Baffinland

To:	Nunavut Water Board
From:	Baffinland Iron Mines Corporation
Title:	**2025 NWB/QIA Annual Report for Operations Intervenor Comments**
Date:	October 1, 2026

2025 NWB QIA ANNUAL REPORT FOR OPERATIONS – INTERVENOR COMMENTS

Please find attached Baffinland's response package to the intervenor comments regarding the 2025 Annual Report for Operations to support the NWB's technical review. The package identifies comments for which additional information will be provided through an established regulatory or reporting process, identifies historical recommendations that Baffinland has previously responded to, or which are superseded, or otherwise considered closed, and provides Baffinland's completed responses for comments Baffinland was able to finalize for the initial submittal prior to the official distribution for the annual report.

Baffinland recognizes the essential role the QIA plays in safeguarding Inuit rights and interests in relation to the Mary River Project, in addition to the important regulatory oversight roles of the NWB and CIRNAC. Baffinland remains committed to providing clear, substantive, and timely information in support of those roles.

Challenges continue to persist from QIA comments raised and substantively addressed in previous annual report reviews, during the NWB Water Licence renewal process, or through other regulatory forums such as information requests or the 2025 NIRB Annual Report review. Several of the current comments also:

- Extend beyond the reporting requirements under Schedule B of Water Licence 2AM-MRY2540 or the specific requirements established under section 6.4 of the Commercial Lease;
- Repeat matters being addressed through another regulatory process or an existing recommendation, plan, monitoring program, inspection process, or reporting mechanism;
- Reflect assumptions that, in Baffinland's view, do not account for the operational and environmental conditions of an Arctic mining operation; and/or
- Rely on inspection observations that were not discussed with Baffinland while inspectors were onsite, limiting the opportunity for contemporaneous clarification.

This duplication of process creates an significant administrative burden for Baffinland.

Baffinland also completed a detailed reconciliation of the historical annual-report recommendations identified by CIRNAC in its 2025 review. The reconciliation demonstrates that the thirteen (13) historical recommendations received a substantive response through Baffinland's previous submissions or the 2025 Annual Report and its supporting appendices. In particular, the reconciliation identifies instances where:

- Previous responses were not reflected in CIRNAC's current assessment;

- Response status has been conflated with implementation status;
- Historical matters duplicate current recommendations addressing the same subject; and
- Current recommendation cross-references appear to be incorrect.

Baffinland therefore requests that historical recommendations be closed where a substantive response has been provided, with any remaining implementation activities or prospective reporting improvements tracked through the applicable current recommendation, management plan, monitoring program, or annual reporting process. The continued presence of an item in a historical tracking table should not be asserted to represent continued lack of progress or ongoing non-compliance, but rather a difference of opinion on which requirements fall within the reporting requirements of Schedule B of Water Licence 2AM-MRY2540.

Baffinland's attached response package:

1. Provides Baffinland's responses to comments for which completed responses have been finalized for this initial submittal; and
2. Identifies comments that have been previously addressed, have been superseded by current recommendations, are duplicate matters being tracked through other regulatory processes, or which fall outside the defined scope of the Annual Report review.

Consistent with concerns identified during the review of the 2024 and 2025 Annual Report, Baffinland respectfully requests that the Board:

- Confirm the appropriate disposition of QIA comments that have been substantively addressed. These comments (GGC#1-GGC#4, GGC#7, GGC#8, TE#1, TE#3, AE#5, AE#10, AE#46) are described in Table 4.

- Recognize the distinction between completion of a response and completion of the underlying activity. Where Baffinland has provided a substantive response but associated technical, construction, monitoring, or planning work remains underway, the historical response item should be closed. The remaining work should be tracked through the applicable mechanism (e.g. management plan, monitoring program, inspection process).

- Encourage reviewer issues to be addressed through inspection or audit processes or via established fora, rather than being requested or duplicated through the NWB Annual Report review mechanism, which can fall outside the reporting scope.

- Encourage item-specific closure criteria for recommendations carried forward (within explicit Schedule B reporting requirements) as outstanding that identify: the information considered missing, the reason a previous response is considered insufficient, the applicable Water Licence requirement, and the objective deliverable for closure. Where a historical matter has been carried forward into a current recommendation, the historical item should be closed to avoid duplication and permit a clear pathway to final disposition.

This approach would help ensure that the Annual Report review remains efficient, focused, transparent, and collaborative, while preserving appropriate regulatory oversight and clear accountability for

outstanding work. Baffinland appreciates the Board's consideration and remains committed to responsible operations and constructive engagement with the Board, QIA, CIRNAC, and other intervenors.

Sincerely,

William Bowden

William Bowden | Manager, Environment

Cc: Karén Kharatyan, Robert Hunter, Richard Dwyer (NWB)

Attachments:

Attachment 1: Table 1, 2, 3: BIM Responses & Status of Comments on Baffinland's 2025 QIA-NWB Annual Report for Operations
Attachment 2: Table 4: 2025 Annual Report QIA Comments No Response Justification
Attachment 3: Detailed Reconciliation of Historical CIRNAC Annual Report Recommendations identified in 2025 CIRNAC R-01
Attachment 4: Detailed Response and Status Reconciliation for CIRNAC Recommendation R-13
Attachment 5: Review of the Dustfall Monitoring Program

Attachment 1:
Table 1, 2, 3: BIM Responses & Status of Comments on Baffinland's 2025 QIA-NWB Annual Report for Operations

Table 1: BIM Responses & Status of QIA Comments on Baffinland's 2025 QIA-NWB Annual Report for Operations

No.	Intervener Comment No.	Intervener Comment	Intervener Recommendation	Baffinland's Response
General & Geotechnical Comments (GGC)				
1	GGC#1	There are several recommendations made within the Appendix. While BIM has addressed each of the recommendations, very little detail has been included in terms of dates of previous or planned repairs and maintenance. **References:** **Document Name:** Appendix C.2 – Mary River Project Geotechnical Inspection Report **Section**: 2025 Geotechnical Inspection Recommendations and Implementation Plan **Pages**: 2-8	Please provide available documentation, photographs of proposed and applicable repairs discussed within Appendix C.2, as well as estimated timing of referenced routine maintenance.	This comment extends beyond the scope of annual reporting requirements under Schedule B of the Water Licence and Section 6.4 of the Commercial Lease Agreement. Please refer to the attached Table 4 for more details.
2	GGC#2	The annual WRF geotechnical inspection report is not included within the Annual report.	Please provide the 2025 WRF Geotechnical Inspection Report.	This comment extends beyond the scope of the annual reporting requirements under Schedule B of the Water Licence and Section 6.4 of the Commercial Lease Agreement. Please refer to the attached Table 4 for more details.
3	GGC#3	The most recent slope stability modelling of the WRF indicates an internal friction angle of 40 degrees was assumed for the waste rock which is stated to be 'conservative'. It is unclear if this strength is based on literature review or on site specific lab testing. **References** **Document Name**: Appendix E.8.2 Baffinland Response to QIA 2025 Environmental Audit **Section**: Attachment 1, Table 1. **Pages**: 1	Provide documentation of the lab testing data or literature which supports the material characteristics used in the stability assessment. To better understand risks associated with potential variations in materials, it is recommended sensitivity analyses be completed at lower strengths to verify that minimum recommended Factors of Safety are met.	This comment extends beyond the scope of annual reporting requirements under Schedule B of the Water Licence and Section 6.4 of the Commercial Lease Agreement. In addition, this comment is a repetition of comments in other regulatory fora, and as such, Baffinland considers this comment complete for the purposes of this report. Please refer to the attached Table 4 for more details.
4	GGC#4	Several repairs to the Tote Road are planned for the 2025 season, however, repair plans and schedule are not provided. **References** **Document Name**: Appendix C3 Tote Road Report **Section**: Table C.3.1 **Pages**: 1-2	Please provide an outline of the recommended repairs outlined in Appendix C.3 which are to be completed for each planned repair and a high-level schedule of when they will occur.	This comment extends beyond the scope of annual reporting requirements under Schedule B of the Water Licence and Section 6.4 of the Commercial Lease Agreement. In addition, this comment is a repetition of comments in other regulatory fora, and as such, Baffinland considers this comment complete for the purposes of this report. Please refer to the attached Table 4 for more details.
5	GGC#5	References are made in both tables to success criteria for borrow reclamation regarding "stable side slopes", however, no target maximum slope angle/grade is discussed throughout the document. **References**	Provide maximum slope angle/grade targets for borrow reclamation and supporting evidence for its justification.	The typical remediation target for the borrow reclamation was a 2:1 slope, which is a standard reclamation slope for borrow pit sources. Each site was regraded to restore natural drainage, stabilize landforms, and minimize long-term erosion potential. Post-reclamation inspections and drone surveys will be conducted to confirm long-term stability and drainage performance. Subject to successful verification, the reclaimed sites will be considered fully closed, representing

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		Document Name: Appendix C.1.6 – Borrow Pit Reclamation Report **Section**: Table 2 and Table 3 **Pages:** 4 and 5		an important step toward progressive reclamation and environmental stewardship at the Mary River Project.
6	GGC#6	Monitoring is occurring at both the landfill and hazardous waste area; however, no monitoring is occurring in the area surrounding the WRF where poor water quality has been observed in the past. **References** **Document Name**: Appendix E.11 2025 Groundwater Monitoring Report **Section**: Background and Site Description **Pages**: 1	Provide justification for lack of monitoring in the WRF area and/or implement groundwater monitoring in the area.	At the Mary River Project, hydrogeological conditions are strongly controlled by continuous permafrost. Seasonal sub-surface flow is generally limited to the shallow active layer, which typically reaches a maximum depth of approximately three metres and remains frozen for most of the year. Below the active layer, the underlying permafrost forms a low-permeability barrier that substantially limits deeper groundwater flow pathways. As a result, the most relevant potential seepage pathway is shallow seasonal active-layer flow, rather than migration through a persistent deep groundwater system. For this reason, Baffinland considers existing seepage, surface water, and receiving environment monitoring programs the most appropriate tools for detecting and assessing potential seepage. Any shallow active-layer seepage that develops during thaw would be expected to report locally to the ground surface or nearby drainage features, where it can be identified through routine visual inspections, seepage observations, water level observations, and water quality monitoring conducted under the Surveillance Network Program (SNP), Waste Rock Management Plan Quality Assurance/Quality Control (WRMP QA/QC) Program, and the Core Receiving Environment Monitoring Program (CREMP). These programs are therefore considered to provide the most practical and site-appropriate means of assessing seepage under northern permafrost conditions. With respect to the Waste Rock Facility (WRF) specifically, previous investigations have not identified a persistent saturated groundwater zone suitable for a conventional groundwater monitoring well network in that area. In addition, following implementation of the four-metre non-acid generating (NAG) waste rock cap, over 85% of the facility instrumentation has confirmed that frozen conditions are maintained year-round within the facility profile and remain well above the original ground surface. In addition to supporting potentially-acid generating (PAG) rock management, this substantially limits the potential for waste rock contact water or other associated constituents to migrate into the seasonal active layer or to support sustained subsurface seepage migration. Monitoring to date has indicated that total suspended solids (TSS) has been the principal seepage-related parameter of interest, while pH has not been a concern in recent years and metals have never exceeded discharge criteria. This is consistent with the effectiveness of current waste placement and mitigation measures within the WRF, including the four-metre NAG waste rock cap, which supports both PAG control and maintenance of frozen conditions within the facility profile.

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				Accordingly, Baffinland does not consider broad expansion of a conventional groundwater monitoring well network across the site to be technically warranted or likely to provide more meaningful information than the seepage, thermistor, and receiving environment monitoring lines of evidence already in place. It is important to note that baseline data does not exist for groundwater at the Project, which makes interpreting the data difficult for potential contaminants of concern. However, Baffinland will continue to evaluate whether targeted active-layer seepage investigations or other site-appropriate monitoring methods are warranted in specific areas where observations indicate a credible potential for subsurface seepage. To that end, Knight Piésold Ltd., *Mary River Project, Groundwater Monitoring Program Review and Assessment*, dated March 28, 2023, documents a risk-based assessment of 18 facilities at the Mine Site. The risk-based assessment consisted of the scoring of weighted screening criteria including: source material aquatic toxicity, soil toxicity, proximity to receptors, secondary containment, contaminant mobility, and hydraulic gradient. The Mine Site Non-Hazardous Waste Landfill Facility and the Mine Site Hazardous Waste Berm Facility were prioritised and no recommended expansion of the groundwater monitoring program to include additional facilities was made, unless conditions changed such that a facility's risk score changed to 'high' risk. **Baffinland considers this item (GGC#6) closed.**
7	GGC#7	There was an unprecedented rainfall event on Sept. 20, 2024 which was classified as exceeding the 1:1000 year 24-hour rainfall event. In response, CIRNAC requested an overall review of the site climatic database, and re-evaluation of hydrology design criteria, surface water management infrastructure, and dykes, dams and related earthworks. Baffinland responded in part that "notwithstanding localized damage to two portions of the Tote Road, the broader performance of ponds and related surface water management infrastructure…provides evidence that the existing design approach was generally robust and incorporated sufficient conservatism to perform well beyond the nominal design event at many locations" (p. 12). It is not clear what level of storm event the water management infrastructure is engineered for on site (i.e., for what return period). **References** **Document Name**: Appendix E.13.1 – Responses to Intervenor Comments on the 2024 QIA-NWB Annual Report for Operations **Section**: Comment No. 8 GGC#8 and CIRNAC No. R-23 Rainfall/Climate Change **Page**: 12	Baffinland should clarify the return period of storm event that water management infrastructure is engineered for on the project site.	This comment extends beyond the scope of annual reporting requirements under Schedule B of the Water Licence and Section 6.4 of the Commercial Lease Agreement. Please refer to the attached Table 4 for more details.

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8	GGC#8	QIA previously expressed concern that identification of suitable spawning habitat will not be obtained well in advance of water withdrawal, potentially impacting spawning habitat and/or the identification of alternative withdrawal locations. QIA recommended that a spawning habitat assessment be conducted to identify suitable habitat as a baseline (e.g., mapped during the preceding summer and confirmed just prior to the commencement of water withdrawal). In response, Baffinland committed to providing "aquatic habitat information collected at the proposed water intake sites" and would submit these to the NWB "at least sixty days prior to construction" (p. 2 of 11). QIA is concerned that submission of this information 60 days prior to construction may not be sufficient time for the NWB and QIA to review and comment, and for Baffinland to find alternative sites if spawning habitat is identified. **References** **Document Name**: Appendix E.13.2 Public Hearing Commitments Progress Summary Table **Section**: WL Renewal Commitment #11, Recommendation # QIA-TR-10 **Page**: 2 of 11	Baffinland should conduct spawning habitat assessments during the preceding summer to any planned water withdrawals so that there is sufficient time for NWB/QIA to review and comment, and for potential re-location of sites if necessary.	This comment extends beyond the scope of annual reporting requirements under Schedule B of the Water Licence and Section 6.4 of the Commercial Lease Agreement. In addition, this comment repeats comments made in other regulatory forums; as such, Baffinland considers it complete for the purposes of this report. Please refer to the attached Table 4 for more details.
9	GGC#9	Baffinland conducted a hydrology baseline analysis for the Mary River Project in 2012, using data from 16 hydrometric stations. Since then, Baffinland has continued monitoring only seven of the 16 original hydrometric stations. QIA previously recommended that the remaining nine original stations be reactivated to continue to provide recent baseline information given that construction is delayed. Baffinland responded that it reactivated four of the stations along the Steensby Railway corridor in summer 2025. It is not clear why the other five suspended stations have not been reactivated. **References** **Document Name**: Appendix E.13.2 Public Hearing Commitments Progress Summary Table **Section**: WL Renewal Commitment #35, Recommendation # QIA-TR-7 **Page**: 8 of 11	Baffinland should reactivate the five remaining stations to continue to provide baseline hydrological information or provide a rationale as to why they are choosing not to reactive them.	As noted in *Water Licence No: 2AM-MRY2540, Reasons for Decision Including Record of Proceedings*: The following commitments were agreed upon by Baffinland and QIA during the public hearing as a result of their discussions on unresolved comments/concerns: *"Commitment 35 in response to concern and/or recommendation by QIA (QIA-TR-7): Baffinland is planning to reactivate the four hydrometric monitoring stations (BR11, BR25, BR96-2 and BR137) along the Steensby Railway corridor in 2025 to supplement existing baseline data collected for the 2012 FEIS. These stations will measure streamflow and help characterize natural variation in hydrological conditions. If the supplemental baseline data deviates by more than 2 standard deviations from the original baseline, Baffinland will engage with QIA to review the findings and collaboratively develop appropriate updates to the construction monitoring programs, if required, to ensure potential environmental changes are effectively captured and addressed. This will be submitted in the form of a Construction Report prior to Steensby construction."* Five of the hydrometric stations described in the baseline report were decommissioned. The rationale for not including them under Commitment 35 is as follows: • H03: Located on a tributary of the Tom River, approximately 5 km north of the Mary River Mine Site. H02, located on the Tom River, at the outlet to Camp Lake, is downstream of H03 and is actively monitored as part of the Aquatic Effects Monitoring Program (AEMP). The 2012 Final Environmental Impact Assessment (FEIS) predicted negligible changes in water

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				quantity due to diversions and discharges for the MR-07 sub-watershed (reporting to H03) and the Tom River (reporting to H02). H03 was decommissioned following the 2010 season. • H08: Located on the upper Mary River, approximately 11 km east of the Mary River Mine Site. H06, located on the Mary River and downstream of H08, is actively monitored as part of the AEMP. H07, located on a tributary of the Mary River, downstream of H08 and upstream of H06, is also actively monitored as part of the AEMP. Flow at H06 is comprised of flow reporting to H07 and H08. H08 was noted as having a poor downstream control and difficult conditions for reliably monitoring representative flow conditions. Additionally, the 2012 FEIS predicted negligible changes in water quantity due to diversions and discharges for the upper watershed of the Mary River (reporting to H08). H08 was decommissioned following the 2008 season. • H09: Located at the outlet of a small lake approximately 70 km south of the Mary River Mine Site. Project activities and infrastructure, including those proposed, are not within the watershed and the watershed is not expected to experience measurable changes to water quantity. The H09 was decommissioned following the 2008 season. • H10: Located approximately 4 km southeast of the Mary River Mine Site, at the outlet of Sheardown Lake to the Mary River, the hydrometric station is often backwatered by flow from the Mary River during increased water levels in the Mary River. Due to the backwatering, adequate stage-discharge measurements were not completed during baseline, and the hydrometric station was used to collect stage measurements instead prior to being discontinued. H10 was decommissioned following the 2008 season. • H12: Located at 3KM Lake, near the proposed Steensby Port. The hydrometric station was used to collect water level measurements for one year (2011) during baseline monitoring as the outlet of the lake was too shallow and complex to measure flow. As 3KM Lake was proposed for camp and construction water-taking during the first year of construction, the residual effects and reversibility were ultimately deemed 'not significant'. H12 was decommissioned following the 2011 season. Baffinland is of the opinion that monitoring at the five suspended hydrometric stations provides no valuable measurement of potential Project-related effects, specifically in relation to the Steensby Railway corridor. Baffinland continues to collect data from other stations in the Steensby watershed as agreed upon with QIA in the water licence hearings. **Baffinland considers this item (GGC#9) closed.**
Terrestrial Environment (TE)				

No.	Intervener Comment No.	Intervener Comment	Intervener Recommendation	Baffinland's Response
10	TE#1	For borrow pits 14, 14A, 41, and 71 Baffinland notes that "To verify reclamation success and compliance with closure objectives, the borrow pit will be inspected in 2026, and a drone survey will be conducted to assess whether any significant settlement has occurred." (p. 3). Baffinland does not provide further details of the inspection or drone survey methods, and as a result QIA cannot assess whether these surveys will be sufficient to verify reclamation success and compliance with closure objectives. **Document Name**: 2025 Qikiqtani Inuit Association and Nunavut Water Board Annual Report for Operations; Appendix C.1.6 2025 Borrow Pit Reclamation Report **Section**: 3.3, 4.3, and 5.3 **Page**: 3, 5, and 7	QIA requests that Baffinland provide the following details for the inspection and drone surveys: • Metrics that will be collected as part of the surveys • Spatial extent of the surveys • Date and time of the surveys • Qualifications of staff undertaking the surveys	This comment extends beyond the scope of annual reporting requirements under Schedule B of the Water Licence and Section 6.4 of the Commercial Lease Agreement. Please refer to the attached Table 4 for more details.
11	TE#2	In section 9.7, Baffinland has indicated that reclamation studies will be provided in the NIRB annual report. As QIA has not had a chance to review these reports at this time, we are unable to confirm whether there are any technical concerns present as they relate to the NWB process. **References** **Document Name**: 2025 Qikiqtani Inuit Association and Nunavut Water Board Annual Report for Operations **Section**: 9.7 **Page**: 62	QIA may provide further comments on the reclamation research work completed by Baffinland pending review of the forthcoming 2025 Terrestrial Environment Annual Monitoring Report (TEAMR).	No response required (information only). Also note the Terrestrial Environment Annual Monitoring Report (TEAMR) is a NIRB annual report appendix.
12	TE#3	It is noted throughout the QIA Inspection Reports that dust generation continues to be a problem in the project area. For example: "*dust was observed blowing from the mine haul road to the point where it was difficult to see the road in front of the light duty truck*" Section 3.1 Waste Rock Facility (p. 4) "*as with other project areas there was noticeable dust deposition on the tundra beside the spillway and the slope leading down towards Mary River*" Section 3.3 KM106 (p. 5). Inspectors observed that where calcium chloride is applied there is a reduction in dust, however, it does not appear to be consistently applied in all project areas. In particular, inspectors noted that calcium chloride was applied unevenly along the Tote Road, focused around the Sailiivik Camp and Milne Port, but not in the middle section where more dust was observed. Baffinland responded that dust suppression is a priority and as such it has increased the number of water trucks available and "intends to continue applying calcium chloride as the primary dust suppression agent where appropriate" Attachment 1 – Baffinland Responses (p. 123 of 127).	Baffinland should explain what steps will be taken to improve dust suppression throughout the project area. In particular, Baffinland should demonstrate how more thorough and consistent coverage of the entire Tote Road will be achieved for calcium chloride application so that areas identified as generating large amounts of dust are eliminated.	This comment extends beyond the scope of annual reporting requirements under Schedule B of the Water Licence and Section 6.4 of the Commercial Lease Agreement. In addition, this comment is a repetition of comments in other regulatory fora, and as such, Baffinland considers this comment complete for the purposes of this report. Please refer to the attached Table 4 for more details. Baffinland will provide an update on dust suppression activities in 2026, including along the Tote Road, in the 2026 NIRB annual report.

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		It is not clear from Baffinland's response whether a strategy is in place to address the spatial gaps identified in calcium chloride application throughout the project area. **References** **Document Name**: Appendix E.8.2 QIA Inspection Reports and Responses; QIA 2025 Environmental Audit Report – Oct. 30, 2025; Baffinland Response – March 9, 2026 to 2025 QIA Environmental Inspections **Section**: Section 3.1 Waste Rock Facility, Section 3.3 KM106, Section 4 Tote Road, Attachment 1 – Baffinland Responses to QIA's June & September Environmental Inspection Reports **Page**: 4, 5, 9, 123		
Aquatic Environment (AE)				
13	AE#1	"*Baffinland has taken a conservative approach, applying calcium chloride combined with water to targeted areas along the road to reduce potential calcium chloride interactions with receiving environments." (2025 QIA NWB ARO, s.4.2, p. 23). Less water is required when calcium chloride is applied than when water alone is used for dust suppression* (2025 QIA NWB ARO, App. G.4.1, s. 7.2, p. 48). In 2025, the total amount of calcium chloride applied for dust suppression along Project roadways was reduced by 63%, from 609,000 kilograms (kg) in 2024 (2024 NIRB Annual Report, App. G.5.1, s.7.2, p. 47) to 224,000 kg (BIM 2025 NIRB Ann. Rep., App. G.4.1, s. 7.2, p. 48). The amount of applied per kilometer (km) of roadway was also reduced by 15%, from 1,000 kg to 850 kg. Based on an average road width of 13 meters (m), this equates to calcium chloride applications of 0.077 kg/m2 in 2024 and 0.065 kg/m2 in 2025, about 8.4% and 7.1%, respectively, of the recommended industry standard application rate of 0.917 kg/m2 (= 1.69 lb/yd2). Despite these substantial decreases in calcium chloride use for dust suppression, Baffinland reported: "*Visible and measurable dust (as reported by operators and measured discretely) was lower in 2025 than in previous years*." (2025 QIA NWB ARO, App. G.4.1, s. 7.2, p. 48). This is counterintuitive. In June and September 2025, QIA inspectors noted that "*In locations where calcium chloride was applied there [were] notable declines in dust. However, this was not applied regularly throughout the project area*." (2025 QIA-NWB ARO, App E.8.2, pdf p. 21 and 86 of 127). During those inspections recent rainfall suppressed dust mobilization, and dust mobilization remains a concern. **References** **Document Name**: Baffinland Iron Mines 2025 Annual Report to QIA and NWB for Operations, Main Body [NWB Registry: 260331 - 2025 QIA-NWB Annual Report for Ops - As Sent.pdf],	QIA requests Baffinland: 1) provide its rationales for decreasing the total amount of calcium chloride used for dust suppression and the amount it applies per square meter of road surface, 2) clarify what factors were considered in these decisions, and 3) explain how these changes and factors will be used to refine and improve its dust suppression efforts.	The decrease in total $CaCl_2$ use and per-square-meter application was driven primarily by operational and environmental conditions that limited opportunities for safe and effective application. In 2025, periods of rainfall resulted in sustained roadbed saturation across multiple segments of the Project roadway. $CaCl_2$ cannot be applied to saturated surfaces without increasing the potential for mobilization into adjacent receiving environments. As a result, several planned applications could not proceed. In addition, the transition from wet conditions to freeze-up in September further constrained the available weather window. Effective $CaCl_2$ application requires extended periods of dry, stable conditions, typically 20 consecutive days, to ensure proper binding to the road surface. These conditions did not occur consistently in 2025. Operational variability also contributed to reduced application rates. $CaCl_2$ is applied at specific concentrations tailored to road segment characteristics, including aggregate type and replacement frequency. In 2025, several segments scheduled for treatment were inaccessible during appropriate weather windows, and planned applications could not be safely completed. Despite these constraints, dust levels reported by operators and measured at select monitoring stations were lower in 2025 than in previous years. This outcome reflects both targeted $CaCl_2$ applications where conditions allowed and the suppressive effect of recurring rainfall events.

No.	Intervener Comment No.	Intervener Comment	Intervener Recommendation	Baffinland's Response
		Section: 4.2 Quantities of freshwater used for dust suppression **Page**: 23 (pdf p. 43of 94) **Document Name**: Baffinland Iron Mines 2025 Annual Report to QIA and NWB for Operations, Appendix E.8.2 QIA inspection reports and responses (June 2025 site inspection) [260331 - 2025 QIA-NWB Annual Report for Ops - Appendix E.8.2 QIA Inspection Reports-Responses.pdf] **Section**: Table: LGL Limited - Ecological Review of the Mary River Project, Item 8 **Page**: 19 (pdf p. 21 of 127) **Section**: Table 1 LGL Limited, Item 6 **Page**: 12 (pdf p. 86 of 127) **Document Name**: Baffinland Iron Mines 2024 NIRB Annual Report, Appendix G.5.1 Mary River Project Terrestrial Environment 2024 Annual Monitoring Report [NIRB Registry: 250530-08MN053-2024 Annual Rpt-App G.5.1 TEMP-Pt 1-IMRE.pdf], **Section**: 7.2 Dustfall suppression and mitigation **Page**: 47 (pdf p. 47 of 95) **Document Name**: Baffinland Iron Mines 2025 NIRB Annual Report, Appendix G.4.1 Mary River Project Terrestrial Environment 2025 Annual Monitoring Report [NIRB Registry: 260529-08MN053-2025 Annual Report App G.4.1 TE Annual Monitoring Rpt Pt1-IR2E.pdf], **Section**: 7.2 Dustfall suppression and mitigation **Page**: 48 (pdf p. 75 of 101)		
14	AE#2	The 2025 Annual Report describes the proposed addition of monitoring station MS-12 to Schedule I of the Type 'A' Water Licence to represent a Final Discharge Point (FDP) for clean snowmelt and stormwater from the Mine Pit, driven by anticipated elevated snowmelt volumes in 2026. The rationale provided is explicitly linked to a temporary operational condition (i.e., unusually high snowfall and associated melt in 2026) and the need to manage increased hydraulic loading to existing infrastructure (e.g., MS-08). However, the application requests a permanent addition to the Surveillance Network Program (SNP) to support this discharge pathway. While the Report notes that a permanent station would support ongoing monitoring and adaptive management, it does not clearly justify why a temporary or contingency-based monitoring approach would not be sufficient for a short-term operational scenario. The proposed permanent addition of MS-12 to the SNP is not clearly aligned with the stated temporary operational need. Specifically: • the need for the FDP is described as year-specific (2026); • it is unclear whether similar conditions are expected to recur with sufficient frequency to warrant permanent infrastructure and monitoring; and • the long-term role of MS-12 within the water management system is not clearly defined.	• Clearly distinguish between temporary operational measures and permanent modifications within SNP proposals, including the conditions under which each is warranted. • Provide justification for permanent SNP additions, including demonstration of recurring need, long-term operational integration, and alignment with the water management strategy. • Where infrastructure or monitoring is driven by short-term or contingency conditions (e.g., elevated snowmelt years), consider implementation of conditional or temporary SNP stations, with defined criteria for continuation or decommissioning.	The MS-12 FDP to monitor discharge of clean snowmelt and stormwater collected within the Mine Pit footprint was proposed to be constructed and implemented prior to freshet 2026 in anticipation of increases in snowmelt volumes reporting to MS-08 due to higher than usual snowfall in winter 2025-26. The proposal will segregate clean snowmelt and stormwater collected within the Mine Pit footprint, which is currently pumped to the WRF Pond for discharge via FDP MS-08, for direct discharge via a dedicated pipeline. The FDP was approved by Environment Canada however is not approved through the water licence process to date. There is no mechanism that Baffinland is aware of to approve a temporary SNP monitoring location and as such submitted a SNP modification request to the NWB with the 2025 annual report. While the MS-12 monitoring location is expected to be used only during freshet to mitigate hydraulic load on water being transferred to MS-08, the modification would be a permanent discharge monitoring point that would be controlled through the proposed discharge criteria consistent with other Mine water discharge compliance monitoring IDs. Permitting approvals for MS-12 remained in progress during freshet 2026. A controlled emergency discharge was initiated at MS-08 in June 2026 when snowmelt inflow volumes exceeded the designed discharge capacity of the WRF Pond and discharge system. Completion of the new 570 Sump FDP for direct discharge of suitable Mine Pit snowmelt and stormwater will improve future water management capacity and will mitigate the potential for further overflows. In Summary:

No.	Intervener Comment No.	Intervener Comment	Intervener Recommendation	Baffinland's Response
		This creates uncertainty regarding whether the modification represents a temporary adaptive measure or a long-term change to water management and discharge pathways. Without clear justification, there is limited transparency on how this modification aligns with the intent of the SNP and the broader water management framework. **References** **Document Name**: 2025 QIA-NWB Annual Report for Ops **Section**: 7 Monitoring **Page**: 55 of 94	• Define the long-term role of MS-12 within the site water management system, including how it will be used outside of high snowmelt conditions and how it integrates with existing FDPs and treatment infrastructure.	• A permanent SNP monitoring location ID is required to discharge from the MS-12 FDP compliance point. • The MS-12 FDP is planned to be a permanent monitoring location to improve future water management capacity. • MS-12 is primarily planned to be used during snowmelt conditions.
15	AE#3	The Annual Report states that stormwater from the Milne Port Landfarm Facility (MP-04) was discharged between August 14 and August 26, 2025, and that sampling and analysis were conducted in accordance with Schedule I of the Type 'A' Water Licence, with results demonstrating suitability for discharge. The report further indicates that supporting data are provided in the tables document. However, the corresponding table referenced for review (Table 7.2.4) is not included in the Tables document. Instead, Table 7.2.5 (Water Quality Results for monitoring location MP-06) appears to be duplicated. As a result, the water quality data required to evaluate compliance and support the conclusions regarding MP-04 stormwater discharge are not available for review. The omission of the referenced table and duplication of an unrelated table results in an incomplete record of monitoring data. This limits the ability to: • verify that discharge criteria were met; • assess compliance with Water Licence conditions; and • evaluate the quality and representativeness of stormwater discharge from MP-04. **References** **Document Name**: 2025 QIA-NWB Annual Report for Ops **Section**: 7.2 Stormwater from Containment Areas **Page**: 57 of 94	Provide the missing Table 7.2.4 and ensure that all referenced tables and supporting datasets are included and correctly labeled in submitted reports.	Baffinland apologizes for the confusion but confirms that Table 7.2.4 was included in the submission package. It was placed out of sequence (following Table 7.2.2 rather than after Table 7.2.3), which may have contributed to it being overlooked during review.
16	AE#4	The Annual Report indicates that verification monitoring was conducted at stations MS-MRY-13A and MS-MRY-13B downstream of the Landfill Facility in 2025 to support operational decision-making and adaptive management and concludes that no adaptive management responses were required. Sampling at MS-MRY-13A is also described as occurring throughout the open-water season, with flow monitoring data provided in an appendix.	• Provide complete water quality datasets for all verification monitoring stations (including MS-MRY-13A and MS-MRY-13B) within the Annual Report tables to support conclusions regarding downstream conditions and adaptive management.	Schedule I of the Type 'A' Water Licence 2AM-MRY2540 (NWB, 2025) distinguishes surface water monitoring stations downstream of Project infrastructure as Verification Monitoring Program locations. As per Schedule I, monitoring parameters and locations under the Verification Monitoring Program are internal to Baffinland, and the program is to be carried out to provide water quality data for operational and management purposes and to inform and support adaptive management measures, where necessary.

No.	Intervener Comment No.	Intervener Comment	Intervener Recommendation	Baffinland's Response
		However, the Tables document does not include water quality results for MS-MRY-13A or MS-MRY-13B. While flow data for MS-MRY-13A are referenced, the absence of corresponding water quality data precludes verification of the conclusions presented in the report regarding downstream conditions and the determination that no adaptive management was required. The omission of water quality results for verification monitoring stations MS-MRY-13A and MS-MRY-13B limits the ability to: • confirm the conclusion that no adaptive management responses were warranted; • evaluate potential influences of the Landfill Facility on downstream drainage; and • assess compliance with Water Licence monitoring and reporting expectations. Verification monitoring locations are specifically intended to inform management and validate performance of mitigation measures; therefore, the absence of supporting data reduces transparency and confidence in the interpretation presented in the Annual Report. **References** **Document Name**: 2025 QIA-NWB Annual Report for Ops **Section**: 7.3.2 Mine Site Landfill Facility **Page**: 59 of 94	• Ensure that all monitoring locations described in the narrative text are consistently supported by corresponding tabulated results in submitted documentation.	As such, and consistent with other internal monitoring for operational purposes, internal verification monitoring results will not be reported externally in the annual report. However, Baffinland will continue to provide updates on facility performance and any adaptive management in the annual report to ensure Baffinland's regulatory stakeholders are kept informed of any important updates. Baffinland will continue to report on all Regulated Monitoring locations in Table 12 and 13 of Schedule I of the Type 'A' Water Licence 2AM-MRY2540 (NWB, 2025)
17	AE#5	The Annual Report indicates that 328 water quality samples were collected under the TRMP in 2025 and concludes that no Project-related impacts were identified. Supporting data are presented in Table 7.4 (Tables 7.4.1 to 7.4.40). Review of the Tables document indicates that upstream and downstream monitoring results for individual crossings are presented in separate tables rather than side-by-side. This structure reduces the ability to directly compare conditions upstream and downstream for the same monitoring event. The current presentation format limits the transparency and interpretability of the dataset. Specifically: • upstream and downstream comparisons require cross-referencing between multiple tables; • it is difficult to efficiently assess spatial changes across crossings; and • the ability to identify potential Project-related effects or exceedances is reduced.	• Revise TRMP data presentation to align upstream and downstream results within a single table or directly adjacent columns for each station pair and sampling event. • Include paired comparisons (e.g., upstream vs downstream) by date, with calculated differences or ratios where appropriate, to support rapid identification of potential effects. • Ensure future reporting structures are designed to directly support the objectives of effects assessment and alignment with the AEMP/TARP framework.	Bullet 1: Baffinland will revise TRMP data presentation as requested in future annual reports to ensure clear comparison between upstream and downstream conditions and improve dataset interpretability. Bullet 2: Baffinland notes this extends beyond the Roads Management Plan & SWAEMP requirement for data documentation and reporting. The data with guidance parameters within the SWAEMP is solely TSS which is readily apparent should it differ between guidelines within the upstream and downstream data. In addition Baffinland highlights data that exceeds the guidelines. Bullet 3: This comment extends beyond the scope of annual reporting requirements under Schedule B of the Water Licence and Section 6.4 of the Commercial Lease Agreement. Please refer to the attached Table 4 for more details.

No.	Intervener Comment No.	Intervener Comment	Intervener Recommendation	Baffinland's Response
		Given that the TRMP is intended to assess potential effects of road operations on receiving waters, clear and direct comparison between upstream (reference) and downstream conditions is a fundamental component of effects assessment. **References** **Document Name**: 2025 QIA-NWB Annual Report for Ops **Section**: 7.3.8 Tote Road Monitoring Program **Page**: 66 of 94		
18	AE#6	Baffinland reports that five duplicate samples had RPD > 20% and greater than 10 times the LDL. Four of these exceedances occurred at the same monitoring station (MP-01), one in January and the rest on the same date in November. Potential reasons for these exceedances are not discussed. **References** **Document Name**: 2025 QIA-NWB Annual Report **Section**: Section 7.8 Quality Assurance and Quality Control (QA/QC) **Page**: 54	Baffinland should discuss reasons for the exceedances between parent sample pairs and field duplicates documented in 2025, and how this affects water quality results and interpretation.	The reasons for the RPD exceedances were described in the same section referenced by the reviewer (Section 7.8) of the annual report (page 55). The response was as follows: As part of the QA/QC data analysis process, the number of flagged analytes to the total number of analyzed parameters is used to evaluate analytical precision. For the duplicate samples, all of the sampling events that had RPD exceedances were at the waste treatment facilities. Sampling at these facilities is different than collecting surface water samples where the parent sample and its duplicate can be sampled in tandem. Samples at the waste treatment facilities are taken from a spigot, and samples cannot be sampled in tandem which may result in a fluctuation of differences between the parent and duplicate analytes and can lead to RPD exceedances. Analysis of the samples with the RPD exceedances determined that analyte concentrations were sufficiently low as to not affect interpretation of the data or have an impact on the environment.
19	AE#7	Baffinland states that for trip and field blanks "*concentrations should be nondetectable, with a DQO of within five (5) times the respective laboratory lowest reportable detection limit for that parameter. If sample results are less than or equal to five (5) times the respective external laboratory's lowest detection limit (LDL) for that parameter, it is considered that such small differences account for generic noise around the limit. If sample results are five (5) times greater than the respective external laboratory's LDL for that parameter, the detected concentration is considered significant and any atmospheric and/or sample handling influences should be investigated*". We note that CCME guidance[1] is that < 5% of blanks with values > LDL is considered acceptable. Baffinland recorded 2 out of 33 total trip blank analyte results above the trip blank DQO of < LDL (6% of blanks) and 3 out of 41 individual field blank results above the DQO of < LDL (7% of blanks). There is no discussion of potential causes of the observed contamination of trip and field blanks. One trip blank sample exceeded the 5 times > LDL for total ammonia (as N) at MP-01B in 2025. However, Baffinland concluded "*that there was negligible contamination, and that field precision and accuracy were considered acceptable*".	Baffinland should investigate and discuss possible causes of the trip blank and field blank exceedances of DQOs of < LDL. In the case of the exceedance of the 5x LDL for the trip blank sample at MP-01B, Baffinland should demonstrate how this contamination may have affected water quality results. In future, Baffinland should commit to immediately responding to any breach of the 5x LDL limit in trip or field blanks through corrective action to ensure that contamination does not represent a widespread systemic issue and that data is still valid.	The reasons for the blank exceedances were described in the same section (Section 7.8) of the annual report (page 55). The response was as follows: For the field and trip blanks, only one (1) analyte of all blank results exceeded the 5xLDL criteria for deeming significant enough to investigate. Results of the one (1) analyte exceedance were compared to the parent sample that the blank was taken with and were determined not to have been influenced or impacted in the same way that the field blanks were. The results of the main monitoring samples remained consistent when compared with a few years' worth of data for that sampling location, and no outliers or anomalous data were detected. Baffinland also stated that it has continued to increase training and awareness for all staff that are involved in making trip and field blanks to ensure no sample contamination. Going further, Baffinland commits to investigating each DQO and RPD exceedance to determine why the exceedance may have occurred and to ensure that the data is still valid.

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		It is not clear why this breach of the 5x LDL limit in an unsealed trip blank was not considered significant, warranting an immediate investigation into a potential systemic contamination issue. Any number of trip blanks exceeding both the DQO and the 5x LDL should be considered significant and should require immediate corrective action. When this QA/QC threshold is breached, analysis should be paused, associated samples should be flagged, an investigation into the root cause should be undertaken, and new samples should be collected if the data is determined to be compromised. **References** **Document Name**: 2025 QIA-NWB Annual Report **Section**: Section 7.8 Quality Assurance and Quality Control (QA/QC) **Page**: 55		
20	AE#8	BIM notes that "*the data logger at MQ-C-B began to produce erroneous data in early August and no data were usable after August 4*." The rationale for not repairing or replacing the pressure transducer during the monitoring period is unclear. This has resulted in a data gap for the remainder of the season. **References** **Document Name**: Appendix E.3 2025 Surveillance Network Program Hydrometric Monitoring Report **Section**: 2. Methods and Data Collection **Page**: 3 of 15	Please explain why the pressure transducer was not repaired or replaced when issues were first identified, and confirm whether it will be repaired or replaced in advance of the 2026 field season to ensure continuous data collection.	The pressure transducer at MQ-C-B was checked during each site visit (July 12, August 3, 17, and September 9) and appeared to be functioning normally, providing consistent water-level readings and stable offsets between logger data and manual benchmarks for most of the season. After the final download in September, however, the offset differed significantly from earlier values, and a detailed review of the full dataset, along with comparison to adjacent stations, showed that the logger began drifting in early August, followed by an abrupt shift in late August and early September. Because the timing and magnitude of these shifts were inconsistent, the drift could not be reliably quantified, and the data collected after August 4 was deemed unreliable for flow estimation. The transducer was not replaced in August because it appeared to be functioning properly during site visits, and the random shifts only became evident after the final download and cross-station comparison. Following the open water season, the logger was flagged and sent for repair and recalibration prior to its deployment in 2026.
21	AE#9	BIM notes that predicted effects within the SDLT-1 catchment include a net mean annual discharge reduction of 5%, with localized decreases (up to 26%) and increases (up to 31%) in flow associated with diversions and effluent discharge. However, monitoring results at station H11 indicate increasing trends in mean monthly flows for July and August (200% and 275% increases, respectively), which exceed the magnitude of predicted changes. While not all recent trends (2019–2025) are statistically significant, the magnitude and direction of change at H11, along with the acknowledged increase in catchment size due to the Mine Haul Road diversion, suggest that site-specific effects at H11 may not be fully captured by the original predictions. As such, the statement that changes are "largely driven by natural variability" and remain within predicted effects does not appear to fully apply to this station.	Clarify how the observed increases in flow at station H11, particularly those exceeding predicted magnitudes, align with the original impact predictions. In addition, outline any proposed monitoring, reassessment, or mitigation measures to address the apparent discrepancy between predicted and observed flow conditions at H11.	Baffinland would like to highlight, with reference to Knight Piésold Ltd., Hydrology Assessment - Effects of Proposed Mine Site Water Management Measures on Flows in Sheardown Lake Tributary 1 - Mary River Project, dated June 24, 2021, that the diversion related to the Mine Infrastructure Area (quantified as a -26% change to baseline flows at H11) was never implemented and that the resulting changes at H11 are quantified at -10% (resulting from the Open Pit diversion) and +31% (resulting from the Mine Haul Road diversion) from baseline flows, resulting in a net increase of 21%, as opposed to a net decrease of 5%. Baffinland apologizes for this error and will correct it in future AEMP hydrometric monitoring reports. Furthermore, the observed increase in flow of 200% for July and 275% for August is the relative change from 2011 to 2025 and not a comparison of current conditions to the entire baseline period prior to diversion implementation (2011-2018). Notably, 2011 was a drier-than-average

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		References **Document Name**: Appendix E.9.1 2025 Aquatic Effects Monitoring Program Hydrometric Monitoring Report **Section**: 5.6 SDLT-1 Catchments (H11) **Page**: page 14 of 34		year, and 2025 was a wetter-than-average year, which accentuates the relative percent difference between the two. Comparison of baseline (2011-2018) to post-diversion (2019-2025) periods indicates a 29.6% increase relative to baseline in July and a 22% increase relative to baseline in August, consistent with the corrected predictions listed above. Future hydrometric monitoring reports will report relative differences using the entire available baseline period as a reference.
22	AE#10	In its response to QIA's 2024 comments on the 2024 QIA-NWB Annual Report on Operations, Baffinland objected to QIA supporting "*recommendations for additional hydrometric site visits throughout future seasons to verify the operation of data loggers and perform flow measurements, and continued targeting of low flow and/or high flow periods--particularly extreme peak flow, to maintain and further validate the rating relationships*." (BIM 2024 Response Attachment 5, QIA AE#17, p.53 of 77) The recommendations supported were to Baffinland from its hydrometric advisor, North Water Consultants. They read: "*Additional site visits are recommended throughout future seasons to verify the operation of data loggers and perform flow measurements. It is recommended that future hydrometric monitoring continue to target low flow and/or high flow periods to maintain and further validate the rating relationships*." (2024 QIA-NWB ARO, Appendix E.9.3, s.6, p. 8). As Baffinland noted in its comments (Attachment 5, p. 53 of 77), QIA had already commented on the hydrometric monitoring in its reviews of the 2022 and 2023 annual reports to QIA-NWB. As QIA noted when supporting the North Water recommendations, monitoring of stream flow through the open water season is important for understanding Arctic char access to and from juvenile summering habitats upstream of the Tote Road crossings, and to inform the design of culvert stream crossings. In its 2025 report to Baffinland, North Water Consultants (2025) repeated the recommendations underlined above (2025 QIA-NWB ARO, Appendix E.9.1, s.6, p. 13). QIA continues to support those recommendations. **References** **Document Name**: Baffinland Iron Mines 2025 Annual Report to QIA and NWB on Operations, Appendix E.9.1- 2025 AEMP Hydrometric [NWB Registry: 260331 – 2025 QIA-NWB Annual Report for Ops - Appendix E.9.1 - 2025 AEMP Hydrometric Report.pdf] **Section**: 6 Summary and recommendations **Page**: 13 (pdf. 16 of 34). **Document Name**: Baffinland Iron Mines 2024 Annual Report to QIA and NWB on Operations, Appendix E.9.3 AEMP Hydrometric [NWB Registry: 250331 - 2024 QIANWB Annual Report for Ops - Appendix E.9.3 (AEMP Hydrometri.pdf]	QIA supports the recommendations for additional hydrometric site visits throughout future seasons to verify the operation of data loggers and perform flow measurements, and continued targeting of low flow and/or high flow periods -- particularly extreme peak flow, to maintain and further validate the rating relationships.	This comment extends beyond the scope of annual reporting requirements under Schedule B of the Water Licence and Section 6.4 of the Commercial Lease Agreement. Please refer to the attached Table 4 for more details.

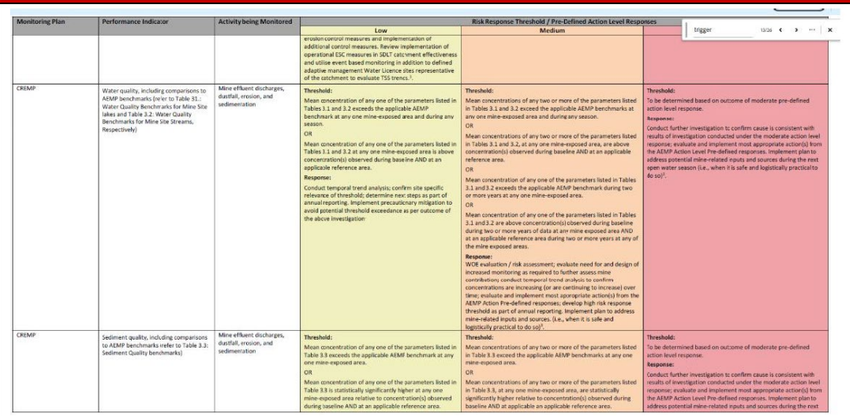
No.	Intervener Comment No.	Intervener Comment	Intervener Recommendation	Baffinland's Response
		Section: 6 Summary and recommendations **Page**: 8 (pdf p. 8 of 9). **Document Name**: Baffinland Iron Mines 2024 Annual Report to QIA and NWB on Operations Intervenor Comments. [NWB Registry: 251002 2AM-MRY2540 2024 Annual Report for Operations - Intervenor Comments BIMC Response Letter Final-ILAE.pdf] **Section**: Attachment 1, Table A.1, Response 33 to QIA AE#17 **Page**: 16 of 77 **Section**: Attachment 5, QIA AE#17 **Page**: 53 of 77		
23	AE#11	With growing evidence in the CREMP of mine-related influences on Project lakes (App. E.9.2, p. v to x) and the planned increase in ore production associated with the Steensby component, improving monitoring and the understanding of temporal changes in sediment deposition and quality is becoming increasingly important. Benthic sediment cores collected from Project-exposed and Reference lakes could be used to establish clearer temporal records of pre-Project sediment deposition quantity and quality and provide context for ongoing deposition of iron and other metals. In comments on Baffinland's 2023 QIA NWB Annual Report on Operations (App. E.13, p. 22-23), QIA recommended Baffinland assess whether there are sites in tributary streams and Sheardown Lake (Northwest and Southeast) with sediment traps that could be core-sampled to extend the temporal records of sediment quality. In its response Baffinland described the difficulty of locating tributary stream habitats that trap fine sediments deep enough for coring, QIA accepts this response. However, it did not address core sampling in the Sheardown Lakes, and argued there is no need for a sediment deposition record that predates the 2005 baseline. It also did not discuss the comparative value of current sediment sampling, which uses a grab sampler and then scrapes off the surface layer for analysis, relative to a tubular core sample that can sectioned into discrete layers. In its comments on the 2024 QIA NWB Annual Report on Operations (ARO), QIA followed up on Baffinland's 2023 response, providing additional information on the value of core sampling from LGL Limited's June 2024 Mary River site inspection report: "*Sedimentation accumulation and sedimentation rates have been reported previously by Baffinland Iron Mines. Rough estimates suggest the 2cm sediment cores collected by Baffinland Iron Mines at lakes located close to Mary River Mine – Sailiivik Camp span a period of ~10 to 15 years. This period extends barely past the start of mining operations. We recommend the collection of full-length lake sediment cores (>50 cm) from lakes located close to the mining operations at Mary River Mine – Sailiivik Camp and reference lakes sites. This Routine analysis of metal concentrations can be reported downcore to provide context to metals concentrations observed in surficial sediment. For example, sediment metal concentrations at the top of the core may still be below sediment quality guidelines but have increased potentially 5-fold above sediment that predates industrial activities in the region. This will provide a more rigorous analysis to develop site*	QIA recommends Baffinland collect sediment cores during the winter or summer 2026 field seasons from Project exposed and Reference lakes to establish clearer temporal records of pre-Project deposition quantity and quality and provide context for ongoing deposition of iron and other metals. Sediment cores should be extruded at 0.5cm intervals and dated using radio isotopes of lead to establish a chronology and put changes in sediment chemistry into temporal context. Each discrete sediment layer should be examined for sediment chemistry of key variables.	Thank you for confirming the acceptance of Baffinland's response regarding the difficulty of locating tributary stream habitats that trap fine sediments deep enough for coring. For lakes, Baffinland maintains that there is requirement for a sediment deposition record pre-dating the 2005-2011 baseline. Sediment chemistry in mine-exposed lakes and Reference Lake 3 is monitored annually as part of the CREMP, and the combined temporal and spatial dataset allows for robust comparisons of current sediment quality conditions to conditions associated with pre-mine operations and/or reference lakes. Sediment samples that are analysed for metal concentrations as part of the CREMP (2005 to 2026) are collected using coring equipment, not a grab sampler. Intact cores, representative of the sediment-water interface, are extruded into a graded core collar, and then the top 2 cm is removed for laboratory analysis. This is the sediment layer where organisms are most likely to interact with, and the associated data are therefore valuable for evaluating potential risks to biota, especially given data is collected annually, as noted above. The Lake Sedimentation Monitoring Program (LSMP) incorporated sediment chemistry analyses for the trap material deposited during the open-water and ice-cover periods in 2023/2024 and 2024/2025. Baffinland has committed to continued monitoring of the chemistry of the materials deposited in the traps, provided sufficient sample mass is obtained for the analysis. Ongoing monitoring of sediment during the ice-cover and open-water periods is expected to provide an indication of changes in chemistry over time. No changes to the study designs for sediment monitoring completed under the CREMP or LSMP are proposed at this time as was discussed within the recent Water Licence Hearing process. The AEMP Rev 3 was circulated through the NWB review process and presented the opportunity for the QIA to comment and progress the change with Baffinland and the NWB through the comment and response process. **Baffinland considers this item (AE#11) closed.**

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		specific baselines for contaminants of concern. Combined with systematic water and surficial sediment sampling, these methods provide a powerful approach to tracking water quality changes at a range of temporal and spatial scales relevant to inform environmental stewardship decisions." (App. E.8.2, pdf p. 112) QIA also recommended that "*Baffinland collect sediment cores during the winter or summer 2026 field seasons from Project exposed and Reference lakes to establish clearer temporal records of pre-Project deposition quantity and quality and provide context for ongoing deposition of iron and other metals. Sediment cores should be extruded at 0.5cm intervals and dated using radio isotopes of lead to establish a chronology and put changes in sediment chemistry into temporal context. Each discrete sediment layer should be examined for sediment chemistry of key variables*." (App. E.8.2, pdf p. 112) Baffinland did not respond to this request, on the basis that QIA's comments "about changing aspects of management plans belong within the review process for the respective management plan (AEMP in this instance), not within the Annual Report review process." (Attachment 5, p. 52 of 77) The QIA request was not addressed to a management plan. It is intended to fill a gap in the baseline data used to inform monitoring, prior to the planned increase in ore production associated with the Steensby Component. Delaying this sampling until after production has increased will weaken its value as baseline for future comparisons. QIA reiterates its recommendation, with the note that winter sampling may be preferable, as it enables immediate freezing to stabilize the core for sampling. **References** **Document Name**: Baffinland Iron Mines 2025 Annual Report to QIA and NWB for Operations, Appendix E.9.2 (CREMP) (260331 - 2025 QIA-NWB Annual Report for Ops - Appendix E.9.2 - 2025 CREMP Report.pdf) **Section**: Executive Summary. **Pages**: v to x (pdf p. 7 to 12 of 977) **Document Name**: Baffinland Iron Mines 2024 Annual Report to QIA and NWB on Operations Intervenor Comments. [NWB registry file: 251002 2AM-MRY2540 2024 Annual Report for Operations - Intervenor Comments BIMC Response Letter Final- ILAE.pdf] **Section**: Attachment 5, Table B.1: 2024 Annual Report QIA Comments no response, QIA NWB AE #12 **Page**: 4 (pdf p. 52 of 77) **Document Name**: Baffinland Iron Mines 2024 Annual Report to QIA and NWB for Operations, Appendix 8.2 (QIA Part 1 of 2) NWB Registry: 250331 - 2024 QIA-NWB Annual Report for Ops - Appendix E.8.2 (QIA) - 1 of 2 -.pdf]		

No.	Intervener Comment No.	Intervener Comment	Intervener Recommendation	Baffinland's Response
		Section: June 2024 site visit **Page**: pdf p. 112 of 125. **Document Name**: Baffinland Iron Mines 2024 Annual Report to QIA and NWB for Operations, Appendix E.13 (2023 Responses) [NWB Registry: 250331 - 2024 QIANWB Annual Report for Ops - Appendix E.13 (2023 Responses)-pdf] **Section**: BIMC 32, QIA CREMP#25 **Page**: 22-23 (pdf p. 23-24 of 76)		
24	AE#12	Concentrations of iron in the sediment of Sheadown Lake Northwest trigger an action response in 2023, 2024 and 2025 (Table 2.7). In 2025, observations included concentrations exceeding the AEMP benchmark. Further, similar to the trend analyses conducted for Sheardown Lake NW in 2024, the trend analyses completed for 2025 identified significant increasing trends in mean iron concentrations in sediments since baseline (2007 to 2025) and over the mine operation period (2015 to 2025). Repeated exceedances of the AEMP benchmarks or above concentration(s) observed during baseline AND at an applicable reference area during two or more years at a single mine-exposed area meet the Trigger Action Response Plan (TARP) criteria for a Medium Action level. Notwithstanding this, the CREMP classifies the response for sediment iron as a Low Risk Response, with recommended actions generally limited to continued monitoring, trend analysis, and source investigation. The actions outlined in the CREMP are broadly consistent with components of a weight-of-evidence evaluation; however, they do not fully align with the prescribed Medium Action response requirements in the current TARP framework (Version 3, 2026). Specifically, the CREMP does not clearly commit to: • evaluation and implementation of predefined AEMP management actions; • development of a high-risk response threshold for sediment iron; and • implementation of measures to address mine-related inputs and sources within defined operational timeframes. The apparent discrepancy between the observed exceedance pattern and the assigned action level introduces uncertainty regarding the consistent application of the TARP framework. While the report attributes elevated iron concentrations largely to natural geologic background conditions and characterizes effects as localized, statistically significant increases and repeated exceedances suggest that potential mine contributions cannot be conclusively ruled out without application of the full Medium Action response. Failure to apply the appropriate action level response reduces confidence that the assessment framework is adequately bounding potential mine-related effects and may delay implementation of proactive mitigation or management measures.	**TARP Alignment:** Demonstrate alignment between observed conditions and the assigned action level by: • clearly documenting the rationale for classifying sediment iron exceedances as Low Risk where Medium Action criteria are met; or • revising the action level classification to be consistent with the TARP triggers. **Implementation of Medium Action Requirements:** Incorporate, at a program level, the full suite of Medium Action responses for parameters exhibiting repeated benchmark exceedances, including: • formal weight-of-evidence (WOE) / risk assessment focused on sediment iron; • evaluation and implementation of appropriate AEMP predefined management actions; • development of high-risk response thresholds for sediment parameters within annual reporting; and • development of a structured plan to identify and address mine-related sources (e.g., tributary inputs such as SDLT1, runoff, and dust deposition), with defined timelines	Please note that TARP thresholds applied in 2024 and 2025 were from the Revision 1 and Revision 2 AEMP study designs, respectively. Data from 2026 represents the first year the TARP (and associated Risk Response Thresholds) from the Revision 3 AEMP study design will be referenced following approval of Baffinland's new water licence and AEMP rev 3 submission. A Low-Risk Response was triggered in 2025 because iron concentrations in littoral sediments from Sheardown Lake NW were above the AEMP benchmark and baseline conditions. Because sediment iron concentrations in Sheardown Lake NW and Reference Lake 3 were comparable in 2025, a Moderate-Risk Response was not triggered, based on the TARP in the Revision 2 AEMP study design. The 2026 CREMP report will clearly document the rationale for classifying potential mine-related effects as Low, Medium, or High Risk, based on the TARP presented in the Revision 3 AEMP study design (i.e., action level classifications will be consistent with the TARP triggers in Revision 3). The Revision 3 TARP considers optimization and feedback through implementation of Revisions 1 and 2 and is expected to support formation of robust conclusions and recommendations for management actions. Sediment chemistry and Benthic Invertebrate Community (BIC) sampling were completed in Sheardown Lake NW in August 2026, similar to previous years of CREMP monitoring, and these data will support a WOE evaluation of sediment iron concentrations. Temporal and spatial patterns (within the lake and relative to reference) will support understanding of temporal patterns and potential sources of iron. The 2026 report will provide recommendations related to plans and timelines, as appropriate, for source investigations, as well as developing potential High Risk Response Thresholds, if applicable. **Baffinland considers this item (AE#12) closed.**

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		References **Document Name**: Appendix E.9.2 Mary River Project 2025 Core Receiving Environmental Monitoring Program Report **Section**: 2.3.3.2 Special Investigations (page 51 – 53) **Page**: 51-53 and 206 of 977	for implementation during operational periods.	
25	AE#13	The application of Trigger Action Response Plan (TARP) classifications in the 2025 CREMP is not consistent with Version 3 of the TARP (Baffinland, 2026). The CREMP continues to use the term "Moderate Action Response" rather than the current terminology "Medium Action Response," creating uncertainty regarding whether the latest approved framework has been applied. In addition, the assignment of Medium Action Responses does not appear to be based on a systematic evaluation of all applicable trigger criteria. The TARP defines a Medium Action Response to include conditions such as: • exceedance of AEMP benchmarks by two or more parameters within a mine exposed area; or • mean concentrations of any two or more parameters exceeding both baseline and reference conditions at any one mine-exposed area; or • repeated exceedances of AEMP benchmarks by a single parameter across multiple years; or • mean concentration of any one parameter above concentration(s) observed during baseline and applicable reference area during two or more years at any of the mine exposed areas. Several examples identified in the CREMP (e.g., uranium in CLT1 Upper Main Stem; copper, nitrate, and uranium in SDLT1; and dissolved copper in Sheardown LakeNW) appear to meet one or more of these criteria. However, the report does not clearly demonstrate that all relevant triggers (e.g., multi-parameter or multi-year exceedances) were evaluated and documented when assigning action levels. The CREMP recommendations also do not consistently incorporate the full suite of required responses outlined in the TARP: For Low Risk Responses, the required action to "implement precautionary mitigation to avoid potential threshold exceedance" is not included. For Medium Action Responses, recommendations do not consistently include evaluation and implementation of predefined AEMP actions, development of high-risk response thresholds, or implementation of plans to address mine related sources.	Update CREMP reporting to align fully with TARP Version 3, including consistent terminology and clear linkage between observed conditions and trigger criteria. Implement a standardized approach to identify and document all trigger conditions (including multi-parameter and multi-year exceedances) at each mine-exposed area. Ensure that all recommendations explicitly incorporate the complete set of required TARP responses for each action level, including precautionary mitigation for Low Risk and predefined management actions and source control for Medium Action responses. Strengthen transparency by including a summary table that links monitoring results, triggered action levels, and required versus implemented management actions.	The 2025 CREMP was implemented under the Revision 2 AEMP study design and TARP classifications and response actions in the 2025 report are consistent with this version of the study design; Revision 3 will be implemented for the first time in 2026. The terminology used in the 2026 CREMP interpretive report will align with that of the Revision 3 AEMP design. The 2026 CREMP report will clearly demonstrate that all relevant triggers (e.g., multi-parameter or multi-year exceedances) were evaluated and documented when assigning action levels; clear linkages between each triggered parameter/location and the corresponding Action Level Response will be made. Additionally, the full suite of responses (e.g., investigation, mitigation, management) at each level will be considered during development of report recommendations. The 2026 CREMP report will include a summary table of monitoring results, triggered action levels (with locations and parameters clearly identified), and required/planned versus implemented mitigation/management actions. High Risk Response Thresholds will be developed based on the outcomes of pre-defined Moderate Action Level Responses. Overall, implementation of the Revision 3 AEMP study design is expected to improve the effectiveness of the CREMP program in proactively managing mine-related effects. **Baffinland considers this item (AE#13) closed.**

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		The lack of consistent alignment with the current TARP framework reduces confidence that action levels are being correctly identified and that the corresponding management responses are being fully implemented. This may result in under-classification of action levels and delays in applying appropriate mitigation measures. **References** **Document Name**: Appendix E.9.2 Mary River Project 2025 Core Receiving Environmental Monitoring Program Report **Section**: 3 Camp Lake System; Sheardown Lake System; Mary River and Mary Lake System; **Page**: 74 – 300 of 977		
26	AE#14	In Section 3.1.4.1.1 (Effects Assessment), a Low Risk Response is identified for multiple parameters in CLT1 North Branch. The recommendations provided in Section 3.1.4.1.2 appropriately focus on monitoring, temporal trend analysis, source investigation, and weight-of-evidence evaluation; however, they do not include the full set of required management responses defined under Version 3 of the Trigger Action Response Plan (TARP). Specifically, the prescribed Low Risk Response includes implementation of precautionary mitigation to avoid potential threshold exceedance, in addition to investigation and monitoring. This component is not reflected in the CLT1 North Branch recommendations. This omission is not isolated. Across multiple study areas where Low Risk Responses are triggered (e.g., CLT2, Camp Lake, Camp Lake Outlet, SDLT1, Sheardown Lake NW and SE, MRTF, and Mary Lake), recommendations consistently focus on monitoring and assessment, but do not identify or propose precautionary mitigation measures. Similarly, where Medium Risk Responses (referred to as Moderate in the CREMP) are triggered (e.g., nitrate and uranium at SDLT1; total aluminum at Sheardown Lake SE), recommendations do not incorporate all required TARP actions. These include: evaluation and implementation of AEMP pre-defined management actions; development of High Risk response thresholds; and implementation of plans to address mine-related inputs and sources. Table 5-1 of the TARP distinguishes between investigative requirements and response actions for each threshold.	Revise the CREMP reporting approach to ensure that all recommendations explicitly address the full set of required actions for each TARP response level, including investigation, mitigation, and management components. For Low Risk Responses, identify and document precautionary or adaptive mitigation measures implemented or proposed, informed by ongoing investigations, to prevent further exceedances and avoid escalation of conditions. For Medium Risk Responses, include evaluation and implementation of AEMP pre-defined responses, development of higher-tier (High Risk) response thresholds, and clear plans to address mine-related sources and pathways. Incorporate a standardized framework within the CREMP that explicitly links each triggered parameter and location to the corresponding TARP response level and all required actions. Include a standardized summary table demonstrating, for each triggered parameter and location, that all required TARP response components have been addressed, to improve completeness, transparency, and traceability of the response framework.	Please see the response to Intervenor Comment AE#13, above. **Baffinland considers this item (AE#14) closed.**

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		 For Low Risk thresholds, this includes implementation of mitigation measures to prevent escalation. For Medium Risk thresholds, escalation to defined management actions and source control is required. These elements are not consistently reflected in the CREMP recommendations. The CREMP does not clearly demonstrate that all required response elements under the current TARP framework are being implemented. The absence of precautionary mitigation for Low Risk responses and incomplete implementation of required actions for Medium Risk responses reduces confidence that the AEMP Data Assessment and Response Framework is being applied as intended. This may limit the effectiveness of the program in proactively managing mine-related effects and preventing escalation. **References** **Document Name**: Appendix E.9.2 Mary River Project 2025 Core Receiving Environmental Monitoring Program Report **Section**: 3 Camp Lake System; Sheardown Lake System; Mary River and Mary Lake System; **Page**: 74 – 300 of 977		
27	AE#15	The CREMP indicates that water quality downstream of the KM 105 Pond has consistently met Water Licence limits and applicable water quality guidelines, while also acknowledging that conditions in SDLT1 reflect mine-related influences based on the AEMP data assessment approach and response framework. However, the report does not clearly delineate the extent to which the KM 105 Pond (including seepage and treated effluent) contributes to the observed exceedances and mine-related signals at SDLT1. While potential sources such as runoff, dust deposition, and water management inputs	Provide a clear assessment of the relative contribution of the KM 105 Pond to observed changes in water quality at SDLT1, including differentiation from other potential mine-related sources (e.g., runoff, dust deposition, and other water management infrastructure). Incorporate source apportionment or lines of evidence (e.g., spatial gradients, temporal	An expanded discussion of potential natural and mine-related influences on SDLT 1 will be included in the 2026 CREMP report.

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		are referenced, the relative contribution of the KM 105 Pond is not explicitly quantified or distinguished from other potential sources. The absence of a clear and transparent attribution of sources introduces uncertainty in the interpretation of mine-related effects at SDLT1. Without explicitly identifying whether the KM 105 Pond is a primary driver of observed exceedances, or one of several contributing sources, it is difficult to evaluate the effectiveness of current water management measures and to determine whether additional mitigation or controls are warranted. This limits the ability of the CREMP to support targeted, source-specific management responses and reduces confidence in conclusions regarding compliance and environmental performance. **References** **Document Name**: Appendix E.9.2 Mary River Project 2025 Core Receiving Environmental Monitoring Program Report **Section**: 4.1.1.2 Water Quality **Page**: 167 of 977	trends, geochemical signatures, or mass loading estimates) to support attribution of observed exceedances. Strengthen linkage between identified sources and management actions by explicitly identifying which infrastructure or pathways are responsible for observed effects and how these will be addressed. Ensure future CREMP reporting clearly differentiates between compliance with discharge criteria and downstream environmental response, and identifies how mine related influences persist despite compliance.	
28	AE#16	The CREMP indicates that no water chemistry samples were collected from SDLT12 in 2025 due to low water levels during the spring, summer, and fall monitoring events. However, Section 4.2.1.1 indicates that in situ water quality measurements were collected in the spring, with insufficient water only identified for the summer and fall periods. The reporting of sampling conditions and data availability for SDLT12 is therefore not internally consistent. It is unclear whether the limitation applies to all water quality parameters (including in situ measurements and water chemistry) or is specific to certain sampling components or seasons. Inconsistent description of sampling conditions and data availability reduces transparency and limits confidence in the interpretation of results. Clear documentation of when and where data were collected (or not collected), and the reasons for any deviations, is critical to understanding monitoring coverage and interpreting temporal trends within the CREMP. **References** **Document Name**: Appendix E.9.2 Mary River Project 2025 Core Receiving Environmental Monitoring Program Report **Section**: 4.2.1.2 Water Chemistry; 4.2.1.1 In Situ Water Quality **Page**: 176 and 175 of 977	Ensure consistent and clearly reconciled descriptions of sampling conditions, data availability, and limitations across all sections of the CREMP. Clearly differentiate between in situ measurements and water chemistry sampling when describing data gaps. Provide a standardized summary of data completeness by station, parameter type, and season to improve transparency and support interpretation of results.	Based on the dates, the referenced in-situ water quality measurements at SDLT12 (D12-1) were collected in early-June during freshet monitoring and the location (D12-1) was found to be dry during the 2025 CREMP spring sampling event (D12-1 was visited on July 1, 2025) and subsequent 2025 CREMP sampling events. As the conditions and timing of these in-situ water quality measurements are not in line with the 2025 CREMP, they should be excluded from the analysis and, as such, have no accompanying interpretation given that SDLT12 (D12-1) was dry in spring, summer, and fall. Generally speaking, there are also scenarios throughout select low flow monitoring points that can support an insitu probe being utilised to record data, however water level is not significant enough to obtain a representative sample. Furthermore, the 2025 CREMP annual report differentiates 'in-situ water quality' and 'water chemistry' as two components of 'water quality'. The 2025 CREMP sampling schedules are provided in Table 2.2 (Water Quality and Phytoplankton), Table 2.4 (Special Investigations), Table 2.5 (Lake Sediment), Table 2.8 (Stream and River Benthic Invertebrate Community [BIC]), and Figure 2.5 and Figure 2.6 (Fish) of the 2025 CREMP annual report. Table 2.1 of the 2025 CREMP annual report accurately lists the deviation related to 'water chemistry' samples at SDLT12, as well as other deviations. **Baffinland considers this item (AE#16) closed.**
29	AE#17	The CREMP indicates that low water levels at SDLT12 (Station LDFG-OUT/D12-1) precluded collection of water chemistry samples during the 2025 monitoring period, while also stating that in	Provide a clear and consistent description of sampling conditions and data limitations across all sections of the CREMP, including	Please see the response to Intervenor Comment AE#16, above. **Baffinland considers this item (AE#17) closed.**

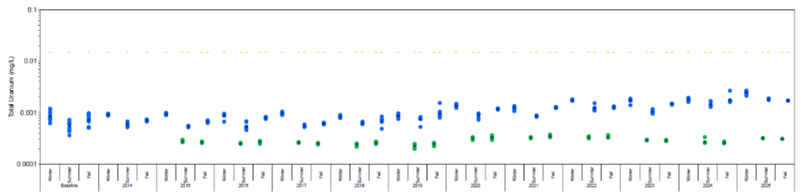
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		situ water quality data were collected in the spring and used to support the conclusion that no action level responses were triggered. Across sections of the report, the description of sampling conditions and data limitations for SDLT12 is not internally consistent. It is unclear why conditions were sufficient to collect in situ measurements (at least in spring), but insufficient to collect water chemistry samples. The report does not provide sufficient detail on hydrologic conditions (e.g., flow presence, water depth, or degree of stagnation) to support this distinction. The lack of clarity and consistency in describing data availability at SDLT12 introduces uncertainty in the interpretation of monitoring results and the conclusion that no action level responses were triggered. Without clear documentation of sampling constraints and field conditions, it is difficult to assess whether the dataset is representative and sufficient to support effects assessment. This reduces confidence in the completeness and transparency of the CREMP and limits the ability to evaluate temporal trends and potential mine-related influences at this location. **References** **Document Name**: Appendix E.9.2 Mary River Project 2025 Core Receiving Environmental Monitoring Program Report **Section**: 4.2.3.1 Effects Assessment **Page**: 181	reconciliation of any discrepancies between in situ measurements and water chemistry sampling. Clearly differentiate between sampling types (e.g., in situ versus water chemistry) and specify the conditions under which each can or cannot be collected. Document supporting field conditions (e.g., flow presence, water depth, pooling versus flowing conditions) where sampling is not completed, to substantiate data gaps. Include a standardized summary of data completeness by station, season, and parameter type to improve transparency and support interpretation of results.	
30	AE#18	The CREMP identifies changes in sediment characteristics in Sheardown Lake NW, including a shift toward finer-grained material (increased silt, decreased sand) and lower TOC relative to reference conditions, as well as statistically significant increases in sediment iron concentrations relative to both baseline and over the operational period. These observations indicate a change in sediment depositional regime relative to baseline; however, the potential causes of these changes are not fully evaluated in the report. In particular, the potential influence of mine-related dust deposition, which could reasonably contribute to finer sediment inputs and associated geochemical changes, is not discussed in this section. The report further concludes that iron concentrations in Sheardown Lake NW are consistent with natural conditions based, in part, on comparison to Reference Lake 3. However, reported mean concentrations in Sheardown Lake NW exceed baseline concentrations and AEMP benchmarks, and exhibit statistically significant increasing trends over time, which are not observed at the reference site. This suggests that the interpretation of iron as primarily geogenic is not sufficiently supported without additional analysis of potential mine-related contributions. BIM has not incorporated findings from the Lake Sedimentation Monitoring Program (LSMP) within a weight-of-evidence framework. The LSMP identifies increasing sedimentation rates and	Expand source attribution analyses for sediment quality in Sheardown Lake NW using a weight-of-evidence approach that integrates CREMP and LSMP results, including sediment characteristics, sedimentation rates, accumulation trends, and sediment chemistry. Explicitly evaluate potential mine-related pathways (e.g., dust deposition, runoff, and watercourse inputs) in the context of observed long-term increases in sedimentation and changes in particle size distribution. Reconcile interpretations of natural background conditions with increasing temporal trends, benchmark exceedances, and differences from reference conditions, including consideration of cumulative and interacting drivers.	An expanded discussion of potential natural and mine-related influences in Sheardown Lake NW will be included in the 2026 CREMP report.

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		accumulation thickness over the operational period, with statistically significant positive trends, most pronounced during the open water season, and consistent increases across monitoring areas, indicating a system-wide shift in sediment deposition. While natural drivers (e.g., rainfall, runoff, and backflow events) are identified, the LSMP also acknowledges a potential mine influence associated with these long-term trends. In addition, LSMP results identify elevated metal concentrations (including iron) in sediment trap material and ongoing deposition of fine particulate material, consistent with continued particulate inputs. While BIM attributes elevated iron concentrations primarily to geogenic sources, this interpretation does not adequately account for increasing sedimentation trends coincident with mine operations, observed shifts toward finer sediment, and the potential for cumulative contributions from mine-related pathways, including dust deposition and site runoff. The combined evidence of increasing sedimentation rates, changes in particle size distribution, and elevated metals indicates that a mine-related contribution cannot be ruled out and is not sufficiently evaluated in the CREMP or LSMP interpretation. Overall, the CREMP and LSMP do not provide a robust or integrated assessment that reconciles sediment quality trends with sedimentation dynamics. Conclusions that conditions are primarily reflective of natural background are not clearly supported when considering the full monitoring dataset. **References** **Document Name**: Appendix E.9.2 Mary River Project 2025 Core Receiving Environmental Monitoring Program Report Appendix E.9.3 Lake Sedimentation Monitoring Program Report **Section**: 4.4.2 Sediment Quality; 3.2.2 Temporal Comparisons for the 2024 to 2025 Ice Cover and Open Water Periods; 3.3.2 Sediment Trap Chemistry **Page**: 196 – 206 of 977; 41 of 231; 39 of 231	Strengthen linkage between observed sediment changes and potential management responses within the AEMP/TARP framework, particularly where systematic increases in sedimentation are identified over the operational period.	
31	AE#19	The CREMP identifies statistically significant increasing trends in aqueous concentrations of nitrate, sulphate, molybdenum, and uranium in Sheardown Lake SE over both the baseline and operational periods, with generally stable conditions at reference locations. These patterns indicate potential mine-related influence; however, concentrations remain below applicable AEMP benchmarks and water quality guidelines in 2025. While the CREMP appropriately identifies and evaluates these trends, the implications of these results are not clearly linked to the TARP (Version 3, 2026). As outlined in Table 5-1, of the TARP framework is intended to support adaptive management through not only threshold exceedances, but also through investigation outcomes that inform mitigation and management actions.	Explicitly link the results of temporal trend analyses to the TARP response framework, consistent with Table 5-1, including identification of appropriate response actions where increasing trends are observed. Where trends indicate potential mine-related influence, include evaluation of potential sources and pathways and document lines of evidence supporting source attribution.	The 2025 CREMP was implemented under the Revision 2 AEMP study design (i.e., results for 2025 were interpreted based on the TARP in Revision 2). The Revision 3 AEMP study design will be implemented for the first time in 2026. The 2026 CREMP report will demonstrate that relevant triggers (e.g., multi-parameter or multi-year exceedances) were evaluated and documented when assigning action levels. Results of trend analyses will be considered as part of a WOE approach. Additionally, the full suite of responses (e.g., additional analyses, source/pathway investigation, mitigation, management) at each level will be considered during development of report recommendations.

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		The TARP Low Risk response includes evaluation of trends and implementation of measures to mitigate potential threshold exceedance where warranted. Increasing trends, even where benchmarks are not exceeded, represent an early indication of changing conditions and should inform precautionary or adaptive management consistent with the intent of the framework. Although increasing trends and differences from reference conditions are identified, the CREMP does not clearly demonstrate how these findings are carried forward into the TARP response framework. There is no explicit evaluation of potential sources or pathways, nor identification of precautionary mitigation or management options in response to these trends. This limits the ability of the CREMP to function as an adaptive management tool and reduces confidence that emerging mine related influences are being proactively managed prior to threshold exceedance. **References** **Document Name**: Appendix E.9.2 Mary River Project 2025 Core Receiving Environmental Monitoring Program Report **Section**: 4.5.1.2 Water Chemistry **Page**: 228-229 of 977	Identify precautionary or adaptive management measures that could be implemented if trends persist, consistent with Low-Risk response requirements to mitigate potential threshold exceedance. Establish clear criteria or decision points within the CREMP for escalation of management actions in advance of AEMP benchmark exceedance, in alignment with the intent of the TARP.	**Baffinland considers this item (AE#19) closed.**
32	AE#20	The CREMP identifies a shift toward finer-grained sediment in Sheardown Lake SE, including increased silt and decreased sand relative to both baseline and Reference Lake 3, as well as lower TOC content in 2025. The report attributes this change primarily to deposition of naturally suspended fine material associated with Mary River backflow during high flow conditions. While this is a plausible contributing mechanism, the evaluation does not consider or discuss other potential mine-related pathways that could influence sediment composition. The observed shift toward finer sediments relative to both baseline and reference conditions represents a change in depositional regime that warrants a broader assessment of potential contributing factors. In particular, potential contributions from mine-related dust deposition or other operational inputs are not evaluated, despite similar patterns being observed in Sheardown Lake NW. The CREMP does not provide a sufficiently comprehensive evaluation of potential sources contributing to observed changes in sediment grain size and composition. Attribution of finer sediment deposition primarily to natural backflow processes is not clearly reconciled with: • consistent differences from reference conditions; and • shifts relative to baseline conditions during the operational period. The absence of consideration of alternative pathways, including mine-related inputs, limits confidence in the interpretation and may result in incomplete characterization of potential mine-related effects.	Expand source attribution for sediment quality in Sheardown Lake SE to evaluate both natural and mine-related pathways (e.g., backflow processes, dust deposition, and runoff). Apply a weight-of-evidence approach to distinguish between natural variability and potential mine-related influences, supported by spatial and temporal analyses. Ensure that interpretations of sediment changes are explicitly reconciled with baseline and reference comparisons. Link sediment trend observations to the TARP framework to determine whether additional investigation or management actions are warranted where sustained shifts are observed.	An expanded discussion of potential natural and mine-related influences on sediment composition and chemistry in Sheardown Lake SE will be included in the 2026 CREMP report. Baffinland will also consider the utility of additional statistical analyses (e.g., Before-After-Control-Impact (BACI)-style analyses) to distinguish between natural variability and potential mine-related influences. Differences relative to baseline and reference and patterns of increasing or decreasing particle sizes/concentrations over time will be considered when linking results to Risk Response Thresholds in the TARP in the Revision 3 AEMP study design.

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		References **Document Name**: Appendix E.9.2 Mary River Project 2025 Core Receiving Environmental Monitoring Program Report **Section**: 4.5.2 Sediment Quality **Page**: 229 of 977		
33	AE#21	The CREMP concludes that effluent from the MS-08 Final Discharge Point (FDP) is a source of nitrate and sulphate to MRTF, and identifies increasing trends in these parameters over time relative to baseline, while noting that concentrations remain below AEMP benchmarks through 2025. While this finding appropriately identifies a mine-related source, the interpretation is not fully developed. It is unclear whether MS-08 FDP is considered the sole source of nitrate and sulphate to MRTF, or one of several contributing pathways. The report does not clearly evaluate other potential mine-related or natural sources, nor does it reconcile source attribution with the observed long-term increasing trends. In addition, although increasing trends have been identified and a source has been partially attributed, the CREMP does not clearly demonstrate how these findings are incorporated into the TARP (Version 3, 2026). As outlined in Table 5-1, the TARP framework requires that outcomes of investigations inform management responses, including evaluation of mitigation and implementation planning where mine-related influences are identified. The CREMP does not clearly demonstrate how identified mine-related sources and increasing trends in MRTF are translated into management actions under the TARP. The absence of: • clear confirmation of whether MS-08 FDP is the primary or sole source; • evaluation of other potential contributing pathways; and • identification of potential mitigation or management options limits confidence that the AEMP/TARP framework is being applied proactively. Reliance on the fact that concentrations remain below AEMP benchmarks, without consideration of increasing trends and identified sources, may delay implementation of appropriate management actions and does not align with the adaptive management intent of the TARP. **References** **Document Name**: Appendix E.9.2 Mary River Project 2025 Core Receiving Environmental Monitoring Program Report **Section**: 5.2.3.1 Effects Assessment	Clearly define and document the relative contribution of MS-08 FDP to nitrate and sulphate concentrations in MRTF, and evaluate other potential mine-related and natural sources. Explicitly link investigation findings (including source attribution and increasing trends) to the TARP framework (Table 5-1), including identification of appropriate response actions. Identify and evaluate potential mitigation or management options that could be implemented if trends continue or thresholds are approached, consistent with proactive management expectations. Establish clear decision points or contingency measures within the CREMP to enable timely implementation of management actions in advance of AEMP benchmark exceedance.	The Mary River Project's Phase 4 EEM Program Interpretive Report is due to regulators in January 2027 and will include effluent and receiving environment data associated with the MS-08 FPD. The 2026 interpretive report for the CREMP will expand on the 2025 evaluation of MS-08 as a potential source of nitrate and sulphate to MRTF. CREMP data and the results of the Phase 4 EEM will be considered, and efforts will be made to identify natural and mine-related sources, other than MS-08, of nitrate and sulphate to MRTF. Water quality results for MRTF will be compared to TARP Risk Response Thresholds outlined in Table 6.1 of the Revision 3 AEMP study design. Baffinland will consider potential mitigation or management options that could be proactively implemented to address increasing aqueous concentrations of nitrate and sulphate in MRTF. Implemented or planned/recommended management actions will be documented as part of the 2026 reporting cycle.

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34	AE#22	Review of temporal comparison figures for multiple parameters (including nitrate-N, nitrate at Sheardown Lake SE, nitrite, total chromium, total iron, total thallium at Sheardown Lake SE, and dissolved zinc) indicates inconsistent and, in several cases, increasing analytical detection limits (LRLs) between baseline and recent monitoring periods. Detection limits for several parameters (e.g., nitrite beginning ~2023, nitrate-N, and nitrate at Sheardown Lake SE) appear to increase in recent years relative to baseline conditions. Similarly, total chromium detection limits are higher during operations compared to baseline, and comparable concerns are evident for total iron. For total thallium at Sheardown Lake SE, detection limits appear variable and elevated relative to earlier data, while dissolved zinc detection limits are not clearly comparable between baseline and recent datasets. Detection limits would typically be expected to remain consistent or decrease over time with improvements in analytical methods. The observed increase in detection limits reduces analytical sensitivity in recent years and limits the ability to evaluate trends. In particular, where detection limits are higher than baseline, it is not possible to reliably determine whether concentrations of parameters such as nitrate-N, nitrate (Sheardown Lake SE), total chromium, total iron, and total thallium have increased over time, as low-level changes may not be detectable. The variability and apparent increase in detection limits across monitoring periods reduces confidence in the comparability of datasets and the interpretation of longterm trends. Specifically: • comparisons to baseline are biased where baseline detection limits are lower than recent data; • increasing detection limits may mask subtle but meaningful changes in concentration over time; and • the ability to assess trends for several parameters (including nitrate-N, nitrate at Sheardown Lake SE, total chromium, total iron, and total thallium) is limited where detection limits exceed measured concentrations. The CREMP does not provide sufficient explanation for these changes in detection limits, nor does it evaluate the implications for trend analysis and effects assessment. **References** **Document Name**: Appendix E.9.2 Mary River Project 2025 Core Receiving Environmental Monitoring Program Report **Section**: Appendix B	• Provide a clear explanation for changes in detection limits across monitoring periods, including any changes in analytical methods, laboratories, or reporting protocols. • Standardize detection limits across the dataset to the extent practicable, or apply consistent data treatment approaches to ensure comparability with baseline conditions. • Evaluate and document the implications of varying detection limits on temporal trend analyses and interpretation, particularly for parameters where trends cannot be reliably assessed due to analytical constraints. • Ensure future monitoring maintains detection limits that are consistent with or lower than baseline conditions to support defensible long-term comparisons. • Where detection limits constrain interpretation (e.g., nitrate-N, total chromium, total iron, total thallium), identify and implement analytical improvements or targeted methods to increase sensitivity and enable robust trend assessment.	Consistent with previous CREMP reports, the 2026 report will rely on industry-standard approaches for accommodating values below LRLs when performing statistical comparisons (temporal and spatial). Consistent with previous CREMP reports, the 2026 report will include a Data Quality Review (DQR), which includes an assessment of achieved LRLs and whether they are suitable to meet project objectives. The DQR results for 2026 will be reviewed to inform potential adjustments (e.g., use of a different laboratory or analytical method for specific parameters). Please note that DQR results for the 2025 CREMP monitoring indicated that LRLs for water quality parameters were lower than applicable water quality guidelines and AEMP benchmarks and therefore appropriate for meeting study objectives. The 2026 CREMP report will clearly indicate when statistical analyses cannot be reliably assessed for a given water quality parameter, due to differences in LRLs over time. Supplemental information on changes in analytical methods, laboratories, or reporting protocols will be included as needed to contextualize the results.

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35	AE#23	Visual inspection of total uranium concentrations in Sheardown Lake SE indicates an increasing trend over the monitoring period, with concentrations rising relative to baseline and reference conditions, although remaining below the applicable AEMP benchmark. While the CREMP identifies and discusses trends qualitatively, it does not extend this analysis to evaluate the rate of increase or the potential timeframe over which concentrations may approach applicable benchmarks. The TARP framework (Table 5-1) is intended to support adaptive management by using monitoring results and trend analyses to inform proactive responses, not solely reactive measures following threshold exceedance. The CREMP does not fully utilize trend information to inform forward-looking  management. The absence of quantitative trend evaluation (e.g., rate of change or projection toward benchmarks) limits the ability to: • assess the urgency of potential future exceedances; and • plan and implement mitigation measures in advance of threshold exceedance. Reliance on current compliance with AEMP benchmarks, without consideration of increasing trajectories, reduces confidence that the program is functioning proactively in accordance with the intent of the TARP. **References** **Document Name**: Appendix E.9.2 Mary River Project 2025 Core Receiving Environmental Monitoring Program Report **Section**: Appendix B **Page**: 535	Incorporate quantitative trend analyses for key parameters (e.g., total uranium) to estimate rates of change and project potential timelines to AEMP benchmark exceedance, where appropriate. Use trend projections to inform proactive management planning, including identification of mitigation options and triggers for early intervention under the TARP framework. Integrate trend-based evaluation into the CREMP reporting to support adaptive management decisions, consistent with the intent of Table 5-1.	The 2026 CREMP report will include statistical analyses of temporal trends as outlined in Table 6.1 of the 2025 CREMP report and the Revision 3 AEMP study design. A separate memorandum related to uranium benchmark derivation and source identification is being prepared. Key results of the memorandum will be carried forward to the 2026 CREMP report, to support interpretation of results and development of recommendations (e.g., related to mitigation or additional monitoring).
36	AE#24	Across multiple sites in the CREMP, the report alternates between identifying statistically significant and/or ecologically meaningful differences and concluding that effects are not present due to lack of consistent temporal trends or because of natural/habitat variability.	The existing weight-of-evidence framework places too much emphasis on threshold exceedances, giving limited consideration to	The identification of statistically significant differences in BIC endpoints between years or between areas does not, on its own, provide sufficient evidence to conclude mine-influence. The use of well-established thresholds (e.g., Critical Effect Sizes (CES) for BIC and fish, as described in

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		The interpretation appears inconsistent throughout the CREMP. The focus on the absence of clear directional trends is used to discount observed differences (e.g., density declines, FFG shifts, community dissimilarity), regardless of evidence of: • persistent differences (e.g., density lower since ~2016), • multiple Low/Moderate Risk responses, and • ecologically meaningful endpoint deviations. This approach may overlook cumulative or non-linear ecosystem responses and miss early signals of change. Some examples of this include: 1. Section 3.1.3.1 North Branch (CLT1-US) – "In 2025, total invertebrate densities and the relative proportions of Nematoda, Oligochaeta, Chironomidae, shredders, and burrowers were significantly higher at the CLT1 Upper Main Stem (CLT1-L2) compared to the reference area. In contrast, Simpson's Evenness and the relative proportions of Ostracoda, Simuliidae, and sprawlers were significantly lower at the CLT1 Upper Main Stem relative to the Reference Creek. Of these endpoints, only density and the relative proportions of shredders, sprawlers, and burrowers were outside the CESBIC ±2 SDREF, indicating ecologically meaningful differences. Bray–Curtis similarity analysis also identified significant differences in community structure between CLT1-L2 and the reference area; the results of the dbRDA analysis in particular indicated strong environmental controls on community dissimilarity. These patterns likely reflect localized habitat differences between the Upper Main Stem and Reference Creek, rather than mine influence." 2. Section 4.1.3 SDLT1 – "In 2025, most BIC endpoints at SDLT1 were comparable to those observed at Reference Creek (Station REF-CRK), except the relative proportions of Nematoda, Ostracoda, Oligochaeta, Simuliidae, collectorgatherers, filterers, and burrowers. None of these differences were considered ecologically meaningful (i.e., all MODs were within the CESBIC of ±2 SDREF; Table 4.2; Appendix Figure E.7). However, despite the absence of ecologically meaningful endpoint-level differences, Bray–Curtis similarity analysis results were indicative of relatively large (i.e., R2 = 0.74 and adjusted R2 = 0.57 for the Mantel Test and dbRDA, respectively) difference in overall community structure between SDLT1 and the reference area. These subtle compositional differences are likely attributable to natural variation in habitat conditions between areas, particularly the presence of bryophytes and algae at SDLT1 but not REF-CRK." **References** **Document Name**: Appendix E.9.2 Mary River Project 2025 Core Receiving Environmental Monitoring Program Report	consistent below-threshold information that is evident across many sites over several years. These patterns are repeatedly dismissed as not mine-related. Consistency in direction and magnitude across sites and biological communities represents meaningful evidence of effect and must be explicitly considered, even when individual metrics do not trigger project thresholds.	the Metal and Diamond Mining Effluent Regulations) for identifying ecologically meaningful differences between areas/years of data (i.e., differences that are of sufficient magnitude they cannot be attributed to natural factors alone) is common practice for EEM and AEMPs. Additionally, it is reasonable to consider that consistent differences in BIC endpoints between a mine-exposed and reference area, for example, may result from natural differences in habitat (e.g., substrate composition, sources of organic matter inputs) unrelated to mine influence. This is why additional details related to habitat and BIC characteristics (e.g., timing of emergence) were considered in interpreting the BIC results for 2025. In addition to the lines of evidence noted above, the 2026 CREMP report is planned to include Before-After-Control-Impact (BACI)-type analyses for CREMP waterbodies/watercourses where Low Risk Responses were triggered for BIC in 2025. The BACI-type analyses will allow the study team to determine whether differences between mine-exposed and reference areas have changed over time relative to baseline (e.g., if invertebrate densities have always been different between the mine-exposed and reference area, and that difference is not getting significantly larger or smaller, then it may be reasonably concluded there is no adverse mine-related effect on invertebrate densities in the exposed area).

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37	AE#25	Observed differences in biological endpoints (e.g., benthic community composition, functional feeding groups, and density) are frequently attributed to natural interannual variability or habitat-related factors (e.g., substrate conditions, organic matter availability, vegetation, bryophyte presence, flow) without quantitative evaluation of these drivers or comparison to alternative explanations. The repeated use of habitat variability as a default explanatory mechanism, without supporting analysis, reduces confidence in the interpretation of results. This is particularly relevant where: • statistically significant and/or ecologically meaningful differences are observed, • mine-related stressors (e.g., changes in water quality, sedimentation, or chemistry) are also present, and • similar patterns occur across multiple endpoints or years. Relying on assumed habitat differences in the absence of demonstrated relationships may influence the weight of evidence toward natural explanations and reduce the ability to identify mine-related or cumulative effects. For example, the report notes that bryophytes were present at CLT1-US but absent from the reference creek in 2025, and that bryophytes provide habitat complexity that can trap coarse and fine particulate matter, thereby increasing retention of food resources for benthic invertebrates. This is a plausible habitat-based explanation; however, it is unclear whether bryophyte presence was documented during baseline conditions at CLT1-US/DS or in the Sheardown Lake tributaries, or whether changes in bryophyte presence over time have been evaluated. **References** **Document Name**: Appendix E.9.2 Mary River Project 2025 Core Receiving Environmental Monitoring Program Report **Section**: 3.1.3.1 - North Branch (CLT1-US), 3.1.3.3 - Lower Main Stem (CLT1-DS), 4.1.3 - Benthic Invertebrate Community, 4.2.2 - Benthic Invertebrate Community and 4.3.3 - Benthic Invertebrate Community **Page**: 86 - 189 of 977	The proponent should clarify how habitat variability has been accounted for in the interpretation of biological responses to ensure that conclusions regarding potential mine-related effects are well supported. This should include confirming whether bryophytes were noted during baseline conditions at CLT1-US/DS and in Sheardown Lake tributaries, and whether temporal changes in bryophyte presence or abundance have been considered when interpreting benthic invertebrate responses.	The Revision 2 AEMP study design that was implemented in 2025 included TARP thresholds for key endpoints of invertebrate density, Simpson's Evenness, and taxonomic richness. Where Low or Moderate Risk Responses were triggered, based on results for these endpoints in 2025, next steps for the 2026 CREMP report include completion of Before-After-Control-Impact (BACI)-style analyses of BIC data (baseline to present). The BACI-type analyses will allow the study team to determine whether differences between mine-exposed and reference areas have changed over time relative to baseline (e.g., if invertebrate densities have always different between the mine-exposed and reference area, and if that difference is not getting significantly larger or smaller, then it may be reasonably concluded there is no adverse mine-related effect on invertebrate densities in the exposed area). Consistent with the 2025 report, observations of bryophytes and other key habitat features will be considered in interpretation of the 2026 BIC data. Available historical data will be reviewed in an effort to determine whether changes in bryophyte presence/abundance/density have occurred over time.
38	AE#26	Although most endpoints do not show consistent trends, organism density has been significantly lower than baseline since 2016, suggesting a persistent change that is not fully explained by interannual variability.	It may be helpful to further consider the long-term decline in organism density and its relevance. Strengthening the connection between shifts in feeding groups and potential	Please see the responses to Intervenor Comments AE#24 and AE#25, above.

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		Relying on the lack of clear trends and FFG-based explanations may downplay a persistent change in the benthic community. Additionally, increased nematodes and collector-gatherers with reduced filterers suggests a shift toward fine organic matter dominance and altered habitat function, which may reflect chronic influence. **References** **Document Name**: Appendix E.9.2 Mary River Project 2025 Core Receiving Environmental Monitoring Program Report **Section**: 3.1.3.2 CLT1 Upper Main Stem **Page**: 89-90 of 977	sediment or organic changes could also improve interpretation. Revisiting the overall weight of evidence may help clarify whether effects are ongoing or temporary.	
39	AE#27	Three consecutive years (2023–2025) of reduced benthic invertebrate density at Camp Lake (JL0), with MODs exceeding the CESBIC, suggest a persistent and potentially ecologically meaningful pattern rather than normal variability. Although richness and community composition remain stable, sustained declines in density may indicate reduced productivity or emerging stress that is not fully reflected in structural metrics. Attributing this pattern primarily to interannual variability or habitat fluctuations may minimize its significance, as the consistency and magnitude of the deviation exceed expected natural variation. Moreover, stable richness and composition do not preclude early-stage impacts, as changes in density can precede detectable shifts in community structure. As such, the conclusion that structural integrity is maintained may overlook a developing effect that requires further consideration. "*Ecologically meaningful differences for density suggested a more recent and consistent decrease relative to baseline, with MODs outside the CESBIC of ±2 SDBASELINE for the last three consecutive years (2023 to 2025). Conversely, MODs outside the CESBIC for Simpson's Evenness were infrequent). The lower invertebrate densities in 2023 to 2025 relative to baseline may reflect variability in littoral productivity or water level fluctuations (e.g., habitats that are wetted one year may be dry the next, reducing the available habitat area for benthic invertebrates). Importantly, observed changes in organism densities relative to baseline were not accompanied by declines in taxonomic richness or major shifts in community composition, indicating that overall structural integrity of the BIC was maintained*." **References** **Document Name**: Appendix E.9.2 Mary River Project 2025 Core Receiving Environmental Monitoring Program Report **Section**: 3.3.4 Benthic Invertebrate Community (JLO)	The repeated density exceedances should be viewed as a potential early signal of change and further evaluating their persistence and implications within the overall interpretation.	The reduced invertebrate densities in Camp Lake in 2023 to 2025 relative to baseline triggered a Moderate Risk Response, based on the thresholds specified in the Revision 2 AEMP study design. Next steps for 2026 included continued monitoring of the BIC in Camp Lake, use of a WOE approach that considered sediment quality, completion of Before-After-Control-Impact (BACI)-style analyses for BIC data (baseline to present) and continued consideration of supporting BIC endpoints (e.g., functional feeding groups) and habitat data to interpret results. The BACI-style analyses will support a more robust statistical evaluation of potential mine-related effects (versus natural differences between areas/over time). Additionally, consideration of the 2026 data will inform whether the patterns in invertebrate densities observed from 2023 to 2025 are continuing; this information will then help inform next steps for monitoring and mitigative or management actions.

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40	AE#28	Across mine-exposed lakes, repeated differences in fish endpoints, including length frequency distributions (LFDs), size structure, and condition, have triggered Low or Moderate Risk Responses; however, these findings are generally interpreted as natural variability in the absence of a clearly integrated weight-of-evidence assessment. Fish results are not consistently evaluated alongside supporting exposure and response lines of evidence, such as water quality trends, productivity, and benthic invertebrate community (BIC) results, which limits confidence in conclusions that adverse mine-related effects are absent. The assessment also relies heavily on critical effect size (CES) thresholds to discount statistically significant changes, even though repeated or directional trends over multiple years may signal longer-term ecological change that warrants further investigation. **References** **Document Name**: Appendix E.9.2 Mary River Project 2025 Core Receiving Environmental Monitoring Program Report **Section**: 3.3.5 - Camp Lake, 4.4.5 - Sheardown Lake NW, 4.5.5 - Sheardown Lake SE, 5.4.5 - Mary Lake **Page**: 137-297 of 977	An integrated, lake-specific weight-of-evidence approach is not clearly articulated, with limited linkage between fish endpoints and supporting lines of evidence such as water quality, productivity, sediment, and benthic invertebrate community (BIC) trends, making it difficult to evaluate potential causal pathways. Clarification is requested on the rationale for not incorporating or reconciling multiple metrics that show consistent or repeated changes across years within the overall interpretation. Similarly, it is not clear how fish endpoints have been evaluated within a long-term context (e.g., relative to baseline or reference conditions) to determine whether observed differences are stable, directional, or increasing over time. Repeated exceedances of critical effect size (CES) thresholds and statistically significant changes continue to be interpreted largely on an annual basis, despite long-term data indicating potential patterns that warrant greater consideration of their cumulative and temporal significance.	The "Next Steps for 2026 CREMP Monitoring and Reporting" presented in Table 6.1 of the 2025 CREMP report included consideration of incorporating Before-After-Control-Impact (BACI)-type analysis of fish health endpoints (e.g., condition) to evaluate changes between mine-exposed and reference areas over time. This approach is more robust in that it provides an indication of whether a given endpoint has always differed between mine-exposed and reference areas (e.g., have near-shore fish from mine-exposed lakes always been larger relative to reference fish, even during baseline?) and whether that difference between areas has been growing larger or smaller over time (e.g., are the near-shore fish from the mine-exposed lakes getting larger over time, while reference fish are staying roughly the same size?). This approach, along with a more fulsome integration of water and sediment quality and productivity data into the interpretation of the fish results for 2026, will help clarify longer-term patterns in the data, as well as potential mine-related effects and causal pathways. Additionally, the Revision 3 AEMP study design that is being implemented for the first time in 2026 includes updated TARP Risk Response Thresholds (i.e., relative to Revisions 1 and 2, which were implemented in 2024 and 2025, respectively) that include consideration of results from consecutive studies.
41	AE#29	Camp Lake shows persistent biological responses, including Moderate Risk Responses for LFDs, a Low Risk Response for condition, and a Moderate Risk Response for BIC density; however, the fish effects interpretation does not clearly integrate these related endpoints. Post-2020 gill-net CPUE remains elevated relative to earlier years, while productivity and BIC results do not provide a clear explanation for the increase. Nearshore fish were smaller, had a narrower size distribution, and had lower condition relative to baseline, which may indicate unresolved food-web or competition-related changes. **References**	Integrate BIC density, nutrient and productivity patterns, and fish size and condition results to determine whether food limitation, competition, or other trophic mechanisms are contributing to the observed fish responses in Camp Lake. Assess whether elevated post-2020 CPUE reflects a sustained change in fish abundance, distribution, behaviour, habitat use, or sampling catchability. Use long term trend and	The 2026 CREMP report will provide an interpretation of fish endpoints for Camp Lake that considers potential influences of food availability and food web interactions (e.g., based on invertebrate densities, aqueous concentrations of nutrients, primary productivity, etc.). To the extent possible, longer-term patterns in CPUE will be assessed quantitatively to support understanding of how current (2026) conditions compare to baseline conditions.

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		Document Name: Appendix E.9.2 Mary River Project 2025 Core Receiving Environmental Monitoring Program Report **Section**: 3.3.5 Fish Population **Page**: 137-149 of 977	before and after analysis for Camp Lake BIC and fish endpoints to determine whether recent changes represent a persistent shift from baseline conditions.	
42	AE#30	The report concludes that sedimentation rates at Sheardown Lake NW fall within the range observed in other Arctic lakes; however, this comparison alone does not establish whether these conditions are influenced by mining or industrial activities, particularly in the absence of a local reference lake (e.g., Reference Lake 3 used elsewhere in the CREMP framework). While reported sedimentation rates fall within published Arctic ranges, this comparison may not fully reflect site-specific conditions. Lakes referenced in the literature may not be subject to the same combination of potential influences present at Sheardown Lake NW, including mine related disturbance and episodic turbidity events (e.g., rainfall driven backflow). The report presents multiple lines of evidence, including elevated sedimentation at sensitive spawning habitat (SHAL2), increasing long-term trends during the open water period, and early benthic community responses, that together suggest increasing sedimentation pressure. Reliance on comparisons to regional ranges minimize these site specific and temporal indicators of change. Similarity to Arctic lake ranges does not necessarily demonstrate absence of impact, particularly where sedimentation rates are increasing and affecting sensitive receptors. **References** **Document Name**: Appendix E.9.3 Lake Sedimentation Monitoring Program Report **Section**: 3.1.1 Spatial Comparisons for the 2024 to 2025 Ice Cover and Open Water Periods **Page**: 34 of 231	The proponent should provide a clear, weight-of-evidence determination of whether the observed increases in sedimentation at SHAL-2 represent a project-related effect, including consideration of spatial patterns (e.g., contrast with SHAL-1), temporal trends (2014 vs. 2025), and observed plume behaviour. The current reliance on regional comparisons does not adequately address site-specific causation. Please also refer to comment 37 above. Given the reliance on regional comparisons, the proponent should clarify whether establishing sedimentation reference conditions at Reference Lake 3 was considered.	The results of the 2026 LSMP report will be summarized and interpreted in the broader context of the 2026 CREMP report results. The interpretation will include consideration of spatial patterns of sedimentation within Sheardown Lake Northwest, temporal patterns, and effects of heavy precipitation events (e.g., backflow and plumes of turbid water).
43	AE#31	In April 2025, 5 new standpipes were installed, to replace wells that were damaged (due to frost jacking) or incorrectly installed (i.e., no bentonite seal) in the monitoring well network. Two wells were installed at the Landfill Facility (LF), and three at the Hazardous Waste Berm (HWB) Facility. However, of the five new wells, only two were able to be successfully monitored, as three wells were dry/frozen during the August sampling event. Both of the new wells installed at the LF were dry/frozen. WSP noted that this was likely due to one of the following: (1) the well screen being installed above the water table, (2) the screen being installed too deep in the permafrost, or (3) the wells being sampled too late in the season (i.e., after the shallow groundwater had already frozen). As ice was observed in the bottom of new standpipe well MS-LF- 25-01, it was determined that groundwater would have likely been present in the well if sampling had occurred earlier in the season (P. 9). Given that both new LF wells were dry/frozen, and there is limited monitoring downgradient of the HWB Facility, the newly-installed wells provided limited value in successfully	• Future Annual Reports should clearly identify how the subsequent year's monitoring program incorporates lessons learned from the previous monitoring year, including adjustments made to optimize data collection and program effectiveness. The integrity of the well monitoring network is an interannual concern that needs to be addressed. • Reevaluate the groundwater monitoring schedule to determine whether additional	Baffinland commits to including a summary of previous annual groundwater monitoring reports within future annual groundwater monitoring reports, including key findings and recommendations. Based on available thermistor data from other locations at the Project, groundwater sampling in late-August/early-September occurs concurrently with maximum active layer thickness. Thermistor data installed at the Landfill Facility in 2025 will be included in future annual monitoring reports to demonstrate this. Baffinland will provide a review of the groundwater monitoring well network in 2026, to be included in the annual groundwater monitoring report, including groundwater monitoring well network horizontal and vertical coverage and construction details, specifically for northern environments. The downgradient wells of the HWBs are sufficient to detect potential change

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		tracking down gradient migration of contaminants of potential concern (CoPC) exceedances in source areas, and replacing compromised wells in the monitoring network. Additionally, only one well is located downgradient of the HWB facility (MS-HWB-25-01), which was newly installed in 2025. It was unclear why no other wells were installed downgradient of the facility (i.e., between the HWB and Camp Lake), especially given that source area CoPC exceedances had been documented that had not been attributed to background conditions (nitrate, nitrite, naphthalene, fluoride, copper). There is also no monitoring downgradient of well HWB-KP22-04, where high nitrate concentrations were detected in 2025. **References** **Document Name**: Appendix E.11 – 2025 Groundwater Monitoring Report **Section**: 3.1 – New Standpipe Well Install **Page**: 8-9 of 922	or earlier seasonal monitoring events are warranted, to improve sampling success at newly installed wells, particularly where wells were frozen or dry during the 2025 monitoring program. • Strengthen the groundwater monitoring network downgradient of the HWB facility to ensure effective detection and tracking of contaminants of potential concern (CoPCs). This should include: ○ An assessment of whether the current well network provides sufficient downgradient spatial coverage between the HWB facility and Camp Lake, to reliably track downgradient migration; ○ An evaluation of the need for additional downgradient wells between the facility and Camp Lake; and ○ Implementing targeted monitoring to track plume migration from identified areas of elevated concentrations (e.g., vicinity of HWB-KP22-04, where high nitrate concentrations were observed). • Where additional downgradient monitoring wells are not installed/proposed, Baffinland should provide clear rationale. This justification should be supported by plume delineation, hydrogeological characterization, and monitoring objectives.	within the shallow active layer groundwater at the facility. The aquatic effects monitoring program in Camp Lake provides a review of parameters that may be associated with Infrastructure.
44	AE#32	BIM notes that surface water quality data from monitoring station MS-MRY-09 collected between 2020 and 2024 (n = 71) were used to develop concentration-based source terms representing both upslope runoff from undisturbed areas and runoff derived from overburden within the Pit. However, no rationale is provided for restricting the dataset to this time period. It is unclear	Clarify the rationale for selecting only the 2020–2024 dataset to develop source terms. Indicate whether additional historical data are available for MS-MRY-09 and, if so, explain why they were not incorporated. If no additional	The full available dataset for MS-MRY-09 representing the current monitoring location was used to develop the source term. This dataset included 71 operational water quality samples collected over five years from 2020 to 2024, providing a reasonable multi-year basis for source-term development. Earlier MS-MRY-09 data are available; however, those data represent a different monitoring location and were therefore not considered appropriate for inclusion in the current

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		whether additional historical data are available for this station or why a longer-term dataset was not used to better capture baseline conditions and interannual variability. **References** **Document Name**: Appendix E.10.1 Open Pit Water Balance and Water Quality Report – Operations and Early Closure **Section**: 3.2.1.1 Concentration-Based Source Terms **Page**: 27 of 355	data are available, please confirm this. For future reporting, provide justification for dataset selection and consider incorporating longer-term datasets, where available, to improve representativeness and robustness of source term development.	source-term development. Baffinland will continue to use the best available and most representative data for future source-term development and will incorporate longer-term datasets where they are available, comparable, and appropriate for the source term being developed.
45	AE#33	BIM notes that water quality data collected from collection ditches and runoff locations near the Project's WRF from 2022 through 2024 were used to develop concentration-based source terms representing runoff from non-AG waste rock and construction fill exposed within the Pit. However, no rationale is provided for restricting the dataset to the 2022–2024 period. It is unclear whether additional historical data are available or why a broader dataset was not used to better characterize baseline conditions and variability in runoff quality. **References** **Document Name**: Appendix E.10.1 Open Pit Water Balance and Water Quality Report – Operations and Early Closure **Section**: 3.2.1.1 Concentration-Based Source Terms **Page**: 28 of 355	Clarify the rationale for selecting only the 2022–2024 dataset to develop source terms. Indicate whether additional historical data are available for these locations and, if so, explain why they were not incorporated. If no additional data are available, please confirm this. For future annual reporting, provide justification for dataset selection and consider incorporating longer-term datasets, where available, to improve the representativeness and robustness of source term development.	The 2022–2024 dataset was used because it represents the best available monitoring data for characterizing runoff from non-AG waste rock. The dataset included 152 operational water quality samples collected over three years, providing a reasonable multi-year basis for source-term development. Earlier data were not incorporated because datasets prior to 2022 included ARD-affected and low-pH seep conditions near the WRF. Limiting the dataset to 2022–2024 ensures the assessment focuses on the water quality signature of non-AG material without interference from legacy acid-generating signatures. Baffinland will continue to use the best available and most representative data for future source-term development. Where data filtering or exclusion is applied in future reporting, Baffinland will document the basis for that filtering to support transparency in source-term development.
46	AE#34	BIM notes that dissolved metals concentrations were used to represent total metals concentrations, as total metals were not included in the analytical suite for the humidity cell tests. This approach may underestimate total metals concentrations and is not conservative, as total metals are typically expected to equal or exceed dissolved concentrations due to the presence of particulate-bound metals. No rationale is provided for this methodological choice. **References** **Document Name**: Appendix E.10.1 Open Pit Water Balance and Water Quality Report – Operations and Early Closure **Section**: 3.2.1.2 Leaching Rate-Based Source Terms **Page**: 29 of 355	Provide justification for using dissolved metals as a surrogate for total metals in the development of source terms, including an assessment of the potential for underestimation and associated implications for predictions. Clarify whether any correction factors or supporting datasets were considered to address this limitation. For future programs, include total metals in the analytical suite for humidity cell tests, or apply a scientifically justified method to estimate total concentrations, to ensure a more conservative and representative assessment.	Baffinland notes that the source-term datasets used for the water quality model reflect the analytical fractions available from the applicable monitoring and test programs. Some datasets included both total and dissolved metals, while others included only total metals or only dissolved metals. Where only total metals data were available, total concentrations were conservatively used to represent dissolved concentrations. This approach may overestimate predicted dissolved metal concentrations, particularly for parameters that are commonly associated with suspended sediment, such as aluminum and iron. Conversely, where only dissolved metals data were available, dissolved concentrations were used to represent total concentrations, which may underestimate total metals because total concentrations are generally expected to equal or exceed dissolved concentrations. The only datasets limited to dissolved metals were the humidity cell test datasets. Dissolved metals are the standard analytical output for this test. Notably, humidity cell tests are inherently conservative because they are designed to maximize mineral exposure under optimized laboratory conditions to determine unconstrained primary chemical weathering rates.

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				Since the development of the source terms for this water quality model, Baffinland has begun collecting paired total and dissolved metals data at key operational monitoring locations to support future source-term refinement, including water quality sampling around the toe of the WRF and associated ditches. In addition, field barrel testing was implemented in 2026 to further support source-term refinement, with both total and dissolved metals being analyzed. These paired datasets, together with additional source-term development scheduled for 2027, will be used to improve existing source terms during future model updates.
47	AE#35	Table 3.7 presents the water quality model scenarios, which combine climate conditions (average, dry, and climate change) with either expected or upper case source terms. However, none of the scenarios evaluate a combined worst-case condition (e.g., climate change conditions paired with upper case source terms). The current scenario set therefore does not appear to assess the full range of potential extremes, particularly where higher loading conditions could coincide with climate driven changes in hydrology. This limits the ability to evaluate whether predicted water quality outcomes remain protective under plausible worst-case conditions. **References** **Document Name**: Appendix E.10.1 Open Pit Water Balance and Water Quality Report – Operations and Early Closure **Section**: 3.3 Water Quality Model Scenarios **Page**: 34 of 355	Clarify how worst-case conditions have been evaluated in the absence of a scenario combining climate change conditions with upper case source terms. If such an assessment has not been completed, provide justification for its exclusion and discuss the implications for the robustness of model predictions. For future modelling and reporting, include a scenario (or sensitivity analysis) that evaluates combined worst case conditions (e.g., climate change plus upper case source terms) to ensure that the full range of potential impacts is characterized and that predictions remain protective under extreme conditions.	As summarized in Table 3.7 of the Pit Water Quality Model Report, the worst-case climate change scenario (SSP5-8.5) was evaluated using expected case source terms. Comparison of results from the average climate, dry climate, and SSP5-8.5 scenarios indicated that climate change influenced predicted water quality; however, its impact was generally less when compared against the water quality from the Dry-climate scenario. This outcome reflects the modelled reduction in pit inflow and discharge volumes under dry climate conditions, resulting in less dilution of constituents released from exposed pit wall materials and runoff source areas and, consequently, higher predicted concentrations. Within the assessment framework, the Dry Climate + Upper Case Source Terms scenario was used to represent a conservative bounding case for evaluating potential water quality conditions. While additional combinations of climate and source-term assumptions could be evaluated through alternative scenario analyses, the current assessment incorporates conservatism in both climate and source-term characterization. Future refinements to the modelling approach may consider additional combinations of climate and source-term assumptions to further assess the range of potential outcomes.
48	AE#36	BIM notes that wall runoff quality was represented using water quality data collected from 2020 to 2025 at the 570 Sump. However, for the expected case scenario, pH and alkalinity appear to be based on a single minimum observed pH value (3.49), representing acidic conditions associated with PAG rock weathering. The reliance on a single extreme value for pH (and corresponding alkalinity assumptions) is not clearly justified and does not appear to reflect typical or central tendency conditions expected for an "expected case" scenario. This approach may bias the representation of wall runoff quality and does not clearly distinguish between expected and worst case conditions. **References** **Document Name**: Appendix E.10.1 Open Pit Water Balance and Water Quality Report – Operations and Early Closure **Section**: 3.4 Water Quality Model pH Predictions **Page**: 35 of 355	Clarify the methodology used to derive pH and alkalinity for the expected case scenario, including the rationale for relying on a single minimum value rather than a summary statistic (e.g., median or mean) from the available 2020–2025 dataset. Discuss how this approach aligns with the intended definition of "expected case" conditions. For future reporting and modelling updates, provide clear justification for parameter selection and consider using statistically representative values (with separate evaluation of extreme conditions) to better distinguish between expected and worst-	Baffinland confirms that the pH value of 3.49 was selected as a conservative input for PAG-influenced wall runoff, based on the lowest observed pH from the available 570 Sump dataset. This value was intentionally used to avoid underestimating potential acidity in the pit water quality model. Although this value represents a conservative low-pH assumption for PAG-influenced wall runoff, the model results indicated that predicted pH remained compliant after mixing under the assessed scenarios. This conservative assumption does not affect the conclusions of the assessment, as predicted pH remained compliant under the assessed scenarios. Future revision of this source term may be considered as part of future model updates, where supported by additional data or analysis.

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			case scenarios and improve transparency and robustness of model inputs.	
49	AE#37	BIM notes results are presented for the following scenarios: Average – Expected Case, Average – Upper Case, Dry – Upper Case, and Average – Sensitivity Expected Case for the water quality model. However, Table 3.7 identifies an additional Climate Change – Expected Case scenario, which is not included in the results discussion or figures/tables provided. As this is the only scenario explicitly intended to evaluate climate change conditions (including altered precipitation patterns and higher inflow volumes), its omission from the results limits the ability to assess potential effects under future climate conditions. No rationale is provided for excluding this scenario from the results presentation. **References** **Document Name**: Appendix E.10.1 Open Pit Water Balance and Water Quality Report – Operations and Early Closure **Section**: 3.5 Water Quality Model Results **Page**: 36 of 355	Clarify the rationale for not discussing the Climate Change – Expected Case scenario alongside the other scenarios presented in the results section. Provide a summary interpretation of how results under climate change conditions compare to the other modelled scenarios and whether they influence conclusions regarding predicted water quality and compliance with licence criteria. For future annual reporting, ensure consistent discussion of all modelled scenarios, including those assessing climate change, to support a comprehensive and transparent evaluation of model results.	Baffinland confirms that the Climate Change – Expected Case scenario was completed as part of the pit water quality model. This scenario evaluated projected climate change conditions under SSP5-8.5, which represents the most extreme climate change scenario. Key findings from this scenario were discussed in the body of the report, with supporting results presented in Appendix C and Appendix D. Comparison of the Climate Change – Expected Case with the other modelled scenarios indicated that climate change conditions affected predicted water quality; however, the effect was generally less than under the Dry-climate scenario and marginal relative to the Average – Upper Case and Dry – Upper Case scenarios. These bounding scenarios were discussed and charted in the body of the report to focus the reader on the scenarios most relevant to interpreting predicted water quality and compliance. Future reporting will include climate change scenario results more consistently in the main report.
50	AE#38	The proponent indicates that climate change conditions result in increased concentrations due to higher inflow volumes, increased mass loadings, and enhanced geochemical reaction rates. While increases in concentrations are observed under the Climate Change – Expected Case scenario relative to the Average – Expected Case scenario, these increases are described as minor compared to those observed under dry climate conditions. The assessment identifies the Dry – Upper Case scenario as representing worst-case conditions due to reduced dilution and elevated concentrations under low-flow conditions. However, the assessment does not include a scenario that combines climate change conditions with Upper Case geochemical source terms. Given that climate change projections indicate increased temperature, precipitation, and water-rock interaction, which are expected to increase mineral reaction rates and mass loadings, the absence of a combined high climate change and high geochemical loading scenario introduces uncertainty in whether the full range of potential future conditions has been adequately bounded. **References** **Document Name**: Appendix E.10.1 Open Pit Water Balance and Water Quality Report – Operations and Early Closure **Section**: 3.5 Water Quality Model Results **Page**: 39 of 355	Evaluate a combined scenario incorporating climate change conditions (e.g., a high emissions pathway) and Upper Case geochemical source terms to confirm that the current assessment bounds potential future water quality conditions. Alternatively, provide a clear, technically supported rationale demonstrating why such a combined scenario is not considered plausible or would not result in higher concentrations than those predicted under the Dry – Upper Case scenario.	As discussed under AE#35, the worst-case climate change scenario (SSP5-8.5) was evaluated using expected case source terms, and a comparison of results from the average climate, dry climate, and SSP5-8.5 scenarios indicated that while climate change impacted water quality, its impact was generally less when compared against the water quality from the Dry-climate scenario. This outcome reflects the modelled reduction in pit inflow and discharge volumes under dry climate conditions, resulting in less dilution of constituents released from exposed pit wall materials and runoff source areas and, consequently, higher predicted concentrations. Within the assessment framework, the Dry Climate + Upper Case Source Terms scenario was used to represent a conservative bounding case for evaluating potential water quality conditions. While additional combinations of climate and source-term assumptions could be evaluated through alternative scenario analyses, the current assessment incorporates conservatism in both climate and source-term characterization. Future refinements to the modelling approach may consider additional combinations of climate and source-term assumptions to further assess the range of potential outcomes.

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51	AE#39	It was unclear which damaged or compromised wells in the existing monitoring well network each of the 5 new wells installed in 2025 were intended to replace. Although the purpose of a new well was noted in the text of the report in some instances (e.g., MS-HWB-03 was noted to compare to well HWB-KP22-06, which did not have a bentonite seal), it would be useful if this information could be summarized in a table (or added to Table 2), for reviewer clarity. Additionally, Baffinland should specify whether any future work is planned to fill the gaps that the 3 dry/frozen wells were unable to address. **References** **Document Name**: Appendix E.11 – 2025 Groundwater Monitoring Report **Section**: 3.1 – New Standpipe Well Install **Page**: 8-9	Baffinland should clarify which damaged or compromised well from the existing monitoring network each of the 5 new wells installed in 2025 was intended to replace, for reviewer clarity. Additionally, Baffinland should specify how/when additional work will be completed to fill the gaps that the 3 dry/frozen wells were unable to address. This information should also be incorporated into future annual reports to provide greater clarity as to how the groundwater monitoring network is evolving.	The five newly installed groundwater monitoring wells were installed as follows: • MS-LF-25-01 (frozen in 2025): Installed downgradient of the Landfill Facility to fill a horizontal data gap resulting from existing groundwater monitoring well coverage and dry and/or frozen groundwater monitoring wells in other locations downgradient of the Landfill Facility • MS-LF-25-02 (dry/frozen in 2025): Installed in proximity of LF-KP23-03 (dry in 2024 and 2025), downgradient of the Landfill Facility • MS-HWB-25-01 (sampled in 2025): Installed downgradient of the Hazardous Waste Berm (HWB) facility, in proximity to MS-HWB-GW6 (dry in 2024 and frozen in 2025) • MS-HWB-25-02 (dry in 2025): Installed in proximity to HWB-KP22-05 (sampled in 2025) • MS-HWB-25-03 (sampled in 2025): Installed upgradient of the HWB Facility, in proximity of MS-HWB-GW9 (no longer exists) and HWB-KP22-06 (dry in 2024 and sampled in 2025) Dry and Frozen wells do not conclude that a new well is required; rather, they provide data that the well location during the period of monitoring in mid-August, which experiences the most significant active layer zone, does not exhibit shallow subsurface active layer flows sufficient to characterize. This is expected across many locations at the project.
52	AE#40	WSP provided a conceptual site model (CSM) in cross section, illustrating seasonal variation in groundwater migration and drainage to Sheardown Lake SE from the Landfill Facility, and active layer thickness and depth to permafrost (Figure 1 – P. 31). It was unclear why a similar figure illustrating a conceptual model of groundwater migration/drainage from the Hazardous Waste Berm (HWB) Facility to Camp Lake was not prepared/provided or discussed, particularly given that several CoPC exceedances were detected in source wells associated with the HWB. Further, it was unclear why drainage from the LF Facility to Sheardown Lake NW was not conceptually modelled/illustrated, given that Figure D (P. 50) estimated that groundwater from the LF Facility is primarily directed to the west to Sheardown Lake NW. **References** **Document Name**: Appendix E.11 – 2025 Groundwater Monitoring Report **Section**: Figure 1 **Page**: 31	BIM should provide a conceptual site model (i.e., cross sections) illustrating groundwater migration/drainage and active layer thickness/depth to permafrost table from the Hazardous Waste Berm Facility to Camp Lake, similar to the CSM provided for the LF Facility to Sheardown Lake SE in Figure 1. Similarly, a CSM illustrating these characteristics should also be provided to illustrate the hydrogeological regime and groundwater migration from the LF Facility to Sheardown Lake NW.	The illustrative conceptual site model (CSM) provided for the Landfill Facility is not a detailed CSM as it does not incorporate actual soil lithology, borehole and groundwater monitoring well profiles, groundwater results, or active layer thicknesses. The illustrative CSM provided for the Landfill Facility is provided to conceptually illustrate (1) the cross-sectional, topographic and subsurface profile of the Landfill Facility, including Sheardown Lake NW (i.e., the extent of the groundwater monitoring well network); and (2) generic geological features typical to northern, Arctic environments (specifically the active layer in relation to Sheardown Lake NW) to provide a illustrative context, in addition to a CSM narrative, to discuss groundwater flow (including preferential pathways) and potential contaminant migration. An illustrative CSM was not provided for the HWB Facility as the area is flat and unremarkable from a groundwater perspective, with Camp Lake being several hundred metres away, and thus not necessitating an illustration beyond the narrative CSM to discuss the results. **Baffinland considers this item (AE#40) closed.**
53	AE#41	Photo A-4 (Appendix A) indicates that groundwater sampled from well LF-KP22-05 (reference station upgradient and adjacent to the LF) was yellow and slightly opaque, and that brown sediment with an apparent "oil slick" was noticed at the bottom of the Low-Density Polyethylene	BIM should clarify why observations at LF-KP22-05 were not discussed in the report, and indicate whether further investigation will be	Photo A-4 (Appendix A) of the 2025 Annual Groundwater Monitoring Report includes an observation made in the field. Analytical results for the groundwater sample indicate non-detectable concentrations of petroleum hydrocarbons fractions 1 through 4 (PHC F1-F4), volatile

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		(LDPE) tubing used for well purging. However, this observation was not discussed in the groundwater monitoring report. **References** **Document Name**: Appendix E.11 – 2025 Groundwater Monitoring Report **Section**: Appendix A **Page**: A-2 (P. 54 of 922)	undertaken to identify the source of the oily substance in this well.	organic compounds (VOCs), withholding a mild detection of acetone (three to four times the laboratory reportable detection limit [RDL] and approximately three orders of magnitude less than the applicable guideline), and polycyclic aromatic hydrocarbons (PAHs). No further investigation is warranted. **Baffinland considers this item (AE#41) closed.**
54	AE#42	Potential evidence of open talik formation was noted beneath Murial Lake (along the Tote Road), which WSP states is of a similar size to Sheardown Lake. WSP noted that an open talik could connect the subpermafrost groundwater to suprapermafrost groundwater. It was unclear if or how BIM proposed to evaluate whether a talik had formed beneath Sheardown (or Camp) Lakes, and discussion of the potential effects of talik formation beneath these lakes on the hydrogeological characterization of the site was limited (e.g., discussion of changes in vertical hydraulic gradients, conceptual pathway from shallow groundwater regime to deeper groundwater). **References** **Document Name**: Appendix E.11 – 2025 Groundwater Monitoring Report **Section**: 6.1 – Site Characteristics **Page**: 28	BIM should clarify whether any additional investigations will be conducted to determine if a talik has formed beneath Sheardown Lake or Camp Lake, for example, whether any additional thermistor beads will be installed near these lakes to track active layer thaw.	Baffinland currently monitors shallow, active layer groundwater in the vicinity of Sheardown Lake NW as part of the groundwater monitoring program, as well as aquatic effects in Sheardown Lake NW as part of the Core Receiving Environment Monitoring Program (CREMP). To date, shallow groundwater migration from the Landfill Facility has been demonstrated to be limited, as documented by limited active layer thickness and seasonal longevity of the active layer, as well as dry and frozen groundwater monitoring wells. Additionally, current groundwater analytical results do not indicate downgradient impacts to shallow, active layer groundwater. Given this, investigation of a potential talik formation is not warranted, and such potential investigation may itself present a preferential pathway to deeper formations. Furthermore, the groundwater results are discussed in the context of a potential talik and, should it be warranted, would be addressed/investigated. **Baffinland considers this item (AE#42) closed.**
55	AE#43	The 2025 Groundwater Monitoring Report provides hydraulic conductivity values (in m/s) for the aquifer at the LF and the HWB, with values corresponding to fine/coarse sand, indicating that the media has relatively high permeability. However, an estimation of how long it may take for impacted groundwater from the facility's source areas to migrate to Camp/Sheardown Lakes (NW and SE) was not evaluated or discussed. This would be helpful for understanding plume migration timelines, and the risks associated with these facilities, particularly given that there are CoPC exceedances in source areas of these facilities. Given that the hydraulic conductivity of groundwater at the HWB facility was estimated to be as high as 2 x 10-4 m/s, groundwater from the source area could conceptually reach Camp Lake (which is ~450 m from the source area) in as little as 26 days, under flowing (summer) conditions. This information should be discussed and provided in the annual groundwater monitoring report, for risk evaluation completeness. **References** **Document Name**: Appendix E.11 – 2025 Groundwater Monitoring Report **Section**: 4.3 – Single Well Response Testing Results	BIM should discuss and evaluate timelines for groundwater to migrate from the source areas of LF and HWB facilities to Sheardown Lake (NW and SE) and Camp Lake, respectively, to evaluate the risk that source area CoPC exceedances pose to downgradient surface waters.	Baffinland commits to utilize measured hydraulic gradients, previously measured horizontal hydraulic conductivities, and assumed porosity to determine average linear velocity of the shallow, active layer groundwater regime in future annual monitoring reports. However, Baffinland will not determine travel times of potential plume fronts to Camp Lake as any contaminant plume present will be subject to dilution, natural attenuation, and retardation factors, despite groundwater advection velocity. The HWB Facility as an area is flat and unremarkable from a groundwater perspective. Baffinland will consider screening-level groundwater advective velocities/travel times, which we can be calculated from measured gradients, K and assumed/estimated effective porosity and evaluate skewing factors that may be required to account for in the initial exercise. Baffinland does not agree with QIA's assertion that groundwater has the potential to travel 400m within active layer conditions that are present at the Mary River Project.

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56	AE#44	The conceptual model shown in Figure 1 (P. 31) indicates that seeps may occur downgradient of the LF, toward Sheardown Lake NW. Seep locations downgradient of the LF have historically exhibited elevated dissolved copper concentrations (below the FIGQ AW-F guideline), suggesting a potential pathway for contaminant migration. However, the report does not clearly describe what control or mitigation options BIM has available should concentrations increase, exceed guidelines, or if additional seepage develops. **References** **Document Name**: Appendix E.11 – 2025 Groundwater Monitoring Report **Section**: Section 5.2; Figure 1 **Page**: 25, 31	BIM should describe the control and mitigation measures available to manage seepage downgradient of the LF and HWB facilities, including contingency actions if CoPC exceedances are identified or if new seepage pathways develop. This should include how seep monitoring results are linked to management decisions within the existing framework.	The landfill is a non-hazardous waste containment facility and does not have a requirement or expectation of containing surface water, groundwater or seeps that potentially interact with the facility. The Surveillance Network Program (SNP) is the licenced program that evaluates analytes under water licence for potential impacts associated with the landfill. It should be noted that results do not exceed Part F Table 7 criteria. The Hazardous Waste Berm Facilities are designed to withhold and contain water to eliminate seeps utilizing engineered liner installations. Annual geotechnical inspections and regular berm inspections are utilised to monitor the performance of Hazardous waste berms and potentially designate them not suitable for use should there be observations of potential liner punctures or seeps. **Baffinland considers this item (AE#44) closed.**
57	AE#45	Figure D and E provide site plans of the LF and HWB facilities, indicating groundwater elevations and inferred flow direction (P. 50, 51), however, the site plans did not indicate that upgradient reference well MS-HWB-GW-REF2 was dry in 2025. Further to this, based on the report text and attached figures, it was difficult to determine (and keep track of) which wells were in good condition and which were successfully sampled (i.e., without data quality concerns) in 2025, and what the period of record is for each well. Concentrations over time were not summarized in a table, and no CoPC trend analysis was provided (although a limited discussion of comparisons with historical results was provided in Sections 5.2 and 5.3). For clarity and ease of review, it would be useful if BIM prepared and presented a table summarizing the status of each well, including the year it was installed, whether it was sampled in 2025 (and any data quality issues/flags), and what wells could not be sampled (and for what reason). While Table 7 (P. 18) indicates which groundwater samples had CoPC exceedances, it does not give an indication of how many downgradient wells were actually able to be sampled. A clearer display of which wells were usable and in good repair in 2025 would help to more clearly evaluate whether the existing well network is temporally sufficient. **References** **Document Name**: Appendix E.11 – 2025 Groundwater Monitoring Report **Section**: Figure D and E **Page**: 50, 51	In future iterations of the annual groundwater report, BIM should provide a table summarizing the status of each well on site, including what the year each well was installed, whether it was sampled in 2025 (and any data quality issues/flags), and what wells could not be sampled (and for what reason). An indication of the period of record for each well should also be provided. BIM should also clarify why no trend analysis (or discussion of trends) for key CoPCs (particularly CoPCs exceeding guidelines in facility source areas in 2025) was conducted as part of their groundwater monitoring report. This should be included in future iterations of annual groundwater reporting.	Figure E of the 2025 Annual Groundwater Monitoring Report correctly indicates that MS-HWB-GW-REF2 was dry in 2025. Table C (Appendix C) of the 2025 Annual Groundwater Monitoring Report summarizes the status of each groundwater monitoring well, including what year each groundwater monitoring well was installed, whether it was sampled in 2025 (and any data quality issues/flags), and what groundwater monitoring wells could not be sampled (and for what reason), albeit MS-HWB-GW-REF2 was not listed as dry in this table.

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58	AE#46	Appendix E.11 stated that "concerns have been previously raised about a potential liner leak in the northwest section of the HWB; as a result, this section is currently not being used to contain hazardous waste." (P. 12). It was unclear if BIM had a plan to repair this section of the HWB. **References** **Document Name**: Appendix E.11 – Groundwater **Section**: Background **Page**: 12	Baffinland should provide details on when and how the HWB liner leak will be repaired.	This comment is a repetition of comments in other regulatory fora, and as such, Baffinland considers this comment complete for the purposes of this report. Please refer to the attached Table 4 for more details. **Baffinland considers this item (AE#46) closed.**
59	AE#47	Figure D of Appendix E.11 presents the locations of groundwater monitoring wells at/around the Landfill Facility. The Mine Site Landfarm, located on the north side of the LF, is used for managing hydrocarbon-impacted soils. However, there do not appear to be any groundwater monitoring wells installed immediately downgradient (i.e., west) of the landfarm's footprint or its associated management pond, to track potential seepage migration towards Sheardown Lake NW. It was unclear why Baffinland had not installed any monitoring wells in this area. Further, Baffinland has indicated that the Milne Port Landfarm, which has been used to manage hydrocarbon-impacted soils, is currently at-capacity (as of 2019). It was unclear whether any groundwater monitoring has been conducted at this facility or in downgradient areas. **References** **Document Name**: Appendix E.11 – 2025 Groundwater Monitoring Report **Section**: Figure D **Page**: 50	Baffinland should clarify why there are no groundwater monitoring wells located downgradient (west) of the Mine Site Landfarm, where hydrocarbon-impacted soils are managed/stored. Additionally, Baffinland should clarify why there are no groundwater monitoring wells at or downgradient of the Milne Port Landfarm, where hydrocarbon-impacted soils have been managed, to monitor subsurface migration from the facility. Pending BIM's response, we recommend the addition of groundwater monitoring wells downgradient of the Mine Site and Milne Port Landfarms.	Please see the response to Intervenor Comment GGC#6, above. In addition to this, the landfarms are lined containment facilities that are inspected annually for signs of instability, liner concerns, and containment concerns. The design of the Facilities mitigates the potential for seeps from the Facilities. No seeps have been observed from the facility since the start of operations, and both facilities retain standing water and require discharge of the associated water under applicable licence criteria. **Baffinland considers this item (AE#47) closed.**
60	AE#48	Baffinland states that "certain explosives-related outer packaging and associated solid residuals have historically been managed by controlled burning in remote northern operations" No. 30 AE #14 (p. 4). **References** **Document Name**: Appendix E. 13.1 – Responses to Intervenor Comments on the 2024 QIA – NWB Annual Report for Operations **Section**: Comment No. 30 AE#14 **Page**: 4	Baffinland should clarify how these materials are currently dealt with at the Mary River Project.	Explosives-related outer packaging and associated solid residuals continue to be disposed of on-site by controlled burning. As previously communicated in Baffinland's Responses to Intervenor Comments on the 2024 QIA – NWB Annual Report for Operations, Comment No. 30 AE#14: Disposal of certain explosives-related outer packaging and associated solid residuals have historically been managed by controlled burning in remote northern operations. Natural Resources Canada's Explosives Regulatory Division requires that explosive outer packaging must be destroyed or disposed of so it cannot be reused, and noted that open-air burning is the industry standard disposal method for destruction of such packaging. **Baffinland considers this item (AE#48) closed.**

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Fish and Fish Habitat (F&FH)				
61	F&FH#1	"*The primary objectives of the 2025 Tote Road monitoring program were to assess the presence of fish, habitat quality, and upstream accessibility through installed culverts at fish-bearing sites. Monitoring of the seven sites remediated in winter of 2024 was conducted under the Tote Road Culvert Crossing Remediation Monitoring (TRCCRM) program. The results of the 2025 TRCCRM program are presented in NSC (2026). Results from the remaining Tote Road sites surveyed in 2025 are presented herein*." (Appendix C.3, s.2.2, p. 7). Why were monitoring results from the seven remediated crossings (CV-057, CV-059, BG-04, CV-001, CV-102, CV-106 and CV-216) not included in the Tote Road Fish Habitat Monitoring Report, or mentioned in the main report (Main Body, s.7.3.8, p. 45)? The North/South Consultants (2026) report was not found in the NWB review documents. It was provided by Baffinland on 26 June 2026, after several requests, but too late for review and incorporation into QIA's comment package. Absence of this information creates a gap in the 2025 Tote Road stream crossing monitoring information provided for review, and potentially in the long-term records. **References** **Document Title**: Baffinland Iron Mines 2025 Annual Report to QIA and NWB for Operations, Appendix C.3 Tote Road Fish Habitat Monitoring Report 2025 [NWB Registry: 260331 - 2025 QIA-NWB Annual Report for Ops - Appendix C.3 - Tote Road Fish Habitat Monitoring 2025 Annual Report_FINAL_reduced.pdf], **Section** 2.2 Fish habitat assessment **Page** 7 (pdf p. 12 of 451) **Document Title**: Baffinland Iron Mines 2025 Annual Report to QIA and NWB for Operations, Main Body [NWB Registry: 260331 - 2025 QIA-NWB Annual Report for Ops - As Sent.pdf], **Section** 7.3.8 Tote Road monitoring program **Page** 45 (pdf p. 65 of 94) **Document Title**: North/South Consultants Inc. (NSC). 2026. Tote Road Culvert Crossing Remediation Monitoring Fish and Aquatic Habitat. A report prepared for Baffinland Iron Mines Corporation. March 2026.	QIA requests Baffinland include all relevant material in Annual Report submission packages.	Baffinland acknowledges QIA's concern regarding the absence of monitoring results for the seven remediated crossings (CV-057, CV-059, BG-04, CV-001, CV-102, CV-106, and CV-216) from the 2025 Tote Road Fish Habitat Monitoring Report and the main report. Baffinland also notes that this is not a licenced monitoring program and is a Program Baffinland voluntarily reports through the QIA/NWB annual report from historical DFO authorizations that are no longer applicable. Monitoring of these excluded crossings was conducted under the separate Tote Road Culvert Crossing Remediation Monitoring (TRCCRM) program, which was established to satisfy DFO-specific regulatory requirements associated with the culvert remediation works completed. As a result, the monitoring results were documented and reported separately in North/South Consultants (2026) and were not duplicated within the Tote Road Fish Habitat Monitoring Report. To improve continuity of reporting, future Tote Road Fish Habitat Monitoring Reports will include a summary of monitoring results from crossings monitored under the TRCCRM program. This approach will provide a more complete record of stream crossing monitoring activities while avoiding duplication of detailed reporting.
62	F&FH#2	The report states that the sites confirmed as fish habitat have been monitored annually for the last 15 years whereas fishless sites have been monitored periodically, with the most recent monitoring having been conducted in 2019 and 2020, to confirm the continued presence of natural barriers to fish passage. The term "periodic monitoring" is not clearly defined, creating uncertainty in the frequency and consistency of inspections at fishless sites. Without a regular schedule, there is an increased risk that changes to natural barriers may go undetected;	Rather than monitor the fishless sites periodically to ensure the presence of natural barriers to fish passage, the proponent should set up monitoring at regular 5-year intervals. A regular monitoring program ensures that conditions at the sites are consistent and continue to prevent fish passage but also	The recommendation to establish a fixed 5-year monitoring interval will provide little benefit to the current fish passage monitoring programs on the Tote Road. Once a stream is designated as fish-bearing or not by DFO through the permitting process of the Project, it is Baffinland's understanding that designation cannot be modified. Significant resources under three monitoring programs already exist for the Project fish-bearing Tote Road culverts. This ensures that monitoring effort is directed to documented crossings under the Project permitting framework. Many natural barriers that prevent fish passage at water crossing locations are

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		implementing a fixed monitoring interval would provide a more reliable and efficient approach to confirm continued fish exclusion. **References** **Document Name**: Appendix C.3 Tote Road Fish Habitat Monitoring 2025 Annual Report **Section**: 2.2 Fish Habitat Assessment **Page**: 7	ensures that the sites are not overlooked and that extra resources are not being used for unnecessary monitoring.	stable geomorphic features that do not typically change unless affected by major hydrologic or geomorphic disturbances.
63	F&FH#3	Catch totals of juvenile Arctic char were described as "similar to previous years at many crossings per previous annual reports." In the absence of supporting statistical analysis, this statement is subjective and does not allow for determination of whether year-over-year differences are statistically significant or within the range of expected variability. From a scientific and monitoring perspective, qualitative statements of similarity are insufficient to support robust interpretation of results. Without quantitative analysis, it is not possible to distinguish between natural variability, potential trends, or project-related effects. This limits the transparency and defensibility of conclusions presented in the report. **References** Document Name: Appendix C.3 Tote Road Fish Habitat Monitoring 2025 Annual Report Section: 3.3 Fish Use Assessments Page: 15	Statistical analyses should be conducted to evaluate temporal differences in fish catch data, and results should be presented in a manner that clearly demonstrates whether observed similarities or differences are statistically significant. This approach should be incorporated as a standard component of all future annual reporting for the Tote Road Fish Habitat Monitoring Program. The consistent application of statistical analysis will improve rigor, transparency, and comparability of results across years, and better support conclusions regarding potential Project related effects.	Baffinland agrees that quantitative information should be used, where appropriate, to support interpretation of monitoring results. However, Baffinland does not agree that simple statistical comparisons of annual Arctic Char catch totals or Catch Per Unit Effort (CPUE) would necessarily provide a more scientifically robust assessment of temporal change or Project-related effects. For that matter, it is industry standard, for expert aquatic monitoring biologists, not to utilise CPUE or catch totals as metrics of temporal change or Project-related effects due to the significant number of skewing variables associated with natural, seasonal variability paired with monitoring methodology variance. The Tote Road Fish Habitat Monitoring Program is designed to assess fish use, fish passage and the condition and performance of fish-bearing crossings. The program is not designed to estimate annual population abundance. Catch Totals and CPUE data collected during these assessments are influenced not only by the abundance of fish present, but also by sampling conditions and capture probability. Stream discharge, water depth, temperature, conductivity, habitat characteristics, fish size and other factors are known to influence electrofishing capture probability. These considerations are particularly relevant in Arctic streams, where the timing and magnitude of freshet, ice breakup, snowmelt and subsequent recession can vary substantially among years. Consequently, sampling conducted on comparable calendar dates does not necessarily represent comparable biological or hydrological conditions among years. Juvenile Arctic Char distribution and availability within individual Tote Road streams vary significantly with these conditions, independent of any change associated with Project activities. Baffinland therefore does not propose to incorporate a prescribed year-over-year significance test of raw catch totals as a standard component of future annual reporting. Baffinland will continue to present fish passage conclusions paired with site-specific observations and monitoring data, environmental conditions, historical results and professional interpretation by qualified fisheries biologists.
64	F&FH#4	Section 3.2 states that water quality monitoring data are presented in Table 2. Table 2 presents nearly 100 pages of raw data. The data are difficult to review because of the amount and the presentation. Also, no statistical analysis has been completed therefore no differences can be	Water quality data should be presented in graph format, supported by appropriate statistical analysis, to evaluate differences over	Baffinland agrees that future Tote Road Fish Habitat Monitoring reports would benefit from graphical summaries. Future reporting will therefore provide paired upstream/downstream graphical comparisons for selected water-quality indicators. The complete analytical dataset will

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		identified. Graphing the data and using statistical analysis to identify differences between sites, over years would be useful. Also, numerous cells in the table are missing values with no explanation given. Reasons for missing data should be given. **References** **Document Name**: Appendix C.3 Tote Road Fish Habitat Monitoring 2025 Annual Report **Section**: Section 3.2 Water Quality Monitoring of Baseline Fisheries Culverts and Tables and Figures **Pages**: 14 and 31-114	time and across locations. This approach should be implemented as a standard component of all future annual reports to improve data interpretation and transparency. In addition, future reporting should consistently include clear explanations for any missing data (e.g., sampling errors, access limitations, or environmental conditions), to ensure completeness of the dataset and to support accurate assessment of monitoring results.	continue to be provided electronically, and future reports will include a note for reasons samples or parameters that were not collected or analysed.
65	F&FH#5	Mary Lake triggered a Moderate Risk Responses for fish LFDs and condition; however, the conclusion that these differences reflect natural productivity is not supported by a clear assessment. In addition, the Moderate Risk Response for total aluminum in the south basin is not evaluated in relation to fish health endpoints. **References** **Document Name**: Appendix E.9.2 Mary River Project 2025 Core Receiving Environmental Monitoring Program Report **Section**: 5.4.5 Fish Population and 5.4.6 Effects Assessment and Recommendations **Page**: 290-297 and 298-299 of 977	It is recommended that productivity, habitat, and food availability be evaluated to determine whether these factors are sufficient to explain fish size and condition differences relative to reference conditions. Potential relationships between elevated aluminum in the south basin and fish health metrics should also be assessed using a weight-of-evidence approach.	The "Next Steps for 2026 CREMP Monitoring and Reporting" presented in Table 6.1 of the 2025 CREMP report included consideration of incorporating Before-After-Control-Impact (BACI)-type analysis of fish health endpoints to evaluate changes between mine-exposed and reference areas over time. This approach is more robust in that it provides an indication of whether a given endpoint has always differed between mine-exposed and reference areas (e.g., have near-shore fish from mine-exposed lakes always been larger relative to reference fish, even during baseline?) and whether that difference between areas has been growing larger or smaller over time (e.g., are the near-shore fish from the mine-exposed lakes getting larger over time, while reference fish are staying roughly the same size?). This approach, along with a more fulsome integration of water quality (e.g., aqueous total aluminum concentrations), sediment quality, and productivity (e.g., invertebrate densities) data into the interpretation of the fish results for 2026, will help clarify longer-term patterns in the data, as well as potential mine-related effects and causal pathways (e.g., exposure to elevated [relative to AEMP benchmarks] concentrations of certain parameters in water and/or sediment). The Revision 3 AEMP study design that is being implemented for the first time in 2026 includes updated TARP thresholds (i.e., relative to Revisions 1 and 2) that include consideration of results from consecutive studies (i.e., to identify and support management of longer-term patterns that may exist).
66	F&FH#6	Across the CREMP, benthic invertebrate communities and fish population endpoints (as well as water quality, sediment quality and chlorophyll a) are assessed largely as independent lines of evidence, with limited integration in the interpretation of results and Effects Assessment. While both components are evaluated in detail, the report does not consistently link changes in benthic invertebrate density, composition, or functional groups to observed patterns in fish condition, size structure, or productivity. Given that benthic invertebrates represent a primary food source for Arctic charr and play a fundamental role in aquatic food webs, changes in their abundance or composition are directly	It is recommended that the CREMP Effects Assessment adopt a more integrated, weight-of-evidence approach that explicitly links benthic invertebrate community metrics with fish population endpoints (as well as water quality, sediment quality and chlorophyll a). In particular, changes in benthic invertebrate density, composition, and functional groups should be evaluated alongside fish condition,	The CREMP report considers Fish endpoint conclusions holistically and examines benthic invertebrate results as factors for weight of evidence conclusions associated with benthic invertebrates. There are many instances that benthic invertebrate communities are discussed in the context of Fish communities. This approach, along with full integration of water and sediment quality, phytoplankton, and BIC data (e.g., densities, community composition) into the interpretation of the fish clarifies patterns in the fish population data.

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		relevant to understanding fish health responses. For example, observations of lower benthic invertebrate densities or shifts in community structure may influence fish growth, condition, or size distributions through changes in food availability or trophic dynamics. However, these potential linkages are not evaluated within a weight-of-evidence framework. As a result, the current assessment may overlook important ecological connections and mechanistic pathways that are necessary to interpret whether observed fish responses (e.g., changes in condition, size structure, or CPUE) are related to alterations in lower trophic levels, rather than being attributed primarily to natural variability or habitat differences. Text from Section 3.3.6.1 is provided below as an example, however this is consistent throughout the CREMP. "*However, higher taxonomic richness at Camp Lake relative to reference in 2025 triggered a Low Risk Responses under the TARP (Baffinland 2024). Additionally, a Moderate Risk Response was triggered by lower invertebrate densities in Camp Lake over the period of 2023 to 2025, relative to baseline. The assessment of arctic charr health at Camp Lake focused on endpoints related to survival (all fish), energy use (non-YOY life stages), and energy storage (i.e., condition; non-YOY life stages). The consistent and persistent long-term patterns observed when comparing fish health endpoints for Camp Lake and Reference Lake 3 were suggestive of natural variability between to the two lakes, rather than adverse mine-related effects in Camp Lake. However, maximum differences in LFDs for non-YOY and combined YOY/non-YOY fish were outside CES (reference and baseline) in 2024 and 2025, and condition of non-YOY fish was lower in 2025 relative to baseline (but within the CES of ±10%).*" **References** **Document Name**: Appendix E.9.2 Mary River Project 2025 Core Receiving Environmental Monitoring Program Report **Section**: 3.3.6.1 Effects Assessment **Page**: 140-145 of 977	size structure, and productivity to assess potential trophic and mechanistic connections. Given the importance of benthic invertebrates as a primary food source for Arctic charr, the assessment should examine whether observed variability in fish health metrics (e.g., condition, length–frequency distributions, and CPUE) may be influenced by changes in food availability or shifts in lower trophic levels, rather than being attributed primarily to natural variability or habitat differences.	
67	F&FH#7	Comparisons of fish size and condition at Sheardown Lake NW relative to both reference conditions and baseline present conflicting signals that are not fully resolved in the current assessment. Specifically, fish are consistently larger and heavier than those in the reference lake, suggesting a potentially positive effect; however, relative to baseline conditions, fish are smaller, lighter, and in poorer condition, indicating a negative response. On page 216 of 977, the report states, "*Longer-term comparisons between Sheardown Lake NW and Reference Lake 3 show that LFD and body size (fork length and body weight) for non-YOY arctic charr have been almost consistently significantly different throughout mine operations (2015*	It is recommended that comparisons to reference and baseline conditions be more explicitly integrated within a weight-of-evidence framework to reconcile conflicting signals in fish size and condition. In particular, the assessment should prioritize evaluation of temporal changes relative to baseline to determine whether declines in fish condition	Please see the response to Intervenor Comment No. F&FH#5.

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		to 2025; Table 4.7). ***<u>These differences have generally reflected larger and heavier fish in Sheardown Lake NW relative to reference</u>***.*"* The following paragraph states, "*Relative to the baseline period, LFD for nearshore fish from Sheardown Lake NW have shown consistent significant differences across all operational years, and fish condition was significantly lower throughout the mine operational period relative to baseline, except in 2023 (Table 4.7).*" While the report acknowledges both patterns, the interpretation emphasizes differences from the reference lake without adequately addressing the decline in condition and size relative to baseline, which represents the most direct pre-development benchmark. This creates uncertainty in the overall conclusion, as the observed patterns may reflect declining fish performance over time despite differences between lakes, rather than simply natural variability. The lack of integration between these two comparison frameworks limits the ability to determine whether observed changes are indicative of mine-related adverse effects, natural differences between systems, or a combination of both. As a result, the ecological significance of the observed trends in fish size, weight, and condition remains unclear. **References** **Document Name**: Appendix E.9.2 Mary River Project 2025 Core Receiving Environmental Monitoring Program Report **Section**: 4.4.5.2.1 Nearshore Arctic Charr (DL0-01) **Page**: 215-218 of 977	and body size have occurred over the mine-operational period. The analysis should examine whether the apparent positive differences relative to the reference lake may reflect inherent differences between systems (e.g., productivity or habitat), rather than improved fish performance, and should assess whether the consistent reductions in condition and size relative to baseline indicate a potential mine-related adverse effect.	
68	F&FH#8	The 2025 results for Sheardown Lake SE indicate a notably high proportion of YOY Arctic charr (44%), along with significantly larger YOY fish relative to the reference lake. This indicates strong recruitment, with the high number and relatively large size of YOY fish influencing the overall size structure and LFDs. While the report notes that inclusion of YOY did not change statistical significance, the substantial shift in magnitude of difference (MOD) indicates that recruitment dynamics are a key driver of observed patterns. However, the implications of increased YOY abundance and growth are not fully considered, especially for comparisons to reference conditions and long-term trends. In addition, the discussion of fish health is limited. While YOY and non-YOY condition factors were comparable to reference in 2025, longer-term results indicate variability in size, condition, and LFDs among years. These interannual differences should be more explicitly evaluated to determine whether they reflect natural variability or potential environmental influences affecting growth or energy allocation.	The proponent should consider how YOY recruitment may be affecting fish population results and interpretation of mine related effects. In particular, examining how the high proportion and larger size of YOY contribute to observed size structure patterns could help distinguish recruitment driven variability from changes affecting older fish (e.g., growth or condition). Accounting for these dynamics within the weight-of-evidence framework may improve the ability to determine whether observed patterns reflect natural variability or are potentially associated with mine-related influences.	As part of the 2026 reporting cycle for the CREMP, the study team will consider how the proportion and size of young-of-the-year (YOY) arctic charr in CREMP waterbodies contribute to the observed size structure patterns. To the extent possible based on the available data, this information will be used to determine whether observed patterns are reflective of natural variability or potential mine-influence.

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		Finally, the concluding linkage to benthic invertebrates is not well supported in the preceding discussion. If benthic invertebrate availability is being invoked as a mechanism influencing fish growth or recruitment, relevant observations (e.g., trends in density, biomass, or community composition) should be clearly presented and integrated. **References** **Document Name**: Appendix E.9.2 Mary River Project 2025 Core Receiving Environmental Monitoring Program Report **Section**: 4.4.5.2.1 Nearshore Arctic Charr (DL0-01) **Page**: 243-245 of 977		
69	F&FH#9	The monitoring report identifies multiple Low Risk Responses in Sheardown Lake SE for water quality parameters that were elevated relative to both reference and baseline normal ranges, including major ions, metals, nutrients, and dissolved aluminum. Increasing trends over the mine operations period were also noted for nitrate, sulphate, molybdenum, and uranium, although concentrations remained below applicable benchmarks in 2025. While the report attributes observed fish health differences primarily to natural variability (e.g., size structure and recruitment), the specific patterns warrant clearer integration with these water quality trends. In 2025, fish health results were characterized by i. a high proportion of YOY Arctic charr that were larger than those in the reference lake, ii. generally larger, heavier, and higher-condition fish relative to reference in gill net samples, and iii. lower condition relative to baseline and a broader size distribution reflecting more small- and mid-sized fish. Longerterm results also show variable differences in size, weight, and condition relative to both reference and baseline, without a consistent directional trend. Despite these observations, the assessment does not clearly evaluate how this variability, particularly shifts in size structure and condition relative to baseline, relates to increases in multiple water quality parameters. In addition, although benthic invertebrates are identified as a potential driver of fish productivity, supporting evidence is limited. The report notes higher benthic invertebrate density in 2025 relative to reference, but also indicates no consistent temporal trends in benthic invertebrate endpoints that would explain interannual variability in fish metrics. This weakens the linkage between lower trophic levels and observed fish population patterns. Overall, the basis for excluding potential mine-related influence is not fully understood. Where multiple water quality parameters show increasing trends over the operational period, a more integrated weight-of-evidence discussion explicitly linking water quality, benthic invertebrate	The proponent should integrate water quality trends and associated Low Risk Responses into the weight-of-evidence assessment for Sheardown Lake SE. In particular, the assessment should consider whether increasing trends in parameters such as nitrate, sulphate, molybdenum, uranium, and other elevated constituents have any plausible relationship to observed patterns in benthic invertebrate communities or fish health endpoints. Even where concentrations remain below applicable benchmarks, evaluating these temporal trends alongside biological responses would strengthen the rationale for determining whether observed differences reflect natural variability, habitat conditions, or potential mine-related influences.	The 2026 CREMP report will include a detailed interpretation of BIC and fish health endpoints for Sheardown Lake SE. The study team will employ a WOE approach that integrates consideration of water quality trends and Low Risk Responses triggered for water and sediment quality to identify potential mine-related influences.

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		results, and fish health endpoints would strengthen the interpretation and improve confidence in the conclusion. **References** **Document Name**: Appendix E.9.2 Mary River Project 2025 Core Receiving Environmental Monitoring Program Report **Section**: 4.5.6.1 Effects Assessment (DL0-02) **Page**: 247-249 of 977		
70	F&FH#10	Visual interpretation of the length frequency figures in CREMP Appendix F would benefit from the inclusion of information on the range of sampling dates (yyyymmdd). This applies to comparisons of data from lakes sampled in the same year (e.g., Figure. F.1, F.12, F13), and to comparisons of lakes sampled in the current year with their earlier baseline data (e.g., Figures F.4 and F.5). It would be particularly useful when comparing electrofishing data from YOY and other fast-growing early age classes where a modest difference in seasonal timing can skew the comparisons. **References** **Document Name**: Baffinland Iron Mines 2025 Annual Report to QIA and NWB on Operations, Appendix E.9.2 Core Receiving Environment Monitoring Program Report (CREMP) [260331 - 2025 QIA-NWB Annual Report for Ops - Appendix E.9.2 – 2025 CREMP Report.pdf] **Section**: Appendix F. Fish, Figures F.1 to F.19 **Pages**: pdf 863 to 883 of 977	QIA recommends that captions for figures comparing fish length frequencies among or between years include the range of fish sampling dates for each lake, and for any baseline data presented, to facilitate seasonal and interannual comparisons.	For the 2026 CREMP report, the study team will plan to include the fish sampling dates for each lake on the Length Frequency Distribution figures or, if doing so affects the readability of the figures, the dates for each lake and monitoring year will be provided in a table format. Please note, however, that annual variation in air and water temperatures, ice breakup, and emergence also influence data and results for fish growth, in addition to the timing of data collection.
71	F&FH#11	Sedimentation rates at SHAL-2 (which is identified as a potential Arctic charr spawning and egg incubation habitat) were significantly higher than SHAL-1 and comparable to the profundal depositional zone during the 2025 open water period. This indicates that a sensitive littoral spawning habitat is experiencing sedimentation conditions similar to the deep profundal area of the lake. The report attributes this to a backflow of turbid water during heavy rainfall events, with visible plumes concentrated near SHAL-2. Elevated sedimentation, combined with finer and more organic material, can fill interstitial spaces, impact oxygen supply to eggs, and smother spawning habitat, especially when deposition occurs repeatedly. Section 3.1.2 further states that average sedimentation rates at all littoral areas including SHAL-2 were significantly higher in 2025 relative to 2014. Although sediment accumulation thickness remains below established thresholds, the evidence presented indicates increasing sedimentation during the open water period and exposure of the most sensitive receptor in the study area. These factors are not fully captured by threshold based assessments and represent a potential emerging risk to arctic charr spawning habitat.	Provide a habitat specific, trend based assessment of sedimentation risk at SHAL-2 that includes: • A detailed assessment of the ecological implications of elevated sedimentation rates at SHAL-2, specifically for Arctic charr spawning and egg incubation. • Consideration of cumulative and repeated deposition events, rather than single-threshold exceedances. • Proposed site-specific mitigation measures to reduce sediment transport and deposition at SHAL-2. • Development of adaptive management triggers that go beyond sediment thickness	The 2026 reporting cycle for the CREMP and LSMP will include an assessment of sedimentation-related risks to arctic charr spawning and egg incubation, based on data collected from SHAL-2 in Sheardown Lake NW, as well as information from the relevant scientific literature. However, it should be noted the LSMP already comprehensively does this when paired with the CREMP. Changes in sedimentation rates over time and cumulative effects will be considered however the threshold set for potential impacts well protective of potential fish habitat. It should be noted that event-based is already occurring under Baffinland's SWAEMP. Site-specific measures that may be implemented or proposed to reduce sediment transport and deposition at SHAL-2 will also be described.

No.	Intervener Comment No.	Intervener Comment	Intervener Recommendation	Baffinland's Response
		References **Document Name**: Appendix E.9.3 Lake Sedimentation Monitoring Program Report **Section**: 3.1.1 Spatial Comparisons for the 2024 to 2025 Ice Cover and Open Water Periods and 3.1.2 Temporal Comparisons for the 2024 to 2025 Ice Cover and Open Water Periods **Page**: 29 of 231, 34-36 of 321	thresholds and incorporate rate, frequency, and habitat sensitivity. • Recommendations for more robust monitoring approaches (e.g. targeted event-based sampling, or in-situ turbidity monitoring).	
72	F&FH#12	In its response to QIA comments on the 2024 QIA-NWB Annual Report on Operations (ARO), Baffinland objected to QIA reiterating concerns about the validity of the annual sediment accumulation thresholds (Attachment 1, Table A1, p, 23). These thresholds are used in the AEMP to trigger mitigation and management responses related toArctic char egg survival. In the 2025 QIA-NWB ARO, Baffinland refers to these thresholds frequently, including the following example: "Annual sediment accumulation thickness estimates for Sheardown Lake NW, based on the combined ice cover and open water conditions during 2024/2025, were within the range reported for Arctic lakes of comparable size and/or depth and were below the FEIS prediction of 1 mm/year associated with negligible effects on direct mortality of arctic charr and arctic charr eggs." (2025 QIA-NWB ARO, p. 37) This wording may imply that a sediment accumulation rate of 1 mm/year has been shown to have negligible effects on Arctic char egg survival. However, this High Action response threshold is not based on data from Arctic char eggs or project-generated sediment. Rather, it reflects professional judgment extrapolated from studies on other species and different sediment types (Morgan et al. 1983; Fudge and Bodaly 1984; Berry et al. 2011). The Low (0.15 mm/year), Moderate (0.54 mm/year), and High (1 mm/year) response thresholds have not been validated for Arctic char. Placing undue reliance on these thresholds risks either underestimating or overestimating the effects of changes in sediment deposition. Given this uncertainty, effects on Arctic char and their eggs should not be characterized as "associated with negligible effects on direct mortality of Arctic char and Arctic char eggs" unless the basis for that characterization is clearly qualified. Otherwise, readers, including regulators, may give the thresholds more weight than is warranted. This is important given the increasing trend in sediment deposition at Sheardown Lake NW and Baffinland's plans to increase ore production associated with the Steensby Component, which may increase dust and sediment mobilization sufficiently to test these thresholds. In its response to the 2024 response to QIA comments, Baffinland stated that it will provide an updated review of sedimentation effects on fish egg survival in the 2025/2026 report. It expects the proposed changes in activities and infrastructure to decrease dust and sediment mobilization,	QIA recommends Baffinland take a precautionary approach to sediment deposition, ensure readers are aware that the sediment thresholds for Arctic char have not been validated, and complete studies to validate sediment thresholds for Arctic char egg survival prior to any planned production increase.	The Low-Risk Response (previously Low Action Response) TARP threshold value (0.15 mm) is based on the upper range of the natural sedimentation rate of 50 mg/cm2/yr converted to a sediment accumulation thickness estimate using the bulk density of deposited sediment at Sheardown Lake NW. In other words, sediment accumulation thicknesses of up to 0.15 mm during the ice-cover/egg incubation period are considered comparable to natural patterns of sediment deposition, and no adverse effects on Arctic charr spawning and incubation beyond those associated with natural sedimentation are expected. The value also sources from peer-reviewed literature that incorporated the site-specific data. The Low-Risk Response Threshold value was not exceeded during the ice-cover periods associated with the 2023/2024 or 2024/2025 LSMP. These results indicate that mine-related changes to the quantity or quality of spawning, incubation, or larval rearing habitat are not likely occurring. In the event that the Low-Risk Response Threshold is exceeded based on the 2025/2026 LSMP data for the ice-cover/egg incubation period, the study team will consider the need for studies to validate the Moderate and High-Risk Response Thresholds. **Baffinland considers this item (F&FH#12) closed**.

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		and has no plans to conduct targeted studies to assess the validity of these thresholds for Arctic char. References: Berry, W.J., N.I Rubinstein, E.K. Hinchey, G. Klein-MacPhee, and D.G. Clarke. 2011. Assessment of dredging-induced sedimentation effects on winter flounder (Pseudopleuronectes americanus) hatching success: results of laboratory investigations. Proceedings of the Western Dredging Association Technical Conference and Texas A&M Dredging Seminar, Nashville, Tennessee, June 5-8, 2011. pp. 47 – 57. Fudge, R.J.P., and R.A. Bodaly. 1984. Post-impoundment winter sedimentation and survival of lake whitefish (Coregonus clupeaformis) eggs in Southern Indian Lake, Manitoba. Canadian Journal of Fisheries and Aquatic Sciences 41: 118 – 125. Morgan, R.P, V.J. Rasin and L.A. Noe. 1983. Sediment effects on eggs and larvae of striped bass and white perch. Transactions of the American Fisheries Society 112: 220 – 224. **References** **Document Name**: Baffinland Iron Mines 2025 Annual Report to QIA and NWB for Operations, Appendix E.9.3 Lake Sedimentation Monitoring Program Report [NWB Registry: 260331 - 2025 QIA-NWB Annual Report for Ops - Appendix E.9.3 – Lake Sedimentation Monitoring.pdf]. **Section**: 4 Conclusions **Page**: 37 (pdf p. 46 of 231) **Document Name**: Baffinland Iron Mines 2024 Annual Report to QIA and NWB on Operations Intervenor Comments. [NWB registry file: 251002 2AM-MRY2540 2024 Annual Report for Operations - Intervenor Comments BIMC Response Letter Final-ILAE.pdf] **Section**: Attachment 1, Table A.1: Status of QIA Comments on Baffinland's 2024 QIANWB Annual Report for Operations, Response 46, QIA FFH#12 **Page**: 23 of 77		
73	F&FH#13	The report identifies statistically significant relationships between benthic community composition and sedimentation, including a strong negative correlation between Chironomidae and sedimentation (rate and accumulation), and a positive correlation with Ostracoda. Despite these findings, the report concludes that there are no meaningful ecological effects based primarily on the absence of relationships with density, richness, or evenness metrics. Shifts in benthic community composition are early indicators of habitat stress and may precede detectable changes in aggregate diversity indices. The observed trend (decreasing Chironomidae and increasing Ostracoda with increasing sedimentation), combined with elevated sedimentation at SHAL-2 and increasing trends over time, suggests a potential early biological response to sedimentation rates and accumulation. Focusing	To ensure impacts are adequately understood, the proponent should: • Re-evaluate the ecological interpretation of benthic results to explicitly consider taxa-specific responses (particularly Chironomidae and Ostracoda) as potential indicators of sedimentation-related habitat change, rather than relying primarily on community-level indices.	The 2026 LSMP report will provide an updated interpretation (that considers data collected in 2026) of the BIC results, including taxa-specific changes that may be indicators of sedimentation-related habitat change. The study team will consider the utility of community-composition-based effects thresholds for BIC.

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		solely on broad community metrics (e.g., richness, evenness) may hide important changes in habitat quality and food availability for Arctic charr. Overall, the system may currently meet compliance thresholds; however, multiple lines of evidence, including sedimentation trends, exposure of sensitive littoral habitat, and taxa-specific benthic responses, indicate a developing pressure that could become biologically significant if it persists. **References** **Document Name**: Appendix E.9.3 Lake Sedimentation Monitoring Program Report **Section**: 3.4 Benthic Invertebrate Community Relationships with Sedimentation Rate and Thickness and the Potential Effects to Arctic Charr **Page**: 43-45 of 231	• Identify thresholds, triggers, or early warning indicators based on benthic composition (e.g., declines in Chironomidae dominance), to support proactive management before effects are reflected in broad diversity metrics.	

Table 2: BIM Responses & Status of DFO Comments on Baffinland's 2025 QIA-NWB Annual Report for Operations

Cmt. #	Reviewer's Detailed Comment	Reference Section	Baffinland's Response
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.	NA	Baffinland thanks the reviewer for the summary of DFO's Projects Near Water portal and confirms that Projects Near Water guidance is a step in Baffinland's process for considering projects near waterbodies.
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.	Section 7.5 Natural Erosion and Sedimentation	Baffinland agrees with DFO's comment that the degree of suspended sediment cannot be classified through aerial surveys. Section 7.5 reports on completing aerial surveys beyond (but in close proximity to) the Project Lease Boundary, and undeveloped areas within the lease where conditions are observed to identify locations where erosion and sedimentation are visible, followed by water quality monitoring if safe landing for the helicopter and access for personnel is available. Table 7.10 in the annual report presents the 2025 results of water quality monitoring for samples collected during the aerial surveys. Further details about the observations and water quality samples collected are provided in the discussions in subsections 7.5.1, 7.5.2, and 7.5.3. In total, ten (10) samples were collected for the purpose of determining suspended sediment concentrations at locations where natural sedimentation was observed in 2025. In 2025, at the request of ECCC, Baffinland conducted a data analysis which evaluated the Roads Management Plan TRMP criteria, incorporating natural variability data available for the Tote Road into the analysis. The analysis confirmed that the TSS trigger of 50 mg/L change may not have been solely reflective of natural variability adjacent to the Tote Road. Therefore, Baffinland agreed that the CCME trigger of 25 mg/L (and 10% when background levels exceed 250 mg/L) is appropriate for identifying potential Project-related change, and the CCME guidelines are being applied for the 2026 field season as per the submitted and approved SWAEMP. The guidelines within the Roads Management Plan will be amended in the next update of the plan to reflect the CCME TSS criteria for identifying potential Project-related change. Baffinland clarifies that monitoring runoff from the Tote Road is conducted under the Project's Tote Road Monitoring Program (TRMP) at twenty (20) locations along the Tote Road. The 2025 Tote Road Monitoring Program is discussed in Section 7.3.8 of the 2025 QIA-NWB Annual Report for Operations.

Table 3: BIM Responses & Status of CIRNAC Comments on Baffinland's 2025 QIA-NWB Annual Report for Operations

	Subject	Reviewer's Detailed Comment	CIRNAC Recommendations	Baffinland's Response
R-01	Review of Previous CIRNAC Annual Report Recommendations (2023 to 2024)	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.	(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.	Baffinland has completed a detailed reconciliation of every historical item retained in CIRNAC's Table A. This reconciliation is provided as **Attachment 3 — Detailed Reconciliation of Historical CIRNAC Annual Report Recommendations Identified in 2025 CIRNAC R-01**. Attachment 3 identifies CIRNAC's current characterization of each item, the previous Baffinland response and supporting regulatory record, the current status of any associated work, and Baffinland's requested disposition. Attachment 3 demonstrates that all thirteen historical recommendations have received substantive responses. Some associated technical or construction activities remain underway, including reclamation work, climate-related thermal modelling, KM105 engineering, and development of a northern-appropriate landfarm operating program. The continuation of those activities does not mean that Baffinland has failed to respond. A clear distinction must be maintained between response complete, implementation ongoing, implementation complete, technical disagreement, superseded, and closed. In response to CIRNAC's review of the 2024 Annual Report, Baffinland submitted a dedicated 17-page response to CIRNAC R-01 by the assigned October 15, 2025 deadline. CIRNAC's October 24 reply subsequently stated that Baffinland had merely committed to providing a response and that R-01 remained outstanding, without acknowledging the detailed submission. Within CIRNAC's current Table A. Several recommendations are identified as having received "no response" because a response was not repeated in Appendix E.13.1, despite direct responses having been provided in Baffinland's October 2, 2025 submission. Based on the detailed reconciliation provided in Attachment 3, and historical submissions, Baffinland considers that the historical recommendations identified under 2025 CIRNAC R-01 have been responded to and closed. Where implementation remains underway, or a residual issue has been carried forward into a current recommendation, that matter should be tracked solely through the applicable current or established reporting process. Should CIRNAC wish to discuss select items further, Baffinland requests that CIRNAC discuss the matters on the Project site during compliance inspections of Water Licence No: 2AM-MRY2540 **Baffinland considers this item (CIRNAC) R-01 closed.**
R-02	Water Reporting (Schedule B, Items 1 to 4)	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	CIRNAC recommends the following for Baffinland:	Baffinland notes that three, not five, tables present water withdrawal data associated with Section 4 of the Annual Report: Table 4.1, Table 4.2, and Table 4.3 (which presents the combined monthly and annual volumes of all fresh water withdrawn for domestic,

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		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.	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.	industrial, and dust suppression purposes). Table 4.1, Table 4.2, and Table 4.3 all follow the established CPL-OG-08 Annual Report Workbook tables provided by the QIA in the Lease Operations Guide, which Baffinland will continue to follow. As per the QIA CPL-OG-08 Annual Report document: Baffinland Iron Mines Qikiqtani Inuit Association Commercial Lease No.: Q13C301 Annual Report Submission: "BIMC is required to follow this procedure when submitting to QIA its Annual Report detailing Operations and Work for the previous Year on Qikiqtani Inuit Owned Lands (IOLs)." Furthermore, the document states: **"**This Annual Report is also prepared for submission to the Nunavut Water Board (NWB) in accordance with Schedule B of the Type A Water Licence 2AM-MRY1325, and as a result the report seeks to satisfy the conditions of both the Commercial Lease and the Type A Water Licence. Some of the information is requested to be provided using the templates in the accompanying Excel workbook, as indicated in each section." "5.0 Uses of Water Summary This section of the Annual Report will include the uses of water pursuant to an existing Water Compensation Agreement by BIMC and QIA pursuant to the Lease. Please use the Table 5.1, 5.2 and 5.3 templates outlined in the Excel workbook to provide this information." Note that in the Annual Report, the water use section is currently identified as Section 4 and the Lease Operations Guide Excel workbook templates for Table 5.1, 5.2 and 5.3 are accordingly identified as Table 4.1, 4.2 and 4.3, respectively. As a final note, format and data presentation are not a basis for determination of compliance. Schedule B of the Water Licence sets out criteria for information required, not format. **Baffinland considers this item (CIRNAC R-02) closed.**
R-03	Waste Reporting (Schedule B, Items 5 to 8)	Based on the review of Schedule 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	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	a. During 2025, stormwater retained within containment areas associated with the Project's bulk fuel storage facilities (MP-03, MS-03, MS-03B), hazardous materials storage berms (HWBs), and landfarm facilities (MP-04/MP-04A, MS-05) was analyzed in accordance with the Type 'A' Water Licence (Part F, Item 9; NWB, 2025), treated if required using the mobile OWTS, and discharged to the receiving environment as required. In 2025, solely Hazardous waste berms were required to be treated through the mobile OWTS. Volumes of stormwater discharged from containment areas are provided in Table 5.3. b. Table 5.2 shows the monthly and annual quantities of sewage sludge disposed of by location. As noted in footnote a, sludge generated by STPs is pressed into cake and disposed in the site incinerators or backhauled for off-site disposal. Weights of

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		described, the report lacks a clear linkage between reported sludge quantities and specific disposal methods and/or locations in a consolidated format.	disposal methods and locations (e.g., incineration vs. off-site disposal/backhaul).	dewatered sludge cakes backhauled off-site are provided in Appendix E.1 Waste Backhaul – Annex Manifests, and Appendix E.4.2 Consolidated Southbound Manifest 2025. The Annex Manifests provide sewage sludge shipped off-site by weight, which cannot be reconciled to volume as requested due to factors including shipping container weights, mixed loads, and sludge moisture content.
R-04	Hazardous Waste Generation Tracking (Schedule B, Item 9)	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.	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.	Baffinland apologizes for the confusion and confirms that the table showing the volume of hazardous waste materials shipped off the property was inadvertently identified as Table 4.2 in Section 5.2.5 of the Annual Report. The correct table showing the volume of hazardous waste materials shipped off the property is Table 2.4. a. Table 2.4 Equipment and Materials Shipped off the Property – 2025 provides the volumes of hazardous waste, dangerous goods, and non-hazardous materials shipped off the property in 2025. b. During 2025, there were three (3) sealift backhaul events for Project waste. The backhaul sealift vessels departed Milne Port in August, September and October 2025 carrying non-hazardous and hazardous waste materials generated and stored on site by the Project since the previous sealift backhaul in 2024. In future annual reports, Baffinland will show both the monthly and total annual volume of hazardous waste shipped offsite in Table 2.4. c. The shipment of hazardous waste materials off the Project and transport to licensed receiving facilities in Southern Canada was coordinated through Qikiqtaaluk Environmental (QE). Received waste materials were processed at the Port of Valleyfield for transport to the appropriate waste receiving facilities in Southern Canada. The receiving facilities that QE utilized included Solva-Rec Environment Inc. and Récupération Mario Hart, both located in Quebec. d. Baffinland will ensure the table number referenced in the text in Section 5.2.5 of the 2026 Annual Report will be cross-referenced to the proper table and apologizes for the clerical error in 2025.
R-05	Landfill Waste Disposal Volumes (Schedule B, Item 11)	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 m^3); 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.	CIRNAC recommends Baffinland provide a table summarizing the monthly and annual volumes (m^3) 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,	a. One survey of the landfill is completed annually in July to avoid the erroneous volumes that resulted when additional surveys were completed during the winter and spring months due to snow accumulation skewing results. Baffinland will provide an average value per month of waste deposited in the landfill facility, based on the annual survey, in future annual reports. b. There is only one Landfill Facility at Mary River currently, located at the Mine Site. c. Baffinland confirms QIA and Baffinland have agreed to report annual values, not monthly quantities of waste deposition and quarry material removal to reduce inaccuracy resulting from surveys performed in shoulder and winter seasons with significant snow volumes skewing surveys. Annual surveys are performed in July in snow-free conditions. Baffinland presented a total annual volume consistent with Quarry and Waste Concession Reporting. Since CIRNAC would prefer the previous

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			d. Confirm whether the reported total annual volume of 3,570 m³ represents all landfill facilities combined or a subset of facilities.	table format, Baffinland will continue to show the monthly estimated volumes, based on the annual survey, in future annual reports. d. The total volume of 3,470 m³ is the total annual volume of waste placed at the Landfill Facility in 2025.
R-06	Hydrocarbon Impacted Soil and Water Landfarm Volumes (Schedule B, Item 12)	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.	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.	a. One survey of the landfarm facilities is completed annually in July to avoid the erroneous volumes that previously resulted when additional surveys were completed during the winter and spring months. Baffinland will provide an average value per month of waste deposited in each landfarm facility, based on the annual survey, in future annual reports. b. As shown in Table 5.7.2 Monthly and Annual Quantities of Hydrocarbon Impacted Snow and Water Deposited - Landfarm Facilities, no water contaminated snow or water was deposited into the Milne Port Contaminated snow & water containment berm MP-04A. However, compliant water was discharged from MS-05 and MP-04 as per Table 5.3. c. Baffinland notes that this comment extends beyond the scope of annual reporting requirements under Schedule B, Item 12, of the Water Licence, which indicates the Annual Report shall include: "Monthly and annual volume in cubic metres of hydrocarbon impacted soil and water deposited at each Landfarm Facility." Baffinland welcomes CIRNAC inspectors to review internal material tracking documentation during facility inspections and outside of the Annual Report review. d. As shown in Table 5.7.1 Annual Quantities of Hydrocarbon Impacted Soil Deposited - Landfarm Facilities - July 1, 2024 to June 30, 2025 Reporting Period, all hydrocarbon impacted soil deposited in landfarm facilities in 2025 was deposited in the Mary River Landfarm. e. Baffinland will consider improvements to presentation of information in the Annual Report where practical but due to the size and complexity of the report and the data provided, Baffinland prefers to keep the annual report tables separate from the main body of the report. In addition, many tables and sections of the annual report are presented to meet the requirements of the QIA CPL-OG-08 Annual Report document: Baffinland Iron Mines Qikiqtani Inuit Association Commercial Lease No.: Q13C301 Annual Report Submission, as described in more detail in Baffinland's response above to CIRNAC R-02.
R-07	Landfill Seepage Quantities and Analysis (Schedule B, Item 15)	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	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.	• Schedule I of the Type 'A' Water Licence 2AM-MRY2540 (NWB, 2025) distinguishes surface water monitoring stations downstream of Project infrastructure as Verification Monitoring Program locations. As per Schedule I, monitoring parameters and locations under the Verification Monitoring Program are internal to Baffinland, and the program is to be carried out to provide water quality data for

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		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.).		operational and management purposes and to inform and support adaptive management measures, where necessary. As such, and consistent with other internal monitoring for operational purposes, internal verification monitoring results are not reported externally in the annual report. However, Baffinland will continue to provide updates on facility performance and any adaptive management in the annual report to ensure Baffinland's regulatory stakeholders are kept informed of any important updates. Should the NWB request the licence condition Schedule B, Item 15 for the landfill SNP sites supersede the Schedule I Verification Monitoring definition, Baffinland will include the data within the Annual report. • Please refer to MS-MRY-13A daily average discharge data provided in Table 2, Table 3 and Table 4 of the SNP Hydrometric Report for surface water flows that may interact with the landfill (Annual Report Appendix E.3). • Table 7.1 presents Baffinland's effluent and water quality monitoring stations under the Water Licence (Schedule I) and established monitoring stations under associated management plans that are sampled annually, including their locations and their status during the reporting year (i.e. active, inactive, not constructed). The occasional occurrence of seepage bypassing water management facilities is expected as runoff management facilities require ongoing maintenance. When facility-derived seepage occurs, short-term interception and recovery of the seepage is implemented. In response to potential facility-derived seepage, temporary ad-hoc sampling locations are established where required as part of the investigation response to support the investigation and characterize the seepage. For instance, sampling may be implemented to obtain a water-quality signature for determining if the seepage is consistent with facility contact water and distinguishable from surrounding natural drainage, or to confirm effectiveness of interception/recovery measures implemented. Potential facility-derived seepage that bypass collection systems or infrastructure is reported to the NT-NU Spill Report Line and to relevant regulators. Associated seepage monitoring is fully outlined in the follow-up spill reports, including photos of the seepage, descriptions and coordinates of sample locations, figures showing the location of the seepage and sample locations, immediate and corrective actions taken, and sampling water quality results. In 2025, seepage was reported bypassing the KM106 Ore Stockpile diversion berm and from the Waste Rock Facility (WRF) West perimeter ditch. A copy of the initial and follow-up spill reports is provided in Appendix E.8.3 of the annual report, and the seepage occurrences are also summarized in the relevant sections of the annual report (Section 7.3.5 for the KM106 Ore Stockpile, and Section 7.3.3 for the WRF).

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				Facility-derived runoff and seepage that are collected and managed through Project water-management infrastructure are measured and reported through the applicable facility discharge-monitoring records, including the required daily, monthly and annual discharge quantities and associated analytical results. Baffinland does not create a second, duplicative volume for the same water by separately reporting it as seepage after it has been collected and accounted for at the monitored discharge point. Confounding factors such as meteoric snow melt and rain accumulation impacts seepage estimates as Baffinland conservatively transfers back all water to containment Facilities within secondary seepage collection systems (for example the MS-08 secondary containment berm). Confirmed uncontrolled seepage that bypasses the managed water system is quantified or reasonably estimated where practicable, with the method and associated uncertainty documented.
R-08	Solid Waste Disposal (Schedule B, Item 16)	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.	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.	a. One survey of the landfill is completed annually in July to avoid the erroneous volumes that resulted when additional surveys were completed during the winter and spring months. Baffinland will provide an average value per month of waste deposited in the landfill facility, based on the annual survey, in future annual reports. b. Volumes of solid waste disposed of in each of the disposal locations are provided in the Annual Report tables, as follows: • Landfill facility – Table 5.6. • Landfarm facilities – Table 5.7.1 and Table 5.7.2 • Sewage sludge cake – Table 5.2 • Hazardous waste and materials (shipped offsite for disposal) – Appendix E.1 provides the movement documents for hazardous waste transported off site in 2025. The annual volume of hazardous waste materials shipped off the property in 2025 is included in Table 2.4. c. Volumes of materials deposited in the Landfill Facility include solid waste that is disposed of onsite from all Project components. No contaminated soil or sewage sludge cake was generated from Bruce Head Camp or satellite facilities in 2025. d. Baffinland notes that this comment extends beyond the scope of annual reporting requirements under Schedule B, Item 16, of the Water Licence, which indicates the Annual Report shall include: "A summary report of solid waste disposal activities including monthly and annual quantities in cubic metres of Waste generated and location of disposal." As required, volumes of solid waste disposed of are provided in the tables referenced in b. above and a full summary of solid waste management

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				is provided in Section 5.2 of the Annual Report. The associated comment e. is therefore not applicable.
R-09	Dustfall Review (Schedule B, Item 18)	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).	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.	Baffinland confirms that the Dustfall review was completed as part of the 2025 QIA-NWB Annual Report. The Memorandum is included in Attachment 5 of this submission. No management plans were identified for update as a result of the dustfall data review.
R-10	10. Unauthorized Discharges (Schedule B, Item 19)	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.	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.	Complex field conditions often make estimating sediment-laden water volumes in streams and from seepage of snowmelt and thawing ground during freshet conditions difficult to accurately estimate. A significant limiting factor is that Baffinland conservatively reports elevated total suspended solids in receiving environments at the Mine site where there is no defined compliance point or flow meter. Other limiting factors occur when a spill is identified post-event or if unauthorized discharges or seepage events occur from compliance facilities over uneven tundra surface with low laminar flows. Baffinland will continue to provide spill estimates where feasible and will provide a description of any constraints preventing the estimation of volume in future follow-up spill reports and in Table 6.2 List of Reported Spills and Unauthorized Discharges in future annual report submissions.
R-11	Spill Contingency Plan Update Summary (Schedule B, Item 21)	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.	CIRNAC recommends Baffinland explicitly address Item 21 by either: Providing a concise summary of any updates or revisions made to the SCP during the 2025 reporting period; or 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.	As shown in Annual Report Table 9.1 Management and Monitoring Plan Updates - 2025, no updates to the SCP occurred in 2025. Baffinland confirms that the 2025 annual training exercises resulted in no SCP updates. As shown in Table 9.1, the SCP will be reviewed again and revised, if applicable, in 2026. Baffinland notes that the third recommendation extends beyond the scope of annual reporting requirements under Schedule B, Item 21, of the Water Licence, which indicates the Annual Report shall include: A summary of any updates or revisions to the Spill Contingency Plan. A summary of any updates or revisions to the SCP as a result of the annual review in 2026 will be included in the 2026 Annual Report, as per Schedule B, Item 21.

	Subject	Reviewer's Detailed Comment	CIRNAC Recommendations	Baffinland's Response
R-12	AEMP Deficiencies (Schedule B, Item 23)	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.	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.	The Study Design for the next (fourth) EEM biological study was submitted February 10, 2026, and the biological study field collections were implemented in August 2026. The corresponding EEM Interpretative Report for the fourth biological study will be submitted to ECCC in January 2027 and included with the 2026 NWB-QIA Annual Report for Operations. Dustfall Monitoring Program is reported in the TEAMR, with applicable results used to holistically interpret potential mine-related changes on aquatic ecosystems on the Project and included in the CREMP. For example, metal analyses that include potential contaminants of concern monitored through the dustfall monitoring program are provided to Minnow Environmental to review and incorporated into report conclusions. As indicated in Section 2.2.3.2.2 of the 2025 annual CREMP report, in response to CIRNAC requests, the relationship between dustfall chemistry and water chemistry was considered for evaluation in the 2025 CREMP and/or LSMP. Qualitative evaluation of potential spatial and seasonal patterns was also considered unreliable given the small dataset. These limitations precluded a meaningful assessment of potential linkages between dustfall deposition and water quality in 2025. This follows the intent of the holistic AEMP framework, allowing for multiple monitoring programs to contribute to receiving environment conclusions, As per the AEMP (Version 2), the Stream Diversion Barrier Study has been discontinued due to the reduced mining footprint associated with the ERP, which reduced stream diversions altogether. As per the AEMP (Version 2), Baffinland will initiate a Stream Diversion Barrier Study similar in scope to that described within the AEMP (Version 2) approximately one year prior to the start of the full production (rail) phase of the Project. Furthermore, given the diversion of surface water runoff from the Mine Haul Road towards SDLT-1 (as of 2021), flows are expected to increase at SDLT-1, thus limiting the risk of fish barriers from forming. **Baffinland considers this item (CIRNAC R-12) closed.**
R-13	13. Modifications related to KM105 Surface Water Management Pond (MS-11) (Schedule B, Item 22)	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	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.	CIRNAC's R-13 assessment does not accurately reflect the status of the KM 105 Facility or the information available through the NWB regulatory process. On May 6, 2026, Baffinland submitted a Notification of Construction supported by the **KM 105 Filter Berm and Final Discharge Point Detailed Design** and Issued for Construction drawings. The NWB distributed the Notification for public review on May 8, 2026, with comments due May 22, 2026; it received no comments. On June 4, 2026, the NWB accepted the Notification following the regulated comment process and, following completion of the process, confirmed that the proposed activity was consistent with the existing terms and conditions of Water Licence 2AM-MRY2540. The design package addresses the geotechnical and hydrotechnical matters raised by CIRNAC, including foundation conditions, slope stability, seismic and filter-failure scenarios, climate and extreme-rainfall considerations, conservative hydrologic sensitivity analyses, erosion protection, monitoring and maintenance. CIRNAC's

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		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.		remaining requests principally concern as-built drawings, the Construction Summary Report and finalized operating documentation, which are inherently post-construction deliverables. Those documents will be submitted following construction in accordance with Part D, Item 3 of the Licence. A full point-by-point reconciliation of CIRNAC R-13 is provided in **Attachment 4 – Detailed Response and Status Reconciliation for CIRNAC Recommendation R-13** Baffinland considers R-13 addressed, with implementation and post-construction reporting continuing through the approved regulatory process.
R-14	Monitoring Program Deficiencies (Schedule B, Item 25)	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.	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	Baffinland clarifies that Table 7.2 and Table 7.3 present tabular water quality data for all Schedule I SNP regulated monitoring sites active in 2025. a. Interpretation of water quality data generated under the SNP for regulated monitoring sites includes assessment of data to identify areas of non-compliance with the regulated discharge parameters, consistent with Part I, Item 19 (b. regarding the Monthly Monitoring Report, which states: "An assessment of data to identify areas of non-compliance with regulated discharge parameters referred to in Part F." In Table 7.2 and Table 7.3, water quality results that exceeded the applicable water quality criteria are flagged with bold font and fully discussed within the applicable text section of the annual report. Baffinland notes that the remainder of this comment extends beyond the scope of annual reporting requirements under Schedule B, Item 25, of the Water Licence, which indicates the Annual Report shall include: "Tabular summaries of the results and interpretation of all data generated under the Monitoring Program in Part I and Schedule I." b. Baffinland notes that comment b. also extends beyond the scope of annual reporting requirements under Schedule B, Item 25, of the Water Licence. Baffinland comprehensively reports tabular information of water quality and flow at all regulated Schedule I monitoring points on a monthly basis and through the existing Annual Report tables. c. Detailed summaries and full analysis are provided in the respective monitoring program reports included as appendices which form part of the annual report, satisfying the reviewer's request. Interpreting consultant reports to summarize monitoring programs and results risks misinterpretation of information and can

	Subject	Reviewer's Detailed Comment	CIRNAC Recommendations	Baffinland's Response
		• 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.	at each surface water and seepage monitoring location (as per CIRNAC R-20 in reference to the 2024 Annual Report; See Table A).	lead to missing qualifier information, in addition to creating unnecessary redundancy and an excessive level of information within the main text of the annual report. d. Baffinland will continue to assess its robust monitoring programs as construction occurs and/or operations activities change and adequately monitor site-specific surface runoff and effluents. Baffinland notes there is no licence requirement for groundwater monitoring at the Waste Rock Facility, and the Knight Piésold Ltd., Mary River Project, Groundwater Monitoring Program Review and Assessment, dated March 28, 2023, evaluated that the facility was not a priority location for groundwater monitoring on the Project. e. Management actions or responses triggered by monitoring results are described in the Annual Report, including the following: • Baffinland employed an adapted treatment strategy at the KM 105 Facility. New water management infrastructure, including a filter berm, was also constructed at the KM 105 Facility following adaptive management decisions. Continued upgrades and adaptive management improvements at the KM 105 Facility ensure discharged water meets water licence limits at the new approved discharge location, the details of which are fully summarized within the KM 105 End of Year summary (Appendix E.8.3). • Preventative measures for site sedimentation include infrastructure implemented under the Long-Term Water Management Plan, and adaptive management responses to water management and conveyance infrastructure, which included repairing and armouring water crossings, performing maintenance on ditching and constructing check dam structures. • Managing surface water drainage at the Project during freshet resulted in several instances where adaptive management responses were executed in 2025. The data generated from SNP stations and field observations made by personnel with or undergoing the CAN-CISEC designation allowed for Project-specific area actions for adaptive management. A summary of ESC measures implemented in 2025 along the Tote Road, including photos, is provided in the 2025 DFO Fish Habitat Monitoring Annual Report(Appendix C.3). • Baffinland conducted infrastructure- and process-specific investigations for potential sources of select elevated parameters from the CREMP and actioned corrective actions unidentified during the investigation. • Baffinland increased pumping capacities and installed pressure transducers to better track water balances in containment facilities

	Subject	Reviewer's Detailed Comment	CIRNAC Recommendations	Baffinland's Response
				• Baffinland performed adaptive management monitoring and completed corrective actions associated with external and internal spill reports • Baffinland performed event-based monitoring as per the SWEAMP to identify concerns to receiving environments during extreme weather events and deploy mitigative measures such as sedimentation and erosion controls. • Baffinland used its internal facility and infrastructure inspections to mitigate the potential for spills and releases, improve sedimentation mitigation measures and improve its waste management, sorting and disposal program. This list is a non-exhaustive list of adaptive management actions, and Baffinland references its management plans that contain adaptive management sections to guide its annual actions as required. Baffinland will continue to discuss adaptive management responses triggered by monitoring results in the annual report and supporting appendices. f. Table 7.7.1 – 7.7.5, Table 7.8.1 to 7.8.4, and Table 7.9 present the QA/QC sample data and analysis for the Schedule I SNP regulated monitoring sites, and associated analysis. Baffinland notes that the request to present all QA/QC data associated with all of the Project's monitoring programs extends beyond the scope of annual reporting requirements under Schedule B, Item 25. As such, Baffinland invites CIRNAC to submit an Information Request for detailed QA/QC raw data if QA/QC data beyond what is presented in the Annual Report tables referenced above is wanted. g. Baffinland notes that this comment extends beyond the scope of annual reporting requirements under Schedule B, Item 25. Baffinland also previously responded to this comment in 2025 in Appendix E.13.1 - 2025 Annual Report Intervenor Comments, in the response to CIRNAC comment R-20. That response stated: "Methodology for calculating flow rates and discharge volumes is provided in the Fresh Water Supply, Sewage, and Wastewater Management Plan. In addition, daily discharge volumes for Schedule I discharge points are already reported in the Annual Report tables, including Table 5.1 (Sewage), Table 5.3 (Containment Area Stormwater), and Table 5.4 (Surface Water Management Ponds Stormwater). At most discharge locations, discharge volume is measured using pump totalizers installed on the discharge systems, and these data are also reported through the monthly Water Licence reporting process. The exception is MS-11, where flow is determined using daily manual flow measurements during the initial thaw period, followed by calculation using a pressure transducer once site conditions allow. To improve clarity, Baffinland will expand the text in future reporting to more clearly describe the flow or discharge measurement methodology applicable to each

	Subject	Reviewer's Detailed Comment	CIRNAC Recommendations	Baffinland's Response
				relevant discharge location and to cross-reference the supporting tables where those data are reported." This was completed in the 2025 annual report, which included expanded text in Section 5.1.3 to describe the flow rate and/or discharge volume methodology applicable to each surface water management pond. As identified in Section 5.1.3, 2025 discharge data for Project surface water management ponds is provided in Table 5.4. Baffinland invites CIRNAC to submit an Information Request if additional information associated with flow rate/discharge volume methodology is wanted. **Baffinland considers this item (R-14) closed.**
R-15	WRF Progressive Closure (Schedule B, Item 27)	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.	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.	a. There was no QAQC drilling in 2025, as there has been no increase in the area of NAG waste rock placement during that period. As a result, no drilling was conducted, no samples were collected, and no assay results are available for 2025. This information has been presented in the quarterly Waste Rock Management Compliance reports, which are submitted to CIRNAC, QIA and the NWB. This is aligned with the methodology outlined in the Waste Rock Facility QAQC Monitoring Plan (Phase I WRMP, Appendix B). b. See response to a. c. All borehole geochemistry data are presented in the Annual Report under Appendix E.6.1., E.6.2., E.6.3. d. See response to a.
R-16	Plans / Reports / Studies related to Reclamation (Schedule B, Item 30)	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;	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;	Baffinland clarifies that Item 30 of Schedule B resulted from an administrative error in the renewed Water Licence, which erroneously separated item i. of the original Water Licence into two items: items 29 and 30. Item 30 is correctly part of Item 29, which should read: "A summary of any studies requested by the Board that relate to Waste disposal, Water use or Reclamation, and a brief description of any future studies planned." As indicated in Section 9.1 Summary of Studies Requested by the NWB, in 2025, studies were not requested by the NWB. Baffinland believes that the discussion of any future studies planned, as presented within their relevant subsection, sufficiently satisfies the reporting requirement.

	Subject	Reviewer's Detailed Comment	CIRNAC Recommendations	Baffinland's Response
		• 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.	(ii) scope and methodology (where available); (iii) relevance to closure planning, reclamation performance, or regulatory requirements; Clearly differentiate water-related studies and reclamation/closure studies as well as from general environmental monitoring programs; Explicitly link reclamation studies to key planning documents (e.g., ICRP, closure plans), demonstrating how results inform reclamation design, performance evaluation, or adaptive management; Provide a concise summary of the current ICRP (Revision 6), or include it as an appendix, with sufficient detail to contextualize associated reclamation studies; 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.	Baffinland notes that this comment extends beyond the scope of annual reporting requirements under Schedule B, Item 29, but invites CIRNAC to submit an Information Request if additional information beyond the (brief) description of any planned future studies is wanted. Baffinland also notes that Revision 6 of the ICRP was submitted as part of the 2024 Annual Security Review and Water Licence Renewal processes, and CIRNAC provided comments on this plan, including the closure research programs, in March and August 2025. Following this process, the ICRP was approved for use. As discussed in the Annual Report in Section 9.7 Reclamation Research, Revision 6 included an update to the research programs that will be completed to support reclamation planning for the Project. This section also notes that the proposed research programs are detailed in Appendix D of the ICRP and identifies the research program topics detailed in Appendix D. Baffinland will ensure, however, that a brief description of the future planned studies is also included within the report text in the applicable section(s) in future annual reports. **Baffinland considers this item (CIRNAC R-16) closed.**
R-17	Plans / Reports / Studies related to Water Use (Schedule B, Item 30)	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.	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.	Baffinland clarifies that Item 30 of Schedule B resulted from an administrative error in the renewed Water Licence, which erroneously separated item i. of the original Water Licence into two items: items 29 and 30. Item 30 is correctly part of Item 29, which should read: "A summary of any studies requested by the Board that relate to Waste disposal, Water use or Reclamation, and a brief description of any future studies planned." As indicated in Section 9.1 Summary of Studies Requested by the NWB, in 2025, studies were not requested by the NWB. With this additional context, discussion of the relevant studies and any future studies planned within their relevant subsection is logical, and Baffinland believes that it sufficiently satisfies the reporting requirement. **Baffinland considers this item (CIRNAC R-17) closed.**
R-18	Geochemical Analyses of Construction Material (Schedule B, Item 34 and Item 42)	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	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;	Baffinland acknowledges CIRNAC's recommendation and provides the following clarification regarding the applicable Water Licence reporting requirements and the geochemical characterization program used to support construction material management. Schedule B, Item 34 requires a summary of geochemical analyses conducted on applicable construction materials under Part D, Item 13, and Schedule B, Item 42

	Subject	Reviewer's Detailed Comment	CIRNAC Recommendations	Baffinland's Response
		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.	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.	requires monitoring data for geochemical analyses conducted on materials used to construct roads, quarries, and other infrastructure. These provisions do not prescribe a specific analytical suite, and as such, this recommendation is not within the scope of the annual reporting requirements found in either Schedule B of the Water Licence or the Management Plan. Baffinland's waste rock characterization and classification program is implemented through the approved Phase 1 Waste Rock Management Plan, which establishes the operational approach for identifying, classifying, and segregating waste rock during mining operations. The program classifies material as Non-Acid Generating (Non-AG) or Potentially Acid Generating (PAG) using established geochemical criteria developed from historical characterization completed since 2008 and supported by ongoing operational monitoring. Operational monitoring required within the Phase 1 Waste Rock Management Plan includes total sulphur and paste pH testing of blasthole cuttings to support ongoing verification of waste rock classification. In addition, select blasthole samples are submitted for off-site Acid Base Accounting (ABA) and Shake Flask Extraction (SFE) testing at a frequency of one sample per 40,000 tonnes of blasted waste material to further validate the classification criteria. Baffinland will include the results of ABA and SFE testing in future Annual Reports, apologizes for the clerical error of not including the ABA and SFE data outlined within the Phase 1 waste rock management plan, and will ensure the 2026 annual report includes the 2025 ABA and SFE data. With regard to the request in C/D), Baffinland notes that the material used for construction met the criteria outlined in the management plan (see section 4), and as such, Baffinland does not feel it necessary to commit to the requested supplementary information beyond what is provided in Table 9.3 for locations where waste rock was used for construction. This table will continue to be reported in the Annual Report to support CIRNAC request.
R-19	Mine Site Water Management Plan (Schedule B, Item 38)	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	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.	a. The Mine Site Water Management Plan (MSWMP) is a consultant report that proposes various measures and facilities for managing surface water and sedimentation impacts at the Mine Site, as a phased approach. Baffinland submitted the report to the NWB on June 30, 2021, as Modification No. 13. The MSWMP is the first step in completing the long-term plan, some of which will interact with proposed Steensby infrastructure. In 2026, Baffinland continued to advance long-term water management planning, taking into consideration alignment with Steensby-related infrastructure, follow-up to 2026 operational conditions and potential operational changes to the KM 105 infrastructure. This work will incorporate lessons learned and adaptive management implemented to date, and will support future updates to the long-

	Subject	Reviewer's Detailed Comment	CIRNAC Recommendations	Baffinland's Response
		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).		term Water Management Plan. Baffinland plans to update the management plan once Steensby infrastructure designs are near completion. b. As previously communicated, Baffinland will update and maintain the procedures set out in the applicable operating manuals and Management Plans to support the prevention of future spills associated with Modification No. 13 implementation. Baffinland also consistently reviews and updates the Project's management plans and operating manuals independent of the status of the items in Table 2.3 to ensure they remain relevant with changes in operations, with findings of monitoring, studies, and lessons learned, as part of an ongoing commitment to spill prevention. Updated plans under Part B, Item 17, of the Water Licence were submitted through the Public Hearing process in 2025 and include a revisions list detailing where significant content changes were made, as well as plans submitted as directed under the 2025 2AM- MRY 2540 Water Licence. c. As noted above in item a., the Mine Site Water Management Plan/long-term Water Management Plan is a consultant report, which outlines a proposed corrective action plan for surface water and sediment management at the Mine Site, and not a Management Plan under Water Licence Part B, Item 14/Schedule B, Item 38. All of the aspects of the corrective action Water Management Plan are addressed and implemented under Baffinland's Management Plans approved under the Water Licence as identified in Part B, Item 14.
R-20	Aggregate Usage (Schedule B, Item 39)	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.	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.	Baffinland notes that this comment extends beyond the scope of annual reporting requirements under Schedule B, Item 39, of the Water Licence, which indicates the Annual Report shall include: "Monthly and annual quantities of aggregates excavated and used from Quarries and Borrow Pits associated with the Licence" As required, volumes of aggregate excavated (and the various compositions, i.e. rock, organics, and unconsolidated material) are provided in the Table 3.3. Moreover, a full summary of material excavated from quarries is provided in Section 3.4 of the Annual Report.

Attachment 2:
Table 4: 2025 Annual Report QIA Comments No Response Justification

Table 4: 2025 Annual Report QIA Comments No Response Justification

Intervenor Comment No.	Comment or Recommendation	Justification for Recommended Exclusion from 2025 Intervenor Comments		
		Repetition of Comments in Other Regulatory Forum	Details Regarding Repetition	Outside of Annual Report Requirements – Baffinland's Suggested Approach & Notes for QIA
QIA NWB GGC #1	**Recommendation:** "Please provide available documentation, photographs of proposed and applicable repairs discussed within Appendix C.2, as well as estimated timing of referenced routine maintenance."	2024 NWB Annual Report Comment QIA GGC #1 2024 NIRB Annual Report Comment QIA GC #1	This is a repetitive comment previously responded to in the response to 2024 annual report comments. It also relates to an incorrect appendix referenced in the 2024 NIRB Annual Report comments.	As stated last year, Schedule B of the Water Licence does not include a requirement to provide the requested information related to geotechnical inspections in the Annual Report. Therefore, Baffinland suggests that QIA request this information prior to onsite visits or through an information request. Baffinland includes the annual geotechnical inspection report as an appendix to the annual report; therefore, it provides an annual update on the status of the third-party engineer's recommendations.
QIA NWB GGC #2	**Recommendation:** "Please provide the 2025 WRF Geotechnical Inspection Report."	QIA May Environmental Audit Information Request No.1 Item #5	The comment reiterates a question already addressed in a May 2026 Information Request. The applicable details are provided in that response.	The Water Licence does not require Baffinland to submit the referenced inspection report as part of its undertakings or for inclusion in the Annual Report. Baffinland has already fulfilled its obligations to complete and respond to a third-party assessment of earthworks and a geotechnical inspection of structures designed to contain water or waste, in accordance with Part D, Item 16, and Part I, Items 9–10 through the annual geotechnical inspection report from WSP. This is provided in Appendix C.2.
QIA NWB GGC #3	**Recommendation:** "Provide documentation of the lab testing data or literature which supports the material characteristics used in the stability assessment. To better understand risks associated with potential variations in materials, it is recommended sensitivity analyses be completed at lower strengths to verify that minimum recommended Factors of Safety are met."	2024 NWB Annual Report Comment QIA GGC #3 2024 NIRB Annual Report Comment QIA GGC #3 2024 QIA Environmental Audit Report QIA-1 and 5 2023 QIA Environmental Audit Report QIA-2	This is a repetitive comment previously responded to. In addition, this was previously identified as a repetitive comment in the October 2, 2025 "2024 Annual Report Intervenor Comments" response to the NWB. QIA requested information associated with the stability of the Waste Rock Pile slope in Environmental Audit Reports from 2024 and 2023. These comments were previously addressed fulsomely.	Baffinland would like to note that comments or recommendations of this nature can be appropriately addressed through an information request. This was previously noted in the October 2 "2024 Annual Report Intervenor Comments" response to the NWB and extend beyond the Schedule B reporting requirements.
QIA NWB GGC #4	**Comment:** Several repairs to the Tote Road are planned for the 2025 season, however, repair plans and schedule are not provided. **Recommendation:** "Please provide an outline of the recommended repairs outlined in Appendix C.3 which are to be completed for each planned repair and a high-level schedule of when they will occur."	2024 NWB Annual Report Comment QIA GGC #4 2024 NIRB Annual Report Comments QIA GGC #4	This is a repetitive comment previously responded to that relates to the 2024 Annual Report, Appendix C.3 Tote Road Report, Table C.3.1: 2024 Updated Tote Road Priority Item Action Schedule (for borrow pit remediation). For 2025, this table can be found in Appendix C.4 2025 Tote Road Priority Actions, Table C.4.1: 2026 Updated Tote Road Priority Item Action Schedule. While there is no formal requirement to provide a schedule; nevertheless, Baffinland provides an annual plan within the Annual report.	Baffinland has no regulatory requirement to provide this level of detail in the annual report. However, Baffinland includes the Tote Road Priority Item Action Schedule as an appendix to annual reports; therefore, an update is provided annually on the schedule and status of repairs. It should be noted the 2019 Tetra Tech plan that the schedule sources from is not a licenced document, rather a guiding document for ongoing progressive reclamation Additionally, the document referenced by QIA is slightly incorrect; the correct citation is Appendix C.4 Tote Road Priority Actions and Table C.4.1, located on pages 2–3.
QIA NWB GGC #7	**Recommendation:**	2026 Unscheduled Environmental Audit Information Request Item #4	Baffinland notes that CSR and As-Built drawings with the design criteria for each facility designed to contain, withhold, divert or retain waters or wastes at the Mary River Project have previously been provided to the NWB and QIA	This comment extends beyond the scope of annual reporting requirements under Schedule B of the Water Licence and Section 6.4 of the Commercial

Intervenor Comment No.	Comment or Recommendation	Justification for Recommended Exclusion from 2025 Intervenor Comments		
		Repetition of Comments in Other Regulatory Forum	Details Regarding Repetition	Outside of Annual Report Requirements – Baffinland's Suggested Approach & Notes for QIA
	"Baffinland should clarify the return period of storm event that water management infrastructure is engineered for on the project site."		following completion of each facility in accordance with the Water Licence and Commercial Lease requirements. In addition, in response to the QIA's information request made in support of the 2026 Unscheduled Environmental Audit (email communication, dated June 2, 2026), management designs and plans for all water management facilities currently at the Mary River Project were provided to the QIA in June 2026 as Attachment 3 of Baffinland's June 15, 2026 letter Response to Information Request – 2026 Unscheduled Environmental Audit.	Lease Agreement. Please refer to previous annual reports and/or communications where this information has been shared.
QIA NWB GGC #8	**Recommendation:** "Baffinland should conduct spawning habitat assessments during the preceding summer to any planned water withdrawals so that there is sufficient time for NWB/QIA to review and comment, and for potential re-location of sites if necessary."	Licence Renewal QIA-TR-10	The nature of this comment is repetitive A summary of the status of Baffinland's commitment was provided in Appendix E.12.2 Public Hearing Commitments Progress Summary Table in the 2025 NWB-QIA Annual Report.	This comment extends beyond the scope of annual reporting requirements under Schedule B of the Water Licence and Section 6.4 of the Commercial Lease Agreement. Baffinland will provide aquatic habitat information collected at the proposed water intake sites, as committed to during the Water Licence Renewal Hearings. These details will be submitted to the Board for review and acceptance at least sixty (60) days prior to construction as outlined in Part D, Item 2 and Part E, Item 23 of the Water Licence. This item will be addressed once detailed design for the Steensby component is finalized and prepared for NWB review.
QIA NWB TE#1	**Comment:** For borrow pits 14, 14A, 41, and 71 Baffinland notes that "To verify reclamation success and compliance with closure objectives, the borrow pit will be inspected in 2026, and a drone survey will be conducted to assess whether any significant settlement has occurred." (p. 3). Baffinland does not provide further details of the inspection or drone survey methods, and as a result QIA cannot assess whether these surveys will be sufficient to verify reclamation success and compliance with closure objectives. **Recommendation:** QIA requests that Baffinland provide the following details for the inspection and drone surveys: • Metrics that will be collected as part of the surveys • Spatial extent of the surveys • Date and time of the surveys • Qualifications of staff undertaking the surveys	N/A	N/A	This comment extends beyond the scope of annual reporting requirements under Schedule B of the Water Licence and Section 6.4 of the Commercial Lease Agreement.Baffinland invites the QIA to visit the reclaimed borrow pit sites during future onsite inspections to verify reclamation success and compliance with the closure objectives directly. The reclamation objectives follow the criteria within the approved ICRP.

Intervenor Comment No.	Comment or Recommendation	Justification for Recommended Exclusion from 2025 Intervenor Comments		
		Repetition of Comments in Other Regulatory Forum	Details Regarding Repetition	Outside of Annual Report Requirements – Baffinland's Suggested Approach & Notes for QIA
QIA NWB TE#3	**Recommendation:** Baffinland should explain what steps will be taken to improve dust suppression throughout the project area. In particular, Baffinland should demonstrate how more thorough and consistent coverage of the entire Tote Road will be achieved for calcium chloride application so that areas identified as generating large amounts of dust are eliminated.	2026 May 14 Information Request Item No.3 2025 June QIA Inspection Report Item No. 8 2024 NWB Annual Report Comment QIA TE #3 2024 June QIA Inspection Report Item No. 5 2023 June QIA Inspection Report QIA-3 2023 September QIA Environmental Inspection Item #3 Licence Renewal comment QIA-TR-5	QIA has highlighted its concerns about dust generation along the Tote Road; however, many of its recommendations (improving water truck availability, implementing early notification systems, improving suppressant coverage, regular truck washing, vegetation assessments, etc.) have previously been implemented or investigated for feasibility. As such, inspectors have noted reduced dust where dust suppressant is applied. Baffinland recently finalized and implemented two (2) SOPs with regard to dust suppression tracking and management protocols. In addition, on August 31, 2026, Baffinland received authorization from the NWB for water withdrawal limits for dust suppression to be administered as an average of 1,500 m3/day, rather than fixed maximum volumes applicable to each individual withdrawal location per day. The change provides additional operational flexibility for dust suppression activities along the Tote Road moving forward.	These are follow-up questions that can be and are qualified through inspection discussions and information requests with QIA and their consultants during the inspection process. It should be noted that the most recent information Request from QIA on September 15 referenced dramatically improved dust suppression conditions which sourced from the summer QIA inspection observations. This request also extends beyond the scope of annual reporting requirements under Schedule B of the Water Licence and Section 6.4 of the Commercial Lease Agreement.
QIA NWB AE#5	**Recommendation:** **3rd bullet:** • Ensure future reporting structures are designed to directly support the objectives of effects assessment and alignment with the AEMP/TARP framework.	N/A	N/A	This comment extends beyond the scope of annual reporting requirements under Schedule B of the Water Licence and Section 6.4 of the Commercial Lease Agreement. In addition, Baffinland clarifies that the TRMP is not part of the AEMP/TARP framework. The evaluation criteria, action levels, and response framework used to interpret TRMP results and initiate actions are summarized in the Project's Roads Management Plan and SWAEMP. The TRMP uses action levels as internal management triggers to initiate defined investigation and corrective action steps. Action levels are not effluent limits and do not, on their own, indicate non-compliance. When action levels are met, the Project implements the response actions summarized in Table 9.5 TRMP Action Levels and Response Actions (Summary) of the SWAEMP to (a) confirm data quality and natural drivers, (b) identify potential Project-related sources, and (c) implement timely mitigation and follow-up monitoring where warranted.
QIA NWB AE#10	**Recommendation:** QIA supports the recommendations for additional hydrometric site visits throughout future seasons to verify the operation of data loggers and perform flow measurements, and continued targeting of low flow and/or high flow periods -- particularly extreme peak flow, to maintain and further validate the rating relationships.	NWB/QIA 2024 Annual Report Comment AE#17 NWB/QIA 2023 AEMP #2 NWB/QIA 2022 SNP #1	This is a repetitive comment previously responded to. In addition, this was previously identified as a repetitive comment in the October 2, 2025 "2024 Annual Report Intervenor Comments" response to the NWB. Baffinland's 2024 response was: Baffinland has previously provided detailed responses outlining monitoring methods, station setup, seasonal reconnaissance, site visit schedule, third-party quality control, and the practical/safety limitations of accessing sites during high flows. The hydrometric program has not materially changed since	Comments about changing aspects of management plans can be address during the review process for the respective management plan (AEMP in this instance), and not within the Annual Report review process. For the reviewer's information, Baffinland is undertaking efforts to increase the number of additional hydrometric site visits in response to rainfall events at high-priority hydrometric stations (hydrometric stations that respond significantly to rainfall events). However, as many hydrometric sites are only helicopter accessible, and due to helicopter flight restrictions in inclement weather, this is often after peak flows have occurred and subsided.

Intervenor Comment No.	Comment or Recommendation	Justification for Recommended Exclusion from 2025 Intervenor Comments		
		Repetition of Comments in Other Regulatory Forum	Details Regarding Repetition	Outside of Annual Report Requirements – Baffinland's Suggested Approach & Notes for QIA
			those clarifications, and the information provided in 2022 and 2023 remains applicable.	
QIA NWB AE#46	**Comment:** Appendix E.11 stated that "concerns have been previously raised about a potential liner leak in the northwest section of the HWB; as a result, this section is currently not being used to contain hazardous waste." (P. 12). It was unclear if BIM had a plan to repair this section of the HWB. **Recommendation:** Baffinland should provide details on when and how the HWB liner leak will be repaired.	2025 NIRB Annual Report Comments QIA WQS #24 2024 NIRB Annual Report Comments QIA WQ#4	This is a repetitive comment previously responded to. Furthermore, it has been noted continually in the annual third-party geotechnical inspections (submitted as appendices each year to the annual report) that the cessation of use is the corrective action to address concerns of the HWB-1 potential liner leak discovered in 2016 and 2017. Long-term corrective actions include continued monitoring and remediation if required upon closure of the facility. Currently this is a requirement of Baffinland's closure plan for all HWB's. HWB-1, as shown in Appendix D.1 Mine Site Photo Journal (photos 69 and 70) and in Appendix C.2 Geotechnical Inspection Report (Appendix A Photographs, figure 16) of the 2025 annual report, remains empty and has not been used for years.	N/A

Attachment 3:
Detailed Reconciliation of Historical CIRNAC Annual Report Recommendations identified in 2025 CIRNAC R-01

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From:	Baffinland Iron Mines Corporation
Title:	**Detailed Reconciliation of Historical CIRNAC Annual Report Recommendations identified in 2025 CIRNAC R-01**
Date:	October 1, 2026

1.0 Purpose

CIRNAC's 2025 R-01 identifies thirteen recommendations from its reviews of Baffinland's 2023 and 2024 Annual Reports as either "Not Addressed" or "In Progress." CIRNAC relies on those classifications to assert that there has been a continued lack of progress and that the listed matters indicate ongoing non-compliance with Water Licence 2AM-MRY2540. Baffinland notes that the annual report review process forms a technical review of the Project and that CIRNAC's compliance enforcement branch has yet to engage Baffinland on interpretations of the technical reviewer.

This table reconciles each historical recommendation against:

- Baffinland's October 2, 2025 response to the 2024 Annual Report comments;
- Baffinland's dedicated October 15, 2025 response to CIRNAC R-01;
- Appendix E.13.1 and its dedicated narrative response submitted with the 2025 Annual Report; and
- Information contained in the 2025 Annual Report and its supporting appendices.

The reconciliation distinguishes between:

- Whether Baffinland has responded to a recommendation;
- Whether CIRNAC agrees with the response;
- Whether the underlying physical or technical work remains underway;
- Whether the matter has been superseded by a current recommendation; and
- Whether the matter represents a demonstrated failure to comply with a specific Licence requirement.

A recommendation should not remain classified as "Not Addressed" because a response was provided in an earlier submission rather than repeated in Appendix E.13.1. Similarly, a recommendation should not remain independently open where the same matter has been expressly carried forward into a current recommendation.

2.0 Detailed Reconciliation

Historical item	CIRNAC's current characterization	Reconciliation with Baffinland's previous responses	Requested disposition
2023 R-07 — Confirmation of Permafrost Degradation / Remedial / Maintenance Activities	"In Progress" because reclamation activities continue along Tote Road disturbed areas.	Baffinland previously explained that the 2019 Tetra Tech plan remains an overarching action plan; however, it is not a licenced document, but rather a guiding document for ongoing progressive reclamation. The annual geotechnical inspections completed by WSP serve as recurring condition surveys through the licence of waste and water retention facilities (not including conveyance structures). Deficiencies identified through those inspections are assessed and prioritized through annual work planning. Baffinland also reported that it was working with Nunami Stantec to evaluate road and crossing designs that minimize permafrost impacts. The 2025 Annual Report documents continued reclamation at KM 97, reclamation of four historic borrow pits totalling 22,702 m^2, and three additional borrow-area remediations planned for 2026.	**Response complete; implementation ongoing.** The continued existence of an annual reclamation program is not evidence that the recommendation was not addressed. Close the historical recommendation and track future work through the established annual geotechnical inspection, priority-action and reclamation reporting processes.
2023 R-20 — Reported Spills	"In Progress," with references to subsequent spill recommendations.	Baffinland's October 15, 2025 response stated that reportable incidents are investigated for root cause and corrective actions; that Baffinland has an internal incident-investigation process incorporating root-cause analysis; that this process could be referenced in the next Spill Contingency Plan update; and that corrective actions are documented in follow-up spill reports submitted to CIRNAC and QIA and included in the Annual Report. CIRNAC's current Table A expressly directs the reader to the later spill-reporting recommendations, demonstrating that the historical matter has been carried forward.	**Response complete and superseded.** Any residual concern should be addressed under recommendations following follow-up spill reports. It should be noted that CIRNAC compliance and inspection closes off historical spills with Baffinland while on the Project during inspections. The historical item should not continue to be counted independently.
2023 R-26 — Permafrost Storage as Main Mitigation Strategy	"In Progress," with a reference to 2024 R-06.	Baffinland explained that the climate-change component had been addressed through the ICRP and was superseded by the more recent climate-scenario recommendation. Baffinland also responded to the specific BH1 temperature concern: warmer rock-fill temperatures were observed locally at BH1 between July 2020 and April 2021, but a similar variation was not observed at BH2 or BH3, indicating that the event was localized rather than representative of widespread pile warming.	**Response complete and superseded by 2024 R-06.** Completion of future thermal modelling may remain an implementation activity, but 2023 R-26 should not remain independently open; rather, it represents a difference in opinions for Industry Standard Practice
2024 R-04 — Quantities of Seepage/Runoff at the WRF	"Not Addressed." CIRNAC states that there was no Baffinland response and that seepage and runoff volumes were not reported in the 2025 Annual Report.	The statement that no response was provided is incorrect. Baffinland's October 2, 2025 response directed CIRNAC to Section 7.3 and explained that water collected from the WRF through the perimeter ditching ultimately reports to the WRF Pond and is accounted for through discharge monitoring at MS-08. Baffinland further clarifies that the Licence terminology must be applied through an evidence-based attribution process. Water observed downgradient of a facility is considered facility-derived seepage where evidence establishes or reasonably supports that the water drained through, escaped from or originated within the facility or its managed footprint. Attribution may be established through tracer testing, observed hydraulic connectivity, an identified release pathway, or a reasonably comparable chemical signature. Spatial proximity alone is insufficient, particularly where flows occur concurrently with freshet, rainfall runoff or active-layer mobilization. Facility-derived runoff collected through water-management infrastructure is measured and reported through the applicable discharge-monitoring records and should not be counted a second time as a separate seepage volume. Confirmed uncontrolled seepage that bypasses a managed discharge point is quantified or reasonably estimated where practicable.	**Response provided and now further clarified.** Close the historical recommendation. Any future concern should identify the specific observed flow that CIRNAC considers confirmed facility-derived seepage beyond a controlled Facility capture point, the basis for that attribution, and why the flow is not already accounted for through the applicable discharge record. The current "no response" characterization should be corrected.

Historical item	CIRNAC's current characterization	Reconciliation with Baffinland's previous responses	Requested disposition
2024 R-06 — Climate Change Scenario	"In Progress." CIRNAC acknowledges that Baffinland plans to complete two-dimensional thermal modelling in 2026 using multiple climate-change scenarios, with results to be incorporated into a future ICRP.	Appendix E.13.1 confirms that Baffinland agrees that a range of scenarios is appropriate, has identified two-dimensional WRF active-layer modelling as the next technical step, and has scheduled the work for 2026. CIRNAC's own current note therefore recognizes both the planned work and the schedule.	**Response complete; implementation ongoing.** The requested next step and schedule have been provided. The historical item should not be used as evidence of a lack of progress or non-compliance. Completion of the model can be tracked through the ICRP review and submission process.
2024 R-09 — Waste Rock ARD Classification	"In Progress," with references to 2025 R-17 and R-19.	Appendix E.13.1 explains that Table 9.2 was a summary of the WRF QA/QC drilling program, while cover thickness was formally confirmed through signed and stamped quarterly QA/QC reports and certified survey elevations. The WSP technical memorandum provided additional third-party review, and the ABA and SFE results were included with the analytical results appended to the quarterly reports. Additional interpretive tables and figures were also provided in the 2025 Annual Report. Baffinland therefore expressly considered the item closed. CIRNAC's current references appear incorrect: the relevant current subjects are R-18, Geochemical Analyses of Construction Material, and potentially R-20, Aggregate Usage—not current R-17 and R-19.	**Response complete; any residual issue is superseded by current recommendations.** Remove the historical item. Any specific remaining geochemical-data concern should be assessed under the applicable current recommendation and licenced requirements under the Phase 1 Waste Rock Management plan.
2024 R-10 — Hazardous Waste Generation	"Not Addressed." CIRNAC states that no response was provided in Appendix E.13.1, while acknowledging that the 2025 Annual Report included a backhaul report.	Baffinland directly responded on October 2, 2025, referring CIRNAC to the outbound manifests in Appendix E.4 and committing to provide clearer volume reporting within future Annual Reports. The 2025 Annual Report then included a dedicated Waste Backhaul Report, which CIRNAC acknowledges in its own current table. Any remaining concern about monthly and annual generation tracking is now addressed through current R-04, Hazardous Waste Generation Tracking. It should also be noted that the explicit Schedule B reporting requirement is to provide monthly and annual volume in cubic metres of Hazardous Waste generated and transported from the Project sites to a Licensed facility outside of Nunavut for treatment; not a backhaul report with further information.	**Response complete and superseded by current R-04.** The historical item should be removed. CIRNAC's statement that there was no response should be corrected because it disregards the October 2, 2025 submission and the information provided met Schedule B reporting requirements.
2024 R-12 — Spill Description and Identification Number 2024-367/478	"Not Addressed." CIRNAC states that no response was provided in Appendix E.13.1.	Baffinland directly responded on October 2, 2025. Baffinland explained that the event was initially assigned Spill ID 2024-367 on the online spill database, but that the displayed identifier had changed to 2024-478 when the follow-up report was prepared. Both identifiers were reported to avoid further confusion. Baffinland also separately identified Spill Report 2024-366 as the MP-05 overtopping event and explained that Table 6.2 followed the established QIA lease operations template and reported the date of occurrence.	**Response complete.** A possible future clarification to the table heading does not justify retaining the historical item as "Not Addressed." Remove the item from future historical tracking.
2024 R-13 — Actions to Address Inspection Reports — Spills	"Not Addressed." CIRNAC states that no response was provided in Appendix E.13.1.	Baffinland directly responded on October 2, 2025. It explained that the release identified during the inspection occurred within a lined facility, involved a small quantity below external reporting thresholds, was remediated, and resulted in internal corrective actions.	**Response complete; interpretation disputed.** Close the historical response-tracking item. Where CIRNAC maintains that the occurrence was required to be included as an unauthorized discharge, it should identify the particular Licence provision and objective reporting criterion supporting that conclusion; however, it should be noted that the release was below external spill reporting criteria and occurred within a lined facility.

Historical item	CIRNAC's current characterization	Reconciliation with Baffinland's previous responses	Requested disposition
2024 R-16 — Unauthorized Discharge Reporting for Spills — Water Quality Exceedances	"In Progress." CIRNAC acknowledges that spills and exceedances were reported but states that the linkage was unclear. It refers the reader to 2025 R-09.	Baffinland's October 2, 2025 response provided the requested incident-specific information for Spill 2024-193. It identified the May 27, 2024 sampling event, reported a TSS concentration of 16 mg/L, compared the result with both MDMER and then-applicable Water Licence criteria, and identified the May 30, 2024 downstream result. It also cross-referenced the information for Spill 2024-151. The issue is therefore not a lack of response but CIRNAC's preference for a consolidated spill-to-monitoring-results table. CIRNAC's cross-reference also appears incorrect: the applicable current unauthorized-discharge recommendation is R-10, not current R-09, which concerns dustfall.	**Response complete; residual presentation request superseded by current R-10.** Close the historical item and address any prospective table-format improvement under the current recommendation. It should also be noted that this is a format recommendation, not a matter of Schedule B reporting criteria.
2024 R-18 — KM105 Surface Water Management Pond Performance	"In Progress." CIRNAC acknowledges that the mitigation approach has progressed from conceptual to partially designed but states that a comprehensive plan remains incomplete. It refers to current R-12.	Baffinland's October 2, 2025 response described the measures already installed and operating in 2025: polymer dosing at the Mine Haul Road ditch inflow, a proof-of-concept filter berm, downstream polishing and settling, and silt curtains. Baffinland also described continued regulatory monitoring, engineering of the final discharge point and future as-built reporting. The earlier October 15, 2025 response documented the grout-curtain attempt, including approximately 500.36 m^3 of grout injected into 29 holes and the engineering decision to discontinue that approach and focus on water management within the KM105 valley. CIRNAC's current note therefore acknowledges actual progress. Its cross-reference should also be corrected: KM105 is addressed by current R-13, not current R-12.	**Response complete; engineering implementation ongoing.** Close the historical item and track any remaining engineering, authorization and as-built requirements under current R-13. The item does not support an allegation of continued lack of progress. Baffinland continues to progress and improve KM 105 water management infrastructure, for which there is no explicit requirement for what infrastructure constitutes in the licence.
2024 R-19 — Alternative Remediation Methods for Hydrocarbon-Impacted Soils	"In Progress." CIRNAC acknowledges that a qualified consultant has been retained and that development of a northern-appropriate Landfarm Operations Plan and performance-verification program is scheduled for 2026.	Appendix E.13.1 provides the requested schedule and scope. It confirms that the consultant's work will include an operating plan, a performance-verification and sampling program and soil characterization during the 2026 field season. It should also be noted that contaminated soil quantities are reported annually and secured through the ASR securities review process, and making annual progress is not explicitly required, although Baffinland endeavours to do so.	**Response complete; implementation ongoing.** CIRNAC requested a schedule and the schedule was provided. Close the historical reporting recommendation and track delivery of the resulting plan through the appropriate plan or annual-report process
2024 R-20 — Schedule I Monitoring Requirements	"In Progress." CIRNAC states that flow-calculation methodology and confirmation of monitoring frequency and parameters remain unclear. It refers to current R-13.	Appendix E.13.1 provides a detailed response. It explains that flow and discharge methodologies are described in the Fresh Water Supply, Sewage and Wastewater Management Plan; daily quantities are reported in Tables 5.1, 5.3 and 5.4 and in monthly Water Licence reports; most discharge volumes are measured using pump totalizers; and MS-11 flows are established through daily manual measurements during initial thaw followed by hydrology pressure-transducer calculations. It also explains that Schedule I sampling applies when discharge occurs and provides the specific rationale for the absence of Schedule I sampling at MS-07 in July 2024. Section 5.1.3 was revised to improve that explanation. CIRNAC's cross-reference should also be corrected: current Monitoring Program Deficiencies is R-14, not current R-13.	**Response complete; any residual presentation request is superseded by current R-14.** Remove the historical item and assess any request for an additional station-by-station summary under a current recommendation.

3.0 Summary of Reconciliation

Recommended disposition	Historical items
Close as responded	2024 R-04, R-12 and R-13
Close as responded and superseded by current recommendations	2023 R-20 and R-26; 2024 R-09, R-10, R-16 and R-20
Close the historical response item while tracking implementation through an established process	2023 R-07; 2024 R-06, R-18 and R-19

The thirteen items are not accurately characterized as having received no response. For several items, CIRNAC may continue to disagree with Baffinland's technical position or may reasonably track completion of underlying technical work through subsequent annual report submissions or other reporting mechanisms. Those circumstances do not make the response absent and do not independently demonstrate non-compliance. Many of these items also go well beyond the explicit regulatory reporting Water Licence No: 2AM-MRY2540 Schedule B scope.

4.0 Process Issues Identified

The reconciliation also identifies several recurring issues with CIRNAC's current tracking table.

Submitted responses are omitted from the assessment.

- Current Table A states that no response was provided for 2024 R-04, R-10, R-12 and R-13, notwithstanding direct responses in Baffinland's October 2, 2025 submission.

Response status is conflated with implementation status.

- The continued implementation of reclamation, thermal modelling, KM105 engineering or landfarm planning does not mean that Baffinland failed to answer the recommendation. A recommendation may be fully responded to while the underlying physical or technical program remains underway.

Historical and current recommendations are duplicated.

- Several historical items are expressly cross-referenced to current recommendations addressing the same subject. Retaining both matters as independently unresolved allows the same issue to be counted twice, prevents an effective pathway to closure and results in confusion.

Several current cross-references appear incorrect:

- 2024 R-09 should refer to current R-18 and potentially R-20, rather than R-17 and R-19;
- 2024 R-16 should refer to current R-10, rather than R-09;
- 2024 R-18 should refer to current R-13, rather than R-12; and
- 2024 R-20 should refer to current R-14, rather than R-13.

CIRNAC has not established item-specific closure criteria.

- The tracking table does not consistently state the information still missing, why a previous response was rejected, the particular Licence condition allegedly unmet, or the objective deliverable that will result in closure. Many of the items center around extended requests for CIRNAC-interpreted industry standards while the request is not grounded in Licence-specific wording. Baffinland provides extensive feedback to Annual Report Intervenor Comments and continues to go above and beyond licence requirements for the volume of information it provides annually.

For those reasons, the continued presence of an item in CIRNAC's tracking table should not, by itself, be relied upon as evidence of not addressed or non-compliance.

Attachment 4:
Detailed Response and Status Reconciliation for CIRNAC Recommendation R-13

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From:	Baffinland Iron Mines Corporation
Title:	**Detailed Response and Status Reconciliation for CIRNAC Recommendation R-13**
	KM 105 Surface Water Management Facility (MS-11)
Date:	October 1, 2026

1. Purpose and Scope

This attachment provides Baffinland Iron Mines Corporation's detailed response to Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) Recommendation R-13 concerning modifications to the KM 105 Surface Water Management Facility (MS-11). It reconciles CIRNAC's July 15, 2026 observations with the previous regulatory record, the adaptive management measures implemented at KM 105, the detailed engineering submitted to the Nunavut Water Board (NWB), and the remaining construction and post-construction deliverables.

The attachment is intended to provide the full accounting-style response supporting the concise summary included in Baffinland's main response table. It distinguishes between information and documents that already existed when CIRNAC issued its review, infrastructure that had been accepted through the applicable Water Licence notification process but not yet constructed, and documents that are inherently dependent on completion and commissioning of the completed works. It should be noted that Baffinland submits a comprehensive end-of-year supplemental monitoring summary to ECCC, CIRNAC and QIA for MS-11 and KM 105 Water Management Facility annually. The 2025 report was submitted with the annual report on March 31st.

Key conclusion

CIRNAC's statement that no design modification reports had been provided did not accurately reflect the regulatory record available on July 15, 2026. Baffinland submitted a modification request on March 31 2025 for MS-11 to relocate the compliance monitoring point downstream of all water management mitigation measures which was accepted through the annual report review process. Following this, Baffinland submitted a detailed geotechnical and hydrotechnical design and Issued for Construction drawings to the NWB on May 6, 2026 and on June 4, 2026, the NWB accepted Baffinland's Notification of Construction and confirmed that the proposed activity was consistent with the existing terms and conditions of Water Licence 2AM-MRY2540. The NWB expressly clarified that its acceptance was not intended as a representation regarding the suitability of the plans or as third-party verification of the design, engineering, construction or planning described in the Notification. As-built drawings and the Construction Summary Report are post-construction deliverables and are not due or capable of completion until finalization of construction.

2. CIRNAC R-13 and Baffinland's Overall Position

CIRNAC recognized that KM 105 had evolved from its original retention-and-release configuration to an adaptive, flow-through treatment system incorporating flocculation, filtration, settling, polishing and a relocated final discharge point. CIRNAC nevertheless stated that no design modification report, updated Operations, Maintenance and Surveillance (OMS) document or as-built report had been provided, and requested a robust system capable of withstanding an extreme climatic event and associated sediment loading.

Baffinland agrees that the KM 105 system is a significant water-management feature and that the completed engineered configuration must be supported by appropriate design, construction, operating and maintenance documentation. Baffinland does not agree, however, that the record demonstrates an

absence of design or progress. The system had advanced from adaptive proof-of-concept work to detailed engineered design and NWB construction acceptance before CIRNAC issued R-13. The remaining documents requested by CIRNAC are tied to construction completion and commissioning and will be provided through the applicable Water Licence process.

3. Regulatory and Technical Chronology

Date / Period	Milestone	Relevance to CIRNAC R-13
June 2022	Original KM 105 Facility commissioned	The original retention-and-release system was constructed to provide settling before discharge but did not perform as intended.
Q1-Q2 2024	Grout-curtain remediation attempted and strategy changed	Approximately 500.36 m3 of grout was injected through about 29 holes. On July 2, 2024, Baffinland and Tetra Tech concluded that the approach was not technically reliable and shifted to water-management and treatment measures within the KM 105 valley.
2023-2026	Annual Due Diligence Monitoring Reports	Supplementary Annual monitoring reports submitted voluntarily to outline monitoring results and progress on the Facility.
2024-2025	Adaptive proof-of-concept system implemented	Polymer dosing, a non-engineered filter berm, downstream settling/polishing, silt curtains, armouring, and related controls were implemented and monitored under actual site conditions.
March 31 2025	MS-11 SNP Modification Request	Submitted an MS-11 SNP modification request to relocate the compliance monitoring point downstream of all Water Management infrastructure. This modification prepared the monitoring location for future water management infrastructure approved through the NWB review process.
2025 reporting year	Performance reported in Annual Report	The Annual Report documented one marginal TSS exceedance, rapid return to compliant results and continued compliant performance while flow was present.
May-July 2026	Detailed design, NWB acceptance of Construction Notification and CIRNAC review	Nunami Stantec completed the Detailed Design on May 1. Baffinland submitted the design and IFC drawings on May 6 and received NWB acceptance of construction notification on June 4. CIRNAC issued R-13 on July 15 while stating that no design modification report had been provided.

4. Point-by-Point Reconciliation of CIRNAC R-13

The following table addresses each substantive element of CIRNAC's comment and recommendation against the information previously reported, the May 2026 Detailed Design and the prescribed regulatory sequence for remaining deliverables.

CIRNAC issue	Regulatory and technical record	Baffinland response	Disposition / next step
Change from retention-and-release to a distributed flow-through system	Baffinland repeatedly reported that the original retention-based configuration did not perform as intended, that the attempted grout-curtain remediation was unsuccessful, and that the treatment strategy was revised in consultation with third-party engineers and water-treatment specialists. The 2025 Annual Report described the new passive, multi-stage flow-through approach.	The change was an evidence-based adaptive-management response, not an undocumented departure from engineering. Field performance was deliberately evaluated before permanent components were finalized, reducing the risk of committing to another rigid solution that did not reflect site conditions.	Response complete. The engineered configuration was subsequently formalized through the May 2026 Detailed Design and June 2026 NWB public review and acceptance.
New treatment components and reported effectiveness	The reported treatment train includes polymer dosing, flocculation, the proof-of-concept filter berm, downstream settling and polishing, silt curtains, armouring and erosion controls. The Detailed Design concluded significant sediment capture, supporting the conclusion that the proof-of-concept system captured substantial flocculated sediment. It should also be noted that while the historical dam does seep, it captures sediment effectively behind the structure.	The adaptive system served its intended purpose by establishing effective treatment mechanisms under actual freshet and operating conditions and by generating site-specific information for the permanent design.	Response complete. Continue performance monitoring and incorporate commissioning results into final operating documentation.
Whether flows report to the polishing pond and final discharge point or bypass the system	The Detailed Design locates the FDP downstream of the KM 105 treatment infrastructure and downstream of a natural pond that collects outflow from the MS-C-F Pond. The modelled FDP catchment includes the 246.7 ha KM 105 filter-berm catchment and an additional 93.1 ha upslope area. The FDP is identified as the first downstream location where combined flow can be accurately measured.	The design purpose is to consolidate managed outflow to a representative monitoring and measurement location that is well downstream of the seepage observed at the km 105 dam infrastructure. Baffinland will continue field inspection for any separate, sustained facility-derived pathways that have the potential to bypass the new discharge location for MS-11.	Design response complete; operational verification ongoing once construction of new MS-11 discharge point is complete.
Geotechnical stability and the downstream erosion / "boiling" observation	The Detailed Design evaluates the new engineered filter berm under end-of-construction, long-term, filter-failure, geotextile-interface, and concludes that the assessed scenarios meet the selected design criteria. It also addresses foundation materials, ice-rich ground, permafrost disturbance, pore-pressure monitoring and construction inspection.	The Design Report addresses stability of the new filter berm but is not a separate dam-safety assessment of the localized observation downstream of the original KM 105 Dam. The planned Filter berm does meet criteria for dam- safety assessment. The annual geotechnical inspection evaluated the dam and will evaluate the upcoming engineered filter berm. CIRNAC's suggested progression to dam instability is not identified in the available record as a conclusion of the annual Geotechnical inspection.	Continue annual geotechnical inspection, monitoring and maintenance.
Statement that no design modification report was provided	Baffinland submitted a SNP modification request for the new MS-11 discharge point on March 31st 2025. Nunami Stantec issued the BIM KM 105 Filter Berm and Final Discharge Point Detailed Design on May 1, 2026. Baffinland submitted the design and IFC drawings to the NWB on May 6, 2026 and received acceptance of the construction notification on June 4, 2026, following a public review period.	CIRNAC's July 15, 2026 statement did not accurately reflect the regulatory record. A detailed design had been submitted, publicly reviewed, and accepted by the NWB before the CIRNAC review was issued.	Consider the design-report component of R-13 fully addressed.
Request for as-built documentation	The planned filter berm and FDP construction had not yet been completed when CIRNAC issued its review. Under the Water Licence, as-built drawings and the Construction Summary Report follow completion of construction.	Final as-builts cannot precede construction. Baffinland will submit the Construction Summary Report and as-built documentation within the applicable post-construction timeframe.	Implementation of construction planning and scheduling remains in progress.
Request for an updated OMS document	The Detailed Design includes specific operating surveillance and maintenance criteria: water-level monitoring, a 3m elevation-differential trigger, sediment-removal criteria, geotextile replacement, pre- and post-storm inspection, repair of erosion or settlement and response to potential seepage pathways.	These design requirements provide the technical basis for final OMS content. A final OMS should reflect the actual as-built and commissioned configuration rather than a theoretical or pre-construction arrangement.	Update or finalize OMS following construction and commissioning, while continuing existing procedures and design-based inspection requirements in the interim.
Need for a robust system capable of extreme climatic events and sediment loading	The design incorporates climate-change considerations, conservative hydrologic initial conditions, snowmelt-filled reservoirs, a 55% catchment sensitivity increase, 1-in-100-year erosion-protection design, assessment through the 1-in-200-year FDP flow, and analysis using a 1-in-2,475-year seismic event. Controlled overtopping is incorporated if the filter becomes blocked.	The general concern had already been translated into specific engineer-selected return periods, conservative assumptions, sensitivity cases, erosion protection, structural provisions and maintenance triggers. An undefined requirement to withstand any "extreme" event is not an objective design criterion.	Design response complete. Construction planning and scheduling remain in progress.
Repeated historical comments and status tracking	KM 105 design, seepage mitigation, construction status, monitoring and documentation have been raised in successive CIRNAC reviews. Baffinland has documented the original failure, grout-curtain attempt, strategy change, adaptive measures, proof-of-concept results, detailed design, and construction notification.	The issue is not an absence of plan or schedule. Historical recommendations should be superseded by the accepted construction notification and eventual post-construction reporting process rather than retained as independently unresolved matters.	Close historical KM 105 response items; track only construction and commissioning.

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5. Adaptive Management and Proof-of-Concept Treatment

The adaptive measures implemented at KM 105 were not an unplanned substitute for engineering. They were a deliberate response to the failure of the original retention-based configuration and the technical limitations encountered during grout-curtain installation. The approach allowed Baffinland to evaluate treatment performance under actual northern conditions before committing to a permanent configuration.

The proof-of-concept treatment train included polymer dosing at the upstream inflow, flocculation and initial settling, filter berms, downstream polishing and settling, silt curtains, armouring, check dams and other erosion and sediment controls. The 2025 Annual Report documented that, after one marginal TSS exceedance during freshet not associated with effluent but rather dust entrained snow adjacent, results returned below the applicable criterion and remained compliant while flow was present.

Nunami Stantec compared 2022 and 2025 aerial information and concluded significant sediment capture after implementation of the proof-of-concept berm and polymer flocculation. The engineering team concluded that it supported advancement of the treatment concept into an engineered design.

6. Detailed Engineering Submitted to the NWB

The May 1, 2026 Nunami Stantec report is a detailed geotechnical and hydrotechnical design, not a preliminary concept note. It was prepared by geotechnical and water-resource engineers, reviewed by professional engineers, and accompanied by Issued for Construction drawings issued separately. Baffinland submitted the package to the NWB on May 6, 2026 and following a public review period, received acceptance of the notification on June 4, 2026, authorizing commencement of construction.

6.1 Geotechnical Design

The geotechnical design includes review of available 2021 and 2023 subsurface investigations, characterization of coarse overburden, suspected frozen silt and clay, bedrock and localized organics, and specific requirements for foundation preparation. It directs removal of unsuitable materials, proof rolling, protection of subgrades and minimization of disturbance to ice-rich and permafrost materials.

Slope-stability analyses were completed for upstream and downstream slopes under end-of-construction, long-term, filter-failure, geotextile-interface and loading conditions. The report concludes that the proposed berm meets the selected factors of safety for the assessed scenarios. The conservative downstream filter-failure sensitivity case produced a factor of safety of 1.23 and was considered acceptable as a temporary condition where a maintenance response is available to restore flow through the berm.

The filter berm design applies a 1-in-2,475-year seismic loading case and recommends qualified geotechnical inspection. It also recommends consideration of vibrating-wire piezometers and thermistors to verify foundation conditions should annual geotechnical observations recommend instrumentation monitoring and observations note changing permafrost conditions.

6.2 Hydrotechnical and Extreme-Event Design

The hydrotechnical design includes Project-specific design criteria, precipitation-frequency analysis through the 200-year return period, climate-change consideration, snowmelt assessment, and conservative water-storage conditions. The modelling assumes reservoir-filling snowmelt immediately preceding a design rainfall event and includes a sensitivity case that increases the filter-berm catchment area by approximately 55% to account for uncertainty and potential future routing changes.

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The filter-berm crest and erosion protection were designed using the 1-in-100-year, 24-hour rainfall event. The configuration permits controlled overtopping if filtration becomes blocked while maintaining water below the existing KM 105 Dam spillway elevation. Riprap sizing and downstream apron requirements were developed from the modelled design flow.

The MS-11 discharge point incorporates an 18-inch Parshall flume with a nominal measurement range of 5 to 700 L/s. The selected range exceeds the modelled 10-year discharge, and the reinforced concrete casing and associated construction are intended to resist frost heave and erosive forces during flows above the flume's rated measurement capacity. The overall hydrotechnical assessment evaluates discharge outflow through the modelled 200-year event.

6.3 Flow Capacity, Clogging and Controlled Overtopping

The design transparently recognizes that the selected geotextile and bedding arrangement will require maintenance. The theoretical flow analysis indicates that the filter berm is well suited to typical operating flows even with substantial reduction in effective filtration area. Under the modelled combinations of water level and effective filter area, the berm may also convey the 10-year and 100-year design flows.

The crest provides a controlled overtopping pathway in the hypothetical case of filter blockage. The design therefore does not depend on perfect, uninterrupted filtration during every event; it combines treatment capacity, hydraulic conveyance, overtopping protection, monitoring and maintenance as complementary controls.

6.4 Monitoring and Maintenance Framework

Although a final OMS document should follow the as-built and commissioned configuration, the Detailed Design already provides a substantive operating surveillance and maintenance framework. These recommendations provide the technical basis for interim surveillance and will be considered for the finalized OMS documentation to be completed following construction and commissioning.

7. Flow Routing and Potential Bypass

CIRNAC asked whether all flow reports through the polishing pond and MS-11 discharge point or whether some water bypasses the treatment system. The Detailed Design addresses the intended collection and measurement arrangement by locating the discharge point downstream of the treatment infrastructure and well downstream of the seepage observed at the km 105 dam infrastructure adjacent to a natural settling pond that collects outflow. The design identifies this as the first downstream location where flow can be safely and accurately sampled and metered.

The modelled discharge point catchment totals approximately 339.8 ha, comprising the 246.7 ha KM 105 filter-berm catchment and an additional 93.1 ha upslope area. This arrangement is intended to capture the combined system outflow rather than only a narrow surface channel. Baffinland will nevertheless continue to inspect the facility for flows that have the potential to bypass the new discharge location for MS-11.

8. Existing KM 105 Dam Geotechnical Observation

Baffinland acknowledges CIRNAC's reference to erosion and a localized “boiling” phenomenon where water emerges downstream of the original KM 105 Dam. The transition to a multi-stage flow-through system reduces reliance on prolonged retention behind the original dam as the sole sediment-treatment mechanism. CIRNAC's suggested progression to dam instability is not identified in the available record as a conclusion of the annual Geotechnical inspection. The Dam will continue to be inspected through the annual geotechnical inspection for waste and water retention structures.

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The Nunami Stantec Detailed Design directly evaluates the stability of the new engineered filter berm and associated discharge point infrastructure.

Baffinland will continue annual geotechnical inspections and incorporate the planned engineered filter berm into the inspection program.

9. Summary of CIRNAC Review Items

Requested / relevant item	Status as of CIRNAC review	Required next step
Proof-of-concept treatment system	Implemented and monitored; performance informed the permanent design.	Continue monitoring until permanent components are commissioned.
Detailed design modification report	Completed May 1, submitted May 6.	Consider this component of CIRNAC R-13 fully addressed.
Issued for Construction drawings	Prepared and submitted separately with the design package.	Use for construction, subject to approved field changes.
Engineered filter berm and FDP construction	Accepted by NWB, with confirmation of consistency with the Licence.	Complete construction and commissioning.
As-built drawings	Not available before completion of construction.	Submit with the Construction Summary Report following completion.
Construction Summary Report	Post-construction deliverable.	Submit the Construction Summary Report following completion
Final OMS documentation	Final content depends on the as-built and commissioned configuration.	Finalize or update after construction and commissioning; reference design-based monitoring criteria in the interim.
Geotechnical inspection and monitoring	Ongoing.	Continue annual inspection
Extreme-event design basis	Completed within the May 2026 Detailed Design.	Verify construction and operational performance through inspection, monitoring and maintenance.

10. Repetitive Historical Comments and Requested Disposition

CIRNAC has raised substantially similar questions about KM 105 design, seepage mitigation, implementation schedules, as-built information and operating status in successive Annual Report reviews. Baffinland has responded by documenting the original performance limitation, the grout-curtain attempt, the engineering decision to discontinue that approach, the adaptive treatment measures, proof-of-concept performance, relocated monitoring, detailed design, notification, review, and acceptance of construction plans.

The current status and responses to date do not document an absence of response, plan or progress. It is the transition from an adaptive proof-of-concept treatment system to reviewed and accepted construction of engineered infrastructure. Historical KM 105 recommendations should be considered superseded by the accepted construction plan process and the prescribed post-construction reporting requirements. They should not continue to be retained as independent evidence of unresolved non-compliance.

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Requested disposition

Baffinland considers CIRNAC R-13 addressed. Baffinland submitted a modification request on March 31, 2025, for MS-11 to relocate the compliance monitoring point downstream of all water management mitigation measures, which was accepted through the annual report review process. Baffinland submitted the detailed KM 105 design and construction notification on May 6, 2026. The NWB publicly circulated the Notification, received no submissions during the review period, including from CIRNAC which forms approval recommendations, and accepted it on June 4, 2026, as consistent with the existing terms and conditions of the Water Licence. CIRNAC's statement that design modification information had not been provided therefore does not accurately reflect that record. The remaining as-built, Construction Summary and finalized operating documents will be submitted at the prescribed post-construction stage.

Attachment 5:
Review of the Dustfall Monitoring Program

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Memorandum

To:	Baffinland Iron Mines Corporation
From:	EDI Environmental Dynamics Inc.
Date:	October 1, 2026
Project No:	25C0127
RE:	**REVIEW OF THE DUSTFALL MONITORING PROGRAM**

Introduction

This memorandum provides a review of the Dustfall Monitoring Program at the Mary River Project, addressing specific items highlighted in recent project discussions. The information is presented in greater detail in the Mary River Project Terrestrial Environment annual reports, most recently *Mary River Project Terrestrial Environment 2025 Annual Monitoring Report* (EDI Environmental Dynamics Inc. 2026). The Dustfall Monitoring Program has two major components: (1) passive field-based dustfall monitoring and (2) desktop/remote sensing imagery analysis. This memorandum outlines sample design, project assumptions, and data collection methods and a comparison of dustfall results against FEIS baseline predictions. Finally, it includes responses to specific items raised by CIRNAC during recent hearings.

Dustfall Monitoring Program

Passive Dustfall Monitoring | Sample Design and Data Collection Methods

The passive dustfall monitoring program comprises the permanent deployment of 43 passive dustfall samplers across the Project Development Area (PDA) and regional boundaries for collecting and measuring dustfall following standard test methods (ASTM International 2010). They include:

- **Mine Site:** Nine monitors are deployed, including three within the mine footprint (Near sites), four outside the footprint but within a 5,000 m buffer (Far sites), and two Reference sites located over 14,000 m away from any Project infrastructure.
- **Milne Port:** Ten monitors are active, with four located directly on the port site footprint, five at the PDA boundary, and one Reference site approximately 3,000 m northeast.
- **Tote Road:** Twenty-two monitors are deployed along the roadway, including two main transects perpendicular to the centreline (at KM 28 and KM 78) spaced at 30 m, 100 m, 1,000 m, and 5,000 m

distances on either side of the road. Three pairs of monitors are situated at a 1,000 m distance (at KM 25, KM 56, and KM 75), and two Reference monitors sit 14,000 m southwest of the road right-of-way.

Data collection involves passive dustfall samplers affixed to approximately 2-m-tall posts anchored to solid ground. Canisters are changed every 28 to 31 days (roughly monthly) and sent to ALS Environmental Laboratories to analyze total insoluble dustfall and metal concentrations. Canisters are pre-charged with an algaecide solution during summer and an isopropyl alcohol solution during winter to prevent freezing. Sampling occurs year-round at a targeted subset of stations within 1,000 m of the PDA, while more distant stations are sampled primarily from June through October when conditions allow safe access.

Remote Sensing Imagery Analysis | Experimental Design and Analysis

The dustfall imagery analysis uses satellite imagery, which is an effective tool for mapping dust extent on snow because dust stands out clearly against the landscape. Since dust and snow reflect and absorb light differently, satellite sensors can detect these differences across various wavelengths, such as visible and infrared. By comparing these light values using band ratios (e.g. the Snow Darkening Index), computers can automatically identify and separate dust from snow in the images. A limitation of the methods presented in the report is the potential misclassification of image pixels as dust due to bright south-facing slopes and exposed rock/ground. Band ratios can also provide an estimate of relative dust concentrations and show a pattern of dust distribution across the landscape; however, they are sensitive to fluctuating light and snow. Such environmental shifts reduce the accuracy of dustfall estimates because a single concentration level can produce varying band ratio values. Using these methods, spatial variability and temporal trends are monitored over the late winter period (mid-March to mid-May).

Program Assumptions and Review

Calculating dustfall accumulation from passive deposition rates assumes no redistribution of dust after its initial deposition. It also relies on estimating the specific multi-day period over which the dust accumulation occurs. The Mary River dustfall monitoring program follows a standardized methodology, adapted as necessary for implementation in the Arctic; for example, the algicide media in the sample jars is replaced with isopropyl alcohol during the winter months in effort to prevent freezing. The passive dustfall program was found to be insufficient to fully capture dustfall extents on the landscape, largely due to limitations associated with laboratory detection limits. Satellite imagery analysis was included in the monitoring program starting in 2020 to provide an additional tool to evaluate dustfall extent.

The current monitoring program produces defensible data used to evaluate changes in Project activities and potential effects on the receiving environment. Estimates of dustfall (i.e., representing a Project disturbance facture) is commonly cross-referenced when response factors, such as vegetation, birds, and terrestrial wildlife. When data from all disturbance and response factors are combined, they are sufficient to evaluate dust impacts on land and water. In addition, dustfall monitoring data are used to support and inform dustfall suppression activities on site.

Comparison of Dustfall Monitoring Results with Predictions

Recognizing that the FEIS predictions were determined using a modeling approach, that comes with inherent uncertainty, the annual dustfall results have been compared against the Final Environmental Impact Statement (FEIS) baseline predictions and presented in annual terrestrial monitoring reports. Baseline models predicted that annual total suspended particulate (TSP) deposition levels would exceed 50 g/m²/year within the PDA and decrease toward background levels beyond the project footprint. Annual dustfall over the years, as measured from the passive dustfall program, was consistent with these predictions in all years, though with absolute dustfall that was slightly higher than predicted at some locations, particularly along the Tote Road. The table below presents a detailed station-by-station comparison of the 2025 measured annual passive dustfall amounts against the baseline FEIS model predictions.

Table 1. Comparison of 2025 passive dustfall annual dustfall[1] against FEIS modelling predictions.

Site	Area	Predicted Range[2]	Isopleth Upper Limit	Annual Dustfall (g/m²/year)	EIS Prediction Comparison
DF-M-01	Mine Site	High	N/A[3]	107.72	Consistent with FEIS prediction
DF-M-02	Mine Site	High	N/A[3]	63.62	Consistent with FEIS prediction
DF-M-03	Mine Site	High	N/A[3]	74.02	Consistent with FEIS prediction
DF-M-04	Mine Site	Low	4.5	5.29*	Above prediction by a slight margin
DF-M-05	Mine Site	Low	4.5	5.58*	Above prediction by a slight margin
DF-M-06	Mine Site	Moderate	50	20.03*	Consistent with FEIS prediction
DF-M-07	Mine Site	Moderate	50	20.11*	Consistent with FEIS prediction
DF-M-08	Mine Site	Moderate	50	12.18*	Lower than FEIS prediction
DF-M-09	Mine Site	Moderate	50	14.02*	Lower than FEIS prediction
DF-P-03	Milne Inlet Port	Low	4.5	2.98*	Consistent with FEIS prediction
DF-P-04	Milne Inlet Port	Low	4.5	10.6	Above prediction
DF-P-05	Milne Inlet Port	Moderate	50	43.15	Consistent with FEIS prediction
DF-P-06	Milne Inlet Port	Low	4.5	7.75	Above prediction
DF-P-07	Milne Inlet Port	Moderate	50	6.44	Much lower than FEIS prediction
DF-P-08	Milne Inlet Port	Moderate	50	20.09	Lower than FEIS prediction
DF-P-09	Milne Inlet Port	Moderate	50	7.22*	Much lower than FEIS prediction
DF-P-10	Milne Inlet Port	Moderate	50	20.93*	Consistent with FEIS prediction
DF-P-11	Milne Inlet Port	Moderate	50	4.02*	Much lower than FEIS prediction
DF-P-12	Milne Inlet Port	Moderate	50	5.5*	Much lower than FEIS prediction
DF-RN-01	Road North	Low	4.5	4.67*	Above prediction by a slight margin
DF-RN-02	Road North	Low	4.5	3.84*	Consistent with FEIS prediction
DF-RN-03	Road North	Moderate	50	41.5	Consistent with FEIS prediction
DF-RN-04	Road North	Moderate	50	93.86	Above prediction
DF-RN-05	Road North	Moderate	50	153.35	Above prediction
DF-RN-06	Road North	Moderate	50	70.66	Above prediction
DF-RN-07	Road North	Low	4.5	7.57*	Above prediction
DF-RN-08	Road North	Low	4.5	3.69*	Consistent with FEIS prediction

Site	Area	Predicted Range[2]	Isopleth Upper Limit	Annual Dustfall (g/m²/year)	EIS Prediction Comparison
DF-RS-01	Road South	Low	4.5	3.62*	Consistent with FEIS prediction
DF-RS-02	Road South	Low	4.5	7.09*	Above prediction
DF-RS-03	Road South	Moderate	50	76.87	Above prediction
DF-RS-04	Road South	Moderate	50	335.5	Above prediction
DF-RS-05	Road South	Moderate	50	208.84	Above prediction
DF-RS-06	Road South	Moderate	50	64.02	Above prediction
DF-RS-07	Road South	Low	4.5	4.36*	Consistent with FEIS prediction
DF-RS-08	Road South	Low	4.5	3.28*	Consistent with FEIS prediction
DF-RR-01	Tote Road	Low	4.5	1.37*	Consistent with FEIS prediction
DF-RR-02	Tote Road	Low	4.5	1.38*	Consistent with FEIS prediction
DF-TR-25E	Tote Road	Low	4.5	7.12*	Above prediction
DF-TR-25W	Tote Road	Low	4.5	4.97*	Above prediction by a slight margin
DF-TR-56E	Tote Road	Low	4.5	7.25*	Above prediction
DF-TR-56W	Tote Road	Low	4.5	5.6*	Above prediction by a slight margin
DF-TR-75E	Tote Road	Low	4.5	5.71*	Above prediction by a slight margin
DF-TR-75W	Tote Road	Low	4.5	7.71*	Above prediction

[1] Annual accumulations are reported for the period from January 18, 2025, to January 4, 2026.

[2] FEIS Predictions were based on pre-project dust dispersion models. Low range is <4.5 g/m²/year, moderate range is between 4.6 and 50 g/m²/year, and high range is > 50 g/m²/year. The 'high' range does not have an upper limit; sites modelled in the high category are predicted to have >50 g/m²/year of total suspended particulate matter (dustfall).

* Extrapolated (winter) dustfall predictions were added to the observed dustfall amount. The amount added to the observed quantity was inversely proportional to the number of sampling days (i.e., lower total sampling days resulted in greater amounts added to observed dustfall quantities).

Row shading indicates that the measured annual dustfall exceeded the FEIS-predicted annual dustfall.

Response to CIRNAC Commentary and Requests

In a March 11 – 12, 2025 Water Licence Renewal hearings in Pond Inlet Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) requested that Baffinland Iron Mines Corporation provide recommendations for improving the Dustfall Monitoring Program.

Request 1: *Ensure that dustfall samples are tested for the analytes identified in WL Schedule I. Conditions Applying to General and Aquatics Effects Monitoring Table 12: Monitoring Group Parameters.*

Response: Dustfall sampling canisters provide a rate of dustfall settling and — while the laboratory results following the standardized method for dustfall canister analysis do include metals data — the data are provided in units of mg/dm².day (consistent with dustfall), not as a concentration measured in mg/kg. Therefore, the original program data were not comparable with sediment or water quality standards.

However, the Project consulted with ALS Environmental in late summer 2023 to determine if metal concentrations dustfall to support the analysis of contaminant loadings to surface water via dustfall could be provided. ALS was able to develop a laboratory analysis method and provide these data for those sites with higher rates of dustfall (ie, had sufficient dustfall to support additional analysis). Data collection for metals

analytes, in units of mg/kg, identified in WL Schedule I began in September 2023. Other parameters listed in Table 12 including biological oxygen demand, lethality, hydrocarbons, nutrients, etc., cannot be measured in dustfall samples.

Request 2: *Continuous monitoring for dust around the Project Area, including at Deposit No. 1.*

Response: The Project currently conducts continuous monitoring of PM2.5 and TSP (i.e., dust) at the Mine Site Complex (MSC) since December 2021 and at the Weatherhaven (fenceline) since November 2025. Results are reported in the Annual Air Quality, Dustfall, and Meteorology reports. Additionally, while passive dustfall monitoring is not considered continuous monitoring based on industry standards, the nature of the monitoring program yields continuous data (i.e., data collected over a full 30-day period as opposed to data simply representative of that period). It is of note that regulatory agencies and industry practices do not consider dustfall as a parameter requiring continuous monitoring in contrast to PM2.5 and TSP (https://www.ontario.ca/document/operations-manual-air-quality-monitoring-ontario-0/data-validation-and-reporting).

Request 3: *Installation of additional passive monitors at a greater distance from the mine to capture the broader regional impacts of dust, including up and down wind of prevailing winds.*

Response: Daily dustfall deposition rates at stations 1,000 m from mine infrastructure consistently register less than 1.0 mg/dm^2/day with geometric means below 0.5 mg/dm^2/day across all sampling areas. All results from monitoring sites located 5,000 m and 14,000 m away have returned dustfall values below the laboratory detection limit in all samples over 10 years of data collection. Broader regional dustfall patterns are investigated via satellite imagery analysis, which maps dustfall extent and snow darkening across the wider landscape.

Request 4: *Inclusion of snow core sampling to support dustfall monitoring and chemical characterization data and that snow is tested for the analytes identified in WL Schedule I.*

Response: The project currently carries out a Surface Snow Sampling Pilot Study during late winter (early May). Only the surface snow is sampled because the satellite imagery represents the surface snow conditions at the time the image is captured. This ongoing sampling is building the dataset required to develop a mathematical relationship between ground-level dust concentrations (measured as total suspended solids) and the satellite-derived Snow Darkening Index (SDI).

Note: In 2024, ground-truthed snow samples matched Landsat acquisition dates across a broad range of concentrations, providing calibration data to build the relationship. In 2025, overcast weather prevented the calculation of usable satellite index values, meaning no imagery was available to correlate with the snow samples.

Closure

The following EDI Environmental Dynamics Inc. team members contributed to this memorandum:

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