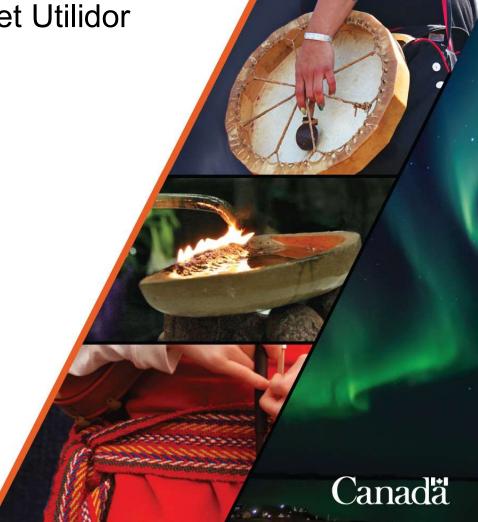
Final Written Submission

Nunavut Water Board Water Licence Application Review for Licence 3AM-GRA1624

Government of Nunavut Community and







EXECUTIVE SUMMARY

The Government of Nunavut, Community and Government Services has applied to the Nunavut Water Board to amend and renew Type A water licence 3AM-GRA1624 for the use of water and deposit of wastewater in the Hamlet of Rankin Inlet. A utilidor system in Rankin Inlet distributes water and collects wastewater throughout most of the community, with a few buildings serviced by trucked water and sewage. Potable water is drawn from Nipissar Lake, which is replenished with water pumped from Char River. Wastewater is discharged to Prairie Bay through a diffuser after undergoing primary treatment at a wastewater treatment plant.

The current licence amendment application requests to move the pumping location for water to replenish Nipissar Lake from Char River to Lower Landing Lake. Lower Landing Lake is Char River's source and is approximately 200 m upstream from the currently authorized pumping location. Four additional changes to the water licence were requested with the amendment:

- 1. extending the licence term by 6 years, until 2031;
- 2. removing quarterly reporting requirements;
- 3. removing monitoring at compliance point GRA-6, the pumping location on Char River; and
- 4. discontinuing the requirement to submit an adaptive management plan for pumping.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) has participated throughout the review process. CIRNAC submitted an information request on October 16, 2020 as part of the completeness check, and seven technical comments and recommendations on December 7, 2020, to the Nunavut Water Board. The Government of Nunavut, Community and Government Services responded to Information Requests on October 26, 2020, and to comments on December 21, 2020. These responses helped to resolve all CIRNAC comments apart from one, which recommended modifications to the monitoring requirements at stations GRA-6 (located upstream from the pipeline across Char River) and GRA-7 (located next to the pipeline intake on Lower Landing Lake).

CIRNAC participated in the Technical Meeting and Pre-Hearing Conference on February 25, 2021. Details of the monitoring requirements for stations GRA-6 and GRA-7 were discussed during the Technical Meeting, and a commitment was made by the Government of Nunavut, Community and Government Services at the Pre-Hearing Conference to submit more details on the Monitoring Program; a technical memorandum containing this information was submitted on March 1, 2020, which resolved CIRNAC's final comment.

The Nunavut Water Board distributed a Pre-Hearing Conference Decision Report on March 25, 2021. The report included the following list of issues which were discussed throughout the process:

- Scope of Amendments to the Existing Licence;
- Water Quantity and Timing of Pumping;



- Construction of New Facilities;
- Compliance History;
- Monitoring Program; and
- o Closure and Reclamation Planning.

CIRNAC is pleased to submit this Final Written Submission for consideration by the Nunavut Water Board. Comments have been organized in accordance with the Nunavut Water Board's Pre-Hearing Conference Decision Report list of issues. All CIRNAC comments have been resolved.



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RÉSUMÉ

Les Services communautaires et gouvernementaux du gouvernement du Nunavut ont demandé à l'Office des eaux du Nunavut de modifier et de renouveler le permis d'utilisation des eaux de type A 3AM-GRA1624 visant l'utilisation des eaux et le rejet de eaux usées dans le hameau de Rankin Inlet. À Rankin Inlet, un réseau de distribution aérien sous coffrage distribue l'eau et recueille les eaux usées dans la majeure partie de la collectivité, tandis que quelques bâtiments sont desservis par des camions-citernes et des camions sanitaires. L'eau potable provient du lac Nipissar, lequel est réapprovisionné par l'eau pompée dans la rivière Char. Les eaux usées sont rejetées dans la Prairie Bay par un diffuseur après avoir subi un traitement primaire dans une usine de traitement des eaux usées.

La demande actuelle de modification de permis sollicite le déplacement du lieu de pompage de l'eau destinée au réapprovisionnement du lac Nipissar de la rivière Char au lac Lower Landing. Le lac Lower Landing est la source de la rivière Char et se trouve à environ 200 mètres en amont du lieu de pompage actuellement autorisé. La modification du permis d'utilisation de l'eau fait l'objet de quatre autres changements :

- 1. prolongation du permis de 6 ans, jusqu'en 2031;
- suppression des exigences en matière de rapports trimestriels;
- 3. suppression de la surveillance au point de conformité GRA-6, le lieu de pompage sur la rivière Char;
- 4. abandon de l'obligation de soumettre un plan de gestion adaptative concernant le pompage.

Relations Couronne-Autochtones et Affaires du Nord Canada (RCAANC) a participé à l'ensemble du processus de révision. RCAANC a présenté une demande de renseignements le 16 octobre 2020 dans le cadre de la vérification de l'exhaustivité et sept commentaires et recommandations techniques ont été soumis le 7 décembre 2020 à l'Office des eaux du Nunavut. Les Services communautaires et gouvernementaux du gouvernement du Nunavut ont répondu aux demandes de renseignements le 26 octobre 2020, et aux commentaires le 21 décembre 2020. Ces réponses ont permis de résoudre tous les commentaires de RCAANC, à l'exception d'un seul qui recommandait la modification des exigences de surveillance de la station GRA-6 (située en amont du pipeline traversant la rivière Char) et de la station GRA-7 (située à côté de la prise d'eau du pipeline sur le lac Lower Landing).

RCAANC a participé à la réunion technique et à la conférence préparatoire à l'audience le 25 février 2021. Les détails concernant les exigences de surveillance des stations GRA-6 et GRA-7 ont été abordés à la réunion technique, et les Services communautaires et gouvernementaux du gouvernement du Nunavut se sont engagés lors de la conférence préparatoire à l'audience à soumettre plus de détails sur le programme de surveillance. Un mémoire technique contenant ces informations a été soumis le 1^{er} mars 2021, ce qui a permis de résoudre le dernier commentaire de RCAANC.



L'Office des eaux du Nunavut a distribué un rapport de décision de la conférence préparatoire à l'audience le 25 mars 2021. Le rapport comprenait la liste suivante des questions abordées tout au long du processus :

- o ampleur des changements au permis existant;
- o quantité d'eau et moment du pompage;
- o construction de nouvelles installations;
- o antécédents en matière de conformité;
- o programme de surveillance;
- o planification de la fermeture et de la remise en état.

RCAANC est heureux de soumettre ce mémoire final à l'examen de l'Office des eaux du Nunavut. Les commentaires ont été organisés selon la liste de questions du rapport de décision de la conférence préparatoire à l'audience de l'Office des eaux du Nunavut. Tous les commentaires de RCAANC ont été résolus.



TABLE OF CONTENTS

	0
EXECUTIVE SUMMARY	
EXECUTIVE SUMMARY - INUKTITUT	Error! Bookmark not defined.
RÉSUMÉ	4
NTRODUCTION	7
LIST OF ISSUES	10
Scope of Amendments to the Existing Licence	10
o Water pumping rate	10
o Water pumping plan	10
o Term of amended licence	11
Water Quantity and Timing of Pumping	11
o Timing of pumping from Lower Landing Lake	11
o Construction of New Facilities	12
Compliance History	13
o Quarterly reporting	13
Monitoring Program	13
o Modifications to monitoring program	13
Closure and Reclamation Planning	15
o Reclamation plans for old intake	15
CONCLUSION	16
REFERENCES	17



INTRODUCTION

The Hamlet of Rankin Inlet, located in the Kivalliq Region of Nunavut, currently holds a Type A Water Licence, No. 3AM-GRA1624. This licence allows for Municipal Undertakings and covers activities regarding potable water withdrawals from the primary water source of Nipissar Lake, which is replenished with water pumped from Char River, and for the deposit of wastewater. A utilidor system in Rankin Inlet distributes water and collects wastewater throughout most of the community, with a few buildings serviced by trucked water and sewage. Wastewater is discharged to Prairie Bay through a diffuser after undergoing primary treatment at a wastewater treatment plant.

On September 16, 2020, on behalf of the Hamlet of Rankin Inlet, the Government of Nunavut, Community and Government Services (GN-CGS) applied to the Nunavut Water Board (NWB) to amend Type A Water Licence No. 3AM-GRA1624. The amendment under consideration involves increasing the scope of water licence 3AM-GRA1624 to include:

- 1. extending the licence term by 6 years, until 2031;
- 2. removing quarterly reporting requirements;
- 3. removing monitoring at compliance point GRA-6, the pumping location on Char River; and
- 4. discontinuing the requirement to submit an adaptive management plan for pumping.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) is an Intervener in the Nunavut Water Board water licensing process. CIRNAC reviewed 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*. A complete list of documents reviewed can be found in Table 1.

Table 1: Documents Reviewed as part of the Application Review

Document Title	Author, File No., Rev., Date		
Application Package for Amendment and Renewal of 3AM-GRA1624			
Government of Nunavut – CGS Water Licence No. 3AM-GRA1624 Amendment Application Executive Summary	GN-CGS, March 31, 2020		
Rankin Inlet Renewal Application for Type A Water Licence No. 3AM-GRA1624	GN-CGS, September 16, 2020		
Diagram of Pipeline Extension to Lower Landing Lake	GN-CGS, February 14, 2018		
Nipissar Lake and Lower Landing Lake Water Balance Assessment	Golder Associates, February, 2016		
Wastewater Treatment Plant Upgrades Rankin Inlet Final Report: Process Selection and Design Concept	GN-CGS, Report No. 1534002, July 6, 2020		
2019 Annual Report for Licence No. 3AM-GRA1624	GN-CGS, September 16, 2020		
3AM-GRA1624 Plan for Compliance	GN-CGS, September 16, 2020		
Aerial Photo of Rankin Inlet	GN-CGS, September 16, 2020		
Rankin Inlet Wastewater Effluent Study	Dillon Consulting, File No. 18-8483, March 31, 2020		



Document Title	Author, File No., Rev., Date	
Supplemental Submissions		
Letter to the Nunavut Water Board Re: Licence No: 3AM-GRA1624 – Community and Government Services – Water Licence Amendment	GN-CGS, October 27, 2020	
Letter to the Nunavut Water Board Re: Licence No: 3AM-GRA1624 – Kivalliq Region – Hamlet of Rankin Inlet – Water License Amendment and Renewal	GN-CGS, December 16, 2020	
Water License 3AM-GRA1624 Amendment Application: Supplemental Information	GN-CGS, March 1, 2020	
Hamlet of Rankin Inlet Environmental Monitoring Program and Quality Assurance/Quality Control Plan.	GN-CGS, April 2021	
Environmental Emergency Contingency Plan	GN-CGS, April 2021	

CIRNAC provided one information request on October 16, 2020. GN-CGS responded to the information request on October 27, 2020 and on November 9, 2020, the NWB provided notice of the commencement of the full technical review period. On December 7, 2020, CIRNAC provided technical review comments to the NWB. The subjects of the comments and recommendations can be found in Table 2. As indicated in Table 2, all of those concerns have been resolved.

GN-CGS replied to intervener technical review comments on December 21, 2020. The NWB held a Technical Meeting and Pre-Hearing Conference (PHC) by teleconference on February 25, 2021. The majority of CIRNAC concerns were resolved at the Technical Meeting. GN-CGS made a list of commitments at the PHC which tentatively resolved the remaining CIRNAC concerns. These commitments are recorded in Appendix D of the 3AM-GRA1624 PHC Decision Report (NWB, 2021). On March 1, 2021, CIRNAC received the commitments made by GN-CGS in the PHC in the form of a technical memorandum, which resolved CIRNAC's final comment.

Table 2: Summary of Information Requests (IR) and Technical Comments (TC) Recommendations

CIRNAC Review Comments	Subject	Resolution Status
IR 1	Environmental Monitoring Program and Quality Assurance / Quality Control Plan	Resolved
TC 1	Water pumping rate	Resolved
TC 2	Timing of pumping from Lower Landing Lake	Resolved
TC 3	Water pumping plan	Resolved – Follow-Up required by NWB
TC 4.1; TC 4.2	Modifications to monitoring program	Resolved
TC 5	Reclamation plans for old intake	Resolved
TC 6	Quarterly reporting	Resolved
TC 7	Term of amended licence	Resolved – Follow-Up required by NWB



In the 3AM-GRA1624 PHC Decision Report (NWB, 2021), the NWB provided a list of issues to be discussed during the written public hearing. These topics have been used as headings in this document to organize the technical comments submitted by CIRNAC. Detailed technical review comments, resolutions, and further recommendations can be found in the next section. References which are separate from the application documents can be found at the end of this document.



LIST OF ISSUES

Scope of Amendments to the Existing Licence

Water pumping rate

The application proposes to change the drinking water intake location from Char River to Lower Landing Lake, and increase the pumping rate from 3,876m³/day to 10,000m³/day (equivalent to 0.12m³/s). CIRNAC expressed concern that this increased pumping rate may impact ecological flows in Char River.

Part C, Item 4 of the current water licence specifies "Withdrawal of Water shall not exceed 10% of the instantaneous flow of Char River." In the Pumping Adaptive Management Plan, 10% of flow was estimated at 0.07m³/s. The Water Balance Assessment specifies the information available tying flow in Char River to Lower Landing Lake levels is only sufficient to develop an annual perspective. Since the river system is dynamic throughout the open water season, CIRNAC noted that considering the yearly balance might miss potential issues during low flow periods in July and August.

Table 3:

Recommendation No.	Concern	Status
1	An increased pumping rate may impact ecological flows in Char River	Resolved

CIRNAC recommended that the impacts of abstracting water from Lower Landing Lake at the proposed rates on flow in the Char River be discussed during the technical review, and deferred to Fisheries and Oceans Canada's expertise on the subject. This concern was addressed by Department of Fisheries and Oceans. In their Completeness Review of the application (2020, pg 1), Department of Fisheries and Oceans stated that they are, "... of the view that this proposal is not likely to result in the contravention of the above mentioned prohibitions and requirements." CIRNAC considers this concern resolved

Water pumping plan

In their application, GN-CGS requested:

... to discontinue to submit a water pumping adaptive management plan for the pumping of water to Nipissar Lake from Lower Landing Lake. Due to this occurring from the lake and not a seasonally flowing river, the means to omit this from the future licence is asked to be strongly considered.

CIRNAC agrees that it may no longer be necessary to update the Water Pumping Adaptive Management Plan annually, as required by Part C, Item 6 of the current water licence, given the more permanent intake installation in Lower Landing Lake. Moving the re-supply pipeline intake from Char River to Lower Landing Lake involves an extension



of the pipeline by approximately 200m and a river crossing. The plan should be amended to reflect the new pumping location.

Table 4:

Recommendation No.	Concern	Status
3	Update the Water Pumping Plan to reflect the new pumping location	Resolved – Follow-Up required by NWB

CIRNAC recommended that GN-CGS provide an updated Water Pumping Plan which reflects the proposed pumping location at Lower Landing Lake. CIRNAC recommended that the plan include erosion prevention measures, if necessary. GN-CGS has committed to providing an updated Water Pumping Plan within a year of issuance of an amended licence. This addresses CIRNAC's concern and the comment is resolved. CIRNAC requests that this commitment be captured in an amended licence.

Term of amended licence

In their application, GN-CGS requested that the amendment be used to renew the licence for a 10 year term, until 2031. In our Technical Review submission on December 7, 2020, CIRNAC expressed the concern that there is only primary treatment for sewage with waste being discharged to the environment. CIRNAC recommended the addition of a condition in a renewed licence to report on progress towards upgrading wastewater treatment, with explanations for deviations from the tentative schedule.

Table 5:

Recommendation No.	Concern	Status
		Resolved -
7	CIRNAC supports 10 year term of licence with commitments	Follow-Up
·	to upgrade wastewater treatment	required by
		NWB

GN-CGS provided a tentative timeline for the upgrade of the wastewater treatment plant in their Response to Technical Comments submitted on December 16, 2020. With a commitment to update the wastewater treatment plan this concern is resolved. CIRNAC supports the applicant's licence term extension request and requests that this commitment be captured in an amended licence.

Water Quantity and Timing of Pumping

Timing of pumping from Lower Landing Lake

In the amendment application, GN-CGS requested authorization to withdraw "10,000 m³/day pumped from Lower Landing Lake to Nipissar Lake between July and August".



The annual and quarterly reports for five of the last six years state that the onset of water pumping from Char River/Lower Landing Lake occurred in June.

The Water Balance Assessment indicates highest flows are at freshet, which typically occurs in June. The median historic thaw date is June 8, and is predicted to occur earlier as the climate changes. Pumping soon after thaw at freshet would have the least proportional impact on flows in Char River. It was unclear why GN-CGS requested to restrict the pumping period from Lower Landing Lake.

Table 6:

Recommendation No.	Concern	Status
2	Timing of pumping	Resolved

CIRNAC requested that GN-CGS clarify the period for which pumping is being requested. GN-CGS has clarified their intention is to pump during the full open water season. This concern is resolved.

Construction of New Facilities

CIRNAC found the amendment application unclear about what work occurs for the installation of the water withdrawal pipeline each year. According to the Diagram of pipeline extension document submitted with the application, a 20m span of pipe suspended across Char River will be installed seasonally, yet the applicant's reply to technical comments stated that the steel carrier pipe is in place and not being moved. CIRNAC requested clarification on what construction activities are involved in the seasonal installation. In technical comment number 3, regarding the Water Pumping Plan, CIRNAC recommended that an updated Water Pumping Plan include what measures will be taken to prevent sediment from entering water during pipeline installation and de-installation over the river each year, and what monitoring is planned to confirm the effectiveness of the erosion prevention measures taken.

Table 7:

Recommendation No.	Concern	Status
		Resolved -
3	Erosion prevention measures for seasonal pipe installation and de-installation	Follow-Up required by
		NWB

During the Technical Meeting, GN-CGS clarified that a permanent structure had been constructed over the river which would act as a casing for the flexible piping, and that no construction would occur seasonally. Instead, the flexible pipe will be threaded through the permanent steel carrier pipe and then withdrawn at the end of the season. This resolves CIRNAC concern.



Compliance History

Quarterly reporting

Under Part B, Item 2 of the current licence No. 3AM-GRA1624, GN-CGS is required to submit a quarterly report to the NWB for all monitoring and all studies conducted during each Calendar Quarter. Reports are to contain the following information:

- a. Tabular summaries of all data generated under the Monitoring Program;
- b. Monthly quantities of fresh Water obtained from all sources;
- c. Quarterly sampling results from Monitoring Program Station GRA-3;
- d. Current estimated volume of Nipissar Lake based on Water elevation determined at Monitoring Program Station GRA-5; and
- e. An executive summary of any studies conducted to date during the Calendar Quarter, pending completion.

This requirement was written into the water licence on the basis of a *Fisheries Act* Direction set by the Department of Environment and Climate Change Canada (ECCC) on April 6, 2017, and a recommendation for quarterly reporting during the Public Hearing for the 3AM-GRA1015 renewal application in 2016 (NWB Public Hearing Transcript, 2016) to address outstanding issues with the quality of the marine discharge and the monitoring of the discharges.

Table 8:

Recommendation No.	Concern	Status
6	Reduction of reporting frequency from quarterly to annually in annual reports	Resolved

With their amendment application, GN-CGS have requested to remove the requirement to provide quarterly reports from their water licence, and to submit only annual reports. CIRNAC supports this request. E-mail correspondence between CIRNAC and ECCC on November 26, 2021, was provided to the NWB on March 1, 2021, as confirmation that the 2017 Direction has been completed, and that CIRNAC and ECCC agree that quarterly reporting is no longer necessary. CIRNAC agrees that the removal of the quarterly reporting requirement from an amended licence, and maintaining annual reports, would be acceptable.

Monitoring Program

Modifications to monitoring program

GN-CGS requested in their application "to remove compliance point GRA-6 (Char River) from the water licence as this is no longer where water is pumped from to Nipissar Lake via pipeline to assist in keeping lake levels high enough to support municipal consumption."



The three water source monitoring program stations (MPS) are as follows:

- GRA-5: Water level gauge in Nipissar Lake to be monitored monthly during periods of open water;
- GRA-6: Char River Water pumped to Nipissar Lake to be monitored daily for water volume and monthly during spring freshet for water quality; and
- GRA-7: Lower Landing Lake to be monitored annually during spring freshet for water quality.

Station GRA-6 is just upstream from where the pipeline is suspended across Char River and GRA-7 is next to the pipeline intake on Lower Landing Lake. The water licence monitoring program has been adapted for pumping from Char River, and CIRNAC noted that it could benefit from changes should the pumping location be changed to Lower Landing Lake.

CIRNAC's Technical Comments submitted on December 7, 2020, expressed concern that although there would no longer be pumping from Char River following the proposed amendment, there is still the potential for impact on Char River which should be monitored. Specifically, CIRNAC noted that the quantity of water abstracted from the Lower Landing Lake/Char River watershed is still of interest, even though the pumping location would change, that water quality could be impacted during seasonal pipeline installation and de-installation activities, and that water flow could be impacted from withdrawals to Lower Landing Lake, the river's source.

CIRNAC recommended that an amended water licence reduce requirements at station GRA-6 to those parameters typically measured during construction activities and limited to periods when work is occurring (Recommendation 4.1), and making modifications to monitoring requirements at station GRA-7 for potential impacts of Lower Landing Lake water withdrawal on Char River flow (Recommendation 4.2).

Table 9:

Recommendation No.	Concern	Status
4.1; 4.2	Monitoring program should be adapted to new pumping location	Resolved

During the Technical Meeting, CIRNAC and GN-CGS agreed to commitments for monitoring water quality and water level at station GRA-7, and discussed the removal of monitoring requirements for station GRA-6. This resolved CIRNAC's Recommendation 4.2.

During the Pre-Hearing Conference, CIRNAC requested that GN-CGS provide the rationale for the removal of requirements of station GRA-6. GN-CGS submitted a technical memorandum on March 1, 2020, as requested, which contained the rationale that this compliance point is no longer informative because its purpose was to monitor water quality at the pumping location which has been removed. GN-CGS further points out that historical water quality sampling has shown that chemical parameters between Lower Landing Lake, Char River and Nipissar Lake are similar, and that the pumping equipment at this location was a removable pump and hose, which has already been



moved to Lower Landing Lake without impact to the riverbanks. With this rationale, Recommendation 4.1 is resolved.

Environmental Monitoring Program and Quality Assurance / Quality Control Plan

Part H of water licence 3AM-GRA1624 indicates that the Environmental Monitoring Program and Quality Assurance / Quality Control Plan is to be reviewed annually and updated as required. The most recent version of the plan was developed in 2008 and revised in 2010. CIRNAC provided one information request on October 27, 2020, recommending an updated plan be submitted for review, which should include the following information:

- the population of the Hamlet of Rankin Inlet;
- the name CIRNAC;
- any updates with the water source;
- monitoring that will be conducted under the new water licence; and
- reference to the current water licence.

Table 10:

Information Request No.	Concern	Status
1	Update Environmental Monitoring Program and Quality Assurance / Quality Control Plan	Resolved

GN-CGS responded to the information request on October 27, 2020 and committed to providing an update by March 1, 2021. GN-CGS provided an updated Environmental Monitoring Program and Quality Assurance / Quality Control Plan to the NWB on May 20, 2021. CIRNAC considers this concern resolved, and intends to review the content of the plan as part of the 2020 Annual Report review.

Closure and Reclamation Planning

Reclamation plans for old intake

Reclaiming old facilities is necessary when they are replaced by new ones. CIRNAC was unable to find any information in the application regarding what would happen to the old water intake in Char River, and wanted to ensure that the old water intake in Char River was removed.

Table 11:

Recommendation No.	Concern	Status
5	Removal of the old water intake in Char River	Resolved



CIRNAC recommended the applicant provide a description of what they planned to do with the old water intake on Char River, and that an amended licence require a reclamation plan be provided. GN-CGS responded to information requests on December 21, 2020, and confirmed that this work had already been completed. A CIRNAC Inspector has confirmed the work is completed. CIRNAC no longer finds it necessary to submit a reclamation plan for the site and considers this comment resolved.

CONCLUSION

CIRNAC supports the changes proposed in the application for amendment and renewal of water licence 3AM-GRA1624, submitted by GN-CGS. CIRNAC's technical comments have been addressed. Our follow-up recommendations are:

- 1) for the NWB to ensure that GN-CGS's commitments to submit a Water Pumping Plan within a year of issuance of an amended licence, and to update the wastewater treatment plant, are captured in an amended licence, and
- 2) to include the updated Environmental Monitoring Program and Quality Assurance / Quality Control Plan as part of the 2020 Annual Report review.



REFERENCES

- Annual & Quarterly Reports for the Hamlet of Rankin Inlet, Government of Nunavut Community and Government Services. 2015-2020.
- B. Summerfield, ECCC, NWB Public Hearing File No.: 3AM-GRA1015, Transcript, March 16, 2016, Volume 1, pp. 56 -57.
- Department of Fisheries and Oceans. Letter to the Nunavut Water Board Re: Rankin Inlet Utilidor Community & Government Services Amendment Application for water licence 3AM-GRA1624. File No. 20-HCAA-02413. December 7, 2020.
- Environment and Climate Change Canada, RE: Fisheries Act Direction, Nemisis File 4408-2016-06-28-001, April 6, 2017.
- E-mail correspondence between CIRNAC and ECCC. RE: question about Rankin Inlet (3AM-GRA1624) water licence amendment. November 26, 2021. Provided to the NWB on March 1, 2021.
- Nunavut Water Board Water Licence No: 3AM-GRA1624, Nunavut Water Board, May 2, 2016.
- Nunavut Water Board. Type "A" Water Licence Pre-Hearing Conference Decision Regarding an Application to Amend Water Licence No: 3AM-GRA1624. March 25, 2021.

