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Your file - Votre référence  
1BF-SOU

Our file - Notre référence  
File: 9545-2-4SOUG / CIDMS: 125464

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*Sent via email*

**Re: 1BF-SOU - Aiviit Hunters and Trappers Organization - Southampton Commercial Caribou Harvest - licence renewal application**

On behalf of Indian and Northern Affairs Canada (INAC) I have reviewed the above-mentioned application. 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).

The Aiviit Hunters and Trappers Organization is applying for a licence renewal to support its Southampton Commercial Caribou Harvest. A temporary camp will be established on a frozen lake approximately 30 kilometres north of Coral Harbour where approximately 4,000 caribou will be processed throughout February and March. The camp will accommodate 60 project personnel and comprise of 8 cabins, a kitchen facility, an abattoir, a generator shack, outhouses, and a fuel cache. Once the allowable harvest quota has been filled and processed the camp will be completely dismantled and back hauled to Coral Harbour for storage.

Indian and Northern Affairs Canada recommends that the following comments be considered when reviewing this licence renewal application.

- The proponent shall ensure that all hazardous materials, including waste oil, receive proper treatment at an approved facility. The Spill Contingency Plan states that recovered hydrocarbons (i.e., contaminated snow and ice) will be placed in heavy plastic bags or steel drums and brought to the Coral Harbour solid waste landfill for disposal. INAC recommends that recovered hydrocarbons receive acceptable treatment, such as bioremediation at an approved landfarm facility, incineration, or other methods acceptable to the Board.
- The Spill Contingency Plan indicates that the camp's fuel cache will have a secondary containment liner. Fuel barrels will be placed on wooden pallets with a heavy plastic barrier positioned under the pallets. Upon completion of the annual harvest, the proponent will place this heavy plastic barrier in steel barrels which will be brought to the Coral Harbour solid waste landfill for disposal. INAC recommends that recovered hydrocarbons receive acceptable treatment, such as bioremediation at an approved landfarm facility, incineration, or other methods acceptable to the Board.
- Spill trays should be used when transferring fuel to minimize the possibility of having freshwater polluted by spilled hydrocarbon products.

- The December 2006 project summary states that sewage will be placed in honey bags and transferred to the Coral Harbour solid waste landfill for disposal. A December 2006 letter written by the Hamlet of Coral Harbour to the proponent specifies that sewage waste must be deposited in the sewage treatment area. INAC recommends that a signed letter of agreement between the proponent and the Hamlet of Coral Harbour delineating agreed upon disposal practices be submitted to the Nunavut Water Board.
- The proponent should explain why it feels that disposing non-salvageable caribou material at the Coral Harbour solid waste landfill is the best means of treating this waste material. Should the Nunavut Water Board permit this method of waste disposal, INAC recommends that any leachate resulting from organic breakdown be monitored. The proponent should provide a plan on how it will manage buried waste material if its leachate is detrimental to the quality of freshwater. Alternative disposal methods such as ocean disposal or allowing the waste material to decompose naturally on land beyond municipal boundaries should be considered to ensure that the best means of waste disposal is practiced.
- INAC recommends that the Nunavut Water Board consult with the Government of Nunavut's Department of Health and Social Services regarding this licence application due to its expertise in environmental health issues.

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. Peter Workman - Environmental Health Consultant, Government of Nunavut Department of Health and Social Services, Iqaluit  
 Jim Rogers - Manager of Water Resources, Indian and Northern Affairs Canada, Iqaluit