



LP^éAb
Société Makivik
Makivik Corporation

May 10, 2016

Jonathan Savoy
Nunavut Planning Commission
PO Box 2101
Cambridge Bay, Nunavut
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RE: DNLUP Written Submissions - Designations in the zones of Equal Use and Occupancy

Dear Mr. Savoy:

As a follow up to our letter dated March 1st, 2016, we would again like to re-iterate that the current designation of Protected Areas in the zones of Equal Use and Occupancy may fundamentally prejudice the rights of Nunavik Inuit. It is moreover our opinion that the community consultations conducted in 2013 were insufficient, did not meet the consultative requirements of the NPC with regards to Nunavik Inuit and the level of community engagement was too low. We feel that there still remains some misunderstandings in the definition and limitations of Protected Areas in the communities visited. Furthermore, regarding the 2013 consultations, although there was an attempt to take Inukjuak representatives to the consultation in Ivujivik, the NPC did not hold direct community consultations in the communities of Inukjuak and Umiujaq; communities which are adjacent to Areas of Equal Use and Occupancy which are highly used by residents of the communities of Inukjuak and Umiujaq. With this in mind, we feel that the consultations for the DNLUP were inadequate and do not properly identify the communities' interests.

We understand that as of the end of March 2016, the NPC plans on conducting additional consultations in several regions including additional consultations with the Inuit of Nunavik. However, at this time we are unaware of the communities and the timelines that NPC has in mind for these consultations. These additional consultations with the Inuit of Nunavik could be an opportunity for the NPC to coordinate with the Nunavik Marine Region Planning Commission (NMRPC) as they are equally in the process of initiating the process to establish a Land Use Plan for the Nunavik Marine Region (NMR) including the Areas of Equal Use and Occupancy. This would ensure that there is some consistency between the land use plans in Nunavut and the adjacent plan in the NMR. It is our view that at minimum, there must be some cohesion between these adjacent areas and designations and limitations would serve both planning processes.

We trust that the NPC will understand our significant concerns and be amenable to a delay in designation of any protected area status for the Areas of Equal Use and Occupancy alone. If such a delay is not possible, we would ask that the areas of Equal Use and Occupancy be

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designated as a Special Management Area which will provide flexibility until such time where the relevant and concerned communities can be adequately consulted to determine what future uses will be permitted.

We understand NTI and QIA also share the same concerns as Makivik Corporation and trust that either a delay in designating the areas of Equal Use and Occupancy, or a change in designation to a Special Management Area would be agreeable so that the concerned communities are adequately consulted to determine a designation that will suit both the needs and future aspirations of the Nunavut and Nunavik Inuit.

We look forward to hearing the decision taken by NPC regarding potential plan refinements in the areas of Equal Use and Occupancy and look forward to discussing the additional requirements for consultation with Nunavik Inuit and trust that our position outlined above will be reflected in the release of the refined draft NLUP.



Adamie Delisle Alaku

Executive Vice-President, Resource Development Department

Cc: Rosanne D'Orazio, Director of Lands and Resources, QIA
Carson Gillis, Director, Department of Lands and Resources, NTI
Bert Dean, Assistant Director, Department of Wildlife and Environment, NTI
Sharon Ehaloak, Executive Director, NPC
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