Environmental Protection Operations Directorate Prairie & Northern Region 5019 52nd Street, 4th Floor P.O. Box 2310 Yellowknife, NT X1A 2P7

ECCC File: 6930 000 042/001 NWB File: 7BL-AWL1722



May 31, 2023

via email at: licensing@nwb-oen.ca

Robert Hunter
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU X0B 1J0

Dear Robert Hunter:

RE: 7BL-AWL1722 – Weber Arctic Expeditions – Arctic Watch Lodge – Water Licence Renewal

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board (NWB) regarding the above-mentioned Water Licence Renewal Application.

ECCC provides expert information and knowledge to project assessments on subjects within the department's mandate, including climate change, air quality, water quality, biodiversity, environmental preparedness and emergencies. This work includes reviewing proponent characterization of environmental effects and mitigation measures, and providing advice to decision makers on activities needed to mitigate these environmental effects. Any comments received from ECCC in this context does not relieve the proponent of its obligations to respect all applicable federal legislation.

The following comments are provided:

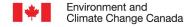
1. Topic: Contingency for spills on/near water

Reference(s)

Spill Contingency Plan (Arctic Watch Wilderness Lodge; July 2022)

Comment

Section 11.0 "Initial Action - Measures to address spills" of the Spill Contingency Plan states that oil, gas or diesel are not transported onto water or ice, and therefore the Plan does not describe measures for containment and clean up on water or ice. It is not clear how fuel is transported to camp without stream crossings (if fuel is flown in - map included in Appendix





A shows streams between the lodge and airstrip) or if work is very near shore (if fuel is shipped in).

In addition, ECCC notes that appendices B through G of the Spill Contingency Plan have not been included.

ECCC Recommendation(s)

ECCC recommends the Proponent:

- Clarify how the camp is refuelled without transporting fuel across streams or near shore.
 If it is necessary to move fuel across water or on ice, the Spill Contingency Plan should be modified to include actions to address spills in water or on ice, and appropriate equipment should be available on site;
- Provide appendices B to G of the Spill Contingency Plan.

2. Topic: Waste management

Reference(s)

- Application for water licence renewal (Weber Arctic Expeditions Ltd.; March 13, 2023)
- 7BL-AWL1722 Arctic Watch NWB annual report 2021 (Weber Arctic Expeditions Ltd.; 2022)
- 7BL-AWL1722 Arctic Watch NWB annual report 2022 (Weber Arctic Expeditions Ltd.; 2023)
- 7BL-AWL1722 Spill Photo (Weber Arctic Expeditions Ltd.; 2023)
- Weber Arctic Expeditions response to CIRNAC Review Licence 2BL-AWL1722
 Renewal Application for the Arctic Watch Lodge Project in the Qikiqtani Region of
 Nunavut (Weber Arctic Expeditions Ltd.; May 17, 2023)
- Spill Contingency Plan (Arctic Watch Wilderness Lodge; July 2022)

Comment

The only type of waste generated identified in box 14 of the application is greywater, however other information references other waste, including sewage. Both the 2021 and 2022 annual reports detail waste shipped to Yellowknife including household garbage, glass, waste oil, scrap metal and other types. Sewage is described in box 15 of the application, "Toilets are marine toilets and disposed in latrine pits approved and inspected by the GN", the Spill Photo provided with the application identifies a "Black water pit", and the Response to CIRNAC review refers to a mobile sewage storage tank.

ECCC Recommendation(s)

ECCC recommends the Proponent:

 Identify all waste generated at the camp to help regulators develop appropriate licence conditions;

- Provide more detail on how sewage is disposed of, including a description of proximity to surface waters and a copy of the Government of Nunavut approval for latrine pits;
- Update the Spill Contingency Plan to include responses to sewage spills, including from the mobile sewage storage tank.

If you need more information, please contact Anna Graham at Anna.Graham@ec.gc.ca.

Sincerely,

[original signed by]

Anna Graham
Environmental Assessment Officer

cc: Melissa Pinto, Acting Head, Environmental Assessment North (NT and NU)