



# ᑭᑭᑭᑭᑭᑭ ᐃᓄᐃᑦ ᑲᑎᑎᑦᑲᑎᑦᑲᑦ Qikiqtani Inuit Association

July 31, 2017

ᐱᐱᑦᑎᑦᑲᑦ  
ᑎᑎᑎᑎᑎᑎᑎᑎ ᑲᑎᑎᑎᑎᑎᑎ  
Serving the  
communities of

ᐃᑦᐱᑦᑲᑦ  
Arctic Bay

ᑭᑭᑭᑭᑭᑭ  
Cape Dorset

ᑲᑦᑎᑦᑲᑎᑎᑎ  
Clyde River

ᑭᑭᑭᑭᑭᑭ  
Grise Fiord

ᑭᑭᑭᑭᑭᑭ  
Hall Beach

ᐃᑦᑲᑎᑎᑎ  
Igloolik

ᐃᑦᑲᑎᑎᑎ  
Iqaluit

ᑭᑭᑭᑭᑭᑭ  
Kinngait

ᑭᑭᑭᑭᑭᑭ  
Pangnirtung

ᑭᑭᑭᑭᑭᑭ  
Pond Inlet

ᑭᑭᑭᑭᑭᑭ  
Qikiqtarjuaq

ᑲᑎᑎᑎᑎᑎᑎ  
Resolute Bay

ᑭᑭᑭᑭᑭᑭ  
Savikiluaq

Robin Ikkutisluk  
Licence Administrator  
Nunavut Water Board  
P.O. Box 119  
Gjoa Haven NU X0B 1J0

Ms. Ikkutisluk,

**RE: BAFFINLAND IRON MINES CORPORATION'S, MARY RIVER PROJECT, MODIFICATION REQUESTS FOR MILNE PORT AND MINE SITE ACCOMMODATION CAMP UPGRADES AND MILNE INLET FUEL STORAGE FACILITY**

In response to the Nunavut Water Board's (NWB) request, this letter provides the Qikiqtani Inuit Association's comments on the above referenced Baffinland Iron Mines Corporation (Baffinland) modification requests pursuant to Water Licence 2AM-MRY1325<sup>1</sup>.

As the Designated Inuit Organization for the Qikiqtani region, Qikiqtani Inuit Association (QIA) and Baffinland signed the Commercial Lease No. Q13C301<sup>2</sup> (Lease) for the Mary River mine in 2013. QIA's comments herein are focused on items as they relate to the Lease and QIA's role as the Designated Inuit Organization and its duties to administer Inuit Owned Lands.

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

- Adequate reclamation security
- Proposed activities completed under the Lease satisfy all other applicable environmental laws and regulations
- Updated Environmental Management Plans associated with water quality, quantity and flow
- For-construction and as-built documentation

The QIA notes that the proposed modification activities were a component of Baffinland's 2017 Work Plan addendum<sup>3</sup> and associated reclamation security. The QIA notes the modification activities and associated reclamation security have been assessed relative to the Lease and Baffinland has been notified of any requirements. The QIA and Baffinland are currently

<sup>1</sup> Nunavut Water Board (2015) Water Licence No: 2AM-MRY1325 Amendment No. 1. July 31, 2015.

<sup>2</sup> QIA and BIMC (2013) Commercial Lease No.: Q13C301. September 6, 2013

<sup>3</sup> NWB (2017). 170606 2AM-MRY1325 Submission of Baffinland 2017 Work Plan - BIMC - Mary River Project - Qikiqtani Region. June 6, 2017



# ᖃᑭᖃᖃᖃ ᐃᓄᐃᖃ ᑲᑲᖃᖃᑲᑲᖃᖃᖃ Qikiqtani Inuit Association

preparing a joint submission regarding reclamation security to the NWB that is inclusive of the proposed modification activities.

ᐱᖃᖃᖃᖃᖃ  
ᓄᓄᓄᓄᓄᓄ ᐃᓄᓄᓄᓄ  
Serving the  
communities of

ᐃᖃᖃᖃᖃᖃ  
Arctic Bay

ᑭᓄᓄᓄᓄᓄᓄ  
Cape Dorset

ᑲᖃᖃᖃᖃᖃᖃ  
Clyde River

ᐃᖃᖃᖃᖃᖃᖃ  
Grise Fiord

ᖃᓄᓄᓄᓄᓄᓄ  
Hall Reach

ᐃᖃᖃᖃᖃ  
Igloolik

ᐃᖃᖃᖃᖃᖃ  
Iqaluit

ᑭᖃᖃᖃᖃ  
Kinngait

ᑲᖃᖃᖃᖃᖃᖃ  
Pangnirtung

ᑭᖃᖃᖃᖃᖃ  
Pond Inlet

ᖃᑭᖃᖃᖃᖃᖃᖃ  
Qikiqtarjuaq

ᖃᖃᖃᖃᖃᖃᖃ  
Resolute Bay

ᖃᓄᓄᓄᓄᓄᓄ  
Sanikiluaq

**QIA comments regarding the Mine Site accommodation camp upgrade:**

- QIA expects to receive completed as-built plans and drawings as per Part G, Item 6 and Schedule D of the Water Licence.

**QIA comments regarding the Milne Port accommodation camp upgrade:**

- Page 6 of the modification request notes that “environmental monitoring of construction activities will consist of water quality monitoring and periodic environmental inspections”. The QIA notes that the frequency of “environmental monitoring” and “environmental inspections” is not detailed. This additional information is recommended to understand the potential impact to water quality, quantity and flow (thus relation to the Water Compensation Agreement) resulting from activities occurring partially within a drainage channel.
- For construction documentation H343004-400-228-272-0001-0001 (Attachment 3) and H353004-4000-228-271-0001-0001 (Attachment 4) of the modification request are for-construction drawings that are not signed and sealed by a Professional Engineer or contain a Permit to Practice stamp, as required by Part D, Item 1 of the Water Licence.
- QIA expects to receive completed as-built plans and drawings as per Part G, Item 6 of the Water Licence, as well as, sections 1.b, 1.c, 1.d, 1.g, 1.h, 1.k, 1n of Schedule D of the Water Licence regarding conditions applying to construction. The QIA looks forward to reviewing this information in the completed as-built documentation.

**QIA comments regarding the Milne Port Fuel Storage Facility:**

- QIA expects to receive completed as-built plans and drawings as per Part G, Item 6 and Schedule D of the Water Licence.

QIA would like to thank the NWB for considering these comments.

Sincerely,

Stephen Williamson Bathory  
Director Major Projects  
Qikiqtani Inuit Association