



## **Technical Review Memorandum**

**To:** Phyllis Beaulieu, Manager of Licensing - Nunavut Water Board

**From:** Tanya Trenholm, Pollution Policy Specialist - Indian and Northern Affairs Canada – Water Resources Division

**Re: Draft Supplemental Information Guidelines for Municipal Undertakings (DSIG or Guidelines)**

Please be advised that INAC Water Resources Division (WRD) has completed a review of the above noted Draft Guidelines for Municipal Undertakings (DSIG's). This review was conducted from the focal point of an intervener and past departmental experience, with respect to frequently requested information or recurring deficiencies in applications for Municipal water licences were considered.

As such, the following comments are offered for your consideration:

### **Recommendations / Comments**

#### **General:**

The format and content of the DSIG's was found to be extremely comprehensive and conducive to obtaining the appropriate information by way of plans, designs, and reports from the Applicant.

#### **Distribution of Completed Applications:**

Past applications have demonstrated it is not uncommon for a single review process to undergo numerous public review periods, and time-consuming exchanges of correspondence for the purposes of requesting/gathering more detailed information. As licensee, it is inherently the responsibility of the proponent to ensure a complete and comprehensive application is submitted to the Nunavut Water Board (NWB or Board). Going forward, in order to meet service level commitment with respect to turn around times for reviews, it would be helpful if only a complete application is circulated for review by the Water Board (once all associated additional information requirements have been submitted)

#### **Baseline Studies:**

INAC WRD appreciates the added value of baseline data concerning fish and fish habitat in the context of establishing appropriate water and effluent quality



criteria, as well as assessing the extent of impacts from other activities related to the undertaking. It is also recognized that on a case by case basis this information may be essential. In the interest of condensing the guidelines and maintaining a focus of expertise on mandated responsibilities for inland water quality and quantity, INAC recommends that the requirement for 'Fisheries' related information, be considered on a site specific basis only on a case by case basis.

### **Operational Plans:**

INAC recommends that all relevant operational plans be submitted and approved in advance or at least in concert with the approval of a water licence as opposed to the current practice of requiring submission of plans after the issuance of the water licence. All Plans of this nature must be prepared in accordance with accepted guidelines or otherwise in accordance with applicable best practises management documents.

Please feel free to contact me at your convenience should you wish to further discuss any part of this submission to the Board. I can be reached at 867-975-4566 or via email, [tanya.trenholm@inac.gc.ca](mailto:tanya.trenholm@inac.gc.ca).

Cc. Lou-Ann Cornacchio, Manager, Water Resources Division – Indian and Northern Affairs Canada;