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NUNAVUT WATER BOARD  
NUNAVUT IMALIRIYIN KATIMAYINGI  
OFFICE DES EAUX DU NUNAVUT

File No: 2AM-MRY1325

October 31, 2022

To: Mary River Distribution List

**Subject: Licence No: 2AM-MRY1325 Type “A”; Mary River Project, Baffinland Iron Mines Corporation, Process Guidance Annual Security Review Associated with 2023 Work Plan**

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Dear Parties:

On October 13, 2022, the Nunavut Water Board (the NWB or Board) received from Baffinland Iron Mines Corporation (Baffinland or the Licensee) the request for extension of the deadline for submission of the 2023 Work Plan (the Request). The submission of the 2023 Work Plan is required to commence the Annual Security Review (the ASR) as required under Licence No: 2AM-MRY1325 (the Licence) issued to Baffinland.

The Licensee stated:

*Baffinland proposes extending this deadline by forty-five (45) days to December 15, 2022... First, due to unique circumstances this year, a November 1 deadline would not allow Baffinland to provide a comprehensive work plan and estimate that accurately reflects activities planned for 2023. In particular, the Minister of Northern Affairs has yet to render his decision on Baffinland's Phase 2 Proposal, which is now expected on November 9, 2022. Baffinland's planned activities for 2023 greatly depend on what is permitted according to the Minister's decision.*

*Second, Baffinland and QIA are in the process of addressing unresolved issues regarding calculation methods for their respective security estimates. Without an extended deadline, it is unlikely Baffinland could integrate any changes resulting from its ongoing dialogue into the 2023 Work Plan and Estimate.*

The NWB provided the Request to the landowners, the Qikiqtani Inuit Association (QIA) and Crown-Indigenous Relations and Northern Affairs (CIRNA) with the deadline for comments set for October 20, 2022. On or before October 20, 2022, both parties provided<sup>1</sup> their feedback supporting the Licensee's Request. In addition, CIRNA proposed the following:

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<sup>1</sup> Qikiqtani Inuit Association, dated October 14, 2022; Crown-Indigenous Relations and Northern Affairs Canada, dated October 2022.

*If agreeable to all parties, [CIRNA] requests the Nunavut Water Board (NWB) to consider exercising Part C, Item 1(c) of the Water License to forgo a security review for 2023 if Baffinland's workplan proposes "negligible changes to the amount of financial security already posted and creates no unsecured environmental risk or liability to the public and stakeholders".*

Copies of all documents received can be accessed through the NWB's Public Registry and FTP site using the following link:

[ftp://ftp.nwb-oen.ca/registry/2%20MINING%20MILLING/2A/2AM%20-%20Mining/2AM-MRY1325%20BIMC/3%20TECH/2%20SECURITY%20\(C\)/2023/](ftp://ftp.nwb-oen.ca/registry/2%20MINING%20MILLING/2A/2AM%20-%20Mining/2AM-MRY1325%20BIMC/3%20TECH/2%20SECURITY%20(C)/2023/)

In accordance with Schedule C of the Licence, the Board satisfies the Licensee's Request and extends the deadline for Baffinland's submission of the 2023 Work Plan and supplemental documentation to **December 15, 2022**. Following the submission, the Board will provide its Process Guidance outlining the timeline for 2023 ASR that takes into consideration the above-mentioned deadline.

In addition, should the Licensee provide rationale to indicate that only negligible changes to the reclamation security are required in accordance with the 2023 Work Plan, the Board will request the Qikiqtani Inuit Association and Crown-Indigenous Relations and Northern Affairs to provide their recommendations on waiving the 2023 ASR as outlined in Licence Part C, Item 1(c).

Should you have any questions regarding the above, please direct them to the NWB Licensing Department by email to [licensing@nwb-oen.ca](mailto:licensing@nwb-oen.ca), or to Assol Kubeisinova, Technical Advisor, by email at [assol.kubeisinova@nwb-oen.ca](mailto:assol.kubeisinova@nwb-oen.ca) or by phone at (867) 360-6338 Ext. 31.

Sincerely,



Assol Kubeisinova  
Technical Advisor  
Nunavut Water Board