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Qikiqtani Inuit Association

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Serving the communities of

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Clyde River

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Pond Inlet

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Qikiqtarjuaq

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Resolute Bay

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Sanirajak

February 28, 2025

Robert Hunter
Licensing Administrator, Nunavut Water Board

RE: Type 'A' Water Licence 2AM-MRY1325 - ICRP Version 6 and WRF Thermal Model

Dear Mr. Hunter,

The Qikiqtani Inuit Association (QIA) wishes to inform the Nunavut Water Board (NWB) that **it does not support the approval** of Baffinland Iron Mines Corporation's (Baffinland) Interim Closure and Reclamation Plan (ICRP) Version 6 and the Waste Rock Facility (WRF) Thermal Model, distributed by the NWB on January 28, 2025, in accordance with Part D, Item 2 of the Type 'A' Water Licence 2AM-MRY-1325 (the Licence).

QIA was recently notified by Baffinland that it will no longer support or fund the Inuit Stewardship Program (ISP) and the Inuit Avatimut Kamattianirmut Katimajiit (IAKK). The ISP and IAKK are central to Inuit engagement and are critical to the implementation of ICRP Version 6, which was developed collaboratively by BIMC and QIA. The ISP and IAKK were intended to play a key role in defining Inuit-informed closure and revegetation objectives, water and air quality criteria at closure, as well as post-closure monitoring and long-term site care.

Given BIMC's decision to deny funding for the ISP/IAKK, it is no longer able to fulfill the commitments outlined in ICRP Version 6 as submitted to the NWB. **In this context, QIA does not support ICRP Version 6. Without these key components in place, namely the ISP and IAKK, QIA does not have confidence that the goals on community engagement can be achieved.**

Sincerely,

Jared Ottenhof
Director, Lands and Resource Management