



FRIENDS OF LAND USE PLANNING

October 8, 2021

Nunavut Planning Commission
P.O. Box 2101
Cambridge Bay, Nunavut
X0B 0C0

Attention: Nunavut Planning Commission

Re: 2021 Draft Nunavut Land Use Plan

Via email: submissions@nunavut.ca

Dear Nunavut Planning Commission,

On behalf of Friends of Land-Use Planning, we appreciate the opportunity to participate in the Nunavut Land Use Plan (NLUP) process, and we are grateful to the Nunavut Planning Commission (NPC) for considering our submission.

Barren-land Caribou are a critically important wildlife species for Inuit, Nunavummiut, and also for the Arctic ecosystem. Although the draft NLUP may not provide all the protections caribou need, we strongly support the habitat designation approach the plan takes.

Please find attached our submission, which presents a summary of the current knowledge about caribou as this relates to the NLUP. We agree with an overwhelming majority of Nunavummiut that have consistently supported stronger protection of caribou than is currently in place, as demonstrated through community consultations by NPC and other Inuit bodies, through statements in the Legislature and through public opinion polls.

We look forward to participating in the upcoming public hearings to respond to questions and concerns surrounding our submission.

Sincerely,

Paul Aarulaaq Quassa

Hilu Tagoona



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NUNAVUT PLANNING COMMISSION PUBLIC HEARINGS ON THE 2021 DRAFT NUNAVUT LAND USE PLAN

Friends of Land Use Planning

PRE-HEARING WRITTEN SUBMISSIONS

Filed by:

Hilu Tagoona, hilutagoona@hotmail.com
Paul Quassa, pquassa@hotmail.com

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The NLUP and Tuktu

- Barren-ground caribou (“tuktu” in Inuktitut) is the most important terrestrial wildlife food species, and every community in Nunavut has a history of depending on them.
- Tuktu have sustained Inuit in good times and have been the source of tragic starvations when they did not return in some years.
- Tuktu are also an important natural component of Arctic ecosystems.
- Although numbers have traditionally fluctuated over time, right now barren-ground caribou herds are at very low numbers (80-90% declines) throughout Nunavut.
- Tuktu also belong to the next generations and Inuit have taken very hard decisions in many communities to limit the harvest of tuktu.
- All caribou in Nunavut have been designated as being at some risk of extinction by the Committee on the Status of Endangered Wildlife in Canada, using internationally recognized criteria and Indigenous knowledge: Peary caribou in the High Arctic are “threatened,” as are all the barren-ground mainland herds, and the Dolphin and Union herd on the northwestern coast is now “endangered.”
- Although the reasons for tuktu declines in Nunavut are not absolutely clear, the ultimate factors that are driving the declines and disappearance of many mountain and boreal herds further south are well understood – habitat destruction made worse by climate change. This should provide lessons for Nunavut, now and in the future.
- The reasons for tuktu declines in Nunavut are thought to be some combination of changes in habitat (for example through climate change), industrial disturbance of tuktu and their habitat, and harvesting at times of population lows. These declines have all occurred relatively recently, over little more than a decade. These drastic reductions require actions that give tuktu the best chance of recovering.



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- In the past, the tuktu have always “come back” from population lows. However, historically tuktu have not faced the pressures they face today. There is a new danger of the herds not recovering as they have in the past. Sustained low calf production is a sign that the herds need more protection than ever.
- Also in the past, tuktu have proven to be a renewable resource worth tens of millions of dollars annually as a healthy food source. Sustaining the herds and their habitat is a vital part of economic and food security in Nunavut. Land use planning is the foundation of a number of necessary measures to safeguard tuktu. The NLUP must be in place before development decisions take away the option to conserve tuktu.
- Tuktu herds that have their key habitat areas (e.g., calving, wintering, and migration routes) in Nunavut are also economically and culturally important to other Indigenous peoples, especially the Dene of NWT, northern Saskatchewan and Manitoba, who have repeatedly called for protection of areas such as the calving grounds for herds upon which they too rely. Most of these calving grounds are located in Nunavut.
- The great migratory tundra herds of Arctic caribou are a nationally and internationally recognized natural symbol of Canada. A caribou bull appears on the Canadian quarter. In Canada, caribou have one of the last uninterrupted animal migrations in the world, on par with wildebeest, antelope, and some elephant herds. To lose Nunavut’s tuktu would be a community, regional, national and international tragedy.
- The goal of tuktu conservation should be to maintain the resiliency of the herds, by sufficiently protecting their habitats to ensure that tuktu populations can fluctuate under natural conditions.
- Although management plans for each herd are important, so far Nunavut’s territory-wide Caribou Strategy Framework relies on approaches such as temporary, herd-by-herd mobile caribou protection measures. These approaches may have some value in mitigating negative impacts of development on certain occasions, but they have not succeeded in reversing ongoing serious declines in caribou numbers.



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- Mobile caribou protection measures are time-limited, moveable, unproven and difficult to enforce. Identifying and designating areas such as calving grounds, post calving areas, freshwater crossings and key access corridors as “limited use areas,” as proposed in the 2021 draft of the NLUP, puts these areas clearly “on the map” right across Nunavut, as an anchor or starting point for other protection measures. During the negotiation of the Nunavut Agreement (where there is no mention of mobile measures), much emphasis was placed on “clarity” and “consistency.” The same approach should be taken to conserving tuktu.
- While there are no successful precedents for mobile caribou protection measures alone, there is at least one success story for the approach proposed by the 2021 draft NLUP. The Gwich'in of the NWT and Alaska have maintained the Porcupine herd by permanently protecting its calving grounds, coupled with self-generated harvest controls, in population highs and lows alike.
- The Government of Canada has strongly asked the United States protect the calving grounds of the Porcupine herd in the Alaska National Wildlife Refuge. Protecting key tuktu habitat in Nunavut through the NLUP should also be taken.
- Designating the full range of tuktu habitats year-round, for example calving grounds, migration routes, crossing sites and wintering areas, is important to ensuring that such habitats remain intact and not compromised when the tuktu come back to use them. Lingering infrastructure or habitat disturbance can effectively cut-off options for tuktu to re-use of such areas. The “limited use” as proposed by the 2021 NLUP is a necessary and effective tool to ensure that tuktu can return to areas they have once used.
- In addition to the provisions of the NLUP, a number of additional steps must be taken to support the recovery of Nunavut tuktu herds. For example:
 - All herds need to be more carefully monitored using Inuit Qaujimajatuqangit and scientific knowledge (i.e., regular surveys), with transparent and timely reporting of results.



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- A key uncertainty for tuktu is how mineral rights are going to be grandfathered in “limited use” zones.
- The draft NLUP makes way for a number of road corridors in conceptual stages. These future roads will open areas for development and have growth-inducing impacts by facilitating further development of tuktu habitat. The development of these roads must proactively consider cumulative effects before it is too late.

Conclusion

- Tuktu are inherently vulnerable and subject to dramatic population fluctuations, even under natural conditions. Most of Nunavut’s herds have survived over time, but their future is far from guaranteed, because now they face new pressures never faced before. The NLUP represents a consistent, fundamental starting point – an anchoring attempt across all herd ranges, to address these modern pressures. As such, the plan represents a necessary starting condition to conserve tuktu over the long term.
- Through community consultations by the NPC and other Inuit bodies, through statements in the Legislature and through public opinion polls, an overwhelming majority of Nunavummiut have consistently supported stronger protection of tuktu than is currently in place.
- It is important to get through this final consultation phase of the NLUP, and for the Government of Canada, the Government of Nunavut, and Nunavut Tunngavik Incorporated to approve the NLUP as soon as possible. Further delay is not a responsible option--for tuktu, or for Inuit.