

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

ECCC File: 6100 000 002/012
NWB File: 2BE-IZO1823



April 24, 2023

via email at: licensing@nwb-oen.ca

Robert Hunter
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU X0B 1J0

Dear Robert Hunter:

**RE: 2BE-IZO1823 – MMG Resources – Izok Project – Type B Water Licence
Renewal/Amendment**

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board (NWB) regarding the above-mentioned Type B Water Licence Renewal/Amendment.

ECCC provides expert information and knowledge to project assessments on subjects within the department's mandate, including climate change, air quality, water quality, biodiversity, environmental preparedness and emergencies. This work includes reviewing proponent characterization of environmental effects and mitigation measures, and providing advice to decision makers on activities needed to mitigate these environmental effects. Any comments received from ECCC in this context does not relieve the proponent of its obligations to respect all applicable federal legislation.

The following comment is provided:

1. Open Burning and Incineration

Reference(s)

- Closure and Reclamation Plan for Exploration Operations – Izok/Hood Property (MMG Resources Inc.; December 2022)
- Technical Document for Batch Waste Incineration (Environment Canada; January 2010)



Comment

The Closure and Reclamation Plan discusses the use of incineration and open burning for on-site waste management. ECCC acknowledges that the use of open burning of appropriately segregated wastes is in accordance with guidance from the Government of Nunavut. However, ECCC discourages the practice of open burning as it can result in the release of toxic substances (e.g., dioxins/furans, mercury, heavy metals) to the environment. Controlled incineration that minimizes contaminant releases would be more protective of the environment. Although the Closure and Reclamation Plan describes an on-site incinerator, the plan does not indicate whether ECCC's waste incineration document has been consulted to support best practices.

ECCC Recommendation(s)

ECCC recommends the following regarding open burning and incineration:

- I. Prioritize waste management practices that minimize or eliminate the use of open burning to the extent practicable; and
- II. Consult ECCC's publication "[Technical Document for Batch Waste Incineration](#)" for guidance regarding waste incineration to inform waste management practices and relevant plans.

If you need more information, please contact Eva Walker at eva.walker@ec.gc.ca.

Sincerely,

Link: [Technical document for batch waste incineration : executive summary and overview of the six-step process for batch waste incineration : En14-17/2-2010E-PDF - Government of Canada Publications - Canada.ca](#)

Eva Walker
Senior Environmental Assessment Officer

cc: Melissa Pinto, Acting Head, Environmental Assessment North (NT and NU)