



November 14, 2014

ለጉብኝነት
ወደራሽ ይገቡ
Serving the
communities of

$\Delta^b \wedge \nabla^c \prec^b$
Arctic Bay

$P^{\alpha\alpha}\Delta^c$
 Cape Dorset

ᑭᓴᑦ ᑭᓴᑦ
Clyde River

Grise Fiord

Hall Beach

$\Delta^L \supset \epsilon^b$
Igloolik

$\Delta^b \rightarrow \Delta^c$
Iqaluit

ᐱᓚᑦ
Kimmirut

$\langle \sigma^a \sigma^b \rangle_Q$
Pangnirtung

Pond Inlet

Qikiqtarjuaq

Resolute Bay

Sanikiluaq

Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, Nunavut X0B 1J0

Dear Nunavut Water Board,

RE: 141014 2AM-MRY1325 SUBMISSION OF THE AQUATIC EFFECTS MONITORING PLAN

As requested¹ by the Nunavut Water Board (NWB), the Qikiqtani Inuit Association (QIA) provides this letter outlining its technical review of Baffinland Iron Mines Corporation's (BIMC) Aquatic Effects Monitoring Plan² (AEMP) submitted to fulfill Part I, Item 2 of the Type 'A' Water Licence 2AM-MRY1325. The QIA provides the following comments on the AEMP.

1. The QIA notes that the June 27, 2014 AEMP was submitted to the NWB in accordance with Part I, Item 2 of the Type 'A' Water Licence 2AM-MRY1325. It is the QIA's understanding that the scope of the Type 'A' Water Licence does not include the Early Revenue Phase (ERP) activities; BIMC has sought an amendment to their Water Licence³ to address the ERP and the NWB is currently completing a review of that amendment application⁴.

Therefore, the QIA's review of the AEMP is restricted to the current Water Licence scope and does not include a review of the ERP activities. Should the ERP activities be approved and the Water Licence amendment occurs, the QIA recommends that the AEMP be updated, reviewed and approved as a requirement of the amended Water Licence. The QIA therefore reserves the right to complete a review of the ERP components of the AEMP at a time when the activities are further understood, and not as part of the Water Licence amendment review process. The QIA's review of the Type 'A' Water Licence amendment (developed under a separate cover for submittal to the NWB) addresses preliminary comments regarding the ERP related components of the AEMP.

2. The AEMP is limited in the aquatic effects monitoring along the Tote Road and quarry/borrow sites. Each of these locations have construction, operations and/or closure activities that have

¹ NWB OCTOBER 14, 2014 Public Notice titled “141014 2AM-MRY1325 Submission of Aquatic Effects Monitoring Plan”.

² BIMC July 27, 2014 submittal to the NWT titled "Aquatic Effects Monitoring Plan BAF-H1-830-P16-0039 Rev 0".

³ BIMC July 16, 2014 Type A Water Licence application titled “Application for Amendment to the Type “A” Water Licence 2AM-MRY1325”.

⁴ NWB September 29, 2014 Public Notice titled “Licence 2AM-MRY1325, Type “A” – Notice of Amendment Application and Commencement of Technical Review Period for Mary River Project”.



Sanikiluaq