Crown-Indigenous Relations and Northern Affairs Canada
Relations Couronne-Autochtones et Affaires du Nord Canada

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

Your file - Votre référence
2AM-MRY2540
Our file - Notre référence
GCDocs# 148513306

July 15, 2026

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

Re: Crown-Indigenous Relations and Northern Affairs Canada's review of Baffinland Iron Mine Corporation's 2025 Annual Report for Type A Water Licence 2AM-MRY2540 for the Mary River Project

Dear Mr. Hunter,

Thank you for the invitation to review the 2025 Annual Report for Type A Water Licence 2AM-MRY2540 for the Mary River Project (the "Water Licence").

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the application pursuant to its mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Crown-Indigenous Relations and Northern Affairs Act*. Please find CIRNAC comments and recommendations in the attached Technical Memorandum.

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

Sincerely,

Lauren Perrin,
Water Management Specialist

Canada

Crown-Indigenous Relations and Northern Affairs Canada | Relations Couronne-Autochtones et Affaires du Nord Canada

Technical Review Memorandum

Date: July 15, 2026

To: Robert Hunter– Licensing Administrator, Nunavut Water Board

From: Lauren Perrin– Water Management Specialist, CIRNAC

Subject: **Crown-Indigenous Relations and Northern Affairs Canada's review of Baffinland Iron Mine Corporation's 2025 Annual Report for Type A Water Licence 2AM-MRY2540 for the Mary River Project**

Region: ☐ Kitikmeot ☐ Kivalliq ☒ Qikiqtani

A. BACKGROUND

The Mary River Project is an operating high-grade iron mine located in the Qikiqtani Region of Nunavut, on northern Baffin Island. The mine is owned and operated by Baffinland Iron Mines Corporation (Baffinland) and includes the Mine Site, the Milne Port site, and a 100 km-long Tote Road connecting the two sites. The current approved project allows iron ore production through open pit mining. Part B Item 2 of Water Licence 2AM-MRY2450 (the "Water Licence") requires the proponent to submit an Annual Report for operations.

The Project has gone through a number of important milestones prior to operating at the 2024 approved production rate of 6 Million Tonnes Per Annum (Mtpa). Baffinland's initial proposal consisted of mining iron ore from the reserve at Deposit No. 1 at a production rate of 18 Mtpa (with operational flexibility) and using a port south of the mine in Steensby Inlet, serviced by an approximately 149 Km Steensby Railway to transport the ore to market (i.e., Southern Transportation Corridor; Figure 1). The NIRB issued Project Certificate No. 005 for this proposal on December 28, 2012.

From 2013 to 2014, in response to changing iron ore market price conditions, Baffinland prepared an alternative development approach, the Early Revenue Phase (ERP), supported by an addendum to the Final Environmental Impact Statement (FEIS) for the Mary River Project. The Project Certificate was subsequently amended to include the mining of 4.2 Mtpa of ore to be hauled on the existing Milne Inlet Tote Road (Tote Road) north to a port at Milne Inlet (Milne Port). In 2018, 2020 and 2022 the Project Certificate was amended following approval of the Production Increase Proposal (PIP), PIP Extension Request, and PIP Renewal (PIPR), allowing for up to 6 Mtpa to be transported and shipped through Milne Port until the end of 2022. In the fall of 2023, the Nunavut Impact Review Board (NIRB) returned positive recommendations to the responsible Minister for Baffinland's Sustaining Operations Proposal (SOP). As a result, Baffinland continued to operate at 6 Mtpa for the remainder of 2023 and for the duration of 2024. The SOP included approval to ship any remaining ore at Milne Port as of 2022 offsite during subsequent shipping seasons. This allowed Baffinland to continue to operate with no changes to the Early Revenue Phase (ERP) approval conditions.

To adapt to evolving iron ore market price conditions and support the long-term sustainability of the Project, Baffinland suspended the Sustaining Operations Proposal 2 (SOP2) application for the 6.0 Mtpa trucking operation in the fall of 2024. A reduction in workforce was implemented to align with a 4.2 Mtpa operation. In 2025 Baffinland had indicated a focus on maintaining a scaled back version of the current operation while also focusing efforts and resources on the development of the Steensby Component of the Project.

Following the March 31, 2026 submission, the Nunavut Water Board provided notification of Baffinland's submission of the 2025 Annual Report for the Mary River Project and invited comments. A summary of the

subjects of Crown-Indigenous Relations and Northern Affairs Canada's (CIRNAC) comments and recommendations regarding the Annual Report are listed in Table 1. Documents reviewed as part of this submission can be found in Table 2 of Section B. Detailed technical review comments are in Section C.

Table 1: Summary of Recommendations

Recommendation Number	Subject
R-01	**Review of Previous CIRNAC Annual Report Recommendations (2023 to 2024)**
R-02	**Water Reporting (Schedule B, Items 1 to 4)**
R-03	**Waste Reporting (Schedule B, Items 5 to 8)**
R-04	**Hazardous Waste Generation Tracking (Schedule B, Item 9)**
R-05	**Landfill Waste Disposal Volumes (Schedule B, Item 11)**
R-06	**Hydrocarbon Impacted Soil and Water Landfarm Volumes(Schedule B, Item 12)**
R-07	**Landfill Seepage Quantities and Analysis (Schedule B, Item 15)**
R-08	**Solid Waste Disposal (Schedule B, Item 16)**
R-09	**Dustfall Review (Schedule B, Item 18)**
R-10	**Unauthorized Discharges (Schedule B, Item 19)**
R-11	**Spill Contingency Plan Update Summary (Schedule B, Item 21)**
R-12	**AEMP Deficiencies (Schedule B, Item 23)**
R-13	**Modifications related to KM105 Surface Water Management Pond (MS-11) (Schedule B, Item 22)**
R-14	**Monitoring Program Deficiencies (Schedule B, Item 25)**
R-15	**WRF Progressive Closure (Schedule B, Item 27)**
R-16	**Plans / Reports / Studies related to Reclamation (Schedule B, Item 30)**
R-17	**Plans / Reports / Studies related to Water Use (Schedule B, Item 30)**
R-18	**Geochemical Analyses of Construction Material (Schedule B, Item 34 and Item 42)**
R-19	**Mine Site Water Management Plan (Schedule B, Item 38)**
R-20	**Aggregate Usage (Schedule B, Item 39)**

B. DOCUMENTS REVIEWED AND REFERENCED

The following table (Table 2) provides a list of the documents reviewed under the submission and reference during the review.

Table 2: Documents Reviewed and Referenced

Document Title	Author, File No., Rev., Date
2025 QIA-NWB 2025 Annual Report for Operations	Baffinland Iron Mines Corporation, 31 March 2026
Appendix A Water Licence Concordance Table	Baffinland Iron Mines Corporation, 31 March 2026
Appendix A.2 Commercial Lease Concordance Table	Baffinland Iron Mines Corporation, 31 March 2026
Appendix B Annual Report Form	Baffinland Iron Mines Corporation, 31 March 2026
Appendix C.1.1 – As-Built Report Crusher Pad Laydown	Baffinland Iron Mines Corporation, various dates

Document Title	Author, File No., Rev., Date
Appendix C.1.2 – Construction Summary Report CV-187 Culvert Replacement	Baffinland Iron Mines Corporation, 31 March 2026
Appendix C.1.3 – As-Built Report Magazine Explosives Berm	Baffinland Iron Mines Corporation, 31 March 2026
Appendix C.1.4 – As-Built Report Milne Port Culvert and Sump	Baffinland Iron Mines Corporation, 31 March 2026
Appendix C.1.5 – As-Built Report Mary River Geocell Installation	Baffinland Iron Mines Corporation, 31 March 2026
Appendix C.1.6 – 2025 Borrow Pit Reclamation Report	Baffinland Iron Mines Corporation, 31 March 2026
Appendix C.1.7 – As-Built Report Tote Road Bridges Approach Remediation	Baffinland Iron Mines Corporation, 31 March 2026
Appendix C.1.8 – As-Built Report Tote Road Km 64 Geocell Installation	Baffinland Iron Mines Corporation, 31 March 2026
Appendix C.2 – Geotechnical Inspection Report	Baffinland Iron Mines Corporation, 31 March 2026
Appendix C.3 – Tote Road Fish Habitat Monitoring 2025	Baffinland Iron Mines Corporation, 31 March 2026
Appendix C.4 – 2025 Tote Road Priority Actions	Baffinland Iron Mines Corporation, 31 March 2026
Appendix D.1 – Mine Site Photo Journal	Baffinland Iron Mines Corporation, 31 March 2026
Appendix D.2 – Tote Road Photo Journal	Baffinland Iron Mines Corporation, 31 March 2026
Appendix D.3 – Milne Port Photo Journal	Baffinland Iron Mines Corporation, 31 March 2026
Appendix D.4 – Steensby, Midrail, Brucehead Photo Journal	Baffinland Iron Mines Corporation, 31 March 2026
Appendix D.5 – Community Engagement Photo Sheet	Baffinland Iron Mines Corporation, 31 March 2026
Appendix E.1 – Waste Backhaul – Annex Manifests	Baffinland Iron Mines Corporation, 31 March 2026
Appendix E.2 – Incinerator Ash Tables	Baffinland Iron Mines Corporation, 31 March 2026
Appendix E.3 – 2025 Surveillance Network Program – Hydrometric Monitoring Report	North Water Environmental Consulting and Contracting, 24 March 2026
Appendix E.4 – Shipping Manifests (Inbound and Outbound)	Baffinland Iron Mines Corporation, 31 March 2026
Appendix E.5	N/A
Appendix E.6 – Waste Rock Geochemistry Analytical Sampling Results	Baffinland Iron Mines Corporation, 31 March 2026
Appendix E.7	N/A
Appendix E.8.1 – CIRNAC Inspection Reports	CIRNAC, various dates
Appendix E.8.2 – QIA Inspection Reports and Responses	QIA, various dates
Appendix E.8.3 – 2025 Initial and Follow-Up Spill Reports	Baffinland Iron Mines Corporation, 31 March 2026
Appendix E.8.4 – Request to Amend Reporting Requirements for Quarry and Landfill Operations	Baffinland Iron Mines Corporation, 31 March 2026
Appendix E.9.1 – 2025 Aquatic Effects Monitoring Program (AEMP)– Hydrometric Monitoring Report	North Water Environmental Consulting and Contracting, 26 March 2026

Document Title	Author, File No., Rev., Date
Appendix E.9.2 - Mary River Project 2025 Core Receiving Environmental Monitoring Program Report (CREMP)	Trinity Consultants Canada, 31 March 2026
Appendix E.9.3 – Mary River Project - Lake Sedimentation Monitoring Program Report – 2024/2025	Trinity Consultants Canada, 19 March 2026
Appendix E.10.1 – Deposit No.1: Open Pit Water Balance and Water Quality Model Report – Operations and Early Closure	Nunami Stantec Limited, 5 December 2025
Appendix E.11 – 2025 Groundwater Report	WSP Canada Inc., 26 February 2026
Appendix E.12 – Surveillance Network Program (SNP) Modification Application	Baffinland Iron Mines Corporation, 31 March 2026
Appendix E.13.1 – Responses to Intervenor Comments on the 2025 QIA-NWB Annual Report for Operations	Baffinland Iron Mines Corporation, 31 March 2026
Appendix E.13.1E – 2024 Q4 Waste Rock Management Compliance Report	Baffinland Iron Mines Corporation, 31 March 2026
Appendix E.13.1F – Technical Memorandum: Waste Rock Facility Drilling and Sampling Campaign, Cover Requirement Evaluation	WSP, 30 January 2025
Appendix E.13.2 – Public Hearing Commitments Progress Summary Table	Baffinland Iron Mines Corporation, 31 March 2026
Appendix E.13.4 – 2025 Steensby Rail Corridor Hydrometric Monitoring Report	North Water Environmental, 27 March 2026
Appendix E.14 – MDMER Annual Reports	Baffinland Iron Mines Corporation, 31 March 2026
Appendix E.15 – Technical Services Waste Rock Facility (WRF) Annual Report	Baffinland Iron Mines Corporation, 31 March 2026
Figures	Baffinland Iron Mines Corporation, 31 March 2026
Tables	Baffinland Iron Mines Corporation, 31 March 2026
QIA Comments	QIA, 16 May, 2025
Type “A” Water Licence No. 2AM-MRY2540	Nunavut Water Board, 25 April 2025
Phase 1 Waste Rock Management Plan, Rev 4.1	Baffinland Iron Mines Corporation, 2 April, 2024
Fresh Water Supply, Sewage, and Wastewater Management Plan, Rev. 12	Baffinland Iron Mines Corporation, 31 March 2026
Monthly Monitoring Reports (Water Licence No. 2AM-MRY2540)	Baffinland Iron Mines Corporation, various dates 2024 through 2025

C. RESULTS OF REVIEW

1. Review of Previous CIRNAC Annual Report Recommendations (2023 to 2024)

Comment:
A summary of outstanding CIRNAC recommendations from the 2023 to 2024 QIA-NWB Annual Report reviews from are provided in the attached Table A. For each outstanding recommendation CIRNAC has provided a status to indicate if a past recommendation was 'Not Addressed' 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.

Recommendation:
(R-01) CIRNAC recommends that the Board review the outstanding issues and recommendations identified since 2023, as outlined in Table A. Despite repeated identification through annual report reviews, several licence requirements remain unresolved. CIRNAC considers the continued lack of progress on these matters to be indicative of ongoing non-compliance with Water Licence 2AM-MRY2540.

CIRNAC requests that the Board exercise its authority to ensure Baffinland resolves these outstanding items to achieve compliance with all applicable licence conditions including the items listed in Table A in the NWB's own review of the Annual Report and at the next opportunity, include in the license a condition requiring that the proponent provide meaningful updates on actions or works undertaken to achieve compliance and address all outstanding recommendations.

2. Water Reporting (Schedule B, Items 1 to 4)

Comment:
The Annual Report presents freshwater withdrawal volumes in Section 4 (Tables 4.1–4.5); however, reporting does not fully meet the requirements of Schedule B Items 1–4. Water withdrawal volumes are primarily presented in aggregated form and do not clearly distinguish between Inuit-Owned Land and Crown Land sources, limiting verification of source-specific reporting required under Items 1 and 2. While combined withdrawal volumes appear to be provided and generally satisfy Item 3, these are not explicitly identified as fulfilling the combined reporting requirement, reducing clarity and traceability. For Item 4, reclaimed and recycled water volumes and uses are included, but the reporting structure does not clearly distinguish these volumes from other sources or explicitly link quantities to specific purposes. Overall, Baffinland is considered partially compliant: Item 3 is largely met, whereas Items 1, 2, and 4 are not fully met due to insufficient disaggregation and clarity in reporting.

Recommendation:
(R-02) CIRNAC recommends the following for Baffinland:

a. Clearly label combined withdrawal totals as meeting the Item 3 requirement; and
b. Present reclaimed and recycled water volumes in a dedicated, structured table that includes monthly and annual totals and directly links volumes to their specific uses. Where no withdrawals occur for a given land category, this should be explicitly stated.

3. Waste Reporting (Schedule B, Items 5 to 8)

Comment:
Based on the review of Sched B Items 5 to 8, Baffinland appears to be generally compliant with Items 5 and 7, as the Annual Report includes monthly and annual discharge volumes for treated sewage effluent (Section 5.1.1, Table 5.1) and SWM pond effluent (Section 5.1.3, Table 5.4). However, Items 6 and 8 are assessed as partially compliant.

For Item 6, while discharge sources and receiving environments are described, the report does not clearly distinguish or quantify volumes of wastewater treated through the Oily Water Treatment System (OWTS) versus other compliant discharges. For Item 8, although sludge volumes and disposal practices are described, the report lacks a clear linkage between reported sludge quantities and specific disposal methods and/or locations in a consolidated format.

Recommendation:
(R-03) CIRNAC recommends that Baffinland:

a. Provide a dedicated summary table (monthly and annual) explicitly reporting wastewater volumes treated and discharged via each OWTS facility, or clearly confirm how these volumes are represented within existing tables; and
b. Include a consolidated sludge management summary table that links sludge volumes generated at each sewage treatment plant to their respective disposal methods and locations (e.g., incineration vs. off-site disposal/backhaul).

4. Hazardous Waste Generation Tracking (Schedule B, Item 9)

Comment:
Per Type 'A' Water Licence, Schedule B, Item 9, Baffinland should provide the monthly and annual volume in cubic metres of Hazardous Waste generated and transported from the Project sites to Licensed facility outside of Nunavut for treatment. The Annual Report does not provide a clear or compliant summary of monthly and annual hazardous waste volumes generated and transported off-site for treatment. While quantities of materials shipped off-site are presented in Appendix E.1, they are not distinctly separated into hazardous waste streams, nor are they summarized on a monthly basis as required.

Additionally, the Report references Table 4.2 as containing annual hazardous waste volumes; however, Table 4.2 pertains to water use and does not include hazardous waste data. This inconsistency reduces traceability and suggests that the requirement has not been adequately addressed.

Recommendation:
(R-04) CIRNAC recommends Baffinland provide a table summarizing the monthly and annual volumes (m^3) of hazardous waste generated and transported from the Project site to licensed off-site treatment facilities. The response should:

a. Clearly distinguish hazardous waste from other waste/material categories (e.g., dangerous goods, non-hazardous materials);
b. Provide both monthly and total annual volumes;
c. Identify receiving facilities where applicable; and
d. Clarify and correct the reference to Table 4.2, ensuring all cited tables accurately correspond to hazardous waste reporting.

5. Landfill Waste Disposal Volumes (Schedule B, Item 11)

Comment:
Per Type 'A' Water Licence, Schedule B, Item 11, Baffinland should provide the monthly and annual volume in cubic metres of Waste deposited at each Landfill Facility. The Annual Report includes a total annual landfill volume (3,570 m³); however, it does not provide a clear monthly or facility-specific breakdown of waste deposited at each landfill, as required under Schedule B.

While it is acknowledged that QIA has agreed to accept an annual summary for reporting purposes, the Water Licence requirement explicitly specifies both monthly and annual volumes, and this requirement is not fully met. In addition, the reporting does not clearly distinguish landfill volumes by individual facility, limiting traceability and assessment of landfill performance across the Project.

Recommendation:
(R-05) CIRNAC recommends Baffinland provide a table summarizing the monthly and annual volumes (m³) of waste deposited at each landfill facility for the reporting period. The response should:

a. Include both monthly and total annual volumes in accordance with the Water Licence requirements;
b. Break down waste volumes by individual landfill facility;
c. Clarify any deviations from Water Licence reporting requirements (e.g., QIA-approved reporting formats); and,
d. Confirm whether the reported total annual volume of 3,570 m³ represents all landfill facilities combined or a subset of facilities.

6. Hydrocarbon Impacted Soil and Water Landfarm Volumes (Schedule B, Item 12)

Comment:
Per Type 'A' Water Licence, Schedule B, Item 12, Baffinland should provide monthly and annual volume in cubic metres of hydrocarbon impacted soil and water deposited at each Landfarm Facility. Section 5.2.4 of the Annual Report provides a total annual volume of hydrocarbon-impacted material managed at the landfarm (~75 m³), and confirms that impacted soil was transferred from Milne Port to the Mine Site landfarm and that no PHC-impacted water was managed during the reporting period. However, the reporting does not meet Schedule B requirements, as:

- Monthly soil volumes are not provided;
- Landfarm inputs are not clearly broken out by facility;
- Volumes transferred between project sites (e.g., Milne Port to Mine Site) are not explicitly quantified in a traceable format; and
- Referenced sections and tables (e.g., Sections 5.2.4, 5.1.2, Table 5.3) are not clearly integrated, reducing transparency and auditability.

As a result, the requirement to provide monthly and annual volumes of hydrocarbon-impacted soil and water deposited at each landfarm facility has not been fully met.

Recommendation:
(R-06) CIRNAC recommends Baffinland provide a table summarizing the monthly and annual volumes (m³) of hydrocarbon-impacted soil and water deposited at each landfarm facility including the following:

a. Provide monthly and total annual volumes of hydrocarbon-impacted soil deposited at each landfarm facility;

b. Explicitly confirm that no hydrocarbon-impacted water was managed during the reporting period, or provide volumes if applicable;
c. Clearly quantify and track material transfers between Project sites (e.g., volumes transferred from Milne Port to Mine Site landfarm);
d. Identify receiving landfarm facility locations; and
e. Consolidate information currently distributed across Sections 5.2.4, 5.1.2, and Table 5.3 into a single, clear summary table in the body of Annual Report.

7. Landfill Seepage Quantities and Analysis (Schedule B, Item 15)

Comment:
Per Type 'A' Water Licence, Schedule B, Item 15, a summary of quantities and analysis of seepage and runoff monitoring from the "Landfill Facilities, Landfarm facilities, and any other relevant facilities including ponds embankment dam" are to be included in the Annual Report. The Appendix A.1 concordance table specifies that the report reference is Section 7, Table 7.2 and Table 7.3. In reviewing these sections, CIRNAC notes that no summary of quantities or analysis is provided. For example:

- Section 7.3.2. states that there are two landfill monitoring stations (MS-MRY-13A and MS-MRY-13B) but no summary of quantities or analysis is provided.
- Section 7.3.2 references daily surface flows are presented in Appendix E.3. A review of Appendix E.3 shows that flows are not provided and there is no summary of quantities or analysis.
- Table 7.1 provides a list of water monitoring locations; however, no descriptions contain reference to seepage(s). Documentation of seepage monitoring is not clearly provided. The presence or absence of seepages at key project facilities should be documented throughout the summer months where melt and shallow groundwater flow through the active zone occurs.
- The Annual Report provides no quantity assessment/ estimates for seepage or analytical results for key project areas (e.g., landfills, landfarms, crusher facility, waste rock facility, Tote Road, Milne Port, Milne Port ore stock pile facility, KM106 ore stockpile, surface water management ponds, Deposit No. 1, etc.).

Recommendation:
(R-07) CIRNAC recommends Baffinland provides the required quantity and analysis data for site facilities seepage and summarizes the data within the body of the Annual Report.

8. Solid Waste Disposal (Schedule B, Item 16)

Comment:
Per Type 'A' Water Licence, Schedule B, Item 16, Baffinland should provide a summary report of solid waste disposal activities including monthly and annual quantities in cubic metres of waste generated and location of disposal. Section 5.2 of the Annual Report provides a total annual quantity of solid waste generated (~3,470 m^3); however, the reporting does not fully meet Schedule B requirements. Specifically:

- Waste quantities are presented as an aggregate total, without a monthly breakdown;
- Waste volumes are not clearly assigned to specific disposal locations (e.g., Mine Site landfill, Milne Port waste management facilities, or other sites);
- It is unclear whether the reported volume includes waste generated from all project components (e.g., Bruce Head Camp, Milne Port, Mine Site); and
- The Annual Report lacks clear traceability linking waste generation, transport (if applicable), and final disposal location.

As a result, the requirement to provide a summary of solid waste disposal activities, including monthly and annual quantities and disposal locations, has not been fully met.

Recommendation:
(R-08) CIRNAC recommends Baffinland provide a table summarizing monthly and annual volumes (m^3) of solid waste generated and disposed of during the reporting period. The response should:

a. Present monthly and total annual waste volumes;
b. Identify disposal location(s) for all waste (e.g., Mine Site landfill, Milne Port facilities, other disposal locations);
c. Clearly indicate whether volumes include all Project components (including Bruce Head Camp and other satellite facilities);
d. Distinguish, where applicable, between waste generated, transported, and disposed; and
e. Ensure consistency with values reported in Section 5.2 and Table 5.5.

9. Dustfall Review (Schedule B, Item 18)

Comment:
Per Type 'A' Water Licence, Schedule B, Item 18, the 2025 Annual Report must include a dustfall review, and the outcomes of the dustfall data review shall be integrated into the relevant management plans within six months of its publication. The Annual Report does not specify if the Dustfall review was conducted as part of the 2025 Annual Report, but that a *" memorandum summarizing the dustfall program will be included in the TEAMR associated with the 2025 NIRB Annual Report "* (Appendix A.1).

Recommendation:
(R-09) CIRNAC recommends that Baffinland:

a. Provide a statement to confirm that the Dustfall review was completed as part of the 2025 QIA-NWB Annual Report; and
b. Provide the dustfall data review memorandum in the TEAMR as specified in Appendix A.1. The memorandum should explicitly specify all of the relevant management plans that will be updated in 2026 with the outcomes of the dustfall data review.

10. Unauthorized Discharges (Schedule B, Item 19)

Comment:
The Annual Report includes a list and description of unauthorized discharges, with supporting information provided in Section 6.1, Tables 6.1 and 6.2, and Appendix E.8.3. While the requirement is generally met, there are three reported spill events for which discharge volumes have not been quantified. As Item 19 explicitly requires the reporting of spill volumes, the absence of this information creates a data gap and limits the ability to fully assess the magnitude and potential environmental effects of these incidents.

Recommendation:
(R-10) CIRNAC recommends that Baffinland provide a clear rationale for why spill volumes could not be estimated for the three identified events, including a description of any constraints (e.g., detection limitations, timing, or site conditions). Where feasible, Baffinland should apply reasonable estimation methods (e.g., visual estimates, material balance calculations, or standard spill estimation approaches) to estimate the volumes. Future reporting should ensure that volume estimates are included for all spill incidents, or that documented justification is consistently provided where quantification is not possible.

11. Spill Contingency Plan Update Summary (Schedule B, Item 21)

Comment:
Schedule B, Item 21 is to provide a summary of any updates or revisions to the Spill Contingency Plan (SCP). Based on the information presented in Section 9.2 and Table 9.1, Baffinland has not included a summary of updates or revisions in the current Annual Report. Instead, they note that the SCP is anticipated to be reviewed and revised in 2026, if applicable. While the commitment to review and revise the SCP is noted, there is no confirmation of whether updates occurred during the 2025 reporting period or a clear statement that no revisions were required.

Recommendation:
(R-11) CIRNAC recommends Baffinland explicitly address Item 21 by either:

a. Providing a concise summary of any updates or revisions made to the SCP during the 2025 reporting period; or
b. Clearly stating that no updates or revisions were required, along with supporting rationale.

In addition, results from the practical deployment exercises referenced in Section 6.1 should be synthesized and incorporated into the SCP, with a summary of key findings included in the Annual Report. Baffinland should confirm that these findings will inform the next SCP revision and commit to submitting the updated SCP to the NWB within 90 days from the end of the comment period.

12. AEMP Deficiencies (Schedule B, Item 23)

Comment:
Per Type 'A' Water Licence, Schedule B, Item 23 requires that the results of the AEMP framework and other monitoring requirements are provided in the Annual Report. An overview of what the AEMP is included in Section 7.6 within the report but none of the results are discussed.

The report references Appendix E.9 which includes three separate investigations: Environmental Effects Monitoring Program, Core Receiving Environment Monitoring Program (Appendix E.9.2) and Lake Sedimentation Monitoring Program (Appendix E.9.3). The studies for the Environmental Effects Monitoring Program, Dustfall Monitoring Program and Stream Diversion Barrier Study are absent from the Annual Report; accordingly, Baffinland is not in compliance with this requirement.

Additionally, the AEMP is intended to be an 'umbrella' that provides an opportunity to integrate results of the individual but related aquatic monitoring programs. The Annual Report states that the AEMP specifically is a monitoring program designed to:

- Detect the short-term and long-term effects of the Project's activities on the surrounding aquatic environment resulting from the Project;
- Provide data to evaluate the accuracy of impact predictions;
- Identify mitigation measures to avert or reduce unforeseen environmental effects; and
- Provide data to assess the effectiveness of mitigation measures.

Within the annual report there is no integration of the various studies to present an overarching interpretation of study results.

Recommendation:
(R-12) CIRNAC recommends Baffinland include the missing studies that comprise the AEMP which includes the Environmental Effects Monitoring Program, Dustfall Monitoring Program and Stream Diversion Barrier

Study. CIRNAC also recommends that Baffinland include a summary of the individual studies that integrates the results of the various studies to meet objectives and design of the AEMP.

13. Modifications related to KM105 Surface Water Management Pond (MS-11) (Schedule B, Item 22)

Comment:
The KM105 surface water management pond (MS-11) is a major water management feature for the mine area (Deposit, Haul Road and hillside disturbed areas), and there have been major changes and updates to it. MS-11 has been reconfigured from its initial design intent of “retention and release” impoundment to a flow through system. The flow through system has new construction and operation components. The construction of a new filter berm across its flow regime, a capture and release system on the downstream of this facility, and a series of check dams on its upstream flow tributary are the main construction components. Flocculation/Coagulations induction systems on its upstream course and a polishing system on its downstream course are its new operational components.

There has been a shift from a single source of treatment to an adaptive linear response system spread over a large watercourse. It has been reported that the filter berm provides effective sedimentation control. However, it was not mentioned whether all the flows are reporting to the polishing pond and final discharge point or if some bypass the system and report elsewhere.

The sedimentation issue might have been addressed on an adaptive basis, but the overall geotechnical stability concerns remain. The geotechnical inspection has identified erosion and boiling phenomenon where the seepage daylights on the downstream of the main dam. If this is left unchecked and uncontrolled, it may expand and resume a problematic configuration and it has the potential to cascade to instability of the dam. This must be addressed; a similar situation may repeat elsewhere, if and where the seepage flow report other than immediately on the downstream of the main dam.

No design modification reports, nor an updated operations manual (OMS), neither the as-built reports reflecting these changes have been provided.

Recommendation:
(R-13) CIRNAC recommends Baffinland to provide the design, as-built and OMS reports to reflect these major construction and operational changes and updates. MS-11 sedimentation system is a main surface water feature in the mine area and there is a need for a robust system designed to withstand an extreme climatic event and its associated sediment load.

14. Monitoring Program Deficiencies (Schedule B, Item 25)

Comment:
Per Type ‘A’ Water Licence, Schedule B, Item 25 requires that tabular summaries of the results and interpretation of all data generated under the monitoring program in Part I and Schedule I. Section 7, Table 7.2 and 7.3 present tabular summaries of some monitoring results but no interpretation of all the data generated under the monitoring program is provided; accordingly, Baffinland is not in compliance with this requirement. Specifically:

- Monitoring data are presented in tabular form (e.g., Table 7.2), but these largely constitute raw data summaries without integrated interpretation or synthesis;

- While some tables include comparison criteria or guidelines, there is limited discussion of exceedances, trends, or implications for environmental performance;
- Groundwater monitoring is referenced for certain facilities (e.g., landfill and hazardous waste berm), with additional detail provided in Appendix E.11; however, there is no clear integration of these results into the main report, and no assessment of conditions at facilities where groundwater monitoring is absent (e.g., other waste management facilities);
- There is no clear, consolidated interpretation across media (surface water, groundwater, effluent) linking results to regulatory limits, trigger thresholds, or management responses.
- Not all of the tabulated data for the QA/QC program are included in the Core Receiving Environmental Monitoring Program (CREMP) and no analytical files are included to verify the results of the program.
- Methodology for surface water and seepage flow calculations and confirmation of monitoring frequency and sampling parameters remains unclear in the Fresh Water Supply, Sewage and Wastewater Management Plan v12.

Recommendation:
(R-14) CIRNAC recommends that Baffinland provide a revised summary of monitoring results that includes both tabulated data and interpretation for all data generated under the Monitoring Program in Part I and Schedule I.

The summary should:

a. Include an interpretation of monitoring results, identifying any exceedances of regulatory limits or guidelines, temporal trends (monthly/annual), and spatial patterns across monitoring locations;
b. Integrate results across all relevant media (e.g., surface water, groundwater, effluent, seepage);
c. Incorporate and summarize findings from supporting appendices (e.g., Appendix E.11 – groundwater monitoring) within the main report;
d. Identify any data gaps (e.g., facilities without groundwater monitoring such as the Waste Rock Facility) and provide justification;
e. Describe any management actions or responses triggered by monitoring results.
f. Present all of the QA/QC data collected during the monitoring programs.
g. Include methodology and back-up data for how flow rates and/or discharge volumes are calculated at each surface water and seepage monitoring location (as per CIRNAC R-20 in reference to the 2024 Annual Report; See Table A).

15. WRF Progressive Closure (Schedule B, Item 27)

Comment:
Per Type 'A' Water Licence, Schedule B, Item 27, Baffinland should provide a summary of any progressive closure and reclamation work undertaken, including photographic records of site conditions before and after completion of operations, and an outline of any work anticipated for the next year (2026 to end of 2027), including any changes to implementation and scheduling. There is no mention of the progressive reclamation of the WRF; Baffinland met the terms and conditions for the Borrow Pits and KM97 work.

The WRF QA/QC statement asserts that all waste deposition was conducted in accordance with the Waste Rock Management Plan (WRMP) and that results are presented in Tables 9.2/9.3 and Figure 13; however, the supporting information is incomplete. The purpose of the QA/QC program was to evaluate whether the progressive reclamation of the WRF was being completed properly to minimize exposed PAG rock at the end of each year and tied back to securities held.

Confirmatory sampling results were not provided in Q4 2025. QA/QC results are not summarized across all quarterly programs and Figure 13 presents a limited geochemical dataset with insufficient metals characterization. As a result, compliance with the QA/QC program and WRMP is asserted but not demonstrated.

Recommendation:
(R-15) CIRNAC recommends Baffinland provide a complete summary of WRF QA/QC results for the reporting period. The response should:

a. Include all quarterly QA/QC results, clearly consolidated;
b. Confirm whether confirmatory sampling was conducted in Q4, and provide results or justification if not completed;
c. Provide a complete geochemical dataset for PAG and Non-PAG rock, including full suite of metals analyses; and
d. Demonstrate how QA/QC results support compliance with the WRMP, including material classification and placement verification.

16. Plans / Reports / Studies related to Reclamation (Schedule B, Item 30)

Comment:
The Annual Report includes references to reclamation activities and research (e.g., progressive reclamation, reclamation research studies, and linkage to closure planning documents such as the Interim Closure and Reclamation Plan [ICRP]) as per Schedule B, Item 30; however, the requirement to provide a clear and concise summary of reclamation-related studies and future planned work has not been fully met. Specifically:

- Reclamation studies and research initiatives are referenced but not clearly summarized within Section 9 which limits CIRNAC's ability to understand the scope, objectives, and outcomes of the work;
- There is no consolidated or structured presentation of reclamation studies (completed, ongoing, or planned), making it difficult to distinguish between operational activities, monitoring programs, and targeted reclamation research;
- Linkages between reclamation studies and key closure planning documents (e.g., ICRP) are implied but not clearly articulated or described in a way that demonstrates how studies inform closure strategies and performance;
- While future reclamation-related work (e.g., site-specific reclamation planning, borrow source rehabilitation, or remediation studies) is referenced in various sections of the report, there is no clear, brief description of these studies in terms of objectives, scope, or anticipated role in supporting closure and reclamation planning;
- The ICRP (Revision 6), identified as a key governing document for reclamation, is referenced but not adequately summarized within the report to contextualize associated studies and their relevance to closure outcomes.

As a result, the Annual Report does not fully satisfy the requirement to provide a clear summary of reclamation-related studies and planned future work.

Recommendation:
(R-16) CIRNAC recommends that Baffinland provide a clear and consolidated summary of all reclamation-related studies and research associated with the Project. The response should:

a. Identify and summarize all completed, ongoing, and planned reclamation studies;

b. For each study, provide a brief description including:
    (i) objectives;
    (ii) scope and methodology (where available);
    (iii) relevance to closure planning, reclamation performance, or regulatory requirements;
c. Clearly differentiate water-related studies and reclamation/closure studies as well as from general environmental monitoring programs;
d. Explicitly link reclamation studies to key planning documents (e.g., ICRP, closure plans), demonstrating how results inform reclamation design, performance evaluation, or adaptive management;
e. Provide a concise summary of the current ICRP (Revision 6), or include it as an appendix, with sufficient detail to contextualize associated reclamation studies;
f. Include a brief description of future reclamation studies, including expected timing and how results will be used to inform closure planning, design refinement, or future reporting.

17. Plans / Reports / Studies related to Water Use (Schedule B, Item 30)

Comment:
Section 9 of the Annual Report includes several studies and monitoring programs relevant to water quality and management; however, the reporting would benefit from clearer linkage to water use (e.g., water withdrawal, consumption, and reuse), and a consolidated summary of future water-related studies planned. Currently, future studies for water use are cross-referenced or discussed across the sections and are not easily identifiable as a complete set within this section.

Recommendation:
(R-17) CIRNAC recommends that Baffinland revise Section 9 by:

a. Explicitly identifying all plans, reports, and studies related to water use (including water withdrawal, management, and discharge), and
b. Providing a concise, consolidated summary of future water-related studies planned. While relevant studies and monitoring programs are presented throughout the section, they are not currently organized in a manner that clearly demonstrates full alignment with reporting requirements.

18. Geochemical Analyses of Construction Material (Schedule B, Item 34 and Item 42)

Comment:
As per Schedule B Item 34, Baffinland is required to demonstrate through geochemical analysis that the fill material used for construction is not acid generating or metal leaching. This includes materials placed within the high-water mark exclusion zone of 31 m as per Part D, Item 13, as well as materials used to construct roads, quarries and other infrastructure (Schedule B, Item 42). Tables 9.2 and 9.3 provide summarized select geochemical results for materials used in construction; however, the Annual Report does not provide sufficient supporting data to substantiate these summaries or demonstrate the materials are not metal leaching. Specifically:

- Underlying analytical data are not provided, limiting verification of reported averages;
- Analytical data demonstrating that the rock is not leachable was not provided;
- Metals analyses are limited or absent, and a full geochemical suite (e.g., CCME metals, Shake-Flask Extraction, Acid-Base Accounting) is not presented; and
- While Appendix E.6 provides pit characterization data, there is no clear linkage between rock type, geochemical results, and end-use location (i.e. WFR, Construction Placement).

As a result, the requirement to provide a summary of geochemical analyses associated with materials used in construction is only partially met.

Recommendation:
(R-18) CIRNAC recommends Baffinland provide a complete summary of geochemical analyses conducted on materials used to construct facilities and infrastructure. The response should:

a. Include supporting analytical datasets for values summarized in Tables 9.2 and 9.3;
b. Provide a comprehensive geochemical suite, including total metals (e.g., CCME metals, Shake-Flask Extraction, Acid-Base Accounting) where available;
c. Clearly identify material source locations (e.g., quarry/pit) and corresponding end-use locations (e.g., roads, pads, infrastructure); and
d. Demonstrate the linkage between geochemical characterization, material classification, and placement decisions.

19. Mine Site Water Management Plan (Schedule B, Item 38)

Comment:
Schedule B, Item 38 indicates the requirement to update, where required under Part B, Item,17, in the form of an addendum or revision to the Plans approved under relevant section of this Licence.

CIRNAC notes that the Mine Site Water Management Plan (MSWMP) and the "long-term Water Management Plan" are absent from Table 9.1 (Management and Monitoring Plan Updates for 2025) of the Annual Report, whereby the table includes the last revision date for management plans and anticipated update schedule. These plans should be included in the table, along with the last revision date.

Refer to Appendix E.13.1A in which CIRNAC recommended a review of procedures outlined in the MSWMP, including an identification of changes that are required to prevent future spills (See Table A.1.4 of the Annual Report, 2022 R-01b – Sedimentation Management During Freshet).

In response, Baffinland indicated in that "*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."*

The status of construction for the listed six facilities have been in various stages of construction since 2023 from 'not applicable' to 'constructed.' Accordingly, the MSWMP and Water Management plan should have been updated since 2023 given that two projects were completed in 2022 (including KM105 Sedimentation Pond – See R-12).

Recommendation:
(R-19) CIRNAC recommends that Baffinland provide the following:

a. Status update on revisions to the MSWMP and long-term Water Management Plan;
b. Description of changes, if any, made to the plans which address the prevention of future spills; and
c. Revision to Table 9.1 in subsequent Annual Reports to include these plans as part of the list.

20. Aggregate Usage (Schedule B, Item 39)

Comment:

Baffinland is required to provide monthly and annual quantities of aggregate excavated and used from quarries and borrow pits associated with the Licence in accordance with Schedule B, Item 39. Section 3.4 and attached Table 3.3 outline a trial period where Baffinland will provide annual reporting only; however, the provided information only documents the volume of rock, unconsolidated materials, and organics removed from quarries or borrow source areas. The provided information does not describe the usage of the material other than for “road maintenance and infrastructure construction”. CIRNAC notes that it would be useful for Baffinland to provide information on the final placement location of the aggregate material so that it can be cross-referenced to where non-PAG rock that is used as construction material is deposited.

Recommendation:
(R-20) CIRNAC recommends Baffinland include in the Annual Report a more detailed breakdown of aggregate usage including the location(s) that the materials were used and/or if unused materials were stockpiled for future usage.

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Table A – Summary of Previous CIRNAC Annual Report Review Recommendations (2021 to 2024)[1]

Reporting Year	Rec. #	Topic	CIRNAC Recommendation	Status	Due Date Assigned by CIRNAC	Notes
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.	In Progress	15-Oct-25	Reclamation activities continue along the Tote Rd disturbed areas.
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.	In Progress	15-Oct-25	See Recommendations: • 2024 R-13 (Actions to Address Inspection Reports); • 2024 R-16 (Unauthorized Discharge Reporting for Spills – Water Quality Exceedances); and • 2025 R-09 (Unauthorized Discharges).
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.	In Progress	15-Oct-25	See Recommendation 2024 R-06 (Climate Change Scenario).
2024	R-04	Quantities of Seepage/ Runoff at the WRF	(R-04) CIRNAC recommends Baffinland provide the monthly measured seepage/runoff volumes at the WRF, and all other relevant facilities.	Not Addressed	16-Oct-26	Not included in final 2025 comments – no Baffinland response. Seepage and runoff volumes at the WRF were not reported in the 2025 QIA-NWB Annual Report.

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Reporting Year	Rec. #	Topic	CIRNAC Recommendation	Status	Due Date Assigned by CIRNAC	Notes
2024	R-06	Climate Change Scenario	(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.	In Progress	16-Oct-26	Baffinland plans to complete 2D thermal modelling of the WRF active layer in 2026 and to consider multiple climate change scenarios. Results to be presented in a future version of the ICRP.
2024	R-09	Waste Rock ARD Classification	(R-09) CIRNAC recommends the addition of the drilling depths in the information provided in Table 9.2. Provide summary figures and interpretative graphs for the geochemistry results obtained on-site for waste rock. Provide the results of the off-site laboratory validation analysis (ABA and SFE) and the report of the third-party consultant.	In Progress	16-Oct-26	See Recommendations: • 2025 R-17 (Geochemical Analyses of Construction Material); and • 2025 R-19 (Aggregate Usage).
2024	R-10	Hazardous Waste Generation	(R-10) CIRNAC recommends Baffinland include a waste backhaul report and provide a summary of monthly and annual hazardous waste volumes in cubic metres produced and transported from the project sites, per Schedule B of the Water Licence.	Not Addressed	16-Oct-26	No response from Baffinland in Appendix E.13.1 of the 2025 Annual Report. 2025 annual report included backhaul report.
2024	R-12	Spill Description and Identification Number 2024-367/478	(R-12) It is recommended that Baffinland spill information is clarified for spill event ‘2024-367/478’ to ensure that the Annual Report condition (Schedule B, Item C, i-ii) was sufficiently met. It is further recommended that the date column heading for Table 6.2 be revised in future reports to differentiate between the date of the spill event and the date that the event was reported.	Not Addressed	16-Oct-26	No response from Baffinland in Appendix E.13.1 of the 2025 Annual Report.

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Reporting Year	Rec. #	Topic	CIRNAC Recommendation	Status	Due Date Assigned by CIRNAC	Notes
2024	R-13	Actions to Address Inspection Reports – Spills	(R-13) It is recommended that Baffinland spill information is clarified for spill events summarized in Section 6.1 and Table 6.2 to ensure that the Annual Report condition (Schedule B, Item C, i-ii) is sufficiently met.	Not Addressed	16-Oct-26	No response from Baffinland in Appendix E.13.1 of the 2025 Annual Report.
2024	R-16	Unauthorized Discharge Reporting for Spills – Water Quality Exceedances	(R-16) To understand unauthorized discharges related to exceedances of water quality criteria for all stations implicated by the spill events documented in Table 6.2, CIRNAC recommends Baffinland provide a tabular summary of Water Licence or Metal and Diamond Mining Effluent Regulations (MMER) exceedances by spill event, including: spill event ID, sample location ID, sample date/time, lab result reference and relevant parameters exceeded.	In Progress	16-Oct-26	See Recommendation 2025 R-09 (Unauthorized Discharges). Spills and exceedances are reported, but no clear linkage between spill/discharge events and monitoring results is demonstrated.
2024	R-18	KM105 Surface Water Management Pond Performance	(R-18) CIRNAC recommends Baffinland provide a detailed mitigation plan and associated water management measures being completed in lieu of the grout curtain approach. It is also understood Baffinland will provide detailed reporting on any modifications and/or major maintenance work carried out on all water and waste related structures as required by the Water Licence. It is understood these modifications are still development with the third-party engineer; in the interim please provide a schedule for completing the associated plans and a schedule for implementation.	In Progress	16-Oct-26	The mitigation approach for KM105 has progressed from conceptual to partially designed; however, it remains incomplete as a comprehensive mitigation plan. See Recommendation 2025 R-12 (Modifications related to KM105 Surface Water Management Pond [MS-11]).
2024	R-19	Alternative Remediation Methods for Hydrocarbon-Impacted Soils	(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.	In Progress	16-Oct-26	Baffinland has acknowledged CIRNAC's recommendations and has engaged with a qualified engineering consultant to develop a northern-appropriate Landfarm Operations Plan and PVP. This work is scheduled for 2026.

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Reporting Year	Rec. #	Topic	CIRNAC Recommendation	Status	Due Date Assigned by CIRNAC	Notes
2024	R-20	Schedule I Monitoring Requirements	(R-20) CIRNAC requests Baffinland: 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.	In Progress	16-Oct-26	Methodology for flow calculations and confirmation of monitoring frequency/parameters remain unclear in the Fresh Water Supply, Sewage and Wastewater Management Plan v12. See Recommendation 2025 R-13 (Monitoring Program Deficiencies).

[1] CIRNAC Recommendations (2021 to 2024) that are considered to be ‘addressed’, ‘carried forward’ to, or ‘superceded’ by subsequent recommendations were removed from the table for ease of review.