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

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

Your file - Votre référence
3BM-PON2025
Our file - Notre référence
GCDocs#147639243

16 October, 2026

Robert Hunter
Licensing Administrator
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 Licence Amendment/Renewal Application for Hamlet of Pond Inlet, Type B Water Licence No. 3BM-PON2025

Dear Robert Hunter,

Thank you for the 22 September 2026 invitation to review licence amendment and renewal application for Type B Water Licence No. 3BM-PON2025.

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*. Please find CIRNAC comments and recommendations in the attached Technical Memorandum.

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 William Quere at william.quere@rcaanc-cirnac.gc.ca or (873) 452-1981 Or Andrew Keim at (867) 975-4550 or Andrew.keim@rcaanc-cirnac.gc.ca.

Sincerely,

Quere, William
Digitally signed by Quere, William
Date: 2026.10.16 14:07:15 -06'00'

William Quere, BSc
Regional Coordinator

Canada

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Technical Review Memorandum

Date: 16 October 2026

To: Robert Hunter – Licensing Administrator, Nunavut Water Board

From: William Quere – Regional Coordinator, CIRNAC

Subject: **Crown-Indigenous Relations and Northern Affairs Canada's Review of the Licence Amendment/Renewal Application for Hamlet of Pond Inlet, Type B Water Licence No. 3BM-PON2025**

Region: ☐ Kitikmeot ☐ Kivalliq ☒ Qikiqtani

A. BACKGROUND

The Hamlet of Pond Inlet is applying for an amendment and renewal for their water licence 3BM-PON2025. They are applying for a two year licence while they expand their water supply facility and the associated reservoir. While the current licence provides an allowance of 299 m^3 a day up to 90,000m^3 per year, the new reservoir will have a capacity of at least 166,846 m^3.

It is noted that this change had the NPC estimate the new water use per year to 2,051m^3 a day and 166,846 per year. This is the size of the upgraded reservoir which can be filled in eight days. This would put the Hamlet well into a Type A licence. This renewal however will maintain their current use while construction is ongoing. To this end, a water supply facility operation & Maintenance Plan was provided and includes plans and drawings for the new facility and associated construction.

Also supplied with this amendment/renewal was the annual report with compliance plan. This plan currently lists the Hamlet non compliant in 8 categories with short term and long term plans aimed toward compliance.

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	Operation & Maintenance Plan for Municipal Water Licence: Water Supply Facilities
R-02	Annual Report
R-03	Licence Noncompliance
R-04	Sewage Disposal Facilities O&M 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
260821 3BM-PON2025 Letter or Authorization-IMLE	August 2026, Municipality of Pond Inlet
260908 3BM-PON2025 260813-26WA001-Mar 2026 NPC Conformity Determination-IR3E	March 2026, NPC
260908 3BM-PON2025 Pond Inlet - Environmental Emergency Contingency Plan-ILAE	March 2025, Government of Nunavut
260908 3BM-PON2025 Pond Inlet - Environmental Monitoring and QA QC Plan Version-ILAE	March 2025, Government of Nunavut
260908 3BM-PON2025 Pond Inlet - OM Plan Sewage Disposal Facility-ILAE	March 2025, Government of Nunavut
260908 3BM-PON2025 Pond Inlet - OM Plan Solid Waste Disposal Facility-ILAE	March 2025, Government of Nunavut
260908 3BM-PON2025 Pond Inlet - OM Plan Water Supply Facility Sept 2026-ILAE	September 2026, Dillon Consulting
260908 3BM-PON2025 Pond Inlet 2025 Annual Report-ILAE	N/A
260908 3BM-PON2025 Pond Inlet Compliance Plan-ILAE	N/A
260908 3BM-PON2025 Pond Inlet_IFC Civil Drawings_Sealed_Signed-ILAE	April 2026, Government of Nunavut
260908 3BM-PON2025 Renewal and Amendment Cover Letter-ILAE	September 2026, Dillon Consulting

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Document Title	Author, File No., Rev., Date
260908 3BM-PON2025 Renewal and Amendment Executive Summary-ILAE	N/A
260915 3BM-PON2025 Application for Water Licence Amendment and Renewal_Revised-ILAE	September 2026, Government of Nunavut and Municipality of Pond Inlet
260922 3BM-PON2025 26WA001-NIRB Ltr Re Screening Decision Report-OT5E	September 2026, NIRB
260922 3BM-PON2025 26WA001-Screening Decision Report-OT5E	September 2026, NIRB
NWB Replacement Water Licence No: 3BM-PON2025	NWB, June 10 2020

C. RESULTS OF REVIEW

1. Operation & Maintenance Plan for Municipal Water Licence: Water Supply Facilities

Comment:

The O&M Plan for the Water Supply Facilities contain drawing's with an approximate 30 m offset from the water. The standard for buildings and activities is a distance of at least thirty-one (31) metres from the ordinary High Water Mark. While it is understood that work near water is required for this facility, the facility placement appears to be short of the standard. There is a concern that the minimum distance is not being adhered to in this construction.

Erosion and Sediment controls are mentioned in the appendix but are not included in the main document body. These controls also don't appear to cover the full area of the proposed construction. The concern is that the planned Erosion and Sediment controls may be inadequate for the given project.

Recommendation:

(R-01) CIRNAC recommends the applicant ensure an adequate offset of 31 m to the ordinary high water mark for any water body is being adhered to in all plans as required by licence.

Further, the Full Erosion and sediment Control plans should be added to the main document while ensuring that erosion and sediment controls are wholly inclusive of the proposed construction and life of the facility.

2. Annual Report

Comment:

The Compliance plan references a breach in the lagoon berm wall where untreated sewage is spilling onto the surrounding landscape. The compliance plan refers to the issue as ongoing, with a short term fix coming in the next two months. The concern is that the annual report part III does not mention the unauthorized discharge. Part II also does not mention any maintenance done to waste disposal facilities for 2025.

Recommendation:

(R-02) CIRNAC recommends that the applicant clarify whether there have been unauthorised discharges, maintenance to facilities, or other details necessary for the Annual Report in general and in relation to the compliance report.

3. Licence Noncompliance

Comment:

In the Pond Inlet Compliance Plan, 8 issues of noncompliance have been identified. The concern is that multiple issues were identified in 2021 and are still ongoing. The plan is also undated which makes it difficult to determine the timeline of the short term and long term schedules presented.

Recommendation:

(R-03) CIRNAC recommends the applicant confirm when the plan was updated and what immediate actions have already been taken for the noncompliant issues.

4. Sewage Disposal Facilities O&M Plan

Comment:

The change log of the Sewage Disposal Facilities O&M plan mentions additions of open burning best practices and leachate management information. The concern is that these were not found within this document.

Recommendation:

(R-03) CIRNAC recommends the applicant confirm if these items have been added to the plan or provide an updated plan containing them if they were not.