

Master Comments from Qikiqtani Inuit Association

Comment ID	Organization Name	Date of Submission	Document Referenced	Section Referenced	Theme of submission or Location /ID# Referenced	Comment	NPC Response
QIA-1	Qikiqtani Inuit Association	14/02/2014	Working Together		Community Notifications	The Qikiqtani Inuit Association is proposing a method to continuously involve communities in the land use planning and project review processes. The first step is to introduce a requirement for community notification and consultation into the conformity determination stage of project review.	General comment noted. This has been taken into account in the revised DNLUP. The Plan discusses the importance of including residents early in the design phase of project proposals. The Plan encourages engagement but is it “mandated” to impose consultation requirements. The NPC will be automating the review of project proposals and the NPC will be notifying communities of activities. We do not believe that the NPC is “mandated” to impose consultation requirements.
QIA-2	Qikiqtani Inuit Association	14/02/2014	Working Together		Community Notifications	QIA has proposed a mechanism in the consultation guide to involve communities early on in the conformity determination process so that they can be informed of activities that could impact the land or water within, or adjacent to, their community boundaries. This engagement early on will provide certainty and also solidify relationships between proponents and communities. QIA is taking the stance that the NLUP can apply to IOL if this means that there will be better engagement with communities early-on and also that Inuit are able to be active decision makers on potential land use activities on Crown Land near their community boundaries.	General comment noted. This has been taken into account in the revised DNLUP.
QIA-3	Qikiqtani Inuit Association	14/02/2014	Working Together/DNLUP		Plan amendment	QIA is also of the opinion that the Nunavut Land Use plan remain a fluid document which would be amendable as the values of community members may change over time.	The Implementation Strategy section regarding Periodic Review and Monitoring has been revised to address the concern.
QIA-4	Qikiqtani Inuit Association	14/02/2014	Working Together/DNLUP		Public Registry	As per section 4.3.7 of the NPC Implementation document, QIA requests that the NPC provide the resources to host an on-line registry of Proponent Consultation Reports as well as respective Community Checklists for each project.	NUPPAA outlines the requirements for the content of the online public registry. Comment addressed above.
QIA-5	Qikiqtani Inuit Association	14/02/2014	Working Together/DNLUP		Notification	Section 4.3.3 & 4.3.4. In order to be consistent with the requirements of the consultation/notification guidelines QIA recommends that section 4.3.3 of the implementation document indicate that the project proposal must also include the Proponent Consultation Report (Form 1 in the consultation guide) that the proponent is required to submit to NPC for conformity determination.	General comment noted.
QIA-6	Qikiqtani Inuit Association	14/02/2014	Working Together/DNLUP		Notification	4.3.7: In this section of the document it states that “ NPC will also notify affected communities than an application has been received in accordance with the Notification Guidelines” QIA request further detail on how the affected communities will be notified, will this also be through the online public registry or will a different mechanism be used to contact these communities?	Refer to the revised DNLUP.
QIA-7	Qikiqtani Inuit Association	14/02/2014	Working Together/DNLUP	4.3.8	Notification	4.3.8 b) According to this section of the implementation document once the project proposal application is complete, NPC will “ establish if the proposal is contemplated in the area in which is it proposed and what, if any, recommendations or standards may apply to that location. QIA recognizes that NPC’s conformity determination is quantitative and not qualitative; however we suggest that any recommendations or standards that are applied to a conformity determination take into consideration the comments and community feedback as outlined in the consultation report (Form 2 in consultation guide) issued to NPC in accordance with the notification/ consultation guidelines.	The revised DNLUP outlines a notification process as part of an automated conformity determination process. The QIA proposal suggests that a party other than the NPC review the project and determine conformity. The NPC is unable to mandate the conformity determination decision to a third party.
QIA-8	Qikiqtani Inuit Association	14/02/2014	Working Together/DNLUP	5.4	Project Monitoring	Section 5.4: Project Monitoring: QIA questions why the NPC plans on conducting site visits and reviewing permits, licenses and authorization issued by regulatory agencies. Is this not duplicating what is already done by authorizing agencies? What additional value is there to NPC conducting these visits?	As per the NLCA section 11.4.4(l) the NPC shall monitor project to ensure that they are in conformity with land use plans.
QIA-9	Qikiqtani Inuit Association	14/02/2014	DNLUP	General	IOL	QIA has noted that the proposed management areas in the Draft NLUP are similar to the land selection criteria for Inuit Owned Lands as outlined in Article 17 of the Nunavut Land Claims Agreement. The proposed management plans in the DNLUP are: <ul style="list-style-type: none"> • Protecting and Sustaining the environment • Encouraging conservation planning • Building Healthier communities • Encouraging Sustainable Economic development In comparison, the selection criteria of Inuit Owned Land parcels are: <ul style="list-style-type: none"> • Conservation • Cultural importance • Commercial or economic value • Wildlife harvesting areas . The purposes of Inuit Owned Land Parcels and land use designations in the (Qikiqtani region have been established and recorded for this region. QIA notes the importance of ensuring that the original purpose of the IOL parcels correspond with the land use designation in the corresponding proposed management plan in the DNLUP.	The Goals of the Plan were developed in consultation with NTI, federal and territorial governments. The GN in particular also have documented similar goals. If the QIA would like to include the noted information in the land use planning process it will need to submit the information to the NPC. Data sources require relevant shapefiles and related validation. The QIA can provide additional information at the Public Hearing to through plan amendment.
QIA-10	Qikiqtani Inuit Association	14/02/2014	DNLUP/Options and Recommendations Document	3.1.1.3	Lancaster Sound NMCA	Throughout the feasibility study, QIA has been conducting community consultations and has collected Inuit Qaujimajatuqangit (IQ). In 2012, based on feedback from these consultations, QIA proposed a different boundary for the Lancaster Sound NMCA, which is larger than the area delineated by ECP-1 (79). The feasibility study for the NMCA is anticipated to be completed by the end of 2014, at this time the Steering committee will make a recommendation on the feasibility of the NMCA as well its final boundary. If upon completion of the feasibility study the boundary of the Lancaster Sound NMCA differs from that in the DNLUP, QIA would like to ensure that this change is reflected in the NLUP. How could the NPC accommodate a change in the boundary of the Lancaster NMCA if this was made prior to the completion of the NLUP and if it was made after the completion of the NLUP?	The QIA or Government is able to request a Plan amendment for the revised boundary at any point in time. NUPPAA further allows NPC to take into account the consultation undertaken as part of Park establishment. This would streamline the timeline for a plan amendment.

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QIA-11	Qikiqtani Inuit Association	14/02/2014	Working Together		Cumulative Impacts/Aerial Surveys	QIA believes that due to the high level of concern surrounding aerial surveys as well as the potential cumulative effects of numerous project proposals for aerial surveys, they should require a conformity determination from NPC and should be subject to the conditions of the consultation/notification guidelines developed by QIA. Section 12.3.3 of the NLCA states that the "NPC may refer a project proposal falling within Schedule 12-1 to NIRB for screening, where the NPC has concerns respecting the cumulative impacts of the project proposal ..." QIA strongly recommends that aerial surveys in the Qikiqtani region should be subject to a conformity determination from NPC for the reasons outlined in section 12.3.3 of the NLCA.	The DNLUP has been revised to consider the impacts of aerial surveys and cumulative impacts. The Plan specifically establishes when and where referrals may occur from cumulative impacts concerns.
QIA-12	Qikiqtani Inuit Association	14/02/2014	DNLUP/Options and Recommendations Document	Chapter 3	Soper River/ECP	Regarding the Soper River watershed, QIA believes that the entire Soper River watershed outside of Katannilik Park should be designated as ECP-R1.	As per the approved 11.4.1(a) document, it is an objective of the NPC to manage land use in and around areas of biological importance, conservation areas, areas of significance to Inuit, areas of interest or areas adjacent to National or Territorial Parks.