



NIRB File No.: 25RN083
NPC File No.: 150934

January 14, 2026

Frank Tootoo
Peter's Expediting Ltd.
P.O Box 13
Baker Lake, NU
X0C 0A0

Sent via email: ftootoo@ssimicro.com

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

Dear Frank Tootoo:

On November 19, 2025, the Nunavut Impact Review Board (NIRB or Board) received a referral to screen Peter's Expediting Ltd.'s "Aberdeen Lake-Pelly Lake Overland Haul" project proposal from the Nunavut Planning Commission (NPC or Commission). On December 2, 2025, the NIRB circulated a public notice of the screening for this project, inviting interested parties to provide comments directly to the NIRB by January 14, 2026.

On or before January 14, 2026, the NIRB received comments from the following interested parties:

- *Kitikmeot Inuit Association (KIA)*
- *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/126252.

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

Kitikmeot Inuit Association

- Would like the Proponent to ensure that the traveling crew remain mindful of local wildlife in the area that is shared between the two regions. Crew should be observant of wildlife and cautious to not cause undue disturbance, or to approach any wildlife.
- KIA encourages adherence to the "leave no trace" principles and recommends that all food, waste, and other potential wildlife attractants be securely stored. KIA would also like to

recommend that with the involvement of waste and fuel, the Proponent ensure proper storage, handling, and containment of all waste and fuel supplies, and to ensure there are preventative measures for accidental fuel spills with the proper spill response materials.

Government of Nunavut

- Raises concerns about the adequacy and consistency of the Proponent's Wildlife/Land Management Policy, noting that key mitigation measures (e.g., yielding to wildlife, pausing travel during low visibility) are mentioned in other documents but not clearly reflected in the operational policy. GN requests these measures be fully integrated for clarity, transparency, and effective implementation
- Requests the development of a clear, standalone, and comprehensive Spill Response Plan. They note that spill-related information appears fragmented across documents and should be consolidated into an operational plan available in all project vehicles, with up-to-date contact information and clear response procedures
- Expresses serious concerns about the lack of archaeological assessment along the proposed route, particularly given the high likelihood of heritage resources in the area. They state that the project, as currently proposed, may not comply with the Nunavut Archaeological and Palaeontological Sites Regulations
- Identifies risks to heritage resources due to the use of high-potential landforms (e.g., eskers, ridges, shorelines), inconsistent snow depth requirements, and trail construction methods that could expose or damage cultural features
- Recommends that the project should only proceed under one of two compliance pathways:
 - Strict avoidance, limiting travel to frozen waterbodies and wetlands, prohibiting use of sensitive landforms, maintaining a minimum snow depth, and tracking GPS routes; or
 - Delayed start, requiring a full archaeological assessment during snow-free conditions if high-risk terrain must be used
- Emphasizes that all heritage sites in Nunavut are legally protected, that a 50 m buffer must be maintained around any known or suspected sites, and that all staff must be trained to recognize and report heritage features

Crown – Indigenous Relations and Northern Affairs Canada

- Recommends that the Proponent:
 - Considers enhanced fuel handling and transport measures, as these activities represent a key environmental risk due to reliance on heavy equipment, winter hauling, and over-ice travel. There is concern that spills could spread rapidly over snow and ice and enter surface waters during thaw. Suggested measures include

setbacks from waterbodies, secondary containment, readily available spill kits, and appropriate personnel training.

- Considers additional safeguards for the transport of contaminated materials (e.g., lead-impacted sediment, petroleum-contaminated soils, batteries, tar residues) over long distances and across frozen lakes. Risks include container failure, load shifting, and secondary release. Measures should include sealed containers, secured loads, and prompt recovery and proper disposal of any released material.
- Considers measures to reduce ground disturbance in areas with thin snow cover, particularly in continuous permafrost and along new trail segments. Even low-speed travel may cause rutting, erosion, and long-term impacts. Identifying high-risk zones and outlining adaptive operational responses under variable snow and ground conditions is advised.
- Continues engagement with potentially affected communities and organizations, including Baker Lake and the local HTO. Considerations should include incorporating Inuit Qaujimajatuqangit and community knowledge, respecting traditional harvesting activities, supporting local training and employment, creating procurement opportunities for Inuit businesses, and providing regular project updates.

Transport Canada

- Does not have concerns about the proposed project but notes the Proponent is subject to the *Transportation of Dangerous Goods Act* and Transportation of Dangerous Goods Regulations.

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. The NIRB respectfully requests that a response be provided directly to the NIRB by **January 28, 2026**. Early submission of responses is welcomed and encouraged, should they be available prior to this deadline.

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
Justin Buller, Government of Nunavut, Department of Executive & Intergovernmental Affairs
Dianne Lapierre, Government of Nunavut, Department of Economic Development & Transportation
Natalie D'Souza, Government of Nunavut, Department of Economic Development & Transportation
Sean Joseph, Government of Nunavut, Department of Economic Development & Transportation
Tracey McCaie, Crown – Indigenous Relations and Northern Affairs Canada
Marcus Bermann, Crown – Indigenous Relations and Northern Affairs Canada