



Water Resources Division  
Resource Management Directorate  
Nunavut Regional Office  
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Your file - Votre référence  
2AM-LUP2032  
Our file - Notre référence  
GCdocs # 97287582

August 24, 2021

Mr. Richard Dwyer  
Manager of Licensing  
Nunavut Water Board  
P.O. Box 119  
Gjoa Haven, NU, X0B 1J0  
sent via e-mail: [licensing@nwb-oen.ca](mailto:licensing@nwb-oen.ca)

**Re: Crown-Indigenous Relations and Northern Affairs Canada's reply to Lupin Mines Incorporated's 4<sup>th</sup> response to comments on the Post Closure Monitoring Plan for water licence No. 2AM-LUP2032 – Lupin Mine Project**

Dear Mr. Dwyer,

Thank you for your August 17, 2021 invitation for reply to Lupin Mines Incorporated's (LMI) August 17, 2021 response to Crown-Indigenous Relations and Northern Affairs Canada's (CIRNAC) August 10, 2021 comments on the Post Closure Monitoring Plan (PCMP).

CIRNAC examined LMI responses in 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*.

In August 17, 2021 response to comment 6, LMI stated that they will carry out two and half years of active monitoring which is running concurrently with the active reclamation work and five years of passive post closure monitoring with a possibility of extension if closure objectives of physical stability and chemical stability and future use and aesthetics are not met by the end of the closure period in 2026.

CIRNAC reiterates that two and half years of active monitoring in conjunction with active reclamation activities and five years passive post closure monitoring are not adequate to confirm the site physical and chemical stability or to determine if an extended monitoring is required.

CIRNAC concern is still outstanding.



Below are CIRNAC's reply to LMI's response to CIRNAC comments:

- 1. Duration of Passive Monitoring** - CIRNAC recommended a period of 10 years active monitoring, followed by 15 years passive monitoring. However, until a minimum of five years sampling results are available no reduction in the overall period of monitoring should be contemplated.

In response, LMI has stated that active monitoring will be completed and coincide with the end of active on-site reclamation work in the same two and half year period. CIRNAC new understanding from LMI statement is that the active monitoring period will happen concurrently with two and half year active reclamation work followed by five years of passive post closure monitoring with a possibility of extension if closure objectives of physical stability and chemical stability are not met by the end of the closure period in 2026.

LMI stated that during this five year passive monitoring periods:

*"Consistent with the Care and Maintenance phase, LMI does not project a continuous manpower presence on-site during this phase".*

CIRNAC understands this to mean that during the five year passive post closure monitoring period, LMI will not have any equipment or personnel on site. They will demobilize all personnel and equipments at the end of active reclamation/active monitoring phase. Under this approach, any reclamation work done immediately prior to the end of reclamation activities and demobilization, will not be actively monitored for a minimum period of 10 years as originally proposed by CIRNAC.

CIRNAC has concerns as those reclamation activities at the end of the active closure work and active monitoring period as proposed by LMI will not be actively monitored. This approach will not alleviate the environmental risk and/or liability to the Crown.

CIRNAC still recommends that LMI carry out 10 years of active monitoring, followed by 15 years passive monitoring. However, until a minimum of five years sampling results are available, no reduction in the overall period of monitoring or quantum of security should be contemplated.

CIRNAC appreciates the opportunity to participate in this review. If there are any questions, please contact me at (867) 975-4738 or [vincent.okonkwo@canada.ca](mailto:vincent.okonkwo@canada.ca)

Sincerely,

Vincent Okonkwo  
Environment Assessment Coordinator