

Memo



To: Nunavut Impact Review Board (NIRB)
Attention: Calvin Ehaloak, Acting Manager, Public Registry, Nunavut Impact Review Board

From: Michelle Roche, Dillon Consulting Limited on behalf of Heather Shilton, Nunavut Nukkiksautiit Corporation (NNC)

Date: March 6, 2026

Subject: Iqaluit Nukkiksautiit Project (INP) Project Proposal No. 126346

The Nunavut Nukkiksautiit Corporation (NNC) acknowledges receipt of the Nunavut Impact Review Board's (NIRB) request for additional information regarding Project Proposal No. 126346 for the Iqaluit Nukkiksautiit Project (INP).

NNC appreciates the Board's review and the opportunity to clarify and strengthen the submitted materials. In response to the information gaps identified in the Board's correspondence, NNC has prepared a Table of Concordance (Appendix A) which identifies where relevant information is currently addressed within the submitted Project Proposal and within supporting project documentation.

NNC notes that the INP is currently in an investigative phase. While preliminary conceptual engineering is ongoing, several design parameters, including final infrastructure alignments, reservoir inundation limits, and construction logistics remain subject to refinement pending completion of planned geotechnical, hydrological, and terrain investigations scheduled for 2026.

NNC also notes that advancing highly detailed conceptual engineering layouts at this stage may not provide additional clarity to the Board and could introduce procedural complexity within the review process. As additional technical information becomes available through planned field investigations, certain design elements may require refinement. Under the *Nunavut Planning and Project Assessment Act* (NuPPAA), significant revisions to core project components following submission could require amendments to project documentation during the review process. NNC considers it appropriate at this stage to provide conceptual information sufficient to support NIRB's screening determination while allowing project design to mature through the Environmental Impact Statement (EIS) phase, where refinements to the Project can be incorporated.

For certain project components, particularly those associated with construction logistics and contractor-led activities additional detail will be developed during detailed engineering, procurement planning, and contractor engagement. This may include:

- Construction staging and sequencing methodologies;
- Contractor logistics planning;
- Fuel management systems and storage volumes;
- Construction camp configuration and workforce accommodation; and
- Temporary infrastructure and materials handling plans.

These elements will be finalized during subsequent project development stages and incorporated into contractor execution plans, environmental management plans, and regulatory applications as the project advances.

NNC welcomes the opportunity to work collaboratively with NIRB during the next phase of the process. Development of Draft EIS Guidelines would allow NNC to align planned 2026 field programs with the Board's information requirements and ensure that baseline programs are designed to directly support the future assessment.

NNC remains committed to maintaining a coordinated regulatory approach with the Nunavut Water Board (NWB) and other authorities to support future licensing and permitting processes, including potential applications for a Type "A" Water Licence.

NNC appreciates the Board's continued guidance and looks forward to working collaboratively with NIRB as the project progresses. Updated materials and refinements to the Project Proposal will be provided as additional technical information becomes available.

Sincerely,

DILLON CONSULTING LIMITED



Michelle Roche, EP, RPF
Associate, Environmental Specialist

Attachments / Appendices

- Appendix A: Table of Concordance: NIRB Information Gaps and Document References

Appendix A

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Table of Concordance

NIRB Question	Summary Response ¹	Project Proposal
1. Mapping and Project Layout		
No detailed mapping of proposed access road routes.	Three potential all-season access road alignments (direct, flatter, and high) totaling approximately 65 km have been mapped conceptually. Final routing requires updated LiDAR which will be completed in 2026 and being assessed now.	Section 3.3 Section 3.4 Figure 1 (Project Location) Figure 2 (Local Project Area) Figure 6 (Land Use Map)
No defined transmission line alignment.	A 66-kilometre transmission line to Iqaluit is planned, generally following the proposed access road alignment.	Section 3.3 Section 3.4 Plain Language Summary
No finalized reservoir boundaries or inundation mapping.	Conceptual inundation mapping is provided for a full supply level (FSL) of 550 m, covering approximately 7,363 hectares.	Section 3.3 Plain Language Summary
No consolidated infrastructure layout showing all permanent components.	General project plans and site layouts showing the dam, spillway, powerhouse, and access routes are provided in the preliminary general arrangement drawings.	Section 2.2 Figure 2 (Local Project Area) Figure 6 (Land Use Map)
2. Construction and Logistics		
No clear indication whether new airstrips are proposed or if existing infrastructure will be used.	No new airstrips are proposed; the project will utilize existing international airport and port infrastructure in Iqaluit. Site access will be limited to ground and helicopter.	Section 3.4
Limited information on construction staging, sequencing, and site development methods.	Sequencing involves a temporary winter road, followed by permanent access roads and sequential headworks construction (river diversion and cofferdams).	Section 3.4

Appendix A: Table of Concordance: NIRB Information Gaps and Document References

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NIRB Question	Summary Response ¹	Project Proposal
3. Fuel Management		
Unclear whether fuel will be transported from Iqaluit or bulk stored onsite during construction.	A bulk storage tank is planned for backup generator support. All fuels will be managed per TDG Regulations. Logistics will be finalized during the tendering process. Specific volumes will be finalized during the tendering process.	Section 5.6 Section 5.7
If onsite storage is anticipated, no locations, volumes, or containment specifications are provided.	Onsite systems will require secondary containment and refuelling away from waterbodies. Specific volumes will be finalized during the tendering process.	Section 5.6 Section 5.7
4. Camp and Workforce Accommodation		
Investigative camp details are provided; however, no finalized construction camp plan or long-term workforce accommodation strategy is included.	A 50-person construction camp is planned. Long-term strategy involves converting modular worker accommodations in Iqaluit into permanent resident housing.	Section 3.3 Section 3.4
5. Water Use and Licensing		
Limited information on long-term water use volumes, reservoir operation, and discharge management.	Reservoir live storage is approximately 1.1 billion m ³ . The 15 MW system can operate full-time. Water levels will fluctuate by approximately 6 metres during normal operations.	Section 3.3
Clarification required regarding coordination with the Nunavut Water Board for a future Water Licence.	Baseline data is being collected to support a future Type 'A' Water Licence application. NNC is committed to ongoing engagement with territorial regulators.	Section 1.2 Section 4.1.3 Section 4.1.4

Appendix A: Table of Concordance: NIRB Information Gaps and Document References

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NIRB Question	Summary Response¹	Project Proposal
6. Dam Design Life and Project Life		
No information provided regarding anticipated dam design life, operational life of the reservoir, or long-term decommissioning/closure considerations.	Minimum infrastructure design life is 50 years, with an expected useful life of 90 years. A conceptual closure plan outlines gradual reservoir drawdown and site rehabilitation.	Section 7.9
7. Baseline Studies		
The submission includes ongoing baseline data collection information; however, it is not clearly distinguished from finalized engineering or construction-level documentation.	Documents explicitly state the project is in an early investigative phase and that the Design Basis will evolve as field data (permafrost, hydrology) is refined.	Section 1.1

Note:

1. Responses in this table are based on preliminary conceptual design information available at this stage of project development. Additional design detail will be refined through ongoing technical studies and will be provided to NIRB as the project advances.