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Sanirajak

July 1, 2020

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RE: Response to Baffinland's Quarry D1Q2 Closure Memo

Dear parties,

The Qikiqtani Inuit Association (QIA) has prepared this letter in response to Baffinland Iron Mines Corporation's (BIMC) Quarry D1Q2 Closure Memo¹ as well as the Nunavut Water Board's (NWB) follow-up request for comment². QIA has reviewed BIMC's memo, including associated materials, and provides the following comments to both parties:

1. Contravention of IIBA Section 15.10.4

BIMC submitted the D1Q2 memo¹ to QIA and the NWB at the same time, in contravention of Inuit Impact and Benefit Agreement³ (IIBA) Section 15.10.4. This section requires that submissions related to regulatory instruments are to be provided to QIA 30 days prior to regulatory bodies. This requirement allows QIA to provide feedback on draft submissions to promote the alignment of objectives between QIA and BIMC. It is QIA's expectation that BIMC will abide by this condition in the future.

2. Addressing Quarry D1Q2 physicochemical instability

The Knight Piesold memo⁴ highlights concern related to the slope stability of sections of Quarry D1Q2. The report also identifies a Water Licence⁵ discharge limit exceedance of Total Lead (Part E. Condition 24 of the Water Licence). These physicochemical concerns must be addressed as soon as reasonably possible to ensure site safety and to avoid additional exceedances of Water Licence discharge limits.

¹ Baffinland (2020). RE: Quarry D1Q2 Closure Memo. June 4, 2020.

² Nunavut Water Board (2020). 200610 – 2AM-MRY1325 – Submission of Quarry D1Q2 Closure Memo – Mary River Project – Qikiqtani Region [Email]. June 10, 2020.

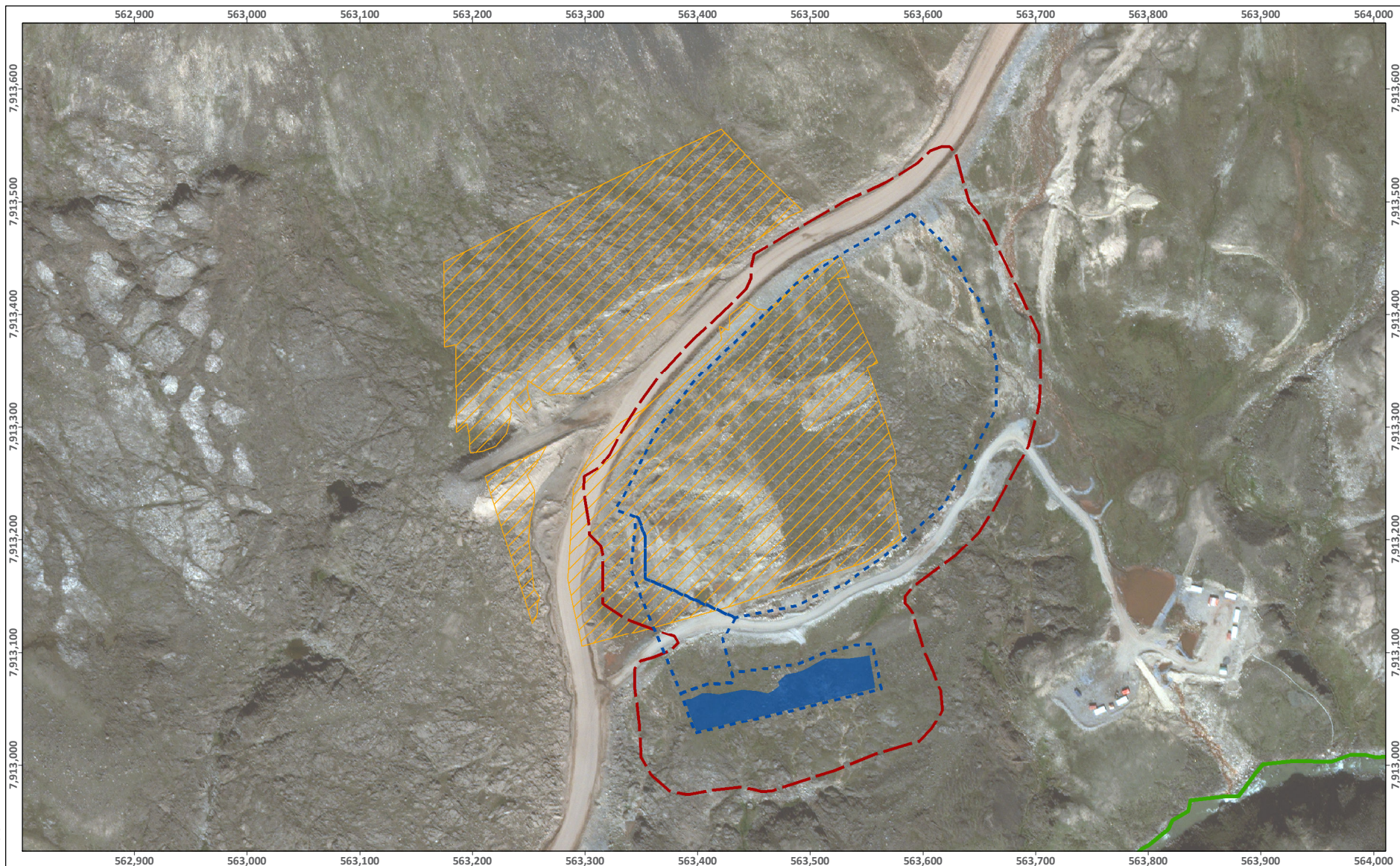
³ QIA and Baffinland (2018). The Mary River Project Inuit Impact and Benefit Agreement. October 22, 2018.

⁴ Knight Piesold (2020). Deposit 1 Quarry (D1Q2) Inspection and Review Summary for Closure. March 30, 2020.

⁵ Nunavut Water Board (2015). Licence No. 2AM-MRY1325 – Amendment No. 1. July 31, 2015.



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LEGEND

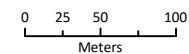
- KM 106 Stockpile Potential Disturbance Area (Approximate)
- KM 106 Stockpile Estimated Catchment Area Boundary
- Sedimentation Pond
- Quarry D1Q2

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MARY RIVER PROJECT

Mine Site KM 106 Stockpile

Projection: NAD 1983 UTM ZONE 17N.
Base Map: © 2019 Digital Globe, Inc.
Imagery and Infrastructure are representative
as of August 2019.



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FIGURE

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