November 14, 2025

William Bowden
Environmental Manager
Baffinland Iron Mines Corporation
360 Oakville Place Drive, Suite 300
Oakville, ON L6H 6K8
William.Bowden@baffinland.com

RE: Mary River Project – Qikiqtani Inuit Association September 2025, 2nd Annual Environmental Inspection Findings and Recommendations

Dear Mr. Bowden,

Consistent with requirements under Schedule E, Item 12 of the Commercial Lease[1] No.: Q13C301 (CPL), issued to Baffinland Iron Mines Corporation (Baffinland) by the Qikiqtani Inuit Association (QIA), the QIA conducted a Site Inspection (Inspection) of the Mary River Mine (Project) in September 2025. Andrew Jaworenko of QIA conducted the inspection with technical support provided by Joe Cavallo and Chloe Robinson of LGL Ltd. An overview of the inspectors' findings and recommendations is provided below.

The September 2025 Environmental Inspection Report has been appended to this letter for Baffinland's reference. Requested actions are outlined in **Table 1** of the report.

If you have any questions or would like to discuss details, please feel free to contact me at your earliest convenience.

Qujannamiik,

A Jaworenko

Andrew Jaworenko
Environmental Specialist
Qikiqtani Inuit Association
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[1] QIA and Baffinland (2013). Commercial Lease No.: Q13C301

September 2025 Site Inspection

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From: Chloe Robinson, Biologist, LGL Limited
Joseph Cavallo, Senior Biologist, LGL Limited

Date: 5 November 2025

RE: Water License 2AM-MRY1325 – Mary River Project Follow up Report to September 2025 Environmental Inspection

1 Introduction

Consistent with requirements under Schedule E, Item 12 of the Commercial Lease issued to Baffinland Iron Mines Corporation (Baffinland) by the Qikiqtani Inuit Association (QIA), Joe Cavallo and Chloe Robinson on behalf of LGL Limited (LGL) along with QIA representative Andrew Jaworenko conducted a scheduled Environmental Inspection (Inspection) of the Mary River Mine on September 17th and 18th, 2025. This was the second inspection of the year, following the site visit conducted by Dr. Mitchell Kay (LGL) and Assol Kubeisinova (QIA) in June 2025.

The governing objective of this report is to identify issues that in any way undermine or compromise QIA's mission to safeguard "the land, waters and resources" that sustain Qikiqtani Inuit within the Inuit homeland. An overview of the Inspectors' findings and requested actions are provided below. Photographs associated with the findings and requested actions made by LGL are provided in Appendix A.

2 Review of Reports

The following reports were received and reviewed prior to and following the completion of the Inspection. A summary produced by Baffinland is provided for each report.

Release Pond MS-06; NT-NU Spill Report – July 17, 2025; Water Licence No. 2AM-MRY2540

- Sedimentation Pond MS-06 at Mary River, was being closely monitored for freeboard during a prolonged rainfall event. On July 15th Operations initiated a pond to pond transfer to ensure sufficient freeboard could be maintained. A controlled discharge, along with continued transfer of compliant pond water was initiated at approximately 1:00 pm on July 16, however inflows to the Pond collection ditch exceeded the withdrawal rate, resulting in a slow release of compliant water over the emergency spillway at 18:09. The release over the spillway was approximated at 1,800 litres per hour. Continued removal via increased transfer with water trucks reduced the pond freeboard below the spill way and the uncontrolled release ceased by 21:30. Pond to pond transfer is ongoing. Samples to characterize the release were immediately

collected and will be included in the follow up report. This spill is being reported as required by the conditions of Water License no. 2AM-MRY2540, Part H, item 9(b) pursuant to subsection 12(3) of the Nunavut Waters and Nunavut Surface Rights Tribunal Act and as required by subsection 38(5) of the Fisheries Act.

Snowmelt Seepage Waste Rock Facility; Follow-up to Spill #2025-264 – July 21, 2025; Water Licence No. 2AM-MRY2540

- On June 20, 2025, routine monitoring observed snow melt water within the Waste Rock Facility (WRF) West perimeter ditch seeping through a defined location of the ditch to the adjacent tundra. Upon aerial survey reconnaissance, the water was not observed to be entering potential down-gradient receiving water bodies and was confined to the tundra plateau adjacent to the WRF. The seepage was observed to be filtering through a previously installed coarse rock fill patch intended to repair road settlement. Upon discovery, the ditch was further cleared of snow from recent accumulation to improve freeboard and flow within the ditch and an impermeable repair patch was installed which fully stopped the seepage. Water quality samples collected on June 20 at the seepage location to characterize the water quality and potential lethality of the seepage indicated elevated levels of Total Suspended Solids (TSS). However, laminar flow and rocky ground likely impacted sampling conditions that could not be mitigated by sampling technique, potentially elevating TSS measurements during collection. Results of additional water quality samples collected on June 21 at down-gradient receiving environment monitoring station K0-01 indicated there was no potential impact to the downstream receiving environment from the seepage.

3 Site Inspection Observations

Joe Cavallo, Chloe Robinson and Andrew Jaworenko (the Inspectors) arrived at site on the morning of Wednesday September 17th and departed on the morning of Friday September 19th. The Inspectors were escorted by a member of Baffinland's Site Service Department, William (Bill) Bowden, Environmental Manager. The morning of September 17th was used to review the schedule developed by Baffinland with input from QIA/LGL prior to the inspection. The afternoon (13:30 – 17:30) of September 17th focused on inspecting the infrastructure located on the mine site around Sailiivik Camp (also referred to as the Mary River Mine site). On the second day (08:30 – 16:00) the remaining locations at the mine site (CV187, Camp Lake and Camp Lake Tributary, and the Oil Water Separator) were visited before evaluating watercourse crossings along the Tote Road and the infrastructure located at Milne Port. Special attention was given to regions of the project area that were affected by the unprecedented rain event during September 2024, culverts experiencing issues from permafrost melt and/or ice lenses, and issues identified during the June 2025 as well as previous inspections.

The air temperature remained around 1 °C and was sunny during the two-day inspection. There were no visibility issues due to rain or fog, which provided opportunity to conduct a thorough inspection of the project area. Inspectors (Joe Cavallo, Chloe Robinson and Andrew Jawrenko) and Bill were joined by additional Baffinland personnel with specific operational expertise related to areas being inspected. Further detail on the areas inspected and associated Baffinland personnel is discussed below.

3.1 Waste Rock Facility

On the morning of September 17th, the Inspectors travelled with Bill and Jacob Prince via light duty truck from Sailiivik Camp to the waste rock facility at the top of the mountain. Snow cover from a precipitation event the previous week hampered visibility of the pond, treatment facility and surrounding tundra. The waste rock treatment facility was not online during the inspection. While inspecting the waste rock stockpile and pond, Bill noted that potentially acid generating (PAG) rock has been capped with non-acid generating (NAG) rock. This capping, in addition to silt curtains within the pond, has reduced the frequency of treatment required. Water has only been treated once in 2025 during the spring season. Water levels in the pond were low and mostly frozen at the time of

inspection. The Inspectors also visited the area where snowmelt seepage from the west perimeter ditch of the stockpile was recorded on June 20, 2025. Bill explained that snow had filled the ditch resulting in a diversion of flows and the release of snowmelt water into the surrounding tundra. The release was estimated to have occurred for 6 hours. Bill indicated that the water did not reach any watercourse as confirmed with ariel surveys. While snow cover reduced visibility in the area, no concerns related to the event were noted.

3.2 KM106

There were no observed changes to the ore stockpile located at KM106. Baffinland has continued to follow previous recommendations to pile fine sediment in locations less likely to cause large-scale erosional events. As reported during the June 2025 inspection, no impacts were observed related to the release of contact water from the KM106 stockpile on June 6th, 2025. It was further confirmed with Bill that the release was contained to the ditch along the stockpile and pumped into the KM106 pond.

The water level in the KM106 pond was low and no concerns were noted related to the pond or liner. Bill informed the inspectors that the area to the north of the pond, where sediment has been observed during previous inspections served as a former drainage gully prior to the construction of the KM106 pond. This feature is no longer in use, but this information allowed the Inspectors to confirm that previously noted sedimentation was not the result of an accidental release.

3.3 KM105 Infrastructure

3.3.1 Upstream Chemical Dosing Location

Due to time constraints, the upstream dosing location was not inspected during the September 2025 site visit. It was noted that dosing currently consists only of flocculant as needed, as the lime (calcium) and ferric acid treatments are no longer utilized.

3.3.2 Filter berm

The Inspectors proceeded to the newly constructed filter berms downstream of the chemical dosing station and upstream of the KM105 dam. Bill informed the Inspectors that the filter berms were not engineered, but Baffinland will design properly engineered structures if the filter berms become ineffective. The two filter berms appeared to be functioning well; however, it has been noted that relatively moderate flows were experienced during the 2025 spring freshet. Inspectors noticed that a large amount of fine sediment has collected downstream of the second filter berm. Inspectors estimate that the sediment in this area is likely greater than 1 m in depth (based on observations since 2022). The accumulation of this sediment poses a risk for mobilization during future high-flow events. It was discussed with Bill, that this sediment should be removed from the area to prevent migration further downstream during higher flow conditions.

3.3.3 KM105 Pond

The KM105 dam is now functioning as a large filter berm due to the permeability of the structure. Water flowing through the structure was clear. No turbidity or fine sediments were noted in the tundra downstream of the KM105 dam. The Inspectors noted an upwelling to the southwest of the dam which may be where water is flowing under the structure. The filter bag/geotube system was still in place but is no longer being used. Inspectors noted that controls and materials, including the geotube system, that are no longer in use should be removed from the site.

3.3.4 Polishing pond and final discharge point

At the polishing pond, two silt curtains were in place. One curtain was installed in the middle of the pond and another just upstream of the proposed final discharge location (MS-11). As observed throughout the treatment

chain, water was very clear both in the pond and at the final discharge point. As mentioned during the previous inspection, Bill indicated that a structure at the final discharge location is in the process of being designed. Bill could not provide information as to what this structure will look like but indicated the goal will be to control flows at the final discharge point. The Inspectors voiced concerns that similar issues to those experienced with the KM105 dam may occur with the construction of this structure.

3.4 Sheardown Tributary

The Inspectors travelled downstream to the confluence of Sheardown Tributary and Sheardown Lake. The water was very clear, with the lowest turbidity observed during recent inspections. This observation is consistent with that observed by Dr. Kay in June of 2025. This observation is likely the result of improvements throughout the upstream treatment train and generally low flows at the time of inspection.

3.5 Crusher Pad

The Inspectors and Bill toured the crusher pad under the direction of Spencer Stinson (Baffinland). Water levels were low in the crusher pond at the time of the inspection. Baffinland informed the Inspectors that the main parameter of concern in the pond is TSS, and that metal concentrations are always below targets. The Inspectors walked the entire berm around the pond. Some areas of sediment deposition and scouring were noted in the berm. Spencer indicated that the structure is maintained regularly throughout the year, a process that has been made easier with aggregate now accessible from an adjacent production site. Spencer also informed the Inspectors that dedicated lines and pumps now exist to better handle pumping to and discharging from the pond. A bermed containment area has been constructed east of the pond where runoff was found to be collecting. This water is now contained in this location and pumped into the pond as required.

Next, the Inspectors visited the crusher pad where both ore (class 1 and class 3) and aggregate are crushed. The crushers were not in operation during the inspection. The main topic of discussion was dust suppression during the crushing process. Spencer informed the Inspectors of the use of dust suppression product and showed the Inspectors how the product is applied at two points in the crushing process. Spencer explained that both aggregate and ore are treated. However, only fines, and not lump is being treated currently. The inspectors enquired about the specifications of the dust suppression product and Spencer indicated there has been communication with the distributor and the product is being used according to manufacturer specifications.

3.6 CV187

The two culverts at this crossing next to Sailiivik Camp were completely blocked during the June 2025 inspection. At the time, Baffinland had resorted to pumping water across the road. These culverts were replaced only days after the June inspection and were in good repair at the time of the September 2025 visit. In addition to culvert replacement, the embankment had been stabilized with armored stone. Some minor concerns related to exposed fines on the north side of the crossing were noted by the Inspectors. Overall, there has been vast improvement at this crossing. Bill explained that the area to the southeast of the crossing is expected to be developed as a loading site for the Steensby Rail. Plans to build an additional water management structure at this location have been put on hold indefinitely.

3.7 Camp Lake and Camp Lake Tributary

No concerns related to water quality were noted at Camp Lake or Camp Lake Tributary. As observed across the mine site, turbidity was very low, and erosion and sediment controls were working as intended. The armoring along the slope adjacent to Camp Lake was in good condition. Debris including old silt curtains and Styrofoam floats was present along the beach at Camp Lake. This debris should be cleaned up to prevent it from breaking apart and dispersing into the lake and surrounding habitat. This issue has been documented previously and reinforces the

general recommendation to clear unused materials and debris from the site. Bill informed the Inspectors that the culvert at the Camp Lake Tributary would eventually be replaced, however the issue has been deemed non-urgent as there is still flow through the culvert.

3.8 Oil Water Separator (Adjacent to the Airstrip)

The Inspectors visited the oil/water separator located adjacent to the airstrip (south side) where minor concerns were noted during the June 2025 inspection. Specifically, during the previous inspection unlabelled totes were observed in standing water. At the time of the current inspection, these totes were labelled as 'wastewat,er'. It was also explained that the standing water previously noted is the wastewater being treated in the first step of the oil/water separation process. The oil/water separator appeared to be working as intended. There was very little wastewater within the bermed containment area, and the Inspectors understand that very little water is discharged to the tundra at the end of the separation process.

4 Tote Road

The focus of the second day of the inspection, September 16th, 2025, was the Tote Road as well as Milne Port. At KM33, the truck the Inspectors and Bill Bowden were travelling in broke down. Bill and the Inspectors were picked up by Matt Weaver (Baffinland) who joined the group for the remainder of the inspection.

Throughout the inspection, the ongoing issue of dust generation was noted along the Tote Road. Bill informed the inspectors that calcium chloride and water continue to be applied to the road as a method of dust suppression. It was noted that there were areas of notable dry conditions along the road generating large amounts of dust, while other areas were moist, generating little to no dust. It was unclear if the areas not generating dust were treated, or simply areas that retained more moisture.

4.1 KM97

The first stop during the inspection of the Tote Road was the KM97 Bridge. Bill explained that the bridge had been reinforced with a buried sea can at each approach. This reinforcement appears to have been successful, and the Inspectors did not note any concerns related to the bridge. Two CSP culverts just east of the bridge were inspected and Inspectors noted that the culverts were perched. However, as the main flow of the watercourse is directed under the bridge, it was determined that these culverts do not impede fish passage at this crossing.

4.2 CV001 @ KM95

Bill explained that the two CSP culverts at this location provided a strong example of the success of culverts designed with consideration of site-specific conditions. The culvert replacement at KM95 occurred during the 2024-2025 winter season. The main culvert is embedded and is functioning well. At this crossing Bill also showed inspectors an example of the new fish crossing signs. These signs have been installed at all fish bearing crossings along the Tote Road. These signs will assist in implementing the snow management plan by indicating areas where snow piling is prohibited.

4.3 BG27 @ KM87.5 Washout

This site, next to Davids's Lake, experienced significant erosion during the September 2024 unprecedented rain event. During the June 2025 inspection it was noted that washout in the area may have resulted in a pool where fish could potentially be isolated. During the current inspection, the Inspectors did not notice any isolated pools and had no concerns about fish movement south of the Tote Road, upstream of David's Lake. The three culverts here were perched with significant erosion having occurred on the embankment. Bill and the Inspectors agreed these culverts presented a barrier to fish passage. Bill informed the Inspectors that a fish salvage had been

performed in this location, and that these culverts would be repaired, either through replacement or retrofitting, this winter following the original DFO authorization. Another culvert further to the north at this location was not perched and functioning as intended.

4.4 CV216 @KM81

This site was a focal location of the September 2025 inspection. These 5 culverts were replaced in 2024 after structural problems were identified with the former culverts. Due to complication that likely involve an ice lens in the location, the culverts experienced significant vertical and horizontal compression, and all 5 culverts are completely blocked. Emergency work is scheduled to occur on the crossing within 2 weeks of the inspection (week of September 25th), with the plan to move the Tote Road 30 m upstream (south). Once the new road and crossing is constructed, the existing crossing will be removed entirely. At the time of inspection, plans were in review with DFO. The Inspectors had concerns that the same issues associated with the ice lens would occur at this new crossing. We asked that Bill/BIM provide an update to QIA once the repairs were completed at this location.

4.5 KM80

Similarly to the KM97 bridge, this bridge was reinforced by burying sea cans at the approach of both side, with the goal of improving the stability of the bridge and Tote Road. There were no concerns noted at the KM80 bridge.

4.6 CV78 @ KM64

This location experienced heavy rainfall and extremely high flows during the unprecedented rain event in September 2024. Since the event, significant upgrades have occurred at this crossing including armouring of the embankment along the Tote Road, the replacement of 2 culverts, and the installation of check dams. The Inspectors noted that fine sediment had collected in the check dams east of the Tote Road and should be cleaned out to prevent sediment from being flushed downstream during high flows. While the culverts were in good condition at the time of inspection the Inspectors did note that the size of culverts seemed small considering the high flows experienced in this area during rain events.

On the west side of the Tote Road, at least 3 culverts remained on the tundra. These culverts were washed out during the September 2025 rain event. These culverts should be removed from the area. Bill was aware of the issue and indicated the remaining culverts would be removed once the ground froze and access with heavy machinery was possible.

4.7 KM63 Bridge

As with the previously mentioned bridges, the KM63 bridge was reinforced with sea cans to improve the stability of the bridge and Tote Road. No structural integrity concerns, or concerns related to erosion were noted at the KM63 bridge. The two culverts immediately south of the bridge were perched on the west side. However, as the main flow is directed under the bridge, it was determined that this would not affect fish passage. Bill informed the Inspectors that DFO had recently inspected the culverts and agreed that the perching of the culverts was not of concern. Downstream of the culverts minor erosion was observed on the north side of the channel. Remedial rock work was evident immediately downstream of the culvert but did not extend to the area where erosion was noted. During the time of inspection flows were low and no concerns with turbidity were noted in the area.

4.8 CV106 @ KM33

There was currently no flow through the two culverts at KM33. Bill informed the Inspectors that these culverts have likely also been damaged due to an ice lens in this location. The culverts were installed perpendicular to the Tote Road, which does not follow the natural path of flow. This has resulted in flows through the road and around the

culverts which has melted the ice lens and led to damage of the culverts. Bill told the Inspectors that CV106 is not on the list of culverts to be immediately replaced. He suggested that fish passage does not occur at the crossing and so the replacement has not been deemed an emergency. However, following the inspection, Inspectors were informed by Conor Goodard that Arctic Char have previously been observed stranded at this crossing. As a result, the Inspectors feel that the replacement of this culvert should be made a priority.

4.9 Phillips Creek Bridge @ KM17

The KM17 bridge was reinforced by burying sea cans at the approach of both side, which will hopefully help improve the stability of the bridge and Tote Road. No concerns were noted at this location.

4.10 Milne Port

The final stop on the inspection was Mile Port. The two ponds (East and West) were inspected. Baffinland informed the Inspectors that under the current water license, these ponds are no longer subject to any water quality parameter criteria and can be discharged directly into the marine environment. However, Bill informed the inspectors that Baffinland is still applying general project specifications to these ponds with the main parameter of concern being TSS. Water levels in both ponds were low during the inspection. There were no concerns about the structural integrity of the ponds.

While standing on the shore adjacent to the west pond, Inspector Andrew Jaworenko (QIA) noted debris on the shoreline northwest of the port. It is recommended that this debris be removed when access to the area is possible.

While at Milne Port, Spencer Stinson (Baffinland) provided the Inspectors a tour of the ship loading process. The Inspectors had the opportunity to climb the ship loader and observe a ship actively being loaded with iron ore material. No environmental concerns were noted during the inspection of the process.

5 Summary and Information Requests

A Scheduled Environmental Inspection of the Mary River Project Area was conducted by Chloe Robinson and Joe Cavallo from LGL and Andrew Jaworenko on behalf of QIA on September 17th and 18th, 2025. During the inspection, emphasis was placed on locations impacted by the September 2024 unprecedented rain event as well as locations of deficiencies noted during previous inspections. Overall, it was evident to the Inspectors that genuine efforts are being made to address deficiencies and improve site operations. However, some minor deficiencies remain as discussed below.

The Inspectors request the following information:

- Update on the performance of the water quality treatment measures at KM105 and whether clean out of fine sediments has been planned;
- Update on clean out of fine sediments at the rock check structures along the ditch at CV78 @ KM64;
- Update on the repairs of CV216 @ KM81;
- Update on CV106 @ KM33 and whether repairs are proposed at this location; and
- Update on dust treatment along the Tote Road.

6 Critical Recommended Actions

Recommended actions resulting from the inspection were discussed at the close out meeting between Joe Cavallo, Chloe Robinson, Andrew Jarowenko, and Bill Bowden. Current recommendations are provided in Table 1 attached to this report. A main recommendation made during the inspection is that accumulating sediment be removed from areas of accumulation. This is critical to prevent the migration of sediment further downstream during high

flow conditions. Accumulating sediment was noted at multiple locations during the inspection including upstream of the KM105 dam and at the KM64 crossing.

The other reoccurring recommendation was related to the clean-up of debris across the project site. Project debris was noted on the beach at Camp Lake, at KM 64 and on the shoreline northwest of Milne Port. Addressing this deficiency is important to ensure that debris does not migrate into surrounding habitats, where it could negatively affect wildlife and water quality.

We recommend that culvert CV106 @ KM33 be replaced due to the issues noted related to the maintenance of flows and fish passage. The new design should incorporate site specific information/conditions including geotechnical data to inform whether underlying ice lens conditions might compromise future function. As noted, this culvert supports fish-bearing habitat and as such, should be made a priority.

Multiple upgrades to crossings along the Tote Road are expected to occur in the coming months. This includes emergency works on CV216 and upgrades to the crossing at KM 87.5. It is recommended that Baffinland provides an update to QIA related to these works as they occur. As requested during the June 2025 inspection, it is also recommended that Baffinland provides QIA with a schedule of culvert replacements.

In addition to the above noted recommendations, concerns noted during previous inspections remain relevant. Erosion and sedimentation controls, including coir logs, should continue to be installed around the mine site where required to prevent sedimentation into Sheardown and Camp Lake Tributaries. The effectiveness of the treatment train at KM 105, and of dust suppression methods along the Tote Road should also continue to be monitored.

7 Conclusion

The Inspectors feel that overall, the inspection was very positive. Progress has been made on many long-standing issues, and only minor concerns were noted. Inspectors urge Baffinland to continue working in the right direction to ensure site operations are in compliance with project commitments.

Should you wish to discuss any aspects of this letter, please feel free to contact either of the undersigned.

Respectfully submitted,

LGL LIMITED

Chloe Robinson, M.Sc.
Biologist

Joseph Cavallo
Senior Biologist

Table 1. LGL Limited

LGL Limited – Ecological Review of the Mary River Project				
Item No.	**Project Location**	**Description of Concern**	**QIA Requested Action**	**Has the Concern Been Addressed Based on Previous Recommendations (Bold terms are updates from September 2025)**
1	Crusher pad and water/oil separator fuel berm	Totes were not labelled properly and located in an unknown liquid.	• Totes should be labelled to reflect the liquid contained. • Totes and fuel drums should not be sitting in unknown liquid. The liquid should be removed and disposed of following proper protocols.	**Concern addressed as of September 2025 inspection. The totes have been labelled indicating they contain wastewater. Standing water is wastewater being batch treated as a part of the oil water separation process.**
2	New sediment treatment approach prior to Sheardown Tributary and fish bearing waters.	Baffinland has provided an updated approach for treating sediment upstream of Sheardown Tributary. In essence, KM105 Dam has been abandoned, and a treatment train approach has been established upstream.	• Continue to monitor the efficacy of the new approach, which is described in the June 2025 Memo. • Provide an update on the flow structure at the final discharge point. • Baffinland should have a plan in place for future spring freshets of higher intensity.	**Treatment train approach appears to be working well.** Plans for weir structure have not been provided. Unclear if a plan is in place for higher intensity spring freshets.
3	Water crossings on the project area	Replacement of culverts. Baffinland stated a schedule of culvert replacements would be produced based on priority.	• Provide QIA with a schedule of culvert replacements.	**Bill provided updates as we progressed through the inspection.**
4	Ditches along the Mine Haul Road	The informal ditches are collecting road and hillslope runoff and is flowing downstream unchecked	• The ditches should be reconstructed and sized to convey high flows, and rock check dams should be	No action observed. **No sediment laden waters were observed during the September 2025 Inspection.**

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		and with no controls during high flow periods. Sediment-laden runoff was observed on September 11 originating from up-slope at approximately KM 106.5 running into the north ditch of the haul road.	installed per typical specifications to reduce velocities, allow for settling and to reduce erosion in the ditches. • Reduction of TSS entering KM 105 pond in upstream catchment will significantly aid in reducing treatment issues in the control pond. • The source of the sediment-laden runoff observed at approximately KM 106.5 should be assessed and remediated to prevent further sedimentation into the Haul Road ditch. We recommend effort be placed on prevention of sediment laden sources of water from entering runoff which contributes to the KM 105 pond input and placing emphasis of treatment at the source.	

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5	Throughout the project area but particularly at stream crossings	High amounts of road sediments are entering stream channels and lakes throughout the site. Rain and snowmelt events exacerbate this.	We recommend that an effective sediment and erosion plan be implemented, and that regular and post-flow event monitoring occur by qualified individuals. ESC controls such as coir logs, sediment curtains and other measures (as possible for this environment) be used liberally. Examples of locations to use these measures include: • Roadside margins to prevent and/or divert sediment-laden water from flowing towards streams and/or lakes • Areas adjacent to waterbodies to prevent sediment-laden water from entering streams and/or lakes. We suggest that sediments be controlled at the source as the first step in the treatment train of measures. A maintenance staff and program are recommended to respond to issues in a timely and effective manner. Issues should be	Yes, some stream crossings have been lined with extensive areas of angular rock. We continue to recommend more liberal use of coir logs along any of the roads, to prevent sedimentation into the streams and lakes. **Coir logs have been placed along the road behind Sailiivik Camp to reduce erosion into Sheardown Tributary. Rock revetments have also been used at several locations, to good effect.**

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			proactively addressed (i.e., prior to rain events or spring freshet).	
6	Throughout the project area but particularly along the Tote Road	Excessive amounts of dust from heavy equipment and haul trucks observed throughout the project areas, but particularly along the Tote Road have previously ben observed. Significant airborne dust was not noted during this Inspection along the tote road, due to the relatively wet conditions due to recent rain.	The mineralogical and particle size characterization conducted by LGL and MISL, determined clay minerals and K-feldspar may be the major contributors of dust generation from the Tote Road. One of the major constituents (chlorite), is relatively hydrophobic and may not respond effectively to water-based dust suppression techniques. LGL recommends BIM uses the knowledge generated from this effort to further explore dust suppression techniques with the highest performance efficacy on clay minerals and K-feldspar. We understand through discussion with BIM that they have worked with specialty companies such as Veolia in the past. We encourage that the results of the Tote Road analysis be shared, and the most effective and safe product be trialled.	No effective dust suppression action observed. **In locations where calcium chloride was applied there was notable declines in dust. However, this was not applied regularly throughout the project area.**

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			We also suggest the following as an interim measure, until a suitable product with efficacy greater than water can be determined: • Regular schedule of water trucks to continually spray the road surface to discourage any mobilization of dust (depending on time of year). • Increase the number of water trucks available at any given time. • An effective early notification system is required to alert managers when dust levels are increasing. • Regularly wash heavy equipment to remove sediments and dust. • Monitor airborne dust levels and the accumulation of dust on the tundra. • Develop a monitoring methodology for dust dispersion to determine 'hot	

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LGL Limited – Ecological Review of the Mary River Project				
Item No.	**Project Location**	**Description of Concern**	**QIA Requested Action**	**Has the Concern Been Addressed Based on Previous Recommendations (Bold terms are updates from September 2025)**
			spots' and to determine various levels of impacts. • Monitor the long-term health of tundra vegetation within an area of impact determined on the above.	
7	Immediately downstream of pond KM 105	Fine sediments (silt/clay) were observed in the areas downstream of the KM 105 dam. These sediments are believed to be a result of the dam bypass and from high sediment load events. The sediments appear to be fine silts/clays. These introduced fine sediments have the potential to change the shallow soil characteristics (nutrient balance, pH, and other edaphic characteristics) and have an altering effect on the native vegetation.	• Remediation of the KM 105 pond dam and upstream channel will minimize the amounts of fine sediments able to travel downstream. • Continue to monitor turbidity, water levels and chemical parameters in pond KM 105. • Increased ESC controls should be employed to minimize entrained sediments and encourage settling (turbidity curtains, silt fencing, filter logs, etc.) • The functionality of the water treatment system would help to effectively treat water quality	Yes, but attempts to repair KM 105 pond have been unsuccessful. KM105 is no longer part of the surface water management strategy. **No sediment or turbid water observed downstream of the KM 105 dam. The current treatment train of measures appears to be functioning as intended, however snowmelt/freshet in 2025 was of low intensity.**
8	Waste Rock Facility Water Treatment Plant at top of Mine Site	We observed the Treatment Plant at the top of the Mine Site where ferric-flocculant- lime treatment	• Continue to monitor turbidity and other chemical	Complete the leak detection investigation that was scheduled to be completed

Table 1. LGL Limited

LGL Limited – Ecological Review of the Mary River Project				
Item No.	**Project Location**	**Description of Concern**	**QIA Requested Action**	**Has the Concern Been Addressed Based on Previous Recommendations (Bold terms are updates from September 2025)**
		train was in use to mitigate low pH runoff from the mining areas. Effluent was discharged several hundred metres to the east onto the tundra. No issues were noted on the date of observation. Conditions were snow covered and the plant was not yet running. The treatment pond leakage planned to be tested in the summer of 2024 to diagnose the source of the loss of water did not occur.	parameters of effluent and ensure no exceedances. • Ensure contingency plan in the event of large quantities of runoff exceeding capability of the treatment infrastructure.	during the snow free period of 2024 or devise alternate plan to ensure that contents of SCP are not released to the environment. **No new updates following the September 2025 inspection. No leaks were observed in 2025.**
9	KM 106 Ore Stockpile (Glencore)	It was understood from BIM staff that the entire stockpile is owned by Glencore and is planned to be transported to Steensby Port upon completion. An area of fines was observed in the upper reaches of the north facing slope of the stockpile.	• A safety plan should be developed to ensure that another flow failure event is not triggered if heavy equipment is operated on the surface of the stockpile whenever the stockpile is relocated.	No further actions have been taken at this location.
10	KM 81 Stream Crossing	A road washout previous to the visit had occurred and road repairs were ongoing during the inspection.	• We suggest that the amount of fine materials in the short section of channel downstream of the culverts, and upstream of the lake, be monitored over time and that	New concern **Repairs to the Tote Road have occurred. Emergency work is scheduled to occur**

Table 1. LGL Limited

LGL Limited – Ecological Review of the Mary River Project				
Item No.	**Project Location**	**Description of Concern**	**QIA Requested Action**	**Has the Concern Been Addressed Based on Previous Recommendations (Bold terms are updates from September 2025)**
			an assessment of whether any impacts to fish habitat in Muriel Lake, has occurred.	**on the crossing within 2 weeks of the inspection. We asked that BIM provide an update to QIA once the repairs were completed at this location.**
11	SDCT-1 Tributary at KM 63	The two CSP's south of the main bridge structure are significantly perched creating a barrier to fish passage. Streambank erosion has occurred downstream of the two CSP culverts due to scour.	• Mitigate the perched condition of the CSP's to ensure free passage of fish through the structure. • Monitor the streambank erosion downstream of the culverts	**Culverts do not need to be replaced as fish passage is possible under KM 63 bridge. Remedial rock work has occurred along the streambank but does not reach the area where additional erosion was observed.**
12	KM 33 Stream Crossing/**CV106**	Recent rock revetment work was completed. Water is flowing under the recently placed rocks preventing fish passage.	• This area should be observed over time to determine whether fine materials will accumulate to a degree enough to encourage surface flows.	Concern from 2024. **We recommend that culvert CV106 @ KM33 be replaced due to the issues noted related to the maintenance of flows and fish passage. This is a fish-bearing watercourse.**

Table 1. LGL Limited

LGL Limited – Ecological Review of the Mary River Project				
Item No.	**Project Location**	**Description of Concern**	**QIA Requested Action**	**Has the Concern Been Addressed Based on Previous Recommendations (Bold terms are updates from September 2025)**
13	Milne Port	Dark coloured sediments at Milne Port have been observed since 2023. A sample of the material was collected and analyzed and reported an elevated level of iron.	• A plan to prevent these sediments from entering the nearshore area and ultimately the marine environment should be developed and implemented.	Concern from 2024. **There has been no change in operations resulting from past recommendations.**
14	Throughout the project area, specifically at KM 105 and KM 64	Significant amounts of sediment are accumulating within filter berms and check dams across the project area. This was specifically noted downstream of the second filter berm at KM 105, and within the check dams east of the Tote Road at KM64. This sediment is at risk of being flushed into nearby watercourses/habitat under high flow conditions.	• Sediment that has accumulated within check dams and filter berms should be removed regularly. • **We suggest this work be complete during frozen ground conditions, such that large equipment does not disturb natural areas/tundra. The use of vacuum truck should be considered.**	New Concern. **Clean out of the fine sediments at KM105 upstream of the dam structure is recommended.** **Fine sediments at the rock check structures along the ditch at CV78 @ KM64 were observed and should be cleaned out.**
15	Throughout the project area, specifically at KM 64, Camp Lake and on the northwest shore across from Milne Port	Debris related to project works including washed out culverts and silt curtains no longer in use was noted across the project area specifically at KM 64, Camp Lake and on the shoreline northwest of Milne Port.	• Remove debris including erosion and sedimentation controls that are no longer effective/in-use.	New Concern. **Andrew Jaworenko noted debris along the shoreline northwest of Milne Port**

Baffinland Mine Site September 2025 Environmental Investigation
APPENDIX A - PHOTOGRAPHS

Photo 1 –Waste Rock Facility Pond still frozen and covered in snow (September 17, 2025).

Photo 2 – Area of snowmelt seepage southwest of Waste Rock Stockpile(September 17, 2025).

Baffinland Mine Site September 2025 Environmental Investigation
APPENDIX A - PHOTOGRAPHS

Photo 3 – Low water levels in KM 106 pond (September 17, 2025).

Photo 4 – Former drainage gully north of the KM106 pond (September 17, 2025).

Baffinland Mine Site September 2025 Environmental Investigation
APPENDIX A - PHOTOGRAPHS

Photo 5 –Partially frozen conditions at KM105 pond (September 17, 2025).

Photo 6 – Accumulation of sediment downstream of second filter berm at KM105 pond (September 17, 2025).

Baffinland Mine Site September 2025 Environmental Investigation
APPENDIX A - PHOTOGRAPHS

Photo 7 –Geotube infrastructure in place but not in use downstream of KM105 dam (September 17, 2025).

Photo 8 – Clear water downstream of KM105 dam. Area of upwelling present in the left corner of photo (September 17, 2025).

Baffinland Mine Site September 2025 Environmental Investigation
APPENDIX A - PHOTOGRAPHS

Photo 9 –Silt curtain in place at polishing pond downstream of KM105 dam (September 17, 2025).

Photo 10 – Final discharge point and location of proposed weir structure downstream of KM105 (September 17, 2025).

Baffinland Mine Site September 2025 Environmental Investigation
APPENDIX A - PHOTOGRAPHS

Photo 11 – Clear water in Sheardown Tributary (September 17, 2025).

Photo 12 – Clear water at the convergence of Sheardown Tributary and Sheardown Lake (September 17, 2025).

Baffinland Mine Site September 2025 Environmental Investigation
APPENDIX A - PHOTOGRAPHS

Photo 13 – Low water levels in the Crusher Pond (September 17, 2025).

Photo 14 – Berm and ditches surrounding the Crusher Pond (September 17, 2025).

Photo 15 – Fines stockpile at the crusher pad (September 17, 2025).

Photo 16 – Bermed containment area east of the crusher pond (September 17, 2025).

Photo 17 – Two totes of dust suppression product stored in shipping container (September 17, 2025).

Photo 18 – Crusher at the crusher pad (September 17, 2025).

Photo 19 – CV187 replaced in June 2025 (September 18, 2025).

Photo 20 – Area of proposed rail infrastructure southeast of CV187 (September 18, 2025).

Photo 21 – Debris on beach at Camp Lake (September 18, 2025).

Photo 22 – Gabion wall at Camp Lake (September 18, 2025).

Photo 23 – Spring berm in place at Camp Lake Tributary (September 18, 2025).

Photo 24 – Clear water in Camp Lake Tributary (September 18, 2025).

Baffinland Mine Site September 2025 Environmental Investigation
APPENDIX A - PHOTOGRAPHS

Photo 25 – Labelled totes at Oil Water Separator (September 18, 2025).

Photo 26 – Tundra where water is discharged following oil water separation process (September 18, 2025).

Photo 27 – Perched culverts at KM97 (September 18, 2025).

Photo 28 – Reinforced bridge at KM97 (September 18, 2025).

Photo 29 – CV001 at KM95 (September 18, 2025).

Photo 30 – Example of newly installed ‘Fish Crossing’ sign at KM95 (September 18, 2025).

Photo 31 – Example of dust created by truck traffic along the Tote Road (September 18, 2025).

Photo 32 – Dust at the Mine Site (September 18, 2025).

Photo 33 – Area of erosion (KM87.5) adjacent to David's Lake (September 18, 2025).

Photo 34 – Culverts to be replaced at KM87.5 (September 18, 2025).

Photo 35 – Perched culverts and erosion on embankment at KM87.5 (September 18, 2025).

Photo 36 – Davids Lake (September 18, 2025).

Photo 37 – Compressed culverts at KM216 (September 18, 2025).

Photo 38 – Compressed culverts at KM216 (September 18, 2025).

Photo 39 – Location of Tote Road relocation 30 m south of existing culverts at KM81 (September 18, 2025).

Photo 40 – Muriel Lake (June 18th, 2025).

Photo 41 –Accumulation of sediment in check dams at KM64 (September 18, 2025).

Photo 42 – Culverts at KM64 (September 18, 2025).

Baffinland Mine Site September 2025 Environmental Investigation
APPENDIX A - PHOTOGRAPHS

Photo 43 – Location of washed-out culverts at KM64 that need to be removed (September 18, 2025).

Photo 44 – Erosion on hill at KM64 showing high flow levels during September 2025 rain event (September 18, 2025).

Photo 45 – Perched culverts at KM63 bridge (September 18, 2025).

Photo 46 – Clear, flowing water at KM63 bridge (September 18, 2025).

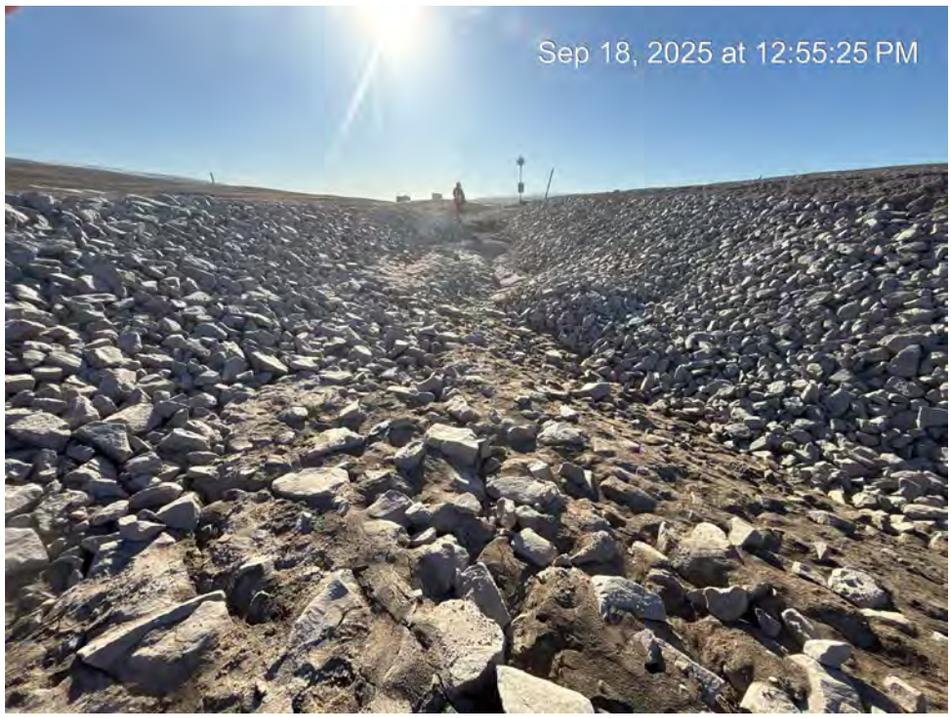

Photo 47 – Sediment accumulation but no flow in ditch upstream of culverts at KM33 (September 18, 2025).

Photo 48 – Blocked culverts at KM33 (September 18, 2025).

Photo 49 – Clear flows under KM17 bridge (September 18, 2025).

Photo 50 – Corner of buried sea can used to reinforce KM17 bridge (September 18, 2025).

Photo 51 – East stockpile discharge pond (September 18, 2025).

Photo 52 – West stockpile discharge pond (September 18, 2025).

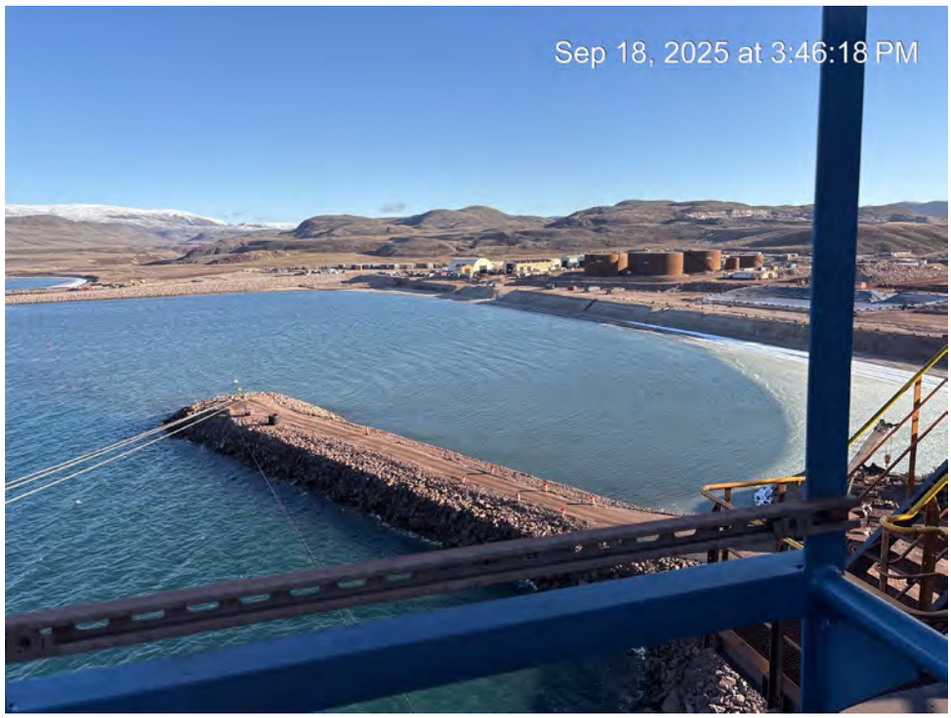

Photo 53 –View of Milne Port infrastructure from the ship loader (September 18, 2025).

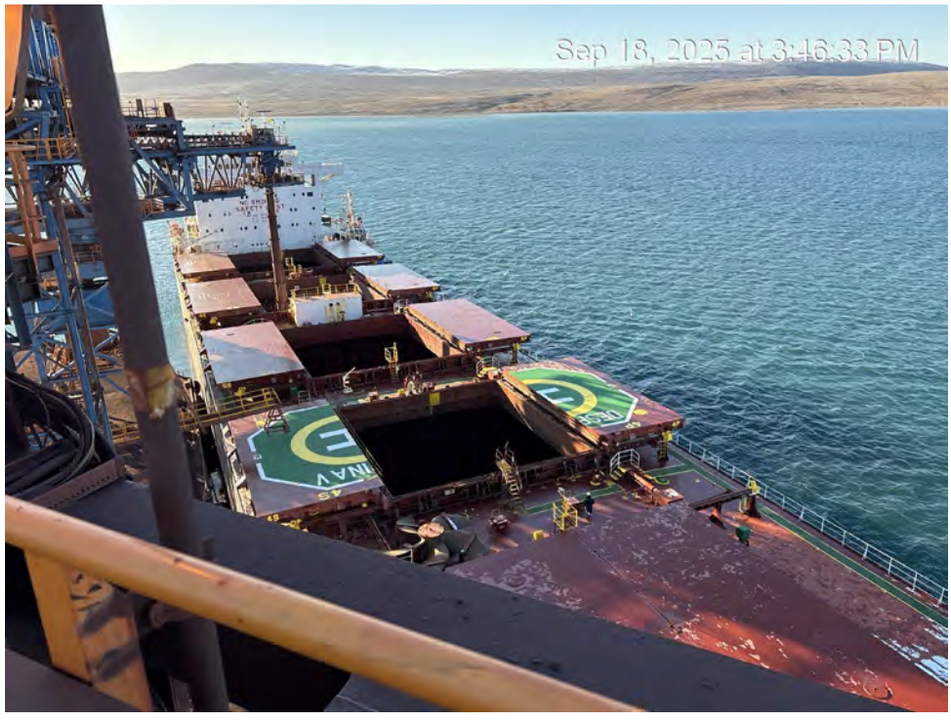

Photo 54 – View of ship loading process from the top of the ship loader (September 18, 2025).