



Indigenous and
Northern Affairs Canada

Affaires autochtones
et du Nord Canada

Your file - Votre référence
3BC-AWW0814

Our file - Notre référence
IQALUIT-#1050269

April 19, 2016

Licensing Department
Nunavut Water Board
P.O. Box 119
GJOA HAVEN, NU, X0B 1J0

Sent via email: licensing@nwb-oen.ca

**Re: Technical Review of Cancellation Application – Arctic Operations Advisor course –
Department of National Defence (3BC-AWW0814)**

To Whom It May Concern,

Thank you for the Nunavut Water Board's March 29, 2016 notice of the above mentioned water licence cancellation application. A memorandum is provided for the Nunavut Water Board's consideration. Comments and recommendations have been provided pursuant to Indigenous and Northern Affairs Canada's 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 867-975-3877 or email at Amanda.Winegardner@aandc-aadnc.gc.ca for further information.

Sincerely,

Amanda Winegardner
Water Management Specialist
Water Resources Division
Resource Management Directorate
Indigenous and Northern Affairs Canada
P.O. Box 100
IQALUIT, NU X0A 0H0

Encl.

Cc. Scott Burgess, A/Manager, Water Resources - INAC, Nunavut Regional Office (NRO)
Erik Allain, Manager, Field Operations – INAC, NRO

Canada 

Memorandum

To: Licensing Department, Nunavut Water Board

From: Amanda Winegardner, Regional Coordinator, Indigenous and Northern Affairs Canada

Cc: Scott Burgess (NRO), Erik Allain (NRO)

Date: April 29, 2016

Re: Technical Review of Cancellation Application for Licence No. 3BC-AWW0814

Applicant: Department of National Defence
Project: Arctic Advisor Operations Course (formerly Advanced Winter Warfare)
Region: Qikiqtani/Kitikmeot

Comments:

A. Background

On March 29, 2016, the Nunavut Water Board (NWB) invited interested parties to review the Department of National Defence's application for the cancellation of Type B water licence 3BC-AWW0814. The Department of National Defense (the proponent) is seeking to cancel 3BC-AWW0814; the water use licence for their Arctic Operations Advisor course. The Arctic Operations Advisor course (formerly the Advanced Winter Warfare course) involves a winter training course for Canadian Forces personnel that has operated (under 3BC-AWW0814) since 2008. The course is run each winter over a period of ~14 days and operates temporary camps in locations near Arctic Bay, Cambridge Bay, Pond Inlet, Resolute, Taloyoak, Kugaaruk and Gjoa Haven (camp locations vary depending on the year). Most recent iterations of the course have occurred around Resolute.

In previous years of the course, water has been supplied from the community of Resolute in the form of ice blocks and as such, no water is drawn from water bodies at the camp locations. Waste has been frozen and transported with the course participants and then shipped to CFB Trenton for proper disposal. Greywater from the preparation of food has been cooled and returned to the land at ambient temperature. For continuing iterations of the course, the proponent has stated that water will continue to be supplied from the community of Resolute, and that all wastes generated by the course activities will be frozen, transported out with the participants and sent to a southern waste disposal facility. The proponent states that the NWB water licensing requirements do not apply to the conduct of the Arctic Operations Advisor Course.

B. Results of review

On behalf of Indigenous and Northern Affairs Canada's Water Resources Division, the following comments and recommendations are provided:

1. **Expiration of licence and submission of annual reports**

Source:

- 1) 3BC-AWW0814 New Licence
- 2) 3BC-AWW0814 Application for Cancellation Info

Comment: INAC notes that the cancellation application applies to a Type B licence which expired in 2014, however course activities have continued since 2014. INAC also notes that the proponent submitted, when requested by the NWB, annual reports for all years (2008-2014) for which the current licence was valid.

2. **Discharge of greywater from food preparation to the land**

Source:

- 1) 3BC-AWW0814 Signed Water Licence Cancellation Application
- 2) 3BC-AWW0814 2014 Annual Reporting Form
- 3) 3BC-AWW0814 2013 Annual Reporting Form

Comment: The proponent has stated in their licence cancellation application that no water is drawn from host community water bodies during the operation of the course, and that wastewater generated from the course is frozen, transported out with participants and disposed of at CFB Trenton. However, the proponent has also stated in their annual reports (including the most recent 2013 and 2014 reports) that water heated for either personal hygiene or to prepare dry food (i.e. greywater) is cooled to as close as possible to ambient temperature and released onto the land. INAC notes, though, that the proponent specifies that sewage and contaminated water are not disposed of in this way and are transported out with the course. As this licence expired in 2014 and no annual reports have been submitted since that time, it is unclear whether the course continues to operate under these guidelines (though this is assumed considering the cancellation application).

Recommendation 1: INAC recommends that the proponent consider whether the activities occurring during future iterations of the Arctic Operations Advisor course may require approval from the NWB for water use without a licence.

C. Conclusion

Indigenous and Northern Affairs Canada recommends that licence 3BC-AWW0814 be cancelled and have included a closure recommendation from a Field Operations inspector (see attached).