

Environmental Protection Operations Directorate  
Prairie & Northern Region  
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Yellowknife, NT X1A 2P7

ECCC File: 6600 000 064/001  
NWB File: 1BR-PLR



March 3, 2025

via email at: [licensing@nwb-oen.ca](mailto:licensing@nwb-oen.ca)

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

Dear Richard Dwyer:

**RE: 1BR-PLR – CIRNAC – Pelly Lake Remediation Project – Type B Water Licence**

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board (NWB) by CIRNAC regarding the above-mentioned type B water licence.

ECCC provides expert information and knowledge to project assessments on subjects within the department's mandate, including climate change, air quality, water quality, biodiversity, environmental emergencies preparedness and responses. This work includes reviewing proponent characterization of environmental effects and proposed mitigation measures. We provide advice to decision-makers regarding a proponent's characterization of environmental effects, the efficacy of their proposed mitigation activities, and may suggest additional mitigation measures. Any comments received from ECCC in this context does not relieve the proponent of its obligations to respect all applicable federal legislation

The following comments are provided:

**1. Post-Remediation Monitoring**

Reference(s)

- Remedial Action Plan Section 8.2, pg. 20
- Environmental Impact Assessment Section 9, pg. 61

Comment

Section 8.2 of the Remedial Action Plan states that *“a final inspection [...] will occur in the summer/fall of Year 2, following the demobilization of all waste and equipment from the Site.”* Section 9 of the Environmental Impact Assessment states *“Upon completion of the*



*project, the PCR [Project Construction Representative] will conduct post-work monitoring and ensure the disturbed areas are on a trajectory to returning to their pre-disturbance state.” However, there are no details included on the monitoring that will occur during the final inspection and post-work monitoring at the site.*

The completion of remediation activities should be validated by comparing the results of confirmatory samples to the selected remediation criteria. During and post-remediation monitoring is necessary to monitor the water quality downstream at the site to ensure that the contaminants from the impacted sediment have not mobilized into the surface water, and that the new material is stable.

ECCC Recommendation(s)

ECCC recommends the Proponent provide details on post-remediation monitoring to be included in the final inspections at the site.

If you need more information, please contact Maja Crawley at [Maja.Crawley@ec.gc.ca](mailto:Maja.Crawley@ec.gc.ca).

Sincerely,

Maja Crawley  
Environmental Assessment Officer

Attachment(s):

cc: Eva Walker, Head, Environmental Assessment North (NT and NU)