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-RAN2025
Our file - Notre référence
GCDocs#151433939

November 6, 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 and Renewal Application for the Municipality of Rankin Inlet Project, Type B Water Licence No. 3BM-RAN2025.

Dear Robert,

Thank you for the October 7, 2026 invitation to review the referenced licence 3BM-RAN2025, submitted by the Municipality of Rankin Inlet, for Type B Water Licence No. 3BM-RAN2025.

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* and 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

Canada

Technical Review Memorandum

Date: November 6, 2026

To: Robert Hunter – Licensing Administrator, Nunavut Water Board

From: Pauline Firmin – Regional Coordinator, CIRNAC

Subject: Crown-Indigenous Relations and Northern Affairs Canada's Review of the Licence Amendment and Renewal Application for the Municipality of Rankin Inlet Project, Type B Water Licence No. 3BM-RAN2025.

Region: ☐ Kitikmeot ☒ Kivalliq ☐ Qikiqtani

A. BACKGROUND

The Municipality of Rankin Inlet is located in the Kivalliq Region of Nunavut on the western shore of Hudson Bay at approximately 62°48'N latitude and 92°05'W longitude. The Municipality operates its solid waste management facilities under Type B Water Licence No. 3BM-RAN2025. The licensed facilities include the municipal landfill, hazardous waste storage area and associated waste management infrastructure.

The Municipality has applied to renew and amend Water Licence 3BM-RAN2025. The application proposes several administrative and operational changes including: extending the licence term to twenty years; removing requirements associated with the uncommissioned New Landfill; removing Landfarm-related conditions and monitoring requirements; removing or modifying certain engineering inspection requirements; and updating management plans submitted in support of the licence renewal. The application states that contaminated soils are now managed under a separate GN-operated Landfarm authorized under Water Licence No. 1BR-RAN2131 and that the historic Landfarm regulated under 3BM-RAN2025 is no longer accepting contaminated soils.

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	Removal of the Historical Landfarm and Associated Monitoring Requirements
R-02	Application of Licenced Effluent Quality Limits To Monitoring Station RAN-2
R-03	Continued Utilisation of the Old Landfill
R-04	Spill Kit Location
R-05	Estimation of Waste Volume
R-06	Non-Compliance Items
R-07	Surface Water Management
R-08	Inspection of Facilities
R-09	Length of Licence Term

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
Application for Water Licence Amendment	Municipality of Rankin Inlet, October 5, 2026
Environmental Emergency Contingency Plan for Municipal Water Licence	Municipality of Rankin Inlet, November 2025
Environmental Guideline for Used Oil and Waste Fuel	Department of Environment, Government of Nunavut, June 2012
Operation & Maintenance Plan for Municipal Water Licence : Solid Waste Disposal Facilities	Municipality of Rankin Inlet, October 2025
Plan for Compliance Licence NO:3BM-RAN2025	Municipality of Rankin Inlet

Document Title	Author, File No., Rev., Date
Water Licence 3BM-RAN2025	Nunavut Water Board, December 2, 2020
2021 Annual Report for the Hamlet of Rankin Inlet	Hamlet of Rankin Inlet
2023 Annual Report for the Municipality of Rankin Inlet	Municipality of Rankin Inlet
2024 Annual Report for the Municipality of Rankin Inlet	Municipality of Rankin Inlet
2025 Annual Report for the Municipality of Rankin Inlet	Municipality of Rankin Inlet

C. RESULTS OF REVIEW

1. Removal of the Historical Landfarm and Associated Monitoring Requirements

Comment:

CIRNAC notes that the proponent is requesting removal of the historical Landfarm and associated monitoring requirements from the Water Licence, because the facility has not accepted contaminated soil since 2009 and is considered inactive (Amendment Justification Summary). However, the Amendment Justification Summary indicates that abandonment and restoration of the Landfarm has not occurred yet and is contingent on future funding availability. The proponent further states that soil testing and restoration activities will only be undertaken when funding is available.

CIRNAC also notes that Licence Condition part F item 10 (Water Licence 3BM-RAN2025), requiring submission of a Landfarm Operational Contingency Plan to address seepage from the facility, remains identified as non-compliant in the submitted Plan for compliance. It is unclear whether the seepage from the landfarm is still a concern in 2026 due to lack of monitoring data. In the 2021 to 2025 period, no water quality results are available for the landfarm sampling stations RAN-4 (Discharge from the landfarm at the controlled point of release), RAN-5 (Monitoring well located up gradient of the landfarm) and RAN-6 (Monitoring well located down gradient of the landfarm) (2025 Annual Report, 2024 Annual Report, 2023 Annual Report, 2021 Annual report).

Given that abandonment and restoration have not been completed, and that seepage from the facility was previously identified as a concern in the 2020 renewal of the licence, continued water monitoring at the landfarm may still be necessary. The proposed removal of landfarm-related monitoring requirements may therefore pose a risk to the receiving environment.

Recommendation:

(R-01) CIRNAC recommends that the Nunavut Water Board retain the historical landfarm and associated monitoring requirements in the renewed water licence and confirm whether the proponent is still required to produce a landfarm Operational Contingency Plan for the historical landfarm.

2. Application of Licenced Effluent Quality Limits To Monitoring Station RAN-2

Comment:

CIRNAC notes that the 2025 Annual Report applies the Effluent Quality Limits (EQLs) contained in the licence (Water Licence 3BM-RAN2025, part D, item 8) to Monitoring Station RAN-2, which monitors runoff from the Old Landfill (2025 Annual Report, Appendix B). Under Water Licence 3BM-RAN2025, the EQLs are explicitly associated with discharge of Effluent from the landfarm at Monitoring Station RAN-4, where

petroleum hydrocarbon–impacted soil treatment is the primary activity. The Licence does not identify EQLs applicable to landfill runoff at RAN-2, nor does it describe landfill discharge as being regulated under the Landfarm effluent criteria.

Landfill runoff and landfarm effluent are distinct waste streams with different potential contaminant profiles, and the reassignment of regulatory limits between monitoring stations may not reflect the contaminants of concerns for the landfill.

Recommendation:
(R-02) CIRNAC recommends that the proponent clarify the rationale for applying Landfarm-specific EQLs from monitoring station RAN-4 to landfill runoff at Monitoring Station RAN-2 and whether this approach has been reviewed and approved by the Nunavut Water Board.

3. Continued Utilisation of the Old Landfill

Comment:
CIRNAC notes that the applicant proposes to continue operations at the existing Old Landfill and remove requirements associated with the uncommissioned New Landfill. The application states that future waste management activities will rely on optimization and continued use of the Old Landfill (Application for Water Licence Amendment, section 9).

However, during the previous licence renewal, concerns were identified regarding the remaining capacity and long-term viability of the Old Landfill, which formed part of the rationale for pursuing development of the New Landfill (Water Licence 3B-RAN2025, IV. Solid Waste). Given that the New Landfill remains inactive and no information has been provided regarding the current remaining capacity, expected operational lifespan, or the status of proposed optimization measures for the Old Landfill, it is unclear whether the facility has sufficient capacity to accommodate waste disposal needs throughout the proposed licence term, or when available capacity may be added due to optimization.

Recommendation:
(R-03) CIRNAC recommends that the proponent provide additional information regarding:

1) The current capacity and projected remaining operational life of the Old Landfill, including any available estimates of remaining disposal capacity;
2) The status of the proposed optimization measures of the Old Landfill and whether they would be sufficient to support continued operation of the optimized facility for the duration of the proposed licence term.

4. Spill Kit Location

Comment:

CIRNAC notes that the hazardous waste storage area contains various hazardous materials, including waste fuel, used oil, batteries, and other hazardous wastes, as identified in Environmental Emergency Contingency Plan.

The Environmental Emergency Contingency Plan identifies the municipal spill kit as being located at the Con-Shed near the community gas station (Section 6.2, Spill Response Equipment Inventory). It also states that spill kits should be kept nearby when hazardous substances are transferred or managed (Section 5.3.1, Hydrocarbon Mitigative Measures Secondary Containment), however the Plan does not identify any spill response equipment at the hazardous waste storage area.

CIRNAC further notes that the Environmental Guideline for Used Oil and Waste Fuel recommends that spill response equipment be located near used oil and waste fuel storage areas to enable a rapid response in the event of an accident (Section 3.2, Storage) and limit the risks to the receiving environment.

Recommendation:

(R-04) CIRNAC recommends that the proponent clarify whether spill response equipment is available at the hazardous waste storage area and, if so, identify its location within the *Environmental Emergency Contingency Plan*. If no spill response equipment is available on site, CIRNAC recommends that a spill kit be added to the hazardous waste storage area.

5. Estimation of Waste Volume

Comment:

CIRNAC notes that the Plan For Compliance identifies non-compliance with licence requirements related to determining and reporting the monthly and annual quantities of waste discharged to the Waste Disposal Facilities. The compliance plan indicates that the Municipality intends to estimate waste volumes using a per-capita calculation method rather than direct measurement.

Accurate determination of waste quantities is an important consideration for assessing landfill utilization and supporting long-term capacity planning. It is unclear whether the proposed estimation methodology will provide sufficient accuracy to meet the intent of the licence requirements.

Recommendation:
(R-05) CIRNAC recommends that the Nunavut Water Board determine whether the proposed method is appropriate for meeting the applicable licence requirements related to waste tracking and reporting.

6. Non-Compliance Items

Comment:
CIRNAC notes that the Plan for Compliance identifies Licence Conditions F-2-b, F-2-f, F-2-g, and F-2-h as non-compliant and indicates that the required information would be incorporated into the updated Operation and Maintenance Plan for the Municipality of Rankin Inlet Solid Waste Disposal Facility submitted in support of the licence renewal application.

However, CIRNAC was unable to locate information addressing these requirements in the submitted Operation and Maintenance Plan. Specifically, it does not appear to include information or procedures regarding:

1) F-2-b: Procedures for the testing and characterization of sewage sludge generated to ensure the materials are non-hazardous and proper storage and/or handling and disposal at the Waste Disposal Facilities are provided;
2) F-2-f: Though the Applicant has specified that no contaminated soil is currently accepted, the Applicant is required to state what the recommended depths of contaminated soil placed in the Landfarm is, for existing contaminated soils on site;
3) F-2-g: Independent third party sampling and testing of treated soil prior to removal from the Landfarm for reuse; and
4) F-2-h: Landfarm Effluent quality criteria in accordance with Part D.

For non-compliance items F-2-f, F-2-g and F-2-h, CIRNAC acknowledges that the historical landfarm is no longer accepting hydrocarbon-impacted soils and the proponent has requested its removal from the licence. However, abandonment and restoration activities have not yet been completed and the information required under these licence conditions remains part of the current water licence.

Recommendation:
(R-06) CIRNAC recommends that the proponent clarify if the requirements associated with Licence Conditions F-2-b, F-2-f, F-2-g, and F-2-h have been addressed and identify where the information is provided within the application package if it has. If the information is not available within the application package, CIRNAC recommends that the proponent provide the required information.

7. Surface Water Management

Comment:

CIRNAC notes that the Operation and Maintenance Plan identifies the potential for impacted water, including leachate and contact water associated with the landfill, hazardous waste storage area, and bulky metals area, to accumulate onsite (Section 8). It indicates that runoff from the landfill is monitored at Station RAN-2 and that, should water quality concerns be identified, consultation would occur to determine appropriate discharge options.

However, it is unclear within the plan how potentially contaminated water would be contained, managed, or prevented from being discharged to the receiving environment while discharge options are being evaluated. The discharge of impacted water could negatively impact the receiving environment and having clear contingency measures in place would help mitigate negative impacts.

Recommendation:

(R-07) CIRNAC recommends that the proponent clarify the contingency measures that would be implemented to contain and manage potentially contaminated water identified at the landfill, hazardous waste storage area, or bulky metals area pending a determination of appropriate discharge or treatment options.

8. Inspection of Facilities

Comment:

CIRNAC notes that the Water Licence contains the requirements that an inspection of all structure or facilities designed to contain, withhold, divert or retain Water or Waste be conducted by a geotechnical engineer annually and during the summer months at least one year prior the expiry of the licence (Water Licence 3BM-RAN2025, Part F items 5 and 6).

In the Plan for Compliance, the proponent indicate that the GN has contracted a consultant to study the recommended frequency of an engineer's inspection, with finding from this study expected to be completed in 2027. However, it is unclear if, while the study take place, the proponent has maintained the inspections required by licence condition Part F items 5 and 6.

Recommendation:

(R-08) CIRNAC recommends that the proponent clarifies whether the inspections required by licence condition Part F, items 5 and 6, have been carried out, whether the appropriate report has been submitted to the Nunavut Water Board, and whether an implementation plan addressing the engineer's recommendations is in place.

If these inspections have not been carried out, CIRNAC recommends that the proponent put a plan in place to ensure compliance in future.

9. Length of Licence Term

Comment:

CIRNAC notes that the proponent has requested a 20-year licence term, representing a significant increase from the current 5-year term. However, there is several non-compliant outstanding items and licence requirements identified in the Plan for compliance, such as outstanding requirement for a Landfarm Operational Contingency Plan addressing seepage and runoff management and providing a timeline for abandonment and restoration.

CIRNAC further notes that there has been a history of non-compliance with licence terms relating to monitoring and annual reporting. For example, the 2025, 2024 and 2023 annual reports are missing monitoring data from RAN-2, RAN-4, RAN-5 and RAN-6, and the 2022 annual report is not present in the NWB registry.

Additionally, uncertainties remain concerning the abandonment and restoration of the former Landfarm, as well as the long-term capacity and optimisation of the existing landfill, given the decision not to commission the New Landfill.

Given these uncertainties and compliance challenges, it is unclear whether the requested 20-year licence term is appropriate.

Recommendation:

(R-09) CIRNAC recommends that the Nunavut Water Board determine an appropriate licence term based on the information provided and the proponent's performance under the current and previous licences.