



## Beverly and Qamanirjuaq Caribou Management Board

25 January 2019

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via email: [submissions@nunavut.ca](mailto:submissions@nunavut.ca)

### **Response to Written Submissions on 2016 Draft Nunavut Land Use Plan**

The following comments are provided on behalf of the Beverly and Qamanirjuaq Caribou Management Board (BQCMB), which as you know has been fully engaged in the land use planning process for Nunavut for many years. This is in response to your invitation to provide comments on the additional written submissions you received from various participants in November 2018 on the 2016 Draft Nunavut Land Use Plan (NLUP). Please consider these comments as supplemental to our previous submissions.

#### **Comments on recent recommendations about the planning process**

The BQCMB supports recommendations made by the signatories and others to continue community consultations, and in particular agrees that a draft NLUP should be presented to communities and discussed at in-person regional hearings. At a minimum, hearings must be held in the Kivalliq and Kitikmeot regions before a final plan is submitted for approval. We also support the GN's recommendation that the process allow for oral questions to be asked and answers to be provided during the hearings.

We note that the federal government has recommended that further detailed discussions are led by NPC on how to protect caribou calving grounds. The BQCMB requests that it be included in any such discussions.

Adequate funding must be provided to NPC by the Government of Canada to allow for detailed discussions on calving ground protection and for regional hearings.

#### **Response to recent comments made by participants**

The BQCMB would like to emphasize and indicate its support for the following points made by participants in their 2018 submissions.

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### ***The need for habitat protection and the role of the Nunavut Land Use Plan***

- *From Baker Lake HTO submission:*
  - “The final approved plan must protect important caribou habitat. . .”
- *From WWF-Canada submission:*
  - “. . .the NLUP is the ideal tool to steward critical habitat for barren-ground caribou given the adaptive nature of the plan, the direct engagement of Nunavummiut, and the scheduled plan reviews.”
  - “. . .one of the key factors in the successful recovery and sustainability of herds is intact critical habitat that is free from disturbance.”

### ***The connection between development on caribou habitat and declining caribou herds:***

- *From Government of Nunavut submission:*
  - “. . .there is empirical evidence suggesting that development has negatively affected the distribution, movements, habitat use, nutritional condition, reproduction, and survival of barren-ground caribou. . .”
  - “The lack of a direct linkage to population decline does not imply there are presently no demographic impacts from development. Instead this may reflect limitations on the ability or level of effort used to detect such impacts given resources and methodologies available for research in barren-ground caribou habitat and the complexities of caribou-environment-development interactions.”
  - “While the extent to which development activities have contributed to the declines in specific caribou herds is unknown, it is important that actions that could inhibit the recovery of caribou herds are minimized.”
- *From WWF-Canada submission:*
  - “. . .if the goal is sustainable and healthy herds of caribou, there is no justification for allowing industrial development on the calving grounds while so many herds approach population minimums.”
  - “. . .the federal and territorial governments should do more to promote industrial activity in the huge amount of land outside environmentally sensitive areas, instead of providing mineral permits and leases in areas such as caribou calving grounds. . .”

### ***Mobile Caribou Conservation Measures proposed by Kivalliq Inuit Association***

- *From NTI RIA Joint Submission - Addendum A:*
  - “. . .is a flexible, rules-based tool designed for exploration sites and land use permits to minimize and avoid effects on caribou when exposed to human disturbance. . .”
  - “Mobile Measures do not apply to larger development which go through Nunavut Impact Review Board’s rigorous environmental assessment process where collaborative monitoring and mitigation plans are developed”
  - “Mobile measures are designed to reduce or avoid sensory disturbance to caribou year-round”
  - “. . .do not serve to protect habitat”

### ***Mobile Caribou Protection Measures***

- *From Kangiqliniq/Rankin Inlet HTO submission:*
  - “Mobile protection does not protect habitat. . .”

- “. . .the HTO feels that the Government of Nunavut does not have the capacity to maintain and more importantly, enforce the implementation of mobile protection measures.”

***The role of Nunavut Impact Review Board (NIRB) in habitat protection:***

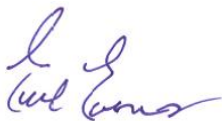
- *From Kangiqliniq/Rankin Inlet HTO Submission:*
  - NIRB “has made it clear on multiple screening decision reports that it is not within their mandate to protect caribou habitat.”
- *From WWF’s question to the GN concerning a NIRB submission to NPC (question #43 provided to participants in July 2018):*
  - “While impact assessment is designed to address potential impacts on a project-specific basis, land use planning is intended to address broader issues of conservation and development for various project types on a regional scale; parties **will not** be well-served if a NLUP avoids addressing required protection for caribou habitat and any associated restrictions on development in favour of continued deference to project-specific impact assessment by the NIRB.”

We would like to emphasize that calls for using mobile caribou protection measures and seasonal restrictions on activities to reduce disturbance to caribou as tools to protect calving grounds are inappropriate because **these measures will not protect habitat**. Use of these measures on caribou calving grounds would be inadequate to ensure protection of key habitat that is needed for the recovery and sustainability of declining herds, and for the maintenance of healthy herds.

We stand by the comments and recommendations we made in our January 2017 written submission to NPC on the 2016 Draft NLUP, as well as our comments to the March 2016 NPC technical meeting (Caribou Workshop). Please refer to our previous comments on protection of calving grounds for a more detailed description of the BQCMB’s perspective on this and related issues.

Thank you for this opportunity to respond to these written submissions. Please contact the BQCMB Contract Biologist, Leslie Wakelyn ([wakelyn@theedge.ca](mailto:wakelyn@theedge.ca)) or Executive Director Ross Thompson ([rossthompson@mymts.net](mailto:rossthompson@mymts.net)) if you have any questions about these comments.

Sincerely,



Earl Evans  
BQCMB Chair