

Master Comments from Northwest Territories / Nunavut Chamber of Mines

Comment ID	Organization Name	Date of Submission	Document Referenced	Section Referenced	Theme of submission or Location /ID# Referenced	Comment	NPC Response
Chamber-01	NWT/Nunavut Chamber of Mines	06/02/2014	Working Together	3.1.1.3	National Marine Conservation Areas- Lancaster Sound	Lancaster Sound is a critical marine transportation corridor in support of development in Nunavut. Although it is recognized that shipping can be permitted within a NMCA, the NWT & Nunavut Chamber of Mines ("the Chamber") seeks assurance or clarification that the identification of sensitive marine features in Lancaster Sound would not preclude these critical activities.	The NLUP will not apply in the area once the NMCA has been established. Land Use Designation have been revised to clarify this concern.
Chamber-02	NWT/Nunavut Chamber of Mines	06/02/2014	DNLUP	3.1.2.2	Migratory Birds Sanctuaries	Environment Canada's focus on identifying almost all Key Migratory Bird Habitat Sites as "Highly Risk Intolerant" is extreme. If the DNLUP incorporates these designators, many habitat sites will be given the same standing as the Queen Maud Bird Sanctuary, discouraging exploration and alienating areas where exploration already has occurred without incident in the past.	General comment noted. The Commission's broad planning policies, objectives and goals guide the decision making on the Plans content. Areas with existing rights are considered to conform to the Plan in all land use designations.
Chamber-03	NWT/Nunavut Chamber of Mines	06/02/2014	DNLUP	4.1.1.1	Hiukitak River	The Kitikmeot Inuit Association is developing plans to create a conservation area in and around Hiukitak River south west of Boston. The Chamber supports this initiative.	The Plan has been revised accordingly.
Chamber-04	NWT/Nunavut Chamber of Mines	06/02/2014	DNLUP	4.2.1	Transportation Infrastructure	Transportation Infrastructure is a critical need of industry in developing projects throughout Nunavut at remote locations. The Chamber supports the establishment of transportation corridors in Nunavut to add certainty to move forward plans to construct roads and rail links that will add to the economic feasibility of mining projects in the territory. A number of transportation corridors have already been identified in the DNLUP. However, a transportation corridor in the Kitikmeot has not. The Chamber urges the NPC to consider establishing a transportation corridor in the DNLUP that will allow the orderly and sustainable development of the northern portion of the Slave Geological Province. At least 3 proposed corridor routes are known and deserve the consideration of the NPC: BIPR; MMG Izok Corridor Road route and; the Hope Bay Phase II Road route. The Chamber recommends that the NPC include the transportation corridors currently proposed by various proponents and refer them as "potential transportation corridors" in the plan. Also, the Chamber would like to see other important infrastructure elements identified in the plan, including proposed or potential port sites, ice roads and shipping routes.	The DNLUP identifies transportation corridors that are for public use and are intended to be long term as opposed to be for temporary private use. The Plan does not determine "where" transportation corridors. Instead the Plan identifies where corridors "cannot" be established. For clarity, accessory uses that conform to the Plan include temporary uses such as winter roads, open water shipping and associated ports, staging and warehousing.
Chamber-05	NWT/Nunavut Chamber of Mines	06/02/2014	DNLUP	5.1	Diversified Economic Development	The Plan should not encourage a fear of development. In the cases where ecological values are legitimately sensitive, the Chamber would like the NPC to opt for no permanent protection of conservation areas in favour of 5-year protection. The NPC could revisit every 5 years with the iteration of the Plan to see if wildlife have moved or if community priorities have changed. That way less land is locked up in permanent designations like national parks or national wildlife areas. Another option to consider is to expand the scope of the periodic review process (Section 7.6) to include consideration of land use designations. Adjusting the plan to respond to changes in caribou calving areas over time is a good example of a situation where this type of provision could be applied. However, this type of a provision would need to be guided by clear criteria defining when and how it could be applied to avoid undermining land use certainty. A simple mechanism that takes into account the intended dynamic nature of the DNLUP should be added, so that it is clear that protection is not a one-way street and that land-users have the option to change their minds on the basis of need and new information, including geosciences, and new technologies like hybrid air vehicles that could reduce the need for road access. Text is devoted to the potential for making land use more restrictive for an area but not for steps which can be taken to turn a Category 1 area (Protecting and Sustaining the Environment) into Category 5 (Mixed Use).	The Implementation Strategy section regarding Periodic Review and Monitoring has been revised to address the concern. The Plan identifies priority and values that will need to be considered for mitigation as the project moves on to NIRB / government through the regulatory. These requirements are the results of our community mapping workshops completed.
Chamber-06	NWT/Nunavut Chamber of Mines	06/02/2014	DNLUP	5.1.1	Mineral Exploration and Production	The Chamber encourages the NPC to work closely with government partners to include all areas of known high mineral potential in Nunavut under the "Encouraging Sustainable Economic Development" designation, provided that no other conflicting land use may exist for such lands. Mineral exploration and production is a critical component of the long term sustainability and economic independence of the territory. In addition to industry input, the Government of Nunavut's Mineral Exploration and Mining Strategy "Parnautit" should be considered when revising the DNLUP, as should input from geologists from Aboriginal Affairs and Development Canada, the Canada-Nunavut Geoscience Office, and the Government of Nunavut. New conservation polygons have been developed, but information/layers relating to mineral potential and existing mineral tenures are not currently reflected in the plan. A series of mineral potential maps should be included, similar to the maps that have been produced for commercial fisheries potential. Mineral potential maps for various mineral commodity groups could readily be produced using existing data.	80% of the NSA remains open to mining exploration and development. Nearly 6% of the NSA is exclusively for mineral exploration and development. The Plan does contain 15% protected area where mining is prohibited. These include core caribou calving and post calving areas, unique habitat for polar bear, walrus, whales and seals.
Chamber-07	NWT/Nunavut Chamber of Mines	06/02/2014	DNLUP	6	Mixed Use	To encourage Mixed Use, the Plan should express an intention to incorporate corridors in the future for consolidating various industrial activities i.e. transportation, pipelines, communications, and utilities/power transmission lines.	65% of the NSA has a mixed use designation. Mining activities are able to occur in over 80% of the NSA.