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June 28, 2017

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トーΡレム% Sanikiluaq Robin Ikkutisluk Licence Administrator Nunavut Water Board P.O. Box 119 Gjoa Haven NU XOB 1JO

Ms. Ikkutisluk,

RE: BAFFINLAND IRON MINES CORPORATION'S, MARY RIVER PROJECT, 2017 WORK PLAN ADDENDUM

On June 6¹, 2017, the Nunavut Water Board (NWB) requested interested parties' comments regarding Baffinland Iron Mines Corporation's (Baffinland) 2017 Work Plan addendum². This letter represents Qikiqtani Inuit Association's (QIA) comments.

As the Designated Inuit Organization for the Qikiqtani region, QIA and Baffinland signed the Commercial Lease No. Q13C301³ (Lease) for the Mary River mine in 2013. QIA's comments are herein are focused on items as they relate to the Lease and QIA's role as the Designated Inuit Organization and its duties to administer Inuit Owned Lands.

QIA notified⁴ Baffinland that any work associated with new quarries, changes to the boundaries of existing quarries, and adjustments to the Tote Road would require further information and QIA approval before the work commences, as per the Lease. The addendum as submitted is considered incomplete under the Lease; a full review and therefore QIA Lease approvals cannot be completed without further information. Commencement of a review under the Lease will occur upon receipt of complete work plan addendum materials. QIA has communicated additional information requirements and we understand Baffinland is working to address these outstanding information requests.

Without limitation, the QIA considers the following elements of the 2017 Work Plan Addendum to have a relationship to Baffinland's Water Licence:

- Updated Environmental Management Plans associated with water quality, quantity and flow associated with the Tote Road.
- Reclamation security.

¹ NWB (2017). 170606 2AM-MRY1325 Submission of Baffinland 2017 Work Plan - BIMC - Mary River Project - Qikiqtani Region. June 6, 2017.

² Baffinland (2017) submittal to QIA titled "2017 Work Plan Addendum". May 26, 2017

³ QIA and BIMC (2013) Commercial Lease No.: Q13C301. September 6, 2013.

⁴ QIA (2016) letter to Baffinland titled "Final Review of Baffinland Iron Mines Corporation 2017 Work Plan for the Mary River Project". December 12, 2016



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 Proposed activities completed under the Lease satisfy all other applicable environmental laws and regulations.

As per the Lease, Baffinland cannot commence the proposed activities until these elements have been satisfied. If the NWB would like to complete a formal review of security or any activities proposed under the 2017 Work Plan Addendum QIA will be available to participate in the NWB's processes. QIA specifically requests that in coming to a decision on steps to be taken under the water licence that the NWB is clear in what has guided their decision on process and next steps, including listing any specific details relied upon (i.e. past decisions of the Board, documents file by the proponent, sections of the existing water licence).

QIA always open to further discussions whether specific to this letter, its information requirements, or, Lease obligations with you and your staff at a time that is mutually agreeable. We look forward to hearing back from the Board on next steps pertaining to the 2017 Work Plan Addendum.

Sincerely,

SWB

Stephen Williamson Bathory Director, Department of Major Projects Qikiqtani Inuit Association

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