



Notice of Draft Template for Written Submissions for the Public Hearing on the 2016 Draft Nunavut Land Use Plan (DNLUP)

Date: October 25, 2016

The Nunavut Planning Commission (NPC) encourages participants to use a common template for their written submissions on the DNLUP, to be provided in advance of the Public Hearing that is scheduled for March 2017. This Notice includes the NPC's draft template for submissions. Participants are invited to send any comments on this draft to NPC by November 10, 2016. NPC will issue a final version of the template once it has reviewed the comments on this draft.

The template is designed to help participants organize their comments and provide the type of information that will assist the Commissioners when they make decisions about proposed revisions to the DNLUP after the Public Hearing. Use of a common template will make it easier for NPC and all participants to identify the issues that will be raised at the Public Hearing and to compare the analysis, options and recommendations that will be included in the large number of detailed submissions that the NPC expects to receive.

The template could be completed as a stand-alone submission or it could be used to summarize or supplement material included in another format as part of a larger submission. Participants may decide to use all of the template or only part of it, depending on the content of their submissions. The template could also be used for joint submissions when two or more participants identify issues of mutual concern and have a common analysis and set of recommendations. These multi-participant submissions could demonstrate the extent of consensus about recommendations and could also assist the Commissioners, NPC staff and other participants in understanding the range of perspectives, interests, options and recommendations to be considered on contentious issues. All submissions will be part of the record for the Public Hearing and will be available on the NPC website.

The template is adapted from comments on the final draft version of the Sahtu Land Use Plan (NWT) submitted by the approval parties in 2013. These comments are available on the website of the Sahtu Land Use Planning Board (<https://sahtulanduseplan.org/keypoint/final-draft-approval-parties-2013>) and provide a useful illustration of the type of submissions that participants may wish to prepare for the Public Hearing on the DNLUP.

The description of the template in this Notice includes the section headings in bold type, followed by brief explanations of the intended content. A blank version of the final version of the template as a Word document will be available for download on the NPC website.

To provide comments, or for other related information, please contact:

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**NUNAVUT PLANNING COMMISSION – PUBLIC HEARING ON THE 2016 DRAFT NUNAVUT LAND
USE PLAN**

[PARTICIPANT NAME]

PRE-HEARING WRITTEN SUBMISSIONS

Filed by:

[REPRESENTATIVE NAME – if other than Participant]

[DATE OF FILING]

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[Name of Participant(s)] Submission for the Public Hearing on the 2016 Draft Nunavut Land Use Plan

[Date]

- 1. Background and Objectives** – Introductory comments on topics such as the participant's involvement in the planning process to date, its broad perspective and specific interests relating to the DNLUP, who it represents, and the process used and information relied upon to develop its submissions.
- 2. General Comments and Recommendations** – Observations on general characteristics of the DNLUP, the extent to which it meets broad criteria for acceptability to the Participant and in the context of the Nunavut Land Claims Agreement, the *Nunavut Planning and Project Assessment Act* and the NPC's Broad Planning Policies, Objectives and Goals (2007), and any important over-arching issues for the DNLUP along with recommendations for addressing them. Participants may challenge, comment on, or supplement the DNLUP in these submissions and accompanying documents. In addition to addressing any over-arching issues of concern to participants, this section could also be used to identify aspects of the DNLUP that participants support. Participants may want to indicate their support for provisions and concepts, including a rationale, to ensure that Commissioners receive the full range of views on aspects of the DNLUP where other participants may recommend changes. This section could be divided into sub-sections on topics such as:
 - 2.1.** Overall structure and clarity of the DNLUP;
 - 2.2.** Consistency with the applicable legal requirements and policy context;
 - 2.3.** Fit with the integrated regulatory system;
 - 2.4.** Quality of the planning process;
 - 2.5.** Incorporation of input from participants in the planning process;
 - 2.6.** Overall balance among competing interests on important issues;
 - 2.7.** Governance and implementation;
 - 2.8.** ...

A more comprehensive list of issues that may be addressed in this section of the template for submissions, or in detailed comments in subsequent sections of the submissions, was included for discussion purposes in the Agenda for the Pre-Hearing Conference held in Iqaluit on September 27-29, 2016 (Preliminary Draft – Formulation of Issues). This list in no way constrains participants' issue identification for the Public Hearing or the questions, comments, submissions or other evidence that may be put before Commissioners, but may be helpful to both assist participants organize submissions, and to enable the Commissioners to more effectively consider all participants' individual positions on specific issues.

- 3. Specific Comments and Recommendations** – Observations on issues where the submission includes more detailed comments, analysis and specific recommended changes to the DNLUP, organized as follows:
 - 3.1.** [Issue #1]
 - 3.1.1. Reference in DNLUP** – Page number, section number.
 - 3.1.2. Comment** – Brief summary of the issue.

3.1.3. Recommendation(s) – Specific changes suggested for the DNLUP, including where possible the exact wording to be deleted or added.

3.1.4. Rationale – More detailed description of the participant’s concerns with the way the DNLUP addresses the issue, including the analysis of existing wording and its implications and an explanation of the reasons for the recommended changes. This section could include a discussion of options for addressing the issue and a justification of the participant’s preferred option. In particular, it could explain how the recommendation accommodates the interests of other participants in the planning process and what important principles, values, interests and trade-offs the Commissioners should consider when deliberating on this issue. Participants may choose to relate their rationale to specific sections of the Nunavut Land Claims Agreement and the *Nunavut Planning and Project Assessment Act* that provide for land use plan requirements, as well as the NPC’s Broad Planning Policies, Objectives and Goals (2007).

3.1.5. Note(s) – Any other relevant information relating to this issue, such as cross-references to other sections of the DNLUP where the issue arises or that might be affected by the recommended changes.

3.1.6. Supporting Material – Refer to other relevant information in the participant’s submissions or to other documents in the record for the Public Hearing. Participants’ submissions must cite each linguistic version of documents filed with the NPC.

3.2. [Issue #2]

3.2.1. ...

4. Editorial Recommendations and Considerations – Identification of wording in the DNLUP where minor editorial changes are recommended for legal certainty and consistency or for additional clarity. Include specific recommended wording (with track changes) using the following table:

Page #	Description, Recommendation and Rationale
P. x	<u>Section A.B</u> – Insert specific wording. Recommendation – Insert proposed new wording with track changes. Rationale for change – Brief explanation of issue and the rationale for the proposed editorial change(s).
P. y	<u>Section C.D ...</u>