

GN-01	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Terrestrial Environment
References	<ul style="list-style-type: none"> • Peter's Expediting Ltd. NIRB Application for Screening #126228 Pelly Lake Overland Haul (September 2025) • Salumaq Environmental Contracting Ltd. Draft Winter Trail Plan. (May 2025)
IDENTIFICATION OF ISSUE	
<p>The Government of Nunavut (GN) notes that the documents provided by Peter's Expediting Ltd (PEL; the Proponent) for screening of the Pelly Lake Overland Haul Project (the Project) lack sufficient detail to justify the proposed trail routing. In particular, the materials do not adequately describe the terrestrial environmental conditions along the route, nor do they explain how potential impacts were considered or how avoidance and mitigation measures influenced the routing decision. The GN needs this information to assess potential effects from the Project on the terrestrial environment.</p>	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p>The Project entails a 300-kilometre-long route traversing both land and ice, designed for heavy vehicles transporting hazardous materials. Given the nature and scale of the route, the GN believes there could be many opportunities for project impacts on the terrestrial environment. The potential effects may be direct or indirect and will be different depending on the types of ecological communities being traversed.</p> <p>The GN understands that an aerial scouting trip was planned for July 2025, with the intention to,</p> <p style="padding-left: 40px;">“...provide information on topography, hydrology, soils, permafrost, geotechnical properties, wildlife habitat, and heritage resources. The scouting trip will also identify areas that should be avoided or that will require special management. Pre-development planning and investigations will also provide a baseline record of environmental data that will help in setting reclamation goals...” (Salumaq Environmental Contracting Ltd., 2025, p.8)</p> <p>Upon reviewing the Project materials, the GN notes that no results or findings from this aerial scouting trip have been provided by the Proponent. As such, it remains unclear which areas have been flagged by the Proponent for avoidance or specific management. Section 3.1.1 of the Proponent's draft Winter Trail Plan offers only general routing considerations in relation to natural features.</p>	

REQUEST(S)/RECOMMENDATION(S)

The GN requests that the Proponent provide the following:

- The results of the July 2025 aerial scouting trip including descriptions of the terrestrial environment and high-resolution maps of the proposed area along the proposed trail route.
- Supporting data such as the length of trail over land, vegetation community types, and wildlife habitat features.
- A description of potential effects on the terrestrial environment, in particular, wildlife that may use the area during the planned activities.
- Specific details on avoidance and mitigation measures to be implemented to prevent or minimize impacts on the terrestrial environment.

GN-02

Department	Environment
Organization	Government of Nunavut
Subject/Topic	Wildlife Management Plan
References	<ul style="list-style-type: none"> • Peter’s Expediting Ltd. NIRB Application for Screening #126228 Pelly Lake Overland Haul (September 2025) • Salumaq Environmental Contracting Ltd. Draft Winter Trail Plan. (May 2025)

IDENTIFICATION OF ISSUE

The GN notes that the Project proposal lacks specific mitigation measures for wildlife, such as caribou and muskox. The GN needs this information to assess potential effects from the Project on the terrestrial environment, particularly for terrestrial wildlife.

IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE

The Project has the potential to cause both direct and indirect effects on wildlife, such as, but not limited to, caribou and muskox. Direct effects could stem from disturbance or stress due to noise and human activity. Indirect effects may also result from damage to winter food sources such as lichens, either through trail construction and vehicle movement or through accidental spills.

The GN notes that the Project proposal lacks specific mitigation measures for wildlife, which are often included in a wildlife management plan. This information is required for the GN to complete its assessment of potential environmental effects and impacts from the Project.

REQUEST(S)/RECOMMENDATION(S)

The GN requests that the Proponent undertake the following:

- Develop and implement a specific and comprehensive wildlife mitigation and monitoring plan that contains measures (as applicable) such as, but not limited to:
 - Yielding the right of way to terrestrial wildlife when operating vehicles on the trail
 - Reducing vehicle speed (e.g., to 30 km/hour) if terrestrial wildlife is observed near the trail (e.g., within 500 m to 1 km)
 - Pausing vehicle use on the trail during periods of low visibility
- Route the trail to avoid areas of dense lichen growth, which serves as an important winter food source for caribou using available data (e.g., data collected from the Proponent's 2025 aerial scouting program or through community engagements).
- Develop and implement a specific and comprehensive spill prevention and contingency plan.

GN-03

Department	Environment
Organization	Government of Nunavut
Subject/Topic	Spill Prevention and Spill Contingency Planning
References	<ul style="list-style-type: none"> • Salumaq Environmental Contracting Ltd. Draft Winter Trail Plan. (May 2025) • Aboriginal Affairs and Northern Development Canada. Application for Land Use Permit, N2015F0001 (January 2015) • Peter's Expediting Ltd. Spill Response Policy (February 2022)

IDENTIFICATION OF ISSUE

The GN notes that the Project's Spill Response Policy requires greater detail on spill prevention and response. The GN needs this information to assess potential effects from the Project on the terrestrial environment, particularly from potential spills.

IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE

The Proponent's Draft Winter Trail Plan and the application originally submitted to Aboriginal and Northern Affairs Canada (now Crown-Indigenous Relations and Northern Affairs Canada, CIRNAC) indicate that the Proponent intends to transport 20,000 litres of diesel, 15,000 litres of aviation fuel, 100 litres of gasoline, garbage, sewage, and an unspecified volume of hazardous and non-hazardous waste over an approximately 300-kilometre-long winter trail. The volume and nature of these materials, combined with the remote location and challenging winter conditions, pose a significant risk of environmental contamination in the event of a spill.

The GN notes that the Proponent's Spill Response Policy lacks sufficient detail on spill prevention measures, which are necessary to properly assess and mitigate this risk.

REQUEST(S)/RECOMMENDATION(S)

The GN recommends that the Proponent undertake the following:

- Develop and implement a specific and comprehensive Spill Response Plan that contains measures (as applicable) including:
 - Clearly defined refuelling procedures for the CATs operating outside of Baker Lake (if applicable).
 - Clearly defined procedures for the transfer of fuel and other substances to tanks for transportation.
 - Use of bulk fuel tanks with double-wall containment.
 - Provision of appropriate spill kits in all vehicles.
 - Inclusion of a Spill Response Plan in every vehicle, complete with current contact information for the appropriate spill response contact.
 - Adaptation of the Spill Response Plan to reflect potential delays in accessing the site by professional responders in the event of a spill.
 - Information about spill response training completed by staff and/or subcontractors prior to beginning operations.