



ᓄᓇᓴᑦ ᐃᓕᓂᓴᑦ ᑲᓂᓕᓴᑦ
NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

File No.: **3AM-IQA0612 /**
Renewal –Amendment

August 10, 2015

Muhamud Hassan, Chief Administrative Officer
Engineering Department
City of Iqaluit
Box 460, Iqaluit, NU X0A 0H0

Email: m.hassan@city.iqaluit.nu.ca
P.Clow@city.iqaluit.nu.ca
M.Hamp@city.iqaluit.nu.ca

**Re: 3AM-IQA0612 (Previously Licence No. 3AM-IQA0611), Type “A”; Amendment
Renewal Application by the City of Iqaluit for a Municipal Undertaking**

Dear Mr. Hassan:

Further to the Nunavut Water Board (the NWB or the Board) May 28, 2015 correspondence¹ in which the NWB invited interested parties or persons to provide technical review comments on the Type “A” water licence application (the Application) submitted by the City of Iqaluit (the City) to amend and renew Licence No. 3AM-IQA0612 (Previously Licence No. 3AM-IQA0611), the NWB received submissions² from three (3) intervening parties: Aboriginal Affairs and Northern Development Canada (AANDC), the Department of Fisheries and Ocean (DFO) Canada, and Environment Canada (EC). Copies of interveners’ submissions received in respect of the Application are attached for your attention.

The NWB has reviewed the submissions provided by the intervening parties and determined that the nature of the issues identified are such that they would require addressing before the Board can proceed to the next stage of the licensing process for the Application. Accordingly, the NWB informally sought feedback from the City with respect to the anticipated timeline by which the City intends to address interveners’ concerns; however, in its response through email³, the

¹ Letter from B. Kogvik, A/Executive Director, NWB, to M. Hassan, Chief Administrative Officer, City of Iqaluit, Re: Licence No. 3AM-IQA0612; Type “A” -Notice of Renewal-Amendment Application and Commencement of Technical Review Period for City of Iqaluit Municipal Water Licence, May 28, 2015.

² Aboriginal Affairs and Northern Development Canada (AANDC) July 2015; Department of Fisheries and Ocean (DFO) Canada; July 10, 2015, and Environment Canada (EC), July 10, 2015.

³Email from P. Clow, City of Iqaluit, to S. Joseph, NWB, Cc’d., M. Hamp, City of Iqaluit, Re: City of Iqaluit Response to Comment Period - Water Licence 3AM-IQA0611

City indicated that it is planning on addressing interveners' concerns by November 15, 2015, which the Board believes is unfortunate.

While the NWB is mindful that there might be competing projects concurrently undertaken by the City as well as the recent changes in personnel employed with the City, whom provided technical support for the Application, the Board, nevertheless, has serious concerns about potential delays that could be unintentionally imposed on the licensing process for the Application because of the timeline proposed by the City for addressing interveners' concerns.

As the City is aware, its existing Licence was issued on May 15, 2006 and set to expire on May 15, 2011; however, shortly before the Licence expired, the City applied for an emergency amendment. The Board granted the emergency amendment on May 13, 2011, which was subsequently approved⁴ by the Minister on June 17, 2011. The amendment extended the expiry date of the licence by 14 months, to June 15, 2012, with the expectation that the City would complete the renewal process for its water licence during that timeframe. The City submitted a partially complete application to renew its Licence on October 12, 2012. However, due to several factors including delays in pre-licensing processes, submitting and exchanging information, and addressing deficient or outstanding requirements, the renewal process for Licence, which typically takes approximately one (1) year on average for a Type "A" Water Licence Application, remains ongoing to date for this Application.

To ensure that the remaining stage(s) of the licensing process for the Application is brought to completion in a somewhat timely manner, the Board recommends that the City reconsider amending the timeline proposed for addressing interveners' concerns to a much earlier date. In so doing, potential delays for the next stage of the licensing process and ultimately the remaining stages of the renewal process, for an already expired licence, is expected to be reduced by at least three (3) months. Further, addressing interveners' concerns sooner rather than later will ensure that the necessary information required to proceed to the next stage of the licensing process for the Application is available for review, in accordance with section 48 (2)⁵.

If you would like to discuss any matters related to your Application or have questions regarding procedural matters related to the Application, please direct them to Phyllis Beaulieu, Manager of Licensing, or Robin Ikkutisluk, Licensing Administrator, by phone at (867) 360-6338 or by e-mail to licensing@nwb-oen.ca. Inquiries related to technical matters, should be directed to Sean Joseph, Technical Advisor, by email to sean.joseph@nwb-oen.ca, or David Hohnstein, Director of Technical Services, by e-mail to david.hohnstein@nwb-oen.ca.

Yours sincerely,

Robin Ikkutisluk
A/Manager of Licensing
Nunavut Water Board

Cc: Qikiqtani Distribution List, Paul Clow, Mathew Hamp

⁴ Letter from J. Duncan, PC, MP, to T. Kabloona, Chairperson, NWB, June 17, 2011.

⁵ Section 48 (2) of the Act states that, except in the case of cancellation, an Application needs to be accompanied by the information and studies concerning the use of waters or the deposit of waste that are required for the Board to evaluate the qualitative and quantitative effects of the use of water or the deposit of waste on waters,