



March 13 2019

NWB File No: 2BE-EQE

Manager of Licensing
Nunavut Water Board
P.O. Box 119, Gjoa Haven
Nunavut, X0B 1J0
licensing@nwb-oen.ca

RE: Baffinland's Ege Bay Exploration Program Water Licence Application

Dear Ida Porter,

In our January 21 2019 submission, Qikiqtani Inuit Association (QIA) provided a list of 51 comments and associated recommendations to address issues related to Baffinland Iron Mine Corporation (BIMC) Ege Bay Exploration Program Type-B water licence application (the "Application"). On February 26 2019, the NWB asked parties to review Baffinland's responses to CIRNAC and QIA comments. QIA would like to thank the NWB for the opportunity to provide this submission based on the Application and Baffinland's responses.

QIA has reviewed the responses that BIMC provided and found that in most cases, BIMC has responded satisfactorily or partially satisfactorily to our comments identified in our January 21 2019 submission. The details of QIA's comments and recommendations on the Application are attached to this letter.

One key issue that remains unresolved, though not a required aspect of a Type-B water licence application, is the issue of reclamation security. QIA takes its stewardship of Inuit Owned Lands very seriously. QIA's approach to reviewing security estimates is done in accordance with QIA's "Abandonment and Reclamation Policy for Inuit Owned Lands". QIA has a history of working with BIMC, including on the issue of reclamation security, for the Mary River Project (under a Type-A water licence). Based on QIA's review of the BIMC Security Estimate (contained in Appendix B of the Closure and Reclamation Plan), the Security Estimate is not adequate. QIA is aware the NWB Type-B water licensing process is not the forum in which QIA and BIMC resolve this matter, but QIA nonetheless wants to ensure the NWB is aware of this issue.

At present, BIMC does not have a land use authorization from QIA for the Ege Bay project. We expect any access of the IOL for the project will only be done in compliance with QIA's land use requirements, including posting reclamation security agreeable to QIA.

Should you have any questions regarding our comments, please do not hesitate to contact me.

Sincerely,



Joel Fortier

Environmental Assessment Coordinator

Lands Department

Qikiqtani Inuit Association

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