



Water Resources Division  
Nunavut Regional Office  
Iqaluit, NU X0A 0H0

Your file - Votre référence  
2AM-MRY1325

November 27, 2017

Our file - Notre référence  
CIDM#1186750

Richard Dwyer  
Licensing Administrator  
Nunavut Water Board  
Gjoa Haven, NU X0B 1J0

sent via email: [richard.dwyer@nwb-oen.ca](mailto:richard.dwyer@nwb-oen.ca), [licensing@nwb-oen.ca](mailto:licensing@nwb-oen.ca)

**Re: Revised Schedule for 2018 Annual Security Review of Baffinland Iron Mines Corporation's 2AM-MRY1325 Type A Water Licence**

Dear Mr. Dwyer,

Thank-you for your email notice received on November 22, 2017 inviting comments on the revised schedule for Baffinland Iron Mines Corporation's (Baffinland) Type A Water Licence 2AM-MRY1325 amendment #1 Annual Security Review (ASR). Indigenous and Northern Affairs Canada's (INAC) would like to offer the following timelines which will allow for our participation:

Activity	NWB proposed date	INAC proposed date
Licensee filed outstanding information required to commence the 2017-2018 ASR.	November 22, 2017	—
Stakeholders and interested parties to provide feedback on the proposed, revised schedule for the 2017-2018 ASR Process.	November 27, 2017	—
Public review process period commences for the 2017-2018 ASR Process.	November 28, 2017	—
Interested parties to file written submissions with the NWB written submissions for the 2018 Work Plan in accordance with relevant section(s) of Part C and Schedule C of Licence No. 2AM-MRY1325 – Amendment No.1.	January 6, 2018	February 2, 2018
Licensee to file with the NWB its response(s) to interveners' submissions provided for the 2018 Work Plan.	January 12, 2018	February 9, 2018
NWB to hold an ASR teleconference for interested parties and stakeholders to discuss and potentially address the issues identified during their reviews of the 2018 Work Plan.	January 17, 2018	February 15, 2018

Activity	NWB proposed date	INAC proposed date
Parties to file, if required, revisions and/or addenda to their original written submissions based upon relevant commitments made during the ASR teleconference and/or in accordance with relevant section(s) of Part C and Schedule C of Licence No. 2AM-MRY1325 – Amendment No.1.	January 23, 2018	February 21, 2018
NWB to advise the Licensee and interested parties of the total reclamation security required for 2018 Work Plan under Part C, Item 1 of Licence No. 2AM-MRY1325 – Amendment No.1.	February 2, 2018	March 16, 2018
Licensee to file the total reclamation security amount for 2018 as determined by the ASR Process and set by the NWB for Licence No. 2AM-MRY1325 – Amendment No.1.	March 2, 2018	April 16, 2018

During a phone call between Stephen Williamson Bathory from the Qikiqtani Inuit Association (QIA) and Sean Joseph from the Nunavut Water Board (NWB), Stephen proposed beginning by determining which parts of the work plan would be covered under the present water licence. We can see that this would help bring clarity to the modification requests next year and avoid Baffinland posting security for activities they could not undertake. Though such an exercise is not included in our proposed schedule, we are open to including it at the beginning of the schedule if all the other steps are pushed back.

INAC would like to emphasize that Baffinland cannot undertake any activities in their 2018 Work Plan that increase the site's reclamation costs until they have filed the total security amount determined by the NWB. The initial filing of information was delayed which is unfortunate as we have lost a window of opportunity. We want to make sure that this late filing does not cause the rest of the ASR process to be rushed. INAC is requesting sufficient time for a thorough review of the 2018 Work Plan to ensure adequate security will be held for the Baffinland project.

Please do not hesitate to contact me at 867-975-3876 or [sarah.forte@aandc-aadnc.gc.ca](mailto:sarah.forte@aandc-aadnc.gc.ca) for any additional information.

Regards,

Sarah Forté  
Water Management Specialist

c.c.: Christopher Murray, Environmental & Regulatory Compliance Manager,  
Baffinland  
Stephen Williamson Bathory, Director of Department of Major Projects, QIA  
Sean Joseph, NWB