July 16, 2021

VACUELPOC Dacoc Ddovb

Serving the communities of

DPV 224P Arctic Bay

bapsoline Clyde River

45C2V2AD Grise Fiord

 $\Delta$  $^{\text{L}}$ Igloolik

 $\Delta^{\varsigma}b \Delta^{\varsigma}$ Igaluit

PLTDC Kimmirut

POLLAC Kinngait

<°056)56 Pangnirtung

LcUTCC-P Pond Inlet

SPPSPCS495P Qikiqtarjuaq

45CJV709p Resolute Bay

50P2956 Sanikiluad

50-556 Sanirajak

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

Re: Modification No. 13 - Mine Site Water Management Plan; Mary River Project, Water Licence 2AM-MRY1325

Ms. Kubeisinova,

The Qikiqtani Inuit Association (QIA) has reviewed Baffinland Iron Mines Corporation's (Baffinland) Modification No. 13 - Mine Site Water Management Plan for the Mary River Project (Project) pursuant to the requirements of Water Licence 2AM-MRY1325 and provides the following comments for Baffinland and the Nunavut Water Board's (NWB) consideration.

- 1. Given the scope of the proposed changes, QIA is concerned with the level of detail provided prior to the proposed commencement of construction activities. Construction activities are proposed to occur prior to the finalization of designs for all water management infrastructure. Further, Baffinland has not committed to prompt information sharing during the construction phase. If the Nunavut Water Board (NWB) is considering the application as is, QIA would strongly recommend implementing the following reporting requirements (see below). These requirements will ensure QIA and other intervenors are able to review progress and provide advice on a timely basis.
  - a. Milestone reporting:
    - i. Baffinland classifies the KM105 Sedimentation Pond dams as "significant" consequence structures. A proper dam breach analyses is needed to verify this classification prior to the initiation of construction.
    - ii. Foundation approval documented by the supervising Engineer prior to fill placement.
    - iii. Prompt submission of Design briefs with Issued for Construction (IFC) as well as As-Built documentation
    - iv. Update with results of verification sampling for total suspended solids (TSS).
    - v. Update when sedimentation and erosion mitigation measures are implemented.
  - b. Weekly reporting during construction of the Sedimentation Pond, including but not limited to:
    - i. Use of fill material.













VACUERPOC Dacoc Ddovb

Serving the communities of

DPV 224P Arctic Bay

bapsoline Clyde River

45C2V2AD Grise Fiord

 $\Delta$  $^{\text{L}}$ Igloolik

 $\Delta^{\varsigma}b \Delta^{\varsigma}$ Igaluit

PLTDC Kimmirut

POLLAC Kinngait

<°056)56 Pangnirtung

LcUTCC-P Pond Inlet

SPPSPCS495P Qikiqtarjuaq

45CJV709p Resolute Bay

50P2956 Sanikiluad

50-556 Sanirajak

- ii. Condition of safety berms along the pond embankment.
- iii. Lined embankments and abutments and lined / covered natural slopes.
- iv. Spillway performance.
- v. Water removal system.
- c. Reporting at end of construction season:
  - i. Photos taken before, during and after for new infrastructure.
  - ii. Updates on the geosynthetics Quality Control program.
  - iii. Updates on conducting the Quality Control testing and inspections required on all placed and compacted fill materials.
  - iv. Updates on new monitoring stations added to relevant management / monitoring plans, including the Fresh Water Supply, Sewage and Wastewater Management Plan, and the Surface Water and Aquatic Ecosystems Management Plan.
  - v. Submission of environmental inspection forms by Baffinland and/or contractors.
  - vi. Inspections of earthworks and geological and hydrological regimes
- 2. Baffinland notes that TSS monitoring will only being performed downstream. QIA recommends that upstream monitoring be completed wherever feasible.
- 3. QIA is concerned that the active mine area and the waste rock facility are excluded from the Mine Site Water Management Plan. QIA requests Baffinland provide justification for the exclusion of these project components.
- 4. In Table 1 of the NWB submission (Table 1 Proposed Water Management Facilities), Baffinland states that the design of the KM105 Pond does not meet the proposed design criteria. Additional infrastructure that has not yet been designed is required.
  - a. Why was this issue not rectified during the design phase of the KM105
  - b. Why proceed with construction of the KM105 Pond if the current design does not meet the design criteria?

Sincerely,

Chris Spencer

Manager, Regulatory Affairs