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Arctic Bay

January 5th, 2016

David Hohnstein
Director Technical Services
Nunavut Water Board
18831-18A Avenue

Edmonton, AB

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Re:

Cape Dorset

Mr. Hohnstein,

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QIA Comments, Interim Closure and Reclamation Plan, 2AM-MRY1325

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The Qikiqtani Inuit Association (QIA) would like to thank the Nunavut Water Board (NWB) for providing the opportunity to present comments on Baffinland Iron Mines Corporation's Interim Closure and Reclamation Plan (ICRP).

In accordance with Section 12.1, of Commercial Production Lease (CPL) Q13C301 which states the ICRP "require[s] the approval of the Landlord acting reasonably prior to

submission of such plans to Governmental Authorities". QIA is hereby notifying the NWB

that on October 23rd, 2015 QIA issued BIMC a conditional approval of the ICRP, with direction to BIMC on how to achieve complete approval from QIA.¹ This correspondence is

attached to provide context for the benefit of the NWB. Here QIA would like to highlight

that the comments submitted to BIMC in October 2015 are an extension of the same comments that have been supplied to BIMC in March 2015 and Fall 2014. Submission of

QIA technical comments to BIMC have also followed in-person meetings, notably during a

Furthermore, QIA notes that the ICRP has yet to gain QIA approval since the ICRP

(BAF-PH1-830-P16-0012, Rev.2) was first presented on July 2nd, 2014.² In other words, despite repeated efforts on behalf of QIA to direct the proponent on where to improve

the ICRP such improvements have yet to occur to a complete or satisfactory level. Aside

from the current NWB request for comments there are other implications for not having a

series of meetings in January, June and August 2015.

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%⊳∠∆ናጋ% Resolute Bay ¹ QIA letter to BIMC titled: Baffinland Iron Mines Corporation's Interim Mine Closure and Reclamation Plan – Conditional Approval. October 23rd, 2015.

くっとうる% Sanikiluaq ² QIA letter to BIMC, copied to the Nunavut Water Board titled: Interim Mine Closure and Reclamation Plan, Section 12.1 Commercial Production Lease (Q13C301). July 29th, 2014

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completed ICRP such as; continued conditional compliance with Q13C301, limitations on all parties when assessing financial security cost estimates under the Annual Security Review, administrative and subject specific complications relative to future water licence amendment applications (i.e. type-A amendments in relation to the Phase II Project Proposal).

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QIA will continue to work with BIMC to bring the ICRP into compliance with Q13C301. Additionally, QIA does not deem "conditional approval" as a meaning required edits can be prolonged indefinitely. QIA believes its direction to BIMC has been reasonable in nature, consistent with existing guidelines in other northern jurisdictions, and aligned with planned document revision timelines. QIA pledges to advise the NWB if and when there is a change to the status of the ICRP under Q13C301.

Sincerely,

Stephen Williamson Bathory

S.W. Bathory

Director, Department of Major Projects

CC – Erik Madsen, Baffinland Iron Mines Corporation

Attachments: QIA letter to BIMC titled: Baffinland Iron Mines Corporation's Interim

Mine Closure and Reclamation Plan - Conditional Approval. October

23rd, 2015.



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October 23, 2015

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Mr. James Millard, M.Sc., P.Geo. Environmental Manager Baffinland Iron Mines Corporation 2275 Upper Middle Road East, Suite 300 Oakville, ON L6H 0C3

Mr. Millard,

RE: BAFFINLAND IRON MINES CORPORATION'S INTERIM MINE CLOSURE AND RECLAMATION PLAN – CONDITIONAL APPROVAL

The Qikiqtani Inuit Association (QIA) provides this letter outlining its response to the Baffinland Iron Mines Corporation's (BIMC) latest submission of revisions to the Interim Mine Closure and Reclamation Plan (ICRP) and cover letter, as submitted to the QIA on October 16, 2015¹. This letter is submitted in accordance with Section 12.1, of Commercial Production Lease (CPL) Q13C301 which states the ICRP "require[s] the approval of the Landlord acting reasonably prior to submission of such plans to Governmental Authorities". BIMC is required to submit an updated ICRP to the Nunavut Water Board (NWB) within 60 days of the amended approval date of September 2, 2015.

To support BIMC's upcoming submission timeline, QIA provides this letter outlining it's continued conditional approval of the ICRP document, subject to the terms established in March 2015^{2,3}, which are scheduled to be completed throughout 2015. At present, BIMC has partially satisfied these terms by way of completing specific updates made to the ICRP prior to their March 31, 2015 submission³, and participation in focused ICRP review events throughout 2015 in order to address deficiencies associated with key closure topics identified by QIA's review of the ICRP Revision 3. Currently, there remains one outstanding term of the conditional approval to be completed in the remainder of 2015 includes the following:

• BIMC's submission of a revised ICRP which addresses all deficient items listed herein as outlined in QIA review comments by December 31st, 2015².

It is noted that BIMC's October 16th ICRP submission has made revisions to address QIA's review comments regarding most deficiencies; however, a preliminary review of the document identified some items which had not been adequately addressed (e.g. predicted residual impacts) and others for which no revisions appear to have been made (e.g. closure activities, reclamation research, signature/stamp of a registered professional, updated Figure 3-1). For this reason, a detailed

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¹ BIMC's October 16, 2015 letter and attachments to QIA titled, Commercial Lease No. Q13C301: Submission of Draft Preliminary Document for QIA Review – Interim Closure and Reclamation Plan (ICRP), BAF-PH1-830-P16-0012, Rev 4.

² The QIA's March 5, 2015 letter to BIMC titled "Review of Baffinland Iron Mines Corporation's Interim Closure and Reclamation Plan, Revision 3.

³ BIMC's March 19th, 2015 letter to QIA titled, Baffinland Iron Mines Corporation Response to Qikiqtani Inuit Association March 18, 2015 letter regarding the terms for Interim Closure Reclamation Plan, Rev 3 Approval.



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トσΡ⊃Φ® Sanikiluaq review of the entire document was not attempted during this relatively short timeline (one week). A summary of the preliminary review is presented in Table 1 below.

QIA is available to discuss any questions BIMC may have regarding the findings of the preliminary review, the initial ICRP review comments from March 2015, and/or BIMC's expected timeline for submission of a completed draft ICRP (Revision 4) prior to the December 31, 2015 deadline, as per the ongoing conditional approval.

Sincerely,

Justin Buller

Assistant Director
Department of Major Projects
Qikiqtani Inuit Association



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Table 1. Summary of ICRP deficiencies and revision status based on QIA's preliminary review.

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$\nabla_{r} V \triangleleft_{c} \prec_{r}$	1.	Closure objectives (general)	Completed
Arctic Bay	2.	Closure objectives (Area specific-Tote Road)	Completed
ρ∾∖∟∆ ^c Cape Dorset	3.	Closure objectives (Area specific-Railway, Steensby Port Site)	NA
ხ∿Ր∜ეს∧ა Clyde River	4.	Closure criteria	TBD. Will require detailed review.
⊲▷≀∆⊆>% Grise Fiord	5.	Closure activities	No revisions appear to have been made to address the deficiency.
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Igloolik Δ%⊸Δ ^c	8.	Summary of Predicted Residual Impacts	Partially addressed. No changes to address recent review comments appear to have been made.
Iqaluit PLT>C Kimmirut	9.	Reclamation Research Plan	No revisions appear to have been made to address the deficiency. Most notably, the agreed upon AANDC guidelines do not appear to have been considered.
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Pond Inlet	11.	Post Closure Monitoring Programs (Scope)	Appears to be completed. Detailed review required prior to approval.
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		organization and spelling/grammar are present.
14.	Figure 3-1	No revisions appear to have been made to address the deficiency.
15.	Short-term temporary mine closure – care and maintenance	Appears to be completed. Detailed review required prior to approval.

Notes:

Bold/Italic: Deficiencies not addressed, as identified during preliminary review of the submitted ICRP.

Item Numbers and Topic are consistent with QIA's March 5, 2015 letter to BIMC summarizing ICRP deficiencies. Additional detail regarding the specific deficiency, and QIA's recommendations for review are available in the letter².