



Qikiqtani Inuit Association

Andrew Nakashuk
A/Chair, Nunavut Planning Commission
P.O. Box 2101
Cambridge Bay, Nunavut X0B 0C0

March 24, 2016

Re: Qikiqtani Inuit Association's position on Caribou Protection in the Nunavut Land Use Plan.

Dear Mr. Nakashuk,

In light of a recent statement made by the Government of Nunavut (GN) at the Nunavut Planning Commission's (NPC's) fourth technical meeting held in Iqaluit March 7-10th, 2016, reconsidering their position on the protection of core caribou calving grounds, the Qikiqtani Inuit Association is writing to re-state our position supporting full protection for caribou in the Nunavut Land Use Plan.

At QIA's Annual General Meeting in October 2015 in Iqaluit, the QIA Board of Directors passed a resolution (attached to this letter) supporting caribou protection measures in the land use plan that provide full protection in calving grounds, including areas with high mineral potential as well as mobile protection measures in post-calving grounds. The QIA has not changed our position and have stated it verbally to the NPC and other parties at the last two technical meetings held in Iqaluit. Caribou is a culturally important keystone species therefore QIA continues to support full protection (area protection) in calving grounds and would like to see protection measures applied in all three regions.

The Government of Nunavut's (GN) representative at the NPC's technical meeting stated the GN no longer supports protected area status within the Draft Nunavut Land Use Plan (DNLUP) for core calving grounds and other sensitive caribou habitat, but a combination of seasonal restrictions and other measures. QIA is disappointed in the Government of Nunavut's reconsideration of their position regarding the protection of calving grounds as well as the fact that this decision was taken without consulting Inuit or regional planning partners.

To date the Government of Nunavut has not provided further details or rational regarding their revised position but noted that it will rely on the Nunavut Impact Review Board's (NIRB) environmental assessment (EA) process to determine if impacts can be mitigated on a case by case basis. Terms and conditions applied on a case by case basis through the EA review process do not allow for the certainty and clarity that proponents and regulators are looking for in a land use plan. Under NUPPA, the Nunavut Planning Commission's conformity determination is the first step in the application process and should provide clarity on designated areas for protection, special management, mixed use as well as Inuit values and priorities. Relying solely on the NIRB EA process misses a critical step in the regulatory

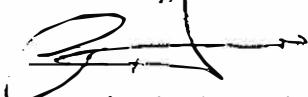
process, therefore QIA believes that area protection and prohibitions applied through the land use planning process are necessary to provide clarity on the protection of core calving grounds.

QIA continues to support area protection in calving grounds because of the significance of the species to Inuit but also because of the current lack of resources, capacity and research to successfully implement mobile or seasonal protection measures in core calving grounds. The successful implementation of mobile protection measures requires a high level of monitoring and the allocation of appropriate resources and capacity. At the NPC's fourth technical meeting, a GN representative stated that the GN does not have the resources to support mobile caribou protection measures and that the implementation of these measures would include an increase in collaring and aerial monitoring. Inuit have expressed concern with disturbances to caribou due to collaring and aerial surveys therefore any increase in these activities should be considered and rationalized within the protection measure. QIA recommends that the NPC request clear definitions of any protection measure to be applied in the Land Use Plan and that the definition address the ability to access or provide the required resources, the capacity to implement the protection measure and the level of disturbance involved in the practical application of the measure.

The Baffin region caribou population has seen a significant decline over time and QIA highlights the need to protect caribou all across Nunavut as they are a culturally important species for Inuit. QIA does not support the Government of Nunavut's recent change in position as it is not well defined, is not a science or IQ based decision and does not include details on the resources or capacity available to implement their revised position.

The QIA is willing to work with all organizations to ensure the protection of caribou in Nunavut and hopes that the Nunavut Planning Commission consider QIA's position as outlined above.

Sincerely,



Pauloosie Akeeagok
President
Qikiqtani Inuit Association

CC:

Cathy Towtongie, President, Nunavut Tunggavik Incorporated
Peter Taptuna, Premier, Government of Nunavut
David Ningeongan, President, Kivalliq Inuit Association
Stanley Anablak, President, Kitikmeot Inuit Association
Elizabeth Copland, Chair, Nunavut Impact Review Board
James Qillaq, President, Qikiqtaluk Wildlife Board
Stanley Adjuk, President, Kivalliq Wildlife Board
Simon Qingnaqtuq, President, Kitikmeot Regional Wildlife Board



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19 24, 2016

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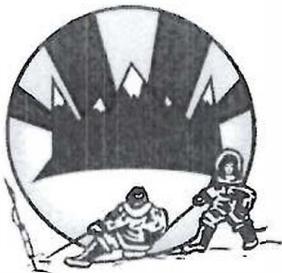
ابراج،

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Qikiqtani Inuit Association

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ANNUAL GENERAL MEETING IQALUIT, NUNAVUT October 6-8, 2015

QIA Position on Caribou Protection in Nunavut Land Use Plan RSA-15-10-31

WHEREAS The Nunavut Planning Commission, through the technical planning sessions, is seeking input from NTI and the RIA's for caribou protection measures to be considered within the draft Nunavut Land Use Plan.

AND WHEREAS; NTI and the three RIA's have differing opinions on the level of caribou protection wanted.

AND WHEREAS; The Baffin Region caribou population has seen a significant decline over time and QIA would like to see more aggressive protection measures in all three Regions to protect this culturally important keystone species by ensuring full protection of caribou calving grounds.

NOW THEREFORE BE IT RESOLVED THAT:

The QIA Annual General Meeting endorse caribou protection measures for Baffin Region including protection in calving grounds and mobile protection measures in post calving grounds.

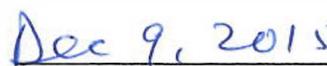
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DATE


Dec 9, 2015



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