Fisheries and Oceans Canada | Pêches et Océans Canada

Arctic Region
Fish and Fish Habitat Protection Program
Yellowknife, Northwest Territories
301-5204 50th Ave. (Franklin)
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Région de l'Arctique
Programme de protection du poisson et de son habitat
Yellowknife, Territoires du Nord-Ouest
301-5204 50th Ave. (Franklin)
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January 13, 2025

Our file *Notre référence*

25-HCAA-02290

Dillon Consulting Limited
Kayla Clouter
137 Chain Lake Drive Suite 100
Halifax, NS, B3S 1B3

Subject: **New Water Treatment Plant Reverse-Osmosis Reject Water Disposal & Culvert Replacement, Sanikiluaq, NU – Implementation of Measures to Avoid and Mitigate the Potential for Prohibited Effects to Fish and Fish Habitat**

Dear Kayla Clouter:

The Fish and Fish Habitat Protection Program (the Program) of Fisheries and Oceans Canada (DFO) received your proposal on January 21, 2025. We understand that you propose to:

- Install a 10 x 10 cm high-density polyethylene gravity pipeline from the brine storage tank to the discharge point (outlet channel of Sanikiluaq Lake) resulting in a loss of 13.5 m^2 of riparian vegetation above the high water mark.
- Discharge brine at a rate of 0.24 m/s during open water conditions.
- Replace the five damaged culverts located at the outlet of Sanikiluaq Lake with a pre-cast concreate box culvert (1.5 m height by 4.0 m width; embedded at 20%) with natural bottom, resulting in an alteration of 152 m^2 of fish habitat.
- Isolate the culvert construction area using cofferdams and a pump by-pass system to maintain downstream flow, resulting in a temporary loss of 290 m^2 of fish habitat. A qualified environmental professional to complete a fish salvage in the isolated area.
- Install gabion wall armouring at the culvert inlet and outlet, resulting in an alteration of 12 m^2 of fish habitat.

Our review considered the following information:

- Request for review package and associated documents, received on January 2, July 17 and November 3, 2025.
- E-mail communication between Anna-Maija LaFlamme (DFO) and Kayla Clouter (Dillon Consulting Limited) from January 21, 2025 to November 5, 2025.

- Microsoft Teams Meetings with DFO (Anna-Maija LaFlamme), Dillon Consulting Limited (Kayla Clouter, Sarah Collins, Matt Gosse, Jeff Melanson) and Government of Nunavut (Mirza Usman, Elan Chalmers, and Ryan Kum) on February 20 and September 21, 2025.

Your proposal has been reviewed to determine whether it is likely to result in:

- the death of fish by means other than fishing and the harmful alteration, disruption or destruction of fish habitat which are prohibited under subsections 34.4(1) and 35(1) of the *Fisheries Act*; and
- effects to listed aquatic species at risk, any part of their critical habitat or the residences of their individuals in a manner which is prohibited under sections 32, 33 and subsection 58(1) of the *Species at Risk Act*.

The aforementioned outcomes are prohibited unless authorized under their respective legislation and regulations.

To avoid and mitigate the potential for prohibited effects to fish and fish habitat (as listed above), we recommend implementing the measures listed below:

- Apply DFO's Measures to Protect Fish and Fish Habitat and applicable Standards and Codes of Practice.
    - Follow the Standard: In-water site isolation
    - Follow the Interim code of practice: End of pipe fish protection screens for small water intakes in freshwater, when using pumps.
- Ensure effective measures are in use during construction and operation to prevent deleterious substances (e.g. sediment, fuel oil etc.) from entering the water.
- Limit impacts on riparian vegetation to those approved for the work, undertaking or activity.
- Ensure proper sediment and erosion control during works.
- Conduct environmental monitoring during the works to demonstrate the sediment and erosion control measures are functioning as intended.
- Plan in-water works, undertakings and activities to respect timing windows to protect fish, including their eggs, juveniles, spawning adults and/or the organisms upon which they feed and migrate.

Provided that you incorporate these measures into your plans, the Program is of the view that your proposal is not likely to result in the contravention of the above mentioned prohibitions and requirements.

Should your plans change or if you have omitted some information in your proposal, further review by the Program may be required. Consult our website (http://www.dfo-mpo.gc.ca/pnw-ppe/index-eng.html) or consult with a qualified environmental consultant to determine if further review may be necessary and/or if additional measures to protect fish and fish habitat (such as sediment and erosion control measures) should be

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implemented. It remains your responsibility to remain in compliance with the *Fisheries Act*, the *Species at Risk Act* and the *Aquatic Invasive Species Regulations*.

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

It remains your responsibility to meet all other federal, territorial, provincial and municipal requirements that apply to your proposal.

We recommend that you notify this office at least 10 days before starting your project and that a copy of this letter be kept on site while the work is in progress. It remains your responsibility to meet all other federal, territorial, provincial and municipal requirements that apply to your proposal.

If you have any questions with the content of this letter, please contact Anna-Maija LaFlamme at our Yellowknife office at 867-445-3928, or by email at anna-maija.laflamme@dfo-mpo.gc.ca. Please refer to the file number referenced above when corresponding with the Program.

Yours sincerely,



Anna-Maija LaFlamme
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CC:
Tatiana Leclerc-Beaulieu (DFO)

Canada