



Environmental Protection Operations Directorate
Prairie & Northern Region
5019 52nd Street, 4th Floor
P.O. Box 2310
Yellowknife, NT X1A 2P7

June 30, 2017

ECCC File: 6100 000 072 /003
NWB File: 2BE-NAD0813

Richard Dwyer
License Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU X0B 1J0

Via email: licensing@nwb-oen.ca

**RE: 2BE-NAD0813 – Commander Resources Ltd. – Baffin Island Project – Type B
Water License Renewal and Amendment**

Attention: Richard Dwyer

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board (NWB) regarding the above-mentioned Type B Water License Renewal and Amendment. ECCC's specialist advice is provided based on our mandate, in the context of the *Canadian Environmental Protection Act*, the pollution prevention provisions of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

The following comments are provided:

1. The Environmental Management Plan provided by Commander Resources Ltd. (the Proponent) provides good information regarding the Proponent's proposed environmental mitigation measures. ECCC appreciates that the Proponent has provided specific mitigation for Species at Risk (Peregrine Falcon, Red-necked Phalarope, Short-eared Owl, Grizzly Bear, Wolverine and Transverse Lady Beetle). ECCC notes that Grizzly Bear and Transverse Lady Beetle do not occur in the Baffin Island Project area.

ECCC recommends that the Proponent add the following Species at Risk that may potentially occur in the Baffin Island Project area in section 5.2.3 of their Environmental Management Plan: Polar Bear, Ivory Gull and Red Knot.

2. In Section 5.2.4 Migratory Birds of their Environmental Management Plan, the Proponent states that the migratory bird nesting season is from mid-May to mid-August. The Baffin Island Project area migratory bird nesting season is from end of May to mid-August. The general nesting period is provided as guidance to support proponents in planning their activities. It is important to note that breeding periods may vary from year to year due to climatic conditions and some species may nest outside the dates provided if conditions are favourable.

ECCC recommends that the Proponent update section 5.2.4 to reflect the correct migratory bird season.

Should you require further information, please do not hesitate to contact me at (867) 669-4746 or Gabriel.Bernard-Lacaille@canada.ca.

Sincerely,



Gabriel Bernard-Lacaille
Environmental Assessment Coordinator

cc: Melissa Pinto, Senior Environmental Assessment Coordinator
Georgina Williston, Head, Environmental Assessment North (NT and NU)
Robert Cameron, Commander Resources Ltd.