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March 15, 2016

Kugluktuk

Bathurst Inlet
Kingaok

Bay Chimo
Umingmaktok

Premier Peter Taptuna
Government of Nunavut
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Email: Premier.Taptuna@gov.nu.ca

Re: New Government of Nunavut Position on Caribou Habitat

Cambridge Bay
Ikaluktutiak

Dear Mr. Premier:

Gjoa Haven
Okhoktok

The Government of Nunavut's (GN) current position on restriction rather than prohibitions on caribou habitat is more closely aligned with the perspectives of the Kitikmeot Inuit Association (KitIA). In a submission to the Nunavut Planning Commission (NPC) in June 2015, the KitIA supported the implementation of mobile caribou protection measures. The KitIA Board has been updated on this position several times since April 2015, and the Board has not expressed any concern with the approach.

Taloyoak

Kugaaruk

The GN's 2014 submission to the NPC's draft Nunavut Land Use Plan (NLUP), and their previous position on the protection of caribou habitat, had significant implications for land managers in Nunavut. As the Designated Inuit Organization for surface IOL (Article 21, Nunavut Land Claims Agreement (NLCA)) in the Kitikmeot, the KitIA was keenly aware that these proposed protected areas significantly impacted Inuit decision-making authority on a substantial amount of Inuit Owned Land. The draft NLUP "Core Calving and Post-Calving Protected Area" designation would prohibit development on 10.1% of surface IOLs, and 8.6% of subsurface IOLs in the Kitikmeot. These prohibitions also hinder Inuit economic activities and benefits, which are urgently needed in our region.

Additionally, in the Kitikmeot, both Inuit Qaujimajatuqangit and western science have documented several shifts in caribou calving grounds. The KitIA is concerned that if prohibitions are applied to current caribou calving areas, how will those areas be managed if the calving grounds shift again?

The NLCA has permitted Nunavut to establish rigorous review processes for development projects. The KitIA contributes significantly to the Nunavut Water Board, the Nunavut Impact Review Board (NIRB), and the NPC processes and



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we are very familiar with them. The NIRB also has a role in assessing cumulative impacts.

The KitIA believes that rigorous mitigation measures can be incorporated into the terms and conditions issued by these review boards to project proponents that can protect caribou habitat and still allow for projects to develop for Inuit economic wellbeing.

One substantial benefit to the GN's change in position was the GN Department of Environment's (DoE) openness during last week's Nunavut Planning Commission's Fourth Technical Meeting – Caribou Workshop. Our staff member reported that the DoE was open to: (1) disclosing in great detail the analyses used to develop the caribou calving grounds; (2) reassessing/analyzing the caribou calving areas in the Kitikmeot, including allowing KitIA staff to view and assess the Kitikmeot caribou data; (3) considering if regional approaches to caribou protection may be appropriate; (4) brainstorming and proposing new/updated mobile caribou protection measures; and (5) considering approaches to limit the extent of time that prohibitions are imposed on IOL. These are significant and welcome changes in the DoE's approach to the draft NLUP "Core Calving and Post-Calving Protected Area" designation.

Based on the updates to the KitIA Board since April 2015 and the discussions above, the Kitikmeot Inuit Association is in support of the Government of Nunavut's recent change in position regarding caribou habitat and restricted development in the Nunavut Land Use Plan. This new position is more closely aligned and supports KitIA's role as a landowner, and also represents a more responsible and shared approach to managing caribou herds and habitat now and into the future. Further, the KitIA would like to see continued dialogue and DoE openness on Kitikmeot caribou calving grounds as we work towards finalizing the NLUP.

Best regards,

Stanley Anablak
President
Kitikmeot Inuit Association

CC: Cathy Towtongie, President, NII
James Eetoolook – Vice President, NII
Pauloosie J. Akeeagok, President, QIA
David Ningeongan, President, KivIA
Tony Akoak – MLA Gjoa Haven
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KitIA Executive Committee and Board Members