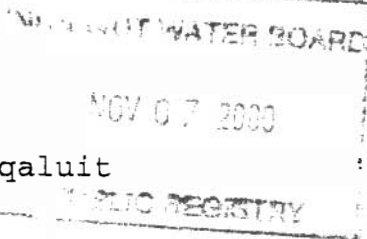


NUNAVUT WATER BOARD	
Date:	23/11/2000
Exhibit No.:	13

October 5, 2000

Submission to the Nunavut Water Board

Re: Application for Renewal, Municipality of Iqaluit



The Municipality of Iqaluit has requested a multi-year extension to its existing Water License.

Although the Municipality has over the last year begun making efforts to address some of the many problems it has faced in the areas of solid waste management and sewage disposal I do not believe that sufficient progress has yet been made to grant a multi-year extension.

In the last application made to the NWB the Municipality stated that one public concern was:

"Smoke and debris from open burning"

and that the Municipality would address this issue by

"Further restricting the hours of burning, and more segregation of waste prior to burning."

This does not appear to the observer outside the Municipality to have been implemented regardless of changes which may have been to the Municipal landfill operation and maintenance manual.

Under the consolidation of Environmental Rights Act "contaminant" is defined as:

"... any solid, liquid, gas, odour, heat, sound, or vibration, or any combination of them, the release of which into the environment, causes or contributes to the impairment of the quality of the environment, causes harm or material discomfort to any person, or adversely affects or impairs the health or safety of any person, or renders the environment unfit for use by any plant or animal life or by any person;"

"Environment" is defined as:

"... the components of the Earth within the Territories and includes all air, land, water, snow, and ice ..."

Under these definitions the Municipality of Iqaluit is guilty of contaminating the environment both within the community and its surrounding area.

The nature of the waste being disposed of by burning (plastics, plastic compounds, and chemicals such as found in household cleaners, detergents, drain openers, etc ...) results in the creation of dioxins and furans that are hazardous to human and animal life and the environment as a whole through the addition of Persistent Organic Pollutants to the various ecosystems. On many occasions wind has blown smoke from the landfill directly into the community creating a health hazard for all who live here.

At the time of the last application for renewal residents within the community were concerned with the various health and safety issues created by the Municipal open burn. Comments made at various stages of the public consultation process for the Solid Waste Management Plan recently completed by the Municipality indicate that the number of concerned people has increased yet since the last application there appears to have been no significant change in Municipal practices in this respect.

Further restrictions should be placed upon open burning to include:

(1) No burning during any time of the year when the wind direction could cause smoke from the landfill to move into the community

(2) No burning between the 15th of April and the 1st of October when the wind direction could cause smoke from the landfill to move over the causeway area, the North 40 recreational area, or the Sylvia Grinnell Park area.

It was stated in the previous application for renewal that a public concern was:

"Not enough recycling"

And that the Municipal action would be:

Further separation of wastes at the solid waste site and more reuse and recycling would be encouraged.

Again, over the one year period covered by the license granted by the NWB little or no evidence of these steps has been evidenced.

Abandonment and restoration of previously used landfill sites still remains an issue and little if any progress appears to be made in this area.

The landfill known generally as "the old metal dump" is a jumble of cars, trucks, heavy equipment, and other assorted metals and me

tal wastes, including at least 1 airplane body. I understand that the Municipality considers this landfill the responsibility of the Government of Canada however it was, in the past, used as a Municipal landfill as well.

The landfill previously used by the Municipality is located on the side of a bank directly across the inlet from the community. Some attempts at covering material were previously made although remains visible on the side of the hill during the summer months and spring and rain runoff goes directly through this area into the waters of the inlet.

The old Apex landfill is located on the side of a steep hill leading directly into the ocean. To date restoration of this site has consisted of burying material on the top of the hill with rock and gravel fill and heavier material remains at the base of the hill directly in the inlet during periods of high tide.

To the best of my knowledge no studies have been commissioned regarding either the effects these landfill sites are having on the environment or the ultimate restoration or remediation of any of the sites.

Conclusion

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In the period of time since the Nunavut Water Board last reviewed an application from the Municipality for a Water License the Municipality began work on the process of determining how it can better and properly address the various solid waste management and sewage disposal issues that it faces. The progress made in these areas should be recognized, however,

(1) The sewage treatment plant that was supposed to have been brought on-line almost a year ago is still not operational and a growing population still depends on a sewage lagoon not designed for a community this size. While it is understood that the problems that have resulted in this facility not being used are those of a previous Council and previous Municipal staff members the fact remains that it was poor planning & monitoring by the Municipality of Iqaluit, and quite possibly the Government of Nunavut, that resulted in the current problems.

(2) Statements made by the Municipality in its' previous application for renewal have not, to outward appearance, been followed through on.

(3) The issue of enforcement which was brought up during the last renewal process appears to remain a grey area, although on at least

ast one occasion this summer the Municipality was ordered by the Government of Nunavut to put out the fire at the landfill as a result of public complaints.

I would state again that while the Municipality has made considerable progress in certain areas others remain at previous levels that do not promote a high level of confidence should a multi-year extension be granted by the NWB.

Additionally since the issue of which department or agency of either the Territorial or Federal levels of Government does or does not have enforcement ability in specific areas of any license issued by the NWB appears to remain uncertain confidence in the proper or acceptable regulation of a multi-year license is questionable.

Until such time as the Municipality has proven over a multi-year period of time its' willingness and capacity to address the many issues that it faces in this area as well as adhere to its' own policies, procedures, and statements in this area, and, until such time as the various departments and agencies of the Territorial & Federal levels of government clarify the issue of enforcement and demonstrate the willingness & capacity to enforce both existing legislation and any terms and conditions that may be attached to any multi-year renewal of a license by the NWB, I cannot support a license renewal of longer than 1 year during which time both of these issues can be further monitored and assessed.

Marcel Mason