



Fisheries and Oceans
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Pêches et Océans
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Région de l'Arctique
Programme de protection du poisson et de son habitat
301-5204 50th Ave
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Your file *Votre référence*
2AM-MRY2540

Our file *Notre référence*
07-HCAA-00050

July 17, 2026

Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU
X0B 1J0
Via email to:

Subject: Baffinland Iron Mines Corporation– 2026 NWB Annual Report for Operations of BIMC's Water Licence

The Fish and Fish Habitat Protection Program (the Program) of Fisheries and Oceans Canada (DFO) received your request on April 14, 2026 inviting parties to review and provide comments by July 17, 2026.

DFO has reviewed the above 2025 Annual Report in regards to our mandate, i.e. the management, protection, and conservation of fish and their habitats. Any comments received from DFO in this context does not relieve the proponent of obligations to respect all applicable federal legislation.

DFO has the following comments or concerns to provide at this time:

1. DFO recommends that Baffinland Iron Mines Corporation follow DFO's [Projects Near Water website](#) that provides guidance for avoiding impacts to fish and fish habitat including [Standards and codes of practice \(dfo-mpo.gc.ca\)](#) with Codes of Practice containing conditions and measures for managing risks to fish and fish habitat or Standards outlining how a specific management measure should be designed and implemented to achieve the objective.
If the Standards and Codes of Practice cannot be followed, work, activities, or undertakings in fish habitat or on watercourses that contribute to fish habitat should be submitted to DFO for review. Works including the replacement and maintenance of crossing structures, the removal of material from waterbodies/watercourses such as abutments, and placing rock armour around waterbodies have the potential to impact fish and fish habitat.
2. Suspended Sediment and Turbidity Monitoring
In cases where Baffinland Iron Mines Corporation suggests that turbidity and/or sedimentation is caused by natural process (Section 7.5), Baffinland Iron Mines Corporation should provide confirmation with sampling. Visual analysis may identify the distance a

plume travels, but the degree of suspended sediment can not be classified through aerial surveys.

- Where measured, Baffinland Iron Mines Corporation is “A potential Project related change is defined as a greater than 50 mg/L increase in TSS concentrations in the downstream sample when upstream concentrations are less than 250 mg/L.”. This does not meet the [Canadian Water Quality Guidelines for the Protection of Aquatic Life - Total Particulate Matter](#) (CCME), Suspended Sediment Guidelines. The CCME guidelines identify that:
 - During clear flow periods, anthropogenic activities should not increase suspended sediment concentrations (or nonfilterable residue levels) by more than 25 mg·L⁻¹ over background levels during any short-term exposure period (e.g., 24-h). For longer term exposure (e.g., 30 d or more), average suspended sediment concentrations should not be increased by more than 5 mg·L⁻¹ over background levels.
 - During high flow periods, anthropogenic activities should not increase suspended sediment concentrations by more than 25 mg·L⁻¹ at any time when background levels are between 25 and 250 mg·L⁻¹. When background levels exceed 250 mg·L⁻¹, suspended sediment concentrations should not be increased by more than 10% of the measured background level at any one time (Singleton 1985; CCREM 1987).
- Run off from the Tote Road will cause changes in the suspended sediment load and monitoring should be undertaken to provide confirmation that CCME guidelines are not being exceeded.

If you have any questions regarding the content of this letter, please contact Paul Harper at our Yellowknife office at 867-444-0983, or by email at Paul.Harper@dfo-mpo.gc.ca. Please refer to the file number referenced above when corresponding with the Program.

Yours sincerely,



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Arctic Region
Fisheries and Oceans Canada

Cc:
José Audet-Lecouffe, Team Lead – Arctic Region, DFO