

Environmental Protection Operations Directorate
Prairie & Northern Region
5019 52nd Street, 4th Floor
P.O. Box 2310
Yellowknife, NT X1A 2P7

ECCC File: 6100 000 043/004
NWB File: 2BE-FER1823



February 25, 2022

via email at: licensing@nwb-oen.ca

Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU X0B 1J0

Dear Richard Dwyer:

**RE: 2BE-FER1823 – Canadian North Resources Inc. – Ferguson Lake Project –
Proponent's Responses to ECCC Second Set of Comments on Water Licence
Amendment Application**

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board (NWB) regarding the above-mentioned responses.

ECCC is providing technical, science-based information and knowledge based on our mandate pursuant to the *Canadian Environmental Protection Act* and the pollution prevention provisions of the *Fisheries Act*. These comments are intended to inform the assessment of this project's potential effects in the receiving environment and on valued ecosystem components. Any comments received from ECCC in this context does not relieve the proponent of its obligations to respect all applicable federal legislation.

The following comments are provided:

1. Incinerator Ash

Reference(s)

- Spill Contingency Plan (August 2021)
- 220218 2BE-FER1823 Licensee Responses to 2nd set of Comments-IMLE

Comments:

Part of the response to ECCC-1 states that "Acceptable ash content analyses are those that do not exceed CCME guideline levels." ECCC notes that there are no CCME criteria for incinerator ash characterization, and therefore has provided further recommendations below.



ECCC Recommendation(s)

ECCC recommends that any ash sent to landfill be encapsulated unless testing results demonstrate that leachate does not contain unacceptable levels of contaminants. ECCC also recommends that waste acceptance and characterization criteria applicable to the recipient landfill(s) be incorporated into the relevant management plan(s). Such information could be obtained from the jurisdiction accepting the waste.

ECCC acknowledges all other responses provided by the Proponent, and considers the corresponding comments resolved.

If you need more information, please contact Stephinie Mallon at Stephinie.Mallon@ec.gc.ca.

Sincerely,

[original signed by]

Stephinie Mallon
Environmental Assessment Officer
Environmental Protection Operations Directorate, Prairie Northern Region

cc: Jody Small, Acting Head, Environmental Assessment North (NT and NU)
Environmental Protection Operations Directorate, Prairie Northern Region