

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

ECCC File: 6100 000 062/002  
NWB File: 2BE-MLL1722



March 7, 2023

via email at: [licensing@nwb-oen.ca](mailto: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-MLL1722 – Sabina Gold and Silver – Wishbone Malley Project – Type B Water Licence Renewal**

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.

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. Open Burning**

Reference(s)

- Sabina Gold & Silver Wishbone-Malley Water Licence Renewal Application, item 15 'Quantity and Quality of Waste Involved'
- ECCC Solid Waste Management for Northern and Remote Communities, Planning and Technical Guidance Document, March 2017, available at <http://www.ec.gc.ca/gdd-mw/default.asp?lang=En&n=97182135-1>
- Government of Nunavut Environmental Guideline for the Burning and Incineration of Solid Waste



### Comment

ECCC acknowledges that Sabina Gold & Silver's plan for open burning of appropriately segregated untreated wood and cardboard is in accordance with guidance from the Government of Nunavut. However, ECCC guidelines discourage the use of open burning.

### ECCC Recommendation(s)

ECCC recommends that the Proponent investigate waste disposal practices that minimize or eliminate the use of open burning to the extent practical given the location context of the project.

If you need more information, please contact Eva Walker at (867) 444-0394 or [eva.walker@ec.gc.ca](mailto:eva.walker@ec.gc.ca).

Sincerely,

A handwritten signature in black ink, appearing to read 'E Walker', with a long horizontal flourish extending to the right.

Eva Walker  
Senior Environmental Assessment Officer

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