



Environmental Protection Operations Directorate  
Prairie & Northern Region  
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P.O. Box 2310  
Yellowknife, NT X1A 2P7

ECCC File: 6100 000 009/010  
NWB File: 8BW-LUP1924

November 14, 2024

via email at: [licensing@nwb-oen.ca](mailto:licensing@nwb-oen.ca)

Richard Dwyer  
Manager of Licensing  
Nunavut Water Board  
P.O. Box 119  
Gjoa Haven, NU X0B 1J0

Dear Richard Dwyer:

**RE: 8BW-LUP1924 – Lupin Mines Limited – Tibbet to Contwoyo Winter Road – Type B Water License Application**

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board (NWB) regarding the above-mentioned Type B Water License Application for the Tibbet to Contwoyo Winter Road.

ECCC provides expert information and knowledge to project assessments on subjects within the department's mandate, including climate change, air quality, water quality, biodiversity, environmental preparedness and emergencies. This work includes reviewing proponent characterization of environmental effects and proposed mitigation measures. We provide advice to decision-makers regarding a proponent's characterization of environmental effects, the efficacy of their proposed mitigation activities, and may suggest additional mitigation measures. Any comments received from ECCC in this context does not relieve the proponent of its obligations to respect all applicable federal legislation.

The following comments are provided:

**1. Species at Risk**

Reference(s)

- Wildlife Management Plan; Section 4.1.1.2: Species at Risk Occurring Within the Project Are

Comment:



Environment and  
Climate Change Canada

Environnement et  
Changement climatique Canada

**Canada**

The Proponent has identified Species at Risk that are likely to be present in the Project area, however are missing the Harris's Sparrow, Red-Necked Phalarope, Rusty Blackbird and the Transverse Lady Beetle.

The attached table contains a list of species that are likely to be encountered in the Project area that have been assessed as at risk by COSEWIC or listed on Schedule 1 of SARA.

ECCC Recommendation(s):

ECCC recommends NWB ensure the Proponent:

- Update their list of Species at Risk in the Wildlife Management Plan.
- Implement mitigation and monitoring measures that are consistent with applicable listed species Recovery Strategies and Action Plans or Management Plans.

Where the Proponent may encounter a listed species, the primary mitigation measure should be avoidance. ECCC recommends the Proponent:

- Submit monitoring reports to the appropriate regulators and organizations with management responsibility for that species. Monitoring should include recording the timing and location of observed listed species, their behavior when encountered, and actions taken by the Proponent to avoid disturbance to the species, its habitat, and/or its residence.

If you need more information, please contact Jennifer Sabourin at [Jennifer.Sabourin@ec.gc.ca](mailto:Jennifer.Sabourin@ec.gc.ca).

Sincerely,

Jennifer Sabourin  
Environmental Assessment Officer

cc:      Eva Walker, Head, Environmental Assessment North (NT and NU)