



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
918 Nunavut Drive
Iqaluit, NU, X0A 3H0

Your file - Votre référence
2BE-EQE1926
Our file - Notre référence
GCDOCS#143851566

May 25, 2026

Robert Hunter
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
E-mail: licensing@nwb-oen.ca

Re: Crown-Indigenous Relations and Northern Affairs Canada's Review of the Licence Renewal Application for EQE Bay Project, Type B Water Licence No. 2BE-EQE1926

Dear Robert Hunter,

Thank you for the 28 April 2026 invitation to review the Renewal application, submitted by Baffinland Iron Mines Corporation (Baffinland), for Type B Water Licence No. 2BE-EQE1926.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the application pursuant to its mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Crown-Indigenous Relations and Northern Affairs Act*. Please find CIRNAC comments and recommendations in the attached Technical Memorandum.

The applicant shall provide confirmation from the Nunavut Water Board that all outstanding water license fees have been paid in full prior to approval of this application.

If there are any questions or concerns, please contact William Quere at william.quere@rcaanc-cirnac.gc.ca or (873) 452-1981 Or Andrew Keim at (867) 975-4550 or Andrew.keim@rcaanc-cirnac.gc.ca.

Sincerely,

William Quere, BSc
Regional Coordinator

Canada 



Technical Review Memorandum

Date: 25 May 2026

To: Robert Hunter – Licensing Administrator, Nunavut Water Board

From: William Quere – Regional Coordinator, CIRNAC

**Subject: Crown-Indigenous Relations and Northern Affairs Canada’s Review of
the Licence Renewal Application for EQE Bay Project, Type B Water
Licence No. 2BE-EQE1926**

Region: Kitikmeot Kivalliq Qikiqtani

A. BACKGROUND

Baffinland intends to establish an exploration camp at Ege Bay where surveys initially began in 2018 and 2021. They intend to establish a 50 person camp to eventually become a 100 person camp. This camp will include an incinerator, water treatment plant, sewage treatment plant, and 11 trailers that will use up to 299 m³ of water a day between drilling and the camp. Workers and supplies will be delivered from Mary River by twin otter using either floats or tundra tires. The camp is located at Latitude: (69° 37' 48.95" N) Longitude: (76° 39' 47.38" W) in the Qikiqtani region. The current renewal is for ten years for water licence 2BE-EQE1926 which expired April third 2026.

CIRNAC provides the following comments and recommendations pertaining to the application package. A summary of the subjects of recommendations can be found in Table 1. Documents reviewed as part of this submission can be found in Table 2 of Section B. Detailed technical review comments can be found in Section C.


Table 1: Summary of Recommendations

Recommendation Number	Subject
R-01	Closure and Reclamation Plan
R-02	Effluent Discharge to Water
R-03	Closure Uncertainties
R-04	Reclamation Estimate
R-05	Spill Contingency Plan
R-06	Open Burning Ash Control and disposal
R-07	Change Log Updates

B. DOCUMENTS REVIEWED AND REFERENCED

The following table (Table 2) provides a list of the documents reviewed under the submission and reference during the review.

Table 2: Documents Reviewed and Referenced

Document Title	Author, File No., Rev., Date
260416 2BE-EQE1926 Att 1-Project Description_EN_IN-ILAE	Baffinland, N.D
260416 2BE-EQE1926 Att 2-Project-Proposal-ILAE	Baffinland, April 2026
260416 2BE-EQE1926 Att 3- Eqe Bay Figures - As Sent-ILAE	Baffinland, March 2026
260416 2BE-EQE1926 Att 4-260416 - Application for Water Licence Renewal-ILAE	Baffinland, April 2026
260416 2BE-EQE1926 Att 5-2026-04-15-NPC File No 151133 Eqe Bay Exploration Program-ILAE	NPC, April 2026
260416 2BE-EQE1926 Att 6-Corporate Profile Report - BIM Corporation - May 12, 2025-ILAE	Ontario, May 2025
260416 2BE-EQE1926 Att 7-NIRB Screening Decision-ILAE	NIRB, August 2018
260416 2BE-EQE1926 Att 8-Type B Renewal Compliance Assessment-ILAE	Baffinland, April 2026
260416 2BE-EQE1926 Att 9-BAF-PH1-400-P16-0003 r1 - Eqe Bay Closure and Reclamation Plan_signed-ILAE	Baffinland, March 2026
260416 2BE-EQE1926 Att 10-BAF-PH1-400-P16-0002 r2 - Eqe Bay Spill Contingency Plan_signed-ILAE	Baffinland, March 2026
260416 2BE-EQE1926 Att 11-BAF-PH1-400-P16-0004 r1 - Eqe Bay Inspection and Monitoring	Baffinland, March 2026



Document Title	Author, File No., Rev., Date
Plan_signed-ILAE	
260416 2BE-EQE1926 Att 12-BIM-5200-PLA-0004-Sampling Program- Quality Assurance and Quality Control Plan-ILAE	Baffinland, May 2025
260416 2BE-EQE1926 Att 13-BAF-PH1-400-P16-0005 r1 - Ege Bay Waste Management Plan_signed-ILAE	Baffinland, March 2026
260416 2BE-EQE1926 Att 14-BAF-PH1-400-P16-0001 r1 - Ege Bay Environmental Protection Plan_signed-ILAE	Baffinland, March 2026
260416 2BE-EQE1926 Cover Letter Type B WL Renewal-ILAE	Baffinland, April 2026
190327 2BE-EQE1926 OAKE	April 2019



C. RESULTS OF REVIEW

1. Closure and Reclamation Plan

Comment:

The Closure and Reclamation Plan appears to have mislabeled or absent material throughout including placeholder licence names in the introduction as well as Appendix C and D appear to be missing from the document. The dates and page numbers appearing in the headers of the document appear to be mislabeled as well. There is a concern that we have received a plan that is not ready for review. There is also no change log to mark the differences between the 2019 document and the current plan for review.

Recommendation:

(R-01) CIRNAC recommends that Baffinland correct any outdated information throughout the document and ensure all material that is supposed to be in the plan is appropriately attached. Further, Baffinland should include a change log to clarify differences between the old plan and this current one.

2. Effluent discharge to water

Comment:

Section 4.4.5 of the Closure and Reclamation Plan states

“Camp sewage will be treated using a package sewage treatment plant prior to effluent being discharged to land for runoff into Ege Bay.”

There is a concern that this may go against the issued licence which states

“Discharge at Monitoring Program Station Ege-STP-1 (Final Discharge Point from the Sewage Treatment Plant) shall be located at a distance of at least thirty one (31) metres above the ordinary high water mark of any water body, at a site where direct flow into a water body is not possible and no additional impacts are created, unless otherwise approved by the Board in writing.”

There is a concern that discharging to land such that the runoff enters the bay may be against the licence. There is also no description of how the effluent is discharged onto the land and what is capturing or channelling it.

Recommendation:

(R-02) CIRNAC recommends that Baffinland clarify how this discharge into the bay is in compliance with the issued licence. CIRNAC also recommends that the discharge point for the sewage treatment plant be described as to what the water is being deposited into and how it is channeled into the bay.



3. Closure uncertainties

Comment:

The Closure and Reclamation Plan states throughout that there are uncertainties in areas such as infrastructure, contaminated soil, and revegetation. The concern is there does not appear to be plans or actions listed to address these uncertainties in the future.

Recommendation:

(R-03) CIRNAC recommends Baffinland describe why these areas are uncertainties and the actions that will be taken to resolve these issues during the life and closure of the exploration.

4. Reclamation estimate

Comment:

Section 10 of the Closure and Reclamation Plan states that

“The financial cost of the Ege Bay Exploration Program closure and reclamation has been estimated using the Hatch Estimate Breakdown Structure (EBS) Model developed for the Mary River Project. The Hatch EBS Model was utilized over CIRNAC’s RECLAIM Model based on previous discussions with QIA and in keeping with the QIA’s Abandonment and Reclamation Policy.”

The concern is that the differences between the two models are not stated and QIA’s recommendation to use EBS is not shown.

Recommendation:

(R-04) CIRNAC recommends Baffinland explain the difference found between estimate models and provide reasoning for this preference. Baffinland should also provide QIA’s recommendation to use Baffinland’s model.

5. Spill Contingency Plan

Comment:

Elements are missing from the spill contingency plan such as spill kit locations, MSDS sheets, and the spill report form. Some of these elements have been mentioned to be added in a later update while the spill report form seems to have been overlooked. The concern is that the spill kit locations and MSDS sheet will be needed to be added before activities commence to ensure adequate spill protection and documentation.

Recommendation:



(R-05) CIRNAC recommends that Baffinland include the missing elements and complete the change log to flag any changes between the current document and the previous.

6. Open Burning Ash Control and disposal

Comment:

The Waste Management Plan mentions the open burning of untreated wood but does not mention how ash would be controlled or disposed of afterward. The concern is that there is no ash control plans for the open burning activities.

Recommendation:

(R-06) CIRNAC recommends that Baffinland adjust incineration timelines to make increase time available for the burning of untreated wood. In lieu of this, an ash control plan should be created for the future open burning area including the area description and methods for controlling the waste before, during, and after (ash recovery and disposal).

7. Change Log updates

Comment:

The change logs of the plans given for the application have either not been updated or do not fully account for changes made between versions. The concern is these change logs are necessary for evaluating changes against previously approved methods.

Recommendation:

(R-07) CIRNAC recommends Baffinland ensure all plans provided with this application include complete and updated change logs.