



CIRNAC Comments to NIRB

Re: Notice of Screening for Government of Nunavut's
"Renewal and Amendment of Water Licence 3BM-
GRI2636 to Type A" Project Proposal



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

Your file - Votre référence
26WN045
Our file - Notre référence
GCdocs# 150403642

Sep 29, 2026

Mia Beattie
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 Government of Nunavut's "Renewal and Amendment of Water Licence 3BM-GRI2636 to Type A" Project Proposal

Dear Mia Beattie,

On September 8, 2026, the Nunavut Impact Review Board (NIRB) invited parties to comment on Government of Nunavut's "Renewal and Amendment of Water Licence 3BM-GRI2636 to Type A" project 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: Return-Flow Discharge Design and Erosion Control

The application proposes withdrawing up to 2,160 m³/day from Airport River and using a recirculation system whereby only the portion of pumped water required for treatment is directed to the water treatment plant, with the remaining water returned to Airport River downstream of the intake. Seasonal pumping may occur for up to 45 days, and the application states that the return outlet would be placed near large stones to reduce flow energy and limit localized erosion. However, limited information is provided regarding the expected range of return-flow volumes and the potential for erosion or sediment mobilization at the discharge location. As the amount of water returned would vary according to operating conditions, it is unclear whether the proposed measure of discharging near large stones would be sufficient to prevent localized scour, bank erosion, or sediment mobilization during operation. CIRNAC recommends that the Proponent consider:

- Clarifying the anticipated range and maximum return-flow volumes associated with the proposed recirculation system; and
- Demonstrating that the proposed erosion-control approach would be sufficient to prevent localized scour, bank erosion, and sediment mobilization at the discharge location.



CIRNAC #2: Solid Waste Runoff and Hazardous-Waste Management

The existing Solid Waste Disposal Facility receives general, bulky and hazardous wastes. The 2026 water-licence review documented that hazardous waste was not fully segregated and that drums containing waste oil and other unknown liquids were not stored separately. The review also identified three seasonal streams that convey surface water from the disposal site to the ocean, while upgrades to the facility are planned for future implementation. Although the current licence requires segregation and storage of hazardous waste in a manner that prevents the deposit of deleterious substances into water, the documented site conditions indicate that seasonal runoff may provide a pathway for contaminants to migrate from the facility. The available information does not establish that contamination is occurring; however, uncertainty remains regarding the effectiveness of existing controls pending implementation of planned facility upgrades. CIRNAC recommends that the Proponent consider:

- Describing the measures currently in place to manage hazardous waste, waste oil, and other potentially contaminating materials at the Solid Waste Disposal Facility, including measures intended to prevent contact between waste materials and seasonal runoff; and
- Providing information demonstrating that existing and planned controls are sufficient to minimize the potential for contaminant migration from the Solid Waste Disposal Facility to adjacent land and seasonal drainage pathways.

CIRNAC #3: Consultation with the Qikiqtani Inuit Association

CIRNAC recommends that the Proponent continue to engage with the Qikiqtani Inuit Association on its 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 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

