



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

Your file - Votre référence
3BM-KUG2030
Our file - Notre référence
145676906

April 30, 2026

Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
E-mail: licensing@nwb-oen.ca

Re: Crown-Indigenous Relations and Northern Affairs Canada's Review of the Action Remediation (AR) Plan for the Hamlet of Kugluktuk, Type B Water Licence No. 3BM-KUG2030

Dear Richard,

Thank you for the April 10, 2026 invitation to review the referenced Action Remediation (AR) Plan, submitted by the Hamlet of Kugluktuk, for Type B Water Licence No. 3BM-KUG2030.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the application pursuant to its mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Crown-Indigenous Relations and Northern Affairs Act*. CIRNAC provides the following Technical Review Memorandum for the Board's consideration.

The applicant shall provide confirmation from the Nunavut Water Board that all outstanding water license fees have been paid in full prior to approval of this application.

If there are any questions or concerns, please contact me at (873) 800-5240 or Pauline.Firmin@rcaanc-cirnac.gc.ca or Andrew Keim at (867) 975-4550 or Andrew.Keim@rcaanc-cirnac.gc.ca.

Sincerely,

Pauline Firmin

Pauline Firmin, M. Sc,
Regional Coordinator

Technical Review Memorandum

Date: April 30, 2026

To: Richard Dwyer – Manager of Licensing, Nunavut Water Board

From: Pauline Firmin – Regional Coordinator, CIRNAC

Subject: **Crown-Indigenous Relations and Northern Affairs Canada’s Review of the Action Remediation (AR) Plan for the Hamlet of Kugluktuk, Type B Water Licence No. 3BM-KUG2030**

Region: Kitikmeot Kivalliq Qikiqtani

A. BACKGROUND

The Hamlet of Kugluktuk is located, within the Kitikmeot Region of Nunavut, near the mouth of the Coppermine River on Coronation Gulf at 67° 49’ 32” N Latitude and 115° 05’ 42” W Longitude. The Hamlet is responsible for the municipal water supply, sewage treatment, and solid waste management facilities under Nunavut Water Board Water Licence No. 3BM-KUG2030, issued for a municipal undertaking and valid until December 7, 2030.

The Hamlet of Kugluktuk is responsible for the operation, maintenance, and compliance of municipal infrastructure including the sewage lagoon, solid waste disposal facility, and associated land farm. These facilities support essential community services but have been subject to recurrent operational and environmental compliance issues identified through inspections conducted by Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC).

The Action Remediation (AR) Plan was developed by the Hamlet in response to inspection findings and compliance concerns, and outlines proposed corrective actions across six priority areas: erosion mitigation at the backwash pond, removal of debris from the sewage lagoon, hydrocarbon cleanup, improvement of battery storage, restoration of propane cylinder storage and development of a Land Farm Remedial Action Plan. The AR Plan is intended to guide remediation activities during the 2025–2026 period.

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

Table 1: Summary of Recommendations

Recommendation Number	Subject
R-01	Missing Information On Design Of Rip-Rap
R-02	Clarification On Hazardous Waste Management Practices For Batteries
R-03	Reminder About The Land Farm Remedial Action Plan
R-04	Non-Compliance Issues Not Addressed In The Action Remediation Plan

B. DOCUMENTS REVIEWED AND REFERENCED

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

Table 2: Documents Reviewed and Referenced

Document Title	Author, File No., Rev., Date
Hamlet of Kugluktuk Action Remediation (AR) Plan	Manager of Infrastructure & Projects, March 2026
2024 Water Licence Inspection Report	Isaiah James Bolt, October 10, 2024
2020 Water Licence Inspection Report	Baba Pedersen, August 17 & 18, 2020
Renewal Water Licence 3BM-KUG2030	Nunavut Water Board, December 8, 2020

C. RESULTS OF REVIEW

1. Missing Information On Design Specification for use Of Rip- Rap

Comment:

CIRNAC notes that the proponent proposes erosion mitigation measures at the Backwash Pond consisting of placement of geotechnical filter cloth overlain by riprap along erosion-prone areas (AR Plan, Section 5.1). However, no design drawings or supporting design information have been provided to describe the proposed works in sufficient detail. In the absence of detailed design documentation, CIRNAC is unable to assess whether the proposed measures are appropriate for the site conditions (AR Plan, Section 5.1).

CIRNAC further notes that, under the Water Licence, construction or modification of structures intended to contain, divert, or retain water or waste requires submission of stamped design drawings by a qualified engineer sixty days prior to construction (Water Licence No. 3BM-KUG2030, Part E, Item 1).

Recommendation:

(R-01) CIRNAC recommends that the proponent provide stamped design drawings and additional design information to support review of the proposed erosion mitigation measures at the Backwash Pond, including:

- core design assumptions (e.g., subgrade condition and stability of the berm substrate);
- key design parameters such as slope, riprap size and thickness, material source, hydraulic design basis (e.g., design flows or frequency), and details of anchorage or toe protection; and
- identification of anticipated failure modes (e.g., riprap sliding, toe loss, geotextile damage) and justification of how the design addresses these risks.

This information would assist CIRNAC in understanding the adequacy of the proposed approach and its likelihood of achieving the stated erosion control objectives.

2. Clarification On Hazardous Waste Management Practices For Batteries

Comment:

CIRNAC notes that the Action Remediation (AR) Plan proposes to address improper storage of waste batteries through cleanup actions and “routine” inspections with recording of volumes (AR Plan, Section 5.4). However, the AR Plan does not define the

frequency or scope of these inspections, unlike other compliance measures in the Plan where inspection intervals (e.g., quarterly or seasonal) are clearly specified (AR Plan, Sections 5.5 and 6.1).

CIRNAC further notes that improper storage of used batteries has been a recurring issue at this site. Similar concerns were identified during the 2020 inspection, where used batteries were observed mixed with general waste at the garbage dump and required corrective action at that time (2020 Inspection Report, Section 2, Item 7; Section 3, Item 7). Subsequent inspections indicate that this issue has reoccurred, suggesting that prior corrective measures may not have been sustained over the longer term.

Given that hazardous wastes, including used batteries, are required to be segregated, stored, and managed to prevent the deposit of deleterious substances into water (Water Licence No. 3BM-KUG2030, Part D, Item 11), the lack of specificity regarding inspection frequency and broader management controls limits the ability to assess whether the proposed approach will effectively prevent recurrence.

Recommendation:

(R-02) CIRNAC recommends that the proponent clarify how “routine” inspections and hazardous waste management will be implemented in practice, including consideration of inspection frequency, record-keeping, and handling procedures for used batteries.

CIRNAC further recommends that additional detail be provided on how the plan addresses ongoing hazardous waste management requirements, including storage, segregation, and transportation of hazardous wastes to approved facilities, to support long-term compliance with applicable legislative and licence requirements.

3. Reminder About The Land Farm Remedial Action Plan

Comment:

CIRNAC notes that the Action Remediation (AR) Plan identifies development of a Land Farm Remedial Action Plan as a key remediation measure, with submission proposed for Winter 2025–2026 and field implementation anticipated in Spring 2026 (AR Plan, Section 5.6; Section 7). At the time the Action Remediation (AR) Plan was submitted, the Land Farm Remedial Action Plan had not been submitted.

CIRNAC further notes that, under the Water Licence, plans required pursuant to the Licence form part of the regulatory approval framework and cannot be implemented unless reviewed and accepted by the Nunavut Water Board (Water Licence No. 3BM-KUG2030, Part B, Items 7–10).

Recommendation:

(R-03) CIRNAC recommends that the proponent submit the Land Farm Remedial Action Plan for regulatory review as proposed, in advance of any planned field activities, to allow regulators to assess the scope, methods, and compliance of the proposed works.

CIRNAC reminds the proponent that remediation activities not authorized by the current licence should not be undertaken at the land farm until the plan has been reviewed and approved by the Nunavut Water Board.

4. Non-Compliance Issues Not Addressed In The Action Remediation Plan**Comment:**

CIRNAC notes that the 2024 Inspection Report identified non-compliance issues requiring action, as documented under Section 3 of the 2024 Inspection Report and several of these items are not clearly addressed in the Action Remediation (AR) Plan. Specifically:

- the AR Plan does not address installation of flow meters on the decanting line, which is required under Part B, Item 6 of the Water Licence;
- while erosion mitigation is proposed for the backwash pond, the AR Plan does not address the ongoing active leakage, cracking, and slumping of the sewage lagoon east wall and the erosion caused by trucks discharging into the lagoon, identified in the 2024 Inspection Report (Section 1, item 2, 5 and 6; Section 2 item 1; Section 3); and
- the AR Plan references improvements to hazardous waste storage, but does not clearly confirm whether issues related to consolidation and segregation of hazardous wastes and white wastes identified in the 2024 Inspection Report have been fully resolved (AR Plan, Sections 5.2–5.6; 2024 Inspection Report Section 3).

CIRNAC notes that it is unclear from the information provided whether these action items have been completed, or, if outstanding, when they are proposed to be addressed.

Recommendation:

(R-04) CIRNAC recommends that the proponent clarify the status of the non-compliance items identified in the 2024 Inspection Report, including whether the actions required have been completed or, if not, how and when they are proposed to be addressed. CIRNAC further recommends that the AR Plan propose remediation measures to all outstanding inspection findings, to ensure compliance with Water Licence conditions.