Crown-Indigenous Relations and Northern Affairs Canada
Relations Couronne-Autochtones et Affaires du Nord Canada

CIRNAC Comments to NIRB

Re: Notice of Screening for City of Iqaluit's "Long Term Water Project (LTWP)" Proposal

Canada

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

Your file - Votre référence
25XN041
Our file - Notre référence
GCdocs# 143289384

February 4, 2026

Viren Nasit
Senior Impact Assessment Officer
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU, X0B 0C0
via NIRB public registry

Re: Notice of Screening and Comment Request for City of Iqaluit's "Long Term Water Project (LTWP)" Proposal

Dear Viren Nasit,

On January 14, 2026, the Nunavut Impact Review Board (NIRB) invited parties to comment on City of Iqaluit's "Long Term Water Project (LTWP)" proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) appreciates the opportunity to provide comments and 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: Hazardous Materials Volumes, Handling Frequency, and Spill Pathway Risk

The Project indicates substantial volumes of fuels and other hazardous liquids will be stored and handled in support of construction and operations, including ~100,000 L of diesel fuel, ~10,000 L of gasoline, ~4,554 L of oil, and ~6,000 L of diesel exhaust fluid (DEF), in addition to compressed gas cylinders (e.g., propane/oxyacetylene). Given the multi-year construction timeline and the long operational period, it is unclear how these inventories have been assessed in relation to site-specific spill likelihood and consequence, including how storage/handling locations will be finalized relative to terrain gradients, drainage pathways, and sensitive receiving environments across the broader ~1,150 ha project area. This information is required for fulsome spill mitigation planning. CIRNAC recommends that the Proponent considers:

- Clarifying how locations for hazardous materials storage, staging, and refueling will be confirmed in relation to local terrain and drainage features, beyond the general spill prevention measures already described;
- Summarizing how spill response planning sufficiently accounts for the volume of hazardous materials; and

- Identifying how materials generated during spill response (e.g., contaminated sorbents, snow/ice, soils, water) would be temporarily handled, stored, and transferred to approved disposal pathways following cleanup.

CIRNAC #2: Acid Rock Drainage and Metal Leaching Risk from Quarrying and Excavation-Run Materials

The geotechnical workplan explicitly notes that laboratory results are to be submitted regarding acid rock drainage (ARD) and metal leaching (ML) potential, including locations where acid rocks have been encountered, and discussion of test results used to determine acid generation and contaminant leaching potential. In parallel, the Project describes significant excavation and blasting needs for the new reservoir and associated works, and predicts the use of approximately 1,560,000 kg of explosives.

ARD/ML represents a potential high-consequence pathway if sulfide-bearing lithologies or reactive materials are encountered during blasting/excavation and then placed into dam/dyke, berm, quarry stockpile, or waste rock configurations, particularly across a 100-year operating horizon (as described). At this stage, the information package does not clearly demonstrate how ARD/ML uncertainty will be closed before major material placement decisions are finalized. CIRNAC recommends that the Proponent considers:

- Describing how ARD/ML test results will be used to inform decisions on the placement or reuse of excavation-run materials, where such linkage has not yet been described; and
- Summarizing how materials identified as having ARD/ML potential would be managed if encountered during excavation or blasting, including how such materials would be handled over time.

CIRNAC #3: Permafrost Sensitivity and Long-Term Integrity of Linear Works and Containment Features

The Project area is in a zone of continuous permafrost, with shallow surficial soils and poorly drained conditions due to frozen ground restricting water movement. It includes multiple linear works and buried/bermed infrastructure (e.g., pipelines over ~4.2 km with cover/side protection), as well as a new reservoir system comprised of eight dams/dykes. The geotechnical workplan indicates use of thermistors/piezometers, intended to evaluate ground temperature profiles and potential talik/freezeback issues near retention structures. However, it does not demonstrate how thaw settlement, thermokarst, erosion, or changing drainage patterns will be managed as ongoing integrity risks over a 100-year period. This poses a possibility of becoming a long-term environmental protection issue due to permafrost degradation creating new pathways for sediment release, hydrocarbon migration, and structural distress. CIRNAC recommends that the Proponent considers:

- Describing how the site-specific permafrost sensitivity is accounted for when confirming final alignments and structure footprints, including avoiding areas of elevated thaw susceptibility where practicable; and
- Clearly defining how routine inspection of linear works and containment features during key periods when ground disturbance or thaw-related effects inform any associated mitigation measures.

CIRNAC #4: Consultation with Interested Parties

CIRNAC recommends that the Proponent continue its efforts to engage with potentially interested parties regarding its project proposal. These parties include Iqaluit residents, the Amarok Hunters' & Trappers' Association, the Qikiqtani Inuit Association, Qulliq Energy Corporation, the Iqaluit Shooting Association, and any other relevant organizations or individuals.

As part of these consultation activities, several issues should be considered, including but not limited to:

- Incorporation of Inuit Qaujimaningit, Inuit Qauijimajatuqangit, Traditional Knowledge (NIRB, 2018), and Community Knowledge 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; 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,

Richard Bingley
Manager, Impact Assessment