



Environment and  
Climate Change Canada

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Environmental Protection Operations Directorate  
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ECCC File: 6100 000 185 /001  
NIRB File: 17EN059

Natasha Lear  
Environmental Administrator  
Nunavut Impact Review Board  
P.O. Box 1360  
Cambridge Bay, NU X0B 0C0

Via email: [info@nirb.ca](mailto:info@nirb.ca)

**RE: 17EN059 – Transitions Metals Corporation – Arcadia Bay Project – NIRB Screening**

Attention: Natasha Lear

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Impact Review Board (NIRB) regarding the above-mentioned screening. ECCC's specialist advice is provided based on our mandate, in the context of the *Canadian Environmental Protection Act*, the pollution prevention provisions of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

The following comment is provided:

On p.12 of their Environmental Management Plan, under Section 6 Waste Management Planning, Transition Metals Corporation (the Proponent) states that "Alternatively to outhouses, a pacto system will be used and waste incinerated".

Incineration of black water and sludge is discouraged unless the incinerator is specifically designed to handle this waste and the manufacturer's operating instructions are strictly followed to achieve appropriate combustion. On p.10 of the Environmental Management Plan, in the section on Air and Noise Quality, the Proponent states that it will use an "Environment Canada approved batch waste, controlled air, dual chamber incinerator [...]", but no specifications on whether the incinerator is able to handle sewage are provided. It is thus unclear to ECCC if the on-site incinerator will be designed to handle blackwater from the pacto toilets.

ECCC recommends the Proponent clarify that the incineration equipment chosen is specifically designed to handle incineration of blackwater.

Should you require further information, please do not hesitate to contact me at (867) 669-4746 or [Gabriel.Bernard-Lacaille@canada.ca](mailto:Gabriel.Bernard-Lacaille@canada.ca).

Sincerely,



Gabriel Bernard-Lacaille  
Environmental Assessment Coordinator

cc: Melissa Pinto, Senior Environmental Assessment Coordinator  
Loretta Ransom, A/Head, Environmental Assessment North (NT and NU)  
Thomas Hart, Transitions Metals Corporation