

## Master Comments from Beverly and Qamanirjuaq Caribou Management Board

Comment ID	Organization Name	Date of Submission	Document Referenced	Section Referenced	Theme of submission or Location /ID# Referenced	Comment	NPC Response
BQCMB-1	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014	Options	p17	Caribou	Clarification about the Position of the BQCMB There is one major error in the Draft Plan that I would like to bring to your attention. In the Options and Recommendations document under "Calving Areas" and "Water Crossings" an erroneous statement is included three times (p. 17, 18, 19). "The direction of the Athabasca Dene and the Beverly-Qamanirjuaq Caribou Management Board is that no development should be permitted in caribou habitat." The position of the Beverly and Qamanirjuaq Caribou Management Board is that "no development should be permitted in caribou calving and post-calving areas", not that "no development should be permitted in caribou habitat". The distinction between these statements is important, and is a key element of BQCMB input that has been provided to the NPC for land use planning over the years, including the comments we provided on the Working Draft Land Use Plan and the comments we are providing now and throughout the NPC's consultation process on the 2011/2012 Draft Plan.	The Options and Recommendations document has been revised.
BQCMB-2	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014	DNLUP	2.1.2	Caribou	Please note that the BQCMB is not against mining or other forms of economic development. But the Board believes that it is essential that key important caribou habitats should be protected to ensure that caribou herds can obtain their essential ecological requirements and continue to function as freeranging herds. This means that there are some places that should not be open to all human land uses at any time. Calving and post-calving areas are those crucial habitats for caribou.	The revised DNLUP addresses calving and post-calving areas. Areas where there is no mineral potential have been protected from development. This amounts to nearly 5% of the NSA. Areas where there is believed to be mineral potential or existing mineral rights the Plan proposes cumulative impacts referrals and other Terms to ensure only project proposals that have been screened for impacts will be able to proceed into the regulatory process. The Plan also prioritizes research that needs to be undertaken to better protect caribou. This approach has been taken to minimize fragmentation of caribou habitat.
BQCMB-4	Beverly and Qamanirjuaq Caribou Management Board	14/02/2014				To assist with further review of the Draft Plan by the BQCMB, we would appreciate receiving the following documents: • Existing documents (Please confirm that you will be accepting comments on these documents until May 2014, as indicated in materials from your September 2013 workshop): - Working Together Document - draft implementation guide for the NLUP - Cumulative Impacts Referral Directive and reference map - for "conforming below threshold projects" • Documents to be provided for review prior to the Public Hearing: - Revised Options and Recommendations document - Results of community consultations for Kivalliq and Kitikmeot regions	Please see the NPC website for the requested documents. <a href="http://www.nunavut.ca/en/downloads">Http://www.nunavut.ca/en/downloads</a>
BQCMB-5	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014	DNLUP		Caribou	There is recognition of the importance of caribou ecologically, culturally and economically in the description of the Commission's vision and in the background information provided in both the Draft Plan and the Options and Recommendations document. However, the management options recommended in the Draft Plan for managing land use in caribou habitat do not adequately reflect this importance, or the need to ensure that land use planning supports the long-term future of healthy caribou herds. The primary inadequacies of the Draft Plan related to caribou include those outlined below. - The management options recommended for caribou calving grounds are not adequate for protecting habitats in calving and post-calving areas and around water crossings from damage associated with industrial development, or for protecting caribou from disturbance when they are using these important habitats. - No management actions are recommended for any seasonal ranges outside of calving grounds. - The Caribou Protection Measures or similar measures are not recommended for protecting caribou from disturbance effects of mining exploration and development and other land use activities.	The DNLUP has been revised. Please review the information that was considered in the decision. This information is available in the Options and Recommendations Document.
BQCMB-6	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014	DNLUP/Options and Recommendations Document		Caribou	The lack of management options providing protection for important caribou habitats and caribou in the Draft Plan contrasts strongly with the position taken by the Commissioners in the Keewatin Regional Land Use Plan (p. 56), which was stated as follows: "The NPC continues to think that, by providing protection to certain critical areas, the majority of the planning region can remain open to exploration and development." The BQCMB infers that the intent was that exploration and development was to be conditional on "providing protection to certain critical areas". The approach taken in the Draft Plan is not consistent with this position.	Comment has been addressed above.
BQCMB-7	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014	DNLUP/Options and Recommendations Document		Caribou	Our primary recommendations at this time are: 1) NPC should develop land use designations that protect caribou calving areas, post-calving areas, and water crossings from negative effects of commercial land use activities.	Comment has been addressed above.
BQCMB-8	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014	DNLUP/Options and Recommendations Document		Caribou	2) NPC should develop a land use designation that prohibits any new exploration and development in calving and post-calving areas and limits allowed land uses to traditional uses, tourism and research. No new infrastructure related to commercial development, including roads, airstrips, exploration camp buildings or tourism lodges should be allowed in calving and post-calving areas.	Comment has been addressed above.

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BQCMB-9	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014	DNLUP/Options and Recommendations Document		Caribou	3) NPC should protect all "recently used calving and post-calving areas" defined as all areas known to be used by caribou within the last 20 years based on a) tracking caribou (collared cows) by telemetry b) results of calving ground surveys and c) IQ and local knowledge, with obvious outliers removed. Delineation of these areas should be redefined based on all available information every 5 years.	Comment has been addressed above.
BQCMB-10	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014	DNLUP/Options and Recommendations Document		Caribou	4) If the NPC is unable to implement the land use management recommendations of the BQCMB, Kivalliq HTOs and Nunavut Regional Wildlife Boards, NPC and signatories to the land use plan should establish a clear process for resolving the issue of conflicting views concerning protection of caribou calving grounds, post-calving areas and water crossings.	Comment has been addressed above.
BQCMB-11	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014	DNLUP/Options and Recommendations Document		Caribou	5) NPC should develop a land use designation that provides seasonal restrictions on land use activities within 10 km of designated water crossings.	We have not received information regarding the location of water crossings. Therefore water crossings are not included in the Draft Plan.
BQCMB-12	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014	DNLUP/Options and Recommendations Document		Caribou	6) NPC should develop a land use designation that provides seasonal restrictions on land use activities on caribou range outside calving and post-calving areas and water crossings that applies conditions similar to Caribou Protection Measures to minimize disturbance to caribou.	Comment has been addressed above.
BQCMB-13	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014	DNLUP/Options and Recommendations Document		ECP	7) NPC should apply land use designation ECP-1 "Assign a designation that permits tourism, recreation and research and prohibits all other uses" to the Thelon Wildlife Sanctuary, the Queen Maud Gulf Migratory Bird Sanctuary and the Thelon and Kazan Heritage Rivers.	The Plan has been revised to provide for protected areas and special management areas been applied to the areas suggested.
BQCMB-14	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014	Working Together		Cumulative Impacts	8) NPC should clearly describe how the Cumulative Impacts Referral process will operate and what the respective roles of NPC, NIRB and other parties will be for identification, assessment, monitoring and mitigation of cumulative effects.	The Implementation Strategy of the Plan has been revised to bring clarity to what types of project proposals and when projects may be referred.
BQCMB-15	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014	DNLUP		Transboundary	9) NPC should clearly describe how the Plan will consider transboundary effects when making land use planning decisions that may affect Aboriginal caribou harvesters from adjacent jurisdictions, and how planning decisions may be influenced by input from these groups.	The NPC has consulted with the aboriginal groups in Saskatchewan and Manitoba in adjacent jurisdictions as contemplated under Article 40 of the NLCA.
BQCMB-16	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014	KRLUP			10) NPC should explain why the types of direction provided by Action 2.6, the "Code of Good Conduct for Land Users" and the Caribou Protection Measures, which are measures in the Keewatin Regional Land Use Plan designed to provide protection for caribou (and other wildlife in some cases), were not adapted for inclusion in the Draft Plan.	The Keewatin Plan was approved in June 2000. This Plan will have the support of federal legislation and is enforceable. Aspects of the Code of Good Conduct and caribou protection measures are dated. As Government develops standards to managing the caribou herds the Plan can be amendment to incorporate setbacks and other direction as research and policy be mutually supportive.
BQCMB-17	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014	KRLUP		Uranium	11) NPC should provide clear rationale as to why Action 3.6 from the Keewatin Regional Land Use Plan, which states that "proposals to mine uranium must be approved by the people of the region", was not carried forward into the Draft Plan.	The DNLUP looks at the land use of mining in general and does not consider individual commodities. Under the Nunavut Land Claims Agreement the Commission is responsible for determining conformity of project proposals. Government is responsible for determining this type of policy direction.
BQCMB-18	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014				Decisions made by NPC and land claim signatories could affect the fate of many caribou herds and the sustainability of traditional cultures in numerous communities that have depended on harvest of caribou, in Nunavut as well as neighbouring jurisdictions. Due to the shared nature of the renewable resource provided by the Beverly, Qamanirjuaq and other caribou herds, how Nunavut plans for this increasing land use is of great interest to the BQCMB and the governments and communities both inside and outside Nunavut that the Board represents. Evidence for this common concern and the desire for protection of caribou calving and post-calving areas among caribou harvesters and the organizations that represent them has been provided through resolutions and other statements to NPC and others by many Nunavut organizations as well as other Aboriginal organizations. Attachment D provides the documents that are available to the BQCMB at this time that demonstrate this common position is held by: - Nunavut's three regional wildlife boards: Kivalliq Wildlife Board, Kitikmeot Wildlife Board, Qikitarjuaq Wildlife Board - Kivalliq Hunters and Trappers Organizations: Arviat HTO, Baker Lake HTO, Chesterfield Inlet HTO, Whale Cove HTO - Aboriginal organizations that represent caribou harvesters outside Nunavut: Athabasca Denesuline Né Né Land Corporation, Fort Smith Métis Council, Lutsel K'e Dene First Nation.	Comment has been addressed above.
BQCMB-19	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014			Caribou	Attachment A. Background for BQCMB Comments on the Draft Nunavut Land Use Plan <i>[Not included in table]</i>	Information considered
BQCMB-20	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014			Caribou	Attachment B. Comments and Recommendations for Revisions to Draft Nunavut Land Use Plan <i>[Additional details on 11 recommendations listed above - not included in table]</i>	Information considered

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BQCMB-21	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014			Caribou	Attachment C. Role of the Nunavut Land Use Plan for Managing Caribou Habitat in Nunavut <i>[Details not included in table regarding correspondence between the BQCMB and NIRB regarding the management of caribou habitat in Nunavut ]</i> ... It is clear that the NPC is the sole Nunavut organization that has a mandate broad enough to address the concerns of the BQCMB, the Kivalliq Hunters and Trappers Organizations, the Kivalliq Wildlife Management Board, and caribou users both inside and outside of the Nunavut Settlement Area. It is clearly the role of the Nunavut Land Use Plan to provide guidance for management of caribou habitat in Nunavut.	Comment has been addressed above
BQCMB-22	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014			Caribou	Attachment D. Statements from Organizations Representing Traditional Caribou Harvesters Recommending Protection of Caribou Calving and Post-calving Areas. - Nunavut’s three regional wildlife boards: 1) Kivalliq Wildlife Board 2) Kitikmeot Wildlife Board 3) Qikitarjuaq Wildlife Board - Kivalliq Hunters and Trappers Organizations: 4) Arviat HTO 5) Baker Lake HTO 6) Aqigiq (Chesterfield Inlet) HTO 7) Arviq (Repulse Bay) HTO 8) Issatik (Whale Cove) HTO - Aboriginal organizations that represent caribou harvesters outside Nunavut: 9) Athabasca Denesuline Né Né Land Corporation 10) Fort Smith Métis Council 11) Lutsel K’e Dene First Nation	Information. These submission are posted on the NPC DNLUP Consultation Record