

QIA manages IOL to provide economic and cultural opportunities to Inuit. This is a permanent legacy for Inuit from the Nunavut Agreement. Land use planning must take into account Inuit goals and objectives for IOL, surface and subsurface. QIA does not support land use planning designations on IOL that do not respect QIA priorities for IOL. QIA raises the issues in this submission for the purposes of advancing dialogue within the ongoing land use planning process. QIA looks forward to updates how NPC will facilitate time and opportunity for groups like QWB and QIA to engage in the land use planning process together.

Caribou Protection

QIA is concerned with the absence of protective designations for caribou in the Qikiqtani region in the 2016 DNLUP. The Nunavut Land Use Plan must include adequate caribou protection. Baffin Island caribou are distinct from other caribou herds. The situation of the caribou herds in the Qikiqtani is also distinct. QIA considers it critical to have regionally-developed land use restrictions, caribou protection and mitigation measures in the Qikiqtani region within the Nunavut Land Use Plan. Through further dialogue, QIA is confident the land use planning process can identify protection measures that are specifically adapted to the Qikiqtani region.

Upon receipt of the QWB submissions, QIA conducted a high-level spatial analysis of existing IQ data in QIA's internal IQ database to compare it with the QWB submissions. A degree of uncertainty is inherent in this analysis given the timing and accessibility of these submissions. QIA determined that 10 of 14 QWB submissions have a strong degree of correlation with known areas of caribou habitat, including calving and post-calving areas, or areas important for community harvesting.¹ QIA determined that 4 of 14 QWB submissions did not appear to have a strong correlation with the known areas of caribou habitat in the QIA IQ database.² Again, though, these findings should not be considered determinative. Correlation in the spatial IQ *could* mean QIA agrees with proposed protected areas, but not necessarily the specific prohibitions or restrictions (see Specific Prohibitions section below). Digital shapefiles and adequate time would facilitate a more thorough review of the proposed prohibitions or restrictions in certain QWB submissions.

QIA requests NPC ensure the land use planning process gives adequate attention to the actual situation of caribou in the region over the past decade. There are small numbers of caribou, and strict harvesting quotas in place, to address the current caribou situation in the Qikiqtani. This fact should help make clear the importance of caribou protection in the NLUP

¹ WS06, WS07, WS08, WS09, WS10, WS11, WS32, WS33, WS34 and WS 36

² WS06, WS11, WS32 and WS34

and encourage a precautionary approach to reviewing and incorporating caribou protections in to the DNLUP.

The spatial extent of proposed caribou protections may be appropriate, subject to further specific verification. QIA is also concerned with some of the proposed prohibitions being applied to an area.

Specific Prohibitions

The QWB submissions outline a variety of prohibitions and restrictions which are applied in varying measures to the proposed areas. These prohibitions and restrictions may not align with QIA's perspective, particularly where IOL is engaged. QIA has a mandate to ensure IOL is managed according to Inuit goals and objectives. While the DNLUP process applies to IOL, NPC should not disregard Inuit decision-making authority, which is exercised in accordance with the IOL land selection reasons from when the Nunavut Agreement was negotiated. QIA requires a reasonable opportunity to review and respond to any proposed land use restrictions that affect IOL. QIA considers further time and opportunity to participate in dialogue within the land use planning process will allow NPC to facilitate the alignment of stakeholder perspectives with respect to specific land use planning prohibitions or restrictions.

Several of these prohibitions and restrictions pose potential issues for access to IOL parcels and have the possibility to alter access to IOL parcels and thus impede their use or development. The Obnoxious Land Use, Linear Infrastructure and Vessel Closure prohibitions proposed by the QWB are of particular concern to QIA because they may interfere with access to IOL or impede Inuit decision making authority on IOL use.

- **Obnoxious Land Use:**
Prohibitions or restrictions on obnoxious land use are proposed in 15 QWB submissions. Such a wide-reaching restriction may have a negative effect on potential specific land uses, the overall intended use of the IOL parcel and access to IOL. There are 218 instances of individual IOL parcels being overlapped or adjacent to QWB submissions with proposed restrictions or prohibitions on obnoxious land use.
- **Linear Infrastructure:**
Prohibitions or restrictions on linear infrastructure are proposed in 28 QWB submissions. Such broad restrictions on activities may prevent use or development of IOL parcels or pose challenges to accessing IOL. There are 492 instances of individual IOL parcels being overlapped or adjacent to QWB submissions with proposed restrictions or prohibitions on linear infrastructure.

- **Vessel Access:**

Vessel closures, whether complete or seasonal, are proposed in 15 QWB submissions. In many cases seasonal closures are recommended to protect the sea-ice platform while complete closures (including in the open water season) or set-backs are suggested to protect walrus haul outs, sea bird colonies and wildfowl areas, and other marine features. These closures may restrict marine access to IOL for a range of potential uses. There are 245 instances of individual IOL parcels being overlapped or adjacent to QWB submissions with proposed restrictions or prohibitions related to full or seasonal closures on vessel access.

Existing QIA Land Use Authorizations

A number of QWB submissions propose prohibitions or restrictions in areas that overlap or are adjacent to IOL parcels, including IOL containing existing land use authorizations issued by QIA. The QWB submissions to the NPC overlap with the locations of 29 IOL parcels attached to the communities of Arctic Bay, Grise Fiord, Hall Beach, Igloodik, Resolute Bay, Pond Inlet and Pangnirtung. This presents an unreasonable constraint on QIA's management of IOL and may risk frustrating legitimate and reasonable IOL use.

The land use authorizations issued by QIA for these IOL encompass a wide range of activities including tourism and outfitting ventures, prospecting and mineral exploration, and archaeological and geoscience research. These activities, either in form or intent, may be incompatible with restrictions and prohibitions proposed by QWB. The restrictions and prohibitions proposed could limit access (for example by restricting vessel traffic, or limiting linear infrastructure such as access road construction), limit the use of equipment by prohibiting obnoxious land use (for example ATV's for access, or vessel traffic tourism) and thus limit or prevent the activities which QIA has already permitted.

Please see Appendix 1, attached, for details.

Contradictory Intent of QWB Submission and IOL

There are a number of QWB submissions where the submission purpose and its proposed restrictions and prohibitions directly contradict the intent of the overlapped or adjacent IOL parcel. This includes parcels with subsurface rights held by NTI on behalf of all Inuit of Nunavut. Of particular concern due to the high number of parcels overlapped are submissions WS-07, WS-08, WS-11 and WS-28. Appendix 2 shows the full table of IOL parcels that are affected by each QWB submission.

Please note that some IOL parcels may overlap with multiple QWB submissions and may be impacted by different sets of proposed restrictions and prohibitions. Due to lack of spatial data files indicating the exact location of QWB submission areas, QIA'S analysis has not

confirmed whether this is because a single IOL parcel is split between two or more QWB submission areas, or whether different QWB submissions are themselves overlapping. Both scenarios are possible.

Please see Appendix 2, attached, for details.

Conclusion

QIA appreciates this opportunity to comment on the QWB submissions and make a final comment on the 2016 DNLUP. QIA insists there be more dialogue facilitated through the land use planning process to address the issues outlined in this letter. QIA reviewed the QWB submissions against data such as the intent for IOL selection and use, as well as existing land use authorizations. Specifically, the areas of overlap between the QWB submissions and IOL warrant further dialogue between and with Inuit stakeholders within a land use planning process. Appropriate caribou protections are vital to developing an effective Nunavut Land Use Plan, particularly in the Qikiqtani where no protections currently exist.

QIA looks forward to NPC providing clarification and direction on the next steps in the land use planning process. The QWB submission is important to consider, despite the format of the information provided. Nonetheless, QIA is also standing by to provide a more thorough response to the proposed measures once provided the time and opportunity. It is important that Inuit have effective and adequate consultation for the long-term planning around land use that affects them. QIA and QWB, through our submissions, are contributing to this process. QIA looks forward to NPC facilitating more engagement through the preparation of the next draft of the DNLUP.

Sincerely,



Jeremiah Groves
Executive Director

CC: Qikiqtaaluk Wildlife Board
Kilikvak Kabloona, CEO, Nunavut Tunngavik, Inc.

Appendix 1 – IOL Parcel with Existing Land Use Authorizations

The table below outlines each IOL parcel with existing permits that is overlapped or adjacent to areas proposed for restrictions by the QWB. Parcels that hold subsurface rights are indicated in brackets. The name of the project or activity authorized under the existing QIA permit is provided, with type of project provided in brackets where necessary.

Submission	IOL Parcel (Subsurface rights indicated)	Land Use Authorization
WS-02 - Site #41 Walrus Haul-outs (Ulliit)	IG-03 (Adjacent) - Subsurface	Ege Bay (exploration)
	IG-09 (Adjacent)	Kapuvik Archaeology Project
WS-03 -Community Area of Interest - Walrus Harvesting	PI-11 (Adjacent)	Students on ice, Students on ice 2019 expedition (tourism)
	HB-01 (Adjacent)	Hall Beach Regional Prospecting Program
WS-05 - Site #73 - Community Area of Interest - Foxe Basin	IG-09	Kapuvik Archaeology Project
WS-07 - Community Areas of Interest - Caribou and Reindeer Harvesting	PI-08	le soleal, MS Sivercloud cruises (tourism)
	HB-01	Hall Beach Regional Prospecting Program
WS-08 - Community Areas of Interest - Caribou Calving and Post Calving	PI-41	Eyos Hortense Kamaxitha, le soleal, Students on ice , Students on ice 2019 expedition (tourism)
	RB-02	Boothia-Somerset Geoscience Mapping, Eyos Hortense Kamaxitha (tourism)
WS-10 - Community Areas of Interest – Caribou Migration	HB-01	Igloodik Tuniit Archaeological Project
	HB-01	Hall Beach Regional Prospecting Program
WS-11 - Community Area of Interest – Multiple Values Area	PA-17	GN Fishing Cabin
WS-13 - Community Areas of Interest -	HB-01	Hall Beach Regional Prospecting Program

Polar Bear Denning, Emergence and Mating	AB-62	Harry Iyerak AB 62 Prospecting
	RB-12	Resolute evolution and environments of the earliest jawed fishes (research)
WS-15 - Community Areas of Interest – Eider Nesting	PI-41	Eyos Hortense Kamaxitha, le soleal, Students on ice , Students on ice 2019 expedition (tourism)
WS-17 - Community Areas of Interest – Seabird Harvesting	PI-08	le soleal, MS Sivercloud cruises (tourism)
	PI-29	Students on ice , Students on ice 2019 expedition (tourism)
WS-19 - Community Area of Interest – Beluga and Narwhal Harvesting	RB-02	Boothia-Somerset Geoscience Mapping, Eyos Hortense Kamaxitha (tourism)
	IG-22 (Adjacent)	Moshi Kotierk Richards Bay Prospecting
	IG-17 (Adjacent)	Moshi Kotierk Richards Bay Prospecting
	IG-18 (Adjacent)	Moshi Kotierk Richards Bay Prospecting
	IG-16 (Adjacent)	Moshi Kotierk Richards Bay Prospecting
	IG-13 (Adjacent)	Igloolik Tuniit Archaeological Project
	HB-06 (Adjacent)	Igloolik Tuniit Archaeological Project
WS-27 - Community Area of Interest – Ringed Seal Harvesting	IG-15	Moshi Kotierk Richards Bay Prospecting
	IG-16	Moshi Kotierk Richards Bay Prospecting
	IG-18	Moshi Kotierk Richards Bay Prospecting
WS-28 - Community Area of Interest – Sea-run Fish Harvesting	GF-64	Grise - Periglacial Geomorphology investigation study in permafrost
	HB-06	Igloolik Tuniit Archaeological Project
	IG-09	Kapuivik Archaeology Project

	IG-13	Igloolik Tuniit Archaeological Project
	IG-22	Moshi Kotierk Richards Bay Prospecting
	PI-11	Students on ice, Students on ice 2019 expedition (tourism)
	RB-01	Boothia-Somerset Geoscience Mapping, Eynos Hortense Kamaxitha (tourism)
	RB-02	Boothia-Somerset Geoscience Mapping, Eynos Hortense Kamaxitha (tourism)
	RB-12	Resolute evolution and environments of the earliest jawed fishes
WS-33 - Community Areas of Interest – Multiple Values:	HB-06	Igloolik Tuniit Archaeological Project
WS-37 - Community Area of Interest – Traditional Inuit Homes and Camps	IG-09	Kapuvik Archaeology Project

Appendix 2 – IOL Parcel Overlap with QWB Submissions

Submissions are adjacent to, and may impact, other IOL parcels. Please also note that this analysis is based on an initial assessment of QWB submissions, without using shapefiles, and includes only includes certain parcels with a higher degree of certainty of overlaps. Other overlaps may exists between IOL and the QWB submissions.

Submission	Submission Title	IOL Parcel Overlapped by the Submission – (number of overlapped parcels in brackets)
WS-05	Amendment Site 73, Igloolik	IG-09, IG-10, IG-11, IG-12 (4)
WS-07	Community Area of Interest - Caribou and Reindeer Harvesting	RB-24, GF-08, GF-37, GF-67, GF-68, GF-69, PI-10, PI-12, PI-03, PI-14, PI-07, PI-08, HB-01, HB-02, HB-03, HB-04, HB-15, HB-16, IG-14, SQ-05 (20)
WS-08	Community Area of Interest - Caribou Calving and Post-calving	GF-02, GF-03, GF-38, GF-42, PI-03, PI-16, PI-17, PI-41, PI-48, RB-02, RB-28, AB-32, AB-38, AB-41, AB-44, AB-52, LH-02, LH-05, LH-16, LH-18, CD-01, CD-02, CD-04, CD-05, CD-06, CD-21, CD-36, IQ-05, IQ-13, IQ-14 (30)
WS-10	Community Area of Interest - Caribou Migration Corridors	AB-58, AB-59, AB-43, AB-44, AB-02, AB-52, AB-45, AB-46, HB-06, HB-04, HB-08, HB-09, HB-10, HB-11, HB-12, IG-23, HB-01 (17)
WS-11	Community Area of Interest – Multiple Values Area - West Central Baffin Island	IG-01, IG-02, CD-01, CD-03, CD-37, CD-49, CD-50, IQ-35, IQ-36, IQ-37, PA-14, PA-16, PA-17, PA-18, PA-19, PA-23 (16)
WS-13	Community Area of Interest - Polar Bear Denning, Emergence and Mating	SQ-03, SQ-05, HB-14, HB-01, AB-58, AB-59, AB-60, AB-61, AB-62, AB-65, AB-66, AB-67, AB-68, AB-18, RB-08, RB-29, RB-30, RB-32, RB-15, RB-22, RB-12, RB-13, GF-08, RB-24, GF-07, GF-36, GF-33, GF-34, CR-20, CR-21, CR-22, CR-18, CR-19, CR-04, CR-15, CR-16, CR-17, CR-07, CR-01, CR-06, CR-08, BI-33 (42)
WS-15	Community Area of Interest - Eider Nesting Areas	RB-11, RB-31, PI-41, PI-40, PI-27, BI-29, BI-26, BI-22, PA-24, IQ-05, IQ-17, IQ-31, IQ-22 (13)

WS-17	Community Area of Interest - Seabird Areas	PA-24, PI-07, PI-08, PI-29, RB-09, RB-31 (6)
WS-19	Community Area of Interest – Beluga and Narwhal Harvesting	RB-02, HB-12, HB-11, IG-23 (4)
WS-20	Community Area of Interest - Admiralty Inlet	AB-37, AB-20, AB-28 (3)
WS-22	Community Area of Interest - Clearwater Beluga Calving and Post-Calving Area	PA-24 (1)
WS-23	Community Area of Interest – Kingnait, Bowhead Calving and Mating Area	PA-24 (1)
WS-24	Community Area of Interest - Cumberland Sound, Turbot and Beluga	PA-24 (1)
WS-26	Community Area of Interest – Bearded Seal Harvesting, Sanikiluaq	SQ-01, SQ-05 (2)
WS-27	Community Area of Interest – Ringed Seal Harvesting, Igloolik	IG-15, IG-16, IG-18, IG-19 (4)
WS-28	Community Area of Interest - Sea-run Fish Harvesting	AB-02, AB-03, AB-04, AB-41, AB-42, AB-44, AB-49, AB-52, AB-53, BI-10, BI-24, BI-25, BI-31, BI-32, BI-33, BI-37, CD-06, CD-13, CD-21, CD-22, CD-23, CD-24, CD-25, CD-29, CD-36, CD-39, CD-42, CD-43, CR-03, CR-04, CR-09, CR-12, CR-13, CR-15, CR-16, CR-18, CR-19, CR-20, CR-23, CR-28, GF-03, GF-19, GF-20, GF-31, GF-36, GF-37, GF-50, GF-64, GF-65, HB-04, HB-05, HB-06, HB-07, IG-09, IG-10, IG-13, IG-14, IG-22, IG-23, IG-25, IG-26, IQ-01, IQ-05, IQ-17, IQ-24, IQ-25, IQ-26, IQ-27, IQ-28, IQ-29, IQ-30, IQ-32, IQ-33, IQ-35, LH-01, LH-02, LH-03, LH-05, LH-06, LH-07, LH-10, LH-15, LH-16, LH-17, LH-18, PA-01, PA-03, PA-07, PA-10, PA-11, PA-12, PA-14, PA-20, PA-21, PA-22, PA-28, PI-03, PI-04, PI-05, PI-06, PI-10, PI-11, PI-12, PI-13, PI-14, PI-15, PI-19, PI-20, PI-21, PI-22, PI-24, PI-25, PI-30,

		PI-31, PI-33, PI-34, PI-35, PI-36, PI-37, PI-38, RB-01, RB-02, RB-08, RB-12, RB-13, RB-15, RB-21, RB-25, RB-26, RB-32, SQ-04, SQ-05 (132)
WS-29	Community Area of Interest - Landlocked Fish Harvesting Areas	CD-12, CD-13, CD-21, PA-20, PA-21, SQ-05, GF-36, RB-15, RB-22, RB-32, PI-19 (11)
WS-30	Community Area of Interest – Multiple Values Area, Iqaluit	IQ-05 (1)
WS-31	Amendment Site 10, Frobisher Bay	IQ-05, IQ-06, IQ-11, IQ-23 (4)
WS-32	Community Area of Interest – Multiple Values Area - Meta Incognita Kimmirut	LH-01, LH-02, LH-03, IQ-25 (4)
WS-33	Community Area of Interest - Multiple Values Areas, Hall Beach	HB-04, HB-05, HB-06, HB-02, HB-03 (5)
WS-34	Community Area of Interest - Multiple Values Areas, Grise Fiord	GF-01, GF-19, GF-20, GF-38, GF-39, GF-40, GF-41, GF-42, GF-43, GF-44, GF-49, GF-50, GF-51, GF-40, GF-41, GF-42 (16)
WS-36	Community Area of Interest - Multiple Values Areas, Resolute Bay	RB-32 (1)
WS-37	Community Area of Interest - Traditional Inuit Homes and Camps	IG-08, IG-04, IG-05, IG-06, IG-10, IG-12, IG-09, IG-14, IG-29, AB-54, AB-57, AB-55, AB-49, AB-51, AB-44, AB-45, AB-52, AB-43, AB-02, AB-40, AB-37, AB-34, AB-33, AB-27, AB-32, AB-38, AB-31, AB-30, AB-25, AB-24, AB-22, AB-05, AB-20, AB-03, AB-16, AB-08, AB-09, PI-37, PI-31, PI-34, PI-35, AB-39, AB-26, AB-23, AB-19, AB-17, AB-59, AB-60 (48)
WS-40	Community Area of Interest - Multiple Values Areas, Qikiqtarjuaq	BI-11, BI-12, BI-22, BI-25, BI-26, BI-27, BI-28, BI-29, BI-30, BI-31, BI-32, BI-33, BI-37, CR-01, CR-05, CR-06, CR-07, CR-08 (18)
WS-41	Community Area of Interest – Multiple Values Area, Markham, Hudson, Foxe	CD-04, CD-05, CD-06, CD-07, CD-08, CD-09, CD-10, CD-11, CD-12, CD-13, CD-14, CD-15, CD-16, CD-17, CD-18, CD-19, CD-20, CD-21, CD-22, CD-23, CD-24, CD25, CD-26, CD-27, CD-28, CD-29, CD-30, CD-

		31, CD-32, CD-33, CD-34, CD-35, CD-36, CD-38, CD-39, CD-40, CD-41, CD-42, CD-43, CD-44, CD-45, CD-46, CD-47, CD-48, LH-07, LH-13, LH-14 (47)
WS-42	Community Area of Interest – Multiple Values Area, Sanikiluaq	SQ-03, SQ-05 (2)
WS-43	Amendment Sites 18 and 37, Sanikiluaq	SQ-01, SQ-02, SQ-03, SQ-04, SQ-05, SQ-06 (6)