Crown-Indigenous Relations and Northern Affairs Canada
Relations Couronne-Autochtones et Affaires du Nord Canada

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#147673649

October 30, 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 Review of the Notice of Construction - Power Generation Pad Expansion Application for Baffinland Mary River Project, Type A Water Licence No. 2AM-MRY2540

Dear Robert Hunter,

Thank you for the October 7, 2026 invitation to review the referenced licence Notice of Construction - Power Generation Pad Expansion, submitted by Baffinland Iron Mines Corporation, 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 Simran Sandhu at (343) 777-5238 or simran.sandhu@rcaanc-cirnac.gc.ca or Andrew Keim at (867) 975-4550 or andrew.keim@rcaanc-cirnac.gc.ca.

Sincerely,

Sandhu, Simran
Digitally signed by Sandhu, Simran
Date: 2026.10.30 13:04:46 -04'00'

Simran Sandhu,
Water Management Specialist

Canada

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Technical Review Memorandum

Date: October 30, 2026

To: Robert Hunter – Licensing Administrator, Nunavut Water Board

From: Simran Sandhu – Water Management Specialist, CIRNAC

Subject: **Crown-Indigenous Relations and Northern Affairs Canada's Review of the Notice of Construction - Power Generation Pad Expansion Application for Baffinland Mary River Project, Type A Water Licence No. 2AM-MRY2540**

Region: ☐ Kitikmeot ☐ Kivalliq ☒ Qikiqtani

A. BACKGROUND

Baffinland Iron Mines Corporation (Baffinland) operates the Mary River Project in the Qikiqtani Region of Nunavut under Type A Water Licence No. 2AM-MRY2540.

Baffinland proposes to expand the existing Power Generation Pad to accommodate a perimeter road and improve traffic management. The work is included in the 2026 Work Plan under Item No. 2026-5, associated with area MS-LAY-002 in the Basis of Estimate. Security was posted on October 1, 2026.

The proposed work includes subgrade preparation, rockfill placement, grading, safety berms, and a 10 m wide access road to the light plants. Phase 2 is located within the high-water mark of an ephemeral watercourse identified as non-fish-bearing. Construction is scheduled to begin on December 7, 2026, and is expected to take 14 weeks. Baffinland proposes to manage potential erosion, sedimentation, and drainage impacts through construction controls, inspections, and monitoring under the existing Surface Water and Aquatic Ecosystem Management Plan (SWAEMP).

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	Rockfill Source

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
261007 2AM-MRY2540 Notice of Construction - Power Gen Pad-ILAE.pdf	Baffinland, October 07, 2026
261007 2AM-MRY2540 Notice of Construction - Power Gen Pad Email Dist-OLAE.pdf	NWB, October 07, 2026
250428 2AM-MRY2540 Water Licence OAJE.pdf	NWB, 2025

C. RESULTS OF REVIEW

1. Rockfill Source

Comment:
The Notice of Construction identifies the quantities of rockfill required for each construction phase but does not clearly identify the source or type of material to be used. CIRNAC is concerned about the potential for metal leaching or acid rock drainage from the material and the resulting impacts on surface water quality.

Recommendation:
(R-01) CIRNAC recommends that Baffinland identify the type of material proposed for use as rockfill and has a low potential for metal leaching and acid rock drainage.