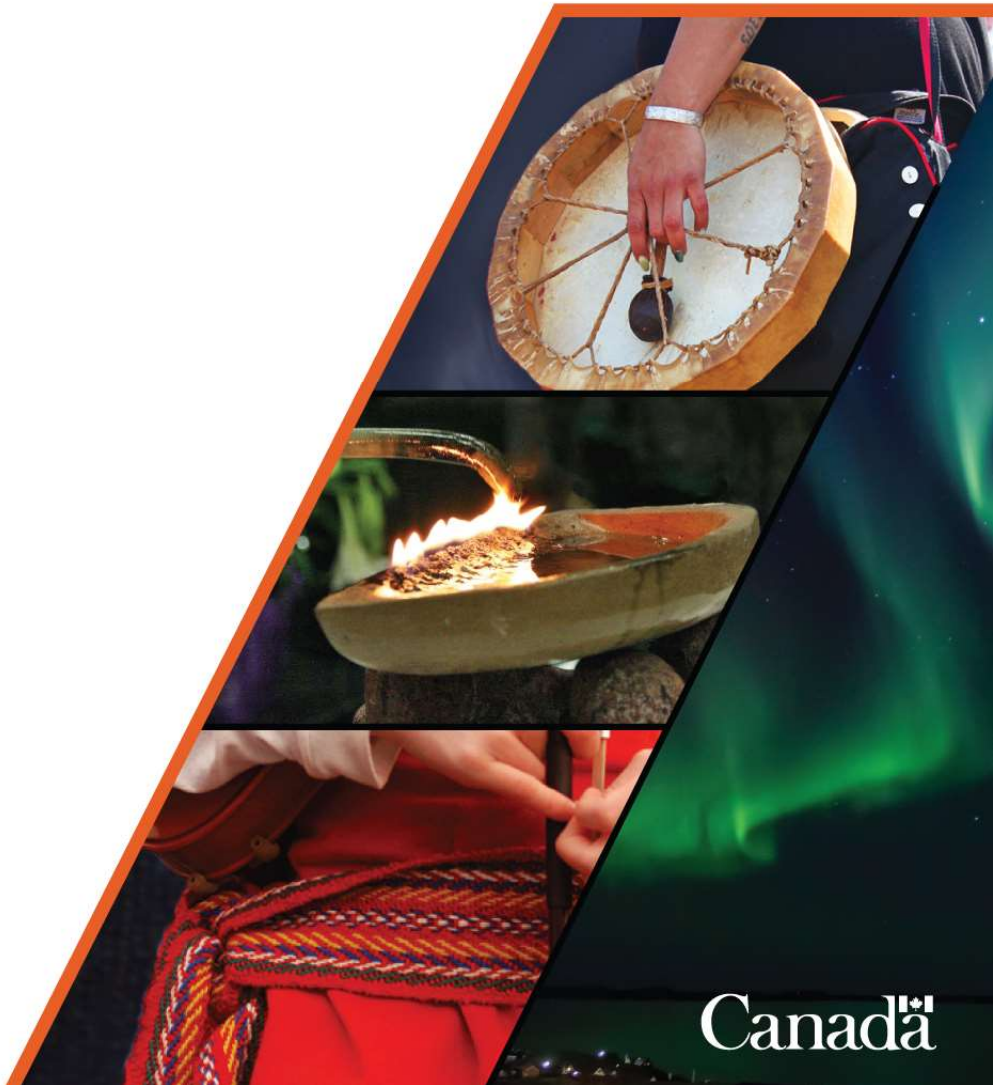




CIRNAC Comments to NIRB

Re: Notice of Screening for Peter's Expediting Ltd.'s
"Pelly Lake Overland Haul" Project Proposal



Nunavut Regional Office
918 Sivumugiaq Street
Iqaluit, NU, X0A 3H0

Your file - Votre référence
25RN070
Our file - Notre référence
GCdocs# 140592476

October 16, 2025

Mia Beattie
Impact Assessment Officer
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU, X0B 0C0
via NIRB public registry

Re: Notice of Screening and Comment Request for Notice of Screening for Peter's Expediting Ltd.'s "Pelly Lake Overland Haul" Project Proposal

Dear Mia Beattie,

On September 25, 2025, the Nunavut Impact Review Board (NIRB) invited parties to comment on Peter's Expediting Ltd.'s "Pelly Lake Overland Haul" project proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) offers the responses below as it pertains to the NIRB's request:

Whether the project proposal is of a type where the potential adverse effects are highly predictable and mitigable with known technology

CIRNAC is of the view that the potential impacts of the proposed Project can be mitigated with known practices or technology.

CIRNAC #1: Fuel and Hazardous Material Handling

The project indicates 20,000 L of diesel will be used. The Spill Response Policy includes reporting and cleanup procedures, but the application only summarizes it and does not explain how it will work in the field. Details such as per-train fuel limits, where spill kits will be staged, how mobile refueling will be done, and containment for any stationary storage are not described. This creates uncertainty about how spills will be prevented and managed in extreme cold. CIRNAC suggests the Proponent consider:

- Explaining how the existing Spill Response Policy will be applied during operations, including kit locations and responsibilities;
- Stating per-train fuel limits and confirming containment and setback measures for any storage;
- Describing refueling steps (e.g., grounded pumps, drip trays) and how these will be documented; and,



- Outlining how spills on snow or ice will be contained and removed.

CIRNAC #2: Permafrost and Soil Stability

The proposed 300 km winter trail crosses continuous permafrost (90-100%) and relies on winter (Feb-Apr) timing with snow packing and ramps to protect the ground. However, there is no commitment to frost-depth checks, early-season inspections, or halt thresholds if softening occurs. This is important because wind-scoured ridges and short warm spells can leave thin snow cover that fails to insulate ice-rich soils, increasing rutting and thaw risk beyond the assumptions. CIRNAC recommends the Proponent consider:

- Establishing minimum snow/ice thickness and early-season inspection protocols for high-risk segments;
- Conducting periodic frost-depth or ground-condition checks and defining halt thresholds; and,
- Defining clear thresholds for suspending operations if softening or rutting is observed.

CIRNAC #3: Terrain and Vegetation Disturbance

The Proponent proposes to confine traffic to a single corridor, pack snow, and build ramps to avoid bare ground, consistent with the historical ≥ 10 cm packed-snow standard; however, the submissions do not include post-thaw verification or restoration, and they do not map sensitive landforms (e.g., wetlands, patterned ground), so micro-rutting and snow compaction effects on micro-topography and drainage may persist undetected, contradicting the “negligible residual effects” assertion. CIRNAC recommends the Proponent consider:

- Conducting a post-melt inspection of the corridor (photographic/drone transects) to document residual disturbance;
- Preparing a rehabilitation framework (e.g., local re-levelling, brush placement where practical) in case impacts are identified; and,
- Mapping sensitive habitats/landforms and recording camp siting criteria (e.g., preference for frozen water surfaces or pre-disturbed pads) to minimize disturbance.

CIRNAC #4: Waste Management and Wildlife Attractants

The project will remove about 661 drums, 49 fuel tanks, and hazardous sediments using tank-container halves and megabags, with interim storage at Baker Lake before sealift. While quantities and packaging types are listed, the plan does not explain how loads will be secured, tracked, or managed at the staging site. Similarly, the application states that food waste and greywater will be returned to Baker Lake but does not describe interim handling. Without clear procedures, there is a risk of leaks, environmental exposure, or wildlife attraction during storage and transport. CIRNAC recommends the Proponent consider:

- Confirming segregation of hazardous and non-hazardous waste and shipment to approved facilities;
- Using wildlife-proof containers for food waste and freezing/containerizing greywater for backhaul; and,



- Incorporating regular inspections of waste storage areas into operational checklists, with corrective actions documented.

Any matter of importance to the Party related to the project proposal

CIRNAC #5: Consultation with interested parties

CIRNAC recommends that the Proponent continue its efforts to engage with potentially interested parties regarding its project proposal. These parties include the community Baker Lake, the Baker Lake Hunters and Trappers Organization, the Ghotelnene K'odtjneh Dene, and any other relevant organizations or individuals.

As part of these consultation activities, several issues should be considered, including but not limited to:

- Incorporation of Inuit Qauijimajatuqangit, Indigenous knowledge, and Community Knowledge, in addition to scientific ways of knowing into project activities;
- Training and employment opportunities for Inuit and community members;
- Procurement opportunities for local and Inuit-owned businesses; and
- Regular updates on the status of project activities.

CIRNAC #6: Project Materials for Ghotelnene K'odtjneh Dene

The Ghotelnene K'odtjneh Dene are Indigenous peoples who have traditionally used and occupied their ancestral lands, including areas within what is now the territory of Nunavut, since time immemorial. They continue to maintain a presence and connection to these lands today. Based on the information available, the proposed project appears to be of possible interest to the Ghotelnene K'odtjneh Dene.

CIRNAC recommends that, if not already undertaken, the Proponent ensure that they consult with the Ghotelnene K'odtjneh Dene.

CIRNAC appreciates the opportunity to provide comments. Should you have any questions, please contact Muhammad Arslan by e-mail at muhammad.arslan@rcaanc-cirnac.gc.ca or David Abernethy by email at david.abernethy@rcaanc-cirnac.gc.ca.

Sincerely,



Richard Bingley
Manager, Impact Assessment

