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January 25, 2019

Serving the  
communities of

Sharon Ehaloak  
Executive Director  
Nunavut Planning Commission  
P.O. Box 1797  
Iqaluit, Nunavut, X0A 0H0

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Arctic Bay

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Cape Dorset

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Clyde River

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Grise Fiord

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Hall Beach

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Igloolik

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Iqaluit

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Kimmirut

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Pangnirtung

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Pond Inlet

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Qikiqtarjuaq

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Resolute Bay

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Sanikiluaq

**Re: Inuit Consultation on Land Use Planning, Caribou and IOL**

Dear Ms. Ehaloak,

Qikiqtani Inuit Association (QIA) is pleased that we are able to make this submission on the written record for the 2016 version of the Draft Nunavut Land Use Plan (DNLUP). However, this submission does not represent QIA's full position on these issues but is driven by today's deadline set by NPC. This letter seeks to provide an interim response of limited scope highlighting certain key issues.

QIA is aware the revision process for the next DNLUP has not yet been announced. QIA has not been informed what will happen with the 2016 DNLUP, and how submissions received in December 2018 and January 2019 will be treated. QIA would welcome an opportunity to properly review, consider and comment on the recent submissions, particularly those from the Qikiqtaaluk Wildlife Board (QWB).

Community Consultation

Inuit are very concerned with effective and responsible land use planning in Nunavut. QIA has consistently taken the position that Inuit need to be at the forefront of the DNLUP drafting process through effective and adequate consultation with Inuit in communities. Community consultation should prioritize informed participation and culturally appropriate methodology. Any work on the next revision of the DNLUP should prioritize Inuit engagement at the community level, including NPC returning to communities, to ensure Inuit land use and Inuit Qaujimajatuqangit (IQ) are properly integrated into a revised DNLUP.

### Caribou

QIA is concerned with the absence of protective designations for Qikiqtani caribou in the 2016 version of the DNLUP. We recognize that information about caribou populations for this region is limited relative to the mainland herds, however, information exists in both western science and IQ-based forms. What is known about caribou in the Qikiqtani region supports the understanding they are subject to different environmental conditions and their behavioural ecology can be quite different from that of the mainland caribou herds. Recognizing the ways in which they are distinct warrants a distinct approach to protection for Qikiqtani caribou.

QIA wishes to reiterate its support for regionally developed land use restrictions, caribou protection and mitigation measures. QIA believes available information should be used to develop distinct designations and protection measures for caribou in the Qikiqtani region during any subsequent DNLUP revision process. In doing so, IQ must be treated with at least equal weight as western-science and cannot be disregarded when it is the only source of information available.

In December 2018, QWB made a significant submission to NPC. QIA has not had adequate time to review and respond to the QWB's submissions. Due to the importance of this new information, including considerable IQ not previously submitted to NPC, QIA considers it would be appropriate for NPC to provide stakeholders like QIA more opportunity to respond.

### IOL Designations

QIA wishes to restate our concern with land use designations that implicate Inuit Owned Land. QIA has a mandate to ensure IOL is managed according to Inuit goals and objectives. While the DNLUP process applies to IOL, NPC should not disregard Inuit decision-making authority or consideration that informed the IOL land selection process when the Nunavut Agreement was negotiated. QIA requires a reasonable opportunity to review and respond to any proposed land use restrictions that affect IOL.

We appreciate the opportunity to participate in the development of the DNLUP as well as the NPC's efforts to complete it. QIA is committed to advocating for Inuit interest, rights and IOL.

Sincerely,



Jeremiah Groves  
Executive Director

CC: Kilikvaq Kabloona, CEO, Nunavut Tunngavik Inc.