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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

via email

February 14, 2014

Sharon Ehaloak, Executive Director
Nunavut Planning Commission
P.O. Box 2101 Cambridge Bay, NU X0B 0C0

Re: NWB's Submission Pertaining to NPC's Draft Nunavut Land Use Plan and Associated Documents

Dear Sharon:

Please find attached the Nunavut Water Board's (NWB or Board) comments and recommendations pertaining to the following documents, as per your request:

1. *A Guide to Engagement*
2. *Options and Recommendations*
3. *the DNLUP*

The NWB appreciates this opportunity to provide feedback on the above-referenced documents and to participate in aspects of the Nunavut Planning Commission's (the Commission) current consultative process to the extent that timelines, resources, and other factors allow.

I hope that the Commission will give due consideration to our submission in the next stage(s) of the land use planning process.

Respectfully,

Damien Côté
Executive Director
Nunavut Water Board

cc: Ryan Barry, Nunavut Impact Review board
Jim Noble, Nunavut Wildlife Management Board
Adrian Boyd, Nunavut Planning Commission

Attachments: NWB's Submission Pertaining to NPC's Draft Nunavut Land Use Plan and Associated Documents

Appendix A – Illustrative Examples of Nunavut's 65 WMAs incorporated with NPC's Recommendations and Designations for the DNLUP.

Appendix B – Nunavut Water Management Areas – Descriptions



Nunavut Water Board

February 14, 2014

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Introduction

The Nunavut Water Board (NWB or Board) is an Institution of Public Government (IPG) created under Article 13 of the *Nunavut Land Claims Agreement (NLCA)*. The NWB is responsible for the use, management, and regulation of inland waters or freshwaters in the territory of Nunavut. The Board is required, in carrying out its responsibilities, to consider any detrimental effects that potential use of waters or deposit of wastes could have on other water users and the freshwater receiving environment. This requirement corresponds with a key objective of the NWB's mandate to provide for the conservation and utilization of waters in Nunavut – except in national parks – in a manner that will provide optimum benefits for the residents of Nunavut in particular and all Canadians in general.

The effects of land use planning decisions in Nunavut are inherently important to the NWB's mandate, just as the effects of water management decisions in Nunavut are inherently important to the Nunavut Planning Commission's (the Commission) mandate. Section 36(1) of the *Nunavut Waters and Surface Rights Tribunal Act (NWSRTA)* (S.C. 2002, C.10) specifically requires that:

“The Board shall contribute fully to the development of land use plans so far as they concern waters in Nunavut, by providing recommendations to the Nunavut Planning Commission”.

Furthermore, section 13(4)(1) of the *NLCA* requires that:

“The NWB shall contribute fully to the development of land use plans as they concern water in the Nunavut Settlement Area by providing its recommendations to the NPC”.

Accordingly, at this critical juncture in developing Nunavut's first-ever territory-wide Draft Nunavut Land Use Plan (DNLUP), it is important that both the NWB and the Commission provide careful consideration as to how the DNLUP could affect the NWB's ability to fulfill its mandate for water management in Nunavut. This is an important point as many of the topics covered in the DNLUP require licensing by the NWB and/or may



affect the NWB's ability to issue licences for undertakings or activities proximal to certain potential exclusion zones or areas identified in the DNLUP. The following activities and/or undertakings as noted in the DNLUP either require direct licensing by the NWB or may indirectly affect the NWB's ability to issue licences for proximally located undertakings and activities:

- Scientific research camps, fuel caches;
- Water management and licensing on Canadian Heritage Rivers;
- Restoration and reclamation of facilities in cooperation with land owners;
- DEW Line Sites and reclamation/restoration of DEW Line Sites and the Northern Warning System;
- Establishing reclamation standards and criteria that include the assessment of human health and ecological risks;
- Water quality and quantity;
- Water sources;
- Community water and waste infrastructure;
- Dam and dykes where climate change and permafrost issues are a significant consideration in design;
- Camps for waste site clean ups;
- Linear developments (e.g. *pipelines, water crossings, all weather roads, dams/dykes, hydro developments, etc.*);
- Ice/winter roads;
- Airstrips;
- Emergency Response for all type of undertakings that use water and/or where there is waste disposal that may impact water;
- Waste management;
- Any development (e.g. *industrial, mineral, power, etc.*) requiring the use of water or disposal of waste; and
- Operational and administrative issues (e.g. *security, performance bonding, etc.*).

With these activities in mind, the Commission is respectfully reminded as it moves forward this year with the final stages of developing the DNLUP, that the respective mandates and discretion of regulatory agencies that may be affected by the Commission's issuance of policy direction to a specific regulatory agency cannot result in the fettering of that regulatory agency's decision-making authority or ability to fulfill its legislative

mandate. While the NWB recognizes that the intention of the Nunavut Land Use Plan (NLUP) is to guide short-term and long-term development, any decisions related to the NLUP that have the potential to affect the Commission's Planning Partners and regulators in this manner should directly involve the concerned parties.

The Commission should note that the NWB is currently, in cooperation with its partners, in the early stages of developing a water management strategy (the Strategy). As it is unlikely that the Strategy will be prepared in time to be included in the first iteration of the NLUP, it is important that the NLUP includes conditions and references to the Strategy that will facilitate its forthcoming deployment and associated interaction with the NLUP. The NWB has provided several specific recommendations that address this need in the Options and Recommendations section of this document.

Overall and as requested by the Commission, the NWB has provided feedback in the subsequent sections on the following three documents: (1) A guide to engagement, (2) Options and Recommendations document, and (3) the DNLUP.

1. A Guide to Engagement

The NWB believes that the consultative process the Commission has adopted and the associated timeline provided in the “*A guide to engagement*” (the Guide) document is problematic for a number reasons.

An initial issue is that the document is non-binding, which reduces the degree of certainty associated with the process. While the NWB recognizes that a binding guide might provide less flexibility on the part of the Commission, such a guide would provide planning partners and stakeholders with the clarity that is needed to properly plan for their respective contributions to the DNLUP.

Another issue is that the nature of the submissions required at different stages is not very clear. A more comprehensive description of the types of information and format the Commission is seeking in the Guide, and the significance of each respective submission in terms of the overall DNLUP process would serve as improvements to the Guide. Additionally, the Guide is also not clear as to what opportunities exist for the NWB to participate in the Commission’s consultative process.

The Commission has requested in the Guide that comments be received from all parties (February 14, 2014) prior to the anticipated date for completion of the Commission’s community consultations (March 2014). This consequently does not provide parties with the opportunity to review the draft community reports that are based on the results of those consultations, which are scheduled to be released *after* parties have had the opportunity to provide comments on the DNLUP (May 2014). Furthermore, it was evident at the Commission’s most recent workshop entitled “*Filling Gaps in the DNLUP*” held on September 17-19, 2013 (Workshop) that the approach of having parties comment on the ‘Options and Recommendations’ document rather than a revised DNLUP is confusing for some concerned parties. If the Commission is not willing to adjust the DNLUP review timeline to allow for the preparation and review of a revised DNLUP, then every effort should be made to provide parties with all relevant materials (e.g. *data, reports, plans, etc.*) well in-advance of deadlines and meetings among planning partners



and stakeholders, such as those between Government, Regional Inuit Associations, Nunavut Tunngavik Incorporated, and other concerned parties.

2. Options and Recommendations

The current iteration of the Commission's Options and Recommendations document (Options) may limit the NWB's ability to fulfill its mandate in several areas. There are both general issues and specific topics in the Options document that require the Commission's attention. In regards to general issues, the following modifications to the Options document should be contemplated by the Commission:

- A 'Table of Maps' should be added to the front-end of the document to assist users in navigating the substantial number of maps provided at the end of the document; and
- Consideration should be given to modifying the layout of the document so as to make it easier for reviewers to navigate. The current layout requires reviewers to scroll back and forth or view the document at about 75 percent its actual size to access the contents of each page.

From the NWB's perspective, there are also specific topics covered in the Options document that will require revision, as per the guidance provided here and subsequently during the NWB's participation in the Commission's consultative process. Specifically, the NWB has issues with the following areas of the Options document:

- Heritage Rivers (*Thelon, Kazan, and Soper Rivers*);
- Areas of Community Interest;
- Community Drinking Supplies;
- Land Remediation;
- Mineral Exploration and Production;
- Periodic Review; and
- Permitted or Prohibited Uses.

The NWB has provided guidance and/or comments for each respective topic in the subsequent sections.

2.1 Heritage Rivers

As noted in the Options document, the Canadian Heritage Rivers System was designed to promote, protect, and enhance Canada's river heritage, while ensuring that Canada's leading rivers are managed in a sustainable manner. The NWB's concern for the Commission's approach to land use planning for heritage rivers is that the Commission's recommended options may limit the NWB's ability to exercise its authority and mandated-role in water management and licensing on or proximal to Canadian Heritage Rivers. None of the Commission's recommended options appear to account for impacts that may occur to the Thelon, Kazan, or Soper River's tributaries, all of which may be affected by the licences the NWB issues. Accordingly, the NWB is seeking details regarding the inclusion of provisions for each respective recommended option that will allow the NWB to issue licences for undertakings that are proximal to the buffer zones or in watersheds affecting Heritage Rivers. Given the NWB's expertise, role, and high level of interest in the area of water management, the NWB recommends that the Commission provides a fourth option, wherein a designation is assigned that permits tourism, recreation, and research, while additionally requiring all project proposals that do not fit these categories to consult the Strategy or to consult the NWB until the Strategy is officially developed and implemented.

2.2 Areas of Community Interest

The Hiukitak River has been identified by the Kitikmeot Inuit Association (KIA) as a special area of interest to the people of Bathurst Inlet and Umingmaktok. The NWB is concerned that the process that led to the decision to select Option 1, is not sufficiently described or transparent in the Options document. Based on the information provided, it appears there were opposing interests between the KIA's Board Directive to close Inuit Owned Lands (IOL) parcels in the area to mineral exploration (2006) and Nunavut Tunngavik Inc.'s (NTI) insistence that there be no restrictions on development activity on IOL. This particular area also contains

historic caribou calving grounds and portion of the area is contained within the Queen Maud Sanctuary. This area was assigned a designation that permits all uses in order to be consistent with the direction provided by NTI. Given the comments from KIA and the value placed on wildlife sanctuaries elsewhere in the Options document (e.g. *Thelon Wildlife Sanctuary*), this approach may not necessarily be considered as “achieving a balance between the comments received from GoC, KIA, and NTI”, as stated in the Options document. Every effort should be made by the Commission to ensure that the decision-making process for the DNLUP is transparent and fair. Accordingly, details regarding how stakeholders input were weighted and the range of considerations that led to the final selection of each option should be elaborated on.

2.3 Community Drinking Supplies

The Options document includes land use designations and considerations for how project proponents should proceed when their activities occur within a watershed that encompasses a community’s water supply (referred to here as ‘source protection’). Overall, out of 26 source protection options considered by the Commission, 19 communities received designations that permit all uses (Option 1), wherein it is recommended to regulators and project proponents to consider their impacts on the area. At this time, the NWB does not hold sufficient data or information to provide the Commission with specific management actions that should be implemented in each respective community’s source protection area as part of the DNLUP. Until the NWB has had the opportunity to research the issue more thoroughly and develop an approach that is considered appropriate by all concerned parties, the NWB is limited in its capacity to advise the Commission. More comprehensive guidance and direction on the issue of source protection may be provided under the Strategy or directives issued by the NWB.

2.4 Land Remediation

The Options document recommends Option 3 for the Department of National Defence (DND) controlled Distant Early Warning line sites (DEW) and Option 1 for Aboriginal Affairs and Northern Development Canada (AANDC) remediation sites. Based on the authorizations issued by DND to respective project proponents, the



NWB has issued, in the past, a small number of licences for exploration and research undertakings and activities that depended on airstrips and camp infrastructure associated with DND DEW lines sites. Therefore, in the context of Option 3, the NWB seeks clarifications from the Commission with respect to if and how Option 3 will impact the NWB's ability to issue similar licences in the future. The same type of clarifications is requested for the Northern Warning System as well.

2.5 Mineral Exploration and Production

The Options document does not address how the DNLUP will be implemented with respect to existing water users and licence holders. For instance, the NWB is seeking clarification on how the designation for Mineral Exploration and Production applies to projects that are at early exploration stage, but will eventually progress to advanced exploration and/or mining stages. If there are existing provisions (e.g. grandfathering provisions) that are intended to apply to existing users, then specific timelines should be detailed as part of the Options document and/or DNLUP. Details regarding how the designation will treat any other activities associated with, but not currently listed under the Commission's recommended option for Mineral Exploration and Production (Option 3), should also be provided.

2.6 Periodic Review

The NWB is interested to receive further details pertaining to the manner through which its own evolving needs will be incorporated into the NLUP in the near and distant future. In particular, further details pertinent to the periodic review of the NLUP should be provided to all planning partners and interested parties, including the anticipated timelines for a 'standard amendment', information requirements, and a process overview. There should also be a discussion in the Options document or DNLUP that details the feedback loops that will be incorporated to inform the periodic review sessions (e.g. *monitoring programs, types of data being collected, the stakeholders who will be involved in such review periods, etc.*).

2.7 Permitted or Prohibited Uses

The NWB is concerned that the term ‘Permitted Uses’ may be misconstrued as meaning ‘*activities that require permits*’. It would be preferable to use terms such as ‘allowable’ or ‘permissible’ to avoid any confusion. If the Commission is unwilling to modify its use of this term, the NWB recommends that text be added to the definition that provides clarification, such as “*Permitted Uses do not necessarily refer to the requirement for a government authorized permit*”.

3. Draft Nunavut Land Use Plan

The NWB has brought many of the following issues to the Commission’s attention in past meetings. From the NWB’s perspective, addressing these issues is a critical step towards developing an effective DNLUP. As such, they have been provided again for the Commission’s consideration and should be recognized as topics that will be raised for discussion by the NWB and/or other interested parties at the next possible opportunity. These issues include the following:

3.1 Water Management Areas and the Strategy for Water Management

The NWB has emphasized the importance of including the boundaries of the 65 Water Management Areas (WMAs) in the DNLUP to the Commission from almost the inception of the Commission’s process (e.g. *submissions to the Commission, one-on-one meetings, workshops, etc.*). To the NWB’s understanding, the Commission had actually gone as far as to include the WMAs in a previous iteration of the DNLUP, but then subsequently removed them without explanation. Nonetheless, at the Commission’s most recent workshop (September 17-19, 2013), the Commission stated that the WMAs would be included in the next iteration of the DNLUP¹. The usage of water-related terminology by Commission staff also increased as the workshop progressed, such as the acknowledgement that land-use planning in Nunavut should strive to develop plans at the ‘watershed scale’ as the territory moves forward. These are encouraging developments that are highly supported by the NWB.

¹ Livingstone, David (Facilitator). (2013). *Nunavut Land Use Plan Workshop: “Filling Gaps in the Draft Nunavut Land Use Plan”, Workshop Report (“The Ship is Sailing”)*. Cambridge Bay, Nunavut.

While the Commission has already agreed that the WMAs should be included in a revised version of the DNLUP, the Commission has also requested that the NWB document the rationale for this recommendation by providing further details in the NWB's submission to the Commission. In response to the Commission's request, the NWB is confirming that it strongly supports the inclusion of the boundaries of the 65 WMAs defined in the *Nunavut Waters Regulations* (the Regulations) (*SOR 2013/669 18th April, 2013*) in the DNLUP. There are many reasons why it is important to include the 65 WMAs as a fundamental feature of the NLUP, including the following:

Watershed Planning

Deciding which activities and ecosystem components should be considered in land use planning decision-making can be challenging (e.g. *should activity 'x' at distance 'y' from land feature 'z' be considered?*). Moving towards watershed planning could directly assist the Commission in such decision-making processes by providing a spatial metric through which a comprehensive assessment of land uses in each respective WMA can be conducted, which may further support the Commission's determination of cumulative effects. For instance, consider how land use planning goals under the DNLUP relate to the mining activity occurring in WMA 5 (Lower Thelon Watershed), represented on the territory-wide maps provided in Appendix A (Maps 1-4). Were the Commission to approach land use planning at the watershed scale in WMA 5, a wide range of interrelated issues could be addressed at a level that is manageable both in terms of conceptualizing problems and addressing them with planning partners. Consider how the DNLUP's goals for the thematic area '*Encouraging Conservation Planning*' are affected by *not* providing consideration to the impacts of other activities occurring within the watershed. In this particular example, the DNLUP's goal of protecting the Thelon River² cannot be adequately met if impacts from activities occurring within the watershed are not accounted for in the design of conservation plans and/or the authorization of further activities (e.g. *the effects of mining activities on*

² The Thelon River is a transboundary river (NWT-NU) that has been designated as a Canadian Heritage River. A portion of the Thelon River is located within the Thelon Wildlife Sanctuary.

the Thelon River may go unaccounted for when a watershed planning approach is not used, as the analysis for decision-making may be occurring on a different spatial scale). This approach has already been applied on the Soper River (another Heritage River), wherein the management plan applies to the entire watershed of the river.

Water Management Strategy

The WMAs are part of the central mechanism through which the NWB and its partners will seek to incorporate the strategy that will be developed for water management across Nunavut. Should these boundaries not be incorporated at this time, there is the possibility that the final land use plan would need to be amended multiple times in order to incorporate policies that will be developed for each respective WMA.

In all cases where it is unclear to the Commission on how to approach a given water management issue, the NLUP should refer the interested party or applicant to the Strategy as part of their conformity determination with the Commission, wherein a project's proponent is required to confirm that it (a.) meets the requirements of the Strategy or (b.) has received authorization from the NWB to proceed through the regulatory process. Ultimately, the DNLUP should include language and conditions that are sufficiently flexible to allow for an immediate or subsequent integration of the Strategy's policies and associated water management actions.

A list of the WMAs and associated metadata has been provided for your reference in Appendix B.

Legislative Authority

The WMAs have been officially defined in federal legislation (the Regulations) and have thus been deemed an essential component of Nunavut's overall natural resources management regime.

The NWB is therefore, once again, recommending that the Commission incorporate the WMAs as a fundamental planning feature, represented on all maps of all scales. The NWB further encourages the Commission to actively move towards using the WMA boundaries as the preferred spatial scale for planning in Nunavut.

3.2 Recognizing the Value of Water

At the most recent workshop held by the Commission, recognition was given to “*the importance of water as a critical feature on its own*”³. As accentuated by the NWB at the workshop, water should receive recognition for its own sake, just as ‘caribou habitat’, ‘transportation infrastructure’, ‘aerodromes’, and many other topics have received in the DNLUP. While the DNLUP implicitly considers water through its definition for *land*⁴, it is important that the DNLUP explicitly recognizes the role and value of water given that impacts to water resources may affect all other ecosystem components covered in the DNLUP. In particular, the NWB looks forward to seeing the inclusion of a discussion in the next iteration of the DNLUP that gives attention to themes such as ecosystems’ fundamental need for water to sustain integrity and the valuation of water as an economic and therefore social resource. The DNLUP should ultimately recognize that water is a fundamental consideration in land use planning and refer its audience to the NWB’s strategy for water management for consideration of specific water management concerns (i.e. *the strategy that is currently being formulated by the NWB and its partners*).

3.3 Cumulative Impacts

In the Options document, the Commission presented the following two options for managing cumulative impacts in Nunavut:

Option 1: Develop a directive in consultation with the NIRB with regard to referring project proposals with potential cumulative impacts for review.

³ Livingstone, David (Facilitator). (2013). *Nunavut Land Use Plan Workshop: “Filling Gaps in the Draft Nunavut Land Use Plan”, Workshop Report (“The Ship is Sailing”)*. Cambridge Bay, Nunavut.

⁴ Land – includes water and resources including wildlife.

Option 2: Implement agreed upon thresholds for land use activities.

As there are no agreed upon thresholds at this time, the Commission has proceeded to recommend Option 1. While the DNLUP currently states that it is the Commission's Policy to "consider implementing thresholds for cumulative impacts, or levels of acceptable change...", there are no details regarding the process forward through which such thresholds would be developed. The NWB recommends that the Commission (a.) includes the NWB in the development of the directive for referring project proposals with potential cumulative impacts for review and (b.) develops a general work plan or 'path forward' with its Planning Partners that would facilitate the development of thresholds.

Furthermore, as noted above, the WMA boundaries can assist the Commission in conducting its cumulative effects assessment by providing a spatial unit of analysis that would not exist otherwise. The overloading of a watershed with projects and their associated cumulative impact on the ecosystem would not be accurately captured under the current iteration of the DNLUP. As such, the NWB recommends that the Commission includes the WMA boundaries and actively uses them to assist the Commission in the analyses it conducts. The NWB may also be uniquely positioned to provide some of the relevant data (e.g. *data that supports an environmental baseline for certain regions*) in this regard as its new technological systems are implemented and pertinent data feedback loops are initiated.

3.4 Use of Public Input from Community Tour

The extensive data-gathering undertaking the Commission is currently conducting and the resulting information will significantly benefit both Nunavummiut and the Commission's Planning Partners. The NWB recognizes that the Commission's tour of Nunavut's 26 communities is in progress and that 'the ship is sailing' in regards to input for the DNLUP. Nonetheless, as a note for future community meetings, the NWB feels strongly that the current community meetings would have benefited from a more directed approach that made use of guidance from the NWB prior to visiting the communities, such as guidance for the types of probing questions that draw upon Inuit Qaujimajatuqangit (IQ) and other elements of concern in order to provide

guidance to the NWB in areas that are meaningful to it (e.g. *information that is useful for the purposes of water management*).

In regards to analyzing the resulting data, it is the NWB's understanding that there has been no weighting of the public input (e.g. *1 community member identifies issue X as a concern, 9 community members identify issue Y as a concern*). While the NWB anticipates that the Commission will adequately assess the results of the community tour prior to finalizing the NLUP, it is not clear if the resulting analyses will be made available to the Commission's Planning Partners and stakeholders, where it is considered relevant. As such, the NWB recommends that the following be provided to all concerned parties: (a) raw data from community tours, (b) the results of all relevant final analyses, and (c) descriptions of the corresponding methodologies.

Much like the Commission and its DNLUP, the NWB is working diligently towards developing a strategy for water management that will protect the environment, while providing benefits to both Nunavummiut and Canadians alike.

Conclusion

The NWB looks forward to continue its work with the Commission in the context of the DNLUP to address the issues identified in this letter (and others). In addition, the NWB would like to reiterate its commitment to fully participate in the next stages of the Commission's planning process. Further, the NWB would be willing to discuss, if required and at the request of the Commission, potential ways to address Board's concerns and recommendations with the Commission as contained in this submission.

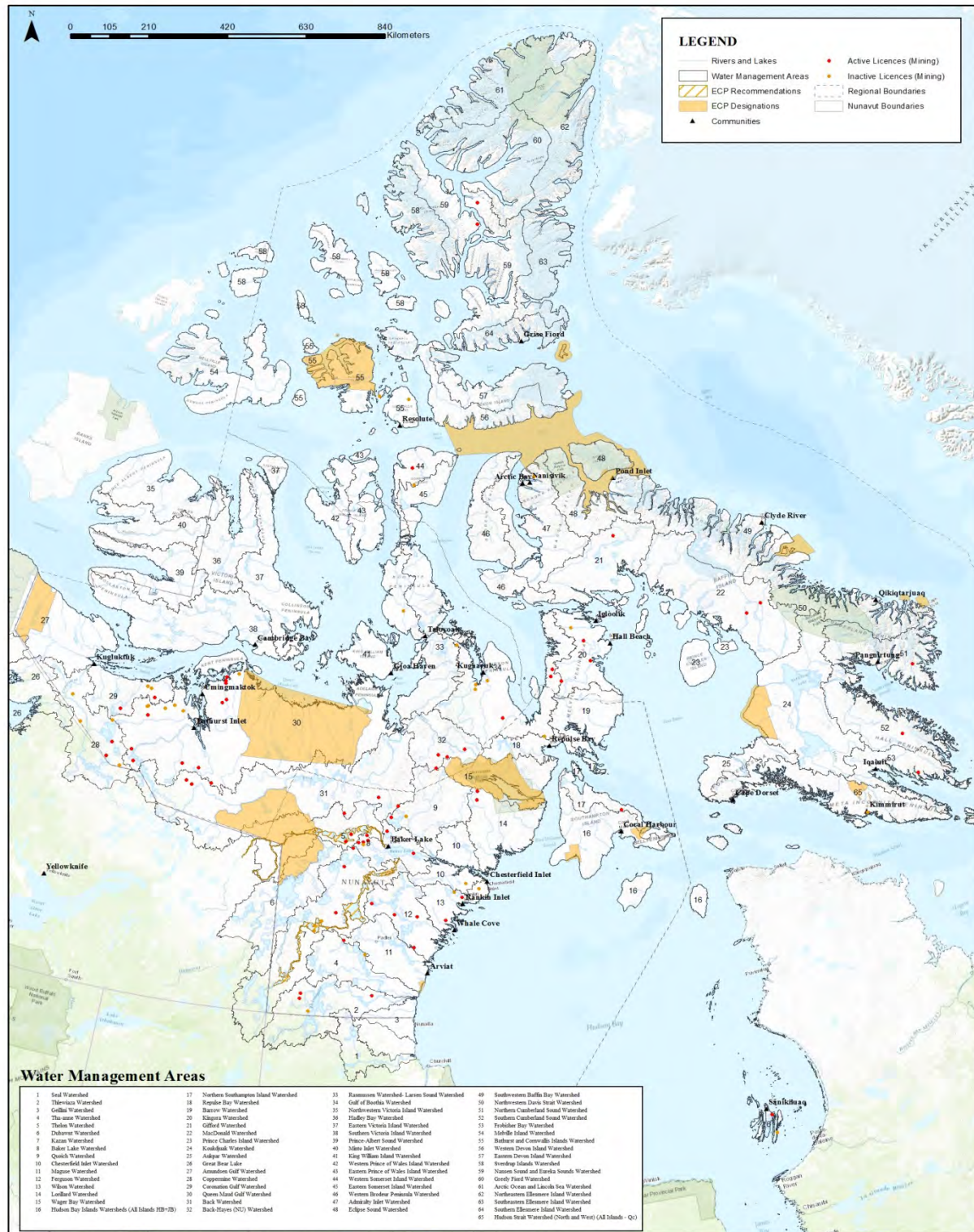
Appendix A Illustrative Examples of Nunavut's 65 WMAs incorporated with NPC's Recommendations and Designations for the DNLUP.

Map 1 Water Management Areas and the Draft Nunavut Land Use Plan

Protecting and Sustaining the Environment



Map 2 Water Management Areas and the Draft Nunavut Land Use Plan *Encouraging Conservation Planning*



Map 3 Water Management Areas and the Draft Nunavut Land Use Plan

Building Healthier Communities



Map 4 Water Management Areas and the Draft Nunavut Land Use Plan *Encouraging Sustainable Economic Development*



Appendix B Nunavut Water Management Areas – Descriptions⁵

⁵ Nunavut Water Regulations Development Group (NWRDG) (2010). *Nunavut Watersheds Descriptions*. Iqaluit, NU.

