



**INDEPENDENT ENVIRONMENTAL MONITORING AGENCY**

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Kathy Racher  
Chair of Working Group 3  
Wek'eezhii Land and Water Board  
#1 4905—48<sup>th</sup> Street  
Yellowknife NT  
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Dear Kathy

**Re: Comments on Draft Water and Effluent Quality Management Policy**

The Agency submits the following comments on the draft Water and Effluent Quality Management Policy. We would like to compliment the Boards for the plain language version of the introduction and the Frequently Asked Questions as a good way to try to engage communities.

The policy is a reasonable first step but the true value will depend on how, and how quickly, the work described in Appendix A is undertaken. The real substance will be in the guidance documents which are yet to come. We appreciate the work to date but encourage the Boards to proceed with finalizing these documents quickly.

The guiding principles outlined in the draft appear sound. The use of a site-specific water quality standards approach seems reasonable given the arguments presented in the previous work by INAC in "Toward the Development of Northern water Standards: Review and Evaluation of Approaches for Managing Water Use in Northern Canada".

The term 'amount' should be used with care as it can refer to either the quantity or the quality of the waste. In Section 1.0, it would be preferable to change 'amount of *waste*' to 'limit on the quality of the *waste* discharged' to avoid any ambiguity. This wording would also align more closely with the term 'effluent standards' referred to in Section 14(4)(c)(ii) of the NWT waters Act. A problem also arises when 'amounts' are equated with 'loadings' in Section 7.0. If, as stated, an EQC can be a concentration or a loading, then the equating of amount and loading in this context is confusing as an amount could also be calculated by multiplying a loading X the volume of water discharged.

The types of information the Boards will use in setting water quality standards for receiving environments are listed in s. 7.2.1.2 of the draft but there is no mention of research results on northern ecosystems or northern species. For example, the Department of Fisheries and

Oceans has commissioned a series of toxicity studies on northern fish species that should prove helpful to the Boards. This section could also contain a bullet about using stakeholders and the applicant views on the limits of acceptable change and weighting of the types of information on setting water quality objectives.

Monitoring requirements are discussed in s. 8.1 and the purpose of the SNP might be expanded to include some assurance to the public of the maintenance of water quality downstream of a development. The Agency suggests that the text should also indicate the early warning system role for Aquatic Effects Monitoring Programs and that this monitoring can identify the need to manage and/or regulate other parameters later in the life of the project.

The Agency would be pleased to discuss these comments with you at your convenience.

Sincerely

A handwritten signature in black ink, appearing to read "W. A. Ross". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Bill Ross  
Chairperson

cc. Society Members  
Anne Wilson, Environment Canada  
Bruce Hanna, Fisheries and Oceans