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January 13, 2026

NIRB File #: 25RN083

Sent VIA Email: info@nirb.ca

Re: Notice of Screening for Peter's Expediting Ltd.'s "Aberdeen Lake-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 "Aberdeen Lake-Pelly Lake Overland Haul" project proposal, NIRB File #: 25RN083.

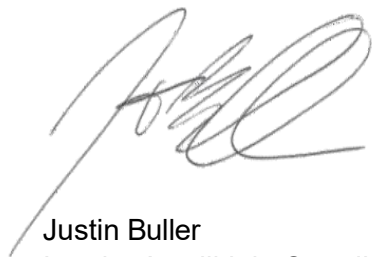
The GN has reviewed the proposed project and related documents and has three concerns to raise with the Board at this time. The GN seeks the inclusion of commitments the proponent has made relative to specific wildlife mitigation approaches into its Wildlife/Land Management Policy, as well as the development of a standalone spill response plan to support safe operations and transportation of fuel.

The GN also has concerns about the lack of an assessment of archaeological resources along the proposed route, an incomplete recognition of the risk from project activities, and the absence of appropriate measures to mitigate impacts to these resources.

As proposed, the GN is not confident that the project can be undertaken without violating the *Nunavut Archaeological and Palaeontological Sites Regulations*. The GN has developed recommendations for the Board to consider with respect to the project proposal and has outlined two options for the proponent to mitigate the risks and avoid compliance issues. The GN's concerns and recommendations are further detailed and appended to this letter.

The GN appreciates participating in the screening of this project through the NIRB review process and takes this opportunity to thank the Board for accommodating the GN's extension request. 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- Wildlife Management Plan	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Wildlife Management Plan: Follow-up
References	• Government of Nunavut. Comments on NIRB Application for Screening #126228 Pelly Lake Overland Haul (October 2025) • Peter's Expediting Ltd. Comments and Response to Comments Letter (November 2025) • Peter's Expediting Ltd. Wildlife/Land Management Policy for Overland Hauling (November 2025) • Salumaq Environmental Contracting Ltd. Draft Winter Trail Plan. (November 2025)
IDENTIFICATION OF ISSUE	
In October 2025, the Government of Nunavut (GN) submitted comments on the 'Pelly Lake Overland Haul' Project (25RN070), originally proposed by Peter's Expediting Ltd. (the Proponent). Following this, the Proponent requested the termination of 25RN070 and submitted a nearly identical Proposal (25RN070). The GN notes that the Proponent's 25RN070 submission materials incorporate many of the GN's previous comments. In these earlier comments, the GN had requested the Proponent to submit a Wildlife Mitigation and Monitoring Plan (see GN-02 Wildlife Management Plan; GN, October 2025). The Proponent has submitted a Wildlife/Land Management Policy (WLMP; November 2025) for 25RN070. However, the GN has noted some minor issues with the level of detail in the WLMP document.	
SUPPORTING RATIONALE	
The Proponent's Comments and Response to Comments Letter directed to the GN (Peter's Expediting Ltd., November 2025) states the following: "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" (Page 20).	

Similar information can be found in the Proponent's Draft Winter Trail Plan:

"...if groups of animals are sighted, the CAT trains will

- reduce speed to approx 10km/h
- avoid unnecessary noise.
- yield right of way to animals that happen to be crossing the trail
- pause travel in low visibility" (Pages 16–17)

However, the GN notes that the WLMP does not explicitly list two management measures articulated in the above cited documents. These include a) yielding to wildlife along or crossing the trail and b) pausing vehicle use during periods of low visibility as management measures.

The GN underscores the importance of ensuring that operational documents, such as the WLMP, contain all relevant mitigation and management measures the Proponent is committing to undertaking. This will help ensure the WLMP can guide staff effectively in implementing appropriate mitigation and monitoring measures for the Project. Consistency, clarity and adequate detail are necessary within the WLMP for transparency and to prevent adverse impacts to wildlife resulting from project activities.

REQUEST(S)/RECOMMENDATION(S)

The GN requests that the Proponent:

- Integrate the relevant wildlife mitigation and management measures, outlined in the Proponent's Comments and Response to Comments Letter and the Draft Winter Trail Plan, into the WLMP.

GN: 02 – Spill Prevention

Department	Environment
Organization	Government of Nunavut
Subject/Topic	Spill Prevention and Spill Contingency Planning: Follow-up
References	• Government of Nunavut. Comments on NIRB Application for Screening #126228 Pelly Lake Overland Haul (October 2025) • Peter's Expediting Ltd. Comments and Response to Comments Letter (November 2025)

	• Salumaq Environmental Contracting Ltd. Draft Winter Trail Plan. (November 2025) • Peter's Expediting Ltd. Spill Response Policy (October 2025)
IDENTIFICATION OF ISSUE	
As stated above, the GN notes that the Proponent's 25RN070 submission materials incorporate many of the GN's previous comments. Previously, the GN had requested that the Proponent develop and implement a specific and comprehensive Spill Response Plan and ensure that these plans are provided in every project vehicle (see GN-03 Spill Prevention and Spill Contingency Planning; GN, October 2025). However, the GN notes that it is unclear if the Proponent has undertaken these recommendations.	
SUPPORTING RATIONALE	
The GN notes that the Proponent has provided additional information in their Winter Trail Plan (e.g., section 3 Risks and Mitigation Measures; Salumaq, November 2025) concerning spill prevention and response. However, this information does not appear to be reflected in the Project's Spill Response Policy or in a standalone Spill Response Plan (for daily operational use). Per section 3.2 of the Draft Winter Trail Plan, the GN recognizes that the Proponent intends to train personnel in spill prevention and response through a combination of activities like related document review, mock spill drills and safety meetings (Page 14). However, the GN sees value in having specific, clear, and detailed operational documents (e.g., spill response plans). Furthermore, the GN believes that Project staff should have access to these documents in all relevant project vehicles to ensure that critical information and procedures are readily available in the event of a spill.	
REQUEST(S)/RECOMMENDATION(S)	
The GN recommends that the Proponent undertake the following: - Develop and implement a specific and comprehensive Spill Response Plan - Include this Spill Response Plan in every vehicle, complete with current contact information for the appropriate spill response contact. - Provide the Spill Prevention and Response Program referenced in the Draft Winter Trail Plan.	

GN: 03 - Archaeology	
Department	Culture and Heritage
Organization	Government of Nunavut
Subject/Topic	Aberdeen Lake-Pelly Lake Overland Haul
References	NIRB126252/25RN083: Notice of Screening and Comment Request for PEL's "Aberdeen Lake-Pelly Lake Overland Haul" Project Proposal
CONCERNS	
The Proponent proposes a 300-km winter trail/Cat-train route to haul waste from Pelly Lake to Baker Lake for proper disposal and deliver fuel and supplies to Aberdeen Lake. While the proposed project is designed to minimize impacts to the environment, documents submitted as part of the application suggest that serious risks of impact to heritage resources remain unaddressed. CH has identified the following specific concerns: Lack of Assessment: The proposed route, including Leg 1 (described as an existing trail), does not appear to have been subjected to a systematic archaeological assessment by a qualified individual holding a Nunavut Archaeologist Permit issued by CH. A search of the Nunavut Archaeological Site Database indicates numerous previously recorded sites in the general vicinity, suggesting a high likelihood of unrecorded sites along the proposed route. The Proponent has acknowledged the need to avoid archaeological sites and graves in documents submitted as part of the NIRB application (see "Interview with Elder"). A previous, related NIRB Application submitted by the proponent (NIRB 25RN070) further acknowledged the potential for impacts to heritage sites where it indicated that pre-season scouting trips had been planned along the proposed trail alignment to identify heritage resources, with both an aerial scouting trip planned for July 2025 and additional reconnaissance by snowmobile. It is our understanding that neither has yet been undertaken (see "Draft Winter Trail Plan"). Furthermore, the Proponent does not appear to have contacted CH regarding an archaeological permit for these activities. The proponent has recently clarified that they plan a snowmobile ground scouting trip in February 2026. (see "Comments and Response to Comments"), though CH would not permit archaeological survey in winter (snow on ground) conditions. Without a systematic survey undertaken by a qualified individual in non-snow conditions, the Proponent cannot ensure heritage sites are avoided, especially when any cultural features present along the route would be covered in snow. CH is concerned the proponent would not be able to avoid driving over and potentially impacting (e.g. crushing, displacing, damaging) archaeological sites and graves. While the Proponent has indicated they will rely on engagement with local Elders to guide route selection, CH notes that Traditional Knowledge and archaeological survey are complementary but distinct sources of information and that heritage sites not contained in local oral histories may be present and would remain vulnerable to inadvertent disturbance.	

- **High-Potential Landforms:** The Winter Trail Plan notes that the trail "...may preferentially follow on or near eskers because they are well drained and stable..." These landforms, along with ridges and knolls, have a high potential for sensitive cultural sites (e.g., burials, caches, hunting blinds, inuksuit, tent rings). Elevated features are often wind-scoured and may hold minimal snow cover, increasing the risk of impact from heavy equipment. Other landforms that would be traversed with a high potential for the presence of cultural features include shorelines and riverbanks.
- **Operational Discrepancies (Snow Depth):** The Winter Trail Plan cites a requirement for 4 feet of snow, yet other application documents (see "Comments and Response to Comments") suggest an operational ideal of only 1.5 feet. CH considers 1.5 feet of snow insufficient to protect cultural features from damage by heavy equipment on terrestrial terrain. Furthermore, Section 2.1.2 of the Winter Trail Plan states that the tractor plough "will push aside the snow and provide a level surface." Pushing snow aside rather than compacting it on terrestrial routes reduces the protective layer over the ground surface, increasing the risk of disturbing heritage resources concealed beneath the snow.

RECOMMENDATIONS

CH recommends that the NIRB approve the project only if subject to the following strict operational conditions. The Proponent must select one of the following two compliance pathways:

Option 1: Strict Avoidance (Proceed Winter 2026)

If the Proponent wishes to proceed according to the current schedule, they must mitigate the risk of inadvertent impact to heritage resources by adhering to the following restrictions:

- **Route Restrictions:** The route must be strictly confined to frozen waterbodies (lakes/ivers) and low-lying seasonally wet areas/wetlands.
- **Prohibited Terrain:** Travel on eskers, ridges, knolls, and other elevated terrestrial landforms is strictly prohibited.
- **Snow Depth:** A minimum of 4 feet (48 inches) of packed snow must be maintained between the vehicle tracks/sleds and the ground surface at all times during operations on any terrestrial crossovers.
- **No Ground Disturbance:** Cutting, shaving, notching, or filling of the ground is strictly prohibited. Modification of the route surface must be restricted to the manipulation of snow only. If a slope (bank or hillside) cannot be traversed without cutting into the terrestrial substrate, that route option must be abandoned.
- **Verification:** The Proponent must record the precise GPS track of the equipment during operations. These logs must be provided to the Government of Nunavut (Department of Culture and Heritage) and the NIRB within 30 days of project completion to verify that high-potential landforms were avoided.

Option 2: Assessment and Mitigation (Delayed Start)

If the Proponent determines that operations require the use of eskers/ridges for stability, or if the 4-foot snow requirement cannot be met on terrestrial routes:

- The Proponent must postpone the specific route segments involving these landforms.
- The Proponent must hire a qualified individual (archaeologist able to hold a Class 2 Nunavut Archaeologist Permit) to complete an archaeological assessment of the route

(or route options) and conduct a systematic survey during snow free conditions (Summer 2026) of any areas of archaeological potential that require traversing to identify sites and assist in the development of appropriate routing and any required avoidance/mitigation strategies.

Standard Conditions (Applies to both Options)

The Proponent must adhere to the following conditions to ensure compliance with the *Nunavut Archaeological and Palaeontological Sites Regulations*:

- No activities are to be conducted in the vicinity (50 m buffer zone) of any known or suspected heritage sites (archaeological or palaeontological). If heritage sites or features are encountered during the project, activities within the buffer must cease immediately. Each site encountered needs to be recorded (coordinates, description, and photographs) and reported to the Department of Culture and Heritage.
- All heritage sites (archaeological and palaeontological) in Nunavut are protected by law. The Proponent must understand that it is their responsibility to ensure that no heritage sites are disturbed in the course of their activities. No person shall alter, or otherwise disturb an archaeological site, or remove any artifact from an archaeological site. Leaving waste or debris (littering) near heritage sites is not permitted, nor is defacing or writing on rocks and infrastructure (graffiti). The Proponent shall ensure that all staff and contractors are aware of the Proponent's responsibilities and requirements. Moreover, the building of inuksuit is not recommended.

Rationale

The *Nunavut Archaeological and Palaeontological Sites Regulations* prohibit the alteration or disturbance of heritage sites without a CH-issued permit. The proposed use of eskers without a prior survey presents an unacceptable risk of violating these regulations. Option 1 allows the project to proceed by restricting travel to areas where the risk of interaction with heritage sites is negligible (water/wetlands). Option 2 ensures regulatory compliance through standard assessment procedures if high-risk terrain is required.

ADDITIONAL COMMENTS

Under the *Nunavut Act*, the *Nunavut Archaeological and Palaeontological Sites Regulations* ensure the protection, care, and preservation of archaeological and palaeontological sites. The Department of Culture and Heritage (GN-CH) serves as the Designated Agency responsible for the administration of the permitting system, in close coordination with our land claim partners, specifically the Inuit Heritage Trust (IHT), which serves as the Designated Organization under Article 33 of the *Nunavut Agreement*. All archaeological and palaeontological sites in Nunavut are protected by law. It is illegal to search for, survey, excavate, alter, or otherwise disturb any archaeological or palaeontological site without a valid permit issued by the Government of Nunavut.

GN-CH notes the example of a similar project (NIRB File No: 16AN060) that was previously screened through NIRB, where CH identified similar concerns and the Board adopted a recommendation in the associated Screening Decision Report that read (in part): "Pursuant to the recommendation of the Government of Nunavut, the Proponent shall conduct an archaeological survey during a non-snow period prior to the commencement of activities to identify any potential archaeological and historical resources along the proposed overland route in order to prevent or minimize potential project-related effects on known heritage areas."