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Qikiqtani Inuit Association

January 5th, 2016

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Serving the
communities of

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$\rho^{\alpha,\alpha}\Delta^c$
 Cape Dorset

Clyde River

Grise Fiord

Hall Beach

$\Delta^L \supset \tau^b$
Igloolik

$\Delta^b \rightarrow \Delta^c$
Iqaluit

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Kimmirut

$\langle \sigma^a \sigma^b \rangle_Q$
Pangnirtung

Pond Inlet

Qikiqtarjuaq

Resolute Bay

Sanikiluaq

David Hohnstein
Director Technical Services
Nunavut Water Board
18831-18A Avenue
Edmonton, AB
T5T 5B4

Mr. Hohnstein,

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

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 series of meetings in January, June and August 2015.

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

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

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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October 23, 2015

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Sanikiluaq

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 its 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

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.



Sanikiluaq

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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|---|--|---|---|
| ᐃᖅᐱᐃᖅ Arctic Bay | 1. | Closure objectives (general) | Completed |
| | 2. | Closure objectives (Area specific-Tote Road) | Completed |
| ᐃᓐᓴᐃᖅ Cape Dorset | 3. | Closure objectives (Area specific-Railway, Steensby Port Site) | NA |
| ᑲᖅᖃᑲᐃᖅ Clyde River | 4. | Closure criteria | TBD. Will require detailed review. |
| ᐃᖅᐱᐃᖅ Grise Fiord | 5. | Closure activities | No revisions appear to have been made to address the deficiency. |
| ᐱᓐᓴᐃᖅ Hall Beach | 6. | ICRP signed by a qualified professional registered with NAPEG. | No revisions appear to have been made to address the deficiency. |
| | 7. | Summary of pre-development conditions | Appears to be completed. Detailed review required prior to approval. |
| ᐃᖅᐱᐃᖅ Igloodlik | 8. | Summary of Predicted Residual Impacts | Partially addressed. No changes to address recent review comments appear to have been made. |
| ᐃᖅᐱᐃᖅ Iqaluit | 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. |
| ᐱᓐᓴᐃᖅ Kimmirut | 10. | Post Closure Monitoring Programs (Duration and rationale) | Appears to complete pending inclusion of predicted residual impacts as supporting information. Detailed review required prior to approval. |
| ᐱᓐᓴᐃᖅ Pangnirtung | 11. | Post Closure Monitoring Programs (Scope) | Appears to be completed. Detailed review required prior to approval. |
| ᐱᓐᓴᐃᖅ Pond Inlet | 12. | Concordance Tables | Appears to be completed. Detailed review required prior to approval. |
| ᐱᓐᓴᐃᖅ Qikiqtarjuaq | 13. | Document formatting | Document submitted for review is not a final draft as admitted by BIMC. Similar issues with formatting, |
| ᐱᓐᓴᐃᖅ Resolute Bay | | | |
| ᐱᓐᓴᐃᖅ Sanikiluaq | | | |

