

Document	Section	Page #	Issue	Rationale	Recommendation/Suggestion
Options and Recommendations	2	6	the NIRB is referred to as previously refusing coal exploration in the Fosheim peninsula	The NIRB did not refuse coal exploration but recommended to the Minister that as the potential adverse impacts of the proposal were so unacceptable, that the proposal should be modified or abandoned.	Suggest rewording the section to indicate that the NIRB makes recommendations but it is the Minister that makes the final decision on project proposal within the NSA.
Options and Recommendations	2	21	Justification for option assigned to Great Bear Lake Watershed identifies importance of area and reflects management direction for area in Sahtu region yet to be agreed upon and builds on existing planning policy framework. What would happen once the management direction for this area has been agreed upon?	Request clarification from NPC on how this designation would change if and when management direction or Sahtu land use plan comes into effect.	Suggest providing a discussion on how the designation would change based on when direction and/or plans are approved.
Options and Recommendations	2	22	The selection of Option 2 for climate change does appears inconsistent with NPC's objectives for climate change in the NLUP.	Option 2 encourages Minister to advise NIRB of potential issues or concerns regarding climate change to be considered during review of proposals; while NPC's objectives state: control and minimize greenhouse gas emissions, monitor climate change impact, encourage the development and adoption of adaptation strategies, and considers issues relating to changes in the landscapes due to climate change,	Suggest Options and Recommendations document be updated to include a discussion on how NPC would implement these objectives.
Options and Recommendations	3	24, 26, 27, 28, 29, 30	Are there any restricted uses/activities under the following Option: Assign a designation that permits tourism, recreation and research?	As some of the future conservation areas are potential or known significant areas for various cultural and environmental reasons, (eg., potential calving grounds), and there is limited data available on these areas, it may be prudent to identify limitations of land use for each conservation area.	To include a list of options or explanation/clarification on the types of land uses that may be restricted under this option.
Options and Recommendations	4	36-40	Communities that have not considered development within their watershed(s) get an automatic Option 1 - a designation that permits all uses.	could the NPC make a recommendation to municipalities that have not considered this in their municipal plans to think about it for future revisions?	Suggest that NPC consider providing a provision as part of the NLUP for municipalities that may not have accounted for development within their watershed(s) that these consider including this within municipal planning.
Options and Recommendations	4	41-42	Aerodromes - Option 1 have been assigned that permits all development.	Airports where federal government has jurisdiction - clarify whether NLUP applies to this type of land tenure.	Request clarification on Option 1 selection for Aerodromes.
Options and Recommendations	5	44-45	The Analysis and Recommendation for Mineral Exploration and Production only focussed on the 8 potential mines identified in the 2010 Nunavut Economic Outlook document. This document may be outdated.	The list of mines presented within the NLUP does not consider other exploration sites that are in the advanced exploration stage or currently undergoing review by the NIRB.	Suggest that section that describes "Considered information" on page 44 include mine and other major developments that are currently being assessed by the NIRB. This would include Sabina's Back River proposal and TMAC Resources Inc.'s Phase 2 Hope Bay Belt. Further, a description should be provided on how the NLUP would deal with future major projects that undergo assessment or reconsideration.

Document	Section	Page #	Issue	Rationale	Recommendation/Suggestion
Working Together	1.1.3	2	No reference provided for these documents	It would be useful if a reference is included on where the forms, directives and by-laws can be found.	The documents identified are separate documents from the NLUP and a reference should be provided on where they can be obtained.
Working Together	1.3.2	3	The statement that NPC is the authority responsible for reviewing all proposals in the NSA is not complete	Projects proposed within a park or a historic place must be submitted to the responsible authority for conformity (Section 164 of NuPPAA)	Suggest that this section be expanded to confirm that any project that is to be carried out within a National Park or historic place is not reviewed by the NPC for conformity against the NLUP but that it is the responsible authority (Parks Canada Agency) that determines conformity with the specific requirements of the park. Noted that these may still be subject to screening by the NIRB.
Working Together	1.3.2	3	This section does not clearly describe the conformity determination process	Reference to section 4.3 would make it clear without having to modify this section	Include reference to section 4.3 at end of the sentence "The process is referred to as the Conformity Determination process" (see Section 4.3).
Working Together	2.2.1	5	The number of factors were not defined	Factors should be included in this document or as a separate document	Provide the factors that would make implementation successful and suggest that this be provided in a separate document.
Working Together	2.2.1(a)	5	Clarification from NPC regarding the roles of each partner in the implementation of the NLUP	Not clear what the roles of each partner are with respect to the implementation of the NLUP	Suggest that the document identify the roles of each partner in the implementation of the NLUP. Potential that this could be discussed under section 3.
Working Together	2.2.1(d)	5	The point is not clear on how effective monitoring would occur and who the partners are.	Not all partners are involved in monitoring of projects and this should be clarified in this point. Further, would the partners be responsible for reporting to NPC on the ability of the NLUP to deal with land use issues in Nunavut?	Point needs to be clarified to indicate who the partners are expected to be, and how monitoring of the NLUP would be conducted. A strategy should be included on the ability of the NLUP to deal with land use issues in Nunavut. Potential for a separate guide to be created to explain or discuss further.
Working Together	2.2.1(e)	5	Not clear what is meant by commitment and who is supported?		Reword point to clarify the statement.
Working Together	3.2	6-7	Some of the descriptions of the institutions could be more detailed		Update NIRB section to be more descriptive.
Working Together	3.3	8	Incomplete text - definitions not given for KitIA or KivIA	Section is incomplete.	Add description of the two RIA's in 3.3.3.
Working Together	3.4	9	Missing Government of Canada organizations in the list	Consider including Natural Resources Canada (NRCan), Environment Canada (EC) and Canadian Coast Guard	Include a section for Natural Resources Canada (NRCan), Environment Canada (EC) and Canadian Coast Guard
Working Together	3.4.3-3.4.6	9	Incomplete text - no definitions for PC, TC, DFO or DND	Section is incomplete.	
Working Together	3.5	9	Missing Government of Nunavut organizations in the list	Consider including Culture & Heritage	Include a section for Culture and Heritage
Working Together	4.2.4	12	Acronym not defined; reference needed.	Acronym NUPPAA used in the document without either footnote reference or definition of the acronym.	Suggest providing reference and/or table of acronyms in the document. This could be provided at the end of the document as an appendix.
Working Together	4.3.10	14	Consider updating this section to be reflective of NuPPAA		A project is exempt from screening...set out in Schedule 12-1 of the NLCA and does not belong to a class of non-exempt works or activities prescribed by regulations
Working Together	4.3.11	14	clarification of term	This bullet uses 'board' to refer to the NIRB, however several boards are defined earlier in the document, and this point does not make clear which board is being referenced.	Replace the use of board with the appropriate board name. In this case, suggest replacing 'board' with NIRB
Working Together	4.4.3	15	condition of minor variance being considered is based on effects assessment criteria when a proposal has not yet received an effects assessment?	Current wording unclear.	suggest other criteria than "negative effects" for satisfying this condition such as "project would not interfere with" or "have unacceptable effects". Section 4.5.8 d) b) on page 17 may have better wording to be used "b) result in an incompatible or obnoxious land use when viewed in the context of surrounding uses or interests;"

Working Together	5.6.2	22	The NIRB does not have a mandate to monitor all projects and is not funded to do so. Requiring that planning partners have the capacity to monitor projects may prove problematic if it is not part of their individual mandate.	Point requests a commitment and capacity for the Planning Partners to monitor projects when it may not be in the individual organizations mandates to monitor all projects. In addition, it would be impossible to determine the commitment and capacity to which the NPC is referring due to the lack of definition of monitoring or the criteria which will be assessed as part of the function.	Suggest rewording this point to perhaps coordinate monitoring efforts.
Working Together	5.6.2	22	Second sentence is unclear about "reviewing project proposals" as it is NPC's responsibility alone to make the conformity determination.	This statement is unclear as it could make reference to the NIRB's Review Process under Part 5 or 6 of the NLCA, or the NPC's review of a proposal in order to make a conformity determination, two very different processes.	Clarify or reword the underlined part of the sentence for clarity: "Working together <u>in monitoring and reviewing project proposals</u> is critical to the success and effectiveness of the NLUP."
Working Together	none		Table of Contents	Document usability	Suggest providing table of contents for document

Document	Section	Page #	Issue	Rationale	Recommendation/Suggestion
Draft NLUP	Definitions	7	Definition of IQ is inconsistent with those of the NIRB and QIA	Would be helpful if all agencies work with the same definition if possible.	Suggest reconsidering the working definition.
Draft NLUP	Definitions	8	Screening definition is not complete	Screening definition needs to include "significant ecosystemic and socio-economic impact potential"	Suggest updating screening definition to read as follows: "means a process undertaken by the Nunavut Impact Review Board to determine if a Project Proposal has significant ecosystemic and socio-economic impact potential"
Draft NLUP	1	12	Not clear how data gaps will be addressed by the NLUP.	There is no clear discussion on how data gaps identified (caribou, muskox, etc.) will be addressed by the current NLUP or the NPC in the future.x?	The NLUP should include a discussion on how data gaps would be treated. Suggest adding a section to the NLUP.
DLUP	1.3.2	12	It is unclear whether consideration of the Athabasca Denusuline and the Manitoba Denesuline were included in the DLUP for the areas that their title claims overlap with the NSA.	Beneficial to mention whether and which Aboriginal groups with title claims that overlap with the NSA were involved in the land use planning process.	Identify whether and which other Aboriginal groups with title claims overlapping with the NSA were included in the land use planning process.
DLUP	1.3.2	12	The level of government involved in the draft of the NLUP is not stated.	It is unclear at first glance if this means the territorial and/or federal governments.	Recommend the NLUP is clear regarding the level of government being referenced.
Draft NLUP	1.3.4	14	Section 1.3.4 discusses application of the DNLUP - would be helpful to include clarification on projects within municipal boundaries in this particular section of the report.	No specific section of the DNLUP clearly outlines the management of developments within municipal boundaries. Unclear whether community maps in Appendix A are intended to assist with understanding some of the potential land use activities within municipal boundaries.	Request clarification regarding proposals within municipal boundaries the intended use of community maps in Appendix A. Municipal Boundaries do not appear to be discussed in Options and Recommendations document.
Draft NLUP	2	16	how were Polar Bears and other SARA listed species accounted for in the plan?	Not apparent that SARA listed species and their habitat requirements were addressed.	Habitat fragmentation may occur if areas of importance are permitted as areas where all uses are permitted. Request NPC clarify whether it considered these areas to be subject to other designations?
Draft NLUP	2	16	Appears to be missing discussion of marine shipping, muskox areas, polar bear habitat, protected marine areas, Species at Risk, areas of biological importance, Conservation Areas, areas of significance to Inuit, Areas of Interest, or areas adjacent to National and Territorial Parks	The NLUP should give consideration to marine shipping, muskox areas, polar bear habitat, protected marine areas, Species at Risk, areas of biological importance, Conservation Areas, areas of significance to Inuit, Areas of Interest, or areas adjacent to National and Territorial Parks. NLUP should also identify that these areas are part of the data gaps and would be looked at later.	Suggest that the list of areas and issues be expanded to include the items as listed and discuss how data gaps will be addressed.
Draft NLUP	2	17	No land use designation was assigned to caribou calving grounds	Rationale should be provided on why no PSE were assigned to caribou calving grounds	Suggest a discussion be included in the NLUP

Draft NLUP	2.1.2	17	land use designations seem to be ambiguous	The NLUP contains 'Permitted and Prohibited Maps' for each of the 5 land use designations that identify areas in the NSA where it is recommended that impacts to caribou calving grounds be considered in the assessment of project proposals (PSE-R2). NPC has identified areas of importance to be protected (e.g., the Fosheim Peninsula is designated as PSE-2: key bird habitat site); however, resulting land use designations may present ambiguity in their implementation as PSE-2 permitted uses include tourism, research and recreation and do not prohibit any specific uses or activities from being carried out.	While the DNLUP is helpful in identifying specific areas in the NSA of importance to be protected, request NPC provide clear guidance in establishing methods to protect such areas (e.g. by restricting certain activities) and clarify whether any activities will be prohibited where PSE-2 designations are provided.
Draft NLUP	2.1.2	17	This Section lists the general caribou calving period as occurring between May 15-July 15 but the DNLUP does not appear to place any restrictions on land use activities during this period.		Request that NPC clarify whether 'seasonal restrictions' were considered for activities located in regions designated as recommended caribou calving grounds (PSE-R2). Further, the Options and Recommendations Document (page 18) list an option to assign designation that provides seasonal restrictions (Caribou Protection Measures) but this option was not considered - request justification.
Draft NLUP	2	18	No information provided on the type of thresholds that would be used for cumulative impacts	Information should be provided on the thresholds that would be used. The Options and Recommendations document indicates that there are no agreed upon threshold. The development of thresholds for cumulative impacts is an essential component of the NLUP.	Suggest that NPC consider public engagement to develop thresholds for cumulative impacts.
Draft NLUP	2	18	No discussion provided on how cumulative impacts would be considered in land use planning, the steps that would be followed and when/how NPC would refer a project to the NIRB for screening on this basis.	The NLUP refers to cumulative impacts of a project as being an important component of managing land use in the NSA. Further discussion should be provided on how this would be considered as part of the NLUP. This section and the Options and Recommendation document do not describe how the NLUP would handle projects with potential cumulative impacts.	Recommend the NLUP or Options and Recommendations document provide a description of the consideration given to cumulative impacts as part of the conformity determination process.
Draft NLUP	2	18	Transboundary considerations do not include Heritage Rivers such as Thelon, Kazan and Coppermine (nominated) rivers.	These rivers would be would have designations as heritage rivers (Coppermine has been nominated) but it is also important to consider transboundary issues for these rivers.	Include designations for other areas that might be affected by transboundary issues.
Draft NLUP	3	20	The list of areas and issues identified by NPC is not complete and appears inconsistent with the Conservation Areas identified by Article 9 of the NLCA		Suggest document includes the other conservation areas as identified in Article 9 of the NLCA or provide a discussion on why these conservation areas are not being identified within the NLUP
Draft NLUP	3	20	The difference between National Parks awaiting Full Establishment and Proposed National Parks is unclear.		Suggest NPC provide clarification on the difference contemplated between the two types of parks either in the DNLUP or Options and Recommendations document.

Draft NLUP	3	21	What would happen when there is a land withdrawn for the Bluenose Lake Area? Will the land use designation change? What about the two other natural regions mentioned?	No discussion provided on when new parks are proposed and/or lands are withdrawn to be put in place as a Park	Suggest providing a discussion on future proposed parks and how they would be treated within the LUP
Draft NLUP	4	26	Encourage the NIRB, NWB, Inuit land managers and government regulators to identify and reduce impacts to humans and environmental health, especially community water sources, that may occur as a result of land use	this seems in contradiction to NPC's key component to building healthy communities. If this is important, it is the NIRB's recommendation that some protection be placed around communities waters if they haven't done so/communities should be advised to look at their water sources and make appropriate motions to ensure their water is protected.	suggest the NPC make a recommendation to municipalities that haven't accounted for this in their community plans to think about it for future revisions
Draft NLUP	6	32	Section 6 of the DNLUP discusses areas that can support a diverse mix of land uses to promote the well-being of communities; however in Table 1 where mixed use (MU) is defined, it states that 'all uses are permitted', which may be ambiguous where potentially conflicting activities might occur, where all uses being permitted.		Request the NPC discuss its approach to managing uses for this particular designation. Also request that mixed use designation be discussed within the Options and Recommendations document.
Draft NLUP	7.6	36	Will the periodic review include discussions with the NIRB?	By conducting Screenings and Reviews, the NIRB would be able to provide valuable information on the impacts of activities in the various planning zones.	To add a section in the Options and Recommendations document detailing how the Periodic Reviews will be conducted, which Parties will be asked to provide information and how the process to retrieve this information will be conducted.
Draft NLUP	7	Table 1	Not clear when sites are only defined to have permitted use.	The table identifies "permitted use" and for some sites "prohibited use". Further clarification required for sites that only have "permitted use" identified. Does this mean that any other use is not permitted by the LUP or will it be decided on a case by case basis? Need this to be identified in the table or in chapter 7.	Table needs some further clarification on sites that only have permitted use and describe how other uses would be treated under the NLUP.
Draft NLUP	7	Table 1, page 43	List of sites identified under ESED not complete	List does not include Back River that is currently being reviewed by the NIRB	Suggest NPC revise list in consultation with the NIRB to include up to date list of advanced exploration and reasonably foreseeable projects