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Water Resources Division
Nunavut Regional Office
Iqaluit, NU, X0A 0H0
Tel. (867) 975-4555
Email: abernethyd@inac-ainc.gc.ca

Your file - Votre référence
1BF-SOU

Our file - Notre référence
File: 9545-2-4SOUG / CIDMS 141731

April 13, 2007

Richard Dwyer
Licensing Trainee
Nunavut Water Board
Tel. (867) 360-6338
Gjoa Haven, NU X0B 1J0
Email: licensingtrainee@nunavutwaterboard.org

Sent via email

Re: 1BF-SOU / Aivitt Hunters and Trappers Association / Southampton Commercial Caribou Harvest / licence amendment

On behalf of Indian and Northern Affairs Canada (INAC) I have reviewed the request to have the Southampton Commercial Caribou Harvest licence amended to require that all organic caribou waste products be disposed of by burial. The following specialist advice has been provided pursuant to INAC's mandated responsibilities for the enforcement of the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* (NW&NSRT), *Arctic Waters Pollution Prevention Act* (AWPPA), and the *Department of Indian Affairs and Northern Development Act* (DIAND Act).

Should the Nunavut Water Board determine that all organic caribou waste products require immediate burial in the Hamlet of Coral Harbour's municipal landfill facilities, INAC recommends that a signed agreement be established between the proponent and the Hamlet for this practice. INAC continues to recommend that any leachate resulting from organic breakdown be monitored. The proponent should provide a plan on how it will manage its buried waste material in cooperation with the Hamlet if produced leachate is detrimental freshwater quality. Alternative disposal methods such as ocean disposal or allowing waste material to decompose in designated disposal areas beyond municipal boundaries, providing that the incidence of krabei tapeworms within the local fox population or brucellosis among caribou will not increase to harmful levels, should be considered to ensure that the best means of waste disposal is practiced.

Indian and Northern Affairs Canada requests notification of any changes in the proposed project, as further review may be necessary. Please do not hesitate to contact me if you have any questions or comments with regards to the foregoing.

Sincerely,

Original signed

David W. Abernethy
Regional Coordinator

Cc. Jim Rogers - Manager of Water Resources, Indian and Northern Affairs Canada, Iqaluit
Steve Pinksen - Director of Policy Planning and Legislation, Government of Nunavut's
Department of Environment, Iqaluit