

Environmental Protection Operations Directorate  
Prairie & Northern Region  
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ECCC File: 6200 000 024/004  
NWB File: 3BM-WHA1520



January 21, 2021

via email at: [licensing@nwb-oen.ca](mailto:licensing@nwb-oen.ca)

Richard Dwyer,  
Manager Licensing  
Nunavut Water Board  
P.O. Box 119  
Gjoa Haven, NU X0B 1J0

Dear Richard Dwyer,

**RE: 3BM-WHA1520 – Hamlet of Whale Cove – Type “B” Renewal Water License  
Application – Kivalliq Region**

Environment and Climate Change Canada (ECCC) has reviewed the Type B Renewal Water License Application submitted to the Nunavut Water Board (NWB) for water license 3BM-WHA1520 by the Hamlet of Whale Cove.

ECCC’s specialist advice based on our mandate pursuant to the *Canadian Environmental Protection Act* and the pollution prevention provisions of the *Fisheries Act*.

The following comments are provided:

**1. Outstanding Information**

Reference(s):

- Plan for Compliance 2020 (Excel spreadsheet; September 25, 2020)
- Response to Annual Report Tech Review 2020 (September 25, 2020)

Comment:

The document ‘Response to Annual Report Tech Review 2020’ indicates that a number of water licence items are out of compliance, including but not limited to, the following missing information:

- Solid Waste Disposal Facilities Update Report; and



- Updated consolidated Operations and Maintenance (O&M) Manual consisting of:
  - Environmental Emergency Contingency Plan;
  - Environmental Monitoring Program & Quality Assurance/Quality Control Plan;
  - Sewage Treatment Facility Operation and Maintenance (O&M) Plan;
  - Solid Waste Management Facility Operation and Maintenance (O&M) Plan; and
  - Water Supply Facility Operation and Maintenance (O&M) Plan.

It is unclear whether the Quality Assurance/Quality Control (QA/QC) Plan has been provided as required.

The compliance plan is presented in a tabular format, listing the individual conditions of the existing water licence and identifying whether items are in compliance or non-compliance. This plan acknowledges several areas of non-compliance, and includes columns to identify a short-term and long-term plan for compliance, as well as implementation schedules for the short- and long-term plans, for each non-compliant item.

The compliance plan states the following short-term plan for each identified area of non-compliance: *"Will look into finding these documents and submit within one year after submission of the application"*.

The long-term compliance plan, and implementation schedules for the short-term and long-term plans, for each identified area of non-compliance are all stated as: *"Continue as is one new licence has been issued and parts and items have been revised by all parties"*.

ECCC notes that the proposed short- and long-term plans and associated implementation schedules do not provide sufficient detail to address items of non-compliance.

ECCC Recommendation(s):

ECCC recommends that the Hamlet of Whale Cove develop specific short-term and long-term plans and associated implementation schedules with sufficient detail to address items of non-compliance. For each area of non-compliance, identify steps to obtain the required information, provide and justify timelines, and discuss any limitations or barriers in addressing the non-compliance.

If you need more information, please contact Jennifer Sabourin at [Jennifer.Sabourin@canada.ca](mailto:Jennifer.Sabourin@canada.ca).

Sincerely,



Jennifer Sabourin, Environmental Assessment Officer  
Environmental Protection Operations Directorate, Prairie Northern Region

cc: Brian Asher, Acting Head, Environmental Assessment North (NT and NU)