

Document, Section and/or page #	Geographic Location / ID# (if applicable)	Comment
Section 3.1.1.3	National Marine Conservation Areas – Lancaster Sound	Lancaster Sound is a critical marine transportation corridor in support of development in Nunavut. Although it is recognized that shipping can be permitted within a NMCA, the NWT & Nunavut Chamber of Mines (“the Chamber”) seeks assurance or clarification that the identification of sensitive marine features in Lancaster Sound would not preclude these critical activities.
Section 3.1.2.2	Migratory Bird Sanctuaries	Environment Canada’s focus on identifying almost all Key Migratory Bird Habitat Sites as “Highly Risk Intolerant” is extreme. If the DNLUP incorporates these designators, many habitat sites will be given the same standing as the Queen Maud Bird Sanctuary, discouraging exploration and alienating areas where exploration already has occurred without incident in the past.
Section 4.1.1.1	Hiukitak River	The Kitikmeot Inuit Association is developing plans to create a conservation area in and around Hiukitak River south west of Boston. The Chamber supports this initiative.
Section 4.2.1	Transportation Infrastructure	<p>Transportation Infrastructure is a critical need of industry in developing projects throughout Nunavut at remote locations. The Chamber supports the establishment of transportation corridors in Nunavut to add certainty to move forward plans to construct roads and rail links that will add to the economic feasibility of mining projects in the territory. A number of transportation corridors have already been identified in the DNLUP. However, a transportation corridor in the Kitikmeot has not.</p> <p>The Chamber urges the NPC to consider establishing a transportation corridor in the DNLUP that will allow the orderly and sustainable development of the northern portion of the Slave Geological Province. At least 3 proposed corridor routes are known and deserve the consideration of the NPC: BIPR; MMG Izok Corridor Road route and; the Hope Bay Phase II Road route.</p> <p>The Chamber recommends that the NPC include the transportation corridors currently proposed by various proponents and refer them as “potential transportation corridors” in the plan. Also, the Chamber would like to see other important infrastructure elements identified in the plan, including proposed or potential port sites, ice roads and shipping routes.</p>
Section 5.1	Diversified Economic Development	<p>There is an emphasis in the DNLUP on economic opportunities, but there is no direct linkage between this favourable outcome and the economic development required to generate those opportunities: This should be clarified in the text.</p> <p>Care must be taken in how “balanced economic development” is defined and expressed. It is imperative that the DNLUP be clear and unequivocal in expressing the criticality of the mining industry to the present and future wellbeing of Nunavut’s regions. Designations must reflect this. For example, in the category of Mixed Use, it is entirely appropriate to state that mining, land-user access to carving-stone deposits, and conduct of tourism/outfitting, fisheries, and cottage industries can and do coexist successfully in the same area.</p>



		<p>The Plan should not encourage a fear of development. In the cases where ecological values are legitimately sensitive, the Chamber would like the NPC to opt for no permanent protection of conservation areas in favour of 5-year protection. The NPC could revisit every 5 years with the iteration of the Plan to see if wildlife have moved or if community priorities have changed. That way less land is locked up in permanent designations like national parks or national wildlife areas. Another option to consider is to expand the scope of the periodic review process (Section 7.6) to include consideration of land use designations. Adjusting the plan to respond to changes in caribou calving areas over time is a good example of a situation where this type of provision could be applied. However, this type of a provision would need to be guided by clear criteria defining when and how it could be applied to avoid undermining land use certainty.</p> <p>A simple mechanism that takes into account the intended dynamic nature of the DNLUP should be added, so that it is clear that protection is not a one-way street and that land-users have the option to change their minds on the basis of need and new information, including geoscience, and new technologies like hybrid air vehicles that could reduce the need for road access. Text is devoted to the potential for making land use more restrictive for an area but not for steps which can be taken to turn a Category 1 area (Protecting and Sustaining the Environment) into Category 5 (Mixed Use).</p>
Section 5.1.1	Mineral Exploration and Production	<p>Nunavut has a long documented history of mineral exploration and production. The evidence for this can be found in mineral assessment reports dating back to the mid-1900's (approximately 3500), mineral claim maps, and a large number of research reports produced by government geoscientists both of which date back to the early 1900's. Many of the numerous arctic expedition reports produced by explorers, including the 1576 Frobisher Expedition and the circa 1860 Hall Expedition, also include geological notes.</p> <p>Overall, the entire territory has the potential for mineral exploration and development which includes: aggregate resources; quarry resources; gemstones; precious metals; industrial metals; industrial minerals; energy minerals and; carving stone, which is precious to Nunavummiut, owned by Inuit, and is also considered a "mined" substance.</p> <p>The Chamber applauds the NPC in designating some areas of high mineral potential in the DNLUP for economic development. However, scrutiny of the areas designated thus far reveals they consist entirely of IOL Parcels. A number of areas in Nunavut of high mineral potential include Crown Lands, or straddle Inuit Owned and Crown Lands. To only designate IOL portions for development could lead to inconsistency and ambiguity in consideration of future conformity decisions for these areas. Whether a project in a known area of high mineral potential conforms to the DNLUP or not should not rest on land tenure, but rather on whether the project is a suitable and preferred land use given any other land values present.</p> <p>The Chamber encourages the NPC to work closely with government partners to include all areas of known high mineral potential in Nunavut under the "Encouraging Sustainable Economic Development" designation, provided that no other conflicting land use may exist for such lands. Mineral exploration and production is a critical component of the long term sustainability and economic independence of the territory. In addition to industry input, the Government of Nunavut's <i>Mineral Exploration and Mining Strategy "Parnautit"</i> should be considered when revising the DNLUP, as should input from</p>

		<p>geologists from Aboriginal Affairs and Development Canada, the Canada-Nunavut Geoscience Office, and the Government of Nunavut.</p> <p>New conservation polygons have been developed, but information/layers relating to mineral potential and existing mineral tenures are not currently reflected in the plan.</p> <p>A series of mineral potential maps should be included, similar to the maps that have been produced for commercial fisheries potential. Mineral potential maps for various mineral commodity groups could readily be produced using existing data.</p>
Section 6	Mixed Use	To encourage Mixed Use, the Plan should express an intention to incorporate corridors in the future for consolidating various industrial activities i.e. transportation, pipelines, communications, and utilities/power transmission lines.
Table 1, PSE-1, Area 51	Queen Maud Gulf Islands inside DND	This area is adjacent to a critical marine transportation corridor. The Chamber seeks clarification on whether such a future designation would impact marine shipping through the eastern approaches to the Northwest Passage.
Table 1, PSE-3, Area 46A	Lambert Channel	This area includes the entire portion of the western approaches to the Northwest Passage, and is therefore part of a critical marine transportation route. However, it appears that shipping is prohibited. We seek clarification on how such a future designation would impact marine shipping essential to the development of the mineral resources of the Kitikmeot region.
	Marine spill response	Discussion of marine spill response is absent from the Plan. Consideration of spill response infrastructure, such as staging areas, should be considered alongside discussions pertaining to marine developments (shipping lanes, port facilities, oil & gas developments), and where these developments may intersect with sensitive habitats and land uses. A suitable place within the Plan to discuss these areas would be in Table 1, Building Healthier Communities.
Table 1, ESED-1	Permitted Uses	The list of sites designated as ESED-1 is either incomplete or the definitions used therein are unclear. For example, “operational mines” are referred to in the text, and “existing mines” are listed in the table. Also, the list of properties at the “advanced stage” of exploration is incomplete or not current. A definition of “advanced stage” could be beneficial, as could a qualifying statement clarifying the date or conditions under which a property was considered to be advanced.
	Hope Bay Greenstone Belt	The 2 IOL (subsurface) portions are designated for economic development. However, the crown land portions in between and at the south end are designated Mixed Use. The Chamber would like to see the entire HBB designated for development, as the conservation values for the land that is not IOL at Hope Bay would not be relatively high.
	Qikiqtani Region	Several new conservation polygons identified in the Baffin region overlap with key mining interests.
Schedule “A”	Map - Land Use Designations	As it presently exists, the land use map in Schedule “A” of the DNLUP details a small number of mineral/mining Projects as “Encouraging Sustainable Economic Development”. This designation should be expanded greatly to reflect all current mineral exploration projects, the exploration history of the territory and geology of the territory. This information will delineate current prospective areas although new regions will undoubtedly be discovered in the future with more exploration and the development of new exploration technologies. The criteria used to designate these areas should also be clearly stated and consistent throughout the document.

General	Use of Canadian Spelling	The DNLUP uses American spellings. The Plan should utilize standard Canadian spellings [standard Canadian Press style is available when “Language” – “English – Canadian” is selected from the “Review” tab.]
General	Timing of Kitikmeot NPC Community Meetings	The timing for community meetings in the Kitikmeot is out of sync with the process and the direction that the NPC has provided to planning partners that stakeholder issues or conflicts should be addressed early in the process and that efforts should be made to resolve them prior to providing feedback to NPC. With Kitikmeot meetings occurring March 3 -25, 2014 NPC reporting on these meetings will not be available until sometime in April at the earliest. Given that the timeline for input to the commission is February 14, 2014 (and the final date for written submissions is April) this process is not aligned to allow parties that may have conflicting land use interests in the Kitikmeot the time they would need after the community meetings to discuss/resolve issues in advance of submissions to NPC. A timeline extension should be provided to accommodate this important part of the process.
General	Key Points	To make the DNLUP user-friendly and immediately understandable to all audiences, key points or concepts should be showcased in text e.g. as boldface take-away messages, text-boxes, bullet-points and similar. (Example of a “key point” is Para. #2, Pg. 31, Sect. 5.1.1, on the importance of mining and the NPC’s commitment to support the sector.)
General	Designation Codes	Designation codes are problematic and are difficult to remember – the reader is constantly flipping back and forth. The problem will be compounded when the Plan is translated into various languages. We suggest replacing the acronyms for the 5 planning categories with numerals – 1 (for Protecting and Sustaining the Environment) through 5 (Mixed Use).
General	Map Colour Coding	Colour coding is confusing and appears to overlap, e.g., green and orange both relate to protection, and green also is used to designate Mixed Use. Mining and oil & gas areas all have the same blue colour. Colours should be more clearly differentiated by tone or shade. Hatching or patterning could assist clarity during production in black and white.