



**CANADIAN  
NORTH  
RESOURCES INC.**

February 9, 2023

Jonathan Savoy  
Nunavut Planning Commission  
P.O. Box 2101  
Cambridge Bay, NU X0B 0C0  
Email: [jsavoy@nunavut.ca](mailto:jsavoy@nunavut.ca)

Dear Jonathan Savoy,

**RE: Canadian North Resources Inc. Final Written Submission**

Canadian North Resources Inc. (CNRI) thanks the Nunavut Planning Commission (NPC) for the opportunity to provide this final submission on the Draft Nunavut Land Use Plan (DNLUP). This final submission restates previous concerns raised by industry members and proponents through their written and verbal submissions to the Commission.

CNRI holds the Ferguson Lake Ni-Cu-Co-Pd-Pt Project located in Kivalliq, Nunavut situated approximately 190 km south of Baker Lake.

CNRI understands that developing projects in Canada requires adherence to some of the most stringent environmental requirements in the world and uses Inuit Qaujimajatuqangit (IQ), rigorous scientific investigations, and leading-edge engineering methods and technologies to develop projects that generate social and economic benefits while protecting the environment.

**DNLUP Removes High Mineral Potential Land from Development**

We at CNRI realize the tremendous untapped mineral potential and the world class opportunity of Nunavut. The Ferguson Project encompasses a major Critical Minerals mineral deposit containing 24 Mt Indicated Resource grading 0.85% Cu, 0.60% Ni, 0.07% Co, 1.38g/t Pd and 0.23g/t Pt plus 47.2 Mtn Inferred Resource grading 0.91% Cu, 0.53% Ni, 0.06% Co, 1.4g/t Pd and 0.25g/t Pt. CNRI was encouraged by the Government of Canada's recent release of the Critical Mineral Strategy (2022) suggesting the sustainable extraction and production of Critical Minerals necessary and supportive of Canada and its position as a leader in the low-carbon economy.

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As a mining project in advanced exploration, our existing leases and claims are located in the post-calving caribou summer and late summer area. We must evaluate the consequences of the adoption of the currently worded DNLUP on project consistency and feasibility.

The DNLUP does not protect our existing rights. Grandfathering can only be effective if it protects the concept to mine and allows the associated design flexibility beyond linear infrastructure and impartial to a particular mine component or footprint. As noted by others, maintaining design flexibility is an integral part of the project assessment process. It allows for the adaptation to changing conditions, new information or incorporation of new technologies.

Our company has existing leases and claims and must now evaluate the heavily worded DNLUP and the consequences that the plan may have on our project and its feasibility. We recommend the NPC be clear on their grandfathering terms and ensure that it provides CNRI the confidence to sustain and advance our existing mining leases and claims.

### **Recommendation - Utilize Policy Option #4**

It is recommended that the NPC prioritize use of Land Use Policy Option 4 outlined in the 2021 Options and Recommendations to provide clear guidance to Inuit landowners and Institutes of Public Governance (IPG's) in the valued components associated with land use in specific areas for this first-generation plan. By identifying spatial-linked valued component sensitivities, this information would have the advantage of providing clear and effective inputs and allow for a comprehensive co-management of the existing and effective systems such as the NWMB, NIRB, NWB, Wildlife Act, and RIAs to fulfil their obligations as outlined by the Nunavut Agreement.

In this first-generation plan, limited and conditional use designations should be restricted to situations where these designations are absolutely necessary and evidently able to attain the intended benefits, and where no other option would produce the desired outcome.

We also recommend that any future changes be informed by scenario analysis and modelling, including evaluation of economic impacts, to support well informed land use decisions that fully consider changing demographics and future social and economic needs. The NPC should also publish all environmental values gathered to date, both as a guide to land users and managers but also to facilitate plan improvements and designation revisions going forward. This will help inform IPGs, land managers and resource developers what's important and the actions required by all to protect valued ecosystem components.





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### **In Summary**

We recommend the NPC reflect on the direction initially provided to them, namely to:

- a) achieve an appropriate and flexible balance of economic, cultural and conservation interests, recognizing the interdependence of these values;
- b) work effectively as an integral part of an overall regulatory system as laid out in the Nunavut Agreement and enabling legislation, and provide guidance to other institutions of the regulatory process, including impact review and land and water licensing; and
- c) be implementable, and guide and support government departments and agencies in the delivery of their mandates within the regulatory system.

Such a reassessment could also ensure:

- 1. The Plan is aligned with other provisions of the Nunavut Agreement,
- 2. Allow Nunavut to fulfill a meaningful and deepening role within Canada,
- 3. Respect private property rights,
- 4. Respect the results of IPG and Inuit land management processes,
- 5. Promote evidence-based caribou management,
- 6. Meet the needs of Nunavut's youth, and
- 7. Aid and trust land managers in making value-based decisions.

Based on the concerns and apparent miss-alignment with direction provided by the Signatories, the CNRI does not support the 2021 DNLUP.

We support the position of the GN and RIAs that the DNLUP is unsupportive of the economic trajectory that Nunavut is aiming for post Devolution. The general support for the adoption of Option 4 allows for required designations to be implemented on a case-by-case basis by the respective regulatory bodies, is workable within an evolving economic environment, and is well suitable for a first generation land use plan.



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Again, we thank you for providing us with this opportunity to comment and contribute to this historically important document and process for Nunavut.

Sincerely,

Trevor Boyd  
Vice President Exploration  
Canadian North Resources