



February 9, 2023

Nunavut Planning Commission (NPC)
P.O. Box 2101
Cambridge Bay, NU X0B 0C0
Attn. Jonathan Savoy
Via email: jsavoy@nunavut.ca
Cc Via email: submissions@nuavut.ca

RE: North Arrow Minerals Final Written Submission with respect to the 2021 Draft Nunavut Land Use Plan (2021 DNLUP)

Dear Mr. Savoy,

North Arrow Minerals supports the development of a Nunavut Land Use Plan and thanks the Nunavut Planning Commission (NPC or the Commission) for the opportunity to continue as a participant to the planning process, including provision of this final submission on the 2021 DNLUP. This final submission restates the comments and concerns raised in our previous October 8, 2021 submission on the 2021 DNLUP, as well as a number of concerns raised by industry members and proponents through their written and verbal submissions to the Commission.

North Arrow maintains mineral tenure in all three regions of Nunavut, with a primary focus on diamond exploration, including its advanced stage Naujaat Project located on Commissioner's Land near the hamlet of Naujaat, Kivalliq Region, as well as the CSI, Hope Bay and Hammer Projects in the Kitikmeot Region, and the Luxx and Mel Projects in the Kivalliq and Qikiqtani Regions, respectively. North Arrow became a formal Participant in the land use planning process in September 2016, after the 2016 DNLUP was released.

As noted above, North Arrow restates the specific concerns and recommendations included in our October 8, 2021 submission, particularly as they relate to **Existing Rights** and **specific comments related to North Arrow's Naujaat Project**, and the uncertainty related to the size, location and boundaries of polygons used to define Limited Use areas related to caribou calving and post calving grounds.

Additional comment on Existing Rights

The DNLUP does not protect our existing rights. While the Commission maintains that it is in support of economic development in Nunavut, limiting expansion in restricted areas to existing project footprints effectively restricts the evaluation process and adds uncertainty that will make further investment too

risky in some cases. This will undoubtedly result in the abandonment of some projects as it will inhibit development of supporting linear infrastructure and associated flexibility of design. As noted by others, maintaining design flexibility is an integral part of the project assessment process, by allowing for adaption to changing conditions, new information or incorporation of new technologies.

If the 2021 DNLUP is approved as currently drafted, North Arrow will need to evaluate the consequences that the plan may have on our exploration projects in Nunavut and the feasibility of continuing with further investment. We recommend the NPC be clear on their grandfathering terms and ensure that it provides North Arrow with the confidence to sustain our existing claims.

Comment on the intersection of Canada's Critical Minerals Strategy (2022) with previously defined mineral potential

In North Arrow's submission to the NPC dated July 2017, **we recommended that the NPC and the plan should acknowledge that the level of geoscience knowledge in Nunavut is limited and that, over time, geological concepts used to identify areas prospective for discovery of mineral deposits can change.** At the time, we used the discovery of diamonds in the Lac de Gras area of the NWT as an example that geologists do not always know where areas of 'high mineral potential' are located.

We now have a present-day, real-time example of the need for caution with the release, by the Government of Canada, of its Critical Minerals Strategy (2022). The Strategy outlines Canada's vision for sustainable extraction and production of the Critical Minerals needed to support Canada and its position as a global leader in the emerging low-carbon and green economy. Many Critical Minerals are not found in traditional rock formations and geological settings, and they require new, flexible exploration approaches. **Frankly, the concept of Critical Minerals is so new that it was not a consideration when Government completed its scans of areas of high mineral potential in Nunavut as part of this land use planning process.** Development of Canada's Critical Minerals Strategy should reinforce the need for the final Nunavut land use plan to allow for flexibility in identifying prospective areas for mineral exploration or Nunavut risks missing out on future private sector economic development opportunities. Proceeding with a less prescriptive approach like our recommendation below to utilize Policy Option 4, is a reasonable way to achieve this flexibility.

Recommendation – Utilize Land Use Policy Option #4

Similar to the 2016 DNLUP, the 2021 DNLUP is overly reliant on extensive land use prohibitions as a planning tool. An effective, truly incremental first-generation land use plan should provide broad guidance for land use decisions in the territory and allow Nunavut's co-management regulatory system with its embedded social, environmental, and economic reviews to provide a balanced approach to land use in the territory. Projects necessarily go through substantial modification between exploration, development, and reclamation, and are presented in a highly conceptual way to allow the Nunavut Impact Review Board (NIRB) to determine what potential valued components should be considered during the development of impact statements and when implementing project specific conditions. Extensive land use prohibitions,

as proposed in the 2021 DNLUP, may prove ineffective at producing the desired outcomes and are likely to prevent the establishment of a robust private sector, including a sustainable mineral exploration and mining industry. A better approach would include **use of Land Use Policy Option 4 outlined in the 2021 Options & Recommendations document, to provide clear guidance to regulatory authorities in the valued components associated with specific project proposals.**

Use of Land Use Policy Option 4 would 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 land use 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 instruments such as the Nunavut Wildlife Management Board, Nunavut Impact Review Board, Nunavut Water Board, Nunavut Tunngavik Inc., and Regional Inuit Associations to fulfil their obligations, with input from directly impacted communities, 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 to the Nunavut Land Use Plan 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 IPG's, land managers and resource developers what is important, and the actions required by all to protect valued ecosystem components.

Closing

We recommend the NPC reflect on the direction initially provided by the land use plan Signatories in their December 6, 2016 letter, that the final plan should aim 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 should also ensure the plan supports:

1. Alignment with other provisions of the Nunavut Agreement,
2. Nunavut's ability to fulfill a meaningful and deepening role within Canada,
3. Respect for private property rights,
4. Respect for the results of IPG and Inuit land management processes,
5. Promotion of evidence-based caribou management,
6. The needs of Nunavut's growing population, and
7. Land managers in making well-informed value-based decisions.

We support the position of the GN and RIA's that the DNLUP does not align with the economic trajectory that Nunavut is aiming for with Devolution. We support the application of Land Use Policy Option 4 to support existing regulatory processes and allow for any required designations to be implemented on a case-by-case basis. This approach is appropriate for a first-generation land use plan within an evolving economic environment. Based on our outlined concerns and the apparent miss-alignment of the draft plan with direction provided by the Signatories in their December 6, 2016 letter to the NPC, North Arrow does not support the 2021 DNLUP as drafted.

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

Sincerely,

North Arrow Minerals Inc.

Per:



Ken Armstrong, P.Geo.(NWT/NU)
President & CEO