ᖃᐳᖅᑕᓂ ᐃᓄᐃᑦ ᑲᔪᓯᖏᑎᒋᔭᖅ
Qikiqtani Inuit Association

ᐱᓕᕆᕋᖅᑐᑦ ᓄᓇᕗᒻᒥᑦ ᐅᑯᓂᒃᑖ
Serving the communities of
ᐃᑲᐱᐊᓪᓚᖅ Arctic Bay
ᑲᖏᕐᕋᑐᒍᒪᒃ Clyde River
ᐊᐅᓚᐃᑦᑐᕐᓂᖅ Grise Fiord
ᐃᓚᒋᓕᒃ Igloolik
ᐃᖃᓗᐃᑦ Iqaluit
ᑭᒥᑭᔪᖅ Kimmirut
ᑭᙵᓚᐃᑦ Kinngait
ᐸᓐᖏᕐᑐᒍᖅ Pangnirtung
ᑎᑎᒪᒋᕓᒃ Pond Inlet
ᖃᐅᑭᑐᕋᐊᓂᖅ Qikiqtarjuaq
ᕆᐅᓕᑦᑎᐊᓂᖅ Resolute Bay
ᓴᓂᑭᓗᐊᓂᖅ Sanikiluaq
ᓴᓂᕆᔨᒃ Sanirajak

July 24, 2026

Robert Hunter
Licensing Administrator
Nunavut Water Board
PO Box 119
Gjoa Haven, NU, X0B 1J0

RE: 2AM-MRY2540 Baffinland Request to Update Water Withdrawal Volumes for Dust Control

Dear Mr. Hunter,

The Qikiqtani Inuit Association (QIA) has completed a review of Baffinland Iron Mines Corporations' request to update water withdrawal volumes for dust control and has appended several comments for your consideration. Please contact Conor Goddard, Manager, Project Compliance & Monitoring (CGoddard@qia.ca) if you require additional information.

Nakurmiik,

Chris Spencer
Asst. Director, Department of Lands & Resource Management
Qikiqtani Inuit Association

QIA Technical Review Comments

Baffinland's Request to Update Water Withdrawal Volumes for Dust Controls

Comment Number	**QIA-1**
Issue	Clarification of equipment used
Reference	Notification for Update to Water Withdrawal Volumes for Dust Control – Type 'A' Water Licence 2AM-MRY2540, Page 1
Discussion	Baffinland requests that the authorized withdrawal limits for dust suppression be administered as an average of 1,500 m3/day, rather than fixed maximum volumes applicable to each individual withdrawal location per day. The proposed request is intended to provide additional operational flexibility for dust suppression activities by allowing increased withdrawal volumes on certain days while maintaining the overall average daily limit throughout the year. Importantly, the proposed request does not alter the following: • The maximum annual withdrawal limit of 547,000 m^3 • The purpose of the water use (for dust control) • The overall volume of water authorized for dust suppression under the Water Licence.
Recommendation	Baffinland has indicated the withdrawal limits for dust suppression should be an average value versus the current maximum value. Can Baffinland please confirm if the size or quantity of equipment will be altered at each pumping location to support potential increased pumping. Secondly, will the rate of water withdrawal change to support a potentially higher daily withdrawal volume?

Comment Number	**QIA-2**
Issue	Avoidance of adverse effects without short-term withdrawal limits.
Reference	Notification for Update to Water Withdrawal Volumes for Dust Control – Type 'A' Water Licence 2AM-MRY2540, Page 1 Attachment 1 - Knight Piésold Ltd. (KP), Updated Review of 2022 Dust Suppression Water Withdrawals, Mary River Project, Page 4.
Discussion	The notification letter states "that the authorized withdrawal limits for dust suppression be administered as an average of 1,500 m3/day, rather than fixed maximum volumes applicable to each individual withdrawal location per day. The proposed request is intended to provide additional operational flexibility for dust suppression activities by allowing increased withdrawal volumes on certain days while maintaining the overall average daily limit throughout the year" Attachment 1 is used as evidence that streamflow and fish habitat will not be adversely affected by increased daily withdrawal rates. The notification states, "The assessment concluded that the authorized sources could support the instantaneous withdrawal rates without adversely affecting streamflow and fish habitat." Additionally, Attachment 1 states that Type 'A' Water Licence limits were based on water requirements and not environmental thresholds. The report concludes "While daily limits specified in the Type A Water Licence occurred at five water stations over the 2022 open water period, these exceedances were not environmentally consequential [...] We advise Baffinland to request increases to the daily water withdrawal volumes at the stations that are used or request that monthly limits on water use be used to reflect the sporadic nature of water withdrawals."

	It is understood that the existing maximum daily water withdrawal limits were not established based on thresholds of potential effects. However, as no upper daily threshold has been set, it is unclear what withdrawal rates Baffinland is referring to when concluding that the proposed amendment will not adversely affect streamflow. While understood to be unlikely, under this model, there is nothing preventing the annual limit from being withdrawn during a short period of time. The KP Report recommends increasing the existing daily withdrawal limits or establishing monthly limits but does not recommend replacing these with average daily limits based on annual thresholds. Consequently, it remains unclear what withdrawal thresholds are considered protective for each source and how adverse effects on streamflow will be prevented if withdrawals are limited only by an annual volume.
Recommendation	The threshold at which water withdrawals would result in adverse effects should be identified and discussed for each source. A maximum withdrawal threshold should be established for each source to protect streamflow and fish habitat under the proposed amendment. This threshold should represent an upper limit that cannot be exceeded, even if average daily withdrawals remain within the proposed annual allocation. This will prevent short-term impacts to aquatic resources that may occur if relying on annual averaging alone.

Comment Number	**QIA-3**
Issue	Winter withdrawals from ice-covered waterbodies.
Reference	Notification for Update to Water Withdrawal Volumes for Dust Control – Type 'A' Water Licence 2AM-MRY2540 Attachment 1 - Knight Piésold Ltd. (KP), Updated Review of 2022 Dust Suppression Water Withdrawals, Mary River Project
Discussion	The notification and attachment 1 do not discuss water withdrawals from ice-covered water bodies. For winter withdrawals, compliance with the DFO (2010) *Protocol for Winter Water Withdrawal from Ice-covered Waterbodies in the Northwest Territories and Nunavut* requires characterization of ice thickness, total water depth at the intake location, and calculation of available under-ice water volume to ensure that withdrawals do not exceed recommended limits (e.g., <10% of available under-ice volume), and do not remove oxygenated surface waters that are critical to over-wintering fish. It is unclear how these parameters will be measured, calculated, or validated at the proposed intake locations under a withdrawal regime that does not include maximum daily limits and instead relies on average daily withdrawals calculated from annual limits.
Recommendation	Please clarify if winter withdrawals will occur along the Tote Road. If so, please indicate how compliance with DFO recommendations for winter water withdrawals will be implemented under the average daily limit approach.