

Pilitak's Response to GN's comments

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

**Subject: Response to Government of Nunavut Comments – NIRB File No. 26QN031 – New
Quarry Permit to Pilitak Enterprises Ltd. at the Hamlet of Pangnirtung, Nunavut**

Dear Ms. Beattie,

Pilitak Enterprises Ltd. would like to thank the Government of Nunavut (GN), Department of Culture and Heritage (CH), and the Nunavut Impact Review Board (NIRB) for reviewing the proposed New Quarry Permit Application and for providing comments regarding the protection of archaeological and palaeontological resources.

Pilitak recognizes the importance of protecting Nunavut's archaeological and palaeontological heritage and is committed to ensuring that all project activities are conducted in full compliance with applicable legislation, regulations, permit requirements, and best management practices.

The following responses address the concerns and recommendations raised by the Government of Nunavut.

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.