



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
918 Nunavut Drive
Iqaluit, NU, X0A 3H0

Your file - Votre référence
2BE-HAK2126
Our file - Notre référence
GCDocs# 143482207

February 5, 2026

Robert Hunter
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
E-mail: licensing@nwb-oen.ca

Re: Crown-Indigenous Relations and Northern Affairs Canada's Response to Reply on the Review of the Licence Renewal Application for Hackett River Project, Type B Water Licence No. 2BE-HAK2126

Dear Robert,

Thank you for the January 25, 2026 invitation to review the referenced licence renewal application, submitted by Glencore Canada Corp., for Type B Water Licence No. 2BE-HAK2126.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the application pursuant to its mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Crown-Indigenous Relations and Northern Affairs Act*. Please find CIRNAC comments and recommendations in the attached Technical Memorandum.

If there are any questions or concerns, please contact me at (867) 975-3877 or Joyce.Demers@rcaanc-cirnac.gc.ca or Andrew Keim at (867) 975-4550 or Andrew.Keim@rcaanc-cirnac.gc.ca.

Sincerely,

Joyce Ds

Joyce Demers, B.Sc.,
A/ Manager of Water Resources



Technical Review Memorandum

Date: February 5, 2026

To: Robert Hunter – Licensing Administrator, Nunavut Water Board

From: Joyce Demers – A/Manager of Water Resources, CIRNAC

Subject: **Crown-Indigenous Relations and Northern Affairs Canada’s Response to Reply on the Review of the Licence Renewal Application for Hackett River Project, Type B Water Licence No. 2BE-HAK2126**

Region: Kitikmeot Kivalliq Qikiqtani

CIRNAC provides the following comments and recommendations pertaining to the application package. A summary of the subjects of recommendations can be found in Table 1. Documents reviewed as part of this submission can be found in Table 2 of Section B. Detailed technical review comments can be found in Section C.

Table 1: Summary of Recommendations

Recommendation Number	Subject	Status
R1	Missing Management Plans and Missing Information	Unresolved
R2	Spill Contingency Plan	Resolved
R3	Abandonment and Restoration Plan	Resolved with Comment
R4	Post Closure Monitoring Duration	Unresolved
R5	Consistency Between Plans	Unresolved
R6	2016 Inspection Report	Resolved

B. DOCUMENTS REVIEWED AND REFERENCED

The following table (Table 2) provides a list of the documents reviewed under the submission and reference during the review.

Table 2: Documents Reviewed and Referenced

Document Title	Author, File No., Rev., Date
260129 2BE-HAK2126 WL Renewal Responses to Comments-ILAE	Glencore Canada Corp., January 29, 2026
201113 2BE-HAK1621 Updated Waste Management Plan-IMLE	Glencore Canada Corp., November 13, 2020



C. RESULTS OF REVIEW

1. Missing Management Plans and Missing Information

Comment:

Below is a list of missing information:

- a. The application does not include a waste management plan. The concern is that the information for the plan are either scattered in other plans or missing. A waste management plan is needed to ensure that waste is properly managed with a transfer schedule is in place.

There is missing information on how hazardous materials and all waste types are stored. Hazardous materials and waste must be stored in secondary containment and a minimum 31 meters away from the normal high water mark of any water body, while non-hazardous waste only needs to be stored a minimum 31 meters away from the normal high water mark of any water body.

The Nunavut Water board in a letter to the applicant, dated November 12, 2020, stated that an updated Waste Management Plan was due on May 31, 2016. An updated plan was submitted to the Nunavut Water Board on November 13, 2020 however this plan was not submitted as part of the application process. It is unclear why the plan was not submitted for review with the application.

- b. It is also unclear if drilling will occur within 31 meters of the normal high water mark of any water body.
- c. There is no mention of capping or other measures if artesian flow is hit while drilling.
- d. It is not clear if all structures are located beyond the 31 meter set back required from normal high water mark of any water body from the images provided.

The concern is that without this information it is possible for materials to be stored improperly which may cause hazardous materials to end up in nearby water bodies.

Recommendation:

(R-01) CIRNAC recommends that the applicant provide a Waste Management Plan and the other missing information.

Glencore Reply:

“The Hackett River Project has an existing approved Waste Management Plan, as indicated in Part D, Condition 10 of the water licence 2BE-HAK2126, and this plan is available on the NWB public registry. This plan was not included in the application package as it is already approved and no material changes were deemed necessary. In contrast, the Spill



Contingency Plan (SCP) and Abandonment and Restoration Plan (ARP) updated and submitted earlier in 2025 with the 2025 Annual Report (in accordance with the Part B, Condition 2.g. of 2BE-HAK2126) were included in the application materials as they have not yet received formal approval. It is also noted that Glencore referred CIRNAC to the 2020 Waste Management Plan during the last renewal of this licence (in 2021), and confirmed that it contained the information being requested by CIRNAC at that time¹.

In regards to the concerns raised by CIRNAC, it is noted that these are specifically addressed by conditions standard to Nunavut Type B water licences, including in 2BE-HAK2126. I.e. :

- a. Part F, Condition 1 of 2BEHAK2126 requiring that *“The Licensee shall not conduct any landbased drilling within thirty-one (31) metres of the ordinary High Water Mark of any waterbody, unless otherwise approved by the Board in writing”*
- b. Part F, Condition 3 of 2BEHAK2126 requiring that *“If artesian flow is encountered, drill holes shall be immediately sealed and permanently capped to prevent induced contamination of groundwater or salinization of surface Waters. The Licensee shall report all artesian flow occurrences within the Annual Report, including the location (GPS coordinates) and dates”*.
- c. And in alignment with the requirements of 2BEHAK2126 and preceding licences, Glencore confirms that all waste deposits (Part D, item 1), greywater sumps (Part D, item 8), latrine pits (Part D, item 9), any earthwork debris and sediment (Part E, item 4), land based drilling (Part F, item 1), drill waste (Part F, item 2), sumps and fuel caches (Part H, item 2), and drill core (Part H, item 13) are *“a minimum distance of thirty-one (31) metres from the ordinary High Water Mark of any waterbody such that the quality, quantity or flow of Water is not impaired”*. Glencore anticipates that these conditions will remain in the renewed licence and Glencore will continue to comply with all Licence conditions.”

CIRNAC’s Response:

CIRNAC’s position is that all management plans must be submitted with renewals as it is possible that standards have changed. Without the full renewal application package CIRNAC is unable to make a fulsome review of the application.

For example the 2020 updated waste management plan:

Section 3.1.4 in the updated waste management plan states that “A protocol for pH testing of effluent from cuttings will be submitted as an addendum to this report in October 2013 to address the Inspector’s concerns (AANDC 2013).”. It is unclear why these protocols did not make its way into the updated management plan in 2020.

CIRNAC recommends that an updated management plan be provided and reviewed prior to renewal of the license.



3. Abandonment and Restoration Plan

Comment:

There are a few items which should be updated in the next iteration of the Abandonment and Restoration plan:

- a. The revision history should contain a table with the minimum information: date of revision, section number that was changed, and a summary of the changes made.
- b. Several section of the plan refer to AANDC such as Section 1 Introduction states that the issuing body is AANDC. The updated name of the department is Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) and should be reflected throughout the plan.
- c. Suggestion: the revision history table should be located at the start of the plan before the introduction to ensure more clarity between versions which will allow for a quicker review of the plan.

Recommendation:

(R-03) CIRNAC recommends that the plan be updated to include the comments above and submitted so that it can be reviewed and commented on.

Glencore Reply:

“Glencore has removed the outdated references and, at CIRNAC’s request, added a revision log to the front of the attached plan. Given the administrative nature of these changes and the absence of comments by other reviewers on this ARP, Glencore asks the NWB to approve this plan without a further round of review.”

CIRNAC’s Response:

CIRNAC’s agrees with Glencore that the changes listed in Recommendation 3 do not need to be reviewed. However, CIRNAC does not agree with Glencore on the post closure monitoring duration which is located in the document. Therefore, comment 3 is considered resolved however disagrees that the document does not need to be reviewed as the post monitoring duration is not agreed on by CIRNAC.

4. Post Closure Monitoring Duration

Comment:

Section 7 of the Abandonment and Restoration plan states that

“Post closure monitoring and inspection will occur annually for 2 years after final reclamation activities completed to confirm site stability.”



The concern is that two years is not enough time after closure to be completed to ensure that physical and chemical stability is reached. CIRNAC recommends a minimum of 25 years post closure to ensure chemical and physical stability of the site.

Recommendation:

(R-04) CIRNAC recommends that the applicant change the plan to reflect a minimum of 25 years post closure monitoring to ensure chemical and physical stability of the site.

Glencore Reply:

“The Hackett River Project is an exploration phase project consisting entirely of temporary structures and does not include any engineered facilities, tailings storage facilities, landfills, landfarms, or bulk fuel storage. Consistent with this project stage, and other Nunavut Type ‘2BE’ water licences, the Project does not have prescribed monitoring stations or post-closure monitoring requirements.

Despite the absence of a requirement to do so, Glencore has voluntarily offered to conduct two years of post-closure monitoring. CIRNAC’s recommendation that this commitment is insufficient, and that “a minimum of 25 years of post-closure monitoring” be required (a term longer than that of currently operating mines), is not supported by the Project design, regulatory precedent, or accepted industry practice, and is therefore not considered reasonable or warranted.”

CIRNAC’s Response:

CIRNAC does not agree with Glencore. Two year is not enough time to ensure the chemical and physical stability of a site before complete closure. CIRNAC restates recommendation that the applicant change the plan to reflect a minimum of 25 years post closure monitoring to ensure chemical and physical stability of the site.

5. Consistency Between Plans

Comment:

There are a few minor discrepancies between plans such as the number of helicopter pads and distances between the closest communities.

Recommendation:

(R-05) CIRNAC recommends that the plans be updated to correct for these discrepancies and submitted within 90 days for review. Note that submission of new plans with the annual report is not supported. New plans and updates should be submitted as stand alone documents for review.

Glencore Reply:

“Glencore was not able to find the minor inconsistencies identified here. Both the SCP and ARP indicate that there are 3 heli pads and this information is not addressed in the Waste



Management Plan. The ARP is also the only plan that notes the distance to a local community (Cambridge Bay; approximately 300 km away). It is also noted that Nunavut water licences specify that plan updates be included with submission of the Annual Reports, and that this is the case in 2BE-HAK2126 Part B, Condition 2.g. which requires the Annual Report include “Any revisions to the Spill Contingency Plan, Abandonment and Restoration Plan, and any other Plans as required by Part B, Item 7, submitted in the form of an Addendum”.

CIRNAC’s Response:

CIRNAC notes that the application (attachment 1) under section 3. Name of Project states that “*Hackett River Project, located approximately 104 km south of the community of Bathurst Inlet, Kitikmeot Region, Nunavut*” while all the plane language summaries, spill contingency plan and abandonment and restoration plan state that “The property is situated on Crown Land and on Inuit-Owned Land approximately 300 km south of Cambridge Bay and 80 km southwest of Bathurst Inlet.”. CIRNAC was mistaken that the application form was different and not a plan which there was a discrepancy.

In the Spill Contingency plan section 5 Figure 2 as seen below show potentially up to 5 helicopter pads. Given that the image is from 2015 it is highly likely that the site has changed and potentially consolidated areas. All written mentions of the helicopter pads say that there are three.

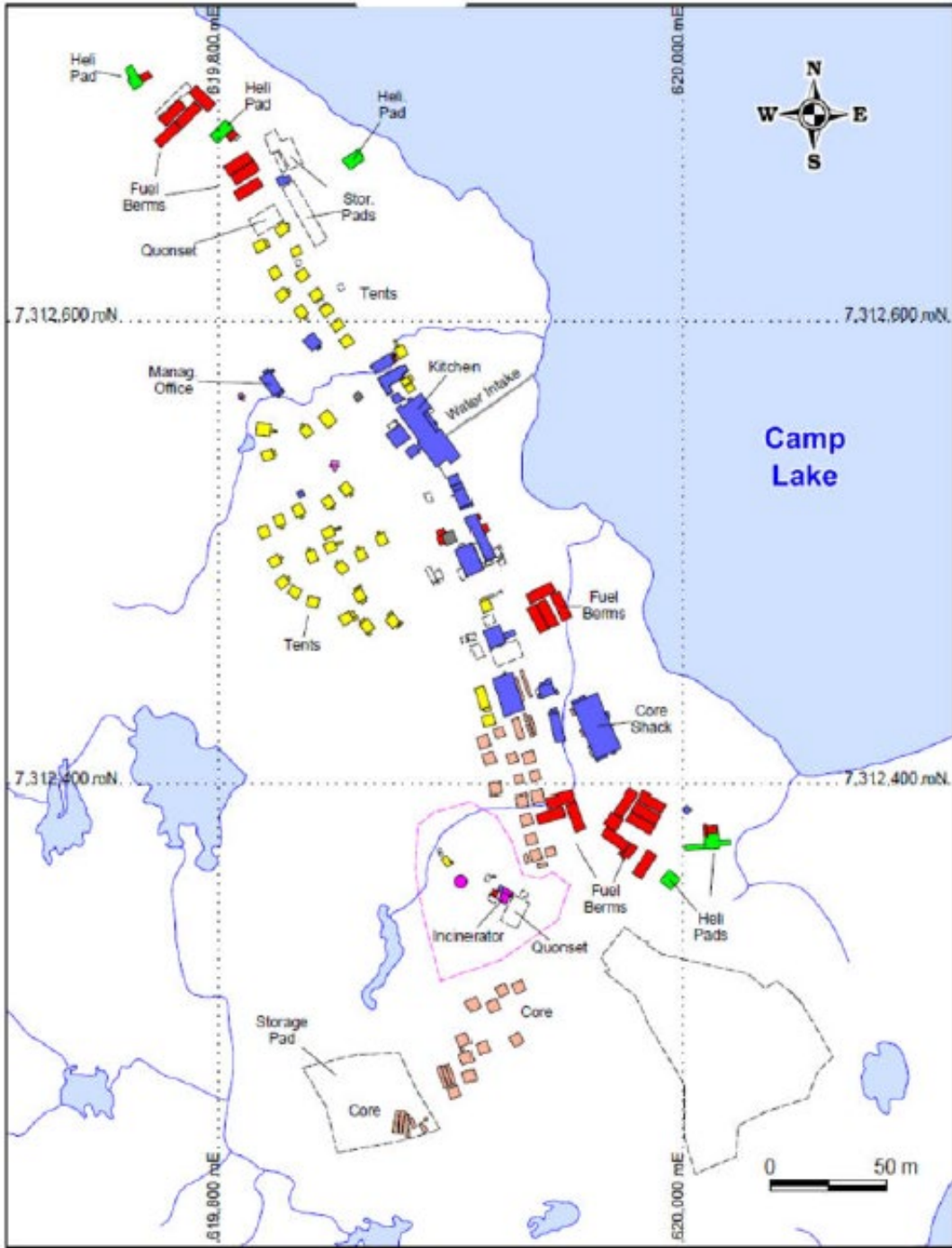


Figure 2: Site Layout, Hackett River Camp, 2015