



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#142342361

December 18th, 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  
Notice of Construction for Access Road to a Future Mine Site Laydown Area for  
the Mary River Project, Type A Water Licence No. 2AM-MRY2540**

Dear Robert Hunter,

Thank you for the December 5, 2025 invitation to review the Notification of Construction of an Access Road to a Future Mine Site Laydown Area submitted by Baffinland Iron Mines Corporation (Baffinland), for Type A Water Licence No. 2AM-MRY2540.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the application pursuant to its mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Crown-Indigenous Relations and Northern Affairs Act*. Please find CIRNAC comments and recommendations in the attached Technical Memorandum.

The applicant shall provide confirmation from the Nunavut Water Board that all outstanding water license fees have been paid in full prior to approval of this application.

If there are any questions or concerns, please contact Lauren Perrin at (897) 975-3877 or [lauren.perrin@rcaanc-cirnac.gc.ca](mailto:lauren.perrin@rcaanc-cirnac.gc.ca) Or Andrew Keim at (867) 975-4550 or [Andrew.keim@rcaanc-cirnac.gc.ca](mailto:Andrew.keim@rcaanc-cirnac.gc.ca)

Sincerely,

William Quere, BSc  
Municipal Coordinator



## **Technical Review Memorandum**

**Date:** 18 December 2025

**To:** Robert Hunter – Licensing Administrator, Nunavut Water Board

**From:** William Quere – Municipal Coordinator, CIRNAC

**Subject: Crown-Indigenous Relations and Northern Affairs Canada's Review of the Notice of Construction for Access Road to a Future Mine Site Laydown Area for the Mary River Project, Type A Water Licence No. 2AM-MRY2540**

**Region:** ☐ Kitikmeot ☐ Kivalliq ☒ Qikiqtani

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### **A. BACKGROUND**

The Mary River Project is an operating high-grade iron mine located in the Qikiqtani Region of Nunavut, on northern Baffin Island. The mine is owned and operated by Baffinland Iron Mines Corporation (Baffinland) and includes the Mine Site, the Milne Port site, and a 100 km-long Tote Road connecting the two sites. The current approved project allows iron ore production through open pit mining.

The Project has gone through a number of important milestones prior to operating at the 2024 approved production rate of 6 Million Tonnes Per Annum (Mtpa). Baffinland's initial proposal consisted of mining iron ore from the reserve at Deposit No. 1 at a production rate of 18 Mtpa (with operational flexibility) and using a port south of the mine in Steensby Inlet, serviced by an approximately 149 Km Steensby Railway to transport the ore to market. Baffinland submitted a notification of Construction as is required by 2AM-MRY2540 Part D Item 1.

CIRNAC provides the following comments and recommendations pertaining to the application package. A summary of the subjects of recommendations can be found in Table 1. Documents reviewed as part of this submission can be found in Table 2 of Section B. Detailed technical review comments can be found in Section C.



**Table 1: Summary of Recommendations**

Recommendation Number	Subject
R-01	Water management of contaminant runoff, drainage, and erosion
R-02	Road location

## **B. DOCUMENTS REVIEWED AND REFERENCED**

The following table (Table 2) provides a list of the documents reviewed under the submission and reference during the review.

**Table 2: Documents Reviewed and Referenced**

Document Title	Author, File No., Rev., Date
WATER LICENCE NO: 2AM-MRY2540	Nunavut Water Board, 2025
251205 2AM-MRY2540 Type A Notification Access Road Final-ILAE	Elisabeth Luther, December 5, 2025
2026 Work Plan, Rev. 0	Baffinland 2025



## **C. RESULTS OF REVIEW**

### **1. Water management of contaminant runoff, drainage, and erosion**

#### **Comment:**

The proposed development area is predominantly in the NAG Stockpile area. The concern is that there is no mention on how the contaminant runoff, altered drainage patterns, or erosion will be managed.

#### **Recommendation:**

(R-01) CIRNAC recommends that the applicant provide a plan for how the contaminant runoff, altered drainage patterns, and erosion control will be addressed during construction.

### **2. Road Location**

#### **Comment:**

The figures provided in the application do not show where the proposed road is located. The concern is that without proper information, it is difficult for CIRNAC to comment on the application.

#### **Recommendation:**

(R-02) CIRNAC recommends that the applicant provide figures with the proposed road location.