



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

January 2nd , 2026

Robert Hunter
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
E-mail: licensing@nwb-oen.ca

Re: Crown-Indigenous Relations and Northern Affairs Canada's (CIRNAC) Review of Baffinland Iron Mines Corporation's (Baffinland) response to the Notice for Construction of an Access Road for the Mary River Project, Type A Water Licence No. 2AM-MRY2540

Dear Robert Hunter,

Thank you for the 29 December 2025 invitation to review Baffinland's response to the comments CIRNAC made on the Notice of Construction submitted by Baffinland for the Type A Water Licence No. 2AM-MRY2540.

CIRNAC examined the response 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*. CIRNAC is unsatisfied with Baffinland's response and has the following comments.

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

Baffinland has identified the plans that are in place if runoff, drainage, or erosion occur and are caught by existing "approved project plans and commitments". The concern is Baffinland has made no mention of explicit measures to be put into place to prevent these from occurring or preventing sedimentation or erosion from reaching any water body.

CIRNAC recommends that Baffinland provide which tasks specifically will be performed for this site to manage runoff, drainage, and erosion. CIRNAC would also ask the applicant to clarify if there is a specific monitoring plan in place if runoff from the stockpile is identified for example during spring or a major rain event.



2. Road Location.

Baffinland has identified “NAG Stockpile Replacement 500kt”, and ‘Development Area – January-March 2026” from figure one and two as the proposed access road. The concern is that this a broad area which, while it is acknowledged that this road will undergo changes in the future, it is difficult to properly assess this initial construction without proper information.

CIRNAC recommends the applicant provide figures with the proposed road location explicitly defined in the development area for this construction.

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

Sincerely,

William Quere, BSc
Municipal Coordinator