



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
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Your file - Votre référence
7BL-AWL1722
Our file - Notre référence
GCDOCS#112745776

May 16, 2023

Robert Hunter
Licensing Administrator
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 Water Licence 2BL-AWL1722 Renewal Application submitted by Weber Arctic Expeditions for the Arctic Watch Lodge Project in the Qikiqtani Region of Nunavut

Dear Mr. Hunter,

Thank you for the May 2, 2023 invitation to review the water licence renewal application, submitted by Weber Arctic Expeditions, for its Type B Water Licence No. 2BL-AWL1722.

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 michelle.blade@rcaanc-cirnac.gc.ca or Andrew Keim at andrew.keim@rcaanc-cirnac.gc.ca.

Sincerely,

Michelle Blade,
Regional Water Coordinator



Technical Review Memorandum

Date: May 16, 2023

To: Robert Hunter, Licensing Administrator, Nunavut Water Board

From: Michelle Blade, Regional Water Coordinator, CIRNAC

Subject: **Crown-Indigenous Relations and Northern Affairs Canada's Review of the Water Licence 2BL-AWL1722 Renewal Application submitted by Weber Arctic Expeditions for the Arctic Watch Lodge Project in the Qikiqtani Region of Nunavut**

Region: ☐ Kitikmeot ☐ Kivalliq ☒ Qikiqtani

A. BACKGROUND

The Arctic Watch Lodge, owned and operated by Canadian Arctic Holding Ltd. (the Licensee or Proponent), is situated on Somerset Island, approximately eighty (80) kilometres south of Resolute Bay, in the Qikiqtani Region, Nunavut. In 2010, the NWB issued a Type "B" water licence to the Proponent of the facility to allow for the use of water and deposit of waste in support of the facility, which is used for recreational purposes. Following the expiry of this licence on June 21, 2015, the NWB issued an Approval – Without – A – Licence (No. 8WLC-AWL1015) for the Proponent to continue to use water and deposit waste in support of the facility. As the Approval Without A Licence No. 8WLC-AWL1015 expired on June 20, 2016 and the stated intentions of the Proponent is to continue operating the facility for the foreseeable future, the Licensee submitted for the Board's consideration an application to renew the Type "B" water licence. However, because the Type "B" Water Licence No. 7BL-AWL1015 was cancelled following its expiry in 2015, the Board decided to consider the renewal application as application to replace the licence. Type "B" Water Licence No. 7BL-AWL1722 was issued on August 2, 2017.

CIRNAC provides the following comments and recommendations pertaining to the assignment application. A summary of the subjects of recommendations can be found in Table 1. Documents reviewed as part of this submission can be found in Table 2 of Section B. Detailed technical review comments can be found in Section C.



Table 1: Summary of Recommendations

Recommendation Number	Subject
R-01	2019 Inspection actions required
R-02	2022 Annual Report
R-03	Water licence expired
R-04	Water flow meter
R-05	Actual daily quantity of water used
R-06	Spill contingency plan

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
Water Licence 7BL-AWL1722	Nunavut Water Board, 2 August 2017
Water Licence Renewal Application	Nansen Weber, 13 March 2023
Certificate of Incorporation	Innovation, Science and Economic Development Canada, 02 March 2020
Commercial General Liability Insurance Confirmation	EQUA, 22 July 2023
NPC Letter re 150046 Application for Water Licence Renewal	Nunavut Planning Commission, 23 April 2023
Abandonment and Restoration Plan	Weber Arctic Expeditions Ltd, 2023
Spill Contingency Plan	Arctic Watch Wilderness Lodge, July 2022
Spill Photo	unknown
Appendix A – Map for Spill Response	unknown
Technical Review of Water Licence Application (No. 7BL-AWL1015)	CIRNAC, 6 July 2017
2017 & 2018 Annual Reports technical review	Nunavut Water Board, 15 July 2019
2019 Water Licence Inspection Report	CIRNAC, 9 July 2019
Water License Application- Arctic Watch Lodge	INAC, 11 January 2009
Email	INAC, 07 April 2009
2012 Water Licence Inspection Report	INAC, 13 July 2012
2013 Water Licence Inspection Report	INAC, 12 July 2013



C. RESULTS OF REVIEW

1. 2019 Inspection actions required

Comment:

On July 9, 2019, an Inspection was conducted at Canadian Arctic Holiday's Arctic Watch Lodge at Cunningham Inlet, Somerset Island, NU. The Inspector noted water licence non-compliance with respect to: unreported spills in the ATV tent, waste disposal within 31 metres from the ordinary High Water Mark, and questionable secondary containment.

Actions required from the 2019 inspection included:

- reporting all spills as per the water licence requirements;
- storing mobile sewage storage tank not within 31 metres of any water body;
- removing bulk metal and the incinerator as those sites are no longer covered under a land use permit, and should have been removed before the expiry of the Land Use Permit; and
- calculating and articulating how the fuel cache secondary containment is able to contain a minimum of 110% of the original vessel, and 10% of the aggregate volume of all other vessels located in the containment, and/or install a proper secondary containment.

Unreported spills have also been reported during the 2012 Inspection.

Recommendation:

(R-01) CIRNAC recommends the licensee clarify how the 2019 inspection non-compliance issues and actions required have been addressed, and recommends that until such time as the requirements detailed under the inspection report are met that a renewal license is not issued by the NWB.

2. 2022 Annual Report

Comment:

CIRNAC reviewed the 2021 Annual Report. The 2022 Annual Report was not made available. The water licence expired on August 1, 2022.

Recommendation:

(R-02) CIRNAC recommends the 2022 Annual Report be made available as part of the Water Licence 2BL-AWL1722 Renewal Application, and to fulfill Part B Item 2 of the water licence.



3. Water licence expired

Comment:

Type “B” Water Licence No. 7BL-AWL1722 expired on August 1, 2022. The licensee has previously operated without a water licence.

Recommendation:

(R-03) CIRNAC recommends the licensee clarify if any activities took place on site after August 1, 2022.

4. Water flow meter

Comment:

In the 2021 Annual Report, the licensee indicated the water flow meter stopped working in 2021 and would be replaced in summer 2022.

Recommendation:

(R-04) CIRNAC recommends the licensee clarify if the water flow meter is operational, and on what date it resumed function.

5. Quantity of daily water used

Comment:

In the 2021 Annual Report, the actual quantity of water used was reported as an average in cubic metres per day. Type “B” Water Licence No. 7BL-AWL1722 permits a quantity of water not to exceed 5 cubic metres per day.

Recommendation:

(R-05) CIRNAC recommends the licensee specify if the actual quantity of water used exceeded 5 cubic metres on any day, and if so the water licence renewal application be adjusted to that volume. Furthermore, CIRNAC recommends that any and all outstanding water use fees be paid prior to the issuance of any renewal water license.

6. Spill contingency plan

Comment:

Section 12.0 of the 2023 Spill Contingency Plan states “disposal of soil/substrate or sorbent materials are bagged and shipped to Resolute for disposal.” The plan does not indicate



where onsite the impacted materials are stored, and with what secondary containment, until transported offsite.

Recommendation:

(R-06) CIRNAC recommends the licensee clarify where materials impacted by a spill will be temporarily stored onsite, and with what secondary containment, until they are transported offsite.