



February 10, 2023

Andrew Nakashuk, Chair  
Nunavut Planning Commission  
P.O. Box 2101  
Cambridge Bay, Nunavut X0B 0C0  
Email: [submissions@nunavut.ca](mailto:submissions@nunavut.ca)

***Via Email***  
***submissions@nunavut.ca***

**Re: Filing of Wek'èezhì Renewable Resources Board's Final Written Comments for the Nunavut Planning Commission's 2021 Draft Nunavut Land Use Plan**

Dear Mr. Nakashuk,

Please find attached the Wek'èezhì Renewable Resources Board's (WRRB) final written comments for the Nunavut Planning Commission's 2021 Draft Nunavut Land Use Plan. The WRRB has provided its final written comments in English and Inuktitut. If you have any questions, please feel free to contact our office at (867) 873-5740 or [jpellissey@wrrb.ca](mailto:jpellissey@wrrb.ca).

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph Judas".

Joseph Judas  
Chair

Cc Goump Djalogue, Manager of Planning and Implementation  
Nunavut Planning Commission

Heather Sayine-Crawford, Director of Wildlife & Fish  
Department of Environment & Natural Resources, GNWT

Tammy Steinwand-Deschambeault, Director  
Department of Culture & Lands Protection, Tłıchǵ Government

Drikus Gissing, Director of Wildlife  
Department of Environment, Government of Nunavut

NUNAVUT PLANNING COMMISSION  
DRAFT NUNAVUT LAND USE PLAN

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Wek'èezhì Renewable Resources Board

FINAL WRITTEN COMMENTS

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Filed by:  
Jody Pellissey, Executive Director  
February 10, 2023

## *Wek'èezhìi Renewable Resources Board*

### *Final Written Comments the Draft Nunavut Land Use Plan*

As per Chapters 12, 13, 14 and 16 of the Tłıchǫ Agreement, the Wek'èezhìi Renewable Resources Board (WRRB) has a mandate for wildlife, plant, and forest management in Wek'èezhìi, and adheres to the principles and practices of conservation in fulfilling its duties. The Board is an institution of public government, which uses the best available Tłıchǫ and local knowledge, scientific information, and expert opinion to make balanced management decisions on an ecosystemic basis.

The WRRB requested participant status for the Draft Nunavut Land Use Plan (DNLUP) review on May 29, 2015. The Nunavut Planning Commission (NPC) confirmed the Board's standing on June 4, 2015. The WRRB submitted its formal written position on June 9, 2015. On November 15, 2016, the WRRB submitted two expert reports related to its 2016 Bathurst Caribou Herd Proceeding, and two expert reports related to its 2016 Bluenose-East Caribou Herd Proceeding. The reasons for decision reports responded to proposed harvest management actions and a proposed wolf feasibility assessment as well as to actions related to self-regulation, additional predator management actions, biological and environmental monitoring, and cumulative effects. The WRRB attended the NPC's public hearing in Iqaluit, NU, in March 2017. The Board has since held proceedings and provided management and monitoring actions for the Bathurst and Bluenose-East caribou herds in 2019 and 2021 as well as for wolf management in 2020.

The WRRB has interest in the highest form of protection for barren-ground caribou calving and post-calving grounds, as well as key access corridors and freshwater crossings, notably for the Bathurst and Bluenose-East herds that overlap both Nunavut and the Northwest Territories (NWT). Calving grounds are an area where no exploration or development should occur at any time, as they are significantly important for caribou ecology both spatially and temporally. The WRRB's interest is related to the potential transboundary effects of the DNLUP to the Northwest Territories through the DNLUP's potential impacts on migratory species, such as the barren-ground caribou. The Board notes that barren-ground caribou have been assessed as threatened by the Committee on the Status of Endangered Wildlife in Canada, which further emphasizes the importance of the DNLUP recognizing the importance of caribou calving and post-calving areas, access corridors, and freshwater crossings.

Tłıchǫ harvesters have been limited in their harvest of the Bathurst and Bluenose-East caribou herds since 2010 in order to allow the herds every opportunity to recover and increase in size. Activities on calving and post-calving grounds, access corridors, and freshwater crossings may put the herds at further risk and ultimately affect harvesting opportunities for Tłıchǫ and other Indigenous harvesters in NWT.

The WRRB notes that, in addition to barren-ground caribou, the DNLUP will also have transboundary impacts in the NWT on several species at risk that are of particular management concern, including peregrine falcons, short-eared owls, grizzly bears, and wolverine. Protecting key habitats and mitigating and monitoring potential impacts are a major concern for the conservation of species at risk. Under the *Species at Risk Act* (SARA) (s.79), species at risk are protected from the effects of development in that potential impacts are to be identified, mitigated, and monitored regardless of their level of significance. Best practices for considering wildlife at risk in environmental impact assessment suggest that COSEWIC listed species be treated in a similar fashion to species listed under SARA.

It is the WRRB's position that the Bathurst and Bluenose-East calving and post-calving grounds, as well as key access corridors and freshwater crossings, should be areas where no exploration or development

occurs at any time, as those areas are of the utmost importance to the health and sustainability of both herds. Impacts to key habitats for species at risk such as peregrine falcons, short-eared owls, grizzly bears, and wolverine are also of concern, and management of critical areas must offer the highest degree of protection to these species as well as ensuring all appropriate mitigative measures are implemented. The Board wants to ensure that the implementation of the DNLUP addresses the Board's barren-ground caribou and species at risk concerns, as these concerns highlight transboundary issues that impact the NWT.

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ጥቅም 10, 2023

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