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Qikiqtani Inuit Association

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August 8, 2025

Karén Kharatyan – Director, Technical Services  
Robert Hunter – Licensing Administrator  
Nunavut Water Board  
P.O. Box 119  
Gjoa Haven, Nunavut  
X0B 1J0

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

Dear Mr. Kharatyan and Mr. Hunter,

On July 11, 2025, Baffinland submitted responses to review comments on Revision 6 of the Interim Closure and Reclamation Plan (ICRP) and the Waste Rock Facility (WRF) Thermal Model for the Mary River Project. These comments were submitted by the Qikiqtani Inuit Association (QIA), Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC), and Environment and Climate Change Canada (ECCC).

After a careful review of Baffinland's responses, as well as the revised ICRP documents and appendices, QIA is satisfied with the responses provided at this time. QIA is confident that any outstanding issues will be addressed either during the implementation of Version 6 or in the development of Version 7 of the ICRP.

Specifically, in relation to QIA comments #1 to #4 in Baffinland's July 11 responses (pages 12–13):

- **Comment #1 – Appendix D5 on Revegetation:** Baffinland has positively responded to QIA's comment, committing to engage with QIA in the development and design of the Terms of Reference (ToR) for the Project Reclamation Feasibility Analysis (PRFA), including an assessment of active revegetation measures, and to consider feedback from Inuit and IQ holders during the review of the PRFA.
- **Comments #2 and #3 – Section 9, Appendices D5 & D7 on Environmental and Wildlife Monitoring:** Baffinland has revised Table 9.1 to reflect its commitment to conduct annual monitoring in years 0 to 7 and year 15 post-closure. Baffinland has also committed to engage with Inuit and IQ holders in conducting further studies and analyses—including the PRFA—to refine future versions of the ICRP and associated closure objectives, extend monitoring activities where



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warranted, and review the current proposed wildlife monitoring program and methodologies to provide a clear rationale for the spatial and temporal scope of the program.

- **Comment #4 – Appendix D4 on the WRF Thermal Model:** Baffinland has agreed to use multiple climate change scenarios to provide a more robust assessment of environmental risks, including risks associated with the active thermal zone in the WRF and the potential need for a thicker thermal cover.

QIA reiterates its recommendation that Version 6 of the ICRP be approved at this time.

Sincerely,

Conor Goddard

Manager of Project Compliance and Monitoring  
Qikiqtani Inuit Association  
(P) 867.975.8385 or toll-free 1.800.667.2742  
[cgoddard@qia.ca](mailto:cgoddard@qia.ca)