

Appendix I

Compliance Plan - Follow Up on 2017 Inspection Report

Year: 2017

Reference A. INAC, Water Licence Inspection Report dated June 24th, 2017.

A. Inspection

The Indigenous and Northern Affairs Canada (INAC) Inspectors conducted a water licence inspection of CFS Alert on June 24th, 2017.

B. Purpose

This Compliance Plan is an action required under Section 3 of Reference A to provide details on how the DND will come into compliance to the observed water use, erosion and sediment control, hazardous waste, and notifications to the NWB.

C. Background

The CFS Alert infrastructure is designed with a freshwater water intake and distribution system from Dumbell Lake. Fresh water is continuously looped in order to prevent pipes freezing during the winter months. CFS Alert is undergoing a water licence renewal process under 8AC-ALT---- to increase the water usage limit to reflect the actual intake water usage amount.

D. Existing Site Challenges

Due to the remote and isolated location, all shipment and procurement processes for CFS Alert takes about 2-3 years from planning to delivery, and another year (summer) for implementation. The Federal Government Contracting Policies also require additional time (1-2 years) to establish research studies and the procurement of goods and services. With these timelines in mind, DND is committed to take action but requests the understanding of the NWB and other stakeholders.

E. Situation

Upper Dumbell Lake

Due to the water used for recirculation, as of the date of the inspection, CFS Alert is above the allowable daily limit for the expired water licence 3BC-ALT1015.

Sediment Erosion Control

INAC identified significant erosion behind the pump house at upper Dumbell Lake.

Obtaining a Valid Water Licence

CFS Alert is currently using more water than permitted by their water licence 3BC-ALT1015 due to the need to circulate water to prevent pipes from freezing. DND has submitted an application for a type "A" licence to permit more water usage.

F. Actions Required / To Be Taken:

1. DND is committed to compliance with the NWB's licence for CFS Alert. As such, DND is commissioning a sediment erosion and water drainage study for CFS Alert within the next 5 years. The intent of this study is to create a Sediment and Erosion Control Plan for CFS Alert to prevent erosion and manage/mitigate sediment entry into waters, in line with the expectations of the INAC Inspector. DND is planning to commission a physical science study of Upper Dumbell Lake over the next 5 years to understand the drinking water source. DND is working closely with Defence Construction Canada to investigate road culverts and procedures to reduce the sediment impact of our operations.
2. Due to staff shortages and change in key personnel and roles in DND in fiscal year 2016 and 2017, there were unanticipated delays in responses from DND to the NWB and INAC (including ECCC). With ongoing efforts and new personnel, DND is committed to re-establish and maintain communication networks between the NWB and INAC to foster inter-departmental cooperation and team work with the management and implementation of CFS Alert's new water licence.
3. DND is committed to the renewal licence process for CFS Alert and is currently in the process of obtaining a valid NWB Licence. DND is very committed to compliance with the *Nunavut Waters and Nunavut Surface Rights Tribunal Act (2002)*, Section 11.