



NIRB File No.: 25RN070
NPC File No.: 150897

October 30, 2025

Savigata Tootoo
Peter's Expediting Ltd.
P.O Box 74
Baker Lake, NU
X0C 0A0

Sent via email: ftootoo@ssimicro.com

Re: Opportunity to address comments received regarding Peter's Expediting Ltd.'s "Pelly Lake Overland Haul" project proposal

Dear Savigata Tootoo:

On August 15, 2025, the Nunavut Impact Review Board (NIRB or Board) received a referral to screen Peter's Expediting Ltd.'s "Pelly Lake Overland Haul" project proposal from the Nunavut Planning Commission (NPC or Commission). On September 25, 2025, the NIRB circulated a public notice of the screening for this project, inviting interested parties to provide comments directly to the NIRB by October 16, 2025.

On or before October 16, 2025, the NIRB received comments from the following interested parties:

- *Government of Nunavut (GN)*
- *Crown – Indigenous Relations and Northern Affairs Canada (CIRNAC)*
- *Transport Canada (TC)*

All comment submissions received by the NIRB relating to this project proposal can be accessed from the NIRB's online public registry at www.nirb.ca/project/126228.

A *summary* of the public concerns reflected in the comment submissions relate to the following:

Government of Nunavut (GN)

- Recommends 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 planned activities.
- Specific details on avoidance and mitigation measures to be implemented to prevent or minimize impacts on the terrestrial environment.
- Recommends that the Proponent undertake the following:
 - Develop and implement a specific and comprehensive wildlife mitigation and monitoring plan that contains measures 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 30km/hr) if terrestrial wildlife is observed near the trail (e.g., within 500m to 1km)
 - Pausing vehicle use on the trail during periods of low visibility.
 - Route the trail to avoid areas of dense lichen growth.
- Recommend that the Proponent undertake the following:
 - Develop and implement a specific and comprehensive Spill Response Plan that contains measures 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.
 - Adaption of the Spill Response Plan to reflect potential delays in accessing the site by profession responders in the event of a spill.
 - Information about spill response training completed by staff and/or contractors prior to beginning operations.

Crown – Indigenous Relations and Northern Affairs Canada

- Recommends that the Proponent consider:
 - Explaining how the 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.
- Recommends that 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.
- Recommends that 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.
- Recommends that the Proponent consider:
 - Confirming segregations of hazardous and non-hazardous waste and shipment to approved facilities;
 - Using wildlife-proof containers for food waste and freezing/containerized greywater for backhaul; and,
 - Incorporating regular inspections of waste storage areas into operational checklists, with corrective actions documented.
- Recommends that the Proponent continue its efforts to engage with potentially interested parties regarding its project proposal. These parties include the community of Baker Lake, the Baker Lake Hunters and Trappers Organization, the Ghotelnene K’odtjneh Dene, and any other relevant organizations or individuals.
- Recommends that, if not already undertaken, the Proponent ensure that they consult with the Ghotelnene K’odtjneh Dene.

Transport Canada (TC)

- The transportation of dangerous goods (TDG) via any mode, including CAT train, is regulated by the TDG Act and Regulations throughout Canada.
- Notes that the transportation of the fuel storage tanks will require an Equivalency Certificate (permit) from Transport Canada unless the fuel storage tanks are permitted for the transportation of dangerous goods.
- The transportation of contaminated sediments if classified as dangerous goods must be packaged as required by the TDG Regulations and the applicable safety standard. The proponent must ensure that each means of containment must not exceed the maximum quantity limit established by the manufacturer for the means of containment. (**Reference Subsection 5.1.1 and Section 5.6 TDG Regulations.**)
- Please note that the TDG Regulations training is required for the domestic shipment of dangerous goods from Baker Lake to Quebec.

The NIRB would like to provide Peter’s Expediting Ltd. with an opportunity to address the comments noted above prior to the Board rendering its determination for this screening assessment and issuing its subsequent Screening Decision Report to the responsible Minister(s). The NIRB respectfully requests that a response be provided directly to the NIRB by **November 13, 2025**.

If Peter’s Expediting Ltd. determines that the time required to supply a written response is significantly greater than two (2) weeks, the Board requests written notification and an anticipated date for submission be provided as soon as possible.

Please send any forthcoming submissions directly to the NIRB at info@nirb.ca, or through the online public registry at www.nirb.ca.

If you have any questions or require additional clarification, please contact the undersigned directly at (867) 983-4622 or mbeattie@nirb.ca.

Sincerely,



Mia Beattie
Impact Assessment Officer
Nunavut Impact Review Board

cc: Distribution List
Richard Dwyer, Nunavut Water Board
Nidhi Singh, Nunavut Water Board
Abid Jan, Nunavut Water Board
Luis Manzo, Kivalliq Inuit Association
Ashley Aupaluktuk-Burton, Kivalliq Inuit Association
Brenda Pilakapsi, Kivalliq Inuit Association
Caroline Whittle, Government of Nunavut, Department of Culture and Heritage
Adam Pollock, Government of Nunavut, Department of Culture and Heritage
Tracey McCaie, Crown – Indigenous Relations and Northern Affairs Canada
Marcus Bermann, Crown – Indigenous Relations and Northern Affairs Canada