



Water Resources Division  
Nunavut Regional Office  
Iqaluit, NU  
X0A 0H0

NWB File: 1AR-NAN1419  
CIDMS #: 1267530

November 18, 2019

Richard Dwyer  
Manager of Licensing, NWB  
P.O. Box 119  
Gjoa Haven, NU  
X0B 1J0

**Re: 1AR-NAN1419 – Crown-Indigenous Relations and Northern Affairs Canada  
Public Hearing – Final Comments with Closing Arguments for Water  
Licence Renewal/Amendment Process - Nanisivik Mine Property –  
Canzinco Ltd. - Nyrstar Canada (Holdings) Ltd.**

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Dear Mr. Dwyer,

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) is providing final comments and closing arguments of the renewal application for water licence 1AR-NAN1419 pursuant to the CIRNAC mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Crown-Indigenous Relations and Northern Affairs Act*.

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## **A. Final Comments**

CIRNAC notes that the current proposed reduction in the amount of financial security assumes that the West Twin Dike Spillway structure, which is designed to safely convey surface flow away for the tailings area downstream, will continue to function effectively as a passive system that will not require future maintenance. The next 10-year period of continued monitoring will help to validate this assumption over the long term.

CIRNAC recommends that contingency be increased to \$400,000, to cover potential maintenance and remediation work, including use of heavy equipment that may be



required to the West Twin Dike Spillway structure or any other physical structure of the former Nanisivik Mine during the 10-year term of the Amended Licence No. 1AR-NAN1419.

In addition CIRNAC is also satisfied that the buildings and equipment remaining on site are on commissionaires land and as such is the responsibility of the Government of Nunavut and not the responsibility of Nyrstar.

### **CIRNAC Security Estimate:**

Post-Closure Monitoring, 6 years @ 100,000 per year	\$600,000 (agreed)
Contingency	\$400,000
<b>Total</b>	<b>\$1,000,000</b>

CIRNAC recommends a security change from \$2,000,000 (currently held) to \$1,000,000, a reduction of \$1,000,000.

### **Closing Statement**

CIRNAC would like to take this time to thank Canzinc/Nyrstar for responding to all of our concerns and issues. Canzinc has continued to uphold the terms and conditions of its water licence and is continuing to monitor the water quality and stability of its infrastructure through its monitoring plan (water quality sampling and geotechnical inspection events (six proposed over the next ten years)

This continued monitoring shows responsibility on the part of the licensee, to the water board, the government of Canada, government of Nunavut and the territory of Nunavut.

Through this environmental responsibility shown by the licensee, the Government of Canada is willing to reduce security for the site from \$2,000,000 to \$1,000,000.

Finally CIRNAC would like to thank the NWB for facilitating the public hearing process.

Thank You