



# CIRNAC Comments to NIRB

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



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

Your file - Votre référence  
25RN083  
Our file - Notre référence  
GCdocs# 142665047

January 14, 2026

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 Peter's Expediting Ltd.'s "Aberdeen Lake-Pelly Lake Overland Haul" Project Proposal**

Dear Mia Beattie,

On December 2, 2025, the Nunavut Impact Review Board (NIRB) invited parties to comment on Peter's Expediting Ltd.'s "Aberdeen Lake-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:

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

**CIRNAC #1: Fuel and Hazardous Liquids Handling**

The Project relies on fuel-intensive winter hauling operations using heavy equipment, support vehicles, and a mobile camp unit operating along a remote winter trail that includes frozen lakes, with aircraft support associated with fuel and resupply activities. The use and transport of diesel fuel, aviation fuel (Jet A), lubricants, hydraulic fluids, and ethylene glycol is mentioned. Spills or leaks during storage, transfer, or refuelling in winter conditions may spread rapidly across snow and ice, enter cracks in lake ice, and later mobilize into surface water during thaw. The Proponent includes a Spill Response Policy which describes the use of secondary containment, spill response equipment, and spill reporting procedures; the effectiveness of these measures in over-ice winter operations is dependent on consistent implementation and personnel training.

Given the volumes involved and the frequency of handling, fuel management represents a key environmental risk pathway. CIRNAC recommends that the Proponent considers:

- Conducting refueling and fuel transfer activities with appropriate setbacks from waterbodies, , where practicable;
- Storing fuel and hazardous materials within secondary containment designed to prevent releases to snow, ice, or soil;



- Keeping spill response materials readily available at all locations where fuel is stored or transferred; and,
- Ensuring personnel involved in fuel handling and spill response receive appropriate training and refresher training.

## **CIRNAC #2: Legacy Contamination and Secondary Release Risk**

The Project includes remediation and winter transport of legacy waste materials from the Pelly Lake area, including lead-impacted sediment, petroleum-contaminated soils, tar residues, batteries, and hydrocarbon-related debris. The materials will be transported over an approximately 300 km winter trail, including over-ice travel across multiple lakes, using CAT trains operating over multiple days.

While winter conditions reduce direct ground disturbance, the handling and transport of contaminated materials over long distances introduces a risk of secondary environmental release. Mechanical stress during hauling, load shifting, pallet failure, or tearing of soil bags could result in the dispersal of contaminated material onto snow or ice. Material released on lake ice may migrate laterally and subsequently enter surface water during spring melt, expanding the spatial footprint of contamination beyond the original remediation area. The Proponent identifies spill response and reporting procedures applicable to the handling and transport of contaminated materials; however, given the length of the route, duration of hauling trips, and the quantity of contaminated material involved, CIRNAC recommends that the Proponent considers:

- Ensuring containers used for contaminated materials are sealed, intact, and suitable for transport;
- Securing loads to minimize the potential for shifting, rupture, or loss during transport; and,
- Collecting and removing any released contaminated material and managing it as contaminated waste.

## **CIRNAC #3: Terrain and Permafrost Disturbance Under Variable Snow Conditions**

The Winter Trail Plan indicates that the Project area is underlain by continuous permafrost, and the elder interview (Indigenous knowledge) identifies seasonal variability in snow cover, with limited snow accumulation on exposed sand and hilltop features during parts of the winter. Even at low operating speeds, heavy equipment travel over thin snow cover can result in direct ground contact, rutting, or surface disturbance.

In permafrost terrain, localized disturbance can alter thermal regimes, increase susceptibility to erosion, and delay natural recovery. Portions of the proposed route include segments that are not previously established winter trails, increasing uncertainty regarding snow retention and ground conditions. The Proponent identifies winter trail use and low operating speeds to limit disturbance; nevertheless, effectiveness in areas of thin snow cover and new trail segments is dependent on site-specific conditions.

CIRNAC recommends that the Proponent considers:



- Identifying “thin snow / exposed ground” risk zones and describing how trail alignment or operations could be adjusted when those conditions are encountered; and,
- Describing how areas with elevated ground disturbance potential would be identified and evaluated following operations.

#### **CIRNAC #4: 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 of Baker Lake, the Baker Lake Hunters and Trappers Organization, 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;
- The experience of community members who participate in traditional harvesting activities within or in close proximity to the project area;
- 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 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](mailto:muhammad.arslan@rcaanc-cirnac.gc.ca) or David Abernethy by email at [david.abernethy@rcaanc-cirnac.gc.ca](mailto:david.abernethy@rcaanc-cirnac.gc.ca).

Sincerely,



Richard Bingley  
Manager, Impact Assessment

