

NUNAVUT PLANNING COMMISSION  
PUBLIC HEARING ON THE 2016 DRAFT NUNAVUT LAND USE PLAN

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ATHABASCA DENESULINE COMMUNITIES OF  
BLACK LAKE, FOND DU LAC AND HATCHET LAKE DENESULINE FIRST NATIONS

PRE-HEARING WRITTEN SUBMISSIONS

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ATHABASCA DENESULINE  
Submission for the Public Hearing on the 2016 Draft Nunavut Land Use Plan

1/13/2017

## **1 Background and Objectives**

The Athabasca Denesuline (AD) consist of the communities of Fond du Lac, Black Lake and Hatchet Lake Denesuline First Nations. Although the communities are located in northern Saskatchewan, we are active land users of our traditional territories in the Northwest Territories and the south-western portion of Nunavut. The AD territory parallels the range of the caribou herds (Qamanirjuaq, Beverly/Ahiak and Bathurst) that our people have relied on for more than 8,000 years. Hunting, trapping, fishing and other land-based and cultural activities are actively pursued.

For these reasons, the AD have a great interest in the protection of the caribou herds. Caribou are the lifeblood of the north, and the health, culture and sustenance of our communities depend on them. The Traditional Ecological Knowledge (TEK) our Elders and knowledge-holders share is an invaluable resource upon which we draw and formulate our responses to proposals. It is with this powerful information that we provide this submission for consideration.

The AD have been involved with reviewing and commenting on the Nunavut Land Use Plan since we have been included in the process. We hope that the NPC will review all documentation, petitions and maps that were submitted prior to this document. This is a concise document that highlights a few of the important factors for the AD. We look forward to presenting at the public Final Hearing, in order to ensure that our concerns have been understood and addressed.

## **2 General Comments and Recommendations**

N/A

## **3 Specific Comments and Recommendations**

### **3.1 PROTECTION OF CALVING GROUNDS**

#### **3.1.1 Reference in DNLUP**

2.2 Caribou, page 27 Schedule A Table 1

#### **3.1.2 Comment**

The AD strongly agree with the NLUP approach to protect core caribou calving areas, key access corridors and post-calving areas through an assigned Protected Area Land Use Designation that prohibits incompatible uses. Including all areas having high mineral potential.

### 3.1.3 Recommendation(s)

The AD strongly urge the NPC to keep the Protected Area Land Use Designation that prohibits incompatible uses, including all areas having high mineral potential.

### 3.1.4 Rationale

The AD are very concerned about the health and well-being of caribou populations that migrate into our territory and support our communities. However, by opening up high mineral potential areas within calving grounds to development, they would not be adequately protected, nor would the interests of communities that depend on caribou populations for culture, health and sustenance. As the NPC has heard time and time again from our communities, a mine project and a calving ground, which is a sacred area, cannot co-exist no matter what mitigation measures are in place. The AD Elders tell us through traditional knowledge and first hand experience that any activity that causes stress, or results in a change of usual behaviour and/or diversion of the migratory path of the caribou, can impact on the health and condition of these animals. This subsequently impacts on the AD communities that rely on these caribou for sustenance. Industrial activity and development is the first and foremost activity that causes this type of impact.

We are relieved that the NPC have taken the position to protect the calving grounds, key access corridors and post-calving areas.

## 3.2 CARIBOU FRESHWATER CROSSINGS

### 3.2.1 Reference

Section 2.2.1.4

### 3.2.2 Comment

The AD are supportive of the 20 km buffer around key caribou water crossings.

### 3.2.3 Recommendation

We urge the NPC to keep this 20 km water crossing buffer in the Final NLUP.

### 3.2.4 Rationale

Water crossings are key in the regular movement of caribou across the range. It is imperative that these water crossings be unencumbered to facilitate the migration of the herds. The AD depend on the regular migration of the herd to reach their winter range, enabling us to practice our subsistence harvest and cultural activities. Because of the sensitivity of caribou, 20 km is the minimum distance buffer required to enable no impact crossing.

## 3.3 ATHABASCA DENESULINE NEGOTIATIONS

### 3.3.1 Reference

Schedule A

### 3.3.2 Comment

The AD have identified lands withdrawn in order to settle the Benoanie litigation. These lands must remain designated as multi-use in order to facilitate the resolution of this land claim settlement.

### 3.3.3 Recommendation and Rationale

Although we stand beside our statement in 3.1.4 and 3.2.4 regarding the importance of protecting key caribou habitat, the AD are in agreement with the removal of the protected area designation on the Interim Land Withdrawal lands. There remains 5 parcels designated as Protected Area, in the south-western portion of the Kivalliq region, due to them being either part of the calving area, post-calving area and/or caribou freshwater crossing. The designation of these parcels would complicate the negotiation process significantly. The NPC have agreed to remove this designation on these 5 parcels. We would like to stress the importance of doing this for the Final NLUP.

## 3.4 CUMULATIVE IMPACTS

### 3.4.1 Reference

Section 6.3.2

### 3.4.2 Comment

The AD are concerned about the lack of clarity on the role the NLUP will have on cumulative impacts. The NLUP states that “the NPC may develop policies and procedures to determine the likelihood and severity of Cumulative Impacts...”

### 3.4.3 Recommendations

The AD recommends stronger wording be in place to clarify the role of the NPC. For example, “The NPC will develop policies and procedures, within 6 months (or other suitable timeframe), to determine the likelihood and severity of Cumulative Impacts...”.

### 3.4.4 Rationale

Cumulative impacts are and will become a major issue impacting on the health and well-being of caribou populations. The majority of the NSA is designated Multi Use, which opens the door to developments which positively impact on the economy of Nunavut, but can lead to much damage to the environment if not monitored. Development can lead to numerous roads, infrastructure (especially linear), buildings, aircraft, exploration, and human presence in all corners of the territory. It is our belief, based on discussions with our Elders, that cumulative impacts has been the main cause of the decline of the Bathurst Caribou herd in recent years. Multiple mines, roads and activity are clustered near calving grounds and along key migration routes. This can not be allowed to happen again. The NLUP should address this topic more fully, and the role of the NPC needs to be strengthened.