



Mr. Percy Kabloona, Acting Chair
Nunavut Planning Commission
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Dear Mr. Kabloona:

**Draft Nunavut Land Use Plan -
Protecting Calving and Post-calving Caribou Habitat**

The Department of Environment and Natural Resources (ENR) commends you on the completion of the draft Nunavut Land Use Plan (NLUP). ENR has reviewed the draft plan and has comments related to the protection of caribou habitat.

Many of the barren-ground caribou herds in Nunavut are shared with the Northwest Territories (NWT). Management of these herds should also be shared, particularly as some of these transboundary herds are in decline or stable but at low numbers. In the draft NLUP, caribou habitat falls within the Mixed Use Designation (see Recommendations PSE-R2 and PSE-R3). Based on our understanding, this means that while proponents must consider impacts on caribou calving habitat, post-calving habitat, migration routes, and sea ice crossings, these areas are not protected from human disturbance. ENR is also concerned that recommendations in the draft NLUP do not ensure adequate mitigation of individual project effects or the cumulative effects of multiple developments on caribou and caribou habitat.

ENR is particularly concerned that recommendations in the draft NLUP will not ensure protection of caribou when they are most vulnerable to disturbance. For example, demands on lactating cows are high during calving and post-calving periods so disturbance during this time will limit the ability of cows to feed calves. Protection of calving and post-calving grounds would limit impacts of disturbance on our shared herds. ENR understands that many Hunters and Trappers Organizations (HTOs) and Regional Wildlife Boards in Nunavut have written letters in support of calving ground protection. The Beverly and Qamanirjuaq Caribou Management Board (BQCMB) has long held the position that the calving grounds and post-calving habitat of these two herds should be protected for the longterm. Protection of caribou calving grounds was also recommended by participants at the 2007 Northwest Territories Barren Ground Caribou Summit as one of the highest priorities for management.

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ENR encourages the Nunavut Planning Commission (NPC) to reconsider its approach to caribou habitat protection in the draft NLUP. One method of protection could be timing restrictions on industrial activity to exclude activity during the critical calving and post-calving periods. Another approach could be to set cumulative effects thresholds for land disturbance in these very important habitats. NPC could also consider re-instating and updating the Caribou Protection Measures that would govern industrial activity based on where the caribou are, and could give special recognition and protection to traditional water crossings.

ENR is facilitating the development of a range plan to guide land use decisions made by NWT and Nunavut management authorities on the historic range of the Bathurst barren-ground caribou herd. The range plan will recommend approaches to monitor cumulative land disturbance and identify when action should be taken in the form of mitigation, best practices, reclamation and/or suspension of certain activities. This is a collaborative process that the Government of Nunavut (GN) and other organizations in Nunavut have been asked to participate in. NPC is encouraged to refer to the guidance in the range plan in future revisions of the draft NLUP or as operational guidance for cumulative effects referrals in the Bathurst range.

Thank you for the opportunity to express our views. We are available at your request for any follow up discussions on these issues.

Sincerely,



Ernie Campbell
Deputy Minister

c. Distribution List

Distribution List

Honourable Johnny Mike, Minister of Environment, Government of Nunavut

Honourable George Kuksuk, Minister of Economic Development and Transportation, Government of Nunavut

Honourable J. Michael Miltenberger, Minister of Environment and Natural Resources, Government of the Northwest Territories

Mr. Drikus Gissing, Wildlife Director, GN-DOE

Ms. Lynda Yonge, Director of Wildlife, GNWT-ENR

Mr. Mitch Campbell, Kivalliq Regional Biologist, GN-DOE

Ms. Elizabeth Copland, Chair, Nunavut Impact Review Board

Mr. Ben Kovic, Chair, Nunavut Wildlife Management Board

Mr. Gabriel Nirlungayuk, Wildlife Manager, Nunavut Tunngavik Inc.

Mr. David Ningeongan, President, Kivalliq Inuit Association

Mr. Charlie Evalik, President, Kitikmeot Inuit Association

Mr. Ross Tatty, Chair, Kivalliq Wildlife Board

Mr. Attima Hadlari, Chair, Kitikmeot Regional Wildlife Board

Mr. James Qillaq, Chair, Qikiqtaaluk Wildlife Board

Mr. Ian Gray, Regional Director General, AANDC Nunavut Regional Office

Mr. Jeff Mercer, Manager of Land Administration, AANDC Nunavut Regional Office

Mr. Alex Ishalook, BQCMB member (Kivalliq Wildlife Board) and Chair, Arviat HTO

Mr. Stanley Adjuk, BQCMB member (Kivalliq Wildlife Board) and Chair, Whale Cove HTO

Mr. Earl Evans, Chair, Beverly and Qamanirjuaq Caribou Management Board