

October 8, 2021

Andrew Nakashuk
Nunavut Planning Commission
P.O. Box 1797
Iqaluit, Nunavut X0A 0H0

Comments on the 2021 Draft Nunavut Land Use Plan

Dear Mr Chairperson

APEX Geoscience Ltd. (“APEX”) would like to provide the Nunavut Planning Commission (“NPC”) with the following comments on the latest Draft Nunavut Land Use Plan released in July 2021 (“2021 DNLUP”) as we feel the DNLUP is excessively onerous on the mineral exploration and mining industry which is a critical economic driver for the Territory of Nunavut. The mineral exploration industry is committed to working with governments, the Regional Inuit Associations, communities, HTO’s and other environmental and wildlife management boards toward the responsible development of the region’s vast natural resource wealth.

As a geological consulting company with 40 years of experience in Canada’s North and many clients who hold mineral tenure in Nunavut we are very concerned that the 2021 DNLUP essentially sterilizes large areas of land from exploration, regardless of the mineral potential. We are also concerned with the level of engagement of mineral exploration companies and associated service providers in the consultation process at higher levels through to community interaction – the process appears to have favoured other interests/groups for the direct community dialogue and excluded companies like ourselves and our clients. Implementation of the 2021 DNLUP and the consequent departure of mining and mineral exploration interests will have serious, detrimental socio-economic effects on Nunavut given that the mining sector is the largest private economic driver in the Territory.

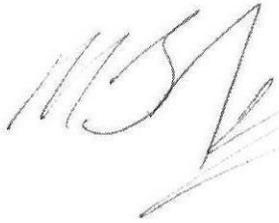
We would like to see geological studies completed over any proposed Limited Use Area (“LUA”) to ensure zones of high mineral potential are available for exploration, following the Mineral and Energy Resource Assessment (“MERA”) process which is implemented prior to the establishment of new National Parks in the northern territories as was completed prior to the establishment of the Ukkusiksalik National Park in 2003. High Mineral Potential lands need to be managed and prioritized for future mining opportunities. Specific areas of alarm currently impacted by proposed LUAs include the highly prospective Rankin-Ennadai belt and the areas between Bathurst Inlet to Kugluktuk and Chantry Inlet to Kugaaruk to name a few. These examples have seen significant historical exploration work which has suggested their mineral prospectivity but require further investment to fully outline mineral deposits and potential mines – this represents local investment, employment, and economic advancement along the entire timeline, and can be done in an environmentally responsible manner.

Land use planning should also consider appropriate mitigation measures for the potential impacts of mineral exploration and mining activities, including timing windows rather than sweeping sterilization in LUAs. As an example, Nunavut currently uses exclusion times for certain areas around the caribou calving season to ensure the safe and healthy delivery of off-spring and growth of herds.

Mineral exploration companies can explore anywhere in the world and weigh factors like geological prospectivity, personnel security, surety of investment, transparency of the land use and permitting process, exploration costs, etc into their exploration/investment decisions. The DNLUP 2021 coupled with the high cost of operating in the Canadian North is already deterring further investment by companies who have operated in Nunavut previously – attracting new investment will be very difficult. The historical mineral exploration undertaken in Nunavut has allowed for the establishment of many Nunavut-based and Innuit-owned businesses over the last 20 years who will also be adversely affected by the sweeping land sterilization contemplated by DNLUP 2021.

Mineral explorers want to work cooperatively with all stakeholders and know the importance of social, environmental and economic factors in resource development, particularly in sensitive areas like Canada's North but DNLUP 2021 will preclude the consideration of any of those things and lead to less research, funding, jobs, training, education, and stimulus for Nunavut.

Best regards,

A handwritten signature in black ink, appearing to read 'MBD', with a stylized flourish at the end.

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