



Water Resources Division  
Resource Management Directorate  
Nunavut Regional Office  
P.O. Box 100  
Iqaluit, NU, X0A 0H0

2AM-MRY2540  
*Our reference – Notre référence*  
GCDOC#

April 9, 2026

Robert Hunter  
Licensing Administrator  
Nunavut Water Board  
PO Box 119  
Gjoa Haven Nu. X0B 1J0

*Sent via email : [robert.hunter@nwb-oen.ca](mailto:robert.hunter@nwb-oen.ca)*

**Re: CIRNAC response to Baffinland Iron Mines (BIM) request to conduct activities from the 2026 Workplan outside of the approved Annual Security Review process.**

Dear Mr. Hunter,

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) acknowledges receipt of your request for comments sent on March 25 2026 and we apologize for not having a response prepared for the deadline of April 2 2026 as requested by the Board.

After careful consideration of this request and in noting the response from the Qikiqtani Inuit Association we provide the Board the following comments in relation to BIM's request.

CIRNAC would like to thank the NWB for its ongoing coordination of Baffinland's annual security review process. CIRNAC remains confident in the estimate it provided to the Board on January of 2026. The QIA has made the decision to approve Baffinland in proceeding with 7 of the work items outlined in its 2026 workplan for activities occurring in and on Inuit Owned Lands. CIRNAC supports the QIA voluntarily taking on the added risk and liability themselves.

In addition, CIRNAC fully supports the QIA in exercising its discretionary authority over Inuit Owned Lands. CIRNAC, however, remains concerned that there will be additional unfunded risk associated with undertaking activities not approved under the current posted security without any new security being included under the completed ASR process.



Please don't hesitate to contact me by email at [Andrew.Keim@Canada.ca](mailto:Andrew.Keim@Canada.ca) or telephone at 867-975-4550 for further information.

Sincerely,

A handwritten signature in blue ink, consisting of a stylized, cursive 'A' followed by a long horizontal stroke that extends to the right.

A. Keim  
Manager of Waters