

INAC STATEMENT FOR IQALUIT WATER LICENCE PRE-HEARING
SEPTEMBER 3, 2004

General statement

On behalf of Indian and Northern Affairs Canada, I would like to thank the Proponent and the many other parties involved in yesterday's technical discussion. During this discussion, INAC became aware that several outstanding issues have not, or are in the process, of being addressed by the Proponent. INAC supports the Proponents efforts in addressing these issues, and are confident that the information provided will advance our understanding of current outstanding issues.

To address timing of public hearing

INAC supports the Proponent in their Water Licence application, and at this time we do not have any significant objections to the content of application. It is our understanding, however, that several studies and plans are currently in progress, and that others will be initiated in the very near future. While presently absent from the application, the information contained in this outstanding body of work is integral to the Proponent's application. We therefore suggest that the Public Hearings be delayed a few months, in order that these current works and conceptual plans be developed and/or completed. As a result of this delay, the increased information available to all parties will make the final hearing more comprehensive and productive. We wish to be clear that any postponement of the Public Hearing should not delay the continued design and tendering of the Waste Water Treatment Plant, and we are in agreement with the Plant conceptual designs.

To identify additional information needs prior to public hearing

INAC respectfully suggests that the following materials be submitted by the Proponent and reviewed by interested parties prior to proceeding to a Public Hearing:

- 1) The Proponent is requested to ensure that all sections of the Water Licence application and Supplementary Application form for Municipalities are completed, and that the application is changed to represent the 5-year term of Licence now requested.

- 2) While INAC appreciates that significant advancement towards a new Waste Water Treatment Plant has been made, we request that you provide a conceptual framework for lagoon and sewage management, including:
 - a. A WWTP sludge management plan
 - b. A contingency plan, should the WWTP plant miss its commissioning deadline
 - c. A framework that encompasses the operation and maintenance of the existing sewage lagoon over the next 3-5 years
 - d. A discussion of the use of the existing lagoon as a component of a contingency strategy, should there be a failure of the new WWTP. This should include a description of the proposed lagoon A&R plan.
- 3) The Proponent is requested to submit new WWTP designs and details as they become available
- 4) The Dillon report on landfill drainage and leachate, and options for the management, be submitted once completed.
- 5) The new O&M manual for the solid waste facility. It is our understanding, based on discussion yesterday, that the revised O&M manual will include:
 - a. The general operation procedures for the site, including decreased cell sizes and increased compaction rates
 - b. A spill response plan
 - c. The management of metals and hazardous materials
 - d. Surface and groundwater management, including monitoring and collection and treatment, if required
 - e. Capping material management
 - f. Dispersion control, including bird and wildlife management
 - g. The use of the expansion of the landfill, in particular for emergency uses
 - h. Recycling
 - i. Training

Other comments/recommendations

With respect to Lake Geraldine and water supply, we cannot identify any additional information that would be required in advance of the Public Hearings. We would recommend, however, that during the upcoming feasibility and related studies, the Proponent review Item 10 from our technical questions of August 27, 2004, and ensure that these points are incorporated. If the feasibility study should indicate that the raising of the dam is a probable option, a Hydrological Impact of Dam Failure study associated with this option should be undertaken.

Opinion on North 40 and water licence application needs

During yesterday's discussion, INAC requested clarification of the activities occurring at the North 40 and its relationship to this application. The City was unable to provide details at the meeting and committed to clarifying this request. With the understanding that this information was forthcoming, the Nunavut Water Board requested recommendations from all parties at today's Pre-hearing on what the approach should be if there are any water use and/or waste deposition activities identified on site.

INAC is of the opinion that if there are activities occurring at the North 40 site that require a water licence then a separate application should be filed. By having two separate applications, both projects can be dealt with in a timely manner through the NWB licencing process. If the North 40 is incorporated into the current application, INAC is of the opinion that the review of the application will be significantly delayed in order that information gaps be filled. INAC does not wish to stall or delay the application review process unnecessarily as it is not in the best interest to the City or its residents.

If a separate application is decided, we would recommend that the City file the application and include those items identified in current enforcement actions - for example the abandonment and reclamation plan- and any other information that may be identified by the NWB.

INAC has been engaged in discussions with the City to resolve the issues at the North 40 and, although difficult and challenging at times, we will continue to actively seek appropriate and timely resolution.

Closing remark

INAC would like to again reiterate that our request for the Public Hearing to be delayed until required material can be submitted in no way represents disagreement with, or a lack of faith in, the Proponents current application. Rather, we are of the opinion that following the review of the above information, all parties will benefit from a more informed Public Hearing and discussion process.