CIRNAC Comments to NIRB

Re: Notice of Screening for Advanced Engineering Group Inc.'s "New Quarry Permit to Pilitak Enterprises Ltd. at the Hamlet of Pangnirtung, Nunavut" Project Proposal

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

Your file - Votre référence
26QN031
Our file - Notre référence
GCdocs# 147201899

June 1, 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 Advanced Engineering Group Inc.'s "New Quarry Permit to Pilitak Enterprises Ltd. at the Hamlet of Pangnirtung, Nunavut" Project Proposal

Dear Mia Beattie,

On May 8, 2026, the Nunavut Impact Review Board (NIRB) invited parties to comment on Advanced Engineering Group Inc.'s "New Quarry Permit to Pilitak Enterprises Ltd. at the Hamlet of Pangnirtung, Nunavut" project proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) appreciates the opportunity to provide comments and 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: Overburden, Organic Soil, and Waste Material Management

The proposed work includes removal of topsoil and overburden, and the waste section of the application identifies overburden (organic soil, waste material, tailings) as a project waste stream. However, the projected amount generated is listed as "unknown", and the disposal method is identified only as "trucking", with no additional treatment procedures identified. This is an information gap because the environmental effects associated with borrow pit development are often closely tied to the quantity, handling, storage, reuse, or disposal of stripped materials. Without estimated quantities and a defined management approach, it is not possible to assess erosion risk, stockpile stability, organic soil conservation for use in reclamation, or whether off-site disposal could create additional environmental liabilities. CIRNAC recommends that the Proponent consider:

- Clarifying the types of materials that would be stripped or generated, including overburden, organics, unsuitable material, and any other waste streams;
- Providing estimated quantities of these materials and identifying whether they would be stored on site, reused in closure, or transported elsewhere; and

- Confirming how organic soils and other suitable materials would be conserved, where feasible, to support site stabilization and reclamation.

CIRNAC #2: Potential Interaction with the Adjacent Metal Dump Site

The application indicates that the proposed quarry site is located next to the metal dump site, but does not provide information regarding whether the proposed excavation area is hydraulically or physically separated from that adjacent disturbed area. Quarrying activities would involve removal of topsoil and overburden and exposure of subsurface materials, which may alter local drainage and runoff pathways. In the absence of supporting site characterization, it is not possible to assess whether excavation, runoff, or sediment transport from the proposed borrow area could mobilize material associated with the adjacent dump area, including potentially contaminated soils, metal debris, or residual waste-derived material. While the application states that runoff is expected to consist primarily of naturally occurring sediments, this conclusion is not supported by baseline soil or drainage information specific to the site context. CIRNAC recommends that the Proponent consider:

- Providing information demonstrating whether the proposed quarry footprint and drainage area are separated from the adjacent metal dump site;
- Describing site characterization relied upon to support the conclusion that excavation would not mobilize legacy waste or affected soils; and
- Clarifying whether any contingency measures would be available should unsuitable or anthropogenically affected material be encountered during stripping or excavation.

CIRNAC #3: Fuel Storage, Handling, and Secondary Containment

The application indicates that heavy equipment, including two backhoes/excavators, one front-end loader, and two dump trucks, would be used during quarry operations, indicating a reliance on petroleum products and associated spill risk during equipment operation and any refueling activities. Although the application states that a spill contingency plan will be in place to address unforeseen spills, the materials reviewed do not include the actual plan or site-specific information regarding spill kit availability, response roles, notification procedures, contaminated-soil handling, or the location and method of refueling. In the absence of this information, it is difficult to assess whether spill prevention and response measures are proportionate to the scale and nature of the proposed operation. The application materials also contain differing statements regarding whether fuel would be stored on site, including a reference to 90 diesel containers at 200 L each (18,000 L total) in the revised application and a statement in the executive summary that no fuel will be stored on site, which would benefit from clarification. CIRNAC recommends that the Proponent consider:

- Providing a fuel and hazardous-materials inventory for the quarry operation, including fuel types, containerization, and the maximum volumes anticipated to be present at one;
- Clarifying whether any fuel would be stored, staged, or transferred at the proposed quarry site or whether refueling would occur elsewhere; and
- Describing spill response procedures, spill kit availability, and personnel training requirements during fuel handling activities.

CIRNAC #4: Consultation with the Hamlet of Pangnirtung

CIRNAC recommends that the Proponent continue engaging with the Hamlet of Pangnirtung regarding its project proposal. As part of these consultation activities, several issues should be considered, including but not limited to:

- Incorporation of Inuit Qauijimajatuqangit and community knowledge in project activities;
- Mitigation measures to prevent any disturbance to wildlife and the environment;
- Mitigation measures to prevent disturbance to sites of cultural, archaeological, and/or environmental significance;
- The experience of community members who may 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 or David Abernethy by email at david.abernethy@rcaanc-cirnac.gc.ca.

Sincerely,

Richard Bingley
Manager, Impact Assessment