



## Wildlife, Lands and Environment Department

Łútsël K'é Dene First Nation  
P.O. Box 28  
Łútsël K'é, N.T.  
X0E 1A0

Telephone: (867) 370-3820 x1002  
Fax: (867) 370-3143

10 February 2023

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

Via e-mail: [submissions@nunavut.ca](mailto:submissions@nunavut.ca)

Dear Chairperson Nakashuk:

Please accept this submission to the Nunavut Planning Commission (NPC) on behalf of the Łútsël K'é Dene First Nation (LKDFN) as our comments and recommendations on the Nunavut Draft Land Use Plan (NDLUP).

LKDFN would like to acknowledge the authority of the Inuit to make decisions on the land that they have used to sustain themselves since time immemorial, and acknowledge the relationship that the Łútsël K'é Dene have had with the Inuit, especially in regards to our collaboration with respect to the Thelon Game Sanctuary.

In our territory, we have witnessed the collapse of the Bathurst Caribou herd, with a grim outlook on the survivability of this collapse. LKDFN submitted a letter earlier on in the process in 2014 urging the NPC to heavily consider the importance of caribou to our livelihoods and way of life in Łútsël K'é. The caribou situation then was not positive and is even worse now. 9 years later LKDFN is encouraged to see that the NPC has taking the recommendations from various parties on the importance of caribou habitat seriously and has proposed measures and limits to development in these importance and critical caribou habitats.

As active participants in the Beverly and Qamanirjuaq Caribou Management Board (BQCMB), we hold many of the same ideals and recommendations, as that organization and ours hold a responsibility to speak for the caribou in discussions like these. LKDFN would like to lend our support for the following considerations for caribou:

- **Protections for key access corridors to and from the calving and post-calving grounds be extended on both ends of the proposed timelines**
  - Protecting pregnant caribou on their way to the calving grounds if a priority, as well as protection of calves early in their life, anything to limit disturbance at this critical time would be beneficial
  - Extending timelines may also preempt future changes by taking the changing climate into consideration, it may be that the migrations to or from the calving grounds change with earlier spring or fall



## Wildlife, Lands and Environment Department

Łútsël K'è Dene First Nation  
P.O. Box 28  
Łútsël K'è, N.T.  
X0E 1A0

Telephone: (867) 370-3820 x1002  
Fax: (867) 370-3143

- The already approved Keewatin Regional LUP has identified May 15 to July 15 for protection of important caribou areas, it may be wise to start protections at that date range and study if they need to be longer
- **Protecting actual land areas is a crucial step to protecting caribou herds.**
  - Mining industry and advocates will state that current regulatory instruments are enough for protecting caribou. LKDFN would like to put forward that this is not true. We have watched industry rely on these instruments in our territory while some caribou populations have all but collapsed under these “protections.” The physical disturbance is the main problem that cannot be lessened by mitigative measures, the disturbance itself must be prevented.
  - It is unwise to rely on unproven protection measures like mobile conservation zones, though if proven effective, they may have a place in future caribou protection activities. In our experience, these are last ditch efforts to protect what is left of the herds, they are not to be relied upon as effective protection.
- **LKDFN supports the designation of year-round prohibition on land use activities in the Thelon Wildlife Sanctuary**
  - The Thelon holds a special place in LKDFN history, as well as a significant place in ecological history. It is important that it remains protected.
- **LKDFN does not support the grandfathering of existing mineral claims in Limited Use areas.**
  - Limited Use is the highest level of protection, and though LKDFN has not seen maps of existing mineral claims in these areas, if the NPC and all participating parties have identified critical areas as Limited Use, it their protection, and not mineral interests, is the primary goal according to the plan. Again, avoiding the disturbance is the only way to ensure that the area is protected.

LKDFN would like to acknowledge all of the work that NPC has done over the last many years in preparing this plan, and for the consideration they have given to all comments received. It is a challenging effort with a great many interests no doubt. In order for the land and wildlife to continue to provide for the people that have relied on it for generations, it is important these days to have strong plans for protecting large areas. Without these areas and designations, anthropogenic disturbances will continue to creep in and slowly impact the land in often irreversible ways.

LKDFN is supportive of the long way that this plan has come and encourages the NPC to continue their good work. The Nunavut Territory is large, and the areas that we seek to protect for caribou are relatively small in comparison. There will be a great deal of land available for resource development, and we hope that the wishes of industry to have more land available with fewer restrictions is met with a precautionary approach of limiting access to land that caribou need to survive. This planning effort is about balancing the needs of all land-users, though LKDFN believes that the people who have used the land the longest and rely on it for



## Wildlife, Lands and Environment Department

Łútsël K'é Dene First Nation  
P.O. Box 28  
Łútsël K'é, N.T.  
X0E 1A0

Telephone: (867) 370-3820 x1002  
Fax: (867) 370-3143

survival should have preferential treatment over the ones who use it for exploitation and disturbance.

We trust in the people of Nunavut to guide this final document, and thank the NPC for hearing the concerns of the Dene people in Łútsël K'é.

Sincerely,

Tas-Tsi Catholique  
Wildlife, Lands and Environment Manager  
Łútsël K'é Dene First Nation

CC:  
Chief Marlowe – LKDFN  
Earl Evans – Chair, BQCMB