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

Water Licence Amendment And Renewal Application from Type “A” Water Licence 2 AM-DOH1335

Nunavut Water Board Public Hearing
October 15-16, 2026



Canada

Presentation Outline

- Role and Responsibilities
- Contributions to the Water Licence Application Review
- Technical Review
- Reclamation Cost Estimate
- Conclusion

Roles and Responsibilities

Crown-Indigenous Relations and Northern Affairs Canada's (CIRNAC) responsibilities, mandate, and obligations are in alignment with the following:

- *Crown-Indigenous Relations and Northern Affairs Act*
- Nunavut Agreement
- *Nunavut Land Claims Agreement Act*
- *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the associated regulations
- *Nunavut Planning and Project Assessment Act*
- *Territorial Lands Act* and the associated regulations
- *Arctic Waters Pollution Prevention Act*

Contributions to Water Licence Application Review

CIRNAC made the following submissions to the Nunavut Water Board regarding :

- March 19 2026 – First Round of the Review of the Licence Completeness Check
- April 20, 2026 – Second Round of the Review of the Licence Completeness Check
- May 1, 2026 – CIRNAC's Response to Round 2 of the Information Request Responses to the NWB
- May 14, 2026 - Participation in a Working group with Agnico Eagle and the Kitikmeot Inuit Association
- June 4 and 5, 2026 – Participation in a Working group with Agnico Eagle, ECCC, DFO and the Kitikmeot Inuit Association
- June 19, 2026– CIRNAC's submission of technical review comments

Contributions to Water Licence Application Review

CIRNAC made the following submissions to the Nunavut Water Board regarding

- July 16-17, 2026 – Participation to the Technical Meeting, Community Session and Pre-Hearing Conference
- July 28 and August 17, 2026 – Communication about the proposed Licence condition regarding the transition from the approved slurry tailings deposition method to dry-stack tailings deposition.
- September 10, 2026 - Agreement in Principle on the Quantum of Security
- September 10, 2026 – CIRNAC's Final Written Submission and Draft Water Licence Review.
- October 1, 2026 – CIRNAC submission of the Public Hearing Presentation
- Ongoing discussion regarding the Security Split between the Land Owner and the Crown, subject to an agreement on a Security Management Agreement with the Kitikmeot Inuit Association (KIA).

CIRNAC's Resolved Technical Comments
Scope of the Type "A" Water Licence Amendment

TRC	Issue
R-01	Quality of Water Sources
R-02	Discharge Criteria
R-04	Methods of Extraction and Operation of Pumps
R-05	Water Management Infrastructure Information
R-06	Prediction of Climate Trends
R-07	Ice Road
R-08	Management Plans
R-09	Outstanding Information Requests with Commitment from Proponent
R-16	Updated Tailings Facility Design and Operation
R-17	Justification of Maximum Water Withdrawal Rates (Dry Stack Transition)
R-18	Water Balance Stress Test (Non-Average Conditions)
R-19	No Freshwater Discharge Commitment
R-21	Under-Ice / Seasonal Operations Constraint

CIRNAC's Unresolved Technical Comments Scope of the Type "A" Water Licence Amendment

TRC	Issue	Unresolved Concern
R-12	Life of Mine (LOM) Reconciliation with Increased Throughput	CIRNAC requested clarification regarding total revised project duration, total revised project tonnes, total revised project duration cumulative water implications, in comparison with the original FEIS, actual operations to date and the proposed remaining operating period. Required to assess whether cumulative water use and waste discharge effects remain within what was previously assessed for the existing water Licence.

R-12 – Partially Resolved

CIRNAC's Unresolved Technical Comments
Wastewater Management and Treatment

TRC	Issue	Unresolved Concern
R-03	Summary Table Of Expected Quality And Quantity Of Water And Adaptative Management Criteria	CIRNAC requested a consolidated summary of predicted water quality, water quantities, adaptive management triggers, and response actions across the site to support detection of early warning signs of water management issues and protection of the receiving environment in the event of unplanned discharges or spills.
R-20	Source Term Conservatism and Sensitivity	CIRNAC requested clarification of conservative modelling assumptions and sensitivity analyses for geochemical source-term predictions, which directly influence projected water quality outcomes and compliance under the existing Water Licence.

R-03 – Unresolved
R-20 – Unresolved

CIRNAC's Unresolved Technical Comments
Waste Management

TRC	Issue	Unresolved Concern
R-10	Tailing Volume Comparison and Reconciliation to FEIS	CIRNAC requested a reconciliation between proposed tailings quantities and volumes assessed during previous approvals, including the FEIS, to confirm that associated water management requirements and long-term water quality risks remain within the bounds of the existing Water Licence.
R-11	Waste Rock Quantities and Mining Area Reconciliation to FEIS	CIRNAC requested that the proponent reconcile mined tonnes and waste rock volumes with FEIS assumptions, confirm spatial limits or quantify expansions, identify increased total mining versus sequencing/throughput change only and demonstrate that geochemical and water-management effects remain within prior bounds and the assumptions in the existing Water Licence.

R-10 – Unresolved
R-11 – Unresolved

CIRNAC's Unresolved Technical Comments
Waste Management

TRC	Issue	Unresolved Concerns
R-13	Multiple-Accounts Analysis (MAA) – Tailings Management Strategy Selection	CIRNAC requested the Multiple-Accounts Analysis supporting the selection of filtered tailings over alternative tailings management approaches, as the proposed transition from a slurry-based system represents a material change to the water management approach assumed under the existing Water Licence.
R-14	Dry Stack Tailings Closure Strategy	CIRNAC requested additional details regarding closure design, performance predictions, and closure costs for the dry-stack tailings facility, as closure performance will directly influence long-term water management outcomes
R-15	Fugitive Dust and Air Quality – Dry Stack Tailings (Operational Phase)	CIRNAC requested assessment of dust generation, contaminant composition, mitigation measures, and potential impacts on water quality.

R-13 – Unresolved
R-14- Partially Resolved
R-15 - Unresolved

CIRNAC's Unresolved Technical Comments Monitoring and Reporting

TRC	Issue	CIRNAC's Unresolved concerns
R-22	Uncertainty Register And Commitments	CIRNAC recommended that the proponent produce a formal uncertainty register identifying risks, mitigation measures, timelines, and commitments, to track, manage, and resolve uncertainties affecting water management and enforceability of commitments under the water licence.

R-22 – Unresolved

Closure and Reclamation Planning

TRC	Issue	CIRNAC's Unresolved concerns
R-23	Interim Closure And Reclamation Plan (ICRP) And Security	CIRNAC recommended that the proponent produce a more detailed ICRP and an updated closure security estimate reflecting the amended project scope.

R-23 – Unresolved

CIRNAC's Proposed Licence Condition Transition from Approved Slurry Tailings Deposition method to Dry-Stack Tailings Deposition

Minimum conditions

- The currently approved tailings deposition methodology remains slurry tailings deposition;
- The **transition to dry-stack tailings has not yet been approved**;
- Implementation of dry-stack tailings cannot occur unless and **until the Board reviews and approves the required technical information**; and
- the **Board retains full discretion to determine whether the proposed transition is acceptable** following review of that information.

Required Technical Information

- Detailed technical rationale and alternatives assessment;
- Updated Water Quality and Load Balance Model;
- Updated Interim Closure and Reclamation Plan for the Tailings Impoundment Area;
- Updated environmental security estimate;
- Updated Tailings Deposition Plan; and
- All relevant design and construction documentation.

CIRNAC does not support reliance on Part B Item 9 and Part B Item 13.

Reclamation Cost Estimate

Tranche	Activity	Total Security (Security held under the Licence)	Additional Security Required Per Tranche	Security Amount Held
1	2026 Water Licence Amendment + Security already held	$72,907,727	$25,163,867	$98,071,594
2	TIA Erosion Cover full footprint		$203,883	$98,275,477
3	TIA Geomembrane		$5,277,769	$103,553,246
4	All-weather Road Madrid-Boston, including quarries and crossings		$1,875,000	$105,428,246
5	Future Accommodation		$375,000	$105,803,246
6	Wind Turbine Pad 1, 3, 4, 5, 6		$1,837,805	$107,641,051
7	Cargo Dock		$525,274	$108,166,325
				$108,166,325

The above table is based on forecasted activities; however, these activities, works, and undertakings are subject to change based on mine plan advancements and other factors.

If the changes to forecasted activities will result in material changes to the Undertaking, the risk of environmental damage associated with the Undertaking could result in material change to the overall or individual referenced Tranche reclamation liability associated with the Undertaking. This may result in a further amendment or security review.

Conclusion

CIRNAC respectfully defers to the Board's decision-making process and its consideration of the information and recommendations submitted during these proceedings. CIRNAC remains available to provide any additional clarification or technical support that may assist the Board.


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