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July 6, 2020

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**RE: 200618 2AM-MRY1325 - Submission of Construction Notification and IFC
Submission - Mine Site Landfarm**

Dear parties,

The Qikiqtani Inuit Association (QIA) provides this response to the Nunavut Water Board's (NWB) request¹ for comments regarding Baffinland Iron Mines Corporation's (BIMC) Mine Site Landfarm Issued for Construction (IFC) June 18, 2020 submission, as required by Part D, Item 2 of the Type 'A' Water Licence 2AM-MRY-1325. Several comments are provided for the consideration of NWB and BIMC:

1. Contravention of IIBA Section 15.10.4

BIMC submitted the Mine Site Landfarm IFC package to NWB and QIA on June 18, 2020, in contravention of Inuit Impact and Benefit Agreement² (IIBA) Section 15.10.4 which requires that regulatory submissions are to be provided to QIA 30 days in advance. This requirement allows QIA to provide feedback on draft submissions to promote the alignment of objectives between QIA and BIMC.

2. Security Estimate for the Mine Site Landfarm

BIMC, in their covering letter, indicated the 2020 security estimate assigned 9,000 m² to the facility footprint and highlights the design's effective footprint is only 8,813 m². However, Section 4.0 Closure and Reclamation indicates the lined area is 16,276 m² and the unlined area is 4,900 m². The access road area is not discussed in this submission. QIA requests a confirmation of the final footprint for the lined area, unlined area, access roads and any additional infrastructure related to the facility.

3. Determination of Cell Storage Capacity

QIA interprets item no. 3.6 of Table 1 to indicate that the storage capacity was derived from the 2016 and 2017 Annual Reports. It is unclear to QIA why the 2018 and 2019 Annual

¹ NWB (2019). Email titled: 2AM-MRY1325 Baffinland Iron Mines Revised Run of Mine Stockpile and Sedimentation Pond Issued For Construction Drawings. Sent by Richard Dwyer on June 26, 2019.

² QIA and Baffinland (2018). The Mary River Project Inuit Impact and Benefit Agreement. October 22, 2018.



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Reports were not referenced. Is the proposed storage capacity sufficient for current and future anticipated use?

4. Geological and Hydrogeological Considerations

How has bedrock geology, surficial geology, permafrost conditions and groundwater flow dynamics (if significant) been factored into the proposed design?

5. Analogous Lined Facilities

How has BIMC incorporated lessons learned from current line facilities, including any incidents or failures (e.g., seepages at the Waste Rock Facility), in this design?

6. Construction and Post-Construction Monitoring

Does BIMC intend to install monitoring equipment to support construction and post construction monitoring?

7. Commercial Lease Operations Guide

QIA is seeking confirmation that BIMC will follow the Lease Operations Manual for As-Built Reports when delivering the Construction Summary Report.

Sincerely,

Chris Spencer
Manager, Regulatory Affairs