



Fisheries and
Oceans Canada

Pêches et
Océans Canada

Small Craft Harbours
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September 12, 2025

NWB File: 8BC-ABH2125

Nunavut Water Board
Attn: Robert Hunter
P.O. Box 119
Gjoa Haven, NU X0B 1J0

Re: Fisheries and Oceans Canada – Small Craft Harbours Arctic Bay Harbour Development – NWB Type B License Renewal Response to Screening Comments

Dear Robert Hunter,

On August 29, 2025 Fisheries and Oceans Canada – Small Craft Harbours (DFO-SCH) received a summary of comments from parties interested in the Arctic Bay Harbour Development project (the Project) currently under a public screening process completed by NWB. Parties including, regulators, non-government organizations (NGO's), stakeholders, and the public were provided an opportunity to comment on the Project. The comment period closed on August 28, 2025 and subsequently the comments were collated and summarized by NWB for DFO-SCH to address. DFO-SCH was provided an opportunity to respond to the comments by September 12, 2025.

DFO-SCH are pleased to address the comments collected through the NWB screening process. Attached is a summary table of DFO-SCH's responses to the screening comments provided by NWB.

If you have any questions with the content of this letter, please contact Deirdre Connell at 905-975-8523 or by email at Deirdre.Connell@dfo-mpo.gc.ca.

Yours sincerely,

Eleanor McEwan, P. Eng.
Senior Project Engineer
Small Craft Harbours Branch
Fisheries and Oceans Canada

cc. Kenton Thiessen (Public Services and Procurement Canada)
Chris Meisl (Advisian)



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Commenter	Comment and Recommendation	Response											
<p>Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)</p>	<p>CIRNAC understands that the scope of Type B Water Licence No. 8BC-ABH2125 is primarily related to watercourse training or diversions of small water courses, along with the construction/installation of ditches and culverts. No consumptive water use or permanent waste disposal is authorized under this Licence. The Licensee noted that specific details, such as water requirements for the construction phase, will be provided in a subsequent application made upon hiring of a contractor.</p> <p>CIRNAC is seeking clarification on the scope of construction activities in the proposed renewal for 8BC-ABH2125. There are provisions for construction activities in Part E of the Licence, and CIRNAC interprets that these provisions are applicable to the construction/installation of ditches and culverts to support water diversion activities. CIRNAC understands that the construction of other works associated with the development of the SCH would be reflected in a subsequent application. It appears that no construction activities have been undertaken to date, based on information in the 2021-2024 Annual Reports.</p> <p>CIRNAC is also seeking clarification on the Licensee's intention to amend Type B Water Licence No. 8BC-ABH2125 before commencing construction activities. Table 2-1 in the Construction Environmental Management Plan (CEMP) appears to suggest there may be a separate Type B Water Licence held by the contractor, which is shown below for reference:</p> <p>Table 2-1 List of potential permitting requirements from the Project (pg. 19 of the CEMP).</p> <table border="1" data-bbox="357 902 1870 1149"> <thead> <tr> <th data-bbox="368 902 666 993">Regulatory/Authorizing Authority</th> <th data-bbox="677 902 1123 993">Construction Activity</th> <th data-bbox="1134 902 1489 993">Required Authorization/ Permit/Approval</th> <th data-bbox="1499 902 1860 993">Permit Holder</th> </tr> </thead> <tbody> <tr> <td data-bbox="368 1000 666 1091" rowspan="2">Nunavut Water Board (NWB)</td> <td data-bbox="677 1000 1123 1091">Potential for withdrawal of freshwater or the need to cross freshwater crossings for haul road construction.</td> <td data-bbox="1134 1000 1489 1091">Type B Water Licence</td> <td data-bbox="1499 1000 1860 1091">Contractor</td> </tr> <tr> <td data-bbox="677 1097 1123 1149">Potential for diversion of small drainage ditch within SCH Footprint.</td> <td data-bbox="1134 1097 1489 1149">Type B Water Licence</td> <td data-bbox="1499 1097 1860 1149">DFO-SCH</td> </tr> </tbody> </table> <p>Recommendation:</p> <ul style="list-style-type: none"> • Clarify the scope of works and activities associated with the renewal application, including whether construction activities are being contemplated. • Confirm if the contractor will be seeking a separate Type B Water Licence. 	Regulatory/Authorizing Authority	Construction Activity	Required Authorization/ Permit/Approval	Permit Holder	Nunavut Water Board (NWB)	Potential for withdrawal of freshwater or the need to cross freshwater crossings for haul road construction.	Type B Water Licence	Contractor	Potential for diversion of small drainage ditch within SCH Footprint.	Type B Water Licence	DFO-SCH	<p>As the project was delayed during the tendering process, this renewal is an administrative timeline update, the scope of the project has not changed since the original application and no construction work has taken place to date.</p> <p>DFO-SCH acknowledges CIRNAC's concerns regarding the Contractor's Type B Water Licence. If an amendment or new permit is required, which will be determined upon contract award, the project team will deal with it directly with NWB to amend or obtain a new permit.</p>
Regulatory/Authorizing Authority	Construction Activity	Required Authorization/ Permit/Approval	Permit Holder										
Nunavut Water Board (NWB)	Potential for withdrawal of freshwater or the need to cross freshwater crossings for haul road construction.	Type B Water Licence	Contractor										
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<p>Environment and Climate Change Canada (ECCC)</p>	<p>ECCC notes that the proponent states that a disposal at sea permit is in place for the project however the permit is only valid until 2026. If dredging and disposal at sea are still required and or planned for this project a current DAS permit is required for the duration of the project.</p> <p>Permit Application Status – Arctic Bay Harbour</p>	<p>DFO-SCH is currently working with François Marchand, Senior Program Scientist, Marine Program, Environmental Protection Operations Directorate, Quebec and Arctic,</p>											



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	<ul style="list-style-type: none"> • A new ocean disposal permit application is currently open and under review, treated as a new application (received July 2024). <p>For this application to be considered complete, the following elements are required:</p> <ul style="list-style-type: none"> • Submission of a fully completed application form with all necessary information; • Payment of the applicable application fees; • Publication of a public notice in a manner that reaches the affected community. <p>Supporting Studies</p> <ul style="list-style-type: none"> • Dredged material characterization is valid for five years. The dredged material characterization must be no older than five years. • An environmental impact assessment is also valid for five years and may be reused for subsequent permit applications during that time. A review of the assessment should be done with each renewal request, to ensure that the project is the same as the original. <p>Permit Duration and Renewals Ocean disposal permits are valid for one year but may be renewed annually up to four times, provided dredging occurs each year. Thus, an initial permit may be followed by up to four renewals.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> • For further reference, please consult our website: Disposal at sea - Canada.ca. Should there be any requests or questions please contact <i>Immersion en Mer RPN / Disposal at Sea PNR (ECCC)</i> (immersionpn-disposalatseapn@ec.gc.ca) and cc ECCC Environmental Protection Operations Directorate at eanorthnu@ec.gc.ca. 	<p>Environment and Climate Change Canada to renew the existing Disposal at Sea Permit and remit the associated fees.</p> <p>Sediment re-sampling was undertaken this summer to support permit renewal.</p> <p>ECCC was supportive of the sampling plan as it was aligned with their expectations.</p>
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