

Pilitak's Response to CIRNAC's Comments

Mia Beattie
Impact Assessment Officer
Nunavut Impact Review Board (NIRB)
P.O. Box 1360
Cambridge Bay, NU X0B 0C0

Subject: Response to CIRNAC Comments – New Quarry Permit Application for Pilitak Enterprises Ltd., Pangnirtung, Nunavut

Dear Ms. Beattie,

Pilitak Enterprises Ltd. would like to thank the Nunavut Impact Review Board (NIRB) and Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) for their review of the proposed New Quarry Permit Application for Pangnirtung, Nunavut.

The following provides Pilitak Enterprises Ltd.'s responses to the comments and recommendations submitted by CIRNAC.

CIRNAC COMMENT #1 – OVERBURDEN, ORGANIC SOIL, AND WASTE MATERIAL MANAGEMENT

Comment 1(a):

Clarify the types of materials that would be stripped or generated, including overburden, organics, unsuitable material, and any other waste streams.

Pilitak Response:

The materials expected to be generated during stripping of the quarry site will primarily consist of a thin layer of mosses, lichens, organic-rich soils, unconsolidated glacial till, weathered rock, and fine-grained materials such as silt and clay. The fine-grained material is the target resource for extraction and will be transported for blending with coarse aggregate produced from the existing Hamlet quarry to achieve the required runway surfacing specifications.

No waste streams are anticipated beyond the naturally occurring overburden and organic materials removed during site preparation.

Comment 1(b):

Provide estimated quantities of these materials and identify whether they would be stored on site, reused in closure, or transported elsewhere.

Pilitak Response:

Pilitak estimates that approximately 200 m³ of overburden and organic material will be stripped from the proposed quarry area. These materials will be stockpiled adjacent to the quarry in a designated area and preserved for future reclamation activities. The stockpiled material will not be disposed of off-site and will instead be reused during quarry closure and environmental restoration activities.

Comment 1(c):

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

Pilitak Response:

Organic soils and tundra vegetation mats will be carefully stripped and preserved to maximize their future reclamation value. Where practical, vegetation mats will be removed in large intact sections to preserve native root structures and seed banks. Stockpiles will be maintained in low-profile configurations, generally less than two metres in height, to preserve soil viability and minimize erosion.

As quarry operations progress and areas become exhausted, conserved organic material will be

progressively reapplied to disturbed areas to promote natural revegetation, provide thermal insulation to underlying permafrost, improve surface stability, and support long-term reclamation objectives.

CIRNAC COMMENT #2 – POTENTIAL INTERACTION WITH THE ADJACENT METAL DUMP SITE

Comment 2(a):

Provide information demonstrating whether the proposed quarry footprint and drainage area are separated from the adjacent metal dump site.

Pilitak Response:

The proposed quarry footprint is physically and hydraulically separated from the adjacent metal dump site. Existing site topography, together with a perimeter berm surrounding the metal dump area, provides separation between the two locations.

Surface runoff from the proposed quarry naturally drains toward a swale located between the quarry area and the metal dump berm. Water is subsequently conveyed through an existing culvert beneath the roadway before discharging toward the nearby river system. Based on existing site conditions, there is minimal potential for runoff generated within the quarry area to interact with the metal dump site.

Comment 2(b):

Describe site characterization relied upon to support the conclusion that excavation would not mobilize legacy waste or affected soils.

Pilitak Response:

Site observations indicate that the metal dump occupies lower ground and is protected by a surrounding berm. The proposed quarry area is situated separately from the dump and is governed by natural drainage patterns that direct runoff away from the dump area.

Prior to commencing operations, Pilitak will inspect and verify the integrity of the metal dump berm and the adjacent drainage swale to ensure continued separation of drainage pathways. Based on these site conditions, Pilitak does not anticipate excavation activities mobilizing legacy waste materials, contaminated soils, or other anthropogenically affected materials.

Comment 2(c):

Clarify whether any contingency measures would be available should unsuitable or anthropogenically affected material be encountered during stripping or excavation.

Pilitak Response:

Should anthropogenically affected materials, contaminated soils, or any unsuitable material be encountered during quarry development, Pilitak will immediately implement a “Stop, Isolate, Notify, and Assess” protocol.

Work will cease within the affected area, and the location will be isolated and secured. Appropriate erosion and runoff controls, including berms, silt fencing, and containment measures, will be installed as required. Regulatory authorities, including the Nunavut Spill Line and relevant land-use authorities, will be notified in accordance with applicable requirements. A qualified environmental professional will be retained to assess the affected area, characterize any contamination, and recommend appropriate management measures. Any impacted materials will be segregated, stored safely, and managed in accordance with an approved remediation or disposal plan and all applicable regulatory requirements.

CIRNAC COMMENT #3 – FUEL STORAGE, HANDLING, AND SECONDARY CONTAINMENT

Comment 3(a):

Provide a fuel and hazardous-materials inventory for the quarry operation, including fuel types, containerization, and maximum volumes anticipated to be present on site.

Pilitak Response:

The proposed quarry operation will utilize a limited fleet consisting of up to two backhoes, one excavator, one front-end loader, and supporting haul trucks as required.

No bulk fuel storage facilities are proposed for the quarry site. Diesel fuel will remain only within the equipment fuel tanks. The total quantity of diesel fuel present at the site at any given time is expected to be less than approximately 1,000 litres, representing the combined fuel capacity of the operating equipment. No crusher will be on this quarry and truck will be park else where.

Comment 3(b):

Clarify whether any fuel would be stored, staged, or transferred at the proposed quarry site or whether refuelling would occur elsewhere.

Pilitak Response:

No fuel will be stored, staged, or transferred at the proposed quarry site. Refuelling activities will occur at approved locations associated with the overall runway rehabilitation project and through local fuel delivery services as required. No refuelling will occur on this quarry.

Comment 3(c):

Describe spill response procedures, spill kit availability, and personnel training requirements

during fuel handling activities.

Pilitak Response:

The proposed quarry operation forms part of Pilitak’s larger runway rehabilitation project in Pangnirtung. Existing project-wide environmental protection measures include spill prevention and response procedures, spill response kits, trained personnel, incident reporting procedures, and containment equipment.

These established procedures and resources will be extended to the proposed quarry operation. All personnel operating equipment will be trained in spill prevention, spill response, reporting requirements, and environmental protection measures. Appropriate spill response equipment will be readily available whenever equipment is operating within the quarry area. One complete spill kit will be available at the quarry site.

CIRNAC COMMENT #4 – CONSULTATION WITH THE HAMLET OF PANGNIRTUNG

Comment 4(a):

Incorporation of Inuit Qaujimajatuqangit and community knowledge in project activities.

Pilitak Response:

Pilitak recognizes the importance of Inuit Qaujimajatuqangit and community knowledge. The company will continue engaging with community representatives, local organizations, and the Hamlet of Pangnirtung to incorporate local knowledge into project planning and implementation where appropriate.

Comment 4(b):

Mitigation measures to prevent disturbance to wildlife and the environment.

Pilitak Response:

Community members, including local organizations and stakeholders, will continue to be consulted regarding wildlife use patterns and environmental sensitivities. Project activities will be conducted in a manner that minimizes disturbance to wildlife and the surrounding environment.

Comment 4(c):

Mitigation measures to prevent disturbance to sites of cultural, archaeological, and environmental significance.

Pilitak Response:

No known archaeological or cultural resources have been identified within the proposed quarry

area. Nevertheless, should any archaeological, cultural, or heritage resources be discovered during operations, all work will cease immediately in the affected area. The site will be protected, and the appropriate Government of Nunavut heritage authorities will be notified before any further work proceeds.

Comment 4(d):

The experience of community members who may participate in traditional harvesting activities within or in close proximity to the project area.

Pilitak Response:

Pilitak will continue engaging with local Hunters and Trappers Organizations and community members to understand harvesting activities and wildlife-use patterns within the vicinity of the project area and to minimize any potential interference with traditional land use.

Comment 4(e):

Training and employment opportunities for Inuit and community members.

Pilitak Response:

The runway rehabilitation project, including this quarry operation, provides employment and training opportunities for local residents. Pilitak remains committed to maximizing Inuit and local participation wherever practical.

Comment 4(f):

Procurement opportunities for local and Inuit-owned businesses.

Pilitak Response:

In accordance with project commitments and applicable requirements, Pilitak continues to utilize local businesses, contractors, and suppliers whenever practical and economically feasible. The company remains committed to supporting local economic development opportunities.

Comment 4(g):

Regular updates on the status of project activities.

Pilitak Response:

The Hamlet of Pangnirtung has been regularly informed regarding project activities and remains an important stakeholder. The proposed quarry permit application was initiated following discussions regarding the need for additional fine material to support the runway rehabilitation project. Pilitak will continue providing updates to the Hamlet and other stakeholders throughout the permitting and operational phases of the project.

Pilitak Enterprises Ltd. appreciates CIRNAC's review and comments. We trust that the information provided above addresses the matters raised and assists NIRB in its assessment of the proposed quarry permit application.

Should additional information be required, Pilitak Enterprises Ltd. would be pleased to provide further clarification.

Sincerely,



Marc-André Bastien B.ing.

Project manager

PILITAK ENTERPRISES LTD.

GN COMMENT 1 – ARCHAEOLOGICAL AND PALAEOLOGICAL RESOURCES

GN Comment:

The Government of Nunavut notes that the project includes terrestrial ground disturbance activities associated with site preparation, excavation, stockpiling, hauling, equipment operation, closure, reclamation, and any future modifications to the quarry footprint. The application materials do not provide sufficient information to confirm whether all proposed disturbance areas have previously undergone archaeological assessment under a permit issued by the Department of Culture and Heritage.

Pilitak Response:

Pilitak acknowledges the Government of Nunavut's concerns regarding the potential presence of archaeological and palaeontological resources within the proposed quarry area and associated disturbance zones.

Pilitak is fully committed to complying with the Nunavut Act, the Nunavut Archaeological and Palaeontological Sites Regulations (NAPSR), Article 33 of the Nunavut Agreement, and all requirements established by the Department of Culture and Heritage.

Prior to undertaking any ground disturbance activities in areas that have not previously been assessed and cleared by CH, Pilitak will consult directly with the Department of Culture and Heritage and provide detailed site plans, mapping, coordinates, geospatial information, and descriptions of all proposed disturbance areas, including:

- Quarry extraction areas;
- Overburden and stockpile areas;
- Equipment staging and laydown areas;
- Temporary access and haul roads;
- Drainage management features; and
- Closure and reclamation areas.

Where required by CH, Pilitak will coordinate on site with a qualified archaeologist retain by the GN and undertake an Archaeological Impact Assessment (AIA) or any other archaeological investigations required by CH under a valid permit issued by the Department prior to commencement of ground disturbance activities.

GN RECOMMENDATION – CONSULTATION WITH CULTURE AND HERITAGE

GN Recommendation:

The Government of Nunavut recommends that the Proponent consult directly with CH regarding archaeological requirements and provide detailed mapping or geospatial information to determine whether archaeological assessment, mitigation, monitoring, buffering, avoidance measures, or other requirements are necessary.

Pilitak Response:

Pilitak accepts this recommendation and has already initiated communication with the Department of Culture and Heritage regarding the proposed quarry development. Detailed mapping and geospatial information identifying all proposed disturbance areas will be provided to CH for review. Pilitak will comply with any archaeological assessment, monitoring, mitigation, avoidance, buffering, permitting, or reporting requirements established by CH before undertaking any ground disturbance activities.

GN RECOMMENDATION – SITE PROTECTION

GN Recommendation:

All archaeological and palaeontological sites in Nunavut are protected by law. The Proponent must ensure that no heritage sites are disturbed and should maintain a minimum 50-metre buffer around known or newly discovered archaeological sites unless otherwise directed by CH.

Pilitak Response:

Pilitak fully acknowledges and respects the legal protection afforded to archaeological and palaeontological resources throughout Nunavut. Should any known archaeological or palaeontological sites be identified within or near the project area, Pilitak will establish and maintain the minimum 50-metre protective buffer recommended by CH, or any greater setback distance directed by the Department. No excavation, hauling, stockpiling, equipment operation, or other project activities will occur within designated protection zones.

GN RECOMMENDATION – CHANCE FIND PROCEDURE

GN Recommendation:

If archaeological or palaeontological materials are encountered, all work shall cease immediately within the affected area, the discovery shall be documented and reported, and work shall not

resume until authorization is received from CH.

Pilitak Response:

Pilitak will implement a formal Chance Find Procedure for all project activities.

Should archaeological or palaeontological materials, artifacts, features, fossils, bone fragments, cultural materials, tent rings, burial features, or other heritage resources be discovered during excavation:

- All work within the affected area will cease immediately;
- The discovery location will be protected from disturbance;
- GPS coordinates, photographs, and site descriptions will be documented;
- The Department of Culture and Heritage will be notified immediately; and
- Work will not resume within the affected area until written authorization is received from CH.

All project personnel, subcontractors, and equipment operators will be informed of these procedures before construction activities commence.

GN RECOMMENDATION – GENERAL PROTECTIONS

GN Recommendation:

The Proponent must ensure that archaeological sites are not altered, disturbed, defaced, excavated, or collected from unless specifically authorized through the appropriate permitting process.

Pilitak Response:

Pilitak agrees with this recommendation and will ensure that all employees, subcontractors, supervisors, and equipment operators understand and comply with their obligations under the Nunavut Archaeological and Palaeontological Sites Regulations.

Project orientation and environmental awareness training will include specific instruction regarding archaeological resource protection, reporting requirements, site avoidance measures, and chance-find procedures.

No archaeological or palaeontological materials will be disturbed, collected, removed, or altered unless specifically authorized by the Department of Culture and Heritage through the appropriate permitting process.

ADDITIONAL INFORMATION AND REQUEST TO NIRB

Pilitak respectfully notes that the proposed new quarry operation is not a standalone project but

rather a small component of the larger Pangnirtung Airport Runway Resurfacing Project currently under construction.

This runway rehabilitation project is a federally funded infrastructure project with a strict completion deadline of December 2026. The proposed quarry will supply fine-grained material required to blend with aggregate produced from the existing Hamlet quarry in order to meet Transport Canada and airport runway material specifications. The availability of this material source is critical to the successful completion of the runway resurfacing project within the approved project schedule.

The proposed quarry operation represents only a small portion of the overall project. Consequently, all environmental management systems, operational procedures, trained personnel, equipment resources, spill response measures, safety programs, and regulatory compliance processes already established for the larger runway rehabilitation project will also apply to this quarry operation.

Pilitak fully acknowledges the concerns and recommendations of the Department of Culture and Heritage and is committed to satisfying all applicable archaeological and heritage protection requirements before commencing any ground-disturbing activities within areas requiring review or assessment.

Pilitak has already initiated discussions with the Department of Culture and Heritage and will continue working closely with departmental staff to determine and fulfill all applicable archaeological assessment, permitting, mitigation, monitoring, avoidance, buffering, and reporting requirements.

Accordingly, Pilitak respectfully requests that NIRB issue the requested quarry permit subject to the condition that Pilitak satisfies all applicable requirements of the Department of Culture and Heritage prior to undertaking any ground-disturbing activities within the proposed quarry area. Pilitak appreciates the Government of Nunavut's review and recommendations regarding archaeological and palaeontological resource protection.

Pilitak remains committed to working collaboratively with the Department of Culture and Heritage, Inuit Heritage Trust, NIRB, and all regulatory agencies to ensure that project activities are undertaken in a safe, environmentally responsible, and culturally respectful manner while supporting the timely completion of this important airport infrastructure project for the community of Pangnirtung.

We trust that the information provided above adequately addresses the concerns raised by the Government of Nunavut and respectfully request NIRB's favourable consideration of this application.

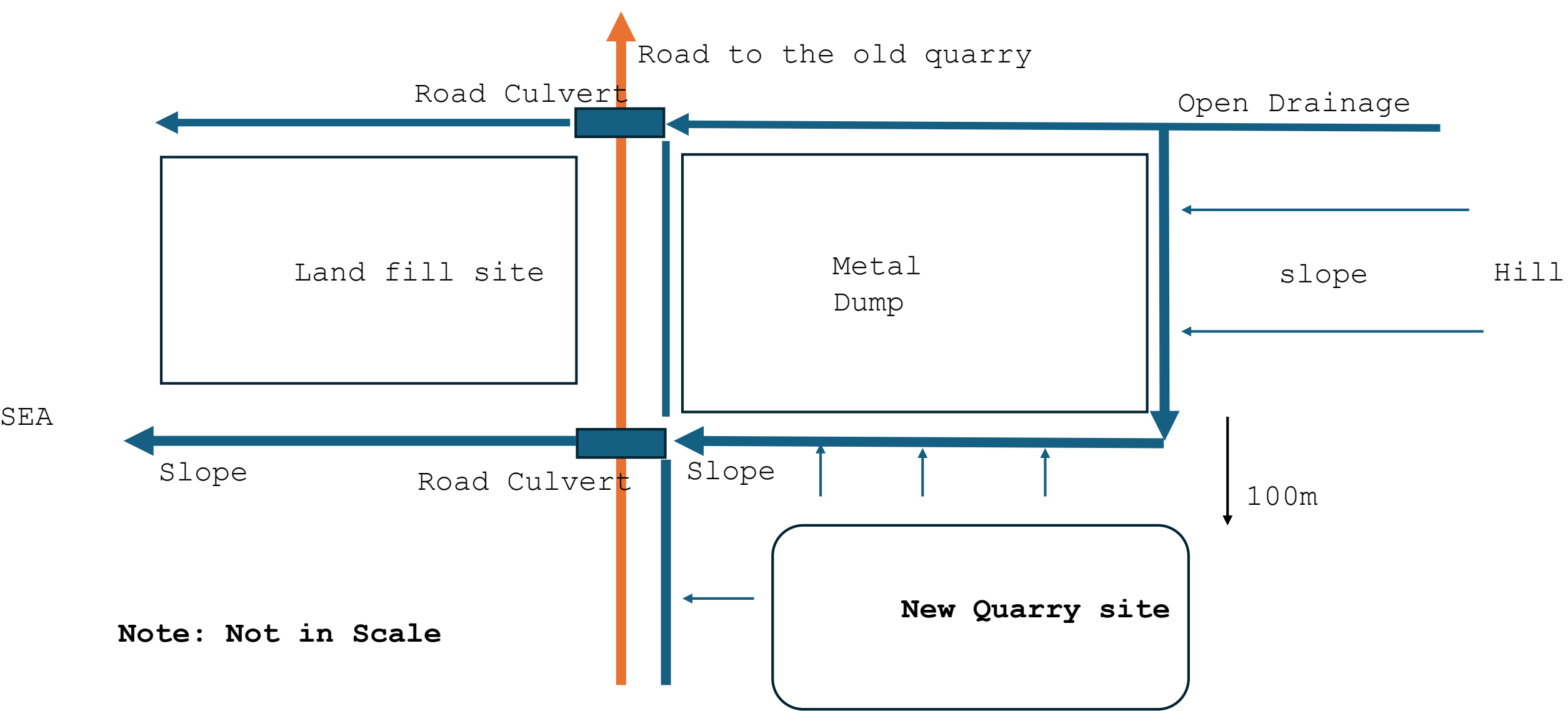
Sincerely,



Marc-André **Bastien** B.ing.

Project manager

PILITAK ENTERPRISES LTD.



Note: Not in Scale

Pangnirtung new Quarry site