



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

July 20, 2017

ECCC File: 6100 000 050 /006
NWB File: 2BE-HIG1217

Ida Porter
License Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU X0B 1J0

Via email: licensing@nwb-oen.ca

RE: 2BE-HIG1217– MMG Resources Inc. – High Lake Project – Type B Water License Renewal

Attention: Ida Porter

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board (NWB) regarding the above-mentioned management plan submission. ECCC's specialist advice is provided based on our mandate, in the context of the *Canadian Environmental Protection Act*, the pollution prevention provisions of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

The following comments are provided:

1. ECCC has reviewed the information provided in MMG Resources Inc.'s (the Proponent) Supplementary Information Package. This information package was supposed to contain a number of appendices which were not available to ECCC during the review period. The missing appendices include a Detailed Work History, Spill Plan, Abandonment and Restoration Plan and Waste Management Plan.

ECCC recommends that the Proponent provide all appendices for review.

2. On p.8 of the Application for Water License Renewal, the Proponent states that "Waste is collection in "pacto" toilets and incinerated on site".

Incineration of black water and sludge is discouraged unless the incinerator is specifically designed to handle this waste and the manufacturer's operating instructions are strictly followed to achieve appropriate combustion. Specifications on the incineration could not be found in the application. It is thus unclear to ECCC if the on-site incinerator will be designed to handle blackwater from the facto toilets.

ECCC recommends the Proponent clarify that the incineration equipment chosen is specifically designed to handle incineration of blackwater.

Should you require further information, please do not hesitate to contact me at (867) 669-4746 or Gabriel.Bernard-Lacaille@canada.ca.

Sincerely,



Gabriel Bernard-Lacaille
Environmental Assessment Coordinator

cc: Melissa Pinto, Senior Environmental Assessment Coordinator
Loretta Ransom, A/Head, Environmental Assessment North (NT and NU)
Theodore Muraro, MMG Resources Inc.