



November 29, 2018

Mr. Andrew Nakashuk  
Chair, Nunavut Planning Commission  
P.O. Box 1797  
Iqaluit, Nunavut X0A 0H0  
By email to: [anakashuk@nunavut.ca](mailto:anakashuk@nunavut.ca)

**RE: Re-opening of Written Submissions for the 2016 Draft Nunavut Land Use Plan**

Dear Mr. Chair:

With regards to the Nunavut Planning Commission's (NPC) re-opening of the record for comments on the Draft Nunavut Land Use Plan (DNLUP), Agnico Eagle Mines would like to re-emphasize its position on the DNLUP.

We continue to stand by our January 13, 2017 submission and we appreciate the opportunity to share the following additional comments:

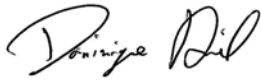
- We feel the re-opening of the record should not be focused on the outcome but rather on the process of consultation and engagement with all stakeholders. The proposed 2016 DNLUP affects rights, privileges or interests thereby owing a duty of procedural fairness to the parties negatively impacted by it. Agnico Eagle is concerned that the DNLUP does not reflect fairly the input provided from all stakeholders, thus leaving the impression the process has been misaligned and not transparent. We hope that the 2016 DNLUP not be advanced as currently constructed, and that a land use plan be developed in a timely manner to adequately balance economic, environmental and social priorities of Nunavummiut, as outlined in the Nunavut Land Claim Agreement (NLCA), Article 11.2.1. Agnico Eagle supports the following recommendation submitted to NPC by the three signatories in the June 21, 2018 letter: *"...significant revisions to the 2016 draft plan are required and it would be counter-productive to hold further hearings on this draft. Instead consultations should inform a redrafted plan, which should then be subject to public hearings in all three regions."*
- The revised 2016 DNLUP added substantial changes around protection of caribou habitat. More specifically, areas previously designated Special Management Areas in the 2014 draft were changed to Protected Areas. Post-calving areas have now been added as a **"prohibited use"** instead of being recognized as **"Special Management Areas"**. Both the Government of Nunavut and Nunavut Tunngavik Incorporated were against establishing prohibited uses in the calving, post calving and caribou crossings areas.
- Blocking exploration and mining when there is no scientific link to the decline of caribou would unnecessarily compromise the development of other opportunities for Nunavut and Nunavummiut, while not necessarily contributing to better caribou population protection. As

a result, these proposed changes to the DNLUP could have a significant and long-term adverse impact on the future economic development of Nunavut.

- Agnico Eagle believes that with effective mitigation measures and monitoring programs, mineral exploration and development activities can co-exist with sustainable development in caribou calving ground, post-calving grounds and access corridors. It appears that no definitive and scientific link has been established between the current decline in caribou populations across the North and exploration or mining. It's our view that many of these zones lack the scientific and traditional knowledge evidence to make them Protected area and should be designated as Special Management areas.

In closing, Agnico Eagle view Nunavummiut, Inuit organizations, Institutions of Public Government established under the Nunavut Agreement, the territorial and federal governments as partners in making sure that Nunavut has a clear plan to ensure responsible mining, thus bringing much needed certainty and clarity. Although we have serious concerns about the 2016 DNLUP and the process to date, please be assured that Agnico Eagle engagement will continue as a partner in the creation of a comprehensive and durable land use plan that is good for Nunavut.

Sincerely,



Dominique Girard  
Vice-President, Nunavut Operations  
Agnico Eagle Mines Limited

Attachment.: Agnico Eagle Mines Submission on 2016 DNLUP – January 13, 2017

cc: Hon. Dominic LeBlanc, Minister of Intergovernmental Affairs, Northern Affairs and Internal Trade

Hon. Joe Savikataaq, Premier of Nunavut

Aluki Kotierk, President, Nunavut Tunngavik Inc.

Hon. David Akeeagok, Minister of Economic Development & Transportation

Hon. Dennis Patterson, Senator for Nunavut

Mr. Hunter Tootoo, Member of Parliament for Nunavut