



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 professional 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,



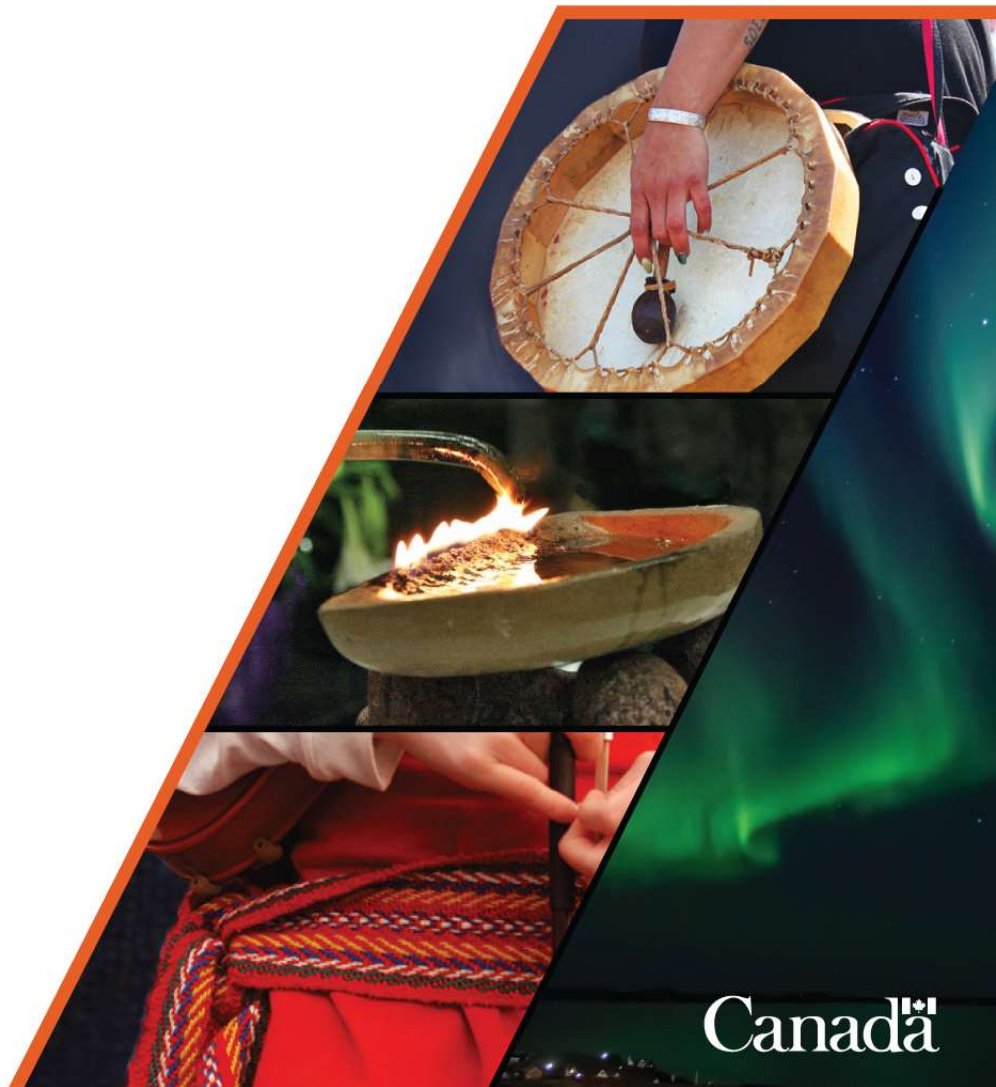
Mia Beattie
Impact Assessment Officer
Nunavut Impact Review Board

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



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



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

October 16, 2025

NIRB File #: 25RN070

Sent VIA Email: info@nirb.ca

Re: Notice of Screening for Peter's Expediting Ltd's "Pelly Lake Overland Haul" project proposal

Hello Mia,

The Government of Nunavut (GN) thanks the Nunavut Impact Review Board (NIRB) for the opportunity to review Peter's Expediting Ltd.'s "Pelly Lake Overland Haul" project proposal, NIRB File #: 25RN070.

The GN has reviewed the proposed project and related documents and has three comments to raise with the Board at this time. These comments (attached) reflect the lack of information in the project proposal relating to the following: work the proponent has done regarding trail route selection; information about mitigation of potential impacts to wildlife and wildlife habitat; and information about transferring and transporting fuel and other hazardous substances, and spill response procedures and planning.

The GN appreciates participating in the screening of this project through the NIRB review process. Should there be any concerns or need for follow-up, please feel free to contact me at jbuller@gov.nu.ca.

Thank you,

Justin Buller
Interim Avatiliriniq Coordinator
Government of Nunavut

GN-01	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Terrestrial Environment
References	• 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 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.	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
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. The GN understands that an aerial scouting trip was planned for July 2025, with the intention to, “...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) 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.	

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	• 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

- 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.



COMMENT FORM FOR NIRB SCREENINGS

The Nunavut Impact Review Board (NIRB) has a mandate to protect the integrity of the ecosystem for the existing and future residents of Nunavut. To assess the environmental and socio-economic impacts of the project proposal, NIRB would like to hear your concerns, comments and suggestions about the following project proposal application:

Project Proposal Title: <u>Pelly Lake Overland Haul</u>	
Proponent: <u>Peter's Expediting Ltd.</u>	
Location: <u>Kivalliq Region</u>	
Comments Due By: <u>October 16, 2025</u>	NIRB #: <u>25RN070</u>

Indicate your concerns about the project proposal below:

☐ no concerns	☐ traditional uses of land
☐ water quality	☐ Inuit harvesting activities
☐ terrain	☐ community involvement and consultation
☐ air quality	☐ local development in the area
☐ wildlife and their habitat	☐ tourism in the area
☐ marine mammals and their habitat	☐ human health issues
☐ birds and their habitat	☒ other: Regulatory compliance
☐ fish and their habitat	
☐ heritage resources in area	

Please describe the concerns indicated above:

Transport Canada does not have concerns about the proposed project but notes the Project is subject to the *Transportation of Dangerous Goods Act* and *Transportation of Dangerous Goods Regulations*. For the information of the Board, the Proponent, and reviewers of the Project, relevant information about this act and regulation is provided below.

Transportation of Dangerous Goods (TDG)
 The transportation of dangerous goods (TDG) via any mode, including CAT train, is regulated by the TDG Act and Regulations throughout Canada.

The proposed scope of work includes the overland hauling of waste and debris which includes dangerous goods.

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. A UN standardized means of containment is allowed for the transportation of dangerous goods if it meets the requirements of the applicable safety standard in the TDG Regulations. **(Reference Subsection 5.1.1 and Section 5.6 TDG Regulations.)** (See: <https://tc.canada.ca/en/dangerous-goods/application-equivalency-temporary-certificate> and <https://tc.canada.ca/en/dangerous-goods/how-apply-equivalency-certificate-permit-equivalent-level-safety>.)

The transportation of the 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.**)

The requirements for the domestic marine transportation of dangerous goods (e.g., from Baker Lake) are set out in Part 11 of the Transportation of Dangerous Goods Regulations. Please note that Transportation of Dangerous Goods Regulations training is required for the domestic shipment of dangerous goods from Baker Lake to Quebec. Training under the International Marine Dangerous Goods Code is not required for domestic marine transportation of dangerous goods.

Do you have any suggestions or recommendations for this application?

No.

Do you support the project proposal? Yes ☐ No ☐ Any additional comments?

Transport Canada takes no position on whether NIRB should approve this project.

Name of person commenting: Scott Kidd **of** Winnipeg

Position: Reginal Env. Advisor **Organization:** Transport Canada

Signature: Scott Kidd (by email) **Date:** October 16, 2025



We know the North. We know logistics. We come with the territory.

PO Box 13, Baker Lake, Nunavut X0C 0A0

Tel. 867-793-2703

Fax. 867-793-2988

November 3, 2025

Richard Bingley
Manager, Impact Assessment
918 Sivumugiaq Street
Iqaluit, NU X0A 3H0

Dear Mr Bingley,

This letter is in response to the October 16, 2025 comments with respect to the **Notice of Screening for Peter's Expediting Ltd's "Pelly Lake Overland Haul" project proposal (25RN070)** provided to Mia Beattie, Impact Assessment Officer, Nunavut Impact Review Board (NIRB). Thank you for your time and care in responding to our proposal.

Concern #1: Fuel and Hazardous Material Handling

Per-train fuel limits – due to the distance of this project, 20,000L

Where spill kits are located – each machine and Caboose

How refueling will take place enroute – **refueling only be performed on land**

Steps for refuelling:

- Equipment positioned near burn fuel containment tank
- Drip trays placed in refuel area with absorbent matting to catch any spillage

Equipment Used for refuelling:

- 12V diesel pumps, Matting collected in large spill kits to be stored until return to community, disposed of at community waste facility

Containment measures for mid-way fuel stash – Self contained seacan tank at Aberdeen Lake

Steps for spill clean up on ice and snow – Snow: Shovel contaminated snow into spill kits, use absorbent matting to soak up spill, place contaminated matting into spill kit, tightly seal, store in outdoor deck area of Caboose, return to community waste facility. Ice: Scrape ice with shovel, use absorbent matting to soak up spill, place contaminated matting into spill kit, tightly seal, store in outdoor deck area of Caboose, return to community waste facility.

Please refer to revised Spill Response Policy

Concern #2: Permafrost and Soil Stability

In response to the Permafrost and Soil Stability concern, PEL has operated and will continue to operate by following our overland haul operating standards. Our equipment and sleighs require a



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PO Box 13, Baker Lake, Nunavut X0C 0A0 Tel. 867-793-2703 Fax. 867-793-2988

minimum of 48 inches of snow, and 18 inches of ice to begin operations. Should levels drop below, operations will pause until either conditions approve or postpone to next cold season. Our overland haul staff have gained experience each year, and are also experienced hunters who are knowledgeable of the terrain. In following Inuit Qaujimajatuqangit Principles, we rely on their traditional expertise to determine halt thresholds. PEL also utilizes an Ice Profiler, that determines ice thickness. (Profiler details listed on NIRB application equipment list).

Concern #3: Terrain and Vegetation Disturbance

PEL is highly experienced in the development of winter trails and aware of this concern. Prior to official overland haul season commencement, trail conditions are inspected during the pre-season trail scouting trip by snowmobile. This trip determines thickness and stability of snow and ice to avoid damage caused by equipment to flora/fauna. If the ground conditions are not acceptable, the trip will be postponed. Ideal ice thickness is at least 4 feet (48 inches) and ideal snow thickness is 1.5 feet (18 inches). Our equipment will not operate on thawed and exposed terrain or vegetation. All necessary measures will be taken to avoid disruption to vegetation. Historically, operations have halted due to insufficient snow cover.

Concern #4: Waste Management and Wildlife Attractions

In response to the Waste Management and Wildlife Attractions concern, PEL will continue to operate as we have been. All food is stored inside the Caboose (living quarters), all food waste is stored in an open-top drum with a lid and returned to community waste facility. All human waste/greywater is stored in Double Doodie bags, stored in an open-top drum with a lid, and returned to community waste facility.

The 661 drums have been crushed and stored in tank-container halves. The tank container halves and megabags will be secured on PEL sleighs using chains, Herc-straps and load binders. Once these supplies arrive at Baker Lake, they will be stored at Peter's Expediting Ltd. industrial lot and blocked off from the public with barriers. We will perform weekly inspections until supplies are loaded onto sealift. *Please see attached Contaminated Goods Storage Inspection Form.*

Please refer to attached Wildlife/Land Management Policy

In summary, Peter's Expediting Ltd. has been doing overland haul work since inception in 1998. The regional community has full knowledge of our 27-year experience in this type of operation. No direct consultation was completed in 2025, other than keeping KIA staff informed and interviewing local Baker Lake Elder John Avaala on the local wildlife, history and terrain navigation needs of the area being travelled on. PEL wishes to expedite this process to demonstrate to our clients that we can complete this project on schedule.



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PO Box 13, Baker Lake, Nunavut X0C 0A0 Tel. 867-793-2703 Fax. 867-793-2988

Please feel free to contact me with further questions – frank@petersexpediting.com and phone 867-793-2703.

Ma'na,

Savigata Tootoo

General Manager

Peter's Expediting Ltd.

Baker Lake, NU



We know the North. We know logistics. We come with the territory.

PO Box 13, Baker Lake, Nunavut X0C 0A0

Tel. 867-793-2703

Fax. 867-793-2988

November 3, 2025

Mr. Justin Buller
Interim Avatiliriniq Coordinator
Government of Nunavut
P.O. Box 1000, Stn. 1500
Iqaluit, Nunavut X0A 0H0

Dear Mr Buller,

This letter is in response to the October 16, 2025 comments with respect to the **Notice of Screening for Peter's Expediting Ltd. "Pelly Lake Overland Haul" project proposal (25RN070)** provided to Mia Beattie, Impact Assessment Officer, Nunavut Impact Review Board (NIRB). Thank you for your time and care in responding to our proposal.

Concern: Terrestrial Environment

The chosen Trail Routing was established based on traditional Inuit knowledge after consultations with local elder John Avaala. PEL is aware of the impacts of overland transport on habitat and will as much as possible confine its trails to frozen waterways as shown on the uploaded to NIRB route map. PEL is highly experienced in the development of winter trails and aware of this concern. Prior to official overland haul season commencement, trail conditions are inspected during the pre-season trail scouting trip by snowmobile. This trip determines thickness and stability of snow and ice to avoid damage caused by equipment to flora/fauna. If the ground conditions are not acceptable, the trip will be postponed. Ideal ice thickness is at least 4 feet and ideal snow thickness is 1.5 feet.

No results from the July 2025 aerial scouting trip. This trip did not happen. PEL will do a snowmobile ground scouting trip in February 2026.

Many characteristic Arctic tundra mammal and bird species including barren-ground caribou, muskox, grizzly bear, Arctic fox, Arctic wolf, wolverine, ermine, Arctic hare, Arctic ground squirrel, brown lemming, gyrfalcon, snow geese, Canada goose, willow ptarmigan and rock ptarmigan, are likely to inhabit the Site and surrounding area.

The Pelly Lake Site is within the Southern Arctic Ecozone and the Garry Lake Lowland Ecoregion, which can be characterized as a gently sloping plain with a low Arctic ecoclimate and shrub tundra **vegetation**. The Project Site and surrounding area are characterized as a mosaic of



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sand and gravel glacial deposits with thinly dispersed vegetation that is primarily composed of sedges, dwarf shrubs, herbaceous plant species, lichens, and mosses. There are multiple lakes and ponds present at the Site and surrounding area that are bordered by sedges and dwarf shrubs but do not appear to support aquatic or emergent vegetation (inferred from field observation).

The Project Site provides minimal habitat for soil **invertebrate** communities, due to the presence of permafrost that limits soil structure and depth. Soil invertebrates include organisms such as worms, springtails, spiders, and insects. As a result, soil invertebrates are uncommon in terrestrial Arctic ecosystems (Danks et al., 1997).

Please refer to attached transcription of interview with local Elder John Avaala

Concern: Wildlife Management Plan

In response to the Wildlife Management Plan concern, PEL will ensure the following:

- Yield right of way to wildlife along trail
- Reducing speed – CAT train travels at approximately 8m/h
- Pausing vehicle use on the trail during periods of low visibility
- Route the trail to avoid dense lichen area, important food source for caribou. If ground is visible, it will not be travelled on.

Please refer to attached Wildlife/Land Management Policy

Concern: Spill Prevention and Contingency Plan

Per-train fuel limits – due to the distance of this project, 20,000L

Where spill kits are located – each machine and Caboose

How refueling will take place enroute – **refueling only be performed on land**

Steps for refuelling:

- Equipment positioned near burn fuel containment tank
- Drip trays placed in refuel area with absorbent matting to catch any spillage

Equipment Used for refuelling:

- 12V diesel pumps, Matting collected in large spill kits to be stored until return to community, disposed of at community waste facility

Containment measures for mid-way fuel stash – Self contained seacan tank at Aberdeen Lake

Steps for spill clean up on ice and snow – Snow: Shovel contaminated snow into spill kits, use absorbent matting to soak up spill, place contaminated matting into spill kit, tightly seal, store in outdoor deck area of Caboose, return to community waste facility. Ice: Scrape ice with shovel, use absorbent matting to soak up spill, place contaminated matting into spill kit, tightly seal, store in outdoor deck area of Caboose, return to community waste facility.



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The Pelly Lake Overland Haul project is in partnership with Salumaq Environmental Contracting Ltd, who is a soil/water remediation firm. They completed the remediation of the Pelly Lake site in summer 2025, these are the goods that PEL is hauling out of Pelly Lake in winter 2026. Should a major spill occur, PEL will work closely with Salumaq to complete all necessary procedures in spill clean up and remediation.

Please refer to revised Spill Response Policy

In summary, Peter's Expediting Ltd. has been doing overland haul work since inception in 1998. The regional community has full knowledge of our 27-year experience in this type of operation. No direct consultation was completed in 2025, other than keeping KIA staff informed and interviewing local Baker Lake Elder John Avaala on the local wildlife, history and terrain navigation needs of the area being travelled on. PEL wishes to expedite this process to demonstrate to our clients that we can complete this project on schedule.

Please feel free to contact me with further questions – frank@petersexpediting.com and phone 867-793-2703.

Ma'na,

Savigata Tootoo

General Manager

Peter's Expediting Ltd.

Baker Lake, NU



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November 3, 2025

Scott Kidd
Regional Environmental Advisor
Transport Canada
Winnipeg, MB

Dear Mr Kidd,

This letter is in response to the October 16, 2025 comments with respect to the **Notice of Screening for Peter's Expediting Ltd's "Pelly Lake Overland Haul" project proposal (25RN070)** provided to Mia Beattie, Impact Assessment Officer, Nunavut Impact Review Board (NIRB). Thank you for your time and care in responding to our proposal.

Concern #1: Fuel Storage Tanks Certificate

Peter's Expediting Ltd. is in the process of applying for a Equivalency Certificate. We have been in contact with Transport Canada to ensure proper steps are taken during the application process.

Concern #2: Transportation of Dangerous Goods Regulations Training

Peter's Expediting Ltd. has made arrangements, as we have in previous years, for our overland haul staff to complete TDG Training provided by Danatec.

In summary, Peter's Expediting Ltd. has been doing overland haul work since inception in 1998. The regional community has full knowledge of our 27-year experience in this type of operation. No direct consultation was completed in 2025, other than keeping KIA staff informed and interviewing local Baker Lake Elder John Avaala on the local wildlife, history and terrain navigation needs of the area being travelled on. PEL wishes to expedite this process to demonstrate to our clients that we can complete this project on schedule.

Please feel free to contact me with further questions – frank@petersexpediting.com and phone 867-793-2703.

Ma'na,

Savigata Tootoo - General Manager - Peter's Expediting Ltd. - Baker Lake, NU