

GN: 01	
Department	Culture and Heritage
Organization	Government of Nunavut
Subject/Topic	Archaeological and Palaeontological Resources
References	NIRB 126446/26QN031: Notice of Screening and Comment Request for Advanced Engineering Group Inc.'s "New quarry Permit to Pilitak Enterprises Ltd. at the Hamlet of Pangnirtung, Nunavut" Project Proposal
CONCERNS	
<p><i>Project Summary</i></p> <p>Advanced Engineering Group Inc., on behalf of Pilitak Enterprises Ltd., proposes to open a new quarry/aggregate source/borrow pit within the municipal boundaries of the Hamlet of Pangnirtung, in the vicinity of the existing hamlet quarry. GN notes that the scope of the Project includes site preparation, including removal of topsoil and overburden; extraction and processing of granular material, including excavation, crushing, screening, and stockpiling; hauling of extracted material to the existing hamlet quarry for blending and processing; and closure and reclamation, including re-grading, levelling, stabilization, and vegetation of disturbed areas. GN further notes that the Project would use heavy equipment, including excavators/backhoes, a front-end loader, and dump trucks.</p> <p>GN notes that the application materials identify the Project location being located on Commissioner's land and describe the proposed site as being located next to the metal dump site. However, the application materials do not identify a parcel, surveyed boundary, or mapped polygon defining the proposed aggregate pit/borrow source footprint or the full extent of associated Project-related ground disturbance. While the NIRB application does not identify any known heritage sites in the vicinity of the project location, the project application does not include mapping with a sufficient level of detail to confirm whether the project areas have been subject to previous archaeological assessment under a CH-issued permit.</p> <p>Based on landscape-level considerations, including the proximity of the property to the shoreline of Pangnirtung Fiord and nearby drainage channels, together with local travel and land use patterns demonstrated by previously recorded sites in the surrounding area, GN considers that there are reasonable grounds to believe there could be additional, as yet unrecorded, sites of archaeological significance on the lands proposed for Project-related impacts, pursuant to Article 33.5.12 of the <i>Nunavut Agreement</i>.</p> <p><i>Project-Specific Concerns</i></p> <p>GN notes that the proposed project includes activities involving terrestrial ground disturbance, which constitute potential impacts to archaeological resources. Impacts include, but are not limited to:</p> <ul style="list-style-type: none"> • site preparation at the new quarry/aggregate pit/borrow source, including removal of topsoil, overburden, and other surface materials; 	

- excavation and extraction of granular material within the quarry/aggregate pit/borrow source footprint, as well as any associated laydown and staging areas for material stockpiling or disposal;
- any equipment parking, servicing, storage, or temporary support areas associated with the quarry/aggregate pit/borrow source, where terrestrial ground disturbance is required;
- re-grading, levelling, stabilization, vegetation, closure, reclamation, and any other restoration activities at the new quarry/borrow pit or associated work areas; and
- any expansion, relocation, or modification of the quarry/aggregate pit/borrow source footprint, access routes, stockpile areas, overburden areas, laydown areas, or associated Project components.

GN notes that any ground disturbance occurring outside areas previously assessed through an archaeological assessment conducted under a permit issued by CH constitutes a potential impact to archaeological resources and requires archaeological assessment prior to disturbance (to ensure the Proponent can comply with the *Nunavut Archaeological and Palaeontological Sites Regulations* (NAPSR)).

RECOMMENDATIONS

To ensure compliance with the *Nunavut Act* and the NAPSR, the GN recommends that the Proponent consult directly with CH on archaeological requirements for specific Project components through CH's archaeological permitting and regulatory review processes prior to any ground disturbance, including any requirements for archaeological assessment, avoidance, buffering, monitoring, mitigation, and chance-find response. This consultation should include detailed mapping or geospatial data showing the proposed quarry/aggregate pit/borrow source footprint, as well as any associated areas of ground surface impacts (e.g. access and haul areas, material storage/stockpile areas, equipment staging areas, drainage management areas, and closure/reclamation areas), even where these may be temporary in nature. Where CH cannot confirm that proposed disturbance areas have been previously assessed, archaeological assessment may be required prior to disturbance, and any such assessment must be completed under a CH-issued permit.

GN further recommends that the Proponent apply the following standard protections during Project planning and implementation::

- **Site protection:** 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 during the course of Project activities. CH recommends that known or newly recorded archaeological sites are avoided using a minimum 50 metre buffer, or greater where directed by CH.
- **Chance finds:** If archaeological and/or palaeontological materials or features are encountered, all activities shall cease immediately within the protective buffer area. The site shall be documented (including coordinates, description, and photographs) and reported to CH, and work shall not resume within the buffer area until direction is provided by CH.
- **General protections:** No alteration, disturbance, artifact removal, littering, or defacement of archaeological sites is permitted. No collection or disturbance shall occur unless authorized through the appropriate permitting process. The Proponent

shall ensure that all staff and contractors are informed of these legal obligations. The construction of inuksuit is not supported.

ADDITIONAL COMMENTS

Under the *Nunavut Act*, the *Nunavut Archaeological and Palaeontological Sites Regulations* provide for the protection, care, and preservation of archaeological and palaeontological resources. The Department of Culture and Heritage is the Designated Agency responsible for the administration of the archaeological and palaeontological permitting system, in close coordination with Inuit land claim partners, including 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.