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Qikiqtani Inuit Association

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Serving the communities of

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Arctic Bay

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Clyde River

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Grise Fiord

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Igloolik

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Iqaluit

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Kimmirut

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Kinngait

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Pangnirtung

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Pond Inlet

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Qikiqtarjuaq

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Resolute Bay

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Sanikiluaq

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July 31, 2025

Keith Morrison
Manager, Project Monitoring
Nunavut Impact Review Board

RE: **Comment Request for Baffinland Iron Mines Corporation's Mary River Project, 2025 Annual Monitoring Report**

Dear Mr. Morrison,

The Qikiqtani Inuit Association (QIA) appreciates the opportunity to provide comments on the Mary River Project ("the Project") 2025 Annual Monitoring Report ("the Report") submitted by Baffinland Iron mines Corporation ("BIMC", "Baffinland", or "the Proponent") to the Nunavut Impact Review Board ("NIRB").

Comments specific to Project Certificate Conditions ("PCCs") are provided in an excel file submitted with this letter. Comments that are in respect of multiple PCCs or in respect of the Report Appendices are provided in Appendix A. Comments in Appendix A are categorized into the following themes:

1. General (QIA 2025 NIRB GC#X)
2. Dustfall (QIA 2025 NIRB DF#X)
3. Terrestrial Environment (QIA 2025 NIRB TE#X)
4. Water and Sediment Quality (QIA 2025 NIRB WSQ#X)
5. Marine and Aquatic Environment (QIA 2025 NIRB MAE#X)
6. Geotechnical (QIA 2025 NIRB GT#X)
7. Socioeconomic Environment (QIA 2025 NIRB SE#X)
8. Inuit Knowledge, Culture, Land and Resource Use and Inuit Qaujimajatuqangit (QIA 2025 NIRB CRLU/IQ#X)

Outcome of Review

In response to NIRB's request for a compliance update, including compliance monitoring and/or site inspections, QIA submits the following:

- There have been no terms and conditions from the Project Certificate directly incorporated into any permits, certificates, licences, or other approvals issued for the



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- Ongoing issues identifying effects from the project / implementing the defined monitoring programs;
- Data are not presented with statistical analysis or in tables for both groundwater and fish health. This makes the data difficult to interpret and verify Baffinland's conclusions;
- Weight of evidence is not clearly articulated (i.e. limited linkage between fish endpoints and supporting lines of evidence such as water quality, productivity, sediment and benthic invertebrate community trends);
- Lack of consistent alignment of CREMP and TARP reduces confidence that action levels are being correctly identified;
- Lack of a targeted marine bird monitoring program to determine habitat use, areas and timing of interaction with Project activities and behavioural responses to vessels.



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QIA continues to be concerned by increased lichen-metal concentrations relative to baseline conditions and increased concentration above lichen indicator values. Specifically, it remains



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Attachments: Appendix A: QIA comments on Baffinland 2025 Annual Monitoring Report; Appendix B 2025 QIA Environmental Inspection Reports