



Crown-Indigenous Relations  
and Northern Affairs Canada

Relations Couronne-Autochtones  
et Affaires du Nord Canada

June 28, 2019

Your file - Votre référence  
8BC-NNF1418

Our file - Notre référence  
IQLAUT-# 1255120

Richard Dwyer  
Manager of Licensing  
Nunavut Water Board  
Gjoa Haven, NU X0E 1J0

**Re: Crown-Indigenous Relations and Northern Affairs Canada Review of Department of National Defence (DND) Water Licence renewal Application (8BC-NNF1418).**

Dear Mr. Dwyer:

Thank you for your email of June 13, 2019, concerning the above mentioned application. A memorandum is provided for the Nunavut Water Board consideration. Comments and recommendations have been provided pursuant to Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

Please do not hesitate to contact me by telephone at 867-222-9278 or email at [ian.parsons@canada.ca](mailto:ian.parsons@canada.ca) for further information.

Sincerely,

Ian Parsons  
Regional Coordinator  
Water Resources Division  
Resource Management Directorate  
Crown-Indigenous Relations and Northern Affairs Canada  
Iqaluit, NU X0A 0H0

Canada

# Technical Memorandum

**Re: Water Licence Application, #8BC-NNF1418**

Licensee: Department of National Defence (DND)  
Project: Nanisivik Naval Facility  
Region: Qikiqtani

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Comments:

**A. Background**

Since the summer of 2014 the Department of National Defence has been construction the Nanisivik Naval Facility at the former Nanisivik Mine Dock in Admiralty Inlet on Northern Baffin Island in support of the Arctic/Offshore Patrol Ships which will be commencing operations in 2020.

This facility will be used as a seasonal port and refueling station for Canadian Patrol Ships, during the open water season only, June/July - October.

During construction, there will be infrastructure to support 50-60 persons. After construction is complete most of the housing trailers will be removed leaving only accommodation and support infrastructure for a 3-5 person team.

Currently DND uses the community of Arctic infrastructure for water and wastes services.

Interested parties were asked to review this application and provide comments by June 28, 2019.

**B. Results of CIRNAC review**

The following comments and recommendations are provided:

1.	<p><b>General</b></p> <p><b>Comment:</b> The applicant states that they have been using the Hamlet of Arctic Bay community infrastructure for fresh water and waste services. They have also indicated they if there is hardship stemming from this relationship on the community's infrastructure then alternate options are available; such as using East twin lake as a potable water source.</p> <p><b>Recommendation:</b> CIRNAC would like the applicant to provide evidence that the use of the Hamlet of Arctic Bay's infrastructure is not burdening the Hamlet's resources. Such as drawing down the communities' water supply.</p>

2.	<p><b>General – Water Source</b></p> <p><b>Comment:</b> The applicant states that if they need to they can use potable water from East Twin lake, the same source that the former Nanisivik Mine used.</p> <p><b>Recommendation:</b> CIRNAC would like to know if DND has used this lake for potable water since they have been on site for a variety of reasons. (i.e. Water truck breakdown, weather, etc)</p> <p>CIRNAC would also like to know if DND completed hydrostatic testing on any of their tanks and where they sourced the water.</p>
3.	<p><b>Operation &amp; Maintenance (O&amp;M) Plan for the Naval facility</b></p> <p><b>Comment:</b> The applicant stated in their original water licence application that the O&amp;M plan will be developed by the contractor in future years.</p> <p><b>Recommendation:</b> CIRNAC reminds the licensee that unless otherwise stated in their water licence that they submit an O&amp;M plan at least 90 days prior to the startup of the facility to allow for adequate time for review and approval of the plan.</p>
4.	<p><b>Spill Contingency Plan</b></p> <p><b>Comment 1:</b> There is no clear information of an updated spill contingency plan.</p> <p><b>Recommendation:</b> CIRNAC did not find a spill contingency with the application or any reference to a previously approved plan. CIRNAC advises that the applicant provide an update to NWB on their updated spill plan.</p> <p><b>Comment 2:</b> The licensee did not indicate contaminated soil as a waste in its application.</p> <p><b>Recommendation:</b> CIRNAC would like the licensee to indicate if they have had any spills in the past 5 years and what was done to clean the spill and location where the contaminated soil/products are stored.</p>
5.	<p><b>Abandonment &amp; Restoration (A&amp;R) Plan for the Naval facility</b></p> <p><b>Comment:</b> The applicant has indicated that the contractor will be responsible for the decommissioning of the construction camp and facilities that will no longer be required once the naval facility is operational. However there is no mention of an A&amp;R Plan for the naval facility and its associated</p>

	<p>structures (i.e., tank farm, dock and all other associated structures).</p> <p><b>Recommendation:</b> CIRNAC recommends that the applicant submit a preliminary A&amp;R plan for the entire Nanisivik Naval Facility to the NWB for review and approval before the site becomes operational.</p>
6.	<p><b>Disturbance of reclamation work by Nyrstar</b></p> <p><b>Comment:</b> CIRNAC would like to indicate to DND and the NWB that there is another stakeholder in the area (Nyrstar) who currently has valid permits in the area. CIRNAC would like to remind DND to be diligent when working and or travelling in other areas outside of the immediate area of the Nanisivik Naval Facility as previous reclamation works have been completed, in order to avoid any disturbances.</p> <p><b>Recommendation:</b> CIRNAC recommends that DND communicate with the NWB and Nyrstar if they need to use East Twin Lake for potable water usage.</p>

Prepared by Ian Parsons