

example, there are differences in the information provided for migratory bird habitat and caribou designations between the documents that need to be clarified for our review of potential impacts of the land use proposals. There are also considerable challenges in using the electronic maps that are an essential component of the DNLUP 2021. To address these issues, NTI and the RIAs propose the following actions:

- NPC staff meet with NTI and the RIAs at the earliest possible time in order that questions on the content of the DNLUP 2021, Options and Recommendations documents and maps that are relevant to the ability of NTI and the RIAs to provide informed written submissions be answered; and
- NPC forward to NTI and the RIAs printed maps to facilitate a comprehensive review of the DNLUP 2021.

NTI and the RIAs recommend that NPC make printed copies of the DNLUP 2021 and the accompanying maps available to all participants, particularly community organizations in English and Inuktitut as soon as possible. The active and informed participation of Inuit in this process requires ready access to all relevant materials as set out in subsection 11.2.1 (d) of the *Nunavut Agreement* and necessitates the delivery of land use planning materials in both printed and electronic formats. We stress that the DNLUP 2021 and accompanying materials must be available in Inuktitut to facilitate Inuit participation in this review process.

There are additional process issues related to safeguarding Inuit oral participation at the regional public hearings that NTI and RIAs are raising that are of critical importance. We note that the NPC notice of July 23, 2021 requests that parties intending to participate in the regional public hearings submit their presentations and questions to the Commission or other parties by October 20, 2021. This direction suggests that the ability of Inuit to provide oral evidence and ask questions may be restricted at the regional public hearings. NTI and the RIAs are seeking confirmation from NPC that the public hearing procedures will support Inuit oral communication and decision-making in the conduct of the hearings as set out in the *Nunavut Agreement* by allowing Inuit participants to freely provide oral evidence and ask questions of all parties regardless of the written submissions they may have provided in advance of regional public hearings.

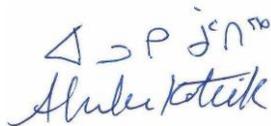
Concerns regarding protecting Inuit oral tradition and participation at NPC public hearings are not new. During and after the Qikiqtani Regional Public Hearing on the 2016 DNLUP (March 22 to 26, 2017), NTI and the RIAs raised concerns regarding lapses in meeting the requirement that Inuit oral tradition be respected and Inuit participation be promoted. Preserving Inuit oral participation at the regional public hearing is essential to a successful process and is in keeping with the governing principle in NPC's Public Hearing Rules that states that the Commission shall ensure that all activities undertaken are conducted in a manner that encourages Inuit participation and are respectful of Inuit culture and practices. Additionally, Rule 26 (1) supports participants asking any other participant relevant questions orally at a public hearing. The ability of Inuit participants to ask oral questions and make submissions in response to information presented at the regional public hearings is fundamental to facilitating a full understanding of the land use planning proposals and issues, as well as to ensuring that the record before the Commission is complete and reflects Inuit knowledge and priorities.

We also request that the October 20, 2021 deadline for presentation and written question be extended to support increased Inuit participation in this process. There is no question that the current deadlines will limit Inuit participation in the review of the DNLUP 2021. Additionally, the scheduling conflict, between NPC's regional public hearing from November 1-7 in Rankin Inlet/Thompson and the Nunavut Impact Review Board's (NIRB's) public hearing in Iqaluit scheduled for the same week for the review of Phase 2 Mary River proposal, creates another significant hurdle. NTI and RIA staff, as well as that of government and other participants are

required to actively participate in both processes. This scheduling conflict impedes active and effective participation of NTI, the RIAs and many other participants in two critical regulatory processes. Although NPC provided its notice before NIRB did so, NTI and the RIAs strongly recommend that the regional public hearing in Rankin Inlet/Thompson be rescheduled to allow for extended timelines for providing written submissions and questions that better serve all land use planning participants and that facilitates increased Inuit participation in the review of the DNLUP 2021.

I thank you in advance for considering our requests. The development of this first-generation Nunavut Land Use Plan is of great consequence to Inuit and I look forward to your responses.

Sincerely,



Aluki Kotierk
President

CC:
Stanley Anablak, President, Kitikmeot Inuit Association
Kono Tattuinee, President, Kivalliq Inuit Association
Olayuk Akesuk, President, Qikiqtani Inuit Association