



NWB Tools

Richard Dwyer <richard.dwyer@nwb-oen.ca>

2AM-DOH1335 and 2BB-BOS1727 burning request

Okonkwo, Vincent <vincent.okonkwo@rcaanc-cirnac.gc.ca>

Tue, Jul 12, 2022 at 11:55 AM

To: Richard Dwyer <richard.dwyer@nwb-oen.ca>, Licensing Department <licensing@nwb-oen.ca>

Cc: "Keim, Andrew" <andrew.keim@rcaanc-cirnac.gc.ca>, "Dewar, Spencer" <Spencer.dewar@rcaanc-cirnac.gc.ca>, "Fraser, Jeremy" <jeremy.fraser@rcaanc-cirnac.gc.ca>, Ali Shaikh <ali.shaikh@nwb-oen.ca>

Hello Richard,

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the Request pursuant to its mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Crown-Indigenous Relations and Northern Affairs Act*.

Please find CIRNAC comments and recommendations below:

CIRNAC notes In section 2.2 of the Canadian Council of Ministers of the Environment, 2016 (CCME) guidance for open air burning, the pollutants of particular health and environmental concern from open air burning are listed to include:

- *PM 2.5 (Airborne particles that are 2.5 micrometers or less in aerodynamic diameter);*
- *Black carbon (soot) particles that includes aggregate of PM 2.5;*
- *Polychlorinated dibenzo dioxins (PCDDs) and Polychlorinated dibenzo furans (PCDFs);*
- *Polyaromatic hydrocarbons, including known carcinogens such as benzo(a)pyrene; and*
- *Other pollutants of concern that could be found in the smoke such as nitrogen oxides, carbon monoxide, arsenic, mercury, lead, hydrochloric acid and volatile organic compounds.*

AEM listed lead as the only contaminant of concern but in the CCME guidelines for open burning, there are bunch of other pollutants of concerns as listed above that AEM ought to have considered before reaching a conclusion that it is safer to carry out the open air burning of the woods.

Furthermore, as per 2012 Government of Nunavut, Department of Environment, document titled "Environmental Guideline for the Burning and Incineration of Solid Waste", as well as all other applicable Municipal, Territorial and Federal regulations, guidelines and Best Practice documents, only untreated wood is permitted for open burning, and all treated wood is required to be burned in a dual-chamber incinerator or disposed of at an approved landfill

CIRNAC will recommend that AEM:

- Clarify If the other pollutants of concern as listed in the CCME guidance document were considered before reaching conclusions that it is safer to carry out the open air wood burning;
- In addition to complying with the 2016 Canadian Council of Ministers of the Environment (CCME) Guidance Document for Canadian Jurisdictions on Open-Air Burning, the proponent shall comply with the 2012 Government of Nunavut, Department of Environment, document titled "Environmental Guideline for the Burning and Incineration of Solid Waste", as well as all other applicable Municipal, Territorial and Federal regulations, guidelines and Best Practice documents, when determining which materials may be permitted for open pit burning, and which materials should be sent for disposal/recycling to their appropriate facility. As per these regulations and guidelines, only untreated wood is permitted for open burning, and all treated wood is required to be burned in a dual-chamber incinerator or disposed of at an approved landfill;

- Take appropriate measures to ensure that the open air wood burning is done in a manner as to reduce its negative impact to the surrounding environment if the other pollutants of concern as listed by CCME guidance document were considered; and
- Clarify whether open air burning will be the new norm in disposing wooding material rather than offsite disposal or recycling.

Best Regards,

Vincent

From: Richard Dwyer <richard.dwyer@nwb-oen.ca>

Sent: Monday, July 4, 2022 5:06 PM

To: Ashley Mathai <ashley.mathai@agnicoeagle.com>; Nancy Duquet Harvey <nancy.harvey@agnicoeagle.com>; Guy Dufour <guy.dufour@agnicoeagle.com>

Subject: 2AM-DOH1335 and 2BB-BOS1727 burning request

Good afternoon,

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