



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

Your file - Votre référence
8BC-INP-----
Our file - Notre référence
GCDOCS#143851565

May 8, 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 new Licence Application for Iqaluit Nukkiqsautiit Project, Type B Water Licence No. 8BC-INP-----

Dear Richard Dwyer,

Thank you for the 14 April 2026 invitation to review the new licence application, submitted by Nunavut Nukkiqsautiit Corp, for Type B Water Licence No. 8BC-INP-----.

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,

William Quere, BSc
Regional Coordinator

Canada 



Technical Review Memorandum

Date: 8 May 2026

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

From: William Quere – Regional Coordinator, CIRNAC

Subject: **Crown-Indigenous Relations and Northern Affairs Canada’s Review of the new Licence Application for Iqaluit Nukkiksautiit Project, Type B Water Licence No. 8BC-INP----**

Region: Kitikmeot Kivalliq Qikiqtani

A. BACKGROUND

The Iqaluit Nukkiksautiit Project (the Project) is looking to become the first hydro power project in Nunavut and will supply energy to Iqaluit. In 2020 the Nunavut Nukkiksautiit Corporation (NNC) began work on this project in association with the Qikiqtani Inuit Association (QIA). Initial studies began in 2025 to study a river and reservoir 60 kilometers north of Iqaluit. These studies examined the land, plants, and animals which form the basis of their current planned studies for the 2026 field season. The planned studies for this season are wildlife, vegetation, and soil surveys as well as aquatic, hydrological, and atmospheric studies to name a few. This work will also include geotechnical drilling in previously located areas. This drilling was one of the factors that changed this project to the current licence application for Type B water licence 8BC-INP----. The application is for five years.

The 2026 field season will consist of a camp of 30 people supported by a helicopter and twin otter. There are 36 boreholes planned around the proposed dam area as well as along adjacent water bodies. NNC intends to use up to 165 m³ of water a day.

CIRNAC noted, from the Non-Technical Project Description, that

“These studies are strictly for information gathering and do not authorize construction of the hydropower project. The results will help determine whether a full project can proceed and will support future Nunavut Planning Commission (NPC) conformity reviews, Nunavut Impact Review Board (NIRB) screening, and Environmental Impact Statement (EIS) requirements. All work described in this submission is temporary, low-impact, and limited to accessing the area to collect data needed for planning”.

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	Spill Kits and Hazardous Material Storage Area
R-02	Fuel management
R-03	Sump Location and Filtration Method
R-04	Waste Management
R-05	Final Closure
R-06	Timeline discrepancies
R-07	Financial Information
R-08	Security Information
R-09	Studies Undertaken to Date

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
260220 8BC-INP--- 250716 8WLC-INP2526 Approval OAKE-IMLE.pdf	NWB, July 2025
260220 8BC-INP---- # 13 Table of water quantities from each source-IMLE.pdf	NNC, April 2025
260220 8BC-INP---- # 7 2026-01-16 NPC File No. 150981 Investigative Studies for the Iqaluit Nukkiksautiit Project-IMLE.pdf	NPC, Jan 2026
260220 8BC-INP---- # 9 NPC - Nontechnical Project Description 2026 English-IMLE.pdf	NNC, Dec 2025
260220 8BC-INP---- #20 2025-11-10_INP_NIRB_Consultation IMLE.pdf	Summary_v.2- NNC, 2025
260220 8BC-INP---- #27 NIRB approval letter 250707-25YN033-Cover Ltr Re Screening Decision Report-FSGE-IMLE.pdf	NIRB, July 2025
260220 8BC-INP---- #5 Map of Proposed Water Extraction Locations-IMLE.pdf	NNC, Feb 2026
260220 8BC-INP---- #6 N2025N0016 _NNC LUP Facepage - CIRNAC-IMLE.pdf	CIRNAC, Aug 2025
260220 8BC-INP---- 2. NWB-R1-	NNC, ND



Document Title	Author, File No., Rev., Date
TouristRemoteCamp-SIG-kt -Investigative Studies for the INP-IMLE.xls	
260220 8BC-INP---- 3. English Executive Summary of Water Use Licence Application - INP-IMLE.pdf	NNC, ND
260220 8BC-INP---- 4. Inuktitut Executive Summary of Water Use Licence Application - INP-IMLE.pdf	NNC, ND
260220 8BC-INP---- Application for Water Licence-IMLE.pdf	NNC, Feb 2026
260220 8BC-INP---- Campsite Location - Map provided to CIRNAC-IMLE.pdf	NNC, July 2025
260220 8BC-INP---- Iqaluit Nukkiksautiit Project SPRP V1-IMLE.pdf	NNC, July 2025
260220 8BC-INP---- List of Application Submissions Iqaluit Nukkiksautiit Project-IMLE.pdf	NNC, Feb 2026
260220 8BC-INP---- Navigation Protection Program Registry - File No. 2025-615376-IMLE.pdf	GOC, July 2025
Abandonment & Restoration Plan	NNC, April 2026



C. RESULTS OF REVIEW

1. Spill Kits and Hazardous Materials Storage Area

Comment:

Spill kits are mentioned in section 5.2 of the Spill Prevention & Response Plan but it does not detail their locations relative to fuel or hazardous material locations. The concern is that without this description, CIRNAC cannot determine if the kit coverage is adequate for the project.

Recommendation:

(R-01) CIRNAC recommends that spill kit positions and hazardous material storage locations be provided.

2. Fuel Management

Comment:

Elements of a Fuel Management Plan are missing including secondary containment dimensions and materials, location of the designated refueling area, fuel storage conditions and monitoring, spill kit availability, and how fuel will be transported to and around the site. The concern is that without these items, water and the environment at the site are at greater risk.

Recommendation:

(R-02) CIRNAC recommends that a Fuel Management Plan be created for current and future operation of the camp. This is to include how fuel is handled, where it is stored, empty fuel barrel use and disposal, removal schedule for empty fuel barrels, fuel related locations, etc. All fuel activities and storage must be at a minimum distance of thirty-one (31) metres from the ordinary High Water Mark of any water body.

3. Sump Location and Filtration Method

Comment:

The Non-Technical Project Description does not describe the greywater sump location relative to camp and the high water mark of any nearby waterbodies. The document also notes that there will be a primary settling basin with a shallow, lined trench or sump which allows solids and grease to settle out. It is unclear if this first settling basin is located



directly on the land which would constitute a spill rather than a separate filtration device. Solids and grease must be removed prior to entering the sump in a manner that does not allow the solids and grease to enter the environment. The concern is that without the location and details on grease and solids filtration, CIRNAC cannot determine the sumps environmental risk.

Recommendation:

(R-03) CIRNAC recommends NNC provide the location relative to water bodies and camp facilities, and filtration information on grease and solids. All sumps must be located a minimum distance of thirty-one (31) metres from the ordinary High Water Mark of any water body where direct flow into any water body is not possible. CIRNAC would also note that care should be taken such that wildlife do not enter the sump.

4. Waste management

Comment:

Waste management is unclear in areas throughout the nontechnical summary as well as the General Application itself. It is unclear where waste from the outhouses will be stored as well as to how and when it will be removed from the pit. While food waste is said to be stored securely in a storage tent, it is unclear where any other waste mentioned in the General Application will be stored, transported out, or their distance from water.

Recommendation:

(R-04) CIRNAC recommends the applicant provide the methods and processes for collecting, storing, treating and discharging their waste. This is to include waste not listed in their application such as solid waste (ie Paper, plastic, wood, burlap, food wastes) and bulky items (such as empty drums). Indicate the capacity of these storages as well as their location relative to the camp and nearby waterbodies. Waste management activities must be a minimum distance of thirty-one (31) metres from the ordinary High Water Mark of any water body. As this will be an ongoing project, CIRNAC recommends a Waste Management Plan be created prior to commencement of the project.

5. Final Closure

Comment:

Section 3.1.9 of the abandonment and restoration plan states



“Upon completion of abandonment and restoration activities, a final inspection of the site will be conducted to verify that all Project components have been removed and that no environmental hazards remain. This inspection will be carried out by the Project team and will include confirmation that closure objectives have been achieved. Photo documentation of site conditions will be collected to support verification of restoration activities. A summary of demobilization and restoration activities may be prepared for submission to regulators, if required.

A summary of demobilization and restoration activities may be prepared for submission to regulators, if required. Supporting documentation will be compiled and retained, including waste manifests, disposal records, spill/incident reports, and any corrective actions undertaken. These records will be maintained to demonstrate compliance with approved procedures and to support regulatory review if requested.”

The concern is that these abandonment and restorative activities with documentation should be regularly submitted to the NWB and CIRNAC.

Recommendation:

(R-05) CIRNAC recommends NNC provide the documentation collected for progressive and final reclamation to be submitted with annual reports or as requested by regulators. Further, for final closure, CIRNAC would recommend that areas of disturbed vegetation, including those at the camp, fuel caches, and drill sites, be photographed and managed in consultation with the CIRNAC Inspector.

6. Timeline Discrepancies

Comment:

In the Non-Technical Summary, the stated timeline for camp is

“A 30-person temporary base camp will be established near the head of the unnamed lake. It will be active beginning in May 2026 to mid-October of 2026.”

While the Abandonment and Restoration plan states the timeline as

“To support the continued investigative field programs, NNC will re-establish a 30-person temporary base camp near the head of the unnamed lake. It will be active beginning in June 2026 to mid-October 2026 and June 2027 to mid-October 2027.”

Understanding that this is intended to be a long term project, the concern is that the timeline and ongoing activities remain unclear.

**Recommendation:**

(R-06) CIRNAC recommends the applicant clarify the timelines relevant to current work under this Type B licence application that they are currently aware of and ensure future submissions provide the same consistency.

7. Financial Information**Comment:**

The general application, section 22, requires NNC to

“Provide a statement of financial responsibility.

If the applicant is a business entity, provide a list of the officers of the company.

If the applicant is a business entity attach a copy of the Certificate of Incorporation or evidence of

registration of the company name”.

The concern is these items were not provided and are necessary for review.

Recommendation:

(R-07) CIRNAC recommends NNC provide the required financial information.

8. Security Information**Comment:**

The general application in section 21 requires NNC to

“Provide an estimate of the total financial security for final reclamation equal to the total outstanding reclamation liability for land and water combined sufficient to cover the highest liability over the life of the undertaking. Estimates of reclamation costs must be based on the cost of having the necessary reclamation work done by a third party contractor if the operator defaults. The estimate must also include contingency factors appropriate to the particular work to be undertaken. Where applicable, the financial security assessment should be prepared in a manner consistent with the principals respecting mine site reclamation and implementation found in the Mine Site Reclamation Policy for Nunavut, Indian and Northern Affairs Canada, 2002”.

The concern is that the provided answer does not meet this requirement as no estimate was given.

**Recommendation:**

(R-08) CIRNAC recommends NNC provide the required security information.

9. Studies Undertaken to Date**Comment:**

Section 23 of the general application requires the applicant to

“List and attach copies of studies, reports, research, etc”.

The concern is that while studies were listed, they were not attached to the application.

Recommendation:

(R-09) CIRNAC recommends NNC provide the required studies.