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September 20, 2018

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Assol Kubeisinova  
Technical Advisor, Nunavut Water Board  
P.O. Box 119  
Gjoa Haven, Nunavut,  
X0B 1J0

**Re: Mary River Project – Upgrades at Mary River Mine Site, Modification Request No. 10.  
Water Licence 2AM-MRY1325**

Dear Assol Kubeisinova:

This letter presents the Qikiqtani Inuit Association’s (QIA) response to the Nunavut Water Board’s (NWB) request<sup>1</sup> for interested parties to provide comments regarding Baffinland Iron Mines Corporation’s (Baffinland) Modification Request No.10, Upgrades at the Mary River Mine Site, submitted by Baffinland on September 5, 2018.<sup>2</sup> The NWB requested that comments be submitted by September 20, 2018, 5:00 p.m., Mountain Standard Time.

As the Designated Inuit Organization for the Qikiqtani region, QIA and Baffinland signed the Commercial Lease No. Q13C301<sup>3</sup> (the Lease) for the Mary River mine in 2013. QIA’s requests as presented in **Table 1** herein are focused on items as they relate to the Lease.

Without limitation, QIA considers the following elements of the modification request to have a relationship to the Lease and/or associated Water Compensation Agreement:

- Adequate reclamation security;
- Whether the proposed activities satisfy all other applicable environmental laws and regulations as well as the Lease;
- Updated Environmental Management Plans associated with water quality, quantity; and flow
- For-construction and as-built documentation.

Included in the modification request submitted by Baffinland are the following:

1. A **self-assessment** of the proposed changes versus the scope of the Approved Project, as described in the Final Environmental Impact Statement (FEIS) and the FEIS Addendum; and
2. The **modification request** as per the submission requirements of the Water Licence.

<sup>1</sup> NWB (2018). Email titled: 180912 2AM-MRY1325 Distribution Review and Comment Request Modification No.10-OLAE. Sent by Ida Porter on September 12, 2018.

<sup>2</sup> Baffinland (2018). RE: Modification No. 10 Upgrades at the Mary River Mine Site Mary River Project, Water Licence 2AM-MRY1325-Amendment No.1. September 5, 2018.

<sup>3</sup> QIA and BIMC (2013) Commercial Lease No.: Q13C301. September 6, 2013.



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In an email to the NWB on September 12, 2018<sup>4</sup>, the Nunavut Impact Review Board (NIRB) states that the proposed activities; remain within the overall larger Project Development Area assessed by the NIRB and reflected in the FEIS for the Mary River Project. Consequently, the changes proposed by Baffinland would not constitute a change in scope of the project or a modification to the NIRB's Project Certificate. QIA agrees with the NIRB's determination that a reconsideration of the Project Certificate for this proposed modification is not necessary.

Notwithstanding the above, QIA is available to discuss this letter and the Lease obligations with the NWB at a time that is mutually agreeable.

Sincerely,

Fai Ndofor  
Regulatory Manager

<sup>4</sup> NIRB (2018). Email titled: 2AM-MRY1325 Modification 10. Sent by Solomon Amuno to Assol Kubeisnova on September 12, 2018



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## Qikiqtani Inuit Association

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**Table 1: QIA requests to NWB concerning Baffinland's Modification No. 10**

ID	QIA Request
1	Baffinland to provide detailed for construction drawings of the four culvert crossings required along the footprint of the new treated effluent pipeline and have QIA approved security for the culverts in place prior to construction.
2	Baffinland to follow the As Built Operations Guide, further detailing expectations of Article 6.4 Item c) of the Lease when preparing the As Built Report/Construction Summary Reports for the expanded Mine Site Landfill and new Effluent Discharge Line. The As Built Report for the landfill expansion should summarize all considerations in Sections 3 and 4 of the Design Brief prepared by Knight Piésold Ltd. This does not limit Baffinland's requirements to Part D, Item 17 of the Water Licence.
3	Baffinland to provide details of the periodic environmental inspections their Environmental Personnel will be carrying out during construction and associated inspection forms for review prior to construction. Results of all environmental inspections should be included in the as-built construction report.
4	Baffinland to provide the exact source of construction, operational and closure cover materials for the landfill expansion.
5	Baffinland to provide details of sedimentation and erosion mitigation measures prior to the landfill expansion.