

**Table 1**  
**City of Iqaluit Water Licence Renewal/Amendment Application**  
**Response to Initial Information Requests**

Agency	Comment ID	Subject	Comment	Recommendation	Response	Reference/Attachment
CIRNAC	2026-02-06-IR#01	Plans/Procedures/Reports for Existing Infrastructure under Licence	Section 3-25 of the Nunavut Water Board (NWB) Municipal Supplemental Information Guideline (251231 3AM-IQA1626 251223-3AM-IQA---- Attach-04-SIG-Concordance-IMLE) requires the Applicant to provide a timetable for the filing of all appropriate plans and procedures. The City's response in column H of section 3-25 of the Supplemental Information Guideline (SIG) refers to section 1.4 of the reference document (251223-3AM-IQA---- Applic-Main-Doc-IMLE). Section 1.4 of the reference document outlines the amendments to the licence but does not reference the updated plans, designs, or reports and does not provide a timetable for filing the updated plans and procedures. NWB Guide 7 – Licensee Requirements following the Issuance of a Water Licence, Part 2, Section 9, states that "the licensee must also submit updated plans including designs and reports if plans on the public registry are over three (3) years old or outdated." The Application does not include a submission of plans and procedures for the infrastructure under the existing licence for review. Most of the documents included are for the Long Term Water Project (LTWP).	CIRNAC recommends that the City provide the following information in accordance with section 3-25 of the Supplemental Information Guideline (SIG) and Guide 7: IR-01a) A list of relevant and current plans/reports /procedures for the existing infrastructure under the licence, and location of documents available for review. IR-01b) A timetable for filing updated plans and procedures that are not provided with the application. IR-01c) An update the response to section 3-25 of the SIG.	<b>IR-01a:</b> The management plans required under the licence have been reviewed, and these plans are listed in Section 8 and have been appended to the revised Application. Several plans warranted updates and were updated in the past month. Exceptions include those plans associated with the new North Landfill and Waste Transfer Station, as these facilities have been constructed but not yet commissioned, and the Wastewater Treatment Plant O&M Manual, since that facility has not had any updates since the manual was produced with the commissioning of the facility in 2020. <b>IR-01b:</b> The City will need to review each of its plans and amend them as required to reflect changes to terms and conditions in the new licence, once issued. Updates to the plans and manuals for the new North Landfill and WTS will be completed once these facilities have been commissioned and some operating history has been gained. These timelines are noted in Section 8 of the Application. <b>IR-01c:</b> Section 3-25 of the SIG has been updated in the revised Application.	Section 8
CIRNAC	2026-02-06-IR#02	Potential Effect of Water Use and Waste Disposal on Groundwater and Surface Water Quality	Section 3-27 of the SIG requires the Application to identify the potential effect of water use and waste disposal on surface water and groundwater quality, and section 6-5 of the SIG requires the Application to provide a description of the water quality of the water from the source for each season. Surface water and groundwater baseline conditions as well as potential effects are summarized in the Physical, Biological and Socioeconomic Screening Report (251223-3AM-IQA---- Attach-29-Env-Screening-Rpt-IMLE) but are specific to the LTWP. There is no baseline data provided for water sources being used as part of current operations or consideration of the potential effects on surface water and groundwater from current water use and waste disposal activities, which are expected to continue with the addition of the LTWP. The sampling provided in Table 2-6 of the Physical, Biological and Socioeconomic Screening Report provides water quality summary data that are used in an ecological context but did not include parameters related to contaminants. Water quality should include parameters related to contaminants.	CIRNAC recommends that the City provide the following information in accordance with sections 3-27 and 6-5 of the SIG: IR-02a) Baseline water quality data (i.e., for each water source and season). IR-02b) Identification of the potential effects from water use (from current sources as well as LTWP) and waste disposal on surface water and groundwater quality. IR-02c) Updated responses to section 3-27 of the SIG.	<b>IR-02a:</b> Baseline water quality for Lake Qikiqtalik is presented in Attachment 35. The in-situ water quality measurements presented in the Physical, Biological and Socioeconomic Screening Report (Attachment 36) is the only water quality data that has been collected for the Apex River. <b>IR-02b:</b> Section 3-27 of the SIG requires the proponent to identify the potential effects of water use and waste disposal on groundwater and surface water; land; vegetation; and aquatic ecosystems. The effects of existing facilities are not typically addressed during relicensing and this item of the SIG is for proposed facilities. This information is provided for the LTWP. The potential effects of water use are primarily flow-related impacts on fish and fish habitat. Lake Geraldine is a man-made reservoir and available data suggests that there may not be fish within Lake Geraldine (Numami Stantec, 2017). The main effects would have been during its construction several decades ago. The changes in flow for Lake Qikiqtalik and Apex River are described in Attachments 34 and 37, and the effects from this are described in Attachment 36 as well as Section 3.32 of the Application. Waste disposal facilities were licensed previously, the North 40 Landfill and Waste Transfer Station were subject to a NIRB screening and Amendment No. 5 of the water licence in 2021. The West 40 Landfill is nearing the end of its life, and the City expects to close the landfill within the next three years. A closure plan will be filed with the NWB and will be subject for review at least a year before that occurs. The WWTP and sewage lagoon have also been in place for many years. For existing facilities, which have all been operating for decades, the potential effects are best described by recent monitoring. <b>IR-02c:</b> Section 3-27 of the SIG has been updated.	Attachment 34 - Lake Qikiqtalik Water Withdrawal Study Attachment 35 - Lake Qikiqtalik Water Quality Report Attachment 37 - Apex River Water Withdrawal Study Attachment 36 - Physical, Biological and Socioeconomic Screening Report
CIRNAC	2026-02-06-IR#03	Potential Effect of Water Use on Groundwater and Surface Water Quantity	Section 3-27 of the SIG requires the Application to identify the potential effect of water use and waste disposal on surface water and groundwater quantity. The Desktop Study of Discharge in Apex River (Document 251231 3AM-IQA1626 251223-3AM-IQA----Attach-33-Apex-River-Water-Withdrawal-Study-IMLE) provides a quantitative supply analysis and states that a targeted hydrological assessment is needed to determine precise licensing requirements. No such study has been completed. The Apex River Water Withdrawal Study provides hydrologic analysis, flow modelling, synthetic datasets, withdrawal scenarios, and capacity assessments, but it does not adequately identify the potential effects of water withdrawal on the Apex River itself—particularly hydrological or environmental effects. The Physical, Biological and Socioeconomic Screening Report (Document 251231 3AM-IQA1626 251223-3AM-IQA---- Attach-29-Env-Screening-Rpt-IMLE) states the following: "Continuous water withdrawal and conveyance could affect the seasonal and long-term water levels in Lake Qikiqtalik and the Nuaqungut (Apex) River." However, the Screening Report does not qualify or quantify those effects and, therefore, it is not clear whether the proposed mitigation measures will be effective to avoid effects of water withdrawal on surface water quantity.	CIRNAC recommends that the City provide the following information in accordance with section 3-27 of the SIG: IR-03a) Hydrological water balance assessment to assess impacts on flow rates, water levels, and seasonal hydrological variation from the proposed water withdrawals at Lake Qikiqtalik and the Apex River. IR-03b) Qualitative and quantitative description of the potential effects from water use (from current sources as well as LTWP) on surface water and groundwater quantity. IR-03c) Updated responses to section 3-27 of the SIG.	<b>IR-03a:</b> The original water balance for Lake Geraldine and an update to the water balance are provided as Attachments 12 and 13. Impacts on flow rates and water levels are considered in Section 3.3.2 of the Application and in Attachments 34, 36 and 37. <b>IR-03b:</b> An additional discussion on effects has been added to Section 3.3.2 of the Application. <b>IR-03c:</b> Section 3-27 of the SIG has been updated.	Attachment 12 - LG Water Balance Attachment 13 - LG Water Balance Update Attachment 34 - Lake Qikiqtalik Water Withdrawal Study Attachment 36 - Physical, Biological and Socioeconomic Screening Report Attachment 37 - Apex River Water Withdrawal Study
CIRNAC	2026-02-06-IR#04	Potential Effect of Water Use and Waste Disposal on Soil Contamination	Section 3-27 of the SIG requires the Application to identify the potential effect of water use and waste disposal on soil contamination. Soil baseline conditions are presented in the Enhanced Phase I Environmental Site Assessment (Document 251231 3AM-IQA1626 251223-3AM-IQA---- Attach-35-Phase-I-ESA-IMLE) and potential effects are summarized in the Physical, Biological and Socioeconomic Screening Report (Document 251231 3AM-IQA1626 251223-3AM-IQA----Attach-29-Env-Screening-Rpt-IMLE), but both documents are specific to the Long Term Water Project (LTWP). There is no baseline data provided for soil in the footprint of existing facilities or consideration of the potential effects on soil from current water use and waste disposal activities, which are expected to continue with the addition of the LTWP.	CIRNAC recommends that the City provide the following information in accordance with section 3-27 of the SIG: IR-04a) Baseline soil quality data associated with the footprint of existing facilities. IR-04b) Identification of the potential effects from water use (from current sources as well as LTWP) and waste disposal on soil quality. IR-04c) Updated responses to section 3-27 of the SIG.	<b>IR-04a:</b> The cited requirement of the SIG applies to new facilities. There are no plans to obtain soil quality data for existing facilities that have been operating under a water licence for decades. <b>IR-04b:</b> The effects from water use and waste disposal using current facilities will not be assessed, as these facilities already exist. <b>IR-04c:</b> As mentioned above, the cited requirement of the SIG applies to new facilities.	
CIRNAC	2026-02-06-IR#05	Studies and Designs: Site Specific Data and Analysis to Support the Design and Management Decisions - Geotechnical	Section 3-49 of the SIG requires the Application to provide site specific data and analysis to support the design and decisions made, particularly in regards to new infrastructure or processes. Section 5.7.1 in the Preliminary Design Report Long Term Water Program – Supply and Storage refers to design decisions that were made "based on recommendations of section 10 of the Geotechnical Report". There is no section 10 in the geotechnical report that was provided with the application: 251231 3AM-IQA1626 251223-3AM-IQA---- Attach-27-Geotech-Report-Reservoir&Pipeline-Crossing-IMLE. The geotechnical report upon which design decisions were based on are required to review the basis of such decisions.	CIRNAC recommends that the City provide the geotechnical report that includes the recommendations referred to in the preliminary design report, in accordance with section 3-49 of the SIG.	The recommendations cited in the Preliminary Design Report are those found in Section 6 (PDF page 32) of the Arcadis geotechnical report (Attachment 38) and in the report by Adaptive Baseline Geotechnical Ltd. presented in Appendix H of Arcadis's geotechnical report (PDF page 288).	Attachment 38 - Geotechnical Report
CIRNAC	2026-02-06-IR#06	Studies and Designs: Site Specific Data and Analysis to Support the Design and Management Decisions - Geotechnical Missing Appendices	Section 3-49 of the SIG requires the Application to provide site specific data and analysis to support the design and management decisions made. City of Iqaluit, Preliminary Geotechnical Investigation Report – DRAFT, Long Term Water Program – Supply and Storage, Iqaluit, Nunavut (Attach-27-Geotech-Report-Reservoir&Pipeline-Crossing) is missing the identified appendices. The geotechnical reports upon which design decisions were based are required to review the basis of such decisions.	CIRNAC recommends that the City provide the missing Appendices to the geotechnical report, in accordance with section 3-49 of the SIG.	The version of this report with appendices is provided as Attachment 38.	Attachment 38 - Geotechnical Report
CIRNAC	2026-02-06-IR#07	Studies and Designs: Site Specific Data and Analysis to Support the Design and Management Decisions - Dam Safety Review	Section 3-49 of the SIG requires the Application to provide site specific data and analysis to support the design and management decisions made. The proposed dam structures for the new reservoir do not have a dam break analysis completed and the new structures introduce a cascade failure scenario for the Lake Geraldine Dam structure. It is required that all relevant approved facilities are designed and constructed to engineering standards such that, at a minimum, they comply with the most current version of the Canadian Dam Safety Guidelines.	CIRNAC recommends that the City provide a dam break analysis of the proposed reservoir structures and assess the impact of cascade failure on the Lake Geraldine Dam structure as part of this application, in accordance with section 3-49 of the SIG and the most current version of the Canadian Dam Safety Guidelines.	Dam break analyses are currently underway, and are being performed in accordance with the latest CDA guidelines. A copy of the report will be provided Summer 2026. However, a 2011 Dam Breach Analysis completed for Lake Geraldine provides some relevant information, since a dam breach at the new reservoir would discharge into Lake Geraldine (Attachment 9). In the absence of an updated dam breach assessment of this scenario, the flow path of a release of water from Lake Geraldine would look similar, but the duration of the flood would likely be longer.	Attachment 9 - Lake Geraldine Dam Break Analysis
CIRNAC	2026-02-06-IR#08	Studies and Designs: Site Specific Data and Analysis to Support the Design and Management Decisions - Water Balance	Section 3-49 of the SIG requires the Application to provide site specific data and analysis to support the design and management decisions made. The application does not have an updated Lake Geraldine Water Balance Model completed with the most up to date data available. An updated water balance model is required under the current licence 30 days prior to the start of water withdrawals and no water balance model has been submitted since new bathymetric data of Lake Geraldine was captured. During review of the City's 2024 Annual Report for Water Licence No: 3AM-IQA1626, CIRNAC had recommended that the City provide an updated and recalibrated Lake Geraldine Water Balance Model to address the new bathymetric survey data collected in 2024 and the updated metrological information. The updated Lake Geraldine Water Balance Model was to be submitted with the renewal Application.	CIRNAC recommends that the City provide an updated Lake Geraldine Water Balance Model, in accordance with section 3-49 of the SIG and previous recommendations.	The original Lake Geraldine Water Balance Model and updates are provided as Attachments 12 and 13.	Attachment 12 - Lake Geraldine Water Balance Attachment 13 - Lake Geraldine Water Balance Update
CIRNAC	2026-02-06-IR#09	Annual Reporting	Section 3-55 of the SIG requires the Application to provide detailed information regarding the content of annual reports and a proposed outline or template of the annual report. The annual report should include the following: • Comparison of water quality and quantity monitoring data with the water quality and quantity predictions presented in the application; and • A description of how any conditions in the NIRB screening decision related to the NWB mandate have been implemented. The City has provided their Water Licence 3AM-IQA1626 2024 Annual Water License Report (2024 Annual Report) as a template. The annual report template provided does not meet the requirements for the Water Licence application as outlined in section 3-55 of the SIG. • The 2024 Annual Report includes a comparison of the water quantity to the licence allowance but does not provide a comparison of the water quality to predicted water quality. Justification for not including it was provided as "Comparison to predictions not completed". • The 2024 Annual Report does not include a section to describe how any conditions in the NIRB screening decision related to the NWB mandate have been implemented.	CIRNAC recommends the City provide the following information in accordance with section 3-55 of the SIG: IR-09a) A revised Annual Report template that includes (i) a section for comparing water quality data to predictions and (ii) a section to describe how any conditions related to the NIRB have been implemented. IR-09b) Updated responses to section 3-55 of the SIG.	<b>IR-09a (i):</b> Monitoring data from 2025 was presented in Appendix A of the 2025 Annual Report. The City proposes to present future monitoring data in a similar way in future annual reports. No water quality or quantity predictions were presented in a previous Application. Hence, a comparison is not possible. <b>IR-09a (ii)</b> SIG Section 3-55 asks the proponent to describe how any conditions in the NIRB screening decision related to the NIRB mandate have been implemented. Below is a summary regarding the 2014 screening decision report (NIRB File No. 13UN034): Water use: fish screens are used on all intakes (Term #5), and the City has sought permission from the NWB before extracting water from new sources (Term #6). Landfill operations: Only non-hazardous wastes are accepted at the West 40 Landfill, and hazardous materials are shipped south for disposal at licensed facilities (Term #13). Fencing is maintained around the landfill (Term #14). Dust suppression measures are applied where appropriate (Term #15). Personnel are trained before working at the landfill, and are trained regarding key operational guidelines and commitments (Term #16). The landfill boundaries are clearly identified with the fencing (Term #17). Natural drainage is unobstructed at the landfill (Term #18). Silt fences are installed downgradient of construction activities (Term #19). An undisturbed buffer is maintained between the landfill and high water mark of the nearest waterbody, which is Koojessie Inlet (Term #20). Excess overburden/topsoil generated during construction is stockpiled if not used for other purposes (Term #21). However, re-vegetation is not normally done at disturbed areas. <b>IR-09b:</b> Section 3-55 of the SIG has been updated to refer to the applicable sections of the 2025 Annual Report, and this IR response which will be attached to the revised application.	

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CIRNAC	2026-02-06-IR#10	Compliance Assessment	<p>Section 3-57 of the SIG requires the Application for a renewal or amendment of an existing licence to provide a compliance assessment/status report. This report must document the status of compliance for each condition of the existing water licence taking into consideration inspector dialogues and inspector directions, responses to inspector dialogues and inspector directions, spills that may have occurred, and any reporting requirements. The report must indicate when facilities were inspected by regulatory agencies and list any spills that may have occurred including a description, location shown on a map, and the action taken to address the affected area.</p> <p>The Compliance Assessment Report (251231-3AM-IQA1626-251223-3AM-IQA---- Attach-07-Compliance-Assessment-IMLE) provided with the Application consists of three documents: 1) the City's 2024 Annual Report, 2) a July 2025 Water Licence Inspection Report by CIRNAC, and 3) the City's 2024 Water Licence Inspection Report – Compliance Assessment Status in response to CIRNAC's July 2025 Water Licence Inspection Report.</p> <p>The Compliance Assessment Report provides the 2024 annual report submitted by the City to comply with Water Licence 3AM-IQA1626 Schedule B Annual Reporting Requirements and the status of three non-compliance items identified in July 2025. Water Licence 3AM-IQA1626 contains 90 conditions in Parts B through J of the Licence. The Compliance Assessment Report provided with the Application does not address each of the Licence conditions.</p> <p>Through review of the City's annual reporting on Water Licence 3AM-IQA1626, CIRNAC has raised multiple concerns and compliance issues. CIRNAC has repeated comments to the City about the following:</p> <ul style="list-style-type: none"> <li>• Unresolved deficiencies identified in Dam Safety Reviews (DSR) and Inspections (DSI), such as instrumentation data collection, repairs, and installation of monitoring equipment</li> <li>• Missing or incomplete sampling data, lack of compliance with Schedule I of the Water Licence, and recommendations for improved reporting of sampling locations, frequency, and analyses</li> <li>• Quantification and reporting on the volume of spills, with several years of incomplete data</li> <li>• Additional information on the maintenance and construction activities reported</li> <li>• Updated operation and maintenance manuals</li> <li>• Confirmation of hazardous waste management practices, including which wastes remain on-site, how contaminated materials are handled, and records of proper disposal</li> <li>• Updated schedules and submission of technical studies, such as the Lake Geraldine Water Balance Model</li> <li>• Updates on the Closure and Reclamation Plan for the West 40 Landfill</li> </ul> <p>The Compliance Assessment Report does not address the issues identified by CIRNAC through the Annual Report reviews.</p>	CIRNAC recommends the City provide a revised compliance assessment/status report that complies with section 3-57 of the SIG and addresses previously identified compliance issues. Please see attachment A of Appendix A for the most up to date license terms.	An updated Compliance Assessment that reviews the City's performance regarding the individual terms of the licence (including amendment) is presented as Attachment 7.	Attachment 7 - Compliance Assessment
CIRNAC	2026-02-06-IR#11	Existing Water Intake	<p>Section 6-8 of the SIG requires the Application to provide a description of the water intake method(s) including the intake facility. The reference document (251223-3AM-IQA---- Attach-09-LTWP-Prelim-Design-Rpt-IMLE) includes a description of the proposed intakes as part of the LTWP but does not provide a description of the existing infrastructure.</p>	CIRNAC recommends that the City provide description of the existing water intake infrastructure and update the response to section 6-8 of the SIG.	A description of the intake is provided in Section 3.1 and a technical report describing its current condition with conceptual plans for its replacement in 2026 is provided as Attachment 10.	Attachment 10 - Lake Geraldine Intake Replacement Conceptual Design
CIRNAC	2026-02-06-IR#12	Existing Water Intake Condition	<p>Section 6-9 of the SIG requires the Application to provide a description of the general condition of any existing water intake facility. Rate the condition of the facility as satisfactory or unsatisfactory and explain the rating.</p> <p>The reference document (251223-3AM-IQA---- Attach-09-LTWP-Prelim-Design-Rpt-IMLE) includes a description of the proposed intakes as part of the LTWP but does not provide a description of the existing infrastructure or rating.</p>	CIRNAC recommends that the City provide a description of the condition of the existing water intake infrastructure and update the response to section 6-9 of the SIG.	A technical report describing the condition of the existing water intake is provided as Attachment 10.	Attachment 10 - Lake Geraldine Intake Replacement Conceptual Design
CIRNAC	2026-02-06-IR#13	Water Storage	<p>Sections 6-15 through 6-19 of the SIG require the Application to provide details on the water storage facilities including the type, location, design and the water storage volume.</p> <p>For sections 6-15 through 6-18 of the SIG, documentation is focused on the LTWP and does not provide details of the existing facilities. Section 6-19 of the SIG does provide reference to the existing raw water storage but does not include the storage capacity at the water treatment plant.</p>	CIRNAC recommends that the City provide the required documentation for the existing infrastructure and update the response to sections 6-15 through 6-19 of the SIG.	The Lake Geraldine Dam is described in a recent dam safety review (Attachment 8). The Lake Geraldine Water Intake is described in a condition assessment and conceptual design for its replacement, in Attachment 10. The Water Treatment Plant is described in its O&M Manual (Attachment 11).	Attachment 8 - Lake Geraldine Dam Safety Review Attachment 10 - Lake Geraldine Intake Replacement Conceptual Design Attachment 11 - Water Treatment Plant O&M Manual
CIRNAC	2026-02-06-IR#14	Waste Disposal	<p>Sections 7-1 (parts a through j) of the SIG require that the Applicant provide a detailed description of all types of waste and all forms of waste disposal.</p> <p>The City's response to sections 7-1 of the SIG refers to section 4.3 of the reference document (251223-3AM-IQA---- Applic-Main-Doc-IMLE), but that appears to be a typo as there is no section 4.3 in the report. Section 4.2 of the reference document provides a summary of the waste anticipated to be generated through the LTWP but does not provide details on the existing system.</p>	CIRNAC recommends that the City provide the required descriptions of all types of waste and waste disposal under the licence, including the existing waste facilities (i.e., West 40 and North 40 Landfills) and wastewater treatment systems and update the response to section 7-1 of the SIG.	A description of existing water supply facilities is provided in Section 3.1, supported by Attachments 8, 10 and 11. Information on existing sewage disposal facilities is provided in Section 4.1 and Attachments 43, 44 and 45. Information on existing solid waste management facilities is provided in Section 4.2 and with Attachments 46 through 52.	Attachment 8 - Lake Geraldine Dam Safety Review Attachment 10 - Lake Geraldine Intake Replacement Conceptual Design Attachment 11 - Water Treatment Plant O&M Manual Attachment 43 - Wastewater Treatment Plant O&M Manuals Attachment 44 - WWTP Draft Control Narrative Attachment 45 - Sewage Lagoon O&M Manual Attachment 46 - Solid Waste Management Plan Attachment 47 - West 40 Landfill O&M Manual Attachment 48 - West 40 Decommissioning Technical Memorandum Attachment 49 - North 40 Landfill Construction Summary Report Attachment 50 - Waste Transfer Station Construction Summary Report Attachment 51 - North 40 Landfill and Waste Transfer Station O&M Manual Attachment 52 - North 40 Landfill Leachate Collection and Characterization Plan
CIRNAC	2026-02-06-IR#15	Waste Disposal: Quality and Quantity	<p>Sections 7-2, 7-3, and 7-4 of the SIG require that the Applicant provide details on the quality and quantity of waste generated; location, rate, timing, frequency, and duration of deposits; the methods and processes for handling (collecting, storing, treating, and discharging) waste; the capacity of waste facilities; and a description of measures to minimize the production of wastes.</p> <p>The application from the City indicates that the information required in sections 7-2 through 7-4 of the SIG is not applicable as no changes to the existing facilities are proposed. From Guide 7 – Licensee Requirements following the Issuance of a Water Licence, Part 2, Section 3, "Even if information in respect of an SIG(s) was provided upon application for the original licence, the Board requires the licensee to submit updated information addressing the SIG. Legislation, policies, best management practices and the information needs of both the Board and other parties may all change over time. Requirements and plans that were previously accepted may no longer reflect current conditions."</p> <p>The response provided indicates that there are no changes to the existing infrastructure but does not provide any details of the existing facilities. The City's response to sections 7-2 through 7-4 of the SIG refer to section 4.3 of the reference document (251223-3AM-IQA---- Applic-Main-Doc-IMLE), but there is no section 4.3 in the report. The reference document does not provide the details requested.</p>	CIRNAC recommends that the City provide the required descriptions of all types of waste and waste disposal under the licence, including the existing waste facilities to comply with items 7-2, 7-3 and 7-4 and update the response to these sections of the SIG.	Information on existing solid waste management facilities including the quantity of solid waste disposed of in the landfill in 2025 is provided in Section 4.2. The types of waste and waste disposal methods are described in the West 40 Landfill O&M Manual (Attachment 47). Additional information on the solid waste disposal facilities is provided in Attachments 46 through 52.	Attachment 46 - Solid Waste Management Plan Attachment 47 - West 40 Landfill O&M Manual Attachment 48 - West 40 Decommissioning Technical Memorandum Attachment 49 - North 40 Landfill Construction Summary Report Attachment 50 - Waste Transfer Station Construction Summary Report Attachment 51 - North 40 Landfill and Waste Transfer Station O&M Manual Attachment 52 - North 40 Landfill Leachate Collection and Characterization Plan
CIRNAC	2026-02-06-IR#16	Wastewater Including Sewage and Grey Water	<p>Sections 7-5 through 7-18 of the SIG require that the Applicant provide information on the wastewater treatment facilities.</p> <p>The application from the City indicates that the information required in sections 7-5 through 7-18 of the SIG is not applicable as no changes to the existing facilities are proposed. From Guide 7 – Licensee Requirements following the Issuance of a Water Licence, Part 2, Section 3, "Even if information in respect of an SIG(s) was provided upon application for the original licence, the Board requires the licensee to submit updated information addressing the SIG. Legislation, policies, best management practices and the information needs of both the Board and other parties may all change over time. Requirements and plans that were previously accepted may no longer reflect current conditions."</p> <p>The response does not provide any details on the existing infrastructure or references to applicable documents with the details.</p>	CIRNAC recommends that the City: IR-16a) Provide the required information on wastewater treatment facilities, including the existing wastewater treatment facilities. IR-16b) Update the response to sections 7-5 through 7-18 of the SIG.	An overview of the existing wastewater treatment facilities has been added to Section 4.1 of the Application. Additional detail on the wastewater treatment plant (WWTP) and sewage lagoon is provided in the respective operation and maintenance manuals presented as Attachments 43 and 45, and in the WWTP Upgrade Redesign Report for the recent upgrades (Attachment 44).	Attachment 43 - WWTP O&M Manual Attachment 44 - WWTP Redesign Development Report Attachment 45 - Sewage Lagoon O&M Manual
CIRNAC	2026-02-06-IR#17	Wastewater System Capacity	<p>Section 7-10 of the SIG requires that the Applicant indicate the capacity of the wastewater treatment facility.</p> <p>As stated in comment 16, above, the City's response in section 7-10 of the SIG does not provide details on the existing infrastructure or references to applicable documents with the details. It is unclear if the capacity of the wastewater treatment plant/sewage lagoon has been confirmed with the proposed increase in water use or if they would require upgrades to include additional capacity.</p>	CIRNAC recommends the City provide details on whether the wastewater system has capacity to meet the proposed increases in water use and update the response to section 7-10 of the SIG.	The current WWTP upgraded in 2020 is designed to meet the peak hour flow in 2041 (Attachment 44).	Attachment 44 - WWTP Redesign Development Report

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CIRNAC	2026-02-06-IR#18	Wastewater Treatment System	Section 7-19 of the SIG requires that the Applicant indicate whether there have been any operating problems with existing wastewater treatment facilities. The reference document is the 2024 Annual Report, which provides only a summary of the modifications that were completed, but does not describe the operating problems that are or were experienced at the facility. Section 7-20 of the SIG requires the Application to provide a description of the general condition of any existing wastewater collection system, discharge control system, dams, diversion dykes or berms and provide an explanation if unsatisfactory. The reference document section that is listed summarizes the dam inspection for the Lake Geraldine Dam, but does not provide details on the wastewater infrastructure.	CIRNAC recommends that the City provide the following required information in accordance with sections 7-19 and 7-20 of the SIG: IR-18a) Description of operating problems with the existing wastewater treatment facilities. IR-18b) Description of the general conditions of the existing wastewater treatment facilities (wastewater collection system, discharge control system, dams, diversion dykes or berms).	For the WWTP, this information was provided to CIRNAC in the City's quarterly report, "Iqaluit WWTP Upgrades Effluent and Water License Quarterly Report 2025-Q2-Q4, April 2025 - Dec 2025 for Inspector's direction," dated January 23, 2026. Information from the quarterly report has been incorporated into Section 4.1.1 of the Application. The sewage lagoon is currently not experiencing operating problems.  A description of the general condition of the WWTP and the sewage lagoon are provide in Section 4.1, with more detail on the sewage lagoon provided in the Sewage Lagoon O&M Manual (Attachment 45).	Attachment 45 - Sewage Lagoon O&M Manual
CIRNAC	2026-02-06-IR#19	Solid Waste Facilities	Sections 7-21 to 7-29 of the SIG requires that the Applicant provide information on the existing solid waste management facilities.  The application from the City indicates that the information required in sections 7-21, 7-22, 7-23, 7-24, 7-26, 7-27 and 7-28 of the SIG are not applicable as no changes to the existing facilities are proposed. From Guide 7 – Licensee Requirements following the Issuance of a Water Licence, Part 2, Section 3, "Even if information in respect of an SIG(s) was provided upon application for the original licence, the Board requires the licensee to submit updated information addressing the SIG. Legislation, policies, best management practices and the information needs of both the Board and other parties may all change over time. Requirements and plans that were previously accepted may no longer reflect current conditions."  The response does not provide any details on the existing infrastructure or references to applicable documents with the details.	CIRNAC recommends that the City provide: IR-19a) The required information on solid waste management facilities, and IR-19b) An updated response to sections 7-21 through 7-28 of the SIG.	Information on the existing solid waste management facilities is provided in Section 4.2 and in the various solid waste related management plans and manuals listed in Section 8.1 of the Application. These plans and manuals are appended to the Application (Table 8.1 identifies their location).	Attachment 46 - Solid Waste Management Plan Attachment 47 - West 40 Landfill O&M Manual Attachment 48 - West 40 Decommissioning Technical Memorandum Attachment 49 - North 40 Landfill Construction Summary Report Attachment 50 - Waste Transfer Station Construction Summary Report Attachment 51 - North 40 Landfill and Waste Transfer Station O&M Manual Attachment 52 - North 40 Landfill Leachate Collection and Characterization Plan
CIRNAC	2026-02-06-IR#20	Fuel and Chemical Storage	The Application notes that the City plans to construct new facilities over the period of mid-2026 to October 2029 and will require the development of several quarries, the operation of heavy equipment, storage and use of fuel, explosives, lubricating oils and greases for equipment maintenance. Section 4-1(o) of the SIG requires the Application to provide a complete description of the undertaking with detailed site plans including fuel and chemical storage. Sections 7-38 and 7-39 of the SIG require the Application to provide a description of the type and quantities of petroleum products, chemicals and/or hazardous materials to be disposed of and details on the handling and storage of hazardous or potentially hazardous materials.	CIRNAC recommends that the City provide the following information in accordance with sections 4-1(o), 7-38, and 7-39 of the SIG: IR-20a) Present the locations of storage facilities/areas on a site plan and indicate whether they are temporary or permanent . IR-20b) Submit an updated version of the City of Iqaluit Solid Waste Management Plan to include such management activities for hazardous wastes. IR-20c) Update the response to section 4-1(o), 7-38 and 7-39 of the SIG.	The current plan is to not store any fuel, chemical or hazardous materials on site with the exception of explosives which will be managed in accordance with the regulation pertaining to the use and management of explosives. At present it is anticipated the explosives will be stored near the former shooting range however that is to be confirmed by the Blast Master once the general contractor has been retained. Equipment fueling is expected to be done using a fuel truck that mobilizes to site as required and will be done in designated areas to be confirmed but will be appropriately set back from water bodies as required by the Board. Similarly, maintenance/service trucks will mobilize to site from local shops in Iqaluit on an as needed basis (re used of grease and oils for equipment). It is not anticipated that a maintenance shop will be set up on site; however, should that be necessary the Board will be advised at least 60 days prior to work. The documentation relating to the use of fuels and chemicals will be incorporated in the general contractor's management plans which will be provided at least 60 days prior to the start of work.	
CIRNAC	2026-02-06-IR#21	Hazardous Waste Disposal	In the 2024 Annual Report, it was noted that two 20-foot dangerous goods containers equipped with integrated secondary containment systems were scheduled to arrive at the West 40 Landfill during the 2025 seallift season to enhance the safe storage of household hazardous waste (HHW) and reduce the risk of environmental contamination. The City was also set to receive containment pallets, which will be used to store smaller volumes of hazardous materials and prevent potential spills during interim handling. This information indicates possible additional waste disposal facilities/areas for hazardous waste which were not included in the Application. Sections 7-38 and 7-39 of the SIG require the Application to provide a description of the type and quantities of hazardous materials to be disposed of and details on the handling and storage of hazardous or potentially hazardous materials.	CIRNAC recommends that the City provide the following information in accordance with sections 7-38 and 7-39 of the SIG: IR-21a) Present the locations of these hazardous waste disposal facilities/areas on a site plan and indicate whether they are temporary in nature. IR-21b) An updated version of the City of Iqaluit Solid Waste Management Plan to include such management activities for hazardous wastes. IR-21c) Update the response to sections 7-38 and 7-39 of the SIG.	<b>IR-21a:</b> The locations of hazardous waste disposal facilities/areas are presented on Figure 4.2 of the Application. <b>IR-21b:</b> An updated (2024) version of the West 40 Landfill O&M Manual includes a description of hazardous waste management activities as well as procedures covering the handling and disposal of various hazardous wastes (i.e., batteries, end-of-life vehicle decontamination, etc.). <b>IR-21c:</b> Sections 7-38 and 7-39 of the SIG have been updated.	Attachment 47 - West 40 Landfill O&M Manual
CIRNAC	2026-02-06-IR#22	Studies	Section 7-43 of the SIG requires the Applicant to provide a list of studies, reports, and plans relevant to the application that have been undertaken to date or are being planned, including design and management decisions. Section 7-43 (a through i) of the SIG list types of reports and plans that may be included.  The City's response to section 7-43 of the SIG states "There are no changes proposed to the existing approved facilities covered under Water Licence No. 3AM-IQA-1626." As mentioned in previous comments, Guide 7 – Licensee Requirements following the Issuance of a Water Licence, Part 2, Section 3 states "Even if information in respect of an SIG(s) was provided upon application for the original licence, the Board requires the licensee to submit updated information addressing the SIG." The City provided the following plans or reports in response to section 7-43 (j, l, m, and q) of the SIG: <ul style="list-style-type: none"> <li>• For j - Preliminary Geotechnical Investigation Report (Arcadis, Aug 2025) (251223-3AM-IQA---- Attach-27-Geotech-Report-Reservoir&amp;Pipeline-Crossing-IMLE)</li> <li>• For l - City of Iqaluit Operations and Maintenance Manuals (via link to NWB Public Registry) <ul style="list-style-type: none"> <li>o City of Iqaluit Landfill Operations and Maintenance Manual, dated December 2018</li> <li>o City of Iqaluit Landfill Operations and Maintenance Manual, dated December 18, 2018</li> <li>o City of Iqaluit Sewage Lagoon Operation and Maintenance Manual, dated March 31, 2020</li> <li>o Process – Mechanical Operation &amp; Maintenance Manual for the Iqaluit Wastewater Treatment Plant, Iqaluit, Nunavut, dated April 24, 2020</li> <li>o Architectural and Structural Operation &amp; Maintenance Manual for the Iqaluit Wastewater Treatment Plant, Iqaluit, Nunavut, dated April 24, 2020</li> <li>o Building Mechanical Operation &amp; Maintenance Manual for the Iqaluit Wastewater Treatment Plant, Iqaluit, Nunavut, dated April 24, 2020</li> <li>o City of Iqaluit Operations and Maintenance Manual (Revised – Version 4.0), Landfill and Waste Transfer Station, dated October 2020</li> <li>o City of Iqaluit Operations and Maintenance Manual, Landfill and Waste Transfer Station, dated August 2022</li> <li>o City of Iqaluit Environmental Management Plan, Landfill and Waste Transfer Station, dated August 2022</li> <li>o City of Iqaluit Erosion and Sediment Control Plan, Landfill and Waste Transfer Station, dated August 2022</li> </ul> </li> <li>• For m - Emergency Response Plan (Arcadis, Sep 2024) (251223-3AM-IQA---- Attach-24-LTWP-Prelim-Design-Rpt-Append-M-ERP-IML)</li> <li>• For q - Closure and Decommissioning Plan Landfill and Waste Transfer Station. (Dillon, Aug 2022) (251223-3AM-IQA---- Attach-38-North40-Landfill-Closure-Plan-IMLE)</li> </ul> <p>The City's response to section 7-43(r) of the SIG states "Final closure plan will be filed 1 year prior to closure of the landfill." From Guide 7 – Licensee Requirements following the Issuance of a Water Licence, Part 2, Section 9, "the licensee must also submit updated plans including designs and reports if plans on the public registry are over three (3) years old or outdated." During review of the City's 2024 Annual Report for Water Licence No: 3AM-IQA1626, the NWB stated that the renewal application must include the most recent and updated versions of management plans and O&amp;M Manuals. All of the reports and plans referenced by the City in response to section 7-43(l) of the SIG are more than five years out of date and should be updated to reflect current conditions, legislation, policies, and best management practices. The reference document provided by the City in response to section 7-43(j) of the SIG is missing the appendices, including the Appendix F which is relevant to the acid rock drainage assessment. The reference document provided by the City in response to section 7-43(m) of the SIG is the Emergency Response Plan for the LTWP and does not address spill contingency and emergency response plans for the waste disposal facilities.</p>	CIRNAC recommends that the City provide the following information in accordance with section 7-43 of the SIG: IR-22a) Updated operation and maintenance plans for all waste disposal facilities included in this Application, including existing facilities. IR-22b) Spill contingency and emergency response plans—updated to reflect current conditions, legislation, policies, and best management practices—for the waste disposal facilities. IR-22c) Update the response to section 7-43 of the SIG.	A large number of reports and plans have been appended to the revised Application. The following is an overview of future work for each major water and waste management infrastructure: 1. Water Treatment Plant: the intake will be replaced in 2026. A conceptual design report is presented as Attachment 10. An updated O&M Manual is presented as Attachment 11. 2. Long Term Water Project: The project is currently at 50% detailed design, and the design report and appendices are included as Attachments 15 through 32. Key will be to permit the replacement of the bridge on the Road to Nowhere in 2026 (with DFO and the NWB) so that construction of the LTWP Raw Water Supply and Storage Reservoir can begin in May 2027. 3. WWTP and Sewage Lagoon: The WWTP has experienced a number of operational issues that the City has been addressing, as described in Section 4.1.1 of the Application. The O&M Manual is provided as Attachments 43 and 45. 4. West 40 Landfill: The latest O&M Manual is provided as Attachment 47, and a previously submitted closure technical memorandum (2014) is presented as Attachment 48. As acknowledged by CIRNAC, a final closure plan will be presented in the next couple of years at least one year prior to closure. An emergency response plans specific to the West 40 Landfill is presented in Appendix G. 5. North 40 Landfill and Waste Transfer Station: These facilities have been constructed, and the CSRs are provided as Attachments 49 and 50. The facilities have not yet been placed in operation. Attachments 51 to 55 are various plans an manuals related to these facilities. 6. An updated Spill Contingency Plan is presented as Attachment 56.  The SIG has been updated accordingly.	Attachment 11 - Water Treatment Plant O&M Manual Attachment 10 - Lake Geraldine Intake Replacement Conceptual Design Attachments 15 to 32 - LTWP Detailed Design Report Attachment 43 - WWTP O&M Manual Attachment 44 - WWTP Draft Control Narrative Attachment 45 - Sewage Lagoon O&M Manual Attachment 46 - Solid Waste Management Plan Attachment 47 - West 40 Landfill O&M Manual Attachment 48 - West 40 Decommissioning Technical Memorandum Attachment 49 - North 40 Landfill Construction Summary Report Attachment 50 - Waste Transfer Station Construction Summary Report Attachment 51 - North 40 Landfill and Waste Transfer Station O&M Manual Attachment 52 - North 40 Landfill Leachate Collection and Characterization Plan
CIRNAC	2026-02-06-IR#23	Monitoring Plan and Quality Assurance/Quality Control Plan	Section 8-1 of the SIG requires that the Applicant provide a Monitoring Plan including a description of the methods, procedures, standards, and schedules proposed and section 8-5 of the SIG requires a Quality Assurance/Quality Control (QA/QC) Plan addressing both field sampling and laboratory analyses.  A summary table that details the updated monitoring plan was included in the Application. The updated Monitoring Plan does not meet the requirements of the Application (i.e., methods, procedures, standards, etc.). Figure 6.1 in the Application presents the location of monitoring sites but does not differentiate between surface water and groundwater locations at the New North 40 Landfill and the Waste Transfer Station. In the table 6.2 of the document "251231 3AM-IQA1626 251223-3AM-IQA---- Applic-Main-Doc-IMLE ", 19MW-05 is presented as an active site. Contrastingly, figure WTS-C02 in the document "251231 3AM-IQA1626 251223-3AM-IQA---- Attach-37-Waste-Transfer-Station-CSR-IMLE" presents 19MW-05 as a monitoring site set to be decommissioned.	CIRNAC recommends that the City provide the following information in accordance with sections 8-1 and 8-5 of the SIG: IR-23a) Updated Monitoring Plan and QA/QC Plan accompanied by a letter from an Analyst of an accredited laboratory confirming acceptability of the Plan. IR-23b) Differentiation between surface water and groundwater locations on the site plan showing the monitoring sites. IR-23c) Confirmation whether 19MW-05 is to remain active. IR-23d) Update the response to sections 8-1 and 8-5 of the SIG.	<b>IR-23a:</b> The Environmental Monitoring and QA/QC Plan has been updated for the revised Application (Attachment 58). Updated credentials from the accredited laboratory used by the City has also been included. <b>IR-23b:</b> While Figure 6.1 does not distinguish between surface water, groundwater, and effluent samples, maps showing this detail is provided in Appendix A of the Environmental Monitoring and QA/QC Plan. <b>IR-23c:</b> Sections 8-1 and 8-5 of the SIG have been updated.	Attachment 58 - Environmental Monitoring and Quality Assurance / Quality Control Plan

**Table 1**  
**City of Iqaluit Water Licence Renewal/Amendment Application**  
**Response to Initial Information Requests**

Agency	Comment ID	Subject	Comment	Recommendation	Response	Reference/Attachment
CIRNAC	2026-02-06-IR#24	Monitoring	Section 8-2 of the SIG requires that the Applicant provide details on the person responsible for sampling including that person's position, contact information and level of training. Section 8-3 of the SIG requires the name and contact information of the certified laboratory performing the analysis of the samples. The section of the reference document does not include the name/position of the person responsible for sampling and does not include the laboratory performing the analysis of the samples.	CIRNAC recommends that the City provide the required information regarding the laboratory and person responsible for sampling, in accordance with sections 8-2 and 8-3 of the SIG, and update the response to sections 8-2 and 8-3 of the SIG.	The Environmental Monitoring and QA/QC Plan (Attachment 58) presents this information. The position and training of environmental samplers is provided in Section 4.10, and details on the laboratory conducting the analyses is provided in Section 5.	Attachment 58 - Environmental Monitoring and Quality Assurance / Quality Control Plan
CIRNAC	2026-02-06-IR#25	Inspection Plan	Section 8-4 of the SIG requires that the Applicant provide an Inspection Plan for engineered facilities related to the management of water and waste as well as spills. Inspection Plans must include a description of the methods, procedures, standards, and schedules proposed. The City's response to section 8-4 of the SIG states "To be developed during the detailed design phase."	CIRNAC recommends that the City provide an Inspection Plan as part of this application and update the response to section 8-4 of the SIG.	The requirements for inspections are incorporated into the O&M manuals and that are appended to the Application.	Attachment 11 - Water Treatment Plant O&M Manual Attachment 43 - WWTP O&M Manual Attachment 45 - Sewage Lagoon O&M Manual Attachment 47 - West 40 Landfill O&M Manual Attachment 51 - North 40 Landfill and WTS O&M Manual Attachment 58 - Environmental Monitoring and QA/QC Plan
CIRNAC	2026-02-06-IR#26	LTWP Surveillance Network Program	Section 8-6 of the SIG requires that the Applicant provide a map detailing the location of monitoring sites. It is noted that the City will identify new surveillance network program (SNP) stations for the LTWP prior to the start of construction. Twelve monitoring wells were installed between February and March 2024 to assess baseline groundwater conditions at the LTWP, as noted in the Physical, Biological and Socioeconomic Screening Report (251231 3AM-IQA1626 251223-3AM-IQA---- Attach-29-Env-Screening-Rpt-IMLE). These monitoring wells are potential sites for continued monitoring as part of the monitoring program; however, their location is unknown, and limited baseline data was provided (i.e. only for MW2023-4 and MW2023 for general chemistry).	CIRNAC recommends that the City provide the following information in accordance with section 8-6 of the SIG: IR-26a) Present the locations of these twelve monitoring wells on a site plan in accordance with section 8-6 of the SIG and indicate whether they have been decommissioned or are scheduled to be decommissioned. IR-26b) Provide the general chemistry results for the other ten monitoring wells in accordance with section 6-5 of the SIG or provide a rationale if they were not sampled. IR-26c) Update the response to section 8-6 of the SIG.	<b>IR-26a:</b> Existing monitoring sites are shown on Figure 6.1 of the Application. More detailed maps showing the monitoring stations at each facility are presented in Appendix A of the Environmental Monitoring and QA/QC Plan (Attachment 58). The City is open to discussing new SNP stations for the LTWP. The stations (and media that is monitored) should be based on the potential for effects. During construction, SNP stations should be strategically located to monitor the runoff from construction areas and quarries. During operations, SNP stations will be required to measure flow and water volumes extracted from local waterbodies. A Water Management Plan is envisaged to monitor and adapt extraction to water levels in the extraction water bodies. The City does not believe groundwater monitoring will be necessary to monitor effects, and many of the current wells will be displaced by the reservoir. <b>IR-26b:</b> The 10 other monitoring wells were installed to measure water levels. It wasn't judged necessary to have groundwater quality data for each monitoring well location. <b>IR-26c:</b> Section 8-6 of the SIG has been updated.	Attachment 58 - Environmental Monitoring and QA/QC Plan
CIRNAC	2026-02-06-IR#27	Explosives Management Plan and a Refueling Plan	The Emergency Response Plan (251231 3AM-IQA1626 251223-3AM-IQA---- Attach-24-LTWP-Prelim-Design-Rpt-Append-M-ERP-IMLEArcadis, 2024) references an Explosives Management Plan and a Refueling Plan. These plans were not included in the submission of the Application. Without these plans it would not be possible to comment on the completeness of the Application.	CIRNAC recommends that the City provide the Explosives Management Plan and a Refueling Plan for review.	These plans require the Project to be advanced in design, and ideally these are developed by the contractor responsible for building the facilities. The City suggests that these plans could be filed with the Board prior to construction.	
CIRNAC	2026-02-06-IR#28	Safety Data Sheets (SDS)	In the Emergency Response Plan - Long Term Water Program - Supply and Storage (251231 3AM-IQA1626 251223-3AM-IQA---- Attach-24-LTWP-Prelim-Design-Rpt-Append-M-ERP-IMLE), emergency steps taken for a chemical spill include consulting the SDS. SDSs for chemicals expected as part of the LTWP have not been included in the Plan to assess whether emergency actions outlined in the Plan are appropriate.	CIRNAC recommends that the City submit an updated Emergency Response Plan that appends SDSs for chemicals expected as part of the LTWP. Note that these SDSs must also be included in the next iteration of the Spill Contingency Plan.	Acknowledged. As noted above, this plan requires the Project to be advanced in design, and ideally these are developed by the contractor responsible for building the facilities. The City suggests that a site-specific Spill Contingency Plan for construction, complete with the SDSs the contractor will use, be filed with the Board prior to construction.	
CIRNAC	2026-02-06-IR#29	Verify Supplemental Information Guideline (SIG) Table	Within the document "251231 3AM-IQA1626 251223-3AM-IQA---- Attach-04-SIG-Concordance-IMLE", column H of tables 2.0 through 8.0 was in many cases either empty or did not provide the correct information. Providing accurate and complete information within the SIG table is essential for ensuring timely and thorough reviews of each of the Water License application requirement.	CIRNAC recommends that the City verify the accuracy of the information provided after updating all of the previously mentioned sections of the SIG.	This has been reviewed and updated. The SIG concordance table is Attachment 5 in the revised Application.	Attachment 5 - SIG Concordance Table
CIRNAC	2026-02-06-IR#30	Ongoing Unaddressed Recommendations	Through review of the City's annual reporting on Water Licence 3AM-IQA1626, CIRNAC has raised multiple concerns and compliance issues. In the November 20, 2025, NWB Technical Review of 2024 Annual Report for the City of Iqaluit; Water Licence No: 3AM-IQA1626 there were 33 recommendations/concerns raised by CIRNAC, 32 of which remain unresolved. The following recommendations/concerns have been resolved: 2024 R-11 recommends the applicant provide an update on when the Closure and Reclamation Plan for the for the West 40 Landfill will be submitted to the NWB. The City has stated that the plan will be submitted one (1) year prior to commencing the decommissioning of the West 40 Landfill. There were three unresolved recommendations that were expected to be addressed in this Application: <ul style="list-style-type: none"> <li>CIRNAC recommended that the O&amp;M Manuals for the Landfill and Waste Transfer Station, Wastewater Treatment Plant and Water Treatment Plant be submitted with the renewal application or 2025 Annual Report, whichever is first.</li> <li>CIRNAC recommended clarification on whether [a spill] was considered a small, medium, or large spill based on spill types in the General Spill Response Plan and recommended adding this information to NWT/NU Spill Report Form to aid personnel to quantify spill when completing a spill report by estimating the size of the spill. CIRNAC recommended that a copy of this spill report be provided and included in the Spill Contingency Plan to be submitted with the renewal application or 2025 Annual Report, whichever is first.</li> <li>CIRNAC recommended that the City submit an updated and recalibrated Lake Geraldine Water Balance Model to address the new bathymetric survey data collected in 2024 and the updated metrological information to be submitted with the renewal application or 2025 Annual Report, whichever is first.</li> </ul>	CIRNAC recommends that the City provide the following to resolve previous recommendations that were expected to be addressed in this Application: IR-30a) Updated O&M Manuals for the Landfill and Waste Transfer Station, Wastewater Treatment Plant and Water Treatment Plant. IR-30b) Updated Spill Contingency Plan. IR-30c) Updated and recalibrated Lake Geraldine Water Balance Model.	<b>IR-30a:</b> The O&M manual for the North 40 Landfill and Waste Transfer Station is presented as Attachment 51 of the revised Application. The manuals will be updated once operating experience has been gained to warrant updating. At present, there is no new information that warrants updating the plans. <b>IR-30b:</b> The updated Spill Contingency Plan is presented as Attachment 55 of the revised Application. <b>IR-30c:</b> The original (2013) water balance model is presented as Attachment 12, and the updated and recalibrated water balance model is presented as Attachment 13.	Attachment 51 - North 40 Landfill and Waste Transfer Station O&M Manual Attachment 55 - Spill Contingency Plan Attachment 12 - Lake Geraldine Water Balance Model Attachment 13 - Lake Geraldine Water Balance Model Update
DFO	NWB-DFO-01	Request for Review	The City of Iqaluit proposal has the potential to impact fish and fish habitat through the use of explosives, water withdrawal, the installation or replacement of culverts and pipes, and the dewatering of ponds. A Request for Review has been submitted to DFO and is actively being assessed.		Acknowledged.	
DFO	NWB-DFO-02	Use of explosives	Blasting operations may be conducted during the construction phase of the proposal. The use of explosives in or near aquatic environments can cause harm to fish by rupturing the swim bladder and/or damaging other internal organs, and damaging incubating eggs. It could also result in physical and/or chemical alterations to fish habitat. In Attachment 19 (LTWP Preliminary Design Report – Appendix J: Preliminary Blast Assessment), the City of Iqaluit commits to limiting water overpressures to 100 kPa at the location of a live fish.	DFO recommends that if explosives are used in or near water, an instantaneous pressure change threshold of 50 kPa be applied to appropriately mitigate effects of blasting on fish, as recommended in Cott and Hanna (2005). In addition, the Guidelines for the Use of Explosives In or Near Canadian Fisheries Waters (Wright and Hopky, 1998) specify that peak particle velocities must not exceed 13 mm/s at spawning beds during egg incubation periods.	The City of Iqaluit agrees to apply the 50 kPa threshold.	
DFO	NWB-DFO-03	Culvert replacements	The project description indicates that road upgrades between Geraldine Lake and the Road to Nowhere may require the replacement of several culverts. However, no details have been provided. DFO recommends that the proponent provide the following information on all culverts included with the road upgrade works: location; potential for fish presence; current condition; type/size (existing and proposed culverts); channel bankfull width; gradient; photos; connecting waterbodies; stream type; description of the proposed upgrade or replacement methods, timing, and potential in-water work requirements.		This information (90% designs) for these culverts were recently provided to DFO separately. DFO recently agreed to review a technical memorandum that Arcadis will be providing the City in the near term. Final designs will be submitted to the NWB prior to construction.	
DFO	NWB-DFO-04	Water withdrawal	Section 3.1 of the City of Iqaluit Type A Water Licence Amendment and Renewal Application states that the City of Iqaluit will monitor the Apex River discharge using WSC stations 10UH015 and 10UH002 to ensure water is not withdrawn when flow is below 30% of Mean Average Discharge (MAD). The Application further states that water withdrawal from the Apex River will be limited to 10% instantaneous discharge when flow is between 0.143 m <sup>3</sup> /s and 0.156 m <sup>3</sup> /s (between 30% and 33% MAD), or up to 20% instantaneous discharge when flow exceeds 0.156 m <sup>3</sup> /s (>33% MAD). DFO would like to inquire whether discharge logs and water withdrawal rates (including instantaneous withdrawal rates, associated percentages, and comparisons to MAD) will be reported in the annual report to confirm the withdrawal conditions have been met and to ensure protection of fish and fish habitat.		The Apex River pump station will have flow metering capability which will allow reporting of water taking through the SCADA systems. This data can be summarized in the City's annual report. WSC monitoring data will be used to determine the water withdrawal rates and can also be reported to confirm compliance.  A report describing the Apex River Supplemental Pumping Program will continue to be provided demonstrating withdrawal rates, associated percentages, and comparisons to Mean Annual Discharges (MAD) will be provide in the City's Annual Report as required under the Water Licence.	

**Table 1**  
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**Response to Initial Information Requests**

Agency	Comment ID	Subject	Comment	Recommendation	Response	Reference/Attachment
DFO	NWB-DFO-05	Monitoring of Fish Habitat During Water Withdrawal	<p>The Application proposes that withdrawal from the Apex River will be limited to 10% instantaneous discharge when flow is between 0.143 m<sup>3</sup>/s and 0.156 m<sup>3</sup>/s (between 30% and 33% MAD), or up to 20% instantaneous discharge when flow exceeds 0.156 m<sup>3</sup>/s (&gt;33% MAD). Although DFO recommends the proponent follow the Framework for Assessing the Ecological Flow Requirements to Support Fisheries in Canada when withdrawing from watercourses (i.e., cumulative flow alterations &lt;10% in amplitude of the instantaneous flow in the river relative to a natural flow regime), it is acknowledged that Stantec's 2023 study Analysis of Fisheries and Hydrologic Information of Apex River (referenced in Attachment 33), indicated that it is unlikely that the proposed pumping protocol would result in negative impacts to fish and fish habitat in the Apex River. DFO, however, will further review the supporting evidence during our review process to assess the potential impacts from water withdrawal on channel hydraulics.</p> <p>DFO notes that the proposed withdrawal protocol is based on hydraulic and habitat modelling supported by baseline field surveys, but no in-situ monitoring was conducted during pumping events (above 20% instantaneous flow) to validate model predictions.</p> <p>DFO recommends that the proponent implement field monitoring during future withdrawal periods to confirm that modelled changes in depth, velocity, and wetted area accurately reflect real conditions in the Apex River. This information is necessary to validate the modelling approach, confirm that withdrawal thresholds are protective of resident Arctic char, and ensure that increased withdrawal rates do not result in impacts to fish and fish habitat.</p> <p>DFO further recommends that contingency measures be established in advance (e.g., reducing withdrawal rates) if monitoring indicates that non-predicted adverse effects to fish or fish habitat are occurring when pumping above 10% instantaneous flow.</p>		<p>The City's design consultant for the LTWP is currently assessing feasibility of instrumentation installation in the Apex River, which is challenging due to the need to remove and install annually based on expected damage from ice.</p> <p>The intent is to use existing WSC monitoring stations in place and incorporate their data through API (live data transfer) to determine permitted withdrawal rates. This will provide level and velocity data. The potential for calculating volumes based on wetted area will be explored during detailed design completion.</p> <p>As recommended by the DFO, the proponent will implement field monitoring during future withdrawal periods to confirm that modelled changes in depth, velocity, and wetted area accurately reflect real conditions in the Apex River.</p> <p>As recommended by the DFO, contingency measures be established in advance (e.g., reducing withdrawal rates) if monitoring indicates that non-predicted adverse effects to fish or fish habitat are occurring when pumping above 10% instantaneous flow. These will be included in the Environmental Protection Plan and Environmental Management Plan for the LTWP.</p>	
DFO	NWB-DFO-06	Existing Structures	<p>DFO requests clarification on whether the existing Apex River temporary pump station and associated piping will be fully removed once the new water-withdrawal infrastructure is constructed. Information on the timing, methods, and extent of decommissioning is required to assess potential impacts to fish and fish habitat and to determine whether any additional mitigation measures may be necessary.</p>		<p>The temporary pumping equipment currently used at the Apex River is removed from the Apex River prior to each winter and is deployed prior to the river melt in the late spring. The current planning has the temporary pumping equipment remaining in use during the LTWP construction so that water can be pumped into Lake Geraldine if needed. Once the LTWP is commissioned, the temporary Apex River pumping equipment and pipeline will be decommissioned.</p> <p>The existing Apex River pumping consists of submersible pumps in cages with flexible discharge hoses that are installed seasonally during the June freshet. This infrastructure is removed every Fall prior to river freeze up.</p>	
DFO	NWB-DFO-07	Pond 5 Fish Absence	<p>In Section 3.2.3.3 of the Fish &amp; Fish Habitat Report (Attachment 30), Pond 5 is described as an isolated waterbody likely formed through snowmelt and rainwater accumulation in permafrost depressions. The Report states that Pond 5 is not connected to any known fish-bearing waterbodies, such as the Apex River or Lake Qikiqtaaluk, and that no hydrologic connections exist that would permit fish passage.</p> <p>However, Figure 2-01 of the LTWP Preliminary Design Report – Appendix B – Topographic Survey (Attachment 11) illustrates a surface connection between Pond 5 and Lake Geraldine. As Lake Geraldine has the potential to support fish species such as Arctic char and Ninespine stickleback, DFO recommends that the City of Iqaluit provide rationale explaining why fish, particularly Ninespine stickleback, are not expected to migrate to Pond 5 despite the indicated connection.</p>		<p>Pond 5 is shown on Figure 2-01 as having a surface drainage feature toward Lake Geraldine; however, field observations confirm this feature functions as a one-way, down-gradient discharge channel from Pond 5 to Lake Geraldine, not a bidirectional connection capable of supporting upstream fish passage. Pond 5 is located higher than Lake Geraldine (approximately ≥6 m elevation drop over ~57 m horizontal distance, equating to ≥10% gradient). The channel is short, shallow, and rock-dominated with no defined pools, continuous depth, or low-velocity resting areas necessary for fish movement. Under these physical conditions, upstream migration from Lake Geraldine to Pond 5—particularly for small-bodied species such as Ninespine stickleback—is not considered feasible. In addition, no fish were detected in Lake Geraldine during two independent surveys (Nunami Stantec, 2017; Arcadis, 2024), and no fish have been observed in Pond 5. Accordingly, Pond 5 is considered functionally inaccessible to fish despite the mapped surface drainage feature.</p>	
DFO	NWB-DFO-08	General	<p>In order to comply with the Fisheries Act, it is recommended that the proponent follow DFO's protective measures for fish and fish habitat and standard codes of practice which can be found on DFO's website (<a href="https://www.dfo-mpo.gc.ca/pnw-ppe/measures-mesures-eng.html">https://www.dfo-mpo.gc.ca/pnw-ppe/measures-mesures-eng.html</a> and <a href="https://www.dfo-mpo.gc.ca/pnw-ppe/practice-practique-eng.html">https://www.dfo-mpo.gc.ca/pnw-ppe/practice-practique-eng.html</a>). By doing so, you ensure that any works, undertaking or activities where impacts to fish and fish habitat can be avoided.</p> <p>It is also the proponent's Duty to Notify DFO if they have caused, or are about to cause, the death of fish by means other than fishing and/or the harmful alteration, disruption, or the destruction of fish habitat. Such notification should be directed to DFO.ARCEMTriage-TriageGEARC.MPO@dfo-mpo.gc.ca.</p>		<p>Noted.</p>	