Fisheries and Oceans Canada | Pêches et Océans Canada

Fish and Fish Habitat Protection Program
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October 14, 2026

Your file *Votre référence*
3BM-PON2025

Subject: **Municipality of Pond Inlet, Amendment Renewal Application, File Number 3BM-PON2025**

To whom it may concern,

On September 22, 2026, the Nunavut Water Board (NWB) invited parties to comment on the Municipality of Pond Inlet, Amendment Renewal Application, File Number 3BM-PON2025. The Fish and Fish Habitat Program of Fisheries and Oceans Canada (FFHPP-DFO) appreciates the opportunity to review the application and offers comments below.

DFO Comments:

The Department of Fisheries and Oceans Canada, Fish and Fish Habitat Protection Program (DFO-FFHPP) has reviewed the Municipality of Pond Inlet's Application for Water Licence Amendment, File Number 3BM-PON2025, in accordance with DFO's mandate. The documents discuss water withdrawal activities for the duration of the project which has the potential to impact fish and fish habitat.

DFO-01
Comment DFO-01:
In the documents, it is stated that the current reservoir (total volume of 120,000 m^3) is filled over an 8-week period. However, the daily allowable limit of water withdrawal from Salmon Creek is 299 m^3/day, which would only equate to a volume of 16,744 m^3 if filled over 8 weeks (56 days). Additionally, the annual allowable amount of water withdrawn from Salmon Creek is 75,000 m^3, which would be insufficient to fill the whole reservoir.

Recommendation DFO-01:
Please verify if there are additional water sources used to fill the reservoir (groundwater, runoff etc.), or if the total 120,000 m^3 is coming from Salmon Creek.
Please confirm how much water is being withdrawn per day from the Salmon Creek, over the 8-week period, in order to fill the reservoir.
Please also confirm the time of year that this 8-week withdrawal activity is taking place.

DFO-02
Comment DFO-02:
In the documents provided, it is unclear on what time of year the Salmon Creek is being used for water withdrawal and acquiring the 299 m^3/day (e.g. annually or seasonally).

Recommendation DFO-02:
Please verify if water withdrawal from Salmon Creek (limit of 299 m^3/day), is occurring year-round, or seasonally. In addition, please distinguish what amounts of water is being withdrawn from Salmon Creek and what amount is being withdrawn from the reservoir, year-round.

DFO-03
Comment DFO-03:
In the document "2025 Annual Report for the Municipality of Pond Inlet", there is a note under Table 1 that states: "*There was no water pumped from Salmon Creek to the reservoir in 2025*". It is unclear to DFO how the reservoir was filled in 2025.

Recommendation DFO-03:
Please clarify how the reservoir was filled in 2025, if the Salmon Creek was not used for water withdrawal to fill it. Are there other water sources being used? Is there groundwater that flows into the reservoir, and/or runoff that is sufficient to fill the reservoir?

DFO-04
Comment DFO-04:
In the documents, it is discussed that the volume of the reservoir will be increased from 120,000 m^3 to 207, 462 m^3 by raising the berms. In addition, this Water Licence Amendment states that there will be "*no changes to existing water withdrawal limits under this application*".

DFO Recommendation DFO-04:
Please clarify how the reservoir, with an increased volume, will be filled annually without changing the amount of water required from Salmon Creek.
Please also verify the following:

- How long will it take to fill this new volume while using Salmon Creek? (more than the current 8 weeks?) What time of year will this take place?
- How much water per day from the Salmon Creek will be required to achieve this?
- How much water annually will be required from Salmon Creek to fill the 207,462 m^3 if the annual allowable amount is currently only 75,000 m^3?

DFO-05
Comment DFO-05:
In the cover letter it is stated that "*hydrological study supports the water source availability and intake operations*", however, the document was not provided in the review package sent to regulators or the board.

Recommendation DFO-05:
Please provide the documents that support the hydrological study of Salmon Creek supporting water withdrawal limits for review.

DFO-06
Comment DFO-06:
Direct fish mortality can occur during water withdrawal activities through entrainment/impingement. Entrainment occurs when a fish is drawn into a water intake and cannot escape. Impingement occurs when a fish is held in contact with the intake screen and is unable to free itself. Excessive amounts of water withdrawn from ice-covered waterbodies can impact fish through oxygen depletion, loss of over-wintering habitat and/or reductions in littoral habitat.

Recommendation DFO-06:
In order to comply with the *Fisheries Act*, it is recommended that the Proponent follow DFO's Measures to avoid and mitigate risks to fish and fish habitat, Standards for routine projects near water, and Codes of practice for routine projects.

Proponents are also asked to respect the NU in-water works restricted activity timing windows (Projects Near Water - Nunavut Restricted Activity Timing Windows for the Protection of Fish and Fish Habitat (dfo-mpo.gc.ca) to protect fish during spawning and incubation periods when spawning fish, eggs and fry are vulnerable to disturbance or sediment.

The Proponent should refer to DFO's Interim standard for Water intake end-of-pipe fish screens.

For water withdrawal from watercourses, DFO recommends the Proponent follow the Framework for Assessing the Ecological Flow Requirements to Support Fisheries In Canada (https://waves-vagues.dfo-mpo.gc.ca/Library/348881.pdf) and demonstrates that water withdrawal rate remains <10% of actual (instantaneous) flow and does not result in flows <30% of mean annual discharge (MAD).

In addition, the proponent should follow the DFO Protocol for Winter Water Withdrawal in the NWT (2010) and not withdraw more than 10% of under-ice water volumes (Attachment 1: DFO Winter Water Withdrawal Protocol, 2010).

As of October 15, 2026, DFO will be accepting project submissions through DFO's online Project Submission Tool (Home - PST/OPP). DFO recommends that the proponent review DFO's Applicant's guide to Fisheries Act authorizations for projects near water and DFO's Risk management framework overview.: Fs23-809/2026E-PDF - Government of Canada Publications - Canada.ca to determine if a review is required for the water withdrawal aspects outlined above.

It is also the proponent's Duty to Notify DFO if they have caused, or are about to cause, the death of fish by means other than fishing and/or the harmful alteration, disruption, or the destruction of fish habitat. Such notification should be directed to DFO.ARCEMTriage-TriageGEARC.MPO@dfo-mpo.gc.ca

Yours sincerely,

Pakozdi, Sarah Digitally signed by Pakozdi, Sarah
Date: 2026.10.14 15:00:21 -07'00'

Sarah Pakozdi
Biologist
Fish and Fish Habitat Protection Program
Fisheries and Oceans Canada