

Appendix A QIA Technical Review Comments

Comment Number	QIA-1
Issue	Discussion of project activities completed to date
Reference	181207 A-7 Ege Bay Project Proposal, also relevant to supporting documentation and plans.
Discussion	<p>Project documentation is written from the perspective of a 2018 project commencement. It is understood that the full project scope did not proceed under the previous Type B Water Licence (2BE-EQE1926). However, the Non-Technical Summary document indicates that limited works and surveys were undertaken between 2018 and 2025.</p> <p>For example, the project proposal states that archaeological surveys would be conducted in June or July 2018 prior to sealift delivery of equipment and materials. In contrast, the Non-Technical Summary indicates that archaeological surveys of the proposed exploration area and camp locations were completed in the summers of 2018 and 2021.</p> <p>These differences suggest that while the original schedule was not fully implemented, components of the program were carried out between 2018 and 2025.</p>
Recommendation	The Project Proposal document and supporting documents, where relevant, should be updated to reflect work that has been completed to date, and expected project timelines under the licence renewal. Impacts of exploration works and mitigation measures should be updated based on the findings of completed surveys.

Comment Number	QIA-2
Issue	Proposed bathymetric and water quality surveys
Reference	181207 A-7 Ege Bay Project Proposal, Section 5.7, Page 16
Discussion	The project proposal states that Baffinland expects to conduct bathymetric surveys on the two lakes (Lake EB-1 and Lake EB-2) that will be used to supply water for the camp and exploration activities, as well as collect water quality samples from these waterbodies. It is unclear if these surveys have been conducted, and if so, how the findings have been used to inform relevant project plans including the Ege Bay Inspection and Monitoring Plan and Environmental Protection Plan.

Recommendation	Confirm if bathymetric and water quality surveys have been completed for Lake EB-1 and EB-2.
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Comment Number	QIA-3
Issue	Conditions for temporary closure
Reference	Closure and Reclamation Plan, BAF-PH1-400-P16-0003, Section 7, Page 42
Discussion	<p>The plan defines temporary closure according to the <i>Guidelines for the Closure and Reclamation of Advanced Mineral Exploration and Mine Sites in the Northwest Territories</i>, which states temporary closure occurs when a project ceases with the intent of resuming activities in the near future. It is unclear what timeframe would trigger the temporary versus permanent closure protocol.</p> <p>Specifically, concerns of an undefined temporary closure timeline are related to potential acid rock drainage (ARD) associated with proposed quarries. The Closure and Reclamation Plan does not specify temporary closure actions related to quarries. Temporary closure protocol must address mitigation related to quarries to minimize ARD potential to the maximum extent possible during temporary closure.</p>
Recommendation	<p>Define the term 'near future' to specify how long the project area could be left inactive before the temporary or permanent closure plan must be enacted. Update the temporary closure plan to include quarry and ARD considerations. The temporary closure plan should include a timeline for which ARD will be addressed consistent with permanent closure.</p>

Comment Number	QIA-4
Issue	Maintenance of temporary water intakes
Reference	Environmental Inspection and Monitoring Plan, BAF-PH1-400-P16-0004
Discussion	<p>The DFO (2020) guidance document Interim code of practice: End-of-pipe fish protection screens for small water intakes in freshwater recommends regular inspection, maintenance and cleaning of intake screens to prevent fish from being impinged. Specifically, screens in disrepair can result in uneven flow rates that increase the likelihood of harm to fish. The inspection and monitoring plan does not specify how intake screens will be inspected.</p>

Recommendation	Please update the Environmental Inspection and Monitoring Plan to specify that intake screens will be inspected weekly, or in accordance with DFO guidelines, whichever is more frequent.
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Comment Number	QIA-5
Issue	Collation of water consumption by source
Reference	Environmental Inspection and Monitoring Plan, BAF-PH1-400-P16-0004, Table 4-2, Page 13-14
Discussion	Table 4-2 indicates that for water intake from EB-2, Eqe-Pond-1 and Eqe-Pond-2 water consumption will be recorded by drill rig supply pump and collated by source. Where withdrawals occur from the same source at multiple locations, coordination is required to ensure that cumulative daily withdrawals do not exceed the limits established under the Type B Water Licence. It is not clear how water use will be tracked and communicated between withdrawal points to ensure compliance with source-specific daily use limits.
Recommendation	Please describe the procedures that will be implemented to coordinate and track water withdrawals where multiple intake points or drills draw from a single source. This should include how daily withdrawal volumes will be communicated between locations, how cumulative withdrawals will be calculated relative to licensed limits, and what controls will be in place to prevent exceedances.

Comment Number	QIA-6
Issue	Waste storage on site
Reference	Waste Management Plan, BAF-PH1-400-P16-0005, Section 7, Page 27
Discussion	<p>Section 7 of the Waste Management Plan describes how hazardous waste will be contained and temporarily stored on site prior to shipment offsite.</p> <p>Interim storage of hazardous waste represents a potential environmental risk if not properly designed and managed. Key considerations include the amount of hazardous waste that can be accommodated on site and frequency of shipment off site. These elements should be clearly defined to mitigate the risk of hazardous waste releases.</p> <p>It is understood that hazardous waste storage locations will be regularly inspected according to the Environmental Inspection and Monitoring Plan, BAF-PH1-400-P16-0004.</p>

Recommendation	Additional detail regarding hazardous waste storage on site prior to shipment off site should be provided. Additional information should include the frequency of shipments and expected volume relative to the capacity of hazardous waste storage on site.
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Comment Number	QIA-7
Issue	Intake pipe mitigation considerations
Reference	Environmental Protection Plan, BAF-PH1-400-P16-0001, Section 2.4, Page 21
Discussion	<p>“All water intake hoses shall be equipped with a screen of an appropriate mesh size (as approved by the DFO) to ensure that fish are not entrained. Additionally, operators will ensure the water intake hoses withdraw water at such a rate that fish do not become impinged on the screen.”</p> <p>The environmental protection plan notes that screen mesh size, and water withdrawal rates will be in accordance with DFO’s Interim Code of Practice: End-of-Pipe Fish Protection Screens for Small Water Intakes in Freshwater (DFO, 2020). In addition to mesh size and withdrawal rate requirements, Sections 2 and 3 of DFO’s Interim Code of Practice (2020) outline specific installation, placement, and maintenance measures intended to minimize harm to fish and fish habitat. The guidance document notes that screens should be placed away from natural or man-made structures that may attract fish that are migrating, spawning, or in rearing habitat. It is unclear whether these placement and maintenance considerations have been incorporated into the proposed approach.</p> <p>For winter withdrawals, compliance with the DFO (2010) Protocol for Winter Water Withdrawal from Ice-covered Waterbodies in the Northwest Territories and Nunavut requires characterization of ice thickness, total water depth at the intake location, and calculation of available under-ice water volume to ensure that withdrawals do not exceed recommended limits (e.g., <10% of available under-ice volume), and do not remove oxygenated surface waters that are critical to over-wintering fish. It is not clear how these parameters will be measured, calculated, or validated at the proposed intake locations.</p>
Recommendation	Please describe how installation, placement, and maintenance of water intake hoses and fish protection screens will be addressed within the Environmental Protection Plan. Specifically, please indicate how lake bathymetry and fish habitat use will be considered when placing intake pipes. The response should confirm alignment with DFO’s (2020) Interim Code of Practice: End-of-Pipe Fish Protection Screens for Small Water Intakes in Freshwater , including site selection and ongoing inspection/maintenance requirements (addressed in QIA-

	4). Winter withdrawal locations should also comply with DFO's (2010) Protocol for Winter Water Withdrawal from Ice-covered Waterbodies in the Northwest Territories and Nunavut .
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Comment Number	QIA-8
Issue	Bird protection measures
Reference	Environmental Protection Plan, BAF-PH1-400-P16-0001, Section 2.13, Page 41
Discussion	<p>This section describes how impacts to nesting birds will be mitigated through on-ground inspection prior to project activities. These methods will be conducted in accordance to Appendix C (Mary River Active Migratory Bird Surveys Protocol) of the Environmental Protection Plan. This protocol indicates that pre-disturbance surveys will be completed when works occur in undisturbed areas between May 31 and August 31. This timing is based on the ECCC (2025, Nesting periods - Canada.ca) predicted nesting period for nesting zone N10. It is not made clear in section 2.13 of the Environmental Protection Plan that these surveys will be conducted only during this time period.</p> <p>Additionally, the ECCC (2023) guidance document Guidelines to avoid harm to migratory birds - Canada.ca specifies "It is not recommended to mark nests using flagging tape or similar material. This may increase the risk of predators finding the nest. If necessary, flagging tape can be placed at the limits of the buffer zone."</p>
Recommendation	The Environmental Protection Plan should be updated to specify that surveys will be completed between May 31 and August 31. Additionally, it should be clearly noted that individual nests should not be flagged.

Comment Number	QIA-9
Issue	Caribou Protection Measures
Reference	Environmental Protection Plan, BAF-PH1-400-P16-0001, Section 2.12, Page 39
Discussion	<p>The Environmental Protection Plan outlines how disturbance to caribou will be mitigated during exploration activities.</p> <p>"Should pregnant caribou cows, cow with young calves be observed within one (1) kilometer of Ege Bay exploration activities, operations in the vicinity of sighted caribou activities will be assessed by the Environmental Representative and modified as required. If the caribou are determined to be disturbed by operational activities, the activity will be modified or cease until the caribou are no longer in the</p>

	<p>immediate area. The QIA and HTOs of nearby communities will be consulted if it is determined that modifications to operational activities may be required.”</p> <p>“Caribou occurrence in the vicinity of the road and their responses to traffic will be monitored by on the ground behavioral observations, to determine if it is apparent that caribou are being disturbed or displaced by traffic or exploration activities. Specific guidance is provided in the Caribou Encounter Decision Tree provided in Appendix B.” Appendix B is specific to caribou near roads and does not discuss disturbance or displacement caused by exploration (ex. drilling) activities.</p>
Recommendation	<p>The EPP should be updated to indicate how sightings of caribou and the subsequent decision-making process will be recorded. QIA and HTOs of nearby communities should be notified of all sightings requiring assessment by the Environmental Representative, not just those requiring modifications to operational activities.</p> <p>Also please clarify what actions will be taken if it is determined that caribou generally (non-pregnant, not cows with young) are disturbed or displaced by exploration activities.</p>

Comment Number	QIA-10
Issue	Dust Suppression
Reference	Ege Bay - Environmental Protection Plan, BAF-PH1-400-P16-0001, Section 2.20.2, Page 57
Discussion	Dust mitigation measures discussed in the EPP only mention quarry locations. Dust generation from proposed activities will also occur via drilling, road maintenance, road use and camp maintenance and use activities.
Recommendation	Please revise the EPP and associated documents to address and mitigate dust generation related to drilling, drill hauling/transportation, road creation and maintenance and any other potentially dust-generating activities associated with the proposed Ege Bay activities.

Comment Number	QIA-11
Issue	Water Supply Quantities
Reference	181207 A-7 Ege Bay Project Proposal, Section 2.2, Page 10
Discussion	References of water use are not always clearly defined with a unit timeline (per day, per week, per year, etc.)
Recommendation	Please ensure that all withdrawal volumes are communicated with a withdrawal rate (typically cubic metres per day)

Comment Number	QIA-12
Issue	Sewage and Grey Water Disposal
Reference	181207 A-7 Ege Bay Project Proposal, Section 2.3, Page 10
Discussion	<p>It is unclear how daily raw sewage rates versus greywater rates are calculated for the camp sewage and associated sewage treatment plant. It is mentioned that a second treatment plant unit may be required to provide treatment in excess of 11.4 m³/day. There should be a practical response mechanism that triggers the requirement for the second treatment plant unit to be constructed/installed (camp population?).</p> <p>The daily rate of water use at camp is estimated at 29 m³/day, which could result in three sewage treatment units required to provide enough treatment capacity. Presumably, all of the water used in camp may not generate sewage and some will become greywater, but those proportions and rates are not clearly communicated in the project proposal.</p>
Recommendation	<p>Please clarify what mechanism will result in the requirement of a second (or third) sewage treatment plant unit.</p> <p>Please clarify what rates of sewage vs greywater are anticipated based on the camp's population and proposed daily withdrawal rates of 29 m³/day.</p>

Comment Number	QIA-13
Issue	Wildlife Protection Procedures
Reference	Ege Bay – Spill Contingency Plan, BAF-PH1-400-P16-0002, Page 15 – 17
Discussion	<p>The Spill Contingency Plan indicates that in the instance of spills affecting wildlife trained personnel will collect impacted wildlife and then contact a number of wildlife treatment facilities/organizations, including CWS, for advisement on treatment. Table 4-1 lists these organizations and relevant areas of expertise.</p> <p>It is unclear how much, if any contact has been made to these organizations in relation to this issue. It is unclear if treatment or rehabilitation would be conducted by Baffinland staff or if wildlife would be sent to treatment facilities. If wildlife will be sent to any of the facilities listed in Table 4-1, has it been confirmed with these organizations that they can manage or provide the services listed?</p>

	<p>Additionally, the only mention of a permit for hazing, handling, or holding birds is vague. “Contact information for experts in bird hazing and bird exclusion, oiled bird rehabilitation, and permits required to haze, salvage, hold and clean, and/or euthanize birds, are outlined in Table 3-1.” For example, for hazing or deterrent activities it is understood that authorization would be required under the Migratory Birds Regulations, 2022. Instruction sheet: Applying for a migratory bird damage or danger permit under the Migratory Birds Regulations - Canada.ca.</p>
Recommendation	<p>Please clarify the role that external organizations are expected to contribute to wildlife treatment and rehabilitation. Please clarify if these organizations have been contacted in relation to their possible involvement and if it has been confirmed that they have the capacity to complete the responsibilities outlined in Table 4-1.</p> <p>Additionally, please update the Spill Contingency Plan to indicate that CWS will be contacted and all required permits/authorizations related to hazing, salvage, holding or euthanizing wildlife will be obtained prior to any associated activities.</p>

Comment Number	QIA-14
Issue	Fish Passage and Culvert Design/Construction
Reference	181207 A-7 Ege Bay Project Proposal, Figure 3
Discussion	<p>There is risk to creation of fish passage barriers with the installation of culverts on fishbearing streams. Even when appropriate substrate sizes are chosen to be consistent with existing habitat characteristics, the installation and maintenance of the substrate is important to maintain fish passage. During construction, an appropriate rock matrix should be installed with finer material backfilling any cobble/gravel to ensure surficial flow that enables consistent fish passage across all open water seasons.</p>
Recommendation	<p>Please ensure that culverts and associated stream works are completed to allow for surficial flow to maintain fish passage across all open water seasons, with reference to DFO’s Culvert Installations Factsheet.</p>

Comment Number	QIA-15
Issue	Sewage and Grey Water Disposal
Reference	181207 A-7 Ege Bay Project Proposal, Section 2.3, Page 10

Discussion	Greywater conveyance to an excavated sump for infiltration rather than treatment at the sewage treatment plant is mentioned. Sump sizing and the infiltration potential of the local soils need to be detailed in advance of this option to ensure that the sumps are never overflowing or risking erosion or physical/chemical environmental hard to the landscape.
Recommendation	Please provide design details relating to soil infiltration capacity and estimated sump sizing and greywater flow rates to any sumps in advance of sump construction to minimize risk to the local environment and/or landscape.

Comment Number	QIA-16
Issue	Sewage and Grey Water Disposal
Reference	181207 A-7 Ege Bay Project Proposal, Section 2.3, Page 10
Discussion	“Additionally, treated sewage effluent will be discharged to land” This represents a risk to the local flora and landscape as daily discharge may present soil erosion risk.
Recommendation	Please clarify how discharge to the land will be managed to prevent erosion or a change in vegetation community.
Comment Number	QIA-17
Issue	Drill Water Use and Disposal
Reference	Non-technical Summary 181207 A-7 Ege Bay Project Proposal
Discussion	The non-technical summary describes that RC drills do not require water or create waste, though diamond drills are also mentioned as types of drills used. The majority (270 m ³ /day) of withdrawals are described as used for the operation of the nine drill rigs. Only eight drills are mentioned in the non-technical summary, nine are mentioned in the other supporting documents. There is no clear mention of plans to handle and dispose of drill water to minimize potential environmental harm or disruption to habitat.
Recommendation	Please update the submission to detail how drill water will be handled, controlled and disposed of to minimize potential environmental harm or disruption to habitat.

Comment Number	QIA-18
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Issue	Draft version
Reference	Eqe Bay - Spill Contingency Plan Document Revision Record, p. 2
Discussion	The provided version of the Eqe Bay - Spill Contingency Plan dated March 20, 2026 (the Plan) is a draft. All documents submitted as part of an application package should be in their final form.
Recommendation	QIA recommends re-submission of the Eqe Bay - Spill Contingency Plan dated March 20, 2026 in its final form.

Comment Number	QIA-19
Issue	Planned updates
Reference	Eqe Bay - Spill Contingency Plan List of upcoming updates, p. 6 s. 4 Spill Response Procedures, p. 13 Appendix B “Eqe Bay Exploration Site Layout – Spill Kit Locations”, p. 29 Appendix C “Spill Response Supplies”, p. 31 Appendix D “Material Safety Data Sheets”, p. 33
Discussion	The text on page 6 of the Plan lists the information to be included in the next, undated update. The list includes some essential items, such as spill kit locations, spill response equipment, and MSDS. A safe operation of a project of this scale requires the inclusion of these items before any personnel arrives on location, especially considering that the Project has been active for some time now.
Recommendation	QIA recommends the listed updates to the Plan be made prior to mobilization to site.

Comment Number	QIA-20
Issue	Purpose of the Plan
Reference	Eqe Bay - Spill Contingency Plan s. 1.1 Purpose and Scope, p. 7
Discussion	The purpose of any management plan addressing emergencies ought to describe risk mitigation and emergency response measures. While this section aligns with that notion in the first paragraph, the second paragraph focuses on the Plan being a requirement to secure a water licence. The latter is certainly true; however, the Plan’s target audience is the field personnel rather than a regulatory body.

Recommendation	QIA recommends revising the entire document with the focus on the field personnel as the primary users of the Plan.
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Comment Number	QIA-21
Issue	Spill response schematic
Reference	Ege Bay - Spill Contingency Plan s. 1.2 Approach to Spill Response, p. 7
Discussion	This section of the document will benefit from a spill response schematic that clearly and briefly identifies the first steps in spill response, including the key personnel to be alerted and their contact details (there is currently only a mention of a “Supervisor”). The section should also identify the on-scene commander.
Recommendation	QIA recommends: a) expanding this section to ensure the ease of reference for the personnel implementing the Plan and b) addressing switching off ignition sources where possible.

Comment Number	QIA-22
Issue	Consistency
Reference	Ege Bay - Spill Contingency Plan Entire document
Discussion	The Plan contains several errors in numbering Tables. For example, the text on p. 16 referring to Table 3-1 is likely intended to refer to Table 4-1.
Recommendation	QIA recommends a careful review of the entire document to address any inconsistencies.

Comment Number	QIA-23
Issue	Incineration of used sorbent
Reference	Ege Bay - Spill Contingency Plan s. 5 Disposal of Spilled Product and Contaminated Material, p. 18
Discussion	Section 5 states, “[u]sed sorbent material will be burned in the incinerator as per incinerator standard operating procedures.” It is important to understand whether the incinerator in question is designed to handle this type of waste, whether incineration is going to be in line with Environment and Climate

	Change Canada’s Technical Document for Batch Waste Incineration (2010), and whether the operation of this incinerator is approved by relevant regulators.
Recommendation	QIA recommends that Baffinland provide more information on incinerating contaminated sorbent.

Comment Number	QIA-24
Issue	Risk mitigation
Reference	Ege Bay - Spill Contingency Plan s. 6.1 Fuel Spills, p. 19
Discussion	Section 6.1 states, “Stored fuel at site will be required to have secondary containment that meets the requirements of CCME’s Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products (2003).” QIA agrees with the usage of this Code. Listing the secondary containment requirements will greatly benefit the Plan and its target audience—the personnel responsible for implementation of the Plan. The responsible personnel must understand what equipment to mobilize on site and how equipment rig-up is to be performed to fulfill the requirements of this Code.
Recommendation	QIA recommends clearly listing the secondary containment requirements to be used in line with CCME’s Code.

Comment Number	QIA-25
Issue	Risk mitigation
Reference	Ege Bay - Spill Contingency Plan s. 6.1.3 Potential Fuel Spill Scenario 3: Overfill of Fuel Tank, p. 22
Discussion	Section 6.1.3 states, “[s]tationary equipment (i.e. generators, heaters) will be equipped with secondary containment, whenever possible.” While QIA understands that installing full secondary containment for stationary equipment may not always be possible, the use of drip trays is a widely accepted and effective mitigation measure.
Recommendation	QIA recommends the use of drip trays for stationery equipment, at a minimum.

Comment Number	QIA-26
Issue	Plan update

Reference	Eqe Bay - Spill Contingency Plan s. 6.1.4 Potential Fuel Spill Scenario 4: Spill During Fuel Transfer From Sealift Barge, p. 23
Discussion	In this section, Baffinland commits to developing procedures for spill response during offloading of fuel during sealift. QIA notes that the NWB required in Part H, Item 2(d) of Water Licence No: 2BE-1926 the submission of an updated Plan “outlining the spill response procedure during fuel transfer activities from a sealift barge” sixty days before undertaking fuel transfer.
Recommendation	QIA supports inclusion of a similar condition in the licence should the Board grant this renewal licence application.

Comment Number	QIA-27
Issue	NU-NT Spill Report Form
Reference	Eqe Bay - Spill Contingency Plan Appendix A “NU-NT Spill Report Form”, p. 27
Discussion	The spill report form is missing from Appendix A.
Recommendation	QIA recommends the inclusion of the NT-NU Spill Report Form.

Comment Number	QIA-28
Issue	Spill response supplies and equipment
Reference	Eqe Bay - Spill Contingency Plan Appendix C “Spill Response Supplies”, p. 31
Discussion	The Plan outlines spill response measures requiring various equipment, such as vacuums, pumps, skimmers, a boat, weirs, and an oil-water separator. The Plan and the personnel responsible for its implementation will greatly benefit from a list of this equipment in Appendix C.
Recommendation	QIA recommends updating Appendix C with the list of equipment to be utilized during spill response.

Comment Number	QIA-29
Issue	Material Safety Data Sheets
Reference	Eqe Bay - Spill Contingency Plan Appendix D “Material Safety Data Sheets”, p. 33
Discussion	Appendix D does not contain MSDS.
Recommendation	QIA recommends the inclusion of MSDS in Appendix D.

Comment Number	QIA-30
Issue	Risk mitigation
Reference	Ege Bay - Spill Contingency Plan Entire document
Discussion	<p>The Plan mainly focuses on the important issue of spill response. Risk mitigation, however, is addressed sparingly throughout the document and piecemeal. The personnel implementing the Plan will greatly benefit from the inclusion of a separate dedicated section on mitigation of spills. The section should address, at a minimum:</p> <ul style="list-style-type: none"> • Mandatory training, • Toolbox talks, • Regular walk-throughs and inspection of all equipment by the site supervisor, • Shift handovers, • Ensuring spill kits and the Plan are available where Project activities take place (e.g., drilling locations away from the camp), and • Regular OHSE inspections.
Recommendation	QIA recommends the inclusion of a separate section on risk mitigation measures.