



Indigenous and  
Northern Affairs Canada

Affaires autochtones  
et du Nord Canada

*Your file - Votre référence*  
7BL-AWL1015

July 6, 2017

*Our file - Notre référence*  
IQALUIT-#1157340

Licensing Department  
Nunavut Water Board  
P.O. Box 119  
GJOA HAVEN, NU, X0B 1J0

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

**Re: Technical Review of Water Licence Application (No. 7BL-AWL1015) – Arctic Watch Lodge (Canadian Arctic Holdings Ltd.)**

To Whom It May Concern,

Thank you for the Nunavut Water Board's June 2, 2017 notice of the above mentioned water licence application.

A memorandum is provided for the Nunavut Water Board's consideration. Comments and recommendations have been provided pursuant to Indigenous and Northern Affairs Canada's mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

Please do not hesitate to contact me by telephone at 867-975-3877 or email at [Amanda.Winegardner@aandc-aadnc.gc.ca](mailto:Amanda.Winegardner@aandc-aadnc.gc.ca) for further information.

Sincerely,

Amanda Winegardner  
Water Management Specialist  
Water Resources Division  
Indigenous and Northern Affairs Canada  
P.O. Box 100  
Iqaluit, NU X0A 0H0

Encl.

Cc. Ian Parsons, A/Manager, Water Resources, INAC, Nunavut Regional Office (NRO)  
Erik Allain, Manager, Field Operations, INAC, NRO

Canada 

## Memorandum

To: Licensing Department, Nunavut Water Board

From: Amanda Winegardner, Water Management Specialist, Indigenous and Northern Affairs Canada (INAC)

Cc: Ian Parsons, A/Manager, Water Resources, INAC  
Erik Allain, Manager, Field Operations, INAC

Date: July 6, 2017

**Re: Technical Review of Application No. 7BL-AWL1015 for Arctic Watch Lodge**

Applicant: Canadian Arctic Holidays Ltd. (Richard Weber)  
Project: Arctic Watch Lodge  
Region: Qikiqtani

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### Comments:

#### A. Background

Canadian Arctic Holidays Ltd. (the Licensee) has applied to renew expired Type 'B' Water Licence 7BL-AWL1015 to support the operation of the Arctic Watch Lodge (the Lodge). Water Licence 7BL-AWL1015 expired in 2015, despite continued operation of the Lodge. The licence 7BL-AWL1015 is for both water use (domestic) and deposit of waste.

Arctic Watch Lodge is located in Cunningham Inlet on Somerset Island. The nearest community to the Lodge is Resolute, approximately 90 km away. The Lodge hosts tourists for activities including hiking, sea kayaking, wildlife viewing/photography and fishing. The Lodge includes 16 guest cabins, a common lounge and interpretive centre along with outbuildings.

The Cunningham River serves as a potable water source for the camp, with an estimated maximum daily usage of 4 m<sup>3</sup> per day. Annual Reports reviewed from 2011 to 2014 report daily use of water between 2.69 and 3.23 m<sup>3</sup>. The water is obtained from the river via an electric pump, stored in a plastic tank and then gravity fed to buildings throughout the camp. Greywater is filtered through an on-land weeping bed. Sewage is contained in a lagoon and sump. The sewage system has been in operation for 16 years and the greywater system for five years.

The Licensee has requested a Water Licence term of 25 years.

## B. Results of review

On behalf of INAC's Water Resources Division, the following comments and recommendations are provided for the NWB's consideration:

### 1. **Expiration of Water Licence**

#### **Source:**

- 1) 7BL-AWL1015 New Licence

**Comment:** INAC notes that Water Licence 7BL-AWL1015 expired in 2015.

**Recommendation 1:** INAC notes that the Licensee has indicated that operations have continued at the lodge despite the licence having expired. INAC reminds the Licensee that operations involving water use and/or deposit of waste are not authorized without a valid Water Licence (except under certain emergency provisions). In the future, INAC recommends submitting the appropriate documentation to the NWB well in advance to ensure that the situation of operating with an expired licence does not happen.

### 2. **Water use**

#### **Source:**

- 1) 7BL-AWL1015 New Licence
- 2) 7BL-AWL1015, Section 13: Quantity and Quality of Water Involved

**Comment:** Water Licence 7BL-AWL1015 authorizes daily water use of up to 5 m<sup>3</sup>.

**Recommendation 2:** While estimated daily water use in the Water Licence Application is 4 m<sup>3</sup>, INAC recommends that the issued Water Licence authorize use of 5 m<sup>3</sup> per day in order to provide some extra leeway for the Licensee.

### 3. **Waste generated**

#### **Source:**

- 1) 7BL-AWL1015 Renewal Application, Section 15: 'Quantity and Quality of Waste Involved'

**Comment:** The Licensee's Water Licence Application only mentions black and greywater as wastes produced by operation of the Lodge. There is no mention of whether other types of waste (e.g. food waste, waste oil, batteries etc.) are produced and if so, how they are managed to protect nearby bodies of water.

**Recommendation 3:** INAC recommends that the Licensee advise whether there are

additional waste streams to consider at the Lodge and if so, what the disposal procedures are for these other types of waste.

#### **4. Annual reports**

**Source:**

- 1) Annual Report directory on public registry

**Comment:** INAC notes that annual reports have been filed and are available on the NWB's public registry from years 2011 to 2014. No annual reports are available for 2015 and 2016.

**Recommendation 4:** INAC recommends that the Licensee submit annual reports for 2015 and 2016. The Licensee is reminded that reporting requirements are still valid, even under an expired Water Licence.

**Recommendation 5:** INAC reminds the Licensee that they are required to submit annual reports to the NWB under a renewed Water Licence, even during years that the Lodge is not operational.

#### **5. Spill Contingency Plan**

**Source:**

- 1) 7BL-AWL1015 Spill Plan 2012 revised

**Comment:** The Licensee's Spill Contingency Plan (SCP) appears to have been last updated in 2012 or 2013. At least one contact name for INAC is outdated.

**Recommendation 6:** INAC recommends that the Licensee remove Melissa Joy's name from the contact information chart as she is no longer a Water Resource Officer with INAC.

**Recommendation 7:** INAC recommends that the Licensee review their SCP yearly to ensure that it is kept up to date.

#### **6. Water Licence term**

**Source:**

- 1) 7BL-AWL1015 Renewal Application, Section 25: 'Proposed Term of Licence'

**Comment:** The Licensee has requested a Water Licence term of 25 years, through to 2042.

**Recommendation 8:** INAC has no issues with a Water Licence term of 25 years. INAC

reminds the Licensee that significant changes in operation may occur at a camp over a 25-year period and that they will be responsible for applying for an amendment should their needs change in terms of water use or deposit of waste.