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

Water Licence Renewal and Amendment Application for Type “A” Water Licence 3AM-IQA1626

Nunavut Water Board Public Hearing
November 5-6, 2026



Presentation Outline

- Role and Responsibilities
- Contributions to the Water Licence Application Review
- Status of Technical Review Comments
- Remaining Recommendations
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Roles and Responsibilities

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

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

Contributions to Water Licence Application Review

CIRNAC made the following submissions to the Nunavut Water Board (NWB) regarding the application

- February 6, 2026 – CIRNAC's completeness assessment of the Licence Application
- May 15, 2026 – CIRNAC's comments on the City's responses to information requests
- June 17, 2026 – CIRNAC met with the City of Iqaluit to discuss outstanding Information Requests
- June 30, 2026 – CIRNAC's submission of technical review comments
- August 11-12, 2026 – CIRNAC participated in Technical Meeting and Pre-hearing Conference
- August 14, 2026 – CIRNAC's response concerning expectations for an Erosion and Sediment Control Plan
- August 21, 2026 – CIRNAC's response concerning future water balance model updates
- October 7, 2026 – CIRNAC's Final Submission to the NWB

CIRNAC's Recommendations Construction Water Management and Surface Water Quality (TR-01 to TR-03, TR-13, and TR-20)

The City submitted a draft Construction Water Management and Monitoring Plan and committed to provide updated construction environmental management plans.

CIRNAC recommends the following:

- The final construction plans establish monitoring requirements, action thresholds, corrective actions, responsibilities, contingencies, and reporting.
- The final plans be submitted at least 60 days before the applicable construction activities.
- The applicable activities not begin until the governing plans have been reviewed by interested parties and approved by the Board.
- Construction contact water meet one clear and enforceable total suspended solids criterion of 30 mg/L before discharge.
- Each plan identify the activities, areas, and project phases to which it applies and which plan governs where requirements overlap.

Partially resolved overall.

TR-03 is resolved subject to commitments.

Follow-up through licence conditions is required for the remaining matters.

CIRNAC's Recommendations Dam Safety, Permafrost, and Infrastructure Design (TR-04 to TR-06, and TR-14)

The City submitted a preliminary Dam Breach and Inundation Analysis and provided additional information concerning design, permafrost, seepage, instrumentation, and operation and maintenance.

CIRNAC recommends the following:

- Final dam and water-retaining structure designs be prepared and stamped by a professional engineer registered to practise in Nunavut and demonstrate compliance with current applicable Canadian Dam Association guidance.
- A final Dam Breach and Inundation Analysis address relevant breach scenarios and cascading effects on the Lake Geraldine Dam.
- Final operation, maintenance, surveillance, and emergency documentation be submitted for Board approval.
- The new reservoir not be filled or placed into service until the Board has approved the final design documentation, final Dam Breach and Inundation Analysis, and applicable operations and maintenance documentation.

Partially resolved. Follow-up through licence conditions is required..

CIRNAC's Recommendations Water Supply, Water Balance, and Climate Change (TR-07 to TR-09)

The City clarified several hydrologic methods, source-water assumptions, and the purposes of its operational and long-term planning tools.

CIRNAC recommends the following:

- The existing calibrated GoldSim model be updated to represent the integrated municipal water-supply system. The City's Excel-based tool and calibrated GoldSim model serve different purposes; CIRNAC recommends retaining and expanding the GoldSim model as a long-term planning and regulatory tool.
- Model results be compared with observed system performance and the model be periodically reviewed and recalibrated.
- Lake Qikiqtalik withdrawals not begin until the Board has approved operating rules addressing seasonal withdrawal limits, water-level or flow thresholds, monitoring, low-water contingencies, and adaptive management.
- Climate risk be periodically reassessed.

Partially resolved. Follow-up through licence conditions is required.

CIRNAC's Recommendations Wastewater, Solid Waste, and Compliance (TR-11, TR-16, TR-18, TR-19, IR-10, and IR-21)

The City clarified the role of the sewage lagoon, the distinction between hydraulic and effective treatment capacity, and several existing compliance matters. The role of the sewage lagoon is resolved subject to appropriate licence wording; remaining matters require follow-up.

CIRNAC recommends the following:

- Annual reports compare wastewater flows and treatment performance with the applicable design basis and include updated population information when available.
- A capacity-management and infrastructure implementation plan be required if effective treatment capacity may be exceeded during the licence term.
- Monitoring criteria and response triggers be established for waste facilities.
- All solid-waste activities remain covered by approved and current plans.
- Annual reports track outstanding compliance actions, responsibilities, target dates, and evidence of completion.
- Reduce the routine full metals-scan frequency from monthly to quarterly, while retaining the ability for the Board or Inspector to require increased monitoring where warranted.

TR-11 is resolved subject to inclusion in the renewed licence.

Remaining matters are partially resolved and require follow-up through licence conditions.

CIRNAC's Recommendations Monitoring, Reporting, and Management Plans (TR-10, TR-12, TR-17, TR-19, TR-20, and IR-23 to IR-24)

The City identified the Environmental Monitoring Program and QA/QC Plan as the primary monitoring document and committed to updated environmental protection and spill contingency plans.

CIRNAC recommends the following:

- The Environmental Monitoring Program and QA/QC Plan be identified as the governing monitoring document and establish consistent methods, data-quality requirements, comparison criteria, reporting, and follow-up procedures.
- Monitoring results be compared with applicable criteria, guidelines, baseline conditions, approved predictions, or other appropriate benchmarks.
- Plans clearly identify where and when they apply and which plan governs where requirements overlap.
- Exceedances and adverse trends trigger investigation and appropriate follow-up.
- Seasonal baseline water-quality information, or a technical rationale demonstrating that existing information adequately characterizes natural variability, be provided before regular withdrawal from Lake Qikiqtalik or operation of other new source-water facilities.

Partially resolved. Seasonal baseline water quality (TR-12) remains unresolved.

Follow-up through licence conditions is required.

Summary of CIRNAC's Position and Recommendations

CIRNAC acknowledges the additional information provided by the City and the progress made during the review.

CIRNAC recommends that the renewed licence require the following:

- Approved construction environmental management plans before applicable activities begin
- Approved construction and operational spill contingency plans
- Final design, dam-safety, and operational documentation before the new reservoir is filled or placed into service
- An updated and periodically verified water balance model
- Approved Lake Qikiqtalik operating rules and source-water monitoring
- Seasonal baseline water-quality information or an adequate technical rationale
- A governing monitoring and QA/QC framework
- Wastewater capacity reporting and a capacity-management trigger
- Annual tracking of dam-safety recommendations, required plans and manuals, Board and Inspector directions, and outstanding compliance actions
- Required plans and technical submissions be provided within specified timeframes and approved before the associated activity proceeds
- A 10-year licence term reflecting the status of design and construction, compliance history, wastewater-capacity planning, and major infrastructure decisions

CIRNAC does not object to the Board advancing the application to a decision, provided that the renewed licence includes clear and enforceable terms and conditions addressing these matters.

Conclusion

CIRNAC acknowledges the additional information provided by the City and the progress made through the review and commitment process.

Some comments have been resolved. Most comments remain dependent on final design, monitoring, or management documentation and can be addressed through clear and enforceable licence conditions.

These conditions should establish required submissions and deadlines, opportunities for review by interested parties where appropriate, Board approval, restrictions on proceeding before approval, measurable criteria, monitoring and reporting, and corrective action and adaptive management.

CIRNAC remains committed to ensuring a robust regulatory regime is in place with continued environmental and freshwater source protections.


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