From:	Ian Parsons
To:	Andrew Keim; Murray Ball; Mark Mallory
Cc:	mia.pelletier@ec.gc.ca; siu-ling.han@ec.gc.ca; Phyllis Beaulieu (licensing@nunavutwaterboard.org)
Subject:	Re: FW: 120612 3BC-PLI1217 Renewal Licence
Date:	Wednesday, June 13, 2012 12:17:22 PM

Dear Mr. Mark Mallory,

Thanks for the comments.

In response to your comments I would like to point out that it is the Nunavut Water Board (NWB) that sets water licence conditions and if there are terms in the licence that you view as objectionable and unreasonable, I would encourage you to submit alternative suggestions to the Nunavut Water Board as part of your future renewal application(s). When requested by NWB, AANDC does prepare comments for licence renewals, and it is AANDC practice to conduct a review of annual reports related to the licence as part of that process. Our comments generally reflect adherence to processes set forth in the water licence. AANDC Water Resources Division recognizes that the nature of your work poses very little risk to water in the north, and we also look forward to the adoption of the Nunavut Waters Regulations that will see your work exempted from licencing requirements in the future.

Regards,

Ian Parsons

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>>> Mark Mallory <mark.mallory@acadiau.ca> 6/13/2012 8:26 AM >>>
Hi AANDC,

We just received our renewed water licence for Prince Leopold Island and noticed a few comments from AANDC. I was going to simply deal with them this season and carry on, but then I thought I should respond to a few briefly, particularly those in your list of "deficiencies".

a) Our water licence is for 5 m3 of water use PER DAY. We have repeatedly indicated that we wouldn't use this much in an entire field season, let alone a day, month or week, as we have no bathing or shower options at this site, and we minimize our water use and conserve water to the fullest extent possible. Thus, the notion of us monitoring our water use is both trivial and silly. If you need to plunk a number in, you can put 20 L/day, which in a 60 day field season sees us use ~ 1200 L (1.2 m3), or 0.4% of what our permit allows. Even if I'm off by 100%, we still use less than 1% of what our permit allows.

b) We will add the spill line and AANDC contact numbers to the Spill Plan.
c) We will try to get a coordinate for the sump and the outhouse this season.
d) We have never had an unauthorized discharge or spill, and hence none have ever been reported in any of our annual reports – frankly this seems pretty obvious, and the format of the NWB annual report does not indicate that you should report "none" if there were none. Hence, why are you asking for this?
e) "(from your letter) *AANDC recommends that all relevant leases, permits, conformity checks and screenings as well as any other authorizations are in place and proper approvals received before any work commences. AANDC notes that the appropriate approvals from the Nunavut Planning Commission and Nunavut Impact Review Board were not received or available prior to Environment Canada submitting their renewal application*." I recognize that this is probably a cut-and-paste comment, but AANDC has ample experience with the permitting process in Nunavut, so this comment surprised me. AANDC provided an extension to our land use permit on 13 MARCH 2012 (email from John Craig re: Land Use Permit N2003J0014; hence it had NPC and NIRB approval already). **The NWB licence application went out for review on 1 MAY 2012, fully 6 weeks after AANDC had already approved our land use permit**. This is a long term site (> 30 years) with an excellent inspection record, with a host of permits that we get every year, and with community support for the project and site. Moreover, AANDC recommended to EC years ago that we take over administrative control of this site, and we sent in the information and request to do this to you, but that has been sitting with AANDC now for more than 3 years, (last checked with Brian Tattuinee on 5 October 2011) so it's actually EC that has been waiting for AANDC regarding appropriate approvals, etc., not the other way around!

f) Our minimal garbage that comes out of the site goes to NRCan Polar Continental Shelf as part of our support with them, and they deal with the Hamlet etc. for garbage, so it is not our responsibility to arrange this with the Hamlet to my knowledge.
g) We have no hazardous wastes and have never used them.

I hope this information clarifies some of the situation. We shall endeavor to fill in the other missing bits this season. I take the permit process in Nunavut seriously, so when I receive comments back on an application that are clearly incorrect, I'm afraid I feel compelled to respond.

Please advise on if/when these small projects will be exempted from water licences.

Sincerely,
Mark
cc. Mia, Siu-Ling

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