



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
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Your file - Votre référence
(2BE-COP1721)
Our file - Notre référence
GCDocs#101466914

March 4, 2022

Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
E-mail: licensing@nwb-oen.ca

Re: Crown-Indigenous Relations and Northern Affairs Canada's Review of the 2021 Annual Report for Tundra Copper Corp., Type B Water Licence No. 2BE-COP1721

Dear Mr. Dwyer,

Thank you for the February 2, 2022 invitation to review the referenced licence 2021 Annual Report, submitted by Tundra Copper Corp. for Type B Water Licence No. 2BE-COP1721.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the application 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*. Please find CIRNAC comments and recommendations in the attached Technical Memorandum.

If there are any questions or concerns, please contact me at (867) 975-3877 or miriame.giroux-paniloo@canada.ca and acting manager Vincent Okonkwo at vincent.okonkwo@rcaanc-cirnac.gc.ca or (867) 975-4738.

Sincerely,

Miriame Giroux-Paniloo,
Water Resource Technician



Technical Review Memorandum

Date: March 4, 2022

To: Richard Dwyer – Manager of Licensing, Nunavut Water Board

From: Miriame Giroux-Paniloo – Water Resource Technician, CIRNAC

**Subject: Crown-Indigenous Relations and Northern Affairs Canada's Review of
the 2021 Annual Report for Tundra Copper Corp., Type B Water Licence
No. 2BE-COP1721**

Region: ☒ Kitikmeot ☐ Kivalliq ☐ Qikiqtani

A. BACKGROUND

The Coppermine Project under licensee Tundra Copper Corp. is located approximately sixty (60) kilometers southwest of Kugluktuk in the Kitikmeot region of Nunavut. Kugluktukmiut Inuit have lived, hunted and relied on these lands for thousands of years. The Coppermine Project is located on Crown Land administered by CIRNAC and Inuit Owned Land (IOL) administered by the Kitikmeot Inuit Association (KIA). Tundra Copper Corp. applied for a water licence renewal in 2021 that doesn't include Inuit Owned Land (IOL) administered by the Kitikmeot Inuit Association (KIA).

The mineral exploration project was changed to an Abandonment and Reclamation Project, and was inspected by CIRNAC field inspectors in 2017. Their report came back as satisfactory. The licensee Tundra Copper Corp. requested to renew their Type B water licence in 2021 to keep it in good standing for future planned exploration across their Coppermine claims till July 20, 2026. This current review is for their 2021 Annual Report.

Project activities included exploration for copper mineralization using geochemical soil and rock sampling surveys, prospecting, 2,000 meters of core diamond drilling in five holes, 500 meters of trenching to evaluate and verify previously discovered copper deposits, and geological mappings.

CIRNAC provides the following comments and recommendations pertaining to the Type B Water Licence 2021 Annual Report 2BE-COP1721 which contains all project activities undertaken by the licensee for the year 2021.



B. DOCUMENTS REVIEWED AND REFERENCED

The following table (Table 2) provides a list of the documents reviewed under the submission and reference during the review.

Table 2: Documents Reviewed and Referenced

Document Title	Author, File No., Rev., Date
2BECOP1721 2021 Annual Report	Tundra Copper Corp., 2BE-COP1721, February 2, 2022
2BE-COP1721 Water Licence Renewal Application	Tundra Copper Corp., 2BE-COP1721, May 6, 2021
2BE-COP1721 Annual Water Use Report and Fee 2019-2020	Tundra Copper Corp., 2BE-COP1721, March 24, 2020
2BE-COP1721 Renewal Licence	Tundra Copper Corp., 2BE-COP1721, June 19, 2017
2017 KIT 013 BP N2015C0009 2BE-COP1416 TCC Kaizen Hope Lake	CIRNAC, 2BE-COP1416, August 24, 2017
2BE-COP1721 CIRNAC Comment To NWB On Tundra Copper Corp Type B Water Licence Renewal Application	CIRNAC, 2BE-COP1721, August 31, 2021



C. RESULTS OF REVIEW

1. Crown-Indigenous Relations and Northern Affairs Canada's Comment on Tundra Copper Corp. Application for Renewal of Type B Water Licence No. 2BE-COP1721

Comment:

CIRNAC was invited by the Nunavut Water Board (NWB) to review Tundra Copper Corp.'s Type B Water Licence 2BE-COP1721 renewal application and submit comments by August 12 2021. CIRNAC submitted its review with comments and recommendations on August 31 2021.

It is unclear if the licensee responded to CIRNAC comments during the renewal process as no record of their response could be found on NWB registry.

CIRNAC's concern in its review comment number R-03 during the 2021 renewal application process is resolved as the 2019 annual report requested in the comment has been found.

Recommendation:

(R-01) CIRNAC recommends that the licensee:

- Clarify whether response to CIRNAC comment during the renewal application process was provided; and
- Provide the copy of their response, if a response was issued.

2. Water Rights of Existing and Other Water Users

Comment:

Section number 18 in the Water Licence Renewal application states:

'18. WATER RIGHTS OF EXISTING AND OTHER WATER USERS

Are the effects of the undertaking on any known persons or property including those that hold licences for water use in precedence to the application, domestic users, in-stream users, authorized waste depositors, owners of property, occupiers of property, and/or holders of outfitting concessions, registered trapline holders, and holders of other rights of a similar nature, the same as those considered in the existing water licence?

X Yes ☐ No



Provide the names, addresses and nature of use for any known persons or properties that may be adversely affected by the proposed undertaking, including those that hold licenses for water use in precedent to the application, domestic users, in-stream users, authorized waste depositors, owners of property, occupiers of property, and/or holders of outfitting concessions, registered trapline holders, and holders of other rights of a similar nature.

Advise the Board if compensation has been paid and/or agreement(s) for compensation have been reached with any existing or other users.'

Tundra Copper Corp.'s response: *'There are no other users of water in the area that we are aware of. We will be in a remote area.'*

The licensee's use of the term 'remote area' as a yardstick to determine that there will not be any other users of water in the area is unfitting because Inuit travel thousands of miles to engage in hunting activities, camp and fish, and be on the land all over Nunavut. People in the closest community could be impacted irrespective of the location of the activities.

Recommendation:

(R-02) CIRNAC recommends that the licensee clarify whether the community of Kugluktuk as the closest community was duly consulted during the application for renewal process.

The 2021 Annual Report was satisfactory as the Licensee did not conduct any activity on the Coppermine site in 2021, there was no water used or waste produced.