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Attn: Sharon Ehaloak, Executive Director
Nunavut Planning Commission
c/o Jonathan Savoy, Senior Planner
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March 4, 2016

RE: Submission of Comments on the Technical Meetings and Considerations for Potential Refinements

Dear Sharon Ehaloak and staff,

Please find enclosed the comments from WWF-Canada on the three technical meetings and the document entitled 'Considerations for Potential Refinements to the 2014 Draft Nunavut Land Use Plan'. WWF-Canada has been present at all three of the recent technical meetings, commenting on issues that pertain to the implications of land use planning on wildlife and people in Nunavut, and working with partners to identify ways to improve the current draft of the plan.

In this first generation of the plan, we strongly propose that a precautionary approach be taken to protect the ecological values identified through consultation with Nunavummiut, TEK/IQ studies, and scientific surveys, through assigning 'Protected Area' designations where appropriate. Such examples include but are not limited to polar bear denning areas, walrus haul outs, marine Ecologically and Biologically Significant Areas (EBSAs), key migratory bird sites, caribou calving and post calving grounds, caribou key access corridors, and caribou freshwater crossings. The ecological values contained within these sites can be protected through a variety of year-round, seasonal, broad, or specific limitations, which would represent a compromise between development and conservation interests.

One of our biggest concerns is the misconception that continues to be present during technical meetings on the role of 'Protected Areas' and 'Special Management Areas' under the plan. The use of the term 'Protected Area' in the planning process has caused confusion. As used commonly, the term 'Protected Area' is synonymous with legislatively created, permanent areas where most forms of industrial development are prohibited. However, the designation of 'Protected Area' as employed by the Nunavut Land Use Plan does not describe permanent legislated protection but rather creates an impermanent protection that can be reversed when project proponents apply for exemptions or plan amendments. We are of the opinion that the Planning commission would do much to clarify the confusion by replacing the term 'Protected Area' by another term, such as 'Area of High Ecological or Cultural Value'.

While we provide these comments to the document entitled 'Considerations for Potential Refinements to the 2014 Draft Nunavut Land Use Plan', we will be bringing additional issues as the planning process unfolds. In particular, we will be bringing forward considerations on such areas as planning in the marine environment and in particular in the Last Ice Area. The Last Ice Area is where climate change models predict that summer sea ice is projected to persist the longest. There is thus a need to ensure that proper land use planning for both the terrestrial and marine portions of this ecosystem is in place to mitigate the environmental stressors of this fragile habitat.

We would like to acknowledge the Nunavut Planning Commission for their continued work on the Nunavut Land Use Plan initiative. We look forward to further engagement in the planning process as an active participant, including at the upcoming caribou and marine shipping workshops in Iqaluit.

Sincerely,

A handwritten signature in black ink that reads "Paul Crowley". The signature is written in a cursive style with a large initial "P" and a long horizontal stroke at the end.

Paul Crowley
Vice President, Arctic
WWF-Canada

1) Walrus Haul-outs

Issue: Should walrus haul-outs be designated as Protected Areas in the NLUP?

We are in support of option 1, which would afford walrus haul-outs a Protected Area designation that would prohibit incompatible uses on land and include marine setbacks, subject to safe navigation. As noted in the Refinements document, the implications of this designation are several small Protected Areas that do not cover a significant geographical area. In recommending option 1, we echo the sentiment of the Qikiqtaaluk Wildlife Board (QWB), who through previous submissions and in-person accounts at the technical meetings have described the importance of not disturbing critical walrus haul-outs due to the high level of sensitivity of walrus to disturbance. We note however that the current polygons for walrus haul-outs are undoubtedly not fully representative of the species distribution and habitat usage, nor do they sufficiently represent the knowledge of Qikiqtani and Kivalliq communities who rely on walrus for subsistence hunting. Thus, to identify walrus haul-outs as requiring Protected Area status necessitates the identification and mapping of all Inuit valued walrus haul-out sites in order for the NLUP to meet its objectives for this particular issue. The Government of Canada noted in the technical meeting that they are in support of a Protected Area status if sufficient information and evidence exists to support the designation and assign prohibitions on activities. We believe that this information already exists in multiple forms, that it is robust, and that its incorporation into the NLUP could be accomplished in the timelines outlines for the finalization of the plan.

In this regard, we have three recommendations. We propose that:

- a) All currently documented walrus haul-outs be designated as Protected Areas.
- b) The Nunavut Planning Commission (NPC) mine previously documented knowledge of walrus habitat from previous NPC consultations, the Nunavut Coastal Inventory, the in-progress DFO Atlantic walrus management plan, and any other internally available consultation records to fully document the breadth of Inuit knowledge on walrus haul-outs and the need to safeguard these sites from disturbance and incorporate this information into the next iteration of the plan.

2) Polar Bear Denning Areas

Issue: Should polar bear denning areas be designated as Protected Areas in the NLUP?

We are in support of option 1, which would afford polar bear denning areas a Protected Area designation that would prohibit incompatible uses. It is noted in the implications associated with this option that this would result in many additional Protected Areas that cover a large geographic area. There are multiple factors to consider that address this implication. The first is that it would only be necessary to limit incompatible uses in polar bear denning areas during the late fall and winter months when female polar bears enter and remain in their dens until early spring. While the seasonality of this sensitive period differs slightly between subpopulations, a seasonal designation from the beginning of October through to the end of March would allow for a precautionary approach that would safeguard polar bears while they exploit this critical habitat. Second, it should be considered that even though an area is designated as a Protected Area in the NLUP, it does not restrict proponents from applying for exemptions of amendments to the NLUP if required. The establishment of a Protected Area under the

NLUP simply adds an extra temporary layer of scrutiny for projects to address identified values, and is not equivalent to establishing a national or territorial park.

We support the QWB and echo their sentiment of the need to implement a precautionary approach for polar bear denning areas, and indeed all sensitive wildlife areas that Nunavummiut identify as critical. As additional information is obtained that is capable of refining the geographic extent of polar bear denning areas, it will become possible to limit the extent of the Protected Area polygons for polar bear denning areas. However, geographic extent alone should not be a deciding factor in terms of Protected Area designation. If the intention of the polar bear denning area polygons are to safeguard polar bears during the denning portion of their lifecycle, starting from a position of a precautionary approach is the most comprehensive and appropriate way forward. Designating these areas as Special Management Areas with direction to regulatory authorities (with the current set of restrictions and limitations associated with Special Management Areas) is not sufficient to address the threats of disturbance on denning polar bears. The NIRB review process does not consider the cumulative effects of multiple projects within the same subpopulation boundaries, and thus has the potential to contribute to negative population impacts.

In this regard, we propose that:

- a) The Special Management area for polar bear denning areas be replaced with a Protected Area designation.

3) Sabine Peninsula

Issue: Should the Sabine Peninsula be designated as a Protected Area in the NLUP?

We are in support of option 1, which would afford the Sabine Peninsula a Protected Area designation that would prohibit incompatible uses and retain migratory bird setbacks. Peary caribou are designated as a Threatened species by COSEWIC, with the future conservation of the species at risk primarily due to changes in food availability, industrial development, and reductions in sea ice crossing habitat. We agree with the Government of Canada that the simplest solution would be to afford this area a Protected Area status to avoid a lengthy amendment process in the future. We would add that it should be noted in the description of this Protected Area that it was conceived to accomplish two purposes: to protect a key bird habitat site, and to protect critical Peary caribou habitat. It is noted in the implications for option 1 that this areas includes existing oil and gas significant discovery leases. The pre-existing nature of these licenses will be dealt with through discussions on grandfathering of industrial leases. To consider the existence of licenses in whether or not to create a Protected Area for conservation purposes would not be appropriate.

In this regard, we propose that:

- a) The Sabine Peninsula Special Management Area be replaced with a Protected Area designation in recognition that this area is critical habitat for Peary caribou.

4) Caribou Habitat

Issue: How should caribou habitat be treated in the NLUP?

We are in support of options 1, 2, 3, 4, 6, and 7. We are in partial support of option 5.

The current state of barren-ground caribou herds across the territory of Nunavut is perilous. All of the major herds are in decline, with a recent publication even indicating that the Beverly herd may be lost forever after a merger of the last remaining individuals with the neighbouring Ahiak herd. Careful and precautionous management is needed to allow for the recovery of these herds to levels that can sustain the communities that rely on them. While there are relatively few environmental factors governing caribou conservation status that we can control, the most effective intervention by people is effective land use planning.

We are in support of designating Protected Area status to areas of high mineral potential that overlap with core calving, and post calving grounds (and thus, key access corridors as well as they are contained within the post calving grounds). For the negative population trend of caribou to reverse, caribou must have unfettered access to critical habitat that allows for maximum reproductive output. Calving and post-calving grounds have been identified by both scientific and IQ studies as being areas where caribou are extremely sensitive to disturbance. Throughout the technical meetings, as well as at the Nunavut Wildlife Management Board caribou workshop, we have heard many accounts from wildlife boards, local hunters, and community members on the need and desire to safeguard caribou calving and post calving grounds year-round from activities that can disturb the caribou, including industrial development. We are in support of a precautionary approach to managing these critical habitats, through the year-round prohibition of industrial activities.

The designation of Protected Area status does not create a National or Territorial Park, nor does it confer total prohibition on incompatible uses in the short or long term. Rather, it assigns incompatible uses that require exemptions or amendments in order to protect identified values within specifically bounded geographical areas of Nunavut. Assigning Protected Area status will require new industrial development projects to apply for a plan exemption or amendment in order to explore/operate within a calving ground. At which point, the pros and cons can be weighed by NPC on the merits of such an application.

Should Protected Area status not be assigned to caribou calving and post calving grounds is that we may irreversibly hinder, or greatly dampen the reproductive capacity and viability of caribou herds in Nunavut. The relatively small geographic extent of the GN identified calving and post-calving grounds represents a conservative estimate, not an absolute representation of the known calving areas of Nunavut. A purely conservation approach would dictate the protection of the historical calving grounds, which would cover a large extent of land in the territory. By assigning Protected Area status to the telemetry derived core caribou calving and post-calving grounds based on the best available information, a compromise is already being struck between caribou protection and economic development in the territory.

We are in support of Option 4, which would designate caribou freshwater crossings as Protected Area status. The evidence put forward by the KWB and the HTOs of the Kivalliq region clearly

demonstrates both the cultural and ecological importance of these areas, and the need to prohibit industrial development in the vicinity of caribou fresh water crossings.

We are in partial support of Options 5, which would designate caribou sea ice crossings as Special Management Areas. Due to highly seasonal use of this habitat, the dependence of caribou on these crossings, and the ability of a relatively small ice-breaking disturbance to have a significantly detrimental effect on the ability of caribou to cross between islands, we feel that strong protection measures are required in areas where caribou have been well documented to cross. We are in partial support in the Special Management Area designation depending on the nature and the timeframe of the prohibited activities.

We are in support of Options 6, and 7, which would designate rutting areas, and migration corridors as Special Management Areas. Due to the decreased sensitivity of caribou during these times in their lifecycle, and the need for the plan to strike a compromise between conservation and development, we feel a Special Management Area designation designed to track the cumulative impacts of multiple projects on individual caribou herds in Nunavut would be sufficient. We acknowledge the implication that this would create many Special Management Areas covering a large geographic area. However, if the intention of the Special Management Area is to monitor cumulative effects and to flag the need to consider caribou as an identified value in areas where projects are proposed, the impact of these areas on proponents would be minimal.

We applaud the NPC for the acknowledgement of the importance of caribou conservation measures as demonstrated through the most recent iteration of the plan which afforded Protected Area status to the core calving and post calving grounds without high mineral potential, as well as through the organizing of the forthcoming caribou workshop. We feel strongly that the non-permanent and non-absolute nature of Protected Areas and Special Management Areas should be acknowledged by all parties. Relatively little is being forfeited through designating the critically important caribou habitats as Protected Areas and Special Management Areas under the plan, compared to the enormous risks of permitting land uses which could irreversibly impact the conservation status of caribou herds across the territory.

In this regard, we propose that:

- a) Caribou core calving areas, post-calving areas, key access corridors, and fresh water crossings be designated as Protected Areas.
- b) Caribou sea ice crossings be designated as Special Management Areas, following further information on the nature of the timeframe of the prohibited activities.
- c) Caribou rutting areas and migration corridors be designated as Special Management Areas designed to monitor the cumulative effects of multiple projects on caribou herds and to highlight the identified value of caribou in these areas.

5) Migratory Bird Setbacks

Issue: How should the migratory bird setbacks in Table 2 be implemented?

We are in support of option 1 which would dictate that migratory bird setbacks in Table 2 should be implemented as conditions that project proposals must comply with. This option implies that NPC would determine if the setbacks are met during a conformity determination, rather than regulatory authorities. We support the rationale provided by Environment Canada for the need to have Special Management Area designations for the key bird habitat sites. Environment Canada has committed to providing detailed information on the species, life stages, vulnerability, and seasonality for each site to ensure mitigation measures can be applied efficiently. Conforming to these setbacks will provide greater protection to the nesting and vulnerable birds, ensuring undisturbed reproduction of these populations and continued opportunity for local communities to rely on the migratory birds as a food source.

In this regard, we propose that:

- a) Migratory bird setbacks become a condition of conformity in the NLUP.

6) Proposed National Park in the Bluenose Lake Area

Issue: Should the Bluenose Lake area be designated as a Protected Area in the NLUP?

We are in support of maintaining the Protected Area designation for the Bluenose Lake outlined in option 2, regardless of the status of the area for the creation of a national park. The ecological values for which the expansion of the Tuk Tuk Nogait National Park were initially intending to protect are still present in the area. The caribou habitat, the headwaters of rivers, and the coastal representation of this ecosystem are still significant values for which protection is warranted. Regardless of the process and the time required by Parks Canada to advance the creation of a park, we recommend that industrial development be prohibited in the area under the NLUP through the continued designation of a Protected Area. Prohibition of disruptive activities would ensure that in addition to important caribou habitat, headwaters of significant rivers are protected and that the coastal representation of the Tundra Hills Natural Region remains undamaged. Maintaining the Protected Area designation would allow the NLUP to effectively conserve an area that is of interest to the community as identified in the community consultations done by NPC (see Kugluktuk report Map 1 p.5).

In this regard, we propose that:

- a) NPC review the community consultation records and the priorities expressed by the community members to confirm that the area remains ecologically and culturally significant for them and that the community is supporting management to preserve the area.
- b) The designation of the Bluenose Lake Area remain a Protected Area.

7) Conservation Areas

Issue: Should Conservation Areas be designated as Protected Areas in the NLUP?

We are in support of option 3 that Conservation Areas maintain their Protected Area designation. Environment and Climate Change Canada clearly stated there are no Conservation Areas in Nunavut where designation as Protected Areas under the NLUP would impose prohibitions that exceed standards and protections provided by already in place regulations. Thus, there is no need for the NPC to consider

a new 'Conservation Area' designation, or to develop a list of prohibited uses that are consistent with previous regulations.

In this regard, we propose that:

- a) Conservation Areas remains with the Protected Area designation.

13) IQ Incorporation including Community Priorities and Values / Areas of Interest

Issue: How should the DNLUP reflect community priorities and values and community areas of interest?

We support a combination of all four options proposed to ensure that community priorities and values and Community Areas of Interest be meaningfully incorporated in the NLUP. During discussions at all of the technical meetings, all parties agreed on the importance for the NLUP to reflect values and priorities of Nunavummiut. We support the designation of Community Areas of Interest as Protected Areas when the communities have express concerns for these specific areas and are in agreement with the appropriate restrictions. Since the previous iteration of the NLUP was significantly different than the version the community consultations were conducted with, a detailed rationale on how the community consultations were incorporated in the latest and forthcoming drafts of the NLUP is essential. The interventions from various local and regional organizations such as the Hamlets, HTOs and the Regional Wildlife Boards confirmed that many areas of interest do not seem to have been properly transferred from the consultation reports into the NLUP. We propose that the NPC review the consultation records and ensure that community voices are meaningfully incorporated to the planning process and that all Community Areas of Interest appear in the new iteration of the NLUP. This will likely result in the addition of several Community Areas of Interest and whether the Protected Area or Special Management Area designation would be more appropriate will depend on the community values and priorities. We agree with the opinions expressed during the third technical meeting that additional definitions for IQ and Inuit values would benefit the NLUP to provide proper context for the land use designations in the plan.

In this regard, we propose that:

- a) NPC reviews the consultation reports from all communities and includes additional Community Areas of Interest as Protected Areas or Special Management Areas.
- b) NPC evaluate the community values and priorities for the identified Community Areas of Interest and includes specific land use conditions.
- c) NPC includes better definitions for IQ and statements on Inuit values in the DNLUP. Also includes in the O&R document a section detailing how past consultations have contributed to the DNLUP, especially Table 1, and Schedules A and B.

15) High Mineral Potential

Issue: Should areas of high mineral potential be designated as Mixed Use?

We are in support of option 2, which would remove the prohibitions against conservation areas and tourist facilities in areas designated as high mineral potential and replace it with a Mixed Use designation. We do not see any benefit afforded through prohibiting conservation areas or tourist facilities, and no arguments were put forward by participants at the latest technical meeting in this regard. Assigning a Mixed Use designation does not change the land use options for these areas, as they remain open to development subject to regulatory approval. While we recognize the desire stated by other parties to advertise to industry that Nunavut is available for development, designating these areas as Mixed Use avails the same geographic extent of land for development without conformity issues from the NPC.

In this regard, we propose that:

- a) The Special Management Areas designated as High Mineral Potential be designated as Mixed Use.

16) Linear Infrastructure Corridors (Terrestrial)

Issue: What is the best approach for planning for transportation and other terrestrial linear infrastructure corridors in Nunavut?

We are in partial support of option 1, which would maintain the approach where Transportation Infrastructure is considered to conform to the requirements of the NLUP in all areas except where they are explicitly prohibited. Recognizing that winter roads and winter skid tracks are permitted in all designations, subject to other licenses, permits, and regulations, we propose that all other forms of linear infrastructure be prohibited in Protected Areas and certain Special Management Areas based on their identified values. Of particular note is the need to prohibit all weather roads in caribou calving and post-calving grounds. Two roads have been submitted to NIRB while no land use plan was in place (Izok and Sabina), which will be subject to the grandfathering policies of NPC. All additional linear infrastructure corridors should be subject to the NLUP conformity process. Thus, it is our view that the next draft of the NLUP should not include proposed linear infrastructure corridors, or hypothetical linear infrastructure corridors on Schedule A. The inclusion of potential linear infrastructure corridors on schedule A is confusing, and is not justified as Schedule A does not include other forms of potential development, such as mining sites and oil and gas leases.

In this regard, we propose that:

- a) All linear infrastructure be prohibited in Protected Areas and appropriate Special Management Areas based on their identified values.
- b) Potential and unconfirmed linear infrastructure corridors be removed from Schedule A, and placed in an Appendix to the NLUP if necessary.

17) Linear Infrastructure Corridors (Marine)

Issue: What is the best approach for planning for transportation and other marine corridors in Nunavut?

We are in partial support of option 2 which suggests to apply some restrictions on icebreaking in areas of community travel routes and caribou sea ice crossings, subject to safe navigation. However, WWF recommends that the approach for planning transportation and other marine use in the NLUP be the same as the approach suggested above for land based activity, which would mean marine uses are considered to conform with the plan unless they are explicitly prohibited. We believe that the efforts to identify the best routing for vessel is extensive work and does not fall under NPC's mandate. On the other hand, various processes identified ecologically and culturally significant marine areas and the NLUP should incorporate this information in the planning of marine uses.

We believe that the planning for transportation and other marine uses in Nunavut must abide to the precautionary principle and recommend that Protected Area designations be applied to areas of particular ecological value that are vulnerable to disturbance. Consequently, since a Canadian Science Advisory Secretariat was held to provide scientific advice and identify Ecologically and Biologically Significant Areas (EBSAs) and several areas were established as priority areas, the NLUP should apply appropriate protection from activities that are suspected to be harmful to these environments. Although Section 2.1.5 acknowledges the importance of these marine ecosystems, the management options applied (generally Mixed Used designation in the current draft) do not protect these marine areas from industrial activities and potential risks in a manner that would ensure sustainable ecosystems and prioritize community values. Inuit have relied on the marine environment for food, clothing, and cultural needs for millennia, thus making healthy marine habitats a vital part of Nunavummiut livelihood. We thus recommend that oil and gas exploration, commercial fisheries and icebreaking be prohibited in the EBSAs, polynyas, and in the caribou sea-ice crossings.

Industrial shipping in the Arctic is set to grow at a rapid pace and represents the most efficient means for transporting goods to northern destinations. Economic development is urgently needed in Nunavut communities, with many exhibiting amongst the highest poverty level in the country. However these opportunities do not come without risks such as oil and contaminant spills, noise and traffic disturbance of wildlife, or the introduction of invasive species. These risks are simply inherent to shipping and are exacerbated in Arctic due to weather conditions, logistic challenges, and vulnerability of the marine life. Ecosystem-based management and sound shipping planning is essential to ensuring the sustainability of economic development, to reduce the risk of industrial practices, to conserve the ecosystems services of significant habitats in the future, and to safeguard the wellbeing of northern communities.

Local organizations and community members are highly aware of the benefits of industrial shipping, but they are also the first to experience the negative impacts and to shoulder the risks. Various intervenors have noted in the consultation process that the impacts from current shipping levels have reached their level of acceptability in some communities. We recommend that NPC accounts for the evidence brought forward by the scientific community and the resource users in the Nunavut Settlement Area by restricting future shipping based project proposals in the most vulnerable marine areas of Nunavut through the establishment of Protected Areas that prohibit incompatible uses. Many of these areas are identified both by science and IQ, and management options can be applied to preserve the ecological and cultural values of the areas without compromising economic development and safe navigation. Seasonal restrictions, setbacks, anchoring restrictions, icebreaking restrictions and avoidance areas are measures that should be applied in the NLUP to ensure industrial activities are planned sustainably and account for ecological and cultural values of significant areas. New projects being proposed to NPC will have to conform to the restrictions imposed in the new plan. The imposition of new restrictions will not necessitate any new regulation or implementation support from responsible

authorities such as Transport Canada and Canadian Coast Guard because the prohibited activities will simply not be allowed to proceed if they need to be approved by NPC (subject to a ministerial exemption). The establishment of Protected Areas that prohibit shipping activities will have no jurisdiction over current shipping practices, community resupply, coast guard activities, or safe navigation.

Overlooking the importance of vulnerable marine areas and not assigning adequate protection measures would be a major flaw in planning the use of land and sea in Nunavut. We look forward to broader discussions on uses of significant marine areas that have high ecological value, but are also highly important to communities, for the purpose of finding the balance between economic development and conservation in the marine portion of the Nunavut Settlement Area.

In this regard, we propose that:

- a) Oil and gas exploration, commercial fisheries and icebreaking be prohibited in EBSAs, polynyas, and caribou sea-ice crossings.
- b) Protected Areas and appropriate Special Management Areas be put in place to restrict activities based on their identified values.
- c) Linear infrastructure corridors be removed from Schedule A, and placed in an Appendix to the NLUP if necessary.
- d) Once the ecological and culturally significant areas are properly identified and designated as Protected Areas or Special Management areas, the remaining marine habitats be designated as Mixed Use.

18) Existing Rights

Issue: Should projects with existing rights be required to conform to the land use plan if there is a significant modification to the project, including for the advancement from mineral exploration to mine development?

We are not in support of the options outlined in the Potential Refinements document. While we acknowledge and thank the Government of Canada for their work in drafting their clarification document on their position, it is clear from the discussion at the third technical meeting that more discussion and consideration is needed on this topic. Of particular concern to WWF is the lack of clarity from the Government of Canada on the date at which they propose projects to be grandfathered and thus exempt from the NLUP. Both WWF and the Beverly and Qamanirjuaq Caribou Management Board submitted letters supporting the position of the KWB that a moratorium be implemented on issuing claims, licenses and permits in calving grounds in Nunavut. We are still awaiting a response from the Government of Canada in this regard.

We also note the position expressed by the KWB at the third technical meeting, that Inuit are not consulted in the issuance of exploration claims. Under the current Government of Canada proposal, these projects would be exempt from the NLUP, and thus their grandfathering would contradict the consultative nature of the plan. At the minimum, we propose that prospecting permits not be grandfathered to the mining stage, and thus prospecting permits not be exempt from the plan. These permits represent relatively small investment from proponents, cover the largest geographic areas, and

contribute the greatest uncertainty to the effectiveness of the plan. Also of great concern is the quantity of claims, licenses, and permits currently on caribou calving grounds in Nunavut. If areas set aside as Protected Areas for caribou conservation are developed to the mine stage with all of the auxiliary features required for mine functioning permitted, the process governing the NLUP will be undermined and the goals of the plan will be compromised.

Numerous parties have indicated they are seeking legal opinions on this issue. We look forward to continued discussions on existing rights in an effort to find the balance between development and conservation in Nunavut.

In this regard, we propose that:

- a) The Government of Canada provide a response the planning partners on the date at which they propose projects to be grandfathered and thus exempt from the NLUP.
- b) The Government of Canada consider that prospecting permits not be grandfathered to the mining stage, and thus indicate that prospecting permits are not exempt from the plan.
- c) Further discussions take place on this issue.

20) Cumulative Impacts Referrals

Issue: Should the NLUP identify areas where there may be concerns regarding cumulative impacts?

We are in support of option 2, which would include considerations for referring projects proposals normally exempt from screening to the Nunavut Impact Review Board due to cumulative impacts concerns. Cumulative impacts are a growing concern in the North, where the combination of rapid environmental change and increased development pressures can interact with other factors to alter landscapes in ways that are not fully understood. By considering the cumulative impact concerns of projects that would normally be exempt from screening, the NLUP would become a more holistic tool that considers the wide variety of projects, activities, and sensitive ecosystems in Nunavut, and the interactions between various external factors. While more formal procedures are required to fully understand how the NPC envisions this process to occur, we are in support of the draft questions proposed by NPC staff. We suggest adding an additional question with the wording, "Does the project proposal occur in an area of community interest or an important harvest area for communities?" This would ensure that community values concerning wildlife and the ecosystem are considered in cumulative impact reviews.