



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

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January 14, 2026

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 January 13, 2026 comments with respect to the **Notice of Screening for Peter's Expediting Ltd. "Pelly Lake Overland Haul" project proposal (25RN083)** provided to Mia Beattie, Impact Assessment Officer, Nunavut Impact Review Board (NIRB). We take these comments to heart and appreciate the feedback to allow our company to learn and grow. Thank you for your time and care in responding to our proposal.

Concern: Wildlife Management Plan

While this has been a common practice for the duration of the PEL overland haul operations in the past, admittedly we failed include specific management measures in our Wildlife-Land Management Policy. *Please refer to revised PEL Wildlife-Land Management Policy* included as Appendix A.

Concern: Spill Prevention

PEL has Health, Safety and Environmental Management policies that apply to all our operations and which have been designed specifically for the winter trail work that has been one of our core business lines since inception 27 years ago. Further, Salumaq prepared Project Specific Health and safety and environmental management plans for the Pelly Lake Remediation Project, including a spill response, and wildlife management and avoidance plan. These included some detail on winter work as well. It is both companies policies that all HASP and spill response plans are present at the work site and in vehicles during project work.

As requested, a standalone spill response plan has been prepared for the Winter trail phase of the project. Copies of the plan will be provided to each driver and will be present onboard each vehicle in the CAT trail. The spill response procedures as well as other Health, Safety and Environmental protection protocols will be reviewed with the field crews at the start of winter trail work, and will be discussed daily during morning tail gate meetings. A copy of the Spill response plan is included here as Appendix B.

Spill kits will be located in the Caboos of each CAT train as detailed in the Spill Response Plan.

Material Packing and movement:

All solid and liquid hazardous wastes were removed from the site by air in the summer. The only contaminated waste being transported over the winter trail back to Baker Laker is contaminated sediment and soil. Containers for transport were selected for durability and are compliant with Federal Transportation of Dangerous Good Regulations for land and marine movement for these specific materials and chemical contaminants. Additional specific container details are provided below.

Contaminated Sediment and Soil was excavated and direct loaded into heavy duty double lined mega bags with sealable tops. Bags were underfilled to ensure that the 1,500 kg capacity was not exceeded and to further mitigate potential tears and spills during movement or hauling. The bags will be strapped onto pallets prior to loading onto the CAT train. Bags and pallets will be secured to the sleds with straps and or chains. There are a total of 8 bags of soil/sediment to haul out of the site on the winter trail. Additional bags will be present on the train carrying the bags in case of a tear or spill so that loose contents can be collected up and re-contained in appropriate regulated containers for transport. A description of the mega bags that are used in provided below.

Type	Certification	Capacity	Picture	Description	Application
Mega Bags	UN13H4/X/CA N/4- 521/2450/136 1	Varies, approx. 1m3 to 1.5m3, (~1500kg)		FIBCs (flexible intermediate bulk containers) are made of flexible material and equipped with an interior liner. Suitable for storing dry bulk materials.	Contaminated soil and Sediments

Glass Debris from one area of the site was consolidated into one HDPE plastic drum with a sealable lid. This will be strapped to a pallet prior to loading onto the CAT trail. The drum and pallet will be secured to the sleds with ratchet straps and or chains for hauling back to Baker Lake. A detail of the plastic drum specifications is provided below.

Type	Certification	Capacity	Picture	Description	Application
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Type	Certification	Capacity	Picture	Description	Application
Plastic Drums	UN 1H2/Y 1.2/100	205 L		Sealed polymer drums for consolidation and transport of liquids.	Air Transport, Contaminated water and oils.

Scrap steel and other non-hazardous waste were cut to manageable size and consolidated in to cleaned “half tank” containers. Tank containers will be covered and secured with heavy duty tarps. Then containers will be blocked and chained to the CAT train sleds for hauling back to Baker Lake.

Loads will be continuously monitored in transit for shifting and damage. The trains will stop immediately if adjustments or re-strapping are required. Spills will be managed as detailed in the Spill response plan. Jetsam will be collected.

Concern: Archaeology

Peter's Expediting Ltd. understands the importance of avoiding and not disrupting archeological sites. This is why we are relying on the knowledge of a local Inuk Elder, whose family originates from the Aberdeen and Pelly Lake areas. He will be a part of the trail scouting crew. If we could please be given access to the Nunavut Archeological Site Database, this data can be used during our winter trail scouting trip in February 2026. We have attempted to locate the Database to no avail. If we may have access to this Database, a printed copy of all archaeological sites will be in each piece of equipment and our Caboose.

Based on your recommendations, PEL has chosen to proceed with Option 1: Strict Avoidance.

It has been common practice over the 27 years for PEL to travel overland on frozen waterbodies, avoiding any steep inclines. This is not only because we avoid any archaeological sites, but also our equipment and loads operate better on a flat surface. They may get stuck on eskers, ridges, etc.

PEL would like to inform the Government of Nunavut that the snow and ice thickness minimums stated in Salumaq's Winter Trail Plan section 3.4.1. is an error. PEL minimums are 18 inches of snow and 48 inches of ice, this information was reversed in error. For better understanding on trail construction, the following steps is what PEL follows:



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- Pre-trail scouting trip is conducted by snowmobile, once the ice thickens and snowpack approaches adequate operating parameters. The team will scout the entire planned route to identify area of lower snow pack that must be avoided. GPS is used to mark the trail alignment. Coordinates are shared with the train drivers when establishing the first trip.
- First trip of the season contains only the tractor hauling equipment and empty sleighs or light loads. This allows the trail to become compacted.
- Second, third, and continuing trails are then constructed via staggering the equipment to create a thicker, packed, widened trail. This will prevent any disturbance to the ground underneath the snow. Our trail becomes thicker to the point that during spring/summer thaw, normally the last parts of snow to melt are the remnants of our packed trail. The thawed ground is then left undisturbed.

At no time in the past or in our 2026 plans has there/will there ever be manipulation (cutting, shaving, notching, or filling) of the ground underneath the snow. Indeed there is no plowing or cutting of the snow pack either. Our equipment may come across a snow drift on top of our already established and compacted trail and manipulate only the snow to allow passage of the CAT train.

PEL equipment operates with GPS/Garmin inReach for the duration of the overland haul season. We will provide the Government of Nunavut with our log-in information within 30 days of project completion.

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. 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