of water and disposal of waste for both sites are within the prescribed perimeters, as per the Water License volume requirements.</p> <p>At approximately 0950 hours, WRF was visited. Inspector noted the site to be clean and well organized. Taking of photographs were extremely difficult and low in quality due to the limited visibility and the extremely cold temperatures. Baffinland was able to provide an aerial photo of the facility taken January 6, 2025 by a drone.</p> <p>Scott Klingmann advised the rock cover is at 85 percent - meaning that the target of the overall coverage was met. The inspector was advised Q4 report is currently being worked on and will undergo the internal review before it gets submitted to the regulators. Target date for the Q4 report to be finalized and sent out is within the last week of January 2025.</p> <p>Once the Waste Rock Facility was cleared, the inspector followed up on the up to date culvert removal efforts, as identified in the October 23, 2024 inspection.</p> <p>William Bowden informed the inspector the damaged and loose culverts have been completely removed from the site between November 28th and November 29th, 2024.</p> <p>Pictures of the removal of the culverts are included in this report.</p>
Section 2 Non-Compliance with Acts or License
- None at this time
Section 3 Action Required
- Provide Q4 WRF report



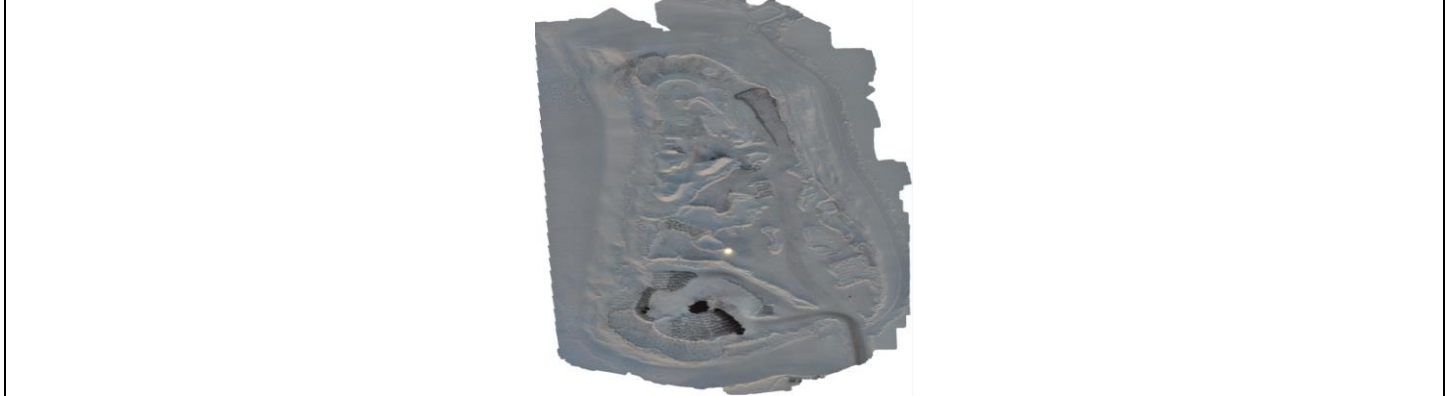
Licensee or Representative	Inspector's Name
William Bowden	Omer Pasalic
Signature	Signature
<i>William Bowden</i>	<i>Omer Pasalic</i>
Date	Date
January 17 2025	January 15, 2025

Office Use Follow-up report to be issued by Inspector Yes No

PHOTO LOG

Date:	Authorization Number:	Camera/Model:	Inspector
Monday, January 6, 2025	2AM-MRY1325	Ortho-Drone/Huawei P30 Pro	Pasalic

Photo No. 1	Lat/Long (DD.MM.SS.SS, NAD83)
Waste Rock Facility	MRY-WRF



Description:
Aerial photograph of the Waste Rock Facility

Photo No. 2	Lat/Long (DD.MM.SS.SS, NAD83)
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MRY-WRF



Description:

Photo from the inside of the facility

Photo No. 3

Lat/Long (DD.MM.SS.SS, NAD83)

MRY-WRF



Description:

Photo from the inside of the facility

Photo No. 4



Photo 4. KM 63.5, Culverts retrieved from watercourse, staged next to Tote Road for pick final disposal, 2024-11-28

Description:

Culverts staging area before removal

Photo No. 5

[Click or tap here to enter text.](#)



Photo 5. KM 63.5, Culverts retrieved from watercourse, staged next to Tote Road for pick-up and final disposal, 2024-11-28

Description:

Culverts staging area before removal

Photo No. 6

[Click or tap here to enter text.](#)



Photo 7. KM 63.5, Culvert staging area empty, after transporting culvert debris for disposal, 2024-11-29

Description:

Culverts removed. Staging area clear.

To: Andrew Keim, Lauren Perrin, CIRNAC QIA, NWB
From: Baffinland Iron Mines Corporation
Date: January 31, 2024
Subject: 2024 Q4 Waste Rock Management Compliance

This memo summarizes the results of 2024 progressive reclamation in alignment with the Waste Rock Facility (WRF) QAQC Monitoring Plan, included as part of the Phase I Waste Rock Management Plan (WRMP) issued April 2nd, 2024.

Summary

The placement of waste rock during 2024 Q4 was consistent with the most recent WRMP commitment to cover exposed Potentially Acid Generating (PAG) waste with a 4 m thick layer of non-Acid Generating (non-AG) waste. The portion of the WRF overlain by non-AG waste increased from 50 % at the end of Q3 to 92 % in Q4. The QAQC program did not reveal any inconsistencies with material classification for cover placement and the TARP performance indicators did not require any corrective actions in Q4. In 2025, Baffinland will maintain no more than 15 % of exposed PAG at all times.

Q4 WRF Coverage Progress

The portion of the WRF overlain by non-AG waste increased from 50 % at the end of Q3 to 92 % (total area 357,322 m²) in Q4. This 42 % increase includes 16 % (63,610 m²) area covered with 4 m of Non-AG waste placed in Q4 and 26 % (99,595 m²) area confirmed to already have 4 m of non-AG waste as part of a comprehensive drilling and sampling program completed in Q4. Details of waste placement and the drilling and sampling program are discussed below. A drawing of the WRF surface highlighting Non-AG and PAG areas is included in Appendix A.

4 m Non-AG Waste Placement

Mine Operations placed 626,672 tonnes of non-AG material in Q4. The portion of the WRF covered by 4 m of non-AG increased by 16 % (63,610 m²).

Dump compliance was fully adhered to with 100 % of PAG loads placed within delineated PAG cell. Records supporting in-pit material identification and WRF placement can be found in Appendix B.

The QAQC sampling was completed on January 20, 2025 and consisted of drilling 10 holes into the 4 m Non-AG cover lift placed during Q4. The drill hole locations are shown on the drawing provided in Appendix A. Holes were drilled to a depth of 2 m and samples collected from 0.5 to 2.0 m depth. Samples were tested on-site for total sulphur and paste pH before being shipped off-site for Modified Sobek testing. Assay results from the on-site laboratory are presented in Appendix C, as well as the results for Q3 Modified Sobek. Due to longer turnaround time, results for Q4 Modified Sobek testing will be shared at a later date.

Results from on-site testing indicate material within the 4 m cover lift is classified as Non-AG using the waste rock classification criteria presented in Section 6 of the Phase 1 Waste Rock Management Plan.

WRF Drilling and Sampling Campaign

Baffinland engaged WSP Canada Inc. (WSP) to develop a comprehensive drilling and sampling program to validate the classification of existing material in the top 4 m of selected zones of the WRF surface as PAG or Non-AG. The purpose of the program was to evaluate selected zones to determine if there was a 4 m cover of Non-AG and these zones are therefore already covered. The method, analysis and results of the drilling and sampling campaign developed by WSP is detailed in the Waste Rock Facility Drilling and Sampling Campaign, Cover Requirement Evaluation report (WSP, 2025).

This investigation increased the area covered by 4 m of Non-AG waste by 26 % (99,595 m²) in Q4.

2025 WRF Action Plan

The performance indicators outlined in the quarterly monitoring plan for Q4 were fully compliant, demonstrating a strong alignment with established standards. The comprehensive quarterly Trigger Action Response Plan (TARP) audit, detailed in Appendix E, confirms that all processes were executed effectively.

Corrective actions from 2024 will remain in place and be actively monitored, with continued follow-up to ensure adherence to the waste dump deposition plan. All PAG waste will be properly placed within the designated PAG cell, maintaining no more than 15 % of exposed PAG at all times. At this time, no additional corrective actions are required.

In 2025, Baffinland will maintain a maximum of 15 % of exposed PAG at all times. As the progressive reclamation of the waste rock facility was completed in 2024, Baffinland plans to update the quarterly reporting requirements outlined in the QAQC WRF Monitoring Program to move towards annual reporting. Baffinland plans to continue reporting on waste rock placement as part of its annual reports. Baffinland will submit proposed revisions to the management plan as part of the NWB-QIA Annual Reports for Operations.

References

- Baffinland Iron Mines Corporation, 2024. Phase I Waste Rock Management Plan. BAF-PH1-830-P16-0029, Rev 4.1. Issued April 2, 2024, 378 pages.
- Baffinland Iron Mines Corporation, 2024. Waste Rock Facility QAQC Monitoring Plan. BAF-PH1-340-P16-0004, Rev 2. Issued March 25, 2024, 29 pages.
- WSP, 2025. Waste Rock Facility Drilling and Sampling Campaign, Cover Requirement Evaluation. CA0044106.3476-003-TM-Rev0. Issued January 30, 2025, 15 pages.

Appendices

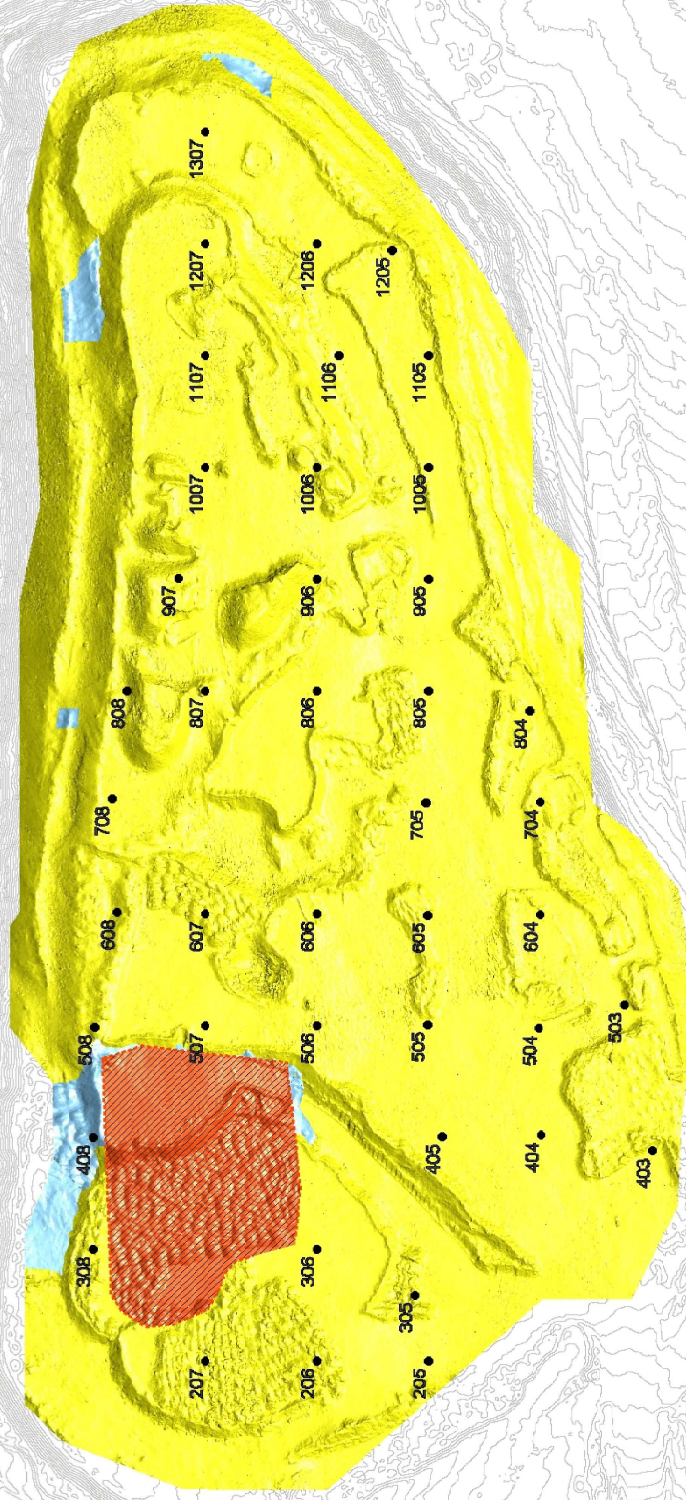
- Appendix A: WRF 4 m Cover Progress Drawing
- Appendix B: In-pit Material Identification
- Appendix C: WRF Non-AG Cover Placement Verification Testing Results
- Appendix D: Quarterly TARP Audit

Appendix A: WRF 4 m Cover Progress Drawing

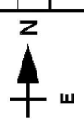
2024 WRF Cover Progress

	Q1	Q2	Q3	Q4
Final 4m Cover m2	388,233			
Actual 4m Cover m2	59,584	141,647	194,509	357,321
Actual % Covered	15%	36%	50%	92%
Quarterly Cover % Target	15%	34%	50%	85%

Note : Actual % Covered includes drilled areas sampled as MAG

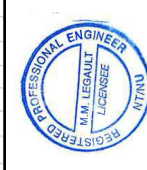


NOTES: SURVEYED JANUARY 6, 2025



LEGEND

 NON-AG 4m COVER
 UNCOVERED
 UNCOVERED PAG
 COVER DRILLING



PRINT: Miles Legault, P.Eng



WRF 4m COVER - PROGRESS REPORT

January 6th, 2025

PROJECT:

DATE:



Appendix B: In-Pit Material Identification

In-pit Material Identification			
Dig Block ID	Material	Tonnes	Sulphur %
N1_440_001_800	Non-AG	23532	0.06
N1_440_001_810	Non-AG	18444	0.04
N1_440_001_900	AG	36252	0.68
N1_440_003_810	Non-AG	212	0.03
N1_440_003_900	AG	6360	0.23
N1_440_004_900	Non-AG	1272	0.25
N1_440_005_800	Non-AG	212	0.04
N1_440_007_810	Non-AG	37312	0.13
N1_450_004_900	AG	5300	0.21
N1_450_011_810	Non-AG	6784	0.11
N1_450_011_900	AG	6148	0.24
N1_450_013_810	Non-AG	424	0.07
N1_450_015_800	Non-AG	95188	0.05
N1_450_019_810	Non-AG	42188	0.04
N1_450_019_900	AG	45792	0.20
N1_460_018_810	Non-AG	2756	0.16
N1_460_018_900	AG	636	0.16
N1_460_031_810	Non-AG	13144	0.02
N1_460_033_810	Non-AG	90524	0.02
N1_460_033_811	Non-AG	10812	0.04
N1_460_033_900	AG	212	0.43
N2_640_113_800	Non-AG	32860	0.05
N2_640_113_900	AG	55968	0.57
N2_640_115_800	Non-AG	93280	0.02
N2_650_113_800	Non-AG	86920	0.01

Appendix C: WRF Non-AG Cover Placement Verification Testing Results

Q4 QAQC Sampling Results with Modified Sobek

Hole ID	ALS ID	Recvd Wt. kg	Dry Wt. kg	Moisture %	S %	Paste pH Unity	FIZZ RATING Unity	NP tCaCO ₃ /1kt	MPA tCaCO ₃ /1kt	NNP tCaCO ₃ /1kt	Ratio (NP:MPA)
604	G955064	2,71	2,4	11,45	0,011	8,2	1	7	0,3	7	22,4
405	G955065	6,06	5,74	5,28	0,036	8,6	1	8	0,9	7	8,53
605	G955066	3,3	2,91	11,8	0,034	8,8	1	8	1,3	7	6,4
503	G955067	5,2	4,91	5,58	0,03	8,2	1	8	0,9	7	8,53
1307	G955068	5,04	4,81	4,56	0,01	8,3	1	9	0,3	9	28,8
404	G955069	7,63	7,25	4,98	0,023	8,9	1	11	0,6	10	17,6
504	G955070	6,84	6,38	6,73	0,047	8,3	1	12	1,3	11	9,6
705	G955071	5,37	4,52	15,85	0,016	9	1	8	0,6	7	12,8
403	G955072	5,35	4,9	8,41	0,026	8,4	1	20	0,9	19	21,33
505	G955073	4,48	4,24	5,36	0,02	8,7	1	10	0,6	9	16
804	G955074	4,92	3,82	22,4	0,09	8,8	1	8	2,8	5	2,84
305	G955075	4,4	3,6	18,2	0,119	8,5	1	9	3,8	5	2,4
1105	G955076	5,15	4,6	10,7	0,015	8,3	2	46	0,3	46	147,2

Q4 QAQC Sampling Results

Hole ID	ALS ID	Recvd Wt. kg	Dry Wt. kg	Moisture %	S %	Paste pH Unity
306	M506028	12.41	11.87	4.35	0.17	8.1
806	M506029	8.78	8.1	7.74	0.024	8.6
704	M506030	6.74	6.22	7.72	0.045	8.9
607	M506031	8.93	7.54	15.55	0.026	8.2
506	M506032	10.67	9.98	6.47	0.033	8.2
206	M506033	10.19	9.85	3.34	0.022	8.7
308	M506034	9.5	8.99	5.37	0.06	8.4
207	M506035	7.83	7.67	2.04	0.056	8.9
606	M506036	8.86	8.5	4.06	0.024	8.9
507	M506037	9.25	8.94	3.35	0.019	8.8

Appendix D: Quarterly TARP Audit

Weekly Waste Deposition Audit						01-Oct	31-Dec
Project Activity	Objectives	Performance Indicators	Monitoring Program	Status	Response		
Material Classification	Ensuring accurate material categorization	Chemical characteristics and categorization of dig blocks	Quarterly Audit of Dig Blocks	Not Required	No action required.		
Material Classification	Ensuring accurate material categorization	Chemical characteristics and categorization of dig blocks	Quarterly Total Sulfur vs ABA confirmation testwork, and SFE analysis	Not Required	No action required.		
Execution Control	Adherence to WRMP	Dump Compliance	Quarterly Reporting and Planning	100% of loads within allowed PAG dumping locations	No action required.		
Execution Control	Adherence to WRMP	Lift Thickness. Cover thickness.	Quarterly Reporting and Planning	Lift thickness, Cover thickness 100% compliant	No action required		



Water Licence Inspection Report

Original
 Follow-Up Report

Authorization	Representative
Baffinland Iron Mines	Katie Babin
Authorization No. / Expiry	Representative's Title
2AM-MRY2540	Environmental Superintendent
Activities Inspected	
<input checked="" type="checkbox"/> Camp, Commercial <input checked="" type="checkbox"/> Drilling <input checked="" type="checkbox"/> Mining <input type="checkbox"/> Construction <input type="checkbox"/> Reclamation <input checked="" type="checkbox"/> Fuel Storage <input checked="" type="checkbox"/> Roads/Hauling <input type="checkbox"/> Winter Hauling <input type="checkbox"/> Camp, Private <input type="checkbox"/> Other	

Section 1 Comments

On June 26, 2025 I, Sean Naullaq, along with Omer Pasalic, Inspectors with the Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) completed an inspection of the site named above for the purpose of verifying terms and conditions in which the water license was issued upon. The inspectors were accompanied by Katie Babin, Environmental Superintendent for Baffinland Iron Mines. Inspectors Naullaq and Pasalic had conducted inspections on multiple sites including Mary River, Tote Road, Milne Inlet and Steensby Inlet.

The sites inspected are listed as follows:

Mary River

- Waste Rock Facility and Waste Water Treatment Facility
- KM106 Ore Stockpile
- KM105 Dam
- Water Intake Supply/Jetty
- Landfill
- Incinerator
- Hazardous Waste Management Cells/Ponds
- Tank Farm

Tote Road

- General condition of Tote Road
- Road washout areas
- Milne Port Site Water Supply

Milne Port Site

- Ship Loader
- Landfarm
- Tank Farm
- Ore Stockpile

Steensby Inlet

- Structures in camp

The following NT-NU Spills were also closed during the inspection:

- 2025-502
- 2025-264
- 2025-248
- 2025-227
- 2024-398

Section 2 Non-Compliance with Acts or License

1. Numerous quatrex bags filled with previously contaminated soil were discovered outside a designated lined/berm facility.



- 2. A pallet of drums containing oil or fuel were observed outside the repair shop near the crusher pad and were not contained within secondary containment.
- 3. A fuel spill was observed near the Heavy Duty truck laydown yard at the Milne Port site.

Section 3 Action Required

- 1. Hazardous Waste must be placed into a designated lined facility.
- 2. Drums of hazardous materials must be placed within secondary containment.
- 3. All fuel spills must be reported and remediated to the satisfaction of the Inspector.

Licensee or Representative Todd Swenson	Inspector's Name Sean Naullaq
Signature 	Signature
Date September 8, 2025	Date August 18, 2025

Office Use Only: Follow-up report to be issued by Inspector Yes No



PHOTO LOG

Date:	Authorization Number:	Camera/Model:	Inspector
Monday, June 26, 2028	2AM-MRY1325	Samsung S23	Sean Naullaq

Photo No. 1
Photo

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Description:
View of water runoff from the Waste Rock Facility flowing down to the Surface Water Management Pond. Photo was taken on the East side.

Photo No. 2
Photo



Description:
Another view of the water runoff coming from upstream.



Photo No. 3

Photo

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Description:

View of Waste Rock Facility's Surface Water Management Pond. Once the surface water reaches here it is treated prior to being discharged.

Photo No. 4

Photo

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Description:

View of surface water runoff entering the management pond from the West side.



Photo No. 5

Photo

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Description:

Photo of the Waste Rock Facility facing North.

Photo No. 6

Photo

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Description:

Photo of the KM106 Ore Stockpile.



Photo No. 7

Photo

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Description:

Another view of the ore stockpile.

Photo No. 8

Photo

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Description:

A breach in the drainage system during freshet had caused untreated water to escape the facility. The spill has then been managed and spill file has been closed.



Photo No. 9

Photo

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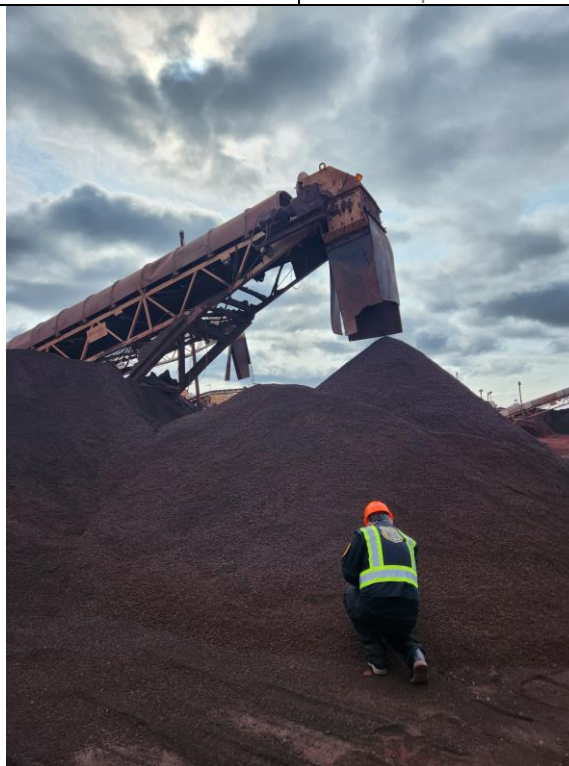
Description:

Photo showing the Surface Water Management Pond that collects water from the KM106 Ore Stockpile.

Photo No. 10

Photo

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Description:

Photo of the fine ore that is crushed prior to being hauled to Milne Inlet.



Photo No. 11

Photo

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Description:

Surface Water Management Pond for the Crusher Pad.

Photo No. 12

Photo

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Description:

Photo showing water entering the KM105 Dam. A series of ditches carry the water from the mine/deposit and into the dam structures to treat water prior to exiting into the environment.



Photo No. 13

Photo

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Description:

Check dams have been put in place in order to further treat/settle the sediments before reaching the dam.

Photo No. 14

Photo

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Description:

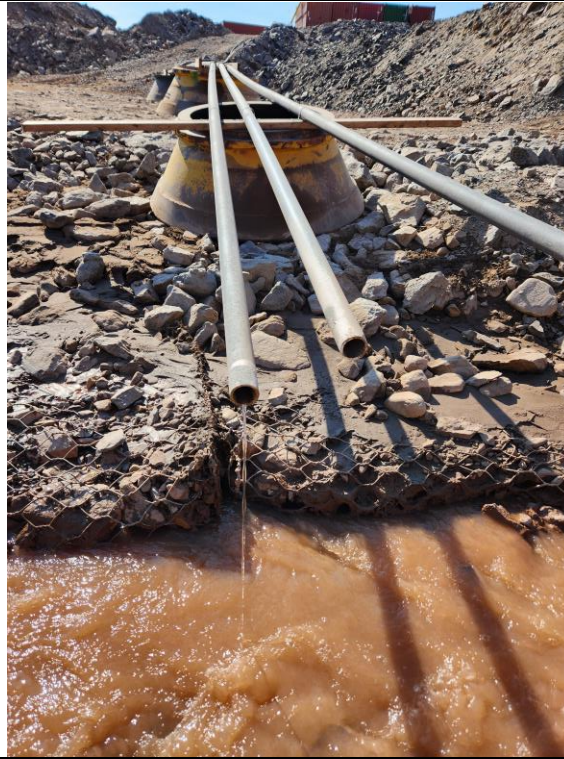
A solution is being deposited into the drainage system to help with the dispersion of sediment into the stream.



Photo No. 15

Photo

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Description:

A solution is being deposited into the drainage system to help with the dispersion of sediment into the stream.

Photo No. 16

Photo

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Description:

Another check dam to help with the sedimentation levels prior to reaching the dam.



Photo No. 17

Photo

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Description:

Photo showing water quality after the initial treatment of the check dams.

Photo No. 18

Photo

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Description:

KM105 dam facing West.



Photo No. 19

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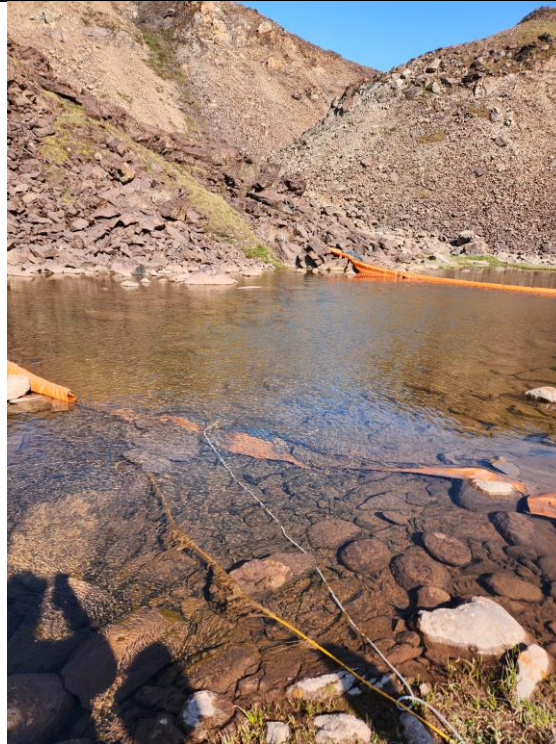
Description:

Water quality improving significantly after the dam.

Photo No. 20

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Description:

Final water monitoring station of the KM105 facility before it is discharged into the environment. The water was clear and no signs of elevated TSS was observed.



Photo No. 21

Photo

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Description:

Photo of treated water being released back into the environment after treatment.

Photo No. 22

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Description:

Photo of Water Intake Station at Camp Lake. Water is withdrawn from here to supply water for the Mary River Mine Site.



Photo No. 23

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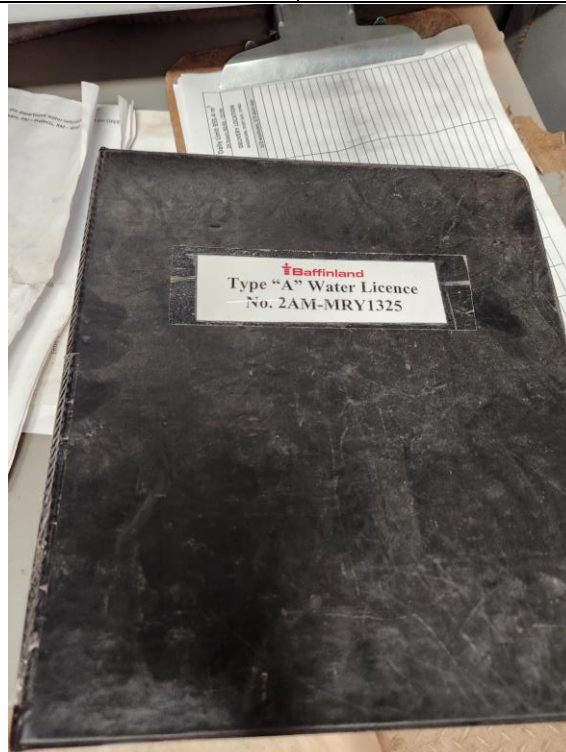
Description:

Photo of flow meter at the Jetty,

Photo No. 24

Photo

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Description:

A copy of the Water License was observed within the pump station. This will need to be replaced with the new version of the Water License.



Photo No. 25

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Description:

Proper signage was observed at the Mary River Landfill.

Photo No. 26

Photo

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Description:

Photo of the landfill facing South.



Photo No. 27

Photo

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Description:

Photo of landfill facing West.

Photo No. 28

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Description:

Photo of miscellaneous contents within the landfill.

Photo No. 29

Photo

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Description:

Some bulk material outside of the landfill will be sent out via sealift to be sent south for disposal.

Photo No. 30

Photo

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Description:

View of the North corner of the landfill.



Photo No. 31

Photo

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Description:

Photo of the Hazardous Waste Disposal Facility. Baffinland team stated work will begin to treat/discharge the water contained within the berm.

Photo No. 32

Photo

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Description:

Hazardous Waste was observed outside a lined berm. CIRNAC inspectors had instructed the Baffinland team to have these moved to a lined berm.



Photo No. 33

Photo

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Description:

Photo of Mary River tank farm and refuelling station. No sheening was observed within the berm.

Photo No. 34

Photo

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Description:

Another view of the Mary River tank farm.



Photo No. 35

Photo

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Description:

This section of the tote road had a washout during the 2024 severe rain event. Culverts were replaced and the road was repaired.

Photo No. 36

Photo

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Description:

Photo showing the direction that the water had come through during the severe rain event.



Photo No. 37

Photo

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Description:

View of the Raw Water Intake location for the Milne Inlet site. Water is withdrawn from this lake and trucked to Milne Inlet.

Photo No. 38

Photo

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Description:

View of the Raw Water Intake location for the Milne Inlet site. Water is withdrawn from this lake and trucked to Milne Inlet.



Photo No. 39

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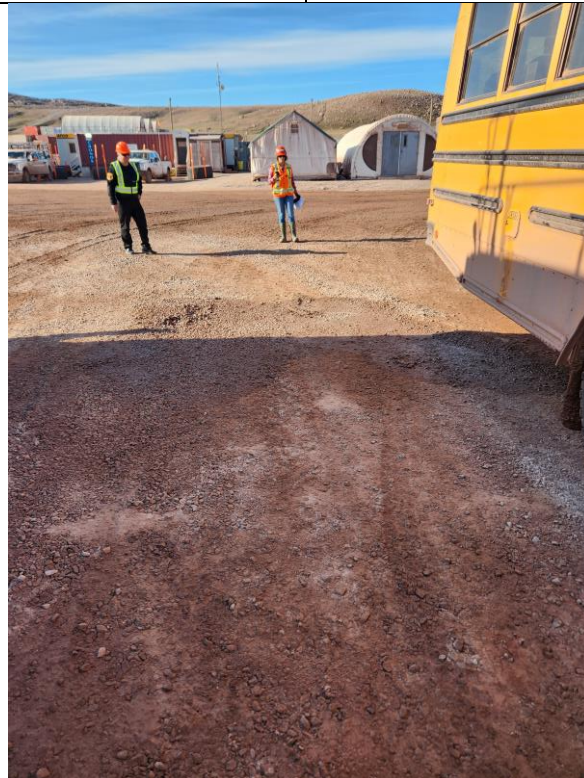
Description:

A fuel spill had been observed at the Milne Port Site. The Baffinland team had started the remediation shortly after the inspection.

Photo No. 40

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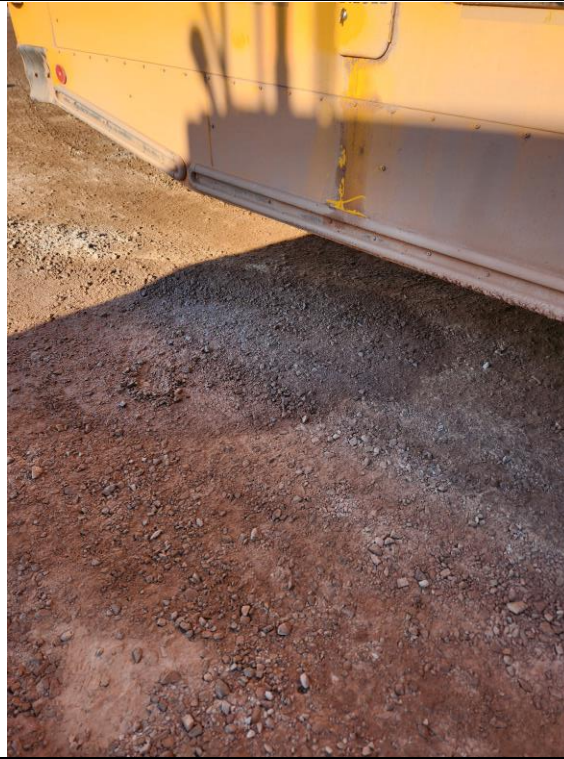
A fuel spill had been observed at the Milne Port Site. The Baffinland team had started the remediation shortly after the inspection.



Photo No. 41

Photo

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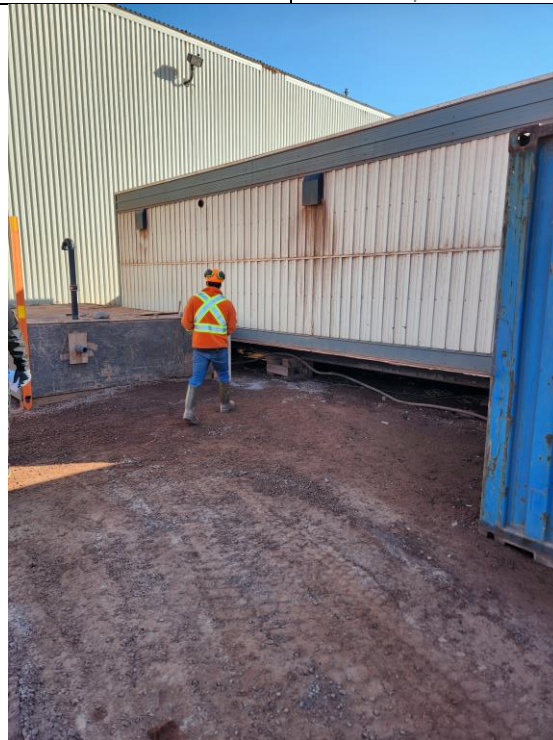
Description:

A fuel spill had been observed at the Milne Port Site. The Baffinland team had started the remediation shortly after the inspection.

Photo No. 42

Photo

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Description:

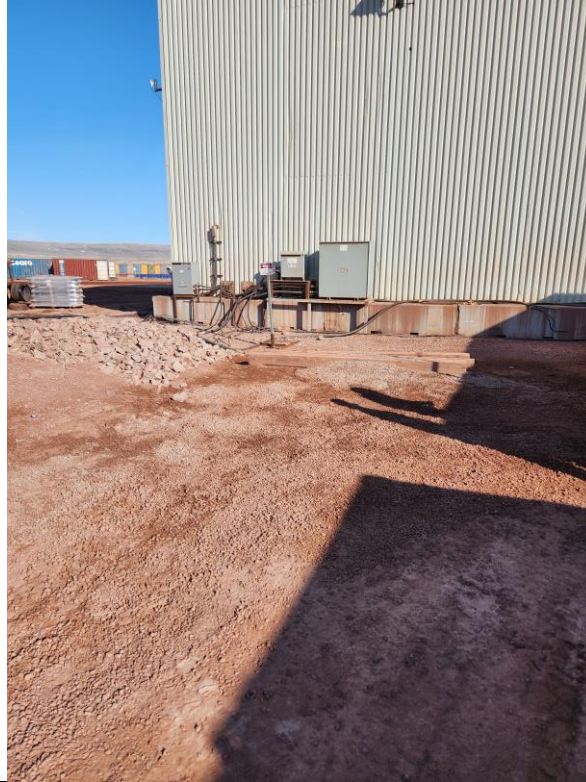
During the inspection, a follow-up had occurred on one of the sewage spills that occurred during the winter. Remediation had been conducted.



Photo No. 43

Photo

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Description:

During the inspection, a follow-up had occurred on one of the sewage spills that occurred during the winter. Remediation had been conducted.

Photo No. 44

Photo

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Description:

View of the polishing pond at the Milne Port Site. Sewage/grey water is pumped into this lined berm prior to treatment.



Photo No. 45

Photo

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Description:

An inspection of the tank farm at the Milne Port Site was completed and no issues were observed at the time of the inspection.

Photo No. 46

Photo

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Description:

View of the Hazardous Waste Storage Facility at the Milne Port Site. Most of this hazardous waste was to be sent down south during the sealift season.



Photo No. 47

Photo

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Description:

View of the Hazardous Waste Storage Facility at the Milne Port Site. Most of this hazardous waste was to be sent down south during the sealift season.

Photo No. 48

Photo

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Description:

View of the Hazardous Waste Settlement Pond. Contaminated snow and water are sent here prior to being treated and discharged.



Photo No. 49

Photo

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Description:

Photo of the ore stockpile at the Milne Inlet site.

Photo No. 50

Photo

Click or tap here to enter text.



Description:

Photo of the ore stockpile at the Milne Inlet site. The Shiploader is also included in the photo.



Photo No. 51

Photo

Click or tap here to enter text.



Description:

Aerial photo of the equipment and structures at the Steensby Inlet site.

Photo No. 52

Photo

Click or tap here to enter text.



Description:

Aerial photo of the equipment and structures at the Steensby Inlet site.



Photo No. 53

Photo

Click or tap here to enter text.



Description:

Numerous fuel drums were observed at the Steensby Inlet site. Baffinland stated that work will start to remove old equipment and structures.

Photo No. 54

Photo

Click or tap here to enter text.



Description:

Old tents and cabins were observed at the Steensby Inlet site. Baffinland stated that work will start to remove old equipment and structures.



Photo No. 55

Photo

Click or tap here to enter text.



Description:

Numerous fuel drums were observed at the Steensby Inlet site. Baffinland stated that work will start to remove old equipment and structures.

Photo No. 56

Photo

Click or tap here to enter text.



Description:

Numerous fuel drums were observed at the Steensby Inlet site. Baffinland stated that work will start to remove old equipment and structures.



Photo No. 57

Photo

Click or tap here to enter text.



Description:

Numerous fuel drums were observed at the Steensby Inlet site. Baffinland stated that work will start to remove old equipment and structures.

Photo No. 58

Photo

Click or tap here to enter text.



Description:

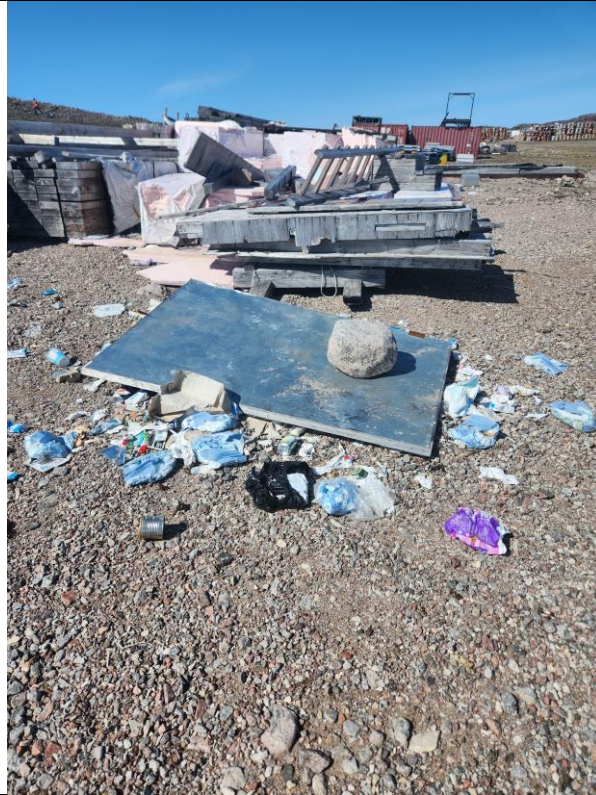
Sea-cans and miscellaneous equipment were observed at the Steensby Inlet site. Baffinland stated that work will start to remove old equipment and structures.



Photo No. 59

Photo

Click or tap here to enter text.



Description:

Hunters belongings were also observed at the Steensby Inlet site.

Photo No. 60

Photo

Click or tap here to enter text.



Description:

Aerial photo of the helicopter crash that has since been remediated.



Photo No. 61

Photo

Click or tap here to enter text.



Description:

No debris was observed at the helicopter crash site. Stakes were observed confirming the location of the site.

Photo No. 62

Photo

Click or tap here to enter text.



Description:

No debris was observed at the helicopter crash site. Stakes were observed confirming the location of the site.

October 3, 2025

Sean Naullaq
Resources Management Officer
Crown Indigenous Relations and Northern Affairs (CIRNAC)
Nunavut District, Nunavut Region
P.O. Box 100
Iqaluit, NU X0A 0H0

Re: Baffinland Response to June 2025 CIRNAC Inspection

The following submission from Baffinland Iron Mines Corporation (Baffinland) is a follow up in response to the Water Licence Inspection¹ conducted from June 25 to July 1, 2025, at Baffinland's Mary River Project (the Project), by Crown-Indigenous Relations Northern Affairs Canada (CIRNAC). The attached Table 1 provides a summary of follow up information and updates requested by CIRNAC in their Inspection Report issued August 18, 2025.

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

Regards,

A handwritten signature in black ink, appearing to read "Todd Swenson".

Todd Swenson

Environmental Superintendent

Cc: Karén Kharatyan, Nidhi Singh (NWB)
Jeremy Fraser, Omer Pasalic (CIRNAC)
Megan Lord-Hoyle, Lou Kamermans, William Bowden, Francois Gaudreau, Allison Parker, Irniq Lecompte (Baffinland)

Attachments

Attachment 1 – Table 1: Baffinland Responses to CIRNAC 2025 June Inspection Action Items

Attachment 2 – Photos

¹ CIRNAC (2025) CIRNAC Baffinland Water License Inspection Report – June 2025 - CIRNAC Baffinland Iron Mines Water Licence Inspection Form. Inspection form dated August 18, 2025.

Attachment 1**Baffinland Response to CIRNAC 2023 September Inspection Report**

Table 1: Baffinland Responses to CIRNAC 2025 June Inspection Report

Section	Description	Baffinland's Response
2/3	Numerous quatrex bags filled with previously contaminated soil were discovered outside a designated lined/berm facility. Hazardous Waste must be placed into a designated lined facility.	The quatrex bags were removed and the area cleared (See Photo 1).
2/3	A pallet of drums containing oil or fuel were observed outside the repair shop near the crusher pad and were not contained within secondary containment. Drums of hazardous materials must be placed within secondary containment.	The drums have been relocated from outside the building to a designated storage area, and remaining fuel drums have spill containment (see Photos 2 and 3).
2/3	A fuel spill was observed near the Heavy-Duty truck laydown yard at the Milne Port site. All fuel spills must be reported and remediated to the satisfaction of the Inspector.	An investigation was conducted to identify the source of the referenced apparent spill. Sampling was carried out to test for Total Oil and Grease (TOG) on wetted soils beneath the bus fuel port, and results indicate the staining observed was not hydrocarbons, but was rather water that was released from a water truck parked next to the bus photographed (see Photo 4), and the wetness on the ground was not from the bus fuel port. This is therefore not classified as a spill under our Spill Contingency Plan (SCP). If this were deemed to be a spill, Baffinland would have initiated the SCP and including investigation of volume for external reporting, and if reported, ensuring that the spill was remediated to the inspector's satisfaction.

Attachment 2**Photos**



Photo 1. Landfarm cleared of hazardous materials – August 3, 2025



Photo 2. Materials removed from in front of Crusher Shop – September 23, 2025



Photo 3. Drums placed within secondary containment – September 23, 2025



Photo 4: Water Truck parked directly adjacent to stained soils – June 27, 2025



Water Licence Inspection Report

Original
 Follow-Up Report

Authorization	Representative
Baffinland Iron Mines	Todd Swenson
Authorization No. / Expiry	Representative's Title
2AM-MRY2540	Environmental Superintendent
Activities Inspected	
<input checked="" type="checkbox"/> Camp, Commercial <input checked="" type="checkbox"/> Drilling <input checked="" type="checkbox"/> Mining <input type="checkbox"/> Construction <input type="checkbox"/> Reclamation <input checked="" type="checkbox"/> Fuel Storage <input checked="" type="checkbox"/> Roads/Hauling <input type="checkbox"/> Winter Hauling <input type="checkbox"/> Camp, Private <input type="checkbox"/> Other	

Section 1 Comments

On October 9, 2025 I, Sean Naullaq, along with Omer Pasalic, Inspectors with the Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) completed an inspection of the site named above for the purpose of verifying terms and conditions in which the water license was issued upon. The inspectors were accompanied by Todd Swenson, Environmental Superintendent for Baffinland Iron Mines. Inspectors Naullaq and Pasalic had conducted inspections at the Mary River Mine Site.

The sites inspected are listed as follows:
Mary River

- KM105 Dam
- Water Intake Supply/Jetty
- Landfill
- Hazardous Waste Management Cells/Ponds
- Tank Farm

During the inspection, hazardous waste was observed out of secondary containment due to snow build up. The issue was resolved the following day and the hazardous waste was placed within secondary containment. The inspection of the tote road was not done due to weather and road conditions during this time.

Road/culvert work was completed during the summer of 2025 at the Mary River site down grade from the tank farm. This was done to repair the road washout and prevent this incident from happening again. Photos of the job can be seen in the photo log below.

Section 2 Non-Compliance with Acts or License
1. Hazardous waste was observed outside of secondary containment and was placed into secondary containment the following day.
Section 3 Action Required
1. No action needed.

Licensee or Representative Todd Swenson	Inspector's Name Sean Naullaq
Signature 	Signature
Date January 14, 2026	Date January 14, 2026

Office Use Only: Follow-up report to be issued by Inspector Yes No



PHOTO LOG

Date:	Authorization Number:	Camera/Model:	Inspector
Thursday, October 9, 2025	2AM-MRY2540	Samsung S23	Sean Naullaq

Photo No. 1
Photo

Click or tap here to enter text.



Description: Photo of fuel refuelling station for light duty vehicles.
--

Photo No. 2
Photo



Description: Secondary containment devices at the refuelling station.



Photo No. 3

Photo

Click or tap here to enter text.



Description:

Photo showing snow and ice conditions within the tank farm.

Photo No. 4

Photo

Click or tap here to enter text.



Description:

Digital water use monitoring at the water intake station.



Photo No. 5

Photo

Click or tap here to enter text.

MINE SITE JETTY : Water Withdrawal Log						Daily Limit 355.4 m ³ 24 hours 00:00 - 23:59	
TP	DATE	TIME 0:00-0:24	TRUCK	DRIVER	METER START	METER END	DELIVERY LOCATION WASHCARS, DUST SUP., DINO
MPLE	22-Feb	22:00	27	JOE	0	4000	1/2 washcars, 1/2 dust sup
	22-Feb	12:51	004	Juan	15200046	152203806	SITC
	22-Feb	1:45pm	004	Robbie	15220308	15206714	SITC
	22-Feb	11:46	004	Juan	15206756	15209134	SITC
	22-Feb	12:10	004	Juan	15209134	15211914	SITC
	22-Feb	12:14	004	Juan	15211914	15215826	SITC
	22-Feb	01:40	004	Juan	15215826	15216017	SITC
	22-Feb	01:45	004	Juan	15216017	15220380	DINO
	22-Feb	12:55pm	004	Juan	15220380	15227736	salakik plant
	22-Feb	01:05pm	004	Juan	15227736	15306090	SITC
	22-Feb	01:07pm	004	Juan	15306090	15307658	SITC
	22-Feb	01:26	004	Juan	15307658	15309054	SITC
	22-Feb	01:30pm	004	Daniel	15307780	15309054	SITC

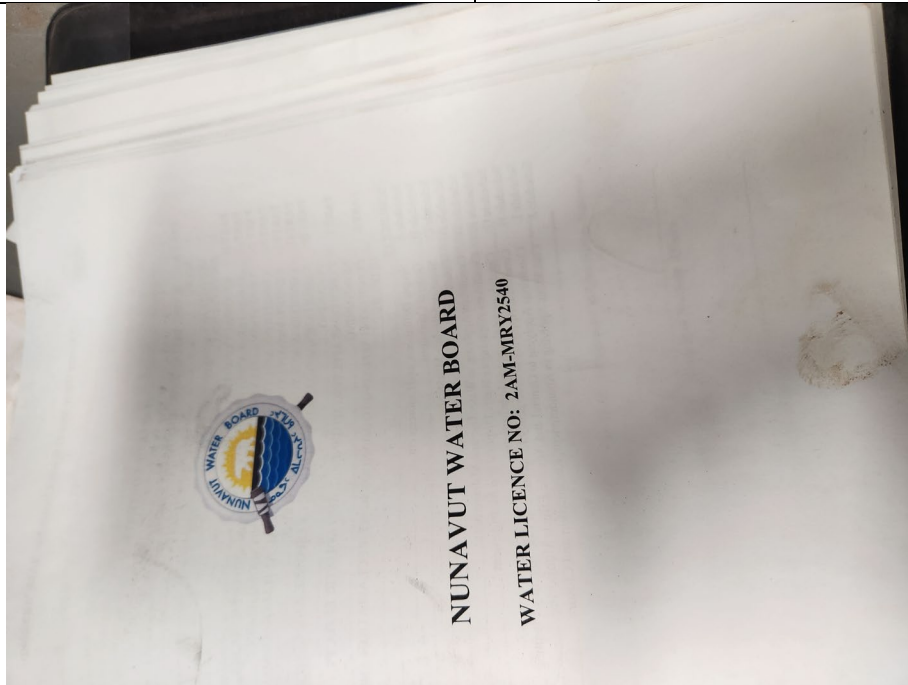
Description:

Paper logs are also recorded within the water intake station.

Photo No. 6

Photo

Click or tap here to enter text.



Description:

Photo of the updated water license located inside the water intake station.



Photo No. 7

Photo

Click or tap here to enter text.



Description:

Photo of water intake station. Water is pumped from Camp Lake to provide water for the Mary River Mine Site.

Photo No. 8

Photo

Click or tap here to enter text.



Description:

Camp Lake water intake.



Photo No. 9

Photo

Click or tap here to enter text.



Description:

Hazardous waste was found sitting outside the designated storage location out of the berm.

Photo No. 10

Photo

Click or tap here to enter text.



Description:

Hazardous waste was found sitting outside the designated storage location out of the berm.

Photo No. 11

Photo

Click or tap here to enter text.



Description:

Hazardous waste was found sitting outside the designated storage location out of the berm.

Photo No. 12

Photo

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Description:

The hazardous waste was placed inside the berm within secondary containment the following day.



Photo No. 13

Photo

Click or tap here to enter text.



Description:

The hazardous waste was placed inside the berm within secondary containment the following day.

Photo No. 14

Photo

Click or tap here to enter text.



Description:

Photo showing culvert/road work that was completed downgrade of the tank farm to repair and prevent a washout happening again.



Photo No. 15

Photo

[Click or tap here to enter text.](#)



Description:

Photo showing culvert/road work that was completed downgrade of the tank farm to repair and prevent a washout happening again.

Photo No. 16

Photo

[Click or tap here to enter text.](#)



Description:

Photo showing culvert/road work that was completed downgrade of the tank farm to repair and prevent a washout happening again.



Photo No. 17

Photo

Click or tap here to enter text.



Description:

Photo showing culvert/road work that was completed downgrade of the tank farm to repair and prevent a washout happening again.

February 16, 2026

Sean Naullaq
Resources Management Officer
Crown Indigenous Relations and Northern Affairs (CIRNAC)
Nunavut District, Nunavut Region
P.O. Box 100
Iqaluit, NU X0A 0H0

Re: Baffinland Response to October 2025 CIRNAC Inspection

The following submission from Baffinland Iron Mines Corporation (Baffinland) is a follow up in response to the Water Licence Inspection¹ conducted from October 8 to October 15, 2025, at Baffinland's Mary River Project (the Project), by Crown-Indigenous Relations Northern Affairs Canada (CIRNAC). The attached Table 1 provides a summary of follow up information and updates requested by CIRNAC in their Inspection Report issued January 14, 2026.

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

Regards,

A handwritten signature in black ink, appearing to read "Todd Swenson".

Todd Swenson

Environmental Superintendent

Cc: Karén Kharatyan, Nidhi Singh (NWB)
Jeremy Fraser, Omer Pasalic (CIRNAC)
Megan Lord-Hoyle, Lou Kamermans, Francois Gaudreau, William Bowden, Laurence Serra, Allison Parker, Irniq Lecompte (Baffinland)

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Attachment 2 – Photos

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Attachment 1**Baffinland Response to CIRNAC 2023 September Inspection Report**

Table 1: Baffinland Responses to CIRNAC 2025 October Inspection Report

Section	Description	Baffinland's Response
2	Hazardous waste was observed outside of secondary containment and was placed into secondary containment the following day.	No response required.