



Water Resources Division  
Resource Management Directorate  
Nunavut Regional Office  
918 Nunavut Drive  
Iqaluit, NU, X0A 3H0

Your file - Votre référence  
2AM-MRY2540  
Our file - Notre référence  
GCDocs#141552892

November 14, 2025

Robert Hunter  
Licensing Administrator  
Nunavut Water Board  
P.O. Box 119  
Gjoa Haven, NU, X0B 1J0  
E-mail: [licensing@nwb-oen.ca](mailto:licensing@nwb-oen.ca)

**Re: Crown-Indigenous Relations and Northern Affairs Canada's Review of the Process Timeline for Baffinland's Annual Security Review, Type A Water Licence No. 2AM-MRY2540**

Dear Mr. Hunter,

Thank you for the November 7, 2025 invitation to review the process guidance of Baffinland's Annual Security Review Associated with the 2026 Work Plan timelines.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the timelines in Table 1 and upon review have concerns with the current proposed dates for the following reasons;

- Baffinland has prepared their entire annual security estimate using a new CAPEX model. While a small portion of this model was introduced during the 2024 ASR, the majority of the 2024 estimate continued to utilize the previous Estimate Breakdown Structure and pre-established rates (e.g., 2020 arbitration rates),
- Baffinland has also updated their draft Disturbed Area Analysis procedure.

Additional time may be required to populate a RECLAIM model estimate comparison and to assess Baffinland's request for a reduction in security. As such, CIRNAC cannot commit to the proposed timeline before it's initial review of the new model.

CIRNAC understands that the Board wishes to proceed as soon as possible and we suspect we can provide clarity on timelines by the end of November.

If there are any questions or concerns, please contact [lauren.perrin@rcaanc-cirnac.gc.ca](mailto:lauren.perrin@rcaanc-cirnac.gc.ca) or Andrew Keim at [andrew.keim@rcaanc-cirnac.gc.ca](mailto:andrew.keim@rcaanc-cirnac.gc.ca).

Sincerely,



A handwritten signature in black ink, appearing to read 'Lauren Perrin'.

Lauren Perrin  
Water Management Specialist