



CIRNAC Comments to NIRB

Re: Notice of Screening for Government of Nunavut's
"Renewal and Amendment of the Municipality of Resolute Bay
Solid Waste Facility Water License #3BM-RES 2025" Project
Proposal



Nunavut Regional Office
918 Sivumugiaq Street
Iqaluit, NU, X0A 3H0

Your file - Votre référence
24XN043
Our file - Notre référence
GCdocs# 141035553

October 30, 2025

Francis Emingak
Screening Officer
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU, X0B 0C0
via NIRB public registry

Re: Notice of Screening for Government of Nunavut's "Renewal and Amendment of the Municipality of Resolute Bay Solid Waste Facility Water License #3BM-RES 2025" Project Proposal

Dear Francis Emingak,

On October 10, 2025, the Nunavut Impact Review Board (NIRB) invited parties to comment on Government of Nunavut's "Renewal and Amendment of the Municipality of Resolute Bay Solid Waste Facility Water License #3BM-RES 2025" project proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) offers the responses below as it pertains to the NIRB's request:

Any matter of importance to the Party related to the project proposal

CIRNAC #1: Spill Prevention and Contingency Planning

The proposed solid waste management facility will involve the storage and use of approximately 10,000 L of diesel fuel during construction, along with lubricants and other petroleum products for heavy equipment. The site's fractured shallow bedrock and coarse-grained soils increase the potential for rapid contaminant migration if a spill occurs. While the Environmental Emergency Contingency Plan outlines general spill response procedures, it does not describe whether site-specific conditions were used to inform the proposed mitigation measures. The development of project-specific mitigation measures for spills would minimize potential impacts on receiving environments. CIRNAC recommends that the Proponent consider:

- Developing and implementing a spill contingency plan that addresses fuel storage and transfer areas for the new facility;
- Including site-specific details, such as spill pathways, containment, and response procedures;
- Storing fuel and petroleum products with adequate secondary containment and maintaining required setbacks from waterbodies; and,



- Ensuring all personnel are trained in spill response and that spill kits are available at all fuel handling locations.

CIRNAC #2: Construction Wastewater Management

The Project anticipates up to 730 total person days on site during construction, generating greywater and sewage. If these wastes are not properly managed, they could result in localized contamination of soil and surface water. CIRNAC recommends that the Proponent consider:

- Clarifying whether a temporary camp/galley will be established or whether existing community accommodations will be used; and
- Describing measures to collect, store, and dispose of any greywater and sewage in a manner that minimizes impacts to land and water.

CIRNAC #3: Leachate Management and Climate Resilience

The proposed landfill design relies on natural attenuation and a small lined leachate pond, assuming containment by permafrost. Geotechnical investigations indicate fractured bedrock and variable overburden, and climate projections suggest warming that could affect containment performance over the facility's lifespan. CIRNAC recommends that the Proponent consider:

- Evaluating leachate management under normal and extreme climate conditions;
- Incorporating climate change considerations into design and monitoring programs; and
- Establishing adaptive measures to address potential changes in permafrost or drainage.

CIRNAC #4: Hazardous Waste Segregation and Backhaul

Operations will generate hazardous waste. The application proposes sea-can storage and periodic backhaul. However, it is unclear to CIRNAC if the secondary containment within sea-cans is adequate for preventing potential spills. Inadequate secondary containment may result in potential impacts, as sea-cans may not be leak-proof. CIRNAC recommends that the Proponent clarify if the secondary containment within sea-cans provides sufficient capacity for potential spills.

CIRNAC #5: Incineration and Residual Ash Management

The Proponent intends to continue using an incinerator through the Polar Continental Shelf Program to reduce putrescible waste. While this approach has reduced wildlife attraction, details on ash disposal protocols are not provided. CIRNAC recommends that the Proponent consider:

- Establishing protocols for ash characterization and disposal to prevent leachate contamination; and
- Clarifying roles and responsibilities for incinerator operation and ash management and reporting ash management practices, including quantities and disposal locations.

CIRNAC #6: Consultation with Interested Parties



CIRNAC recommends that the Proponent continue consulting with the Municipality of Resolute Bay and any other relevant organizations or individuals regarding the project proposal. As part of these consultation activities, several issues should be considered, including, but not limited to:

- Incorporation of Inuit Qauijimajatuqangit and Community Knowledge, in addition to scientific ways of knowing into project activities;
- Mitigation measures to prevent any disturbance to wildlife and the environment;
- Mitigation measures to prevent disturbance to sites of cultural, archaeological, and/or environmental significance;
- Training and employment opportunities for Inuit and community members;
- Procurement opportunities for local and Inuit-owned businesses;
- Planning efforts for the closure of the existing municipal solid waste facility; and,
- Regular updates on the status of project activities.

CIRNAC appreciates the opportunity to provide comments. Should you have any questions, please contact Muhammad Arslan by e-mail at muhammad.arslan@rcaanc-cirnac.gc.ca or David Abernethy by email at david.abernethy@rcaanc-cirnac.gc.ca.

Sincerely,



John MacInnis
Sr Environmental Assessment Specialist

