



NIRB File No.: 24XN043

Commission File No.: 150499

Related to Commission File Nos: 148206 and 149221

NWB Water Licence: 3BM-RES202

November 4, 2025

To: William Patch
Director, Planning & Lands
Government of Nunavut - Department of Community Services
Kugluktuk, NU
X0B 0E0

Community Support Division (Municipal Works Division)
Government of Nunavut
PO Box 700, Station 1000
Iqaluit, NU
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Sent via email: wpatch@gov.nu.ca; kwasylyshen11@gov.nu.ca; community.supportdivision@gov.nu.ca

Re: Opportunity to address comments received regarding Government of Nunavut's "Renewal and Amendment of the Municipality of Resolute Bay Solid Waste Facility Water License #3BM-RES 2025" project proposal

Dear William Patch and Community Support Division:

On August 15, 2024, the Nunavut Impact Review Board (NIRB or Board) received a referral to screen Government of Nunavut's "Renewal and Amendment of the Municipality of Resolute Bay Solid Waste Facility Water License #3BM-RES 2025" project proposal from the Nunavut Planning Commission (Commission). On October 10, 2025, the NIRB circulated a public notice of the screening for this project, inviting interested parties to provide comments directly to the NIRB by October 31, 2025.

On or before October 31, 2025, the NIRB received comments from the following interested parties:

Commenting Party	NIRB Doc ID No.
Crown-Indigenous Relations and Northern Affairs Canada	357816

Commenting Party	NIRB Doc ID No.
Environment and Canada Climate Change	357814
Transport Canada	357815

All comment submissions received by the NIRB relating to this project proposal can be accessed from the NIRB's online public registry at www.nirb.ca/project/125993.

A *summary* of the public concerns reflected in the comment submissions relate to the following:

- Insufficient information on the proposed solid waste facility's mitigation and design specifications, making it difficult to confirm that potential impacts would be adequately mitigated. Information such as the following are lacking:
 - Detailed layout of the components of the new solid waste facility to ensure environmental receptors are protected from accidents or malfunctions.
 - Information on potential monitoring wells and monitoring programs to detect any potential leachate seepage.
 - Planned specifications for various divertible waste areas or the leachate ponds including the use of geomembrane liners.
 - Minimizing precipitation infiltration such as stormwater management, snow clear and daily cover.
 - Lack of information on the mitigation measures such as secondary containment and spill kits for the 10,000 litre diesel storage container.
- Concern that the proximity of Site A to Allen Bay and Parry Channel may affect these sites by leachate seepage or the release of hazardous materials, potentially resulting in adverse effects on fish, fish habitat and surface water quality.
- Concern that the containment performance of the proposed landfill design for Site A did not consider normal and extreme climate projections.
- Information not provided on how the recommendations from the 2021 Solid Waste Management Planning Study would be integrated into the Project design.
- The Environmental Emergency Contingency Plan does not describe whether site-specific conditions were used to inform the proposed mitigation measures. Recommended the Proponent consider developing and implementing a spill contingency plan.
- Concern that the wastes (greywater and sewage) generated from personal during the construction period could result in localized contamination of soil and surface water.
- Unclear whether the secondary containment for the proposed sea-can storage holding hazardous wastes is adequate for preventing spills.
- Limited information provided on ash disposal protocols or management from the use of an incinerator through the Polar Continental Shelf Program.
- Continued consultation with the community of Resolute Bay and other relevant organizations is encouraged.

The NIRB would like to provide Government of Nunavut with an opportunity to address the comments noted above prior to the Board rendering its determination for this screening assessment and issuing its subsequent Screening Decision Report to the responsible Minister. The NIRB respectfully requests that a response be provided directly to the NIRB by **November 18, 2025**.

If Government of Nunavut determines that the time required to supply a written response is significantly greater than two (2) weeks, the Board requests written notification and an anticipated date for submission be provided as soon as possible.

Please send any forthcoming submissions directly to the NIRB at info@nirb.ca, or through the online public registry at www.nirb.ca.

If you have any questions or require additional clarification, please contact the undersigned directly at 1-866-233-3033 or femingak@nirb.ca.

Sincerely,



Francis Emingak
Screening Officer
Nunavut Impact Review Board

cc: Distribution List
Jared Ottenhof, Qikiqtani Inuit Association
Chris Spencer, Qikiqtani Inuit Association
Jutin Buller, Government of Nunavut
Sean Joseph, Government of Nunavut
Natalie D'Souza, Government of Nunavut
Randy Mercer, Government of Nunavut
Ken Wasylychen, Government of Nunavut
Adrian Paradis, Canadian Northern Economic Development Agency
John MacInnis, Crown-Indigenous Relations and Northern Affairs Canada
Muhammad Arslan, Crown-Indigenous Relations and Northern Affairs Canada
David Abernathy, Crown-Indigenous Relations and Northern Affairs Canada
Jennifer Sabourin, Environment and Climate Change Canada
José Audet-Lecouffe, Fisheries and Oceans Canada
Holly Poklitar, Transport Canada