



Government
of Canada

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du Canada



March 19, 2026

Re: Re-initiating Discussion on SSTLs – Eureka HAWS Remediation Project

Dear Mark Konečný,

Thank you for reaching out to re-engage on the issue of Site Specific Target Levels (SSTLs) and the utilization of Jonny's hole for contaminated soil storage at Eureka.

After reviewing your questions, it is clear that Environment and Climate Change Canada (ECCC) and the Government of Nunavut Department of Environment (GN-ENV) are approaching the matter from fundamentally different assumptions. While GN-ENV acknowledges that the development of the SSTLs could potentially be refined to better account for site conditions, the central point remains that SSTLs are not intended to function as a "pollute-up-to" threshold. From the perspective of GN-ENV and Crown Indigenous Relations and Northern Affairs Canada (CIRNAC), the placement of contaminated soil at Johnny's Hole, without proper containment, would constitute the creation of a new contaminated site without a corresponding net environmental benefit.

Should ECCC wish to proceed with the reapplication of the amendment to allow for depositing contaminated soil at Johnny's Hole, measures would need to be implemented to prevent the migration of contamination. At a minimum, this would include capping the area, establishing a monitoring program for potential leachate, providing a clear monitoring schedule, and developing a contingency plan if leachate migration is detected. Note that a full amendment application would first need to go through the Nunavut Planning Commission and Nunavut Impact Review Board determination before it goes through the Nunavut Water Board for review.

CIRNAC expects the amendment process will take approximately one year to complete in which time GN-ENV and CIRNAC expect to be provided the above information. The amendment application GN-ENV and CIRNAC are looking for should resemble that of a Proponent applying to dispose of contaminated soils rather than the application to change the SSTLs.

Sincerely,

Keim,
Andrew

Digitally signed
by Keim, Andrew
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CC: Nunavut Planning Commission, Nunavut Impact Review Board, Nunavut Water Board