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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

August 26, 2026

File No: 3AM-IQA1626 Renewal/Amendment

By Email

Jody Small
Regional Director
Prairie & Northern Region, ECCC
9250 – 49 Street NW
Edmonton, Alberta T6B 1K5

Email: jody.small@ec.gc.ca

Re: Invitation from the Nunavut Water Board to Environment and Climate Change Canada to participate in the upcoming Public Hearing in relation to the Application of the City of Iqaluit to renew/amend Water Licence No. 3AM-IQA1626

Dear Jody Small:

At the Nunavut Water Board's (NWB or Board) Pre-Hearing Conference, recently held on August 12, 2026, in Iqaluit, regarding the City of Iqaluit's (City or Applicant) application to renew and amend Water Licence No. 3AM-IQA1626 (the Application), the Government of Nunavut (GN) identified that Environment and Climate Change Canada (ECCC) should be invited to participate in the upcoming Public Hearing for the file. The Application seeks authorization for the City to continue operating its municipal water supply, wastewater treatment, and solid waste systems and seeks various amendments to monitoring and reporting obligations under the Licence, extending the term of the Licence for 20 years, and adding additional water sources, increasing water use and adding additional water supply and solid waste management infrastructure.

Subsequently, on August 24, the NWB's City of Iqaluit decision-making panel for the Application met to decide whether the Application could proceed to a Public Hearing. After due consideration of the matter, including GN's request to invite ECCC to participate, the City of Iqaluit Panel decided[1]:

- that the file can proceed to a two-day Public Hearing to be held in Iqaluit (with provision for remote access and participation) sometime **during the week of November 2-6, 2026**; and

[1] For convenience, the NWB has attached the NWB's Pre-Hearing Conference Decision Report regarding an Application to renew and amend Type A Water Licence No: 3AM-IQA1626, August 24, 2026, as it provides more detail on the scope of the Application, the comment submissions of parties to date and the procedural history of the Application.

- that a specific invitation should be extended to ECCC to participate in the Public Hearing, recognizing ECCC's history of extensive and on-going involvement with the City's municipal operations and significant contributions to the NWB's prior consideration of the existing water licence in 2016.

In particular, the Board emphasized the important contributions of ECCC during the NWB's 2016 water licensing process. ECCC provided essential information considered by the Board during decision-making for the 2016 water licensing process, summarized as follows in the Board's 2016 Reasons for Decision[2] associated with the issuance of the Licence 3AM-IQA1626 (attached for your reference):

1. Implementation of secondary treatment;
2. Effluent quality criteria for municipal wastewater;
3. Management of contaminated sediments from various landfill water management ponds; and
4. Terms and conditions for a Licence (including amendments to the Expired Licence).

With respect to implementation of secondary treatment of sewage effluent, ECCC further recommended that the upgraded wastewater treatment system, which was proposed, but not yet implemented at the time of the 2016 Public Hearing should ensure that the upgraded design specifications be such that the discharge from the wastewater treatment system should be compliant with the *Fisheries Act*.

As noted in the NWB's 2016 Reasons for Decision, as the NWB does not have jurisdiction over discharges from the City's Sewage Lagoon Facility and the Wastewater Treatment Plant (WWTP) into the marine environment, consequently, discharge criteria for these facilities were not included in the current Licence. However, based on discussions during the NWB's water licensing process, the NWB made recommendations to the Federal parties with jurisdiction over discharges into the marine environment as follows:

> *…recognizing that the jurisdiction of the NWB is limited to "waters" as defined under s. 4 of the NWNSRTA to mean inland waters, the Board also agrees that a water licence is not the appropriate instrument for the establishment of effluent quality criteria for discharges into the marine environment. Consequently, the Board has removed from the Licence those terms and conditions (Part E, Items 3 (a) and (b) in the Expired Licence that purported to regulate effluent quality at the point of discharge into the marine environment.*
>
> [However]*…Reflecting the NWB's advisory role, the Board recommends that when considering the City's application for the required authorizations under the Arctic Waters Pollution Prevention Act, R.S.C. 1985, c. A-12, Indigenous and Northern Affairs Canada (INAC), and the Government of Nunavut (GN) authority responsible for issuing the required authorization under the Territorial Lands Act, consider including similar effluent quality criteria as the criteria formerly*

[2] See the full summary of ECCC's comment submissions in NWB, Type A Water Licence No. 3AM-IQA1626 Reasons for Decision, Including Record of Proceedings, June 17, 2016 at pp. 23-24.

> *developed by the Board and included in the Expired Licence. The NWB, in selecting the criteria in the Expired Licence had determined that these criteria were sufficiently protective of water quality in the area and therefore it is the Board's position that these criteria could provide a useful basis for the regulatory authorizations ultimately developed by INAC and GN to authorize the discharges from the SWWTP.*[3]

ECCC also provided information to the NWB in their compliance and enforcement capacity under the Federal *Fisheries Act*, which was considered by the Board to assess the City's capacity to carry out the municipal undertaking in accordance with the terms and conditions of their Water Licence. ECCC's extensive involvement with the City of Iqaluit as an inspection and enforcement authority was extensively referenced in the NWB's 2016 Reasons for Decision,[4] culminating in the following summary and request by the NWB:

> *Based on the evidence provided by the Inspectors for both INAC and ECCC, the Board is, for the first time in more than 20 years, cautiously optimistic that great strides are being made to improve environmental performance and bring the City into full compliance. To this end, the Board would appreciate being kept informed by all the parties as the City's plans for compliance continue to progress over the course of the current Licence.*[5]

Recognizing the importance of ECCC's previous contribution to the NWB's licensing of the City's municipal undertaking and in support of the request of the Government of Nunavut, the NWB respectfully requests ECCC participate in the next steps in the NWB's processing of the City of Iqaluit's Application which, as set out in the NWB's Pre-Hearing Conference Decision (attached) are as follows:

- **On or before Monday, October 5, 2026** the Interveners, members of the public or other interested parties must file any further and final written submissions in respect of the Amendment Application with the Board;
- **On or before Monday, October 19, 2026** the Applicant must file any further responses to the information filed in advance of the Public Hearing and must file their final written submissions with the Board;
- **On or before Thursday, October 28, 2026** all parties intending to present to the Board during the Public Hearing must file any presentation materials (e.g., PowerPoint Presentations, etc.) upon which they intend to rely at the Public Hearing;
- **Week of November 2-6, 2026** two-day Public Hearing for the Amendment/Renewal Application hosted in-person in Iqaluit with remote access options (tentative dates for the Public Hearing are November 05-06, 2026).

NOTE: Parties filing additional written submissions, final statements and/or presentation materials

[3] NWB, Type A Water Licence No. 3AM-IQA1626 Reasons for Decision, Including Record of Proceedings, June 17, 2016 at p. 30.
[4] NWB, Type A Water Licence No. 3AM-IQA1626 Reasons for Decision, Including Record of Proceedings, June 17, 2016 at pp. 30-35.
[5] NWB, Type A Water Licence No. 3AM-IQA1626 Reasons for Decision, Including Record of Proceedings, June 17, 2016 at pp. 34-35.

as outlined above, are also required to provide **an Executive Summary of their written submissions in English, French and Inuktitut and fully translated copies of their presentation materials or final summaries in English, French and Inuktitut at the same time** as they file the full submission.

If you have any questions or require further follow up in relation to this invitation or the Application, please contact the technical lead for the file, Nidhi Singh, NWB, Technical Advisor by email to nidhi.singh@nwb-oen.ca or by phone at (867) 360-6338.

Regards,



Karén Kharatyan
Director of Technical Services
Nunavut Water Board

Attachments: NWB, Type A Water Licence No. 3AM-IQA1626 Reasons for Decision, Including Record of Proceedings, June 17, 2016.
Pre-Hearing Conference Decision Report regarding an Application to renew and amend Type A Water Licence No: 3AM-IQA1626, August 24, 2026.

cc. Eva Walker, Head, Environmental Assessment North and Expert Support to Environmental Assessment, ECCC
NWB Public Registry City of Iqaluit Distribution List