

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

ECCC File: 6200 000 025/007
NWB File: 3AM-CHE----



May 12, 2023

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: 3AM-CHE---- – Hamlet of Chesterfield Inlet – Type A Water Licence Application,
Proponent Response Letter to Recommendations**

Environment and Climate Change Canada (ECCC) has reviewed the Proponent responses submitted to the Nunavut Water Board (NWB) regarding the above-mentioned Type A Water Licence Application.

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 comments are provided:

1. Clarification for Open Burning Procedures

References

- Licence Condition, Part D, D-8, Plan for Compliance, Licence No. 3BM-CHE1523
- Licence Condition, Part D, D-9, Plan for Compliance, Licence No. 3BM-CHE1523
- Response Letter to Recommendations, Municipality of Chesterfield Inlet, Renewal and Amendment Application
- 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>)



- Table 2. Waste That Can be Burned or Incinerated, Government of Nunavut Environmental Guideline for the Burning and Incineration of Solid Waste (available at https://www.gov.nu.ca/sites/default/files/guideline_-_burning_and_incineration_of_solid_waste_2012.pdf)

Comment

ECCC guidelines, as represented in the ECCC Solid Waste Management for Northern and Remote Communities, Planning and Technical Guidance Document, March 2017, discourages the use of open burning.

The Government of Nunavut guidelines, as represented in Table 2 of the Environmental Guideline for the Burning and Incineration of Solid Waste, restricts open burning to paper products, cardboard, untreated wood, and natural fiber textiles only.

Row D-8 in the Plan for Compliance lists several items that shall not be subject to open burning; but, it is unclear from the description given, if they are consistent with the Government of Nunavut guidelines.

Row D-9 in the Plan for Compliance states that the "Licensee shall provide a minimum of ten (10) days' notice to an Inspector, of the intent to open burn municipal Waste." The actual timing of burning needs to consider meteorological factors such as presence of precipitation, wind speed, and wind direction. This is detailed in Section 5.2 of the Operation & Maintenance Plan for Chesterfield Inlet Municipal Water Licence: Solid Waste Disposal Facilities.

The Response Letter to Recommendations states the Proponent "can confirm that appropriate meteorological conditions will be met for open burning procedures to be implemented," which addresses ECCC's comment on row D-9, but does not address ECCC's comment on row D-8.

ECCC Recommendation

ECCC recommends that the Proponent investigate alternative waste disposal practices, which minimize or eliminate the use of open burning to the extent practical. If open burning cannot be avoided, ECCC requests confirmation that it will be limited to paper products, cardboard, untreated wood, and natural fiber textiles only.

ECCC considers all other comments as having been addressed by the Proponent's responses. If you need more information, please contact Stephinie Mallon at Stephinie.Mallon@ec.gc.ca.

Sincerely,



Andrea McLandress
Regional Director – Prairie & Northern Region

cc:

Melissa Pinto, Acting Head – Environmental Assessment North (NT and NU), Environmental
Protection Operations Directorate