

Comment ID	Organization Name	Date of Submission	Document Referenced	Section Referenced	Theme of submission or Location/ID# Referenced	Comment	NPC Response	Comment #2	NPC Response #2
GOC-1	Aboriginal Affairs and Northern Development Canada (AANDC)	18/07/2013	DNLUP	Ch. 1, 7	Terminology	A general comment that applies to a number of sections of the DNLUP, and mostly Chapters 1 and 7, is the use of a number of terms that are either: i) not defined, ii) appear to be interchangeable, iii) not consistent with those used in the Nunavut Planning and Project Assessment Act, or iv) are simply unclear as to their meaning and application within the plan. It is imperative that the use of these terms are consistent throughout the document and do not differ from those used in governing documents and legislation (the Nunavut Land Claims Agreement (NLCA) and NUPPAA). For example, the DNLUP's use of "Project" is inconsistent with NUPPAA, which refers to "Project Proposals". "Terms" is defined as "the set of administrative requirements" but the "administrative requirements" are not defined nor presented in the DNLUP. "Criteria" seems to be interchangeable with "terms" or at least is confusing as to the use and meaning.	NPC has gone through and revised terminology to ensure consistency throughout the document as well as with the NLCA and NUPPAA.		
GOC-2	Aboriginal Affairs and Northern Development Canada (AANDC)	18/07/2013	DNLUP	1.3.1	Purpose of Plan	AANDC supports the findings and recommendations of the Independent Review of the Draft Nunavut Land Use Plan (Independent Review) confirming that the overall "vision" and the purpose of the plan, as well as its intended effect must be better defined (see pgs. 73-74 of the Independent Review). AANDC considers this to be a critical first step for the plan's revision.	The Commission believes that the steps for advancing the in plan and planning process are identified in the Recommendations of the Independent Third Party Review. The Commission has implemented all of the Recommendations identified in the ITRP. We note however that the Vision was not one of those key Recommendations. Regardless, Chapter 1 provides the content to explain "why the plan is needed, what it intends to accomplish, and how it will make a difference" in accordance with the ITRP comment.	AANDC and other Federal departments and agencies would welcome the opportunity to discuss the topic of a "vision" for the NLUP with NPC.	In the absence of clear feedback, NPC has considered revisions to the vision statement.
GOC-3	Aboriginal Affairs and Northern Development Canada (AANDC)	18/07/2013	DNLUP	1.3.2	Methodology	1.3.2 Methodology The methodology section needs strengthening to assist in the comprehension of the plan. As per the suggestions made in the Independent Review (pgs. 74-75), the following are some topics that should be discussed in the DNLUP: 1. Plan development process 2. Plan's role in the integrated regulatory system 3. Input received and how this input has been incorporated 4. Plans approach to Permitted and Prohibited Uses (7.8), Land Use Designations and Recommendations and Generally Permitted Uses, and 5. Processes to be used for plan implementation and periodic review	The Plan has been revised to address the suggestions. Chapter 1 provides a more thought discussions of the plan development process, an integrated regulatory system. The land use designations have been simplified to focus on key areas of concern. The Implementation Strategy has been revised to provide a fuzome outline of the processes used to implement the Plan.	AANDC would welcome the opportunity to discuss this topic further with NPC. As contemplated in NUPPAA, AANDC sees the NLUP as crucial to enhancing the existing integrated regulatory system in Nunavut by providing an effective and certain regulatory regime. The effectiveness of the NLUP is dependent on the plan's consistency with legislation. Its ability to clearly describe and inform users of conformity requirements and adequately incorporating concerns and values of Nunavut residents and stakeholders. The NLUP should provide an early filter (conformity determination phase) on project applications. When projects are found to be out of conformity with the plan these applications are stopped before the project screening phase.	NPC has revised the plan to ensure consistency with legislation in the NLUP.
GOC-4	Aboriginal Affairs and Northern Development Canada (AANDC)	18/07/2013	DNLUP	1.3.2.2	Consultations	The first two paragraphs of this section do not belong in a land use plan. They do not add value to the objectives, purpose and intended effect of the plan.	NPC has revised and removed the paragraphs.		
GOC-5	Aboriginal Affairs and Northern Development Canada (AANDC)	18/07/2013	DNLUP	1.3.3	Plan Content	In AANDC's view, the section on plan content should provide more information on each chapter. Interpreting the plan would be clearer if a simpler framework for Land Use Designations was used. Current designation types (e.g. Protecting and Sustaining the Environment) contain variable levels of permitted and prohibited uses which add to the complexity of the draft plan. AANDC recommends simplifying Land Use Designations as much as possible by reducing the variability within each designation. This could be achieved through the regrouping of Land Use Designations by their permitted and prohibited uses. (see Section 2: Environment Canada). For the plan to be effective there is a clear requirement to introduce the Land Use Designations with an explanation that clearly and unambiguously describes the purpose, rationale, permitted and prohibited uses and any associated terms and conditions. The Independent Review provides considerable guidance that helps clarify the difference between NPC's zoning approach and those used in other northern regional plans. Considering that some of the eventual users of the NLUP are familiar with the other northern plans (particularly industry), further explanation in the DNLUP would result in a better understanding of the plan and its intended effect.	The land use designations have been revised to simplify and consistent. The Plan is specific to the NSA. The DNLUP is created in accordance with the NLCA and NUPPAA. The Commission staff have reviewed Plans from around the world. As you appreciate Plans are as unique as the people's values that are intended to represent.	AANDC and other federal departments and agencies would welcome the opportunity to discuss this issue further with NPC. As the DNLUP is currently written the reader is not presented with a clear idea on what land use activities are allowed and prohibited for particular areas. There are several reasons for this confusion. For example, the use of land designations syntax is unique compared to other land use plans in Northern Canada. Therefore to understand the meaning of land designations requires additional effort and the plan as a whole is more complicated to use and less clear.	The NPC has simplified the Land Use Designations.
GOC-6	Aboriginal Affairs and Northern Development Canada (AANDC)	18/07/2013	DNLUP	1.3.4	Terminology	The term "Project" should be replaced with "Project Proposal" in order to be consistent with the Nunavut Planning and Project Assessment Act (NUPPAA), unless NPC's intention is to refer to existing projects only. What are the administrative requirements referred to in the definition of "Terms"? Since this section refers to Land Use Designations and terms being "legally binding", this needs to be clarified for the reader and the specific references in NUPPAA be incorporated.	The NUPPAA uses the Terms project and project proposal interchangeably as does the DNLUP. Both are defined in the Glossary of the Plan.		
GOC-7	Aboriginal Affairs and Northern Development Canada (AANDC)	18/07/2013	DNLUP	1.3.5	Using the Plan	Step 3: Determine if Recommendations apply to location of Project Proposal - Recommendations are not conformity requirements, they are neither legally binding nor enforceable. Furthermore, "impacts" on the values identified in the DNLUP Recommendations are assessed through the Nunavut Impact Review Board (NIRB) environmental assessment processes as well as the subsequent governmental permitting processes.	Recommendations have been removed from the plan. The current priorities and values are integrated into the regulatory process and are now managed by NIRB, NAB and other regulatory authorities. They will be both enforceable and legally binding and their implementation will be monitored annually.		
GOC-8	Aboriginal Affairs and Northern Development Canada (AANDC)	18/07/2013	DNLUP	4.2.1	Transportation	This section should include proposed transportation corridors that are part of project proposals already put forward by proponents. These include: - the proposed 350 kilometer all weather access road and port for the Iok Corridor project; - BIPAC's proposed road corridor; - the Mary River railroad, as approved in the original Mary River project certificate; - the proposed winter road for the Back River gold project; - the previous extension of the Tibbitt-Contwoyto winter road into Nunavut to Lupin and Jericho; - the road option under consideration for the Kiggivik uranium project.	The section on transportation corridors has been updated in the Plan.	Yes, AANDC is recommending these proposed transportation corridors be assigned a Land Use Designation (BHC-1 - Building Healthier Communities) similar to other proposed corridors that have been put forward by proponents.	The Land Use Designations have been simplified. The revised DNLUP addresses proposed transportation corridors.
GOC-9	Aboriginal Affairs and Northern Development Canada (AANDC)	18/07/2013	DNLUP	Schedule A	Transportation	AANDC would suggest that one way to represent the proposed transportation corridors on Schedule A would be to indicate the corridors using dashed lines. The transportation corridor under consideration from Manitoba to several of the Kivalliq communities should not appear as an existing use, as it does on Schedule A. It has not yet been submitted as a proposed project. At best, dotted lines should be used for this corridor in order to differentiate it from existing and proposed corridors that have already been introduced into the Nunavut regulatory system (i.e. proposed project description, Draft Environmental Impact Statements (DEIS) or Final Environmental Impact Statements (FEIS) submitted for conformity or screening).	NPC acknowledges this as a reasonable way to deal with proposed Transportation Corridors. NPC requests confirmation from AANDC about this approach for existing (or future existing) corridors. If the corridors identified as "proposed" in the AANDC submission were to be developed in the future, should they remain dashed in the NLUP?	AANDC agrees that when the corridor is developed that its depiction in the plan should be changed from a dashed line to a solid line.	The NPC agrees with this suggestion for future roads.
GOC-10	Aboriginal Affairs and Northern Development Canada (AANDC)	18/07/2013	DNLUP	4.4.3	Contaminated Sites	Among the acronyms listed on page 5, NCSF is defined as the National Contaminated Sites Program. It should read the Northern Contaminated Sites Program.	The acronym has been revised.		
GOC-11	Aboriginal Affairs and Northern Development Canada (AANDC)	18/07/2013	DNLUP	4.4.2	Land Remediation	Upon examination of the text in 4.4.2 and Table 1 there is the potential for misunderstanding. In the text it clearly states that AANDC and DND have shared responsibility for the clean-up of the DSW line sites. In Table 1, under the description of "permitted/prohibited uses" there is only a reference to DND having use of "operations and activities" on these sites. AANDC should have full access to these sites as well.	The NPC would appreciate a coordinated response from DND and AANDC on what types of activities should be prohibited on all Northern Contaminated Sites and who should have access/jurisdiction over each site.	The Contaminated Sites Program (CSP) is working with DND to coordinate a response regarding this issue. The proposed approach would be to create a new BHC designation. This new designation would have sites that would have Permitted/Prohibited Uses by both AANDC as well as DND. BHC-9 and BHC-10 would remain solely with DND while new BHC would have all sites that are shared between DND and AANDC. This information will be provided at a later date as both parties are still determining which sites are shared. See Annex B for information on DND sites.	The revised DNLUP addresses this issue.
GOC-12	Aboriginal Affairs and Northern Development Canada (AANDC)	18/07/2013	DNLUP	Table 1	Land Remediation	In addition, the list of sites is incomplete. The following sites are missing: CAM-F, FOXC and BAF-5 (as well as the other BAF sites however these are not under AANDC control).	The DNLUP has been revised.		
GOC-13	Aboriginal Affairs and Northern Development Canada (AANDC)	18/07/2013	DNLUP	Table 1	Land Remediation	As an additional consideration, it would be helpful to have all the sites listed in Table 1 grouped together (i.e. all FOX sites together, all CAM sites together, etc.). At the moment, they are in order of ID numbers.	The DNLUP has been revised.		

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GOC-14	Aboriginal Affairs and Northern Development Canada (AANDC)	18/07/2013	DNLUP	4.4.3	Contaminated Sites	From the point of view of the NCSF, BHC-8 and BHC-9 sites do not need to prohibit all other uses of the site. The NCSF as well as the AANDC's Nunavut Regional Office (NRO) encourages the open use of lands in Nunavut. While certain investments on site need to be protected, this does not preclude all other uses in the area. In some cases, there are no investments left on site and full access and use would be acceptable.	The NPC would like clarity on what is meant by "open use of lands in Nunavut." Does this apply to all lands in Nunavut or is it specific to NCSF sites? The NPC would request specific "cases" that would be considered appropriate for full access be identified in future submissions.	The concept of "open use of lands in Nunavut" is meant to have as few prohibited uses as possible. Once a site is remediated, it should not preclude other uses of the site however we would like to protect any investments left on site. For example, if a site has been remediated however there is a landfill remaining on site, this landfill is considered an investment by AANDC. We would not want to refuse the use of an entire area simply because there is a landfill on site. What we would request is that certain uses be prohibited on the landfill and a buffer area. For example, it would not be acceptable to build a camp on a landfill, as it would affect the integrity of the permafrost in the landfill and could cause a failure. On the other hand, if someone wanted to use the landfill as a helicopter landing pad, that would be acceptable as there would be no or very minimal impacts on the landfill. In addition, we would like to be assured that no additional contamination would be left at the site. Sites where full access should be granted are sites where the remediation has been completed and there are no remaining investments on the site. The reason CSP would like to still have the site listed is to identify that it was previously a contaminated site. An example of a site that falls within these conditions is PIN-E. This site has been remediated and should be noted as a remediated site however nothing is left at the site. AANDC can provide a list of all the sites that fall into each of the categories however it should be noted that it will need to be updated regularly with the advancement of the program.	The Land Use Designations have been simplified and will address this concern.
GOC-15	Aboriginal Affairs and Northern Development Canada (AANDC)	18/07/2013	DNLUP	4.4.3	Contaminated Sites	An investment such as a landfill (hazardous or non-hazardous waste) requires certain protection in order to maintain its structural integrity. This means that any activity that could impact a landfill should be avoided, including direct drilling, setting up a camp or creating a large landing pad. However uses such as a small helicopter landing pad or a light storage area are acceptable.	The Plan is part of an integrated regulatory system and others need to ensure the project proposal do not impact the integrity of these areas. The identification and prioritization of waste clean-up requires future consideration as part of on-going regional and sub-regional planning.		
GOC-16	Aboriginal Affairs and Northern Development Canada (AANDC)	18/07/2013	DNLUP	Schedule A	Contaminated Sites	Upon examination of the community maps in Appendix A, several sites are marked as BHC-8 (239). This designation classifies the sites as part of the Northern Contaminated Sites Program. The majority of these sites are not NCSF sites. Many of the BHC-8 (239) sites appear to be smaller waste sites that may have been identified by the public. These sites have not been confirmed by the AANDC's Contaminated Sites Program and therefore it may be erroneous to have them identified on the maps in Appendix A. In addition, leaving them on the maps will make the DNLUP outdated as the status of sites change annually. It is extremely difficult to track smaller waste sites as any person or group may clean up the site without notification to the NPC or any other authority. It is unclear why all the sites have been identified on the map. The larger contaminated sites should be identified as it could impact land use. However, the smaller waste sites will not likely affect the use of the land as they are often abandoned barrel caches. Given the amount of information on the maps, this could lead to confusion rather than clarity. Additionally, identifying all the classes of sites misrepresents the territory having it appear more contaminated than it is. AANDC suggests that all small sites be removed or the maps should clearly distinguish between AANDC sites and other sites.	It would be useful for AANDC to identify the sites it considers as "larger contaminated sites" that may be useful for inclusion in the revised DNLUP as well as list of potentially prohibited uses on or around these sites.	See Annex C - list of AANDC Contaminated Sites	
GOC-17	Aboriginal Affairs and Northern Development Canada (AANDC)	18/07/2013	DNLUP	Table 1: Land Use Designations	Contaminated Sites	Further to the points discussed above, the NCSF does see value in keeping record of identified potential contaminated sites. Furthermore, since the status of sites changes on an annual basis, having it reflected in a future approved NUP would make the plan outdated within a year of its coming into effect. A reference to the Federal Contaminated Sites Inventory ( <a href="http://www.tbs-sct.gc.ca/csi-rsf/home-accueil-eng.aspx">http://www.tbs-sct.gc.ca/csi-rsf/home-accueil-eng.aspx</a> ) within the land use plan would offer a detailed list of sites that are under federal responsibility. This inventory is updated annually and will give the current status of the site.	Please clarify if AANDC would prefer larger sites included, or no sites included.	AANDC CSP can only supply sites for which it is responsible. There are sites with other Federal custodians (Department of National Defense, Environment Canada, Royal Mounted Police, Department of Fisheries and Oceans, and Parks Canada are known custodians) as well as Government of Nunavut (GN) custodians which have sites. Here are some options for a path forward: a) For all federal contaminated sites, you can reference the Federal Contaminated Sites Inventory ( <a href="http://www.tbs-sct.gc.ca/csi-rsf/home-accueil-eng.aspx">http://www.tbs-sct.gc.ca/csi-rsf/home-accueil-eng.aspx</a> ) b. Pro: This lists ALL federal sites (small and large) and is updated by Environment Canada annually. This would also include all AANDC sites. You would not have to provide a map as the sites can easily be found on the website with their coordinates. c. Con: This only has federal sites, this would not have GN sites. You would need to consult the GN on their sites. Unfortunately this website includes all sites in the inventory, including suspected sites which have not yet been confirmed. b) CSP would recommend having a minimum standard for having a site on the map (i.e. confirmed significant contamination) to avoid having many small waste sites on the map. Having all types of sites on the map would misrepresent the state of the territory, having it appear more contaminated than it is.	
GOC-18	Aboriginal Affairs and Northern Development Canada (AANDC)	18/07/2013	DNLUP	5.1.1	Mining	Understanding the geosciences context of a deposit means knowing what lies beyond its boundaries. Very often discoveries are made beyond the boundaries of the deposit because favorable indicators were identified first (sometimes many kilometres away). The number of exploration sites that eventually become mineral deposits that could be mined is quite small. If a land use plan attempts to pre-determine where exploration or mining can take place and where not, the net effect is to discourage exploration and decrease investment. Fewer discoveries will be made as a consequence.	An area of 6% identified by AANDC as having high mineral potential is under special management and prohibits the establishment of Parks and Conservation Areas. 15% of the NSA is under a Protected Area designation. 67% is Mixed use. 80% of the NSA allows non-renewable resource development.		
GOC-19	Aboriginal Affairs and Northern Development Canada (AANDC)	18/07/2013		5.1.1 and Chapter 6	Mining	In order to indicate the level of activity the mining sector is likely to bring to the territory and for NPC to signal to industry through the land use plan what kind of potential resource economy can be developed, it should be made clear both in Section 5.1.1 and Chapter 6: Mixed Use, that all areas outside of community boundaries, parks, bird sanctuaries and critical wildlife habitat are open to exploration and potential resource development.	Is this statement generally referring to Mixed Use areas being open for exploration and potential resource development, or is it suggesting specifically that areas outside community boundaries, parks, bird sanctuaries and critical wildlife habitat should be open for development (potential resource development should not be prohibited)? Further, could AANDC please define areas that are "critical wildlife areas"?	We were of the understanding that the Mixed Use area is all of the area outside community boundaries, parks, bird sanctuaries, critical wildlife habitat, and other ecologically important areas. The question asked indicates that the Mixed Use areas will be smaller.  We strongly recommend that all areas in Nunavut, with the exception of communities, parks, protected bird sanctuaries, critical wildlife habitat, and other ecologically important areas, be open for exploration or open to some limited extent. As such, we will adjust the language in our revised text to reflect that and not make reference to Mixed use, since this is a smaller subset of the area available. See Annex A Comments on Chapter 5: Encouraging Sustainable Economic Development with Figure 1, Draft Map of Potential Areas of Exploration Leading to Mining Activity Proposed under the Land Use Classes Designated for Mining and Mineral Development.	

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GOC-20	Aboriginal Affairs and Northern Development Canada (AANDC)	18/07/2013	DNLUP	Chapter 5	Mining	<p>It is also important to understand that geoscience knowledge of the territory is far too incomplete for the mineral potential to be known and a definitive "map" to be made of the cycle of resource exploration, evaluation and exploitation.</p> <p>As a start for formulating a Land Use Designation in the DNLUP for mining, four categories are proposed under an ESED Land Use Designation: i) exploration activity; ii) past mines; iii) current operating mines; and, iv) projects in the permitting process. Currently, there is only one Land Use Designation ESED - 2 that encompasses both Existing Mines and Advanced Stages of Exploration.</p> <p>In an attempt to highlight what land area in the Territory can be considered of greatest likelihood for mineral resource exploration, evaluation and exploitation, AANDC has provided the accompanying maps (Figures 1 and 2) on the following pages. For the purpose of these illustrations, the symbols of the point data and the colors of the areas outlined and even their size are unimportant. The maps should be looked at as clusters where our existing knowledge of favorable geology and history of exploration activity is concentrated. One can immediately recognize corridors or groupings of higher 7 frequency interest.</p> <p>Combined with geophysical and geological maps, a first order set of "exploration leading to mining activity" areas could be outlined. AANDC suggests that such a selection approach, and a clearer statement about exploration in other areas, would provide more decisive input into the DNLUP.</p> <p>The level of detail presented in Figure 1 below is rough (subject to change and revision) and is only presented to illustrate the concept and rationale that AANDC is putting forward.</p>	<p>NPC greatly appreciates this information and finds it very useful, however, it is noted that it is in draft and is provided in concept only.</p> <p>NPC would greatly appreciate that future submissions contain more definitive data and potential temprohibited uses in these areas.</p>	<p>We believe that the task and decisions for creating land use classes for Nunavut is the purview of the Nunavut Planning Commission. To assist NPC, we have provided a revised version of this map. The effort to create it involved much more definitive data, however we advise NPC to consult other sources and stakeholders to add to this designated land use class. We have consulted with NRCAN and received feedback on the map. It remains as a suggested starting point for this land use class. The map (ESRI SHP file to be sent separately) provided should be considered a minimum area to consider in this class.</p> <p>In the text, we have added qualifiers which outline the types of compatible and incompatible activities that can be associated with Mineral Development and Mining Land use class.</p> <p><b>See Annex A Comments on Chapter 5: Encouraging Sustainable Economic Development with Figure 1: Draft Map of Potential Areas of Exploration Leading to Mining Activity Proposed under the Land Use Classes Designated for Mining and Mineral Development.</b></p>	
GOC-21	Aboriginal Affairs and Northern Development Canada (AANDC)	18/07/2013	DNLUP	Table 1 and Schedule A	Mining	<p>Finally, Table 1, Land Use Designations and Schedule A, appear to be missing certain ESED-1 mining and exploration sites. Please add Doris, which is an existing mine and different from Hope Bay. Sabina should also be added in ESED-1 as Advanced Stage of Exploration. Jericho and Lupin should be under an ESED designation as mines in care and maintenance.</p>	<p>The land use designations have been changed to simplify application. Existing mines are considered to conform to the land use plan in all designations.</p>		
GOC-22	Aboriginal Affairs and Northern Development Canada (AANDC)	18/07/2013		5.1.2	Oil and Gas	<p>5.1.2 Oil and Gas Exploration and Production</p> <p>Note that the Significant Discovery Licence (SDL) specifically referenced here is only one of three types of oil and gas licence. The production licence (PL) is required for a company to produce and this would generally be issued congruent with or within the boundaries of a SDL. Although there are currently no production licences in Nunavut, the text of ESED-2 should recognize that a production licence would be issued to replace a SDL, in all or in part once all necessary permitting requirements have been met.</p>	<p>The DNLUP has been revised. The land use designations have been simplify application.</p>		
GOC-23	Aboriginal Affairs and Northern Development Canada (AANDC)	18/07/2013		5.1.2	Oil and Gas	<p>Significant Discovery Licences are only issued for discoveries which have been proved by drilling a well. Exploration to locate drilling locations is much more extensive than the resulting significant discoveries and will occur either on exploration licences and/or more broadly still at a basin scale. It is this kind of exploration which has presented Nunavut with an inventory of discovered oil and gas resources, opportunity for employment and benefits in the exploration phase, has stimulated research and helped developed infrastructure. To ensure transparency, it is in our view important to be clear in the DNLUP that oil and gas development does not occur without exploration, that such exploration is necessarily extensive, involving geophysical methods and exploratory drilling, all of which are fully regulated and subject to environmental screening/assessment.</p>	<p>General comment noted.</p>		
GOC-24	Aboriginal Affairs and Northern Development Canada (AANDC)	18/07/2013		5.1.2	Oil and Gas	<p>Exploration Licences (ELs) are issued pursuant to regional calls for nominations where areas excluded from the call are clearly indicated, and a subsequent call for bids on a specific block. Although there are currently no exploration licences in Nunavut - there is a current call for nominations - the text of ESED-2 (Page 43) should recognize that an exploration licence(s) is issued to encourage exploration in parts of Nunavut with oil and gas potential. It might also be noted that a significant discovery area can increase or reduce in size with new information about the extent of a field.</p>	<p>General comment noted.</p>		
GOC-25	Aboriginal Affairs and Northern Development Canada (AANDC)	18/07/2013	DNLUP	5.1.2	Oil and Gas	<p>The SDL077 at Romulus (near Eureka) appears to have been omitted from the map.</p> <p>This area saw some drilling in the 1970s which demonstrated oil and gas resources and potential. This area is part of the Sverdrup Basin, recognized in the plan as having the potential to be one of the most lucrative economic activities in Nunavut. It is suggested that the map indicate the Romulus SDL.</p>	<p>This would be why it was dropped from earlier versions of the plan. We will note it in the Order's documents as being there, and will not change the designation.</p>		
GOC-26	Aboriginal Affairs and Northern Development Canada (AANDC)	18/07/2013	DNLUP	5.1.2	Oil and Gas	<p>AANDC is concerned with the absence of greater discussion of areas of oil and gas potential. While commercial fishing is considered as a potential economic activity, it is unclear why oil and gas is not treated in a similar manner. To improve balance across the range of potential economic activities, the discussion of areas of oil and gas potential could be framed as follows: "Project proponents should collaborate with conservation interests to ensure that optimal best practices are used to optimize economic potential and conservation interests."</p>	<p>The preferred approach for the NPC at this time is to identify areas of importance, prohibit certain activities that could detract from the qualities or importance of the area and provide a recommendation to other regulators.</p> <p>NPC would appreciate discussing uses that may be inappropriate in areas with oil and gas potential (if any) and better defining recommendations to other regulators.</p>	<p>In areas of potential importance for future economic activities such as petroleum exploration, it is recommended by AANDC that zoning which excludes exploration activities be used sparingly in the expectation that proponents can mitigate for environmental risks to the extent that is reasonably practical.</p>	<p>General comment noted.</p>
GOC-27	Aboriginal Affairs and Northern Development Canada (AANDC)	18/07/2013	DNLUP	Schedule A & B	Mapping	<p>There appears to be inconsistencies with regard to the mapping of commercial fishing areas and bird habitat areas. Note that commercial fishing areas are mapped outside the NSA and Outer Land Fast Ice Zone whereas PSE designations for bird habitat are clipped along the NSA boundary. It would be useful to see the adjoining areas of important bird habitat which lie seaward of the NSA boundary be defined as well.</p>	<p>Data will not be clipped, because there is a trans boundary obligation under NUPPAA.</p>		
GOC-28	Aboriginal Affairs and Northern Development Canada (AANDC)	18/07/2013	DNLUP	Schedule A	Lancaster Sound National Marine Conservation Area	<p>AANDC is also concerned with the designation of slivers of PSE adjoining the area of interest for the Lancaster Sound National Marine Conservation Areas (NMCA). The final boundary decision of the NMCA will take into account conservation and economic development factors. Designation of a sliver of PSE seaward of the illustrated boundary of the potential Lancaster Sound NMCA appears to ignore the process and rationale behind the past establishment. Values for conservation within the NMCA would be fully considered in this process and therefore would require a justification for protecting these adjoining areas.</p>	<p>NPC has reviewed the area based on the new Environment Canada data.</p>	<p>We would note that commercial fishing and petroleum exploration activities can coexist through cooperation and information exchange. Similarly, petroleum exploration activities are often of short duration and seasonal. To the extent that is reasonably practical they can be planned to avoid specific areas at specific times of year.</p>	
GOC-29	Aboriginal Affairs and Northern Development Canada (AANDC)	18/07/2013	DNLUP	General	Definitions	<p>Finally, it is suggested that the definitions of "Research," "Marine Communications" and "Electrical cable" be elaborated upon for greater clarity for potential project proponents. It would also be of assistance if NPC's concerns, if any, for not permitting other types of cable such as fiber optics were explained.</p>	<p>Marine communications and electrical cables meant to be read together, i.e. "communications cables" would include fibre optics cables.</p>		
GOC-30	Aboriginal Affairs and Northern Development Canada (AANDC)	18/07/2013	DNLUP	7	Implementation Strategy	<p>A Nunavut Land Use Plan needs to be a standalone document that contains the necessary information required by Inuit, government (federal and territorial), Designated Inuit Organizations (DIOs), Institutes of Public Governance (IPGs), project proponents and other stakeholders to fully understand the plan. The DNLUP is the only document subject to the approvals process under the Nunavut Land Claims Agreement (NLCA 11.5.5 through 11.5.9) and the Nunavut Planning and Project Assessment Act (NUPPAA s53 through s55). Supporting documents while part of the planning process are not part of the plan.</p>	<p>The Plan and its implementation strategy are stand alone documents and all that is required to be approved.</p>		
GOC-31	Aboriginal Affairs and Northern Development Canada (AANDC)	18/07/2013	DNLUP	7.1	Conformity	<p>The term "criteria" is misused in this section and should not be appear in a section on conformity determination. A conformity determination is based on the permitted and prohibited uses and the associated terms and conditions of a Land Use Designation.</p>	<p>The Plan is revised.</p>		
GOC-32	Aboriginal Affairs and Northern Development Canada (AANDC)	18/07/2013	DNLUP	7.1	Conformity	<p>The DNLUP should clearly confirm that Recommendations are not conformity requirements.</p>	<p>Land use designations are revised and the manner in which Recommendations has been modified along with the implementation strategy to address the concern.</p>		
GOC-33	Aboriginal Affairs and Northern Development Canada (AANDC)	18/07/2013	DNLUP	7.2	Cumulative Impacts	<p>The GC suggests that NPC work closely with NRB and NWB to develop a process for the referral of projects normally exempt from screening but where there is a concern for cumulative impacts. This framework should be made available to project proponents before they submit their project descriptions. Proponents need to understand how and why their proposed project, normally exempt from NRB screening may be impacted by NPC concerns for cumulative impacts.</p>	<p>The NRB and NWB cooperate on implementation of this opportunity. As time and resources permit more work will be undertaken. The Implementation Strategy has been revised to address areas of potential cumulative impacts concerns that have been identified during the consultations.</p>		
GOC-34	Aboriginal Affairs and Northern Development Canada (AANDC)	18/07/2013	DNLUP	7.4	Plan Amendment	<p>The Commission must consider all plan amendment requests (NLCA 11.6.2, NUPPAA s. 59 and s. 61). NPC does not have the discretionary authority to make any exceptions, even in the case of prohibited uses as suggested in this section.</p>	<p>The Implementation Strategy, Plan Amendment section has been revised</p>		
GOC-35	Aboriginal Affairs and Northern Development Canada (AANDC)	18/07/2013	DNLUP	7.5	Monitoring	<p>The Nunavut General Monitoring Plan is another multi-stakeholder forum where socioeconomic and ecosystemic information will be generated. Among other uses, this information could contribute to the monitoring of the DNLUP.</p>	<p>The Plan has been revised to identify priority research activities that will benefit the key planning issues that are being addressed in this iteration of the Plan</p>		



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GOC-48	Aboriginal Affairs and Northern Development Canada (AANDC)	18/04/2014	DNLUP	5.1.1	Mineral Exploration and Production	In order to indicate the level of economic activity the mining sector is likely to bring to the territory and for NPC to signal to industry, through the land use plan, what kind of potential resource economy can be developed, it must be explicitly stated both in Section 5.1.1 and in sections and chapters elsewhere that all areas outside of communities, parks, bird sanctuaries, critical wildlife habitat, and other designated/protected/conserved areas shall be open to mineral exploration activities. In some cases, significant exploration discoveries may lead to more resource development work or mining projects. Under circumstances where future exploration efforts occur outside of the proposed Mineral Development Leading to Mining Activity land use class, re-zoning of these significant areas to this class must be considered a priority under subsequent revisions to the land use plan. If the NLUP is seen as fixed or the revision process too complex or too lengthy, then economic activity where mineral exploration is concerned will be deemed too risky and investment in the territory will plummet. To instill confidence and certainty in the application of the NLUP, a clear commitment and a defined process to revisions and re-zoning must be articulated in the NLUP.	The Implementation Strategy sections regarding "Periodic Review and Monitoring" and "Land Use Designations and Terms" has been revised to address the concern. Where the foot print or study area of a project proposal occurs in more than one Land Use Designation it will be considered to conform as long as all aspects of the project are considered to conform with the requirements of each Designation as such plan amendments would not be required as suggested by the GOC comment.		
GOC-49	Aboriginal Affairs and Northern Development Canada (AANDC)	19/04/2014	DNLUP	5		As a start for formulating a Land Use Designation in the DNLUP for mining, two categories are proposed under an ESED Land Use Designation: (1) Mineral Development Leading to Mining Activity and (2) Areas Open to Mineral Exploration. These two categories divide the territorial land mass into two parts, as shown in Figure 1.	Land Use Designations have been clarified in the revised DNLUP.		
GOC-50	Aboriginal Affairs and Northern Development Canada (AANDC)	20/04/2014	DNLUP	5		1. Mineral Development Leading to Mining Activity This proposed land use class can be considered as having identified the most likely places where mining activity may take place in the short to medium term. It encompasses existing sub-classes that have been described in earlier communications. These are areas of (i) active and important historic exploration activity, (ii) past-producing mines, (iii) current operating mines(s), and, (iv) projects in the permitting process. Currently, there is only one Land Use Designation, ESED -1, which encompasses (ii) and (iii). Some of (iv) is included, but a significant area of interest, (i), is not represented at all.	Land Use Designations have been clarified in the revised DNLUP. 80% of the area is open to mineral development.		
GOC-51	Aboriginal Affairs and Northern Development Canada (AANDC)	21/04/2014	DNLUP	5		It is also important to understand that geosciences knowledge of the territory is far too incomplete for the mineral potential to be known or a definitive "map" as such to be made. For the first iteration of the NLUP, in consultation with Natural Resources Canada, AANDC proposes a "Mineral Development Leading to Mining Activity" land class category in an attempt to highlight what land area in the Territory can be considered of greatest likelihood for mineral resource exploration, evaluation and exploitation. AANDC provides the accompanying map as Figure 1. In this preliminary map, we have identified 28 separate areas (with about equal distribution in each of the three regions), representing about 13% of the territory. The areas are given at a low level of cartographic precision (approximately 1:2,000,000 or less) and was arrived at by using the locations of selected mineral occurrences, an examination of historical mineral tenure held in the territory, the extent of favourable geological units based on limited mapping, locations of past-producing mines (and current mine), locations of advanced exploration projects, and those projects currently in the review and permitting stages.	Land Use Designations have been clarified in the revised DNLUP. Comment addressed above.		
GOC-52	Aboriginal Affairs and Northern Development Canada (AANDC)	22/04/2014	DNLUP	5		To reiterate, we currently believe it is within these areas where the highest probability exists for potential mines to be operating or where advanced exploration may continue over the next 5-10 years. It is naive to believe that accurate forecasting as presented in this land use class is possible. Thus AANDC advises caution to NPC in using this information as a tool to guide or restrict mineral exploration and mining development to only these areas. The level of detail presented in Figure 1 is approximate (subject to change and revision) and is presented to illustrate the concept and rationale that AANDC is putting forward.	Land Use Designations have been clarified in the revised DNLUP. The area of high mineral potential is part of area that is exclusive to mining.		
GOC-53	Aboriginal Affairs and Northern Development Canada (AANDC)	23/04/2014	DNLUP	5		For these reasons, a second land use class is required and we propose "Areas Open to Mineral Exploration", discussed under 2. below. Whereas other activities such as tourism and recreation may be possible in areas away from mines, but within the same land class, the uncertainty associated with speculative behaviour and challenges to mineral development projects under NLUP clauses dictate that these and all other activities incompatible with mineral development should be prohibited. Types of activities permitted could include exploration, research, roads, railroads, utilities and corridors, infrastructure, and remediation and reclamation.	Land Use Designations have been clarified in the revised DNLUP.		
GOC-54	Aboriginal Affairs and Northern Development Canada (AANDC)	24/04/2014	DNLUP	5		2. Areas Open to Mineral Exploration New and significant investment is likely to occur within considerably larger areas of the territory, beyond the existing exploration districts outlined in Figure 1, as the Mineral Development Leading to Mining Activity land use class. What is thus required is a second land use class as "Areas Open to Mineral Exploration", which is illustrated in Figure 1. We recognize that this area represents the remainder of the territory and over laps with obvious restricted areas, such as (a) Territorial and National Parks, (b) communities and (c) wildlife sanctuaries, (d) reserves, and (e) other areas identified as ecologically important. The withdrawal of these areas from this land class is expected; however the remainder of the territorial land mass should permit mineral exploration activity and remain open to the possibility of future mineral development leading to mining. This proposed land use class may represent all of the Mixed Use land class, but it also includes other land use classes such as PSE-2.	This comment has been addressed above.		
GOC-55	Aboriginal Affairs and Northern Development Canada (AANDC)	25/04/2014	DNLUP	5		Allowance for transit corridors: Implications for other land use classes in the DNLUP. Whereas many prospective mineral exploration districts are isolated from communities and logistical staging points, most land use classes in the NLUP use must allow for overland and marine transportation. The known and proposed terrestrial transportation and supply corridors to support exploration and mineral development activity are noted in Figure 1. AANDC proposes that explicit allowance for this type of activity be included in the land use classes that these corridors cross. The transit corridors illustrated are of two types: i) engineered, year-round roads and ii) seasonal right-of-way for temporary use as winter routes. The seasonal corridors can be (but need not be) defined as a separate land class, but should be recognized within the land classes they cross as being part of that land class description as a permitted activity. The constructed roads with year-round use are transportation corridors that should be identified on the NLUP map as a distinct land use class.	Land Use Designations have been clarified in the revised DNLUP. The DNLUP identifies transportation corridors that are for public use and are intended to be long term as opposed to be for temporary private use. The section on transportation has been updated.		
GOC-56	Environment Canada	18/07/2013	DNLUP	General	Land Use Designations	Clarity in visual representation of zoning is critical that the visual representation of the DNLUP accommodate the cultural prominence of 'oral and visual' means for processing information by the majority of Nunavummiut. If information critical to understanding the practical application of the Land Use Designations can only be gained by closely reading map legends, or by a careful read of the corresponding text in a series of accompanying documents, there is a risk a high proportion of the general population will make incorrect assumptions about how areas of interest to them are designated (i.e. it is possible people will assume that all areas in what are 'green' zones in the current draft plan, will receive similar treatment, not realizing that there is a significant difference in the level of restriction associated with a PSE-1 versus a PSE-8). Confusion regarding application of the Land Use Designations could be minimized by 'colour-coding' zones based on the restrictions associated with them (e.g. PSE-1 and ECP-1 have similar restrictions and should be colour coded similarly, etc.).	The Plan is a tool to manage resources as part of an integrated regulatory system. The land use designations have been simplified. The implementation of the Plan will be automated prior to its approval allowing interested persons to rely on the on-line automated system to make them aware of the requirements of the Plan.		
GOC-57	Environment Canada	18/07/2013	DNLUP	Definitions	Definitions	Definitions of tourism; recreation; research In June 2010 EC presented NPC with a list of migratory bird key habitat sites that should be considered for restricted access or special management zoning through the land use plan (letter attached). It seems that most of EC's proposed 'restricted access' sites are addressed in the migratory birds PSE and ECP zones in the draft plan. EC suggests that the land use plan must be clear that prohibitions and authorizations associated with the zones do not apply to activities for which Inuit Beneficiaries do not require any form of lease, permit, or other authorization pursuant to the NLCA (and it would be helpful to the reader to list them). In order to achieve the intent of these zones, EC has concern that the terms 'tourism', 'recreation', and 'research' have not been defined.	The Plan only applies to Project Proposals which are defined. General statements are made throughout the plan to limit confusion. Term tourism is defined. The land use designations have been simplified. The use of recreation is removed from the old designation. When the term Research is used in the Plan it is defined.		

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GOC-58	Environment Canada	18/07/2013	DNLUP	Definitions	Definitions	In all Migratory Birds PSE and ECP zones, "Research" that would be consistent with EC's intent for those areas would be research that it contributes to wildlife and/or habitat conservation OR is neutral with respect to conservation and does not cause long-term or repeated disturbance or significant alteration of wildlife habitat.	The Land Use Designations have been revised. When specific use of the term research requires definition it is addressed.			
GOC-59	Environment Canada	18/07/2013	DNLUP	Definitions	Definitions	In all Migratory Birds PSE and ECP zones, "Tourism" that would be consistent with EC's intent for those areas would be tourism that does not cause long-term or repeated disturbance of wildlife or significant alteration of wildlife habitat.	The Land Use Designations have been revised to exclude specific uses deemed to be incompatible with the values.			
GOC-60	Environment Canada	18/07/2013	DNLUP	Definitions	Definitions	In all Migratory Birds PSE and ECP zones, "Recreation" that would be consistent with EC's intent for those areas would be recreation that does not cause long-term or repeated disturbance of wildlife or significant alteration of wildlife habitat.	The Land Use Designations have been revised to exclude specific uses deemed to be incompatible with the values.			
GOC-61	Environment Canada	18/07/2013	DNLUP	3	Migratory Bird Sanctuaries	In Migratory Bird Sanctuaries and National Wildlife Areas, activities must not be inconsistent with the purpose of the protected area and must be consistent with its most recent management plan, where a management plan exists.	The Land Use Designations have been revised to exclude specific uses deemed to be incompatible with the values.			
GOC-62	Environment Canada	18/07/2013	DNLUP	3	Migratory Bird Sanctuaries	In Migratory Bird Sanctuaries and National Wildlife Areas, conformity requirements must be consistent with the terms of the Inuit Impact and Benefits Agreement for Migratory Bird Sanctuaries and National Wildlife Areas in the Nunavut Settlement Area.	It is an objective under Goal 1 of the Commission's broad planning policies, objectives and goals that processes not be duplicated as such a site specific management plan should be compatible with the Land Use Plan. Typically management plans would be as restrictive or more restrictive than the Plan.			
GOC-63	Environment Canada	18/07/2013	Options and Recommendations	2	Migratory Bird Habitats	1. Special management terms and conditions for certain key migratory bird habitat sites EC notes that provision has not been made for special management of certain key migratory bird key habitat sites, as advised in its June 2010 letter to NPC, instead these sites are represented in areas where only recommendations apply. EC advises that these sites would be better managed for migratory birds if the current 'recommended' zoning were changed to a 'special management' designation that had mandatory conformity requirements. In June 2013, EC provided a detailed explanation to NPC of the process it followed to collect and analyze the data used to develop detailed technical advice for key migratory bird habitat sites. EC will summarize this site-specific advice in a map book of sites. The map book will be delivered to NPC in the fall of 2014.	The Plan has been revised to address the concerns whenever possible. Special Management Areas and Protected Areas are now used to manage project proposals in areas that are highly and moderately intolerant to human disturbance.			
GOC-64	Environment Canada	18/07/2013	DNLUP	General	Land Use Plan	2. Subject areas addressed by first generation plan A first generation plan zoning scheme must address these resources: -Migratory birds -Terrestrial species of economic and cultural importance -Marine mammals -Key areas of biodiversity -Key community areas of importance -Key areas of known economic potential -Transportation corridors	The Commission's broad planning policies, objectives and goals outline the parameters requirements of the plan content. All of the matters identified are included within the NLCA 11.41(a) requirement. The content of the Plan is further defined by feedback from residents and validity of data sources if any that could support a land use planning decision. The themes identified are addressed accordingly under the 5 broad goals.			
GOC-65	Environment Canada	18/07/2013	DNLUP	2.4	Climate Change	A first generation land use plan must acknowledge the reality of climate change and use zoning to identify areas where climate change-specific risks may manifest, and where mitigation measures for certain activities are recommended. It is predicted that some areas of Nunavut will be susceptible to significant biophysical and geophysical change related to climate warming. Other areas will be more resilient and will undergo relatively little change. It is prudent to account for degree of susceptibility to climate-induced change in the land use planning process. Planning for future change should include discouraging development in areas where climate change effects (e.g. coastal erosion, permafrost loss/dumping, drying of ponds, lakes, and wetlands, etc.) is most likely to have significant negative effects on infrastructure. This determination should be made in the context of community planning (where to extend community residential areas) as well as for industrial developments (e.g. mining waste management practices that depend on intact or consistent permafrost would be discouraged in areas likely to experience permafrost loss). Future planning should also support conservation of biological "resilience" in Arctic ecosystems -by safeguarding areas that are least likely to experience significant ecosystem change (indicators of change could include species composition, moisture regimes, etc.) due to climate warming. These resilient areas will, in time, take on a relatively higher level of importance to conservation of Arctic species, as baseline ecosystem conditions change.	The NPC request that EC provide the location of the areas discussed in a future submission on the Plan or as a future plan amendment. The NPC would require GIS shapefiles to support the accurate identification of these areas. An analysis of the landscape change predicted will support the development of criteria to manage impacts on these areas. Also not at present the Commission's objective on climate change is specific and is addressed through a Term that provides direction to Regulatory Agencies.	From the context of community planning, Climate Change Adaptation Plans (Government of Nunavut) may be useful sources of information concerning impacts of climate change for the NLUP.  For further detailed information from NRCAN and for links to relevant research and mapping that has been conducted, please refer to Annex D "Sources of Information Relevant to Development of Nunavut Land Use Plan".  As we become aware of further information sources on this topic we will endeavor to make these known the NPC.  The Arctic Council, through its Arctic Climate Adaptations project (AACAC), is doing a pilot project in the Barfren Bay-Davis Strait region. That exercise might prove informative for the land use plan. The contact person is Russ Shearer, AAANDC (Russell.Shearer@aanac.gc.ca)	General information noted. Future planning will continue to consider climate change.	
GOC-66	Environment Canada	18/07/2013	Working Together	4	Cumulative Impacts	The only LUP in the north to date that has tried to use thresholds is the North Yukon LUP. It has worked so far, though much of the planning area is withdrawn from development and there have been no large scale proposals in the remainder. EC feels that the approach NPC is proposing a reasonable starting point with respect to an approach for flagging cumulative impact concerns (i.e. a checklist of questions for staff for run through when reviewing project descriptions that have been submitted to the NPC for conformity determination). The NPC's role is not to determine cumulative impacts; it is to flag projects where NPC has concern for cumulative impact issues for projects not subject to NIRB screening. Some of the guiding questions that are in the implementation guidance document (Appendix 2 of "Working Together to Implement the Nunavut Land Use Plan") are applicable; some need to be better thought through and reworded. Recognizing that the issue of identifying and responding to cumulative impact concerns is one that requires collaboration between NPC and other relevant Institutes of Public Government (e.g. NIRB, NWIB, and NWB), EC suggests that it would be useful to have a more complete set of guiding questions articulated in the implementation guidance document. EC suggests, for example, that the implementation chapter of the DNLUP should contain a clear description of the purpose of the cumulative impacts assessment (as per our second paragraph, above); a clear description of factors to be considered in determining the potential for cumulative impacts; and the questions NPC intends to consider in its review.	The Commission's broad planning policies, objectives and goals require the NPC to implement thresholds and indicators developed by government and other PIG. The Plan has been revised to identify in which specific situations the NPC may refer a project for cumulative impact concerns. The Plan also identifies the need for government experts to develop and seek stakeholder on appropriate thresholds and indicators. Once this is achieved the NPC would be able to consider a plan amendment to implement the findings.			
GOC-67	Fisheries and Oceans Canada	18/07/2013	DNLUP		Cod Lakes	Section 3: Fisheries and Oceans Canada A. Exploratory/ Commercial Fisheries and Subsistence Fisheries Exploratory/ Commercial Fisheries Need for Additional Details on Permitted Activities While recognizing the need for flexibility in permitted and prohibited uses and that the listed uses are not exhaustive, Fisheries and Oceans (DFO) is concerned that greater clarity is needed in some circumstances. DFO notes that on page 38 of the DNLUP, Table 1, under the Protecting and Sustaining the Environment (PSE) land use designations, the PSE-2, ID 73, Cod Lakes, that there is currently an exploratory fishery for Arctic Char on Qasigalminio Lake, with the Paingnirtung Hunting and Trappers Organization (HTO) as the license holder. The PSE-2 designation states that permitted uses are "Tourism, Recreation, and Research" and lists no prohibited uses. DFO assumes that the DNLUP allows for the continuation of this exploratory fishery, as well as the possible future commercial fishery for Arctic Char that might follow the exploratory fishery. The above comments may also apply to page 38 of the DNLUP in Table 1, PSE-2, ID 74, Cod Lakes - Tarijanuq Lake. This site may also be an exploratory fishery for Arctic Char, with Paingnirtung HTO as the license holder. The uncertainty may be due to some confusion about the name of the lake, as this name has also been used to refer to a lake near Kimimut, which also reportedly has cod. If this refers to the lake near Paingnirtung, there is also an exploratory fishery for Arctic Char and a possible future commercial fishery DFO therefore strongly suggests that the Land Use Designation include exploratory and commercial fisheries as permitted uses for the two Cod Lakes.	The DNLUP does not identify commercial fisheries to be a permitted use in the identified Cod Lakes. However, if there is an existing exploratory licence, the use would likely be a legal non-conforming use discussed in Section 7.9 on the DNLUP. Can DFO explain why commercial fisheries are an appropriate use in these small lakes if the Atlantic Cod in them are being considered for listing under the Species at Risk Act? Yes, Tarijanuq Lake is near Paingnirtung.	For further, detailed information from NRCAN and for links to relevant research and mapping that has been conducted, please refer to Annex D "Sources of Information Relevant to Development of Nunavut Land Use Plan".		

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GOC-68	Fisheries and Oceans Canada	18/07/2013	DNLUP	2.1.3	Atlantic Cod Lakes	The PSE-2 designation for the Cod Lakes lists permitted uses as "Tourism, Recreation, and Research". The draft NLUP defines "Tourism" as meaning "all land uses related to tourism, such as tourism facilities or outfitting". DFO is concerned about the breadth of the definition for "Tourism". With respect to "tourism" and "recreation" permitted uses, as both could include sports fishing, it is important that additional angling pressure not comprise the cod, which may become listed under the Species at Risk Act. DFO is also concerned with respect to the parameters of the permitted use of "research", which is not defined in the DNLUP, and as to whether research might extend to exploratory industrial activity.	The SARA designation was not advanced to justify managing Cod Lakes. Atlantic Cod lakes have been removed from the DNLUP as there is no longer justification to provide special Terms to manage the species.		
GOC-69	Fisheries and Oceans Canada	18/07/2013	DNLUP	Table 1	National Parks Awaiting Full Establishment	At page 39 of the DNLUP, Table 1: ECP-1, ID 76, National Parks Awaiting Full Establishment - Ukkuksalkik, listed permitted uses include "Tourism, Recreation, and Research" and prohibited uses are "All other uses". Please note that Waigeo Bay is a Schedule V water body identified in the NWT Fishery Regulations that might have commercial fishing, and there may be others. DFO recommends that "existing commercial fisheries" be added to the listed permitted uses until such time as Ukkuksalkik National Park, already an operating park, is formally legislated under the Canada National Parks Act. Afterward, commercial fishing will be guided by the NLCA which limits commercial fishing opportunities to beneficiaries of the agreement, by any applicable legislation and regulations and by the IIBA for Ukkuksalkik National Park.	The land use designations have been simplified to provide clarity. The Plan only identifies prohibited uses.	As we become aware of further information sources on this topic we will endeavor to make these known the NPC.	General comment noted.
GOC-70	Fisheries and Oceans Canada	18/07/2013	DNLUP	5.1.3	Commercial Fisheries	Include "Shrimp" in Referenced Commercial Fisheries DFO suggests modifying the sentence on page 31, s.5.1.3 of the DNLUP, which presently states "Commercial fisheries are an emerging sector in Nunavut's economy, with turbot and char currently being harvested" to refer instead to "turbot, char and shrimp" (add "shrimp", which is currently being harvested).	Shrimp have been included to the text of the Plan		
GOC-71	Fisheries and Oceans Canada	18/07/2013	DNLUP	5.1.3	Commercial Fisheries	Consider Protecting Commercial Fishing Areas by Land Use Designation. The DNLUP plan identifies most important char and Greenland halibut (turbot) commercial fishing areas, but they are only assigned a recommendation and not a Land Use Designation. Since recommendations are not conformity requirements and therefore are neither legally binding nor enforceable, DFO strongly suggests protecting the following commercial fishing areas through a Land Use Designation: In The Cumberland Sound Turbot Management Area Inshore Areas DFO notes that there has been a lot of interest, and some exploratory fisheries, in the inshore areas around Qikiqtarjuaq and Clyde River for Greenland Halibut (turbot), and a lot of recent interest in doing an exploratory fishery for Greenland Halibut (turbot) in Jones Sound near Grise Fiord. There has also been both past and recent interest in exploratory Greenland Halibut (turbot) fisheries from the community of Pond Inlet in NAFO Divisions OA and OB. DFO notes that Nunavut has substantial Greenland Halibut (turbot) allocations in these areas, encompassing both the offshore in Davis Strait and Baffin Bay (identified as Zone 1 in Article 15 of the Nunavut Land Claims Agreement) and the inshore inside the Nunavut Settlement Area Boundary. Please see Figure 3 for a map showing NAFO Divisions OA and OB.	Can DFO provide advice on how a Land Use Designation could protect commercial/exploratory/subsistence fishing areas? Are there particular uses that should be prohibited? It should also be noted that commercial fisheries would be a permitted use in all Mixed Use areas of the DNLUP.	DFO is concerned about the uncertainty that would remain if the DNLUP does not identify commercial fisheries to be a permitted use in the identified Atlantic Cod Lakes. The indication that NPC "would likely" consider existing exploratory licensed fisheries to be legal non-conforming uses under Section 7.9 of the draft NLUP leaves uncertainty and the categorization of those exploratory licensed fisheries as "legal non-conforming uses" does not reflect that they are initiatives by local communities. As well, if the science is available to make this management decision, exploratory fishing will lead to commercial opportunities. Both Qasigalimniq and Tasiarjuaq Lakes (located adjacent to Cumberland Sound) have active exploratory fisheries for Arctic Char. (Oak Lake is located in the southern portion of Frobisher Bay, and does not have an exploratory fishery.) Inuit organizations have sought to create economic opportunities to support communities through the development of fisheries. In order for a fishery to show commercial viability, sustained effort over a 5 year period is required through the exploratory licence phase to allow for proper assessment towards a commercial fishery status/ operation. It is important to enable economic opportunities on these lakes as science and traditional knowledge information becomes available. Given the current draft NLUP designation of "PSE", and considering that legal rights of a non-conforming use terminate when that use ceases, relying on a "non-conforming use" does not provide an indication to DFO or to the licence holders (such as Pangnirtung Hunting and Trappers Organization for Qasigalimniq Lake exploratory fishery) that the NPC would allow the "non-conforming use" to change from an exploratory fishery to a commercial fishery. On NPC's question as to why commercial fisheries are an appropriate use in these small lakes if the Atlantic Cod in them are being considered for listing under the Species at Risk Act, we advise as follows. On June 11, 2012, the Nunavut Wildlife Management board (NWMB) declined to approve the proposed listing of Atlantic Cod (Arctic Lakes' population) under SARA. On November 30, 2012, the Minister of Environment also cooperated with the DFO Minister to accept the NWMB position and	SARA designation has not gone forward Atlantic Cod lakes have been removed from the DNLUP.
GOC-72	Fisheries and Oceans Canada	18/07/2013	DNLUP	5.1.3	Commercial Fisheries	Consider Protecting Commercial Fishing Areas by Land Use Designation. The Schedule V of the Northwest Territories Fishery Regulations list of water bodies that can be fished for commercial purposes in Nunavut Schedule V of the Northwest Territories Fishery Regulations <a href="http://laws101.justice.gc.ca/en/regulations/C.R.C.,c.947/page-13.html#h-14">http://laws101.justice.gc.ca/en/regulations/C.R.C.,c.947/page-13.html#h-14</a> includes a list of water bodies that can be fished for commercial purposes in Nunavut. Specifically, for Nunavut refer to the water bodies and their details that are listed for Regions IV, V, and VI.	There are several hundred water bodies identified in the regulations. Shapefiles identifying these water bodies would be required. Goal 1 of the broad planning policies objectives and goals require that the Plan recognize jurisdictional responsibilities and not duplicate other regulatory processes.		
GOC-73	Fisheries and Oceans Canada	18/07/2013	DNLUP	5.1.3	Commercial Fisheries	Consider Protecting Commercial Fishing Areas by Land Use Designation. Shrimp Fishing Areas (SFAs) DFO notes that Nunavut has allocations in the SFAs (see Figure 4 and 5). There have been changes to boundaries of Shrimp Fishing Areas, which are being implemented for 2013. The attached slide shows SFAs Davis Strait, Nunavut and Nunavik (former SFAs 2 and 3). (Although this slide is entitled "Proposed SFAs", these new SFAs have now been approved)	Consideration has been given on how to mitigate impacts on commercial fisheries and the plan updated accordingly.		
GOC-74	Fisheries and Oceans Canada	18/07/2013	DNLUP	2	Fisheries	Consider Protecting Exploratory Fisheries by Land Use Designation DFO strongly suggests protecting the following exploratory fishing areas through Land Use Designation: Exploratory Arctic Char Fisheries [specific sites near Pangnirtung, Coral Harbour, Qikiqtarjuaq, Baqhurst Inlet]	Can DFO provide advice on how a Land Use Designation could protect commercial/exploratory/subsistence fishing areas? Are there particular uses that should be prohibited?	It is important to ensure that Subsistence, Exploratory, Commercial and Not yet developed Emerging Fisheries (or fishing opportunities) be afford Land Use Designations and/or specified as permitted uses. Inuit representatives have underlined the reliance of beneficiaries under the Nunavut Land Claims Agreement on natural resources to maintain and enhance community development, including reliance on current Commercial Greenland Halibut and Shrimp fisheries.	Consideration has been given on how to mitigate impacts on commercial fisheries.
GOC-75	Fisheries and Oceans Canada	18/07/2013	DNLUP	4.1.2	Fisheries	Expand Statement on Subsistence Harvesting. Ensure "Cultural Value" is understood to include the Harvesting of Fish and Marine Mammals. Chapter 4.1.2, Community Land Use, states: "Nunavummiut rely on migrating species for subsistence, and as a result, have a long established history of land use across much of the NSA. The Commission has been working to map this history, within living memory. Areas of importance to communities have been identified based on patterns of community land use. To manage impacts on areas of traditional land use, they are only assigned a Recommendation (BHC-R2). "Migrating species" are not defined in the DNLUP, and may be understood to include fish and marine mammals. DFO suggests that the statement be amended to read "...Nunavummiut rely on migrating species, including fish and marine mammals for subsistence".	Plan has been revised. General comment noted.		
GOC-76	Fisheries and Oceans Canada	18/07/2013	DNLUP	4.1.2	Fisheries	DFO also strongly suggests that, after consultation with communities, consideration be given to protecting important subsistence fisheries through a Land Use Designation, rather than by a recommendation, which is neither legally binding nor enforceable. Another example, the BHC-R2 Recommendation given to areas of traditional land use is "Project Proposals located in areas of traditional land use should take into account impacts on the cultural value of the area." "Cultural value" is not defined and may not be understood by all to include subsistence harvesting. DFO suggests that consideration be given to defining "cultural value" and indicating that subsistence harvesting of fish and marine mammals is included as part of "cultural value".	It should also be noted that commercial fisheries would be a permitted use in all Mixed Use areas of the DNLUP. The land use designations have been revised to include priorities and values that address cultural values.		
GOC-77	Fisheries and Oceans Canada	18/07/2013	DNLUP	4.1.2/5.1.3	Fisheries	Commercial/Exploratory and Subsistence Fisheries Should Be Given Land Use Designations DFO strongly suggests that commercial/exploratory and important subsistence fisheries are given Land Use Designations. While the designations of commercial and subsistence fishing areas may overlap, it is recommended that important subsistence char fishing areas be explicitly protected.	It should also be noted that commercial fisheries would be a permitted use in all Mixed Use areas of the DNLUP. Consideration has been given to how to mitigate impacts on commercial fisheries and subsistence fisheries. At present the land use plan prohibits activities.		
GOC-78	Fisheries and Oceans Canada	18/07/2013	DNLUP, Working Together	7	Implementation	Clarify Implementation Process and Include Information about "Regulatory Authorities" in Implementation At page 35 of the DNLUP, under "Implementation Strategy", "Conformity Determination" states that: "A Conformity Determination is a review of a Project Proposal to determine if it complies with the criteria of the Plan." It goes on to state that NPC shall receive and consider all Project Proposals, determine if they conform to the Plan, forward proposals with determinations and any recommendations to "the appropriate federal and territorial agencies" and for project proposals that are not exempt from screening by NIRB, forward same to the NIRB with determinations/ recommendations for the NIRB to screen.	The Implementation Strategy has been updated to closely reflect NUPPAA.		

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GOC-79	Fisheries and Oceans Canada	18/07/2013	DNLUP	2.2	Cumulative Impacts	A project under DFO's Strategic Program for Ecosystem-Based Research and Advice (SPERA) will produce a heat map of cumulative shipping impacts on walrus in the Fove Basin/ Hudson Strait complex. Jason Hamilton is the principal investigator of this project. (DFO will provide this map to the NPC when completed, as an example of a tool that can be used to assess cumulative impacts)	General comment noted. The information can be introduced at the public hearing on the Plan or through future plan amendment.		
GOC-80	Fisheries and Oceans Canada	18/07/2013	DNLUP	3.1.1.3	Application of plan	Application of Plan to National Marine Conservation Areas (NMCAs) DFO suggests that the wording of passages that discuss the application of the draft N.L.U.P. to NMCAs be modified to provide greater consistency and address the following concern. The draft states at page 14, 1.3.4, "Application of the Plan": "The Plan does not apply within established National Parks, National Marine Conservation Areas...". At page 2, 3.1.1.3, "National Marine Conservation Areas" the draft Plan again indicates that "land use plans developed by the Commission do not apply within established NMCAs". Page 16, 2.1 sets out that the Commission's Objectives include to "manage land use in and around areas of biological importance, Conservation Areas," and to "address the requirements for conservation, management and protection of aquatic resources, their habitats and ecosystems." DFO suggests that the objectives statement make it clear that the objective is not to manage land in Conservation Areas (as currently stated), so that the objectives are consistent with the stated application of the Plan.	To clarify, the plan will apply to "Conservation Areas" as defined under Article 9 of the N.L.C.A. (this list does not include NMCAs). NUPPAA clarifies that the plan will not apply to established NMCAs. The objectives were developed under 11.4.1(a) and cannot be modified at this point. General comment noted and when the 11.4.1(a) document is revisited the point of clarity can be addressed.	With respect to NPC's clarification that the plan will apply to Conservation Areas as defined under article 9 of the N.L.C.A., and will not apply to established NMCAs, DFO notes that Marine Protected Areas can be established under the Oceans Act. While national parks and NMCAs are specifically exempt from the draft N.L.U.P., an Oceans Act Marine Protected Area (MPA) created in the Nunavut Settlement Area is not specifically exempt from the draft N.L.U.P.	NPC agrees with this response. Should an MPA be proposed the Land Use Plan can support its establishment and management.
GOC-81	Fisheries and Oceans Canada	18/07/2013	DNLUP	2	PSE	Page 16 lists areas and issues that have been identified to support the goal of protecting and sustaining the environment. DFO suggests that "key fish and/or marine mammal habitat areas" be added to the bulleted list. DFO suggests clarification to make it clear that the Protecting and Sustaining the Environment designation persists in a scenario where, for example, an interest - a marine mammal or fish - may no longer exist/be present in an area, but is a Species at Risk and the area is part of a recovery plan for that species.	General comment noted.		
GOC-82	Fisheries and Oceans Canada	18/07/2013	DNLUP	4.2		Page 25, 4.2, DFO suggests that the Commission's policy to "identify methods to manage ship traffic, ship to shore activities and routes in marine areas of Nunavut" state that the Commission will achieve this objective in consultation with the Government of Nunavut and relevant GC departments.	Policies are from 11.4.1(a) and have been removed from the DNLUP as they are specific to the operations of the NPC and not appropriate in the Plan.		
GOC-83	Fisheries and Oceans Canada	18/07/2013	DNLUP	Table 1	PSE-3 Permitted and Prohibited Uses	Marine Infrastructure At page 38, Land Use Designation PSE-3 lists permitted uses as "Tourism, Recreation, Research, Marine Infrastructure, Marine Communications and Electrical Cables". This designation encompasses the Belcher Island Polynyas, the North Water Polynya and several Marine Conservation Areas (MCAs). Marine Infrastructure is defined as meaning "ports or other infrastructure needed to support the coming and going of marine vessels to land and communities". As polynyas, MCAs and Marine Protected Areas (MPA) are all highly sensitive areas, DFO strongly suggests that the impact of human activities on these environments be as minimal as possible. DFO strongly suggests that marine shipping activities and infrastructure in these polynyas not be a permitted use and that a PSE-2 designation should be considered for any area containing a Polynya, MPA or MCA.	The NPC has revised the plan to include these important marine habitats.		
GOC-84	Fisheries and Oceans Canada	18/07/2013	DNLUP	Table 1	ECP -1 Permitted and Prohibited Uses	Research Page 39, ECP-1 Designation lists permitted uses as: "Tourism, Recreation, and Research". DFO has the same concerns with the scope of these permitted uses with respect to the proposed Lancaster Sound National Marine Conservation Area as stated in the preceding paragraph regarding the PSE 2 and 3 designations and the meaning of these terms.	The Land Use Designations have been simplified in the revised DNLUP. Research when managed is specifically defined.		
GOC-85	Fisheries and Oceans Canada	18/07/2013	DNLUP	Table 1	ESED -1 Corridors	Page 43, ESED-1 Designation lists the permitted uses as: "Mining, Remediation and Reclamation Activities, Roads, Railways, Utilities and Corridors". "Utility Corridor" is defined in the DNLUP to mean "an area that is intended to be used for electrical, utility or communications infrastructure." DFO is concerned that shipping intensity and periodicity by way of a corridor not be a permitted ESED-1 use, and suggests that this designation be clarified with respect to what type of "Corridors" is permitted.	The Land Use Designations have been simplified in the revised DNLUP. The intent of land use designations that support the ESED Goal of the plan is intended to promote economic development. Economic Development requires infrastructure to transport materials to global markets. The Plan explains the limitations to establishing transportation corridors at this time.		
GOC-86	Fisheries and Oceans Canada	18/07/2013	DNLUP	Appendix A	Community Maps	DFO suggests that the Community Maps appended to the draft N.L.U.P. be revised to more clearly illustrate the Land Use Designations and to make the maps easier to utilize and avoid the need for the user to repeatedly refer back and forth between the maps and the Land Use Designation Tables. For example, the map on page 46 of the draft N.L.U.P. contains several overlapping Land Use Designations, including Building Healthy Communities, Protecting and Sustaining the Environment, Encouraging Conservation Planning and Encouraging Sustainable Economic Development. DFO also suggests modifications to ensure that no designated area is hidden beneath another and that measures such as putting the Land Use Designations on each page for ease of reference be considered. To improve the flow of the draft Plan and the Options and Recommendations document, DFO also recommends creating a better link between the maps and the Land Use Designations.	Community Maps have been removed from the DNLUP. It is ok if Land use designations overlap. The implementation of the Plan will be automated once NUPPAA is enacted. The NPC is the authority on advising regulatory authorities and proponents on the requirements of the land use plan. This is achieved through the issuance of conformity determinations. If clarity is required the NPC would encourage you to contact our office directly.		
GOC-87	Fisheries and Oceans Canada	18/07/2013	DNLUP	Schedule A	Lancaster Sound National Marine Conservation Area	The ECP-1 Proposed Lancaster Sound Conservation Area under a large opaque polygon (shapefile) does not demonstrate to the reader that this is a marine habitat and it is overlain by the ESED designation which, as it will allow for marine shipping, gives conflicting information.	The Land Use Designations have been simplified in the revised DNLUP. The map has been revised to more clearly reflect the requirements of the various land use designations and terms applicable within the proposed Lancaster Sound Marine Conservation Area.		
GOC-88	Fisheries and Oceans Canada	18/07/2013	DNLUP	Appendix A	Permitted and Prohibited Uses	DFO also suggests revisions to the map on Page 68: the Sanikiluaq Community Map, PSE-3 (36) Belcher Island Polynya. PSE-3 (36) is referenced as Key Bird Habitat (P.38 Table 1), which is somewhat consistent with the information reported in the DFO document "Conversations with Nunavut Communities on Areas of Ecological Importance" (at p. 131), however this DFO document also elaborates with much greater detail on important habitat of several other species and notes an additional Polynya (at page 30). PSE-3 Land Use Designation lists permitted uses as "Tourism, Recreation, Research, Marine Infrastructure, Marine Communications and Electrical Cables". "Marine infrastructure" is defined as "ports or other infrastructure needed to support the coming and going of marine vessels to land and communities". DFO suggests that permitting the "marine infrastructure" be reconsidered, as it does not promote the intent of the PSE designation.	The NPC has revised the plan to include these important marine habitats.		
GOC-89	Fisheries and Oceans Canada	18/07/2013	DNLUP	General	Information and Map Scale	DFO suggests that NPC use the information relied on to create the maps in "Conversations with Nunavut Communities on Areas of Ecological Importance: Fisheries and Oceans 2011" (see Appendix), as these maps clearly identify communities, and reference polynyas, fish, wildlife and marine mammal habitat at map scale which better conveys information such as how shipping activity might be referenced to a particular land location. DFO also suggests consideration of including additional detail in the Tables to document fish and fish habitat (including marine mammals) as well as birds and caribou, available in the information in the 2011 DFO document "Conversations with Nunavut Communities on Areas of Ecological Importance".	General comment noted.		
GOC-90	Fisheries and Oceans Canada	18/07/2013	DNLUP	General	Data Layers and Shape Files	DFO suggests including the following DFO data layers into the draft N.L.U.P.: • Land locked Cod Lakes; • Arctic Ecologically and Biologically Significant Areas (EBSAs); • Arctic Marine Workshop, Areas of High Biological Importance (HBI); • Traditional Knowledge; and • Fove Basin Area of Interest Please see the Annex at the end of this chapter for information as to how to access the data layers and shapefiles	It would be beneficial if DFO could advise the Commission on how these areas may need to be managed.	DFO is reviewing EBSAs in the Nunavut Settlement Area with a view to possibly identifying areas of heightened ecological importance. Further information on the EBSAs may be submitted to NPC for its consideration under the "Protecting and Sustaining the Environment" designation. Information that will inform how these areas may need to be managed may also follow.	

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GOC-91	Fisheries and Oceans Canada	18/07/2013	DNLUP		Ecologically and Biologically Significant Areas (EBSAs)	Arctic Ecologically and Biologically Significant Areas (EBSAs) DFO strongly suggests that the draft NLUP reference all of the EBSAs identified in the recent Canadian Science Advisory Secretariat (CSAS) process. (Please refer to <a href="http://www.dfo-mpcg.ca/csas-scsc/Publications/SBAS/2011/2011_CSAS_eng.pdf">http://www.dfo-mpcg.ca/csas-scsc/Publications/SBAS/2011/2011_CSAS_eng.pdf</a> ) The EBSAs are identified through a scientific and technical process, combining the best available scientific and traditional knowledge. They are evaluated against a specific set of criteria, including: uniqueness; aggregation; fitness consequence; resilience and naturalities. The EBSA maps show policy makers and managers which criteria were met to make the area an EBSA. Policy guidance on management of EBSAs is limited to "areas where a higher degree of risk aversion is needed". Most of the important marine mammal areas would be noted if the plan identified EBSAs. In the future, as available science and traditional knowledge about these areas expands, DFO may be able to provide additional information to NPC to assist with consideration of these areas.	NPC has taken this information into account and EBSA are incorporated into the Plan.		
GOC-92	Fisheries and Oceans Canada	18/07/2013	DNLUP		Ecologically and Biologically Significant Areas (EBSAs)	Arctic Marine Workshop - Areas of High Biological Importance (HBI) These Areas of HBI are referenced in the options and recommendations section where they overlap with key bird habitat sites. If the above EBSA data is included, please remove the references to the Areas of HBI because they overlap.	The HBI information has been replaced by EBSA data.		
GOC-93	Fisheries and Oceans Canada	18/07/2013	DNLUP		Traditional Knowledge	Traditional Knowledge layers in the DFO shapefiles (see Annex) were collected by the DFO Oceans Program in 2011. The layers include valuable ecological and biological information and were collected for marine planning purposes (under the MPA Network Initiative). These layers were included in the development of the EBSAs.	General comment noted.		
GOC-94	Fisheries and Oceans Canada	18/07/2013	DNLUP		Foxe Basin Area of Interest (AOI)	DFO recommends that NPC use the information in the shapefile with respect to the Foxe Basin AOI as it sees fit. An AIG for a Marine Protected Area (MPA) was identified in the Foxe Basin marine area. Nunavut agencies and communities, government departments and other stakeholders were consulted and expressed interest in establishing a MPA in the Foxe Basin marine area. The Foxe Basin marine area is a major entrance/exit migratory route for bowhead whales and narwhal through Fury and Hecla Strait. It is also a central aggregation area for walrus. A small Polynya provides highly productive habitat for a wide variety of marine life. The boundary of the AOI was identified through community consultations and science meetings. The MPA process was postponed.	This information has been used in the revised DNLUP to manage project proposals within the Foxe Basin Marine Area of importance.		
GOC-95	Fisheries and Oceans Canada	18/07/2013	DNLUP		Shapefiles	The above comments for the draft Nunavut Land Use Plan include recommendations to include/consider three additional shapefiles. Please see the Annex for directions to these shapefiles.	General comment noted.		
GOC-96	Department of National Defence and Canadian Armed Forces	18/07/2013	DNLUP	Acronyms	CFS	The word Services is incorrect. DND does not have CF Services and this term could be misleading for the general public. DND/CAF has only one station in the North which is CFS Alert. <b>Recommend:</b> Recommend to replace the word Services with Station.	The DNLUP has been revised.		
GOC-97	Department of National Defence and Canadian Armed Forces	18/07/2013	DNLUP	Acronyms	DND	The acronym listed only says DND although both Department of National Defence and Canadian Armed Forces are listed. <b>Recommend:</b> To change to DND/CAF to reflect both Department of National Defence and Canadian Armed Forces	The DNLUP has been revised.		
GOC-98	Department of National Defence and Canadian Armed Forces	18/07/2013	DNLUP	Definitions	Definition of Land	The definition could be more inclusive by using the NUPPAA definition. <b>Recommend:</b> Using/referring to the definition from NUPPAA: "Land" includes land covered by water, whether in onshore or offshore waters and resources, including wildlife"	The NPC has revised the definition to ensure consistency with the NUPPAA definition.		
GOC-99	Department of National Defence and Canadian Armed Forces	18/07/2013	DNLUP	Definitions	Definition of Land Use Designation	Land Use Designation This definition could be expanded to explain the purpose of Land Use Designations and its role. Land Use Designations are geographic-specific categories with associated sets of land use and management policies associated to them. <b>Recommend:</b> Suggest that the definition of Land Use Designation should include the purpose and role of Land Use Designations.	The revised DNLUP includes this information.		
GOC-100	Department of National Defence and Canadian Armed Forces	18/07/2013	DNLUP	Definitions	New Definition - Permitted Uses	<b>Permitted Use:</b> The definition of Prohibited uses is defined but not Permitted uses. <b>Recommend:</b> Adding the definition of permitted uses. NUPPAA under 4B(2) provides: "a land use plan may contain descriptions of permitted, subject to any terms and conditions that the plan sets out, and prohibited uses of land."	The NPC has revised the definition to ensure consistency with the NUPPAA definition.		
GOC-101	Department of National Defence and Canadian Armed Forces	18/07/2013	DNLUP	Definitions	Definition - Transportation Corridor	Clarification question: The word "intended" within the definition implies that the term transportation corridor only refers to new or proposed routes not those that already exist. This is not clear. If it is referring to all transportation corridors, existing and future then the definition should reflect this. <b>Recommend:</b> To clarify the meaning of the definition to existing or new or both.	The NPC has taken this into consideration.		
GOC-102	Department of National Defence and Canadian Armed Forces	18/07/2013	DNLUP	1.3.4	Terminology	Last paragraph - Final sentence and throughout the document Term Project and Project Proposal "...as they relate to the management and regulation of project proposals." Project proposals and projects seem to be interchangeable within the Plan which creates a lot of confusion. In this case it seems as though the sentence is referring to projects not project proposals. The Plan either needs to distinguish between the two and ensure they are used in the correct context throughout or only use one of the terms. <b>Recommend:</b> To clarify the use of project and project proposal in the Plan.	The NPC has taken this into consideration. Note: NUPPAA uses either Term .		
GOC-103	Department of National Defence and Canadian Armed Forces	18/07/2013	DNLUP	2.1		First bullet The sentence contains two different tenses and should be reworded. Suggest deleting the "s" on provides <b>Recommend:</b> Deleting the "s" on provides.	Revised.		
GOC-104	Department of National Defence and Canadian Armed Forces	18/07/2013	DNLUP	2.1	Definitions	Second bullet Areas of Significance to Inuit This term is mentioned within bullet two, is this the same as areas of interest as defined within the definitions section, or does this have a different meaning? If it is different this meaning should be provided in the definitions section. <b>Recommend:</b> Defining in glossary section, areas of significance to Inuit and Areas of Interest need found in para. 2.1, second bullet to help the reader understand the difference between both terms.	The definitions have the same meaning. The Areas of Significance to Inuit are the Areas of Interest that were identified by Inuit.		
GOC-105	Department of National Defence and Canadian Armed Forces	18/07/2013	DNLUP	4.4.2	Land Remediation	"The Former Distant Early Warning (DEW) was" ... add "a" after was. Also - the areas should be replaced by the sites. <b>Recommend:</b> 1st sentence in para 4.4.2: Add "a" between the word was and system. "The Former Distant Early Warning (DEW) was a system of radar stations built in 1954 across the Arctic: as the primary line of air defense warning for the North American Continent." 2nd sentence in para 4.4.2: <b>Recommend</b> replacing the word areas with the word 'sites' has it is the correct term to refer to the NWS Establishments. The areas are either administered by the Aboriginal Affairs and Northern Development Canada...	The DNLUP has been revised.		
GOC-106	Department of National Defence and Canadian Armed Forces	18/07/2013	DNLUP	4.4.2	Land Remediation - Editorial	Last Paragraph Sentence should be reworded so that it does not indicate DND directly requested the 300m setback. <b>Recommend:</b> "A 300m setback will be applied to areas under the administrative control of the Department of National Defence."	Can DND clarify which sentence needs rewording?	See Annex B.	Annex B does not address that setback issue and is not addressed in the revised DNLUP.
GOC-107	Department of National Defence and Canadian Armed Forces	18/07/2013	DNLUP	4.5.1	Department of National Defence Sites - Editorial	Please change the title of this section from Canadian Forces Stations to Department of National Defence Establishments DND/CF only owns one Canadian Forces Stations in Nunavut (CFS Alert) and the information could be misleading to the general public. <b>Recommend:</b> Change the title by removing the word "Stations" and replacing it with "Establishments" as per the definition in the National Defence Act (NDA) "Defence Establishments".	The NPC has revised the title.		

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GOC-108	Department of National Defence and Canadian Armed Forces	18/07/2013	DNLUP	4.5.1.1	Canadian Forces Stations - Editorial	<b>Recommend:</b> Replace the word airport with the term 'aerodrome'. There are no airport facilities in Eureka and the information could be misleading to the general public. Replace the current wording with the following paragraph: Eureka is a site shared by multiple Federal Departments such as Environmental Canada, Natural Resources Canada and Department of National Defence. The aerodrome is administered by Environment Canada, Fort Eureka (accommodation building located beside the aerodrome) is maintained by DND, a number of other buildings are located on the site and maintained by Environmental Canada such as the weather station.	The NPC has revised the wording in the paragraph as well as the title of airport to aerodrome.		
GOC-109	Department of National Defence and Canadian Armed Forces	18/07/2013	DNLUP	4.5.1.1	Canadian Forces Stations - Editorial	Canadian Forces Stations 2nd paragraph <b>Recommend:</b> Rewriting and shortening the 3rd para in section 4.5.1.1 as follows: "Nanisivik is the future site of the deep-water naval facility and helipad located on Baffin Island, 40 km from the community of Arctic Bay in Nunavut. Once complete, the naval facility will support the Royal Canadian Navy and other Government of Canada operations."	The NPC has revised the 3rd paragraph to match that recommended by DND.		
GOC-110	Department of National Defence and Canadian Armed Forces	18/07/2013	DNLUP	7.1.0	Land Use Designations, Terms and Recommendations - Editorial	7.1.0 Land Use Designations, Terms and Recommendations Recommendation: Removing "the Commission believes that..."	The DNLUP has been revised.		
GOC-111	Department of National Defence and Canadian Armed Forces	18/07/2013	DNLUP	Table 1	Editorial	Table 1 BNC-9 CFS Eureka to be replaced by DND Establishments Recommendation: Amending to: DND Establishment instead of CFS Eureka	The DNLUP has been revised.		
GOC-112	Department of National Defence and Canadian Armed Forces	18/07/2013	DNLUP	Table 3.3	Editorial	Table 3.3 Remove "CFS" Eureka and insert Fort Eureka (DND Accommodation building) Recommendation: In Table 1, page 41, item 203 should read "Eureka" and not "Canadian Forces Station Eureka" as this site does not belong to DND. We only own a few structures on the site.	The DNLUP has been revised.		
GOC-113	Department of National Defence and Canadian Armed Forces	18/07/2013	DNLUP	Table 3.3	Editorial	Table 3.3 Remove "CFS" in front of Nanisivik and replace by Nanisivik Naval Facility Recommendation: In Table 1, page 41, item 204 should read "Nanisivik Naval Facility" and not "Canadian Forces Station Nanisivik."	The DNLUP has been revised.		
GOC-114	Department of National Defence and Canadian Armed Forces	18/07/2013	DNLUP	Ref A	The whole document	References to CF (Canadian Forces) must now be changed to CAF (Canadian Armed Forces).	The DNLUP has been revised.		
GOC-115	Department of National Defence and Canadian Armed Forces	18/07/2013	DNLUP	Definitions	DND Establishment	DND Establishments, DND/CAF would like to insert the following definition in your Definition Section of the DNLUP: <b>Definition:</b> DND Establishments: as an installation together with its personnel and major equipment, organized as an operating entity. DND/CAF supports the implementation of the GC's Northern Strategy. The GC has given CAF three roles: o Defending Canada o Defending North America o Contributing to International Peace and Security In the Arctic, CAF must have the capacity to exercise control over and defend Canada's sovereignty. As activities and development on land and waters increases in Northern regions, the military will play a vital role in demonstrating a visible Canadian presence and helping other government agencies to respond to any threats which may arise. Specifically CAF will maintain the capacity to: - Provide surveillance of Canadian territory and air and maritime approaches; - Maintain search and rescue response capabilities that are able to reach those in distress anywhere in Canada on a 24/7 basis; - Assist civil authorities in responding to a wide range of threats from natural disasters to terrorist attacks. In support of our role and mandate, we believe that DND Establishments and sites should be included in another Land Use Designation and not in the Building Healthier Communities. After reviewing the NPC Broad Planning Policies, Objectives and Goals (1) we suggest that DND/CAF would be best located within the first Goal 1: Strengthening Partnership and Institutions. This Land Use Designation would be a new one added to the Draft Plan.  (1) Source: Nunavut Planning Commission Broad Planning Policies, Objectives and Goals, 10 November 2007, Cambridge Bay, NU. According to the Commission's Objective is to: o promotes an integrated approach that acknowledges the roles and supports the continued implementation of cooperative management processes of all departments and agencies with responsibility for air quality, land, water and resource management, as well as traditional land uses. It avoids duplication and maximizes available resources. This Land Use Designation would better represent DND/CAF role in the North.	The DNLUP has been revised to include this definition.		
GOC-116	Department of National Defence and Canadian Armed Forces	18/07/2013	DNLUP	4.5	Sovereignty	DND/CAF supports the implementation of the GC's Northern Strategy. The GC has given CAF three roles: o Defending Canada o Defending North America o Contributing to International Peace and Security In the Arctic, CAF must have the capacity to exercise control over and defend Canada's sovereignty. As activities and development on land and waters increases in Northern regions, the military will play a vital role in demonstrating a visible Canadian presence and helping other government agencies to respond to any threats which may arise. Specifically CAF will maintain the capacity to: - Provide surveillance of Canadian territory and air and maritime approaches; - Maintain search and rescue response capabilities that are able to reach those in distress anywhere in Canada on a 24/7 basis; - Assist civil authorities in responding to a wide range of threats from natural disasters to terrorist attacks. In support of our role and mandate, we believe that DND Establishments and sites should be included in another Land Use Designation and not in the Building Healthier Communities. After reviewing the NPC Broad Planning Policies, Objectives and Goals (1) we suggest that DND/CAF would be best located within the first Goal 1: Strengthening Partnership and Institutions. This Land Use Designation would be a new one added to the Draft Plan.  (1) Source: Nunavut Planning Commission Broad Planning Policies, Objectives and Goals, 10 November 2007, Cambridge Bay, NU. According to the Commission's Objective is to: o promotes an integrated approach that acknowledges the roles and supports the continued implementation of cooperative management processes of all departments and agencies with responsibility for air quality, land, water and resource management, as well as traditional land uses. It avoids duplication and maximizes available resources. This Land Use Designation would better represent DND/CAF role in the North.	The broad planning policies, objectives and goals of the NPC set out five broad areas and issues. To maintain consistency with the original DNLUP the chapters have not been changed however, the Land Use Designations within these chapter headings have been revised. DND Establishments have been designated as Special Management Areas (SMA).		
GOC-117	Department of National Defence and Canadian Armed Forces	18/07/2013	DNLUP	Ref B		Ref statement: AANDC should have full access to Northern Contaminated Sites. DND/CAF agrees that AANDC should have access to Northern Contaminated Sites which they are responsible for under the MOU between both departments (DND/AANDC), dated 1984.  As the 6 sites listed below are co-located with active North Warning System sites, we recommend that the permitted access be restricted to the DEW line remediation areas and not to the North Warning System site and installations.  Recommend the following wording for the following 6 sites:  - BAF- 5 Resolution Island - CAM-B Hart Island - CAM-D Simpson Lake - FOX-A Bray Island - FOX-B Nadludjuk Lake - FOX-1 Rowley Island  - Permitted Uses: Remediation and Reclamation Activities, DND Operations and Activities, AANDC Remediation Activities	The Plan has been revised to allow Federal Government operations. We believe the GC can manage /appropriate activities at these sites in accordance with jurisdictional interests.	PCA recommends that the NLUUP does not prohibit the establishment of NPs or NM/CAs or the designation of NRS anywhere in the NSA subject to meeting all relevant requirements set out in the Nunavut Land Claims Agreement and the Nunavut Planning and Project Assessment Act and respecting relevant Government of Canada policies. The comment that the NLUUP should "not prevent advancing new Park or Conservation Area proposals within the Nunavut Settlement Area and Outer Land Fast Ice Zone, nor amendments to the boundaries..." was provided as a joint comment from EC, PCA and DFO on September 16, 2010. The comment was reiterated in 2013 because it is unclear how it is being addressed in the draft NLUUP. The definition of "Conservation Area" is that found in the NLCA and NUPPPA.	NPC is aware of the concern and has taken it into consideration in the revised DNLUP.

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GOC-118	Department of National Defence and Canadian Armed Forces	18/07/2013	DNLUP	Ref A	BHC-9 Designation	<p>The following sites listed are Distant Early Warning System sites.</p> <p>We suggest adding the site names as well as code name for ease of reference especially with the residents and communities of the NSA.</p> <p>Recommend removing the existing list and replacing with the following list:</p> <ul style="list-style-type: none"> <li>- PIN-2 Cape Young</li> <li>- PIN-3 Lady Franklin Point</li> <li>- PIN-4 Byron Bay</li> <li>- CAM-M Cambridge Bay</li> <li>- CAM-1 Jenny Lind Island</li> <li>- CAM-2 Gladman Point</li> <li>- CAM-3 Shepherd Bay</li> <li>- CAM-4 Pelly Bay</li> <li>- CAM-5 Mackar Inlet</li> <li>- FOX-M Hall Beach</li> <li>- FOX-1 Rowley Island</li> <li>- FOX-2 Longstaff Bluff</li> <li>- FOX-3 Dewar Lakes</li> <li>- FOX-4 Cape Hooper</li> <li>- FOX-5 Broughton Island</li> <li>- DYE-M Cape Dyer</li> </ul> <p>The wording for permitted and prohibited uses should remain as listed in the document:</p> <p><del>Permitted uses: Domestication and Discontinuation Activities, DND Operations and Activities</del></p>	The Plan is updated.		
GOC-119	Department of National Defence and Canadian Armed Forces	18/07/2013	DNLUP	Ref A	BHC-10 Designation	<p>The following sites listed in this section are active North Warning System sites which are part of the North American Air Defence Modernization Project. We suggest adding the site names as well as code name for ease of reference especially with the residents and communities of the NSA. Recommend removing the existing list and replacing with the following list:</p> <ul style="list-style-type: none"> <li>Zone 1 - Inuvik</li> <li>PIN-1BG Croker River</li> <li>Zone 2 - Cambridge Bay</li> <li>PIN-2A Harding River</li> <li>PIN-3 Lady Franklin Point</li> <li>PIN-DA Edinburgh Island</li> <li>PIN-EB Cape Peel West</li> <li>CAM-M Cambridge Bay</li> <li>CAM-A3A Sturt Point North</li> <li>CAM-1A Jenny Lind Island</li> <li>CAM-B Hat Island *</li> <li>CAM-2 Gladman Point</li> <li>CAM-CB Goa Haven</li> <li>CAM-3 Shepherd Bay</li> <li>CAM-D Simpson Lake *</li> <li>Zone 3 - Hall Beach</li> <li>CAM-4 Pelly Bay</li> <li>CAM-5A Cape McLoughlin</li> <li>CAM-FA Lalior River</li> </ul>	The DNLUP has been revised to contain the list provided.	The comment that the NLUJ should "not prevent advancing new Park or Conservation Area proposals within the Nunavut Settlement Area and Outer Land Fast Ice Zone, nor amendments to the boundaries..." was provided as a joint comment from EC, PCA and DFO on September 16, 2010. The comment was reiterated in 2013 because it is unclear how it is being addressed in the draft NLUJ. The definition of "Conservation Area" is that found in the NLCA and NUPPAA.	
GOC-120	Department of National Defence and Canadian Armed Forces	18/07/2013	DNLUP	Ref A - new	DND Establishment	<p>Gascoyne Inlet located on Devon Island.</p> <p>DND/CAF site which should be included in the NLUJ.</p> <p>A ArcGIS Shapefile of the site has been provided to your GIS Staff. This site is used for Science and Research personnel at DND. The camp includes accommodation facilities, storage buildings and airstrip. This site is also used for several exercises by the Canadian Rangers and for sovereignty operations.</p> <p>Recommend the following wording:</p> <ul style="list-style-type: none"> <li>- Permitted uses: DND Operations and Activities</li> <li>- Prohibited uses: All other uses</li> </ul>	The DNLUP has been revised to include this site.		
GOC-121	Department of National Defence and Canadian Armed Forces	18/07/2013	DNLUP	Ref A - new		<p>High Arctic Data Communications Systems (HADCS) sites.</p> <p>DND/CAF sites which should be included in the NLUJ. The High Arctic Data Communication System is a chain of six microwave repeaters sites link used for communication purposes.</p> <p>ArcGIS Shapefiles of each site have been provided to your GIS Staff.</p> <ul style="list-style-type: none"> <li>Hurricane Microwave System - GRANT</li> <li>Hurricane Microwave System - VICTOR</li> <li>Hurricane Microwave System - WISKEY</li> <li>Hurricane Microwave System - YANKEE</li> <li>Hurricane Microwave System - IDA</li> <li>Hurricane Microwave System - BLACK TOP RIDGE</li> </ul> <p>Recommend the following wording:</p> <ul style="list-style-type: none"> <li>- Permitted uses: DND Operations and Activities</li> <li>- Prohibited uses: All other uses</li> </ul>	The DNLUP has been revised to include these sites.	<p>Comments were provided by PCA to NPC on that issue in 2010 and these comments are still valid: • June 15, 2010 email from Maryse Mahy to Jonathan Savoy and Adrian Boyd:</p> <p>"Please also note that, further to our discussion of informal notification zones around national historic sites, the proposed 25km notification zone may change for some sites as a result of future NHS-IIBA negotiations on these national historic sites." • June 8, 2010 email from Maryse Mahy to Jonathan Savoy and Adrian Boyd:</p> <p>"NPC proposal: As suggested in your February 23, 2010 email, an "informal notification zone" can also be used for National Historic Sites, similar to the proposal for National Parks. We propose the notification area be 25 km. Notification can be given for all projects, or for a list of activities chosen by Parks Canada. Please let me know Parks Canada's preference for the size of the notification area and the type of activities to be referred. Note that this is not an official zone that will be included on the Plan, but an informal administrative tool used by the NPC to inform Parks Canada of activities near National Historic Sites."</p> <p>PCA Comment: Thank you. The proposed notification approach (25 Km notification zone) seems to address our concerns. At this point, we would appreciate being notified of any project that NPC assesses for conformity, whether or not it is sent to NISB for review, because we are currently unsure of the scope of NPC's conformity assessments. We also would like to know if it will be possible to adjust this later (possibly by identifying types of projects about which we would like to be notified) if we realize that being notified of any project assessed by NPC for conformity is unnecessary." Please also note that, further to our discussion of informal notification zones around national historic sites, the proposed 25km notification zone may change for some sites as a result of future NHS-IIBA negotiations on these national historic sites."</p>	It is NPC's intention to have a mechanism to provide notifications through an online tool.
GOC-122	Parks Canada	18/07/2013	DNLUP	3.1	Editorial	<p>Legal Compliance</p> <p>GOC Expectation: The planning process and resulting DNLUP shall be compliant with the NLCA and NUPPAA. • Section 3.1 of the 2011/2012 DNLUP refers to existing parks as well as future parks and should clearly indicate under a sub-heading that the NLUJ does not apply to or within Auyutituaq, Qutliritspaq, and Similk national parks of Canada (section 8.2.9 of the NLCA) nor within new national parks (for example, Ukusisalik, Qausuittuq/Bathurst Island) once established (section 8.2.10 of the NLCA) under the Canada National Parks Act.</p>	Revised.		
GOC-123	Parks Canada	18/07/2013	DNLUP	3.1.1.3	Editorial	<p>It should also be clearly stated that the NLUJ will not apply to or within any NMCA once established (section 8.2.10 of the NLCA) or to National Historic Sites when administered by Parks Canada (section 9.3.5) although no National Historic Sites are administered by Parks Canada at the time of development of this DNLUP.</p>	Wording in sections 3.1.1.3 and 3.1.2.4 address this comment.	June 15, 2010 email from Maryse Mahy to Jonathan Savoy and Adrian Boyd.	

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GOC-124	Parks Canada	18/07/2013	DNLUP	3.1.1.2		<p>Policy Consistency</p> <p>GoC Expectation: the DNLUP must be consistent with federal department and agency mandates, authorities, commitments and policies, including international conventions and agreements.</p> <ul style="list-style-type: none"> <li>The area east of the proposed Qausuittuq NP boundary (currently covered by a land withdrawal) should be protected from development as decided by the Senior MERA Committee in 2002 (moratorium on mineral exploration and development until the Peary caribou recover and/or their fate is otherwise determined.)</li> </ul>	The Plan has been revised to address this concern regarding the protection of Peary Caribou.	Please see DFO's suggestion that EBSAs be identified. Information on this topic can be found via the Canadian Science Advisory Secretariat (CSAS) process. (Please refer to <a href="http://www.dfo-mpo.gc.ca/csas-sccs/Publications/SAR-AS/2011/2011_055-eng.pdf">http://www.dfo-mpo.gc.ca/csas-sccs/Publications/SAR-AS/2011/2011_055-eng.pdf</a> )	EBSAs have been included in the revised DNLUP.
GOC-125	Parks Canada	18/07/2013	DNLUP	3	Permitted and Prohibited Uses	The NLP should not prevent advancing new Park or Conservation Area proposals within the Nunavut Settlement Area and Outer Land Fast Ice Zone, nor amendments to the boundaries of the currently proposed protected areas that are indicated in the land use plan, subject to meeting all relevant requirements set out in the Nunavut Land Claims Agreement and the Nunavut Planning and Project Assessment Act and respecting relevant Government of Canada policies. (Comment made in GoC comments from September 2010)	In response to other planning partner feedback approximately 6% of the NSA prohibits the establishment of new parks and conservation areas because it has been identified as having high mineral potential by AANDC. National Historic Parks administered by PCA are considered to be conforming in any land use designation including the area exclusive to mineral exploration.		
GOC-126	Parks Canada	18/07/2013	DNLUP	3.1.1.3	National Marine Conservation Areas	The NLP should not prevent other planning processes including those for federal/ territorial marine and terrestrial protected area networks, integrated management and establishing marine environmental quality standards. (Comment made in GoC comments from September 2010). Parks and Conservation Areas (as defined in the NLCA, i.e., including national parks, national marine conservation areas and national historic sites) will be established in the future in areas of Nunavut that had not yet been precisely identified when this DNLUP was being developed. In particular, the GoC has committed in its National Marine Conservation Areas System Plan to establish national marine conservation areas in all marine regions that are partly or entirely within the Nunavut Settlement Area. In addition to the Lancaster Sound region, areas of interest have been identified in all remaining marine regions within the NSA (Arctic Basin, Arctic Archipelago, Queen Maud Gulf, Baffin Island Shelf, Fove Basin, Hudson Bay, James Bay and Hudson Strait). Preferred NMCA candidates have been confirmed in two of these marine regions (Hudson Bay and James Bay). Information on these future national marine conservation area proposals may only become available after the approval of a first generation NLP. (Comment made in GoC comments from September 2010) The GoC has also made commitments to establish national parks in natural regions within the Nunavut Settlement Areas that are not yet represented. National historic sites can be found in almost any setting, from urban or industrial locales to wilderness environments. It is imperative that the land use plan recognizes the need for flexibility in incorporating National Historic Sites (NHS) in all zones and allowing for the preservation of their heritage value. Most national historic sites are relatively small in size, often commemorating a single structure, however, some sites, such as the Fall Caribou Crossing, may consist of large tracts of land.	NPC is aware of the concern and has taken it into consideration in the revised DNLUP. Less than 6% of the Territorial restricts the establishment of Parks and Conservation Areas. This special management of the NSA applies to the areas AANDC identified as potentially having high mineral potential. The Plan allows for National Historic Parks administered by parks Canada to be established in any land use designation.		
GOC-127	Parks Canada	18/07/2013	DNLUP		Permitted and Prohibited Uses	<p>Clarity and Conformity Determinations</p> <p>GoC Expectations:</p> <ul style="list-style-type: none"> <li>The DNLUP must be clear and understandable to all users.</li> <li>Conformity determinations are expected to be based on objective and clear conformity requirements.</li> <li>As indicated in comments provided by PCA in the past along with other GoC comments, for proposed national parks that have a land withdrawal in place the Territorial Lands Act requirements should be respected in the definition of permitted/prohibited uses in the NLP, i.e., the affected land requires special management consistent with the prevention of new third party interests in these lands, the affected land cannot be disposed by lease or license of occupation; these areas also require special management to ensure that the cultural and ecological integrity and heritage values of future park resources are preserved.</li> </ul>	General comment noted.		
GOC-128	Parks Canada	18/07/2013	DNLUP	3.1.1.3	Permitted and Prohibited Uses	As indicated in comments provided by the GoC, before the NLP should recognize/support interim protection of the area within the proposed Lancaster Sound NMCA boundary through a conformity requirement prohibiting the exploration for or development of petroleum resources within Canada's proposed NMCA boundary. Note that the proposed ECP-1 designation for the proposed NMCA would not be consistent with the Canada National Marine Conservation Areas Act, which allows marine navigation and fishing to continue within the conditions set out in a NMCA management plan and zoning. Therefore, ECP-1 as presently proposed is not an appropriate designation for Lancaster Sound within the DNLUP. The only outright prohibitions in NMCAs under the Act are mineral and petroleum exploration and development, and ocean dumping; the extent and nature of other uses will be set out in the Lancaster Sound NMCA zoning and management plan. ECP-2 as presently defined would appear to be a better designation.	The Plan has been revised reflect the feedback received		
GOC-129	Parks Canada	18/07/2013			Notification	PCA has in the past discussed the idea with NPC of a "notification zone" around existing national parks, national marine conservation areas and national historic sites to inform PCA of proposed projects outside of these Parks and Conservation Areas that could affect them. It is not clear currently how this concept is being integrated in the DNLUP.	The NPC is developing an automated system to implement the land use plan. Interested parties will be able to sign up to be notified when project proposals are received.		
GOC-130	Parks Canada	18/07/2013	DNLUP	3.1	Existing and Proposed Parks and Conservation Areas	<ul style="list-style-type: none"> <li>The DNLUPs have not clearly addressed the following interests to date: <ul style="list-style-type: none"> <li>The NLP should not prevent advancing new Park or Conservation Area (As defined in the NLCA, i.e., including national parks, national marine conservation areas and national historic sites) proposals within the Nunavut Settlement Area and Outer Land Fast Ice Zone, nor amendments to the boundaries of the currently proposed protected areas that are indicated in the land use plan, subject to meeting all relevant requirements set out in the NLCA and NUPPAA and to respecting relevant GoC policies. (Comment made in GoC comments from September 2010)</li> <li>The NLP should not prevent other planning processes including federal/ territorial marine and terrestrial protected area networks, integrated management and establishing marine environmental quality standards.</li> <li>National historic sites can be found in almost any setting, from urban or industrial locales to wilderness environments. It is imperative that the land use plan recognizes the need for flexibility in incorporating NHS in all zones and allowing for the preservation of their heritage value. Most national historic sites are relatively small in size, often commemorating a single structure, however, some sites, such as the Fall Caribou Crossing, may consist of large tracts of land.</li> <li>Clarity on how these interests will be met in the NLP is important.</li> </ul> </li> </ul>	The revised DNLUP has addressed these concerns.		
GOC-131	Parks Canada	Huikitak River	DNLUP	3.1.1.2	Parks	<p>Updates on status of park establishment</p> <ul style="list-style-type: none"> <li>The national park proposed on Bathurst Island is now referred to as the proposed Qausuittuq National Park.</li> <li>Updated shapefile for boundaries of Ukkuksalik NP: It will include the Inuit Owned Lands now known as RE-32 once the exchange process is fully completed. An Order in Council (PC2012-0786) was made in June 2012 to authorize the exchange; the last step with the Land Titles Office is waiting to be completed. (<a href="http://www.pco-bcp.gc.ca/oc-cdc.asp?lang=eng&amp;Page=secretariats&amp;txOCID=2012-0786&amp;txFromDate=&amp;txToDate=&amp;txPrecis=&amp;txDepartment=&amp;txAct=&amp;txChapterNo=&amp;txChapterYear=&amp;txBillNo=&amp;docComingIntoForce=&amp;DoSearch=&amp;Search=&amp;ZF=List&amp;view=attach=26211&amp;binDisplayFig=1">http://www.pco-bcp.gc.ca/oc-cdc.asp?lang=eng&amp;Page=secretariats&amp;txOCID=2012-0786&amp;txFromDate=&amp;txToDate=&amp;txPrecis=&amp;txDepartment=&amp;txAct=&amp;txChapterNo=&amp;txChapterYear=&amp;txBillNo=&amp;docComingIntoForce=&amp;DoSearch=&amp;Search=&amp;ZF=List&amp;view=attach=26211&amp;binDisplayFig=1</a>). The shapefile will be provided to NPC shortly.</li> </ul>	NPC has revised the DNLUP to reflect the new name and shapefile.		
GOC-132	Parks Canada	18/07/2013	DNLUP	2	Polynyas	The DNLUP does not identify polynyas either generally (except in the second bullet under "to achieve these Objectives..." on page 16, or by reference to particular ones requiring protection under the PSE designation (aside for the North Water Polynya and Belcher Island Polynya, proposed as key bird areas with PSE-3 zoning). This is in strong contrast to categories such as "key bird habitat sites" and "caribou habitat" that are afforded that recognition. Similarly, no reference is made to key marine mammal habitats akin to that made for key bird habitats. Several such areas are well known, such as Kokotoo Bay, Cunningham Inlet and Crowell Bay to name but three, although the last of these does have a PSE-3 designation that appears to be related to the bay being a key bird habitat. PCA suggests that NPC takes this information into consideration when making further land use decisions.	The Plan has been revised to include polynyas.		

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GOC-133	Parks Canada	11/04/2014	DNLUP	3.1.1.3	Lancaster Sound National Marine Conservation Area	Update on Lancaster Sound NMCA Feasibility Study Parks Canada, the Government of Nunavut and the Qikiqtani Inuit Association participated in 2 consultations sessions (summer 2012 and fall 2013) with 5 communities (Pond Inlet, Grise Fiord, Arctic Bay, Resolute, Clyde River) to inform them of the Lancaster Sound NMCA feasibility study project, present study results and consult them on a proposed boundary. The recommended boundaries will be presented in a feasibility report that will be prepared by the PCA-GN-QIA Lancaster Sound NMCA Steering Committee. Any modifications on proposed boundaries will be provided to the NPC as soon as possible.	General comment noted.		
GOC-134	NRCAN	25/04/2014	DNLUP	General		Annex D - Sources of Information Relevant to Development of Nunavut Land Use Plan (Information on discouraging development in areas that are likely to experience permafrost loss)	General comments noted.		
GOC-135		25/04/2014	DNLUP	General	Contaminated Sites	Annex C - List of Contaminated Sites (recommended Land Use Designation recommendations)	The DNLUP has been revised to incorporate this information.		

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BIMC-1	Baffinland	14-Feb-14	DNLUP	Definitions	Shipping	Marine shipping is an essential component of the development of the Mary River Project. While the definition of "transportation corridor" includes marine shipping routes, it is not currently clear how these areas are meant to be addressed in the DNLUP. Generally, further clarity with respect to the issue of marine shipping is required.	The revised DNLUP Land Use Designations clarify how marine shipping will be managed. There is limited information that may be used to determine "where" shipping should occur. Instead at this time the Plan identifies where year round shipping would be prohibited. Accessory Uses allows for open water shipping and related ports and winter roads to occur in all land use
BIMC-2	Baffinland	14-Feb-14	DNLUP	3	ECP	Baffinland has reviewed and agrees with the specific comments made by the NWT and Nunavut Chamber of Mines relating to Section 3.1.1.3 ("National Marine Conservation Areas - Lancaster Sound") and Section 3.1.1.2. ("Migratory Bird Sanctuaries").	General comment noted.
BIMC-3	Baffinland	14-Feb-14	DNLUP	4.2.1	BHC	Baffinland has reviewed and agrees with the specific comments made by the NWT and Nunavut Chamber of Mines relating to this section.	General comment noted.
BIMC-4	Baffinland	14-Feb-14	DNLUP	7.2	Cumulative Impacts	In this section, the NPC has noted that as per the NLCA, generally activities identified in Schedule 12-1 of the NLCA are exempt from screening by the Nunavut Impact Review Board ("NIRB"), unless the NPC refers such applications to the NIRB where the NPC has concerns with respect to the cumulative impacts of a Project Proposal in relation to other development activities. This section would be enhanced if it provided more detail with respect to NPC procedure and considerations relating to such determinations.	The Cumulative Impacts referral section of the Plan has been revised to reflect when and when NPC may refer a project proposal for cumulative impacts concerns.
BIMC-5	Baffinland	14-Feb-14	DNLUP	7.8	Legal Non-Conforming Uses	Baffinland suggests that activities that are covered by an existing permit or approval, as that may be amended or renewed from time to time, should be deemed to be an "existing use of land".	Existing rights are outlined under the Nunavut Planning and Project Assessment Act. The Implementation Strategy has been updated
BIMC-6	Baffinland	14-Feb-14	DNLUP	Table 1 - Land Use Designations	ESED	Baffinland suggests that for areas in the ESED-1 Designation, no distinction need be drawn between production mines and advanced exploration projects.	The NPC agrees and the plan has been revised to simplify the designation.

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AD-1	Athabasca Denesuline	11/12/2013			Caribou	<p>Although the Athabasca Denesuline (AD) are located in Northern Saskatchewan, our culture, history and way of life are highly dependent on the health of the Beverly, Ahik, Bathurst and Qaminirjuaq barren ground caribou herds. On behalf of the AD, I would like to notify the Nunavut Planning Commission (NPC) that the AD have a very strong interest in the Nunavut Land Use Plan (NLUP), as any activity that causes stress, or results in a change of usual behaviour and/or diversion of migratory path of the caribou, can impact on the health and condition of these animals. This subsequently impacts on the AD communities that rely on these caribou for sustenance. During our preliminary review of the draft NLUP, we were very concerned that the NLUP contains no restrictions on any land use activities in caribou calving and post-calving areas. We are very concerned about this lack of protection for barren ground caribou herds while they are in Nunavut.</p> <p>We also find it particularly troubling that the NLUP acknowledges the vulnerability of caribou during calving and post-calving periods, as well as the importance of habitats used during those periods, but proposes nothing to protect the caribou or these key habitats. We are very concerned that unless significant revisions to the NLUP occur, areas of crucial caribou habitat will be unprotected from damage that may result from mineral exploration and development and other commercial land uses. If the NLUP remains unchanged, there would also be a lack of effective protection for the caribou themselves during calving and post-calving periods, when they are most vulnerable to disturbance.</p>	<p>The revised DNLUP addresses calving and post-calving areas. Areas where there is no mineral potential have been protected from development. This amounts to nearly 5% of the NSA. Areas where there is believed to be mineral potential or existing mineral rights the Plan proposes cumulative impacts referrals and other Terms to ensure only project proposals that have been screened for impacts will be able to proceed into the regulatory process. The Plan also prioritizes research that needs to be undertaken to better protect caribou.</p>
AD-2	Athabasca Denesuline	11/12/2013			Caribou	<p>We request that the NPC give highest priority to developing ways to provide protection for caribou calving and post-calving areas during development of the final Nunavut-wide land use plan, as caribou are the lifeblood of the north. This protection should include prohibition of industrial development (including mineral exploration) from caribou calving areas and post-calving areas. We will be sending you a petition via mail, signed by over 300 AD that request "that the Nunavut government protects these herds through the protection of calving grounds".</p>	<p>Comment has been addressed above.</p>
AD-3	Athabasca Denesuline	11/12/2013			Caribou	<p>In addition, restrictions on land use activities should be applied to protect caribou from disturbance effects of land use activities around key water crossings and along seasonal migration routes. We have also noticed that the Caribou Protection Measures are not included within NLUP, which are currently applied through the Keewatin Regional Land Use Plan.</p>	<p>The caribou protection measures are not included in the Plan because they are considered duplication of regulations and processes implemented by AANDC and DIOS. As well the measures are dated. If new measures were developed that reflected seasonal migrations of the individual herds these could be considered by plan amendment. Government is ultimately responsible for wildlife and needs to get buy-in on revised caribou protection measures.</p>

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NWTMN-01	Northwest Territory Métis Nation	2/19/2014	DNLUP	2.1.2	Caribou	The NWTMN have a vested interest in the well-being and conservation of caribou in the Northwest Territories and Nunavut. It is come to our attention that the Government of the Northwest Territories is considering permitting exploration and development in areas that are known to be calving and post-calving areas for caribou. The NWTMN opposes development activity in these sensitive areas.	The revised DNLUP addresses calving and post-calving areas. Areas where there is no mineral potential have been protected from development. This amounts to nearly 5% of the NSA. Areas where there is believed to be mineral potential or existing mineral rights the Plan proposes cumulative impacts referrals and other Terms to ensure only project proposals that have been screened for impacts will be able to proceed into the regulatory process. The Plan also prioritizes research that needs to be undertaken to better protect caribou.

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FSMC-1	Fort Smith Métis Council	05/02/2014	DNLUP		Caribou	The Fort Smith Métis People Support the protection of the calving and post calving areas. If exploration and development were allowed in these calving areas this would add extreme pressure to the caribou in the last and most important area, the calving area which remain undisturbed at present. As caribou return to the same area to birth their young we need to protect these areas and not develop them, for the future of the caribou and those who depend on them to survive.	The revised DNLUP addresses calving and post-calving areas. Areas where there is no mineral potential have been protected from development. This amounts to nearly 5% of the NSA. Areas where there is believed to be mineral potential or existing mineral rights the Plan proposes cumulative impacts referrals and other Terms to ensure only project proposals that have been screened for impacts will be able to proceed into the regulatory process. The Plan also prioritizes research that needs to be undertaken to better protect caribou.

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LKDFN-1	Lutsel K'e Dene First Nation	31/01/2014	DNLUP	2.1.2	Caribou	The Lutsel K'e Dene First Nation (LKDFN) has a strong history of survival off of the great abundance the barren lands has to offer. The Lutsel K'e Dene are the caribou-eaters from the East Arm of Great Slave Lake, and as an isolated community, our survival depends heavily on the survival of our main food source, the barren ground caribou. On behalf of the LKDFN, I would like to express our concern to the Nunavut Planning Commission (NPC) regarding the lack of consideration to caribou calving and post-calving areas in the recent draft Nunavut Land Use Plan (NLUP).	The revised DNLUP addresses calving and post-calving areas. Areas where there is no mineral potential have been protected from development. This amounts to nearly 5% of the NSA. Areas where there is believed to be mineral potential or existing mineral rights the Plan proposes cumulative impacts referrals and other Terms to ensure only project proposals that have been screened for impacts will be able to proceed into the regulatory process. The Plan also prioritizes research that needs to be undertaken to better protect caribou.
LKDFN-2	Lutsel K'e Dene First Nation	31/01/2014	DNLUP	2.1.2	Caribou	Though we have historically respected each other's territory and decision-making authority, we urge the NPC to include caribou habitat protection in the NLUP, as the survival of our way of life, and the future of our children is at stake. LKDFN does not view caribou in terms of the Beverly herd, the Ahlak herd, or the Bathurst herd, to us, they are the Caribou, and right now, across the north, Caribou are threatened by development, and declining in populations. The herds that we survive off of all travel into Nunavut for calving and post-calving seasons, and decisions made in your territory to develop, or to protect these priority areas will affect the survival of the Caribou and ultimately, the health of the Lutsel K' e Dene.	Comment has been addressed above.
LKDFN-3	Lutsel K'e Dene First Nation	31/01/2014	DNLUP	2.1.2	Caribou	A caribou summit held in Inuvik, and a West Kitikmeot caribou workshop, both in 2007, identified the necessity of protecting calving grounds and post-calving grounds from development to avoid disturbance to caribou. We understand that the NLUP acknowledges the vulnerability of caribou during the calving and post-calving periods, but without restriction to land use activities during these times, the NLUP is leaving these areas open to exploitation and almost certain losses of caribou populations in the near future. There are significant disturbances along many of the migration routes of the caribou already y, and with projects moving forward in the ca living grounds, LKDFN feels we must urge the NPC to make wise decisions for the sake of the caribou.	Comment has been addressed above.
LKDFN-4	Lutsel K'e Dene First Nation	31/01/2014	DNLUP	2.1.2	Caribou	With mineral exploration and mining potential continually encouraged by the Canadian Government, protection of these vulnerable areas falls to the shoulders of the territorial, Aboriginal and Inuit Governments. LKDFN has been encouraging the Government of the Northwest Territories to be more vocal during environmental assessments that relate to these important areas, especially considering the transboundary nature of the potential impacts. We would encourage the same from the NPC and the Nunavut Government. There are projects moving through the environmental assessment process with the Nunavut Impact Review Board (i.e. Sabina, Glencore, Areva ...) that represent significant public and environmental concern for the Lutsel K'e Dene, and without the protection of the priority caribou habitat in the NLUP, we fear that more exploitation and development could threaten the livelihoods of the caribou.	Comment has been addressed above.
LKDFN-5	Lutsel K'e Dene First Nation	31/01/2014	DNLUP	2.1.2	Caribou	Our recommendation is that all land use activities be restricted in these vulnerable calving and post-calving areas. We hope that more protection can also be applied to important caribou crossings, and along the entire migration route, but understand the NPC must balance land use activities. The Caribou travel across political and territorial boundaries and it takes a concerted effort on all parties to protect various range areas. We believe the calving and post-calving areas are priority protection areas and therefore recommend its consideration.	Comment has been addressed above.
LKDFN-6	Lutsel K'e Dene First Nation	31/01/2014	DNLUP	General	Caribou	We would also like to take this opportunity to invite the NPC to the community of Lutsel K'e for consultation, feedback, and discussion of the NLUP. Please contact Michael Tollis, Wildlife, Lands and Environment Manager, by phone at 867-370-3197, or by email at lkdfnlands@gmail.com.  Thank you for the opportunity to comment, and we look forward to your consideration in this matter. We would like a response to our request at your earliest convenience, preferably before the end of February so that we can review our follow-up and look at our options.	The NPC is not funded to meet with organizations that are not identified under the Nunavut Lands Claims Agreement.

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SDFN-01	Sayisi Dene First Nation	5/15/2014	DNLUP	2.1.2	Caribou	Board members and other meeting participants were alarmed to learn that the DNLUP contains no restrictions on any land use activities in caribou calving and post-calving areas. It is our understanding that Caribou Protection Measures, which are currently applied through the KPLUP, are also absent from the Draft Plan.	The revised DNLUP addresses calving and post-calving areas. Areas where there is no mineral potential have been protected from development. This amounts to nearly 5% of the NSA. Areas where there is believed to be mineral potential or existing mineral rights the Plan proposes cumulative impacts referrals and other Terms to ensure only project proposals that have been screened for impacts will be able to proceed into the regulatory process. The Plan also prioritizes research that needs to be undertaken to better protect caribou.
SDFN-02	Sayisi Dene First Nation	5/15/2014	DNLUP	2.1.2	Caribou	We acknowledge the immense challenges your organization faces in accommodating the long list of issues a land use plan must consider. That being said, we respectfully request that you give high priority to developing ways to provide protection for caribou calving and post-calving areas during development of the final Nunavut-wide land use plan. This protection should include prohibition of industrial development (including mineral exploration) from caribou calving areas and post-calving areas. In addition, restriction on land use activities should be applied to protect caribou from disturbance effects of land use activities around key water crossings and along seasonal migration routes.	Comment has been addressed above.

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GN-01	Government of Nunavut (GN)	28/05/2014	DNLUP	General	General	<b>Comment:</b> Parnautit, the GN Mineral Exploration and Mining Strategy, Ingirrasiliqta, the GN Transportation Strategy, and Tunngasajji, the GN's Tourism Strategy, and Working Together for Caribou, the GN's Caribou Strategy, do not appear to be considered as policy direction in the Plan. NTL has provided direction via the O&R that development activity should not be restricted on IOL. The Plan and O&R documents have considered this direction in developing their recommended options throughout. In the same way, these GN strategies provide direction and policy that should be considered in management options and recommendations. <b>Recommendation:</b> Ensure that the direction and policy included in Parnautit, Ingirrasiliqta, and Tunngasajji and Working Together for Caribou is considered when making land use planning decisions. Make specific reference to these documents as part of the considered information in determining management direction and recommended options.	The NPC has considered these strategies and has made reference where appropriate. An area of 6% identified by AANDC as having high mineral potential is under special management and prohibits the establishment of Parks and Conservation Areas. 15% of the NSA is under a Protected Area designation. 67% is Mixed use. 80% of the NSA allows non-renewable resource development.
GN-02	Government of Nunavut (GN)	28/05/2014	Options and Recommendations	General	General	<b>Comment:</b> Options are not consistent throughout the document. In Chapter 2, designations are roughly as follows: Option 1 allows all activity, Option 2 allows some activity and prohibits all others, Option 3 allows some activity and Option 4 allows additional activity. For Chapter 3, designations are: Option 1 allows some activity and prohibits others, Option 2 allows all activity and Option 3 allows some activity. <b>Recommendation:</b> Be consistent on Option definitions throughout the document, as is appropriate. Where sections have similar options available, list them in the same order.	The Land Use Designations have been clarified in the revised DNLUP. The Options have been revised in the Options and Recommendations Document and are consistent throughout.
GN-03	Government of Nunavut (GN)	28/05/2014	Options and Recommendations	General	General	<b>Comment:</b> Marine Transportation is not included in the options presented throughout the Options and Recommendations document. <b>Recommendation:</b> Include Marine Transportation and shipping as an allowable activity in relevant options throughout the document.	Land and marine transportation corridors are included in the revised Options and Recommendations document.
GN-04	Government of Nunavut (GN)	28/05/2014	DNLUP	General	General	<b>Comment:</b> Mineral exploration activity is not represented and is not considered in determining various options throughout the document. <b>Recommendation:</b> Include exploration activity and consider known mineral potential as represented by this activity wherever it overlaps with other interests.	The revised DNLUP and Options and Recommendations document have considered known mineral potential in determining various options. Comment addressed above.
GN-05	Government of Nunavut (GN)	28/05/2014	Options and Recommendations	Chapter 2	Key Bird Habitat Sites	<b>Comment:</b> Some highly risk intolerant Key Bird Habitat Sites are recommended as Option 2 (Permits tourism, recreation and research and prohibits all other uses), while other highly risk intolerant sites which contain IOL are recommended as Option 3 (doesn't prohibit activity) to incorporate direction provided by NTL. The GN also has policy direction that aims to reduce land access restrictions (The GN Mineral Exploration and Mining Strategy states that the GN requires a review and assessment to determine whether a proposed land access restriction is warranted - Parnautit, Policy Statement 1-2). Options other than Option 2 do not specifically prohibit activity. <b>Recommendation:</b> Do not prohibit activity. Consider GN policy direction in the Commission's consideration of recommended options. In the absence of a review and assessment to determine that a site must be restricted, assign a designation for those highly risk intolerant sites that would consider a project through a plan amendment or to the plan or an impact review. In this way, the sensitivity of the site is reflected, but activities that may co-exist now or in the future can be assessed on their own merit to determine if they are potentially adverse and therefore prohibited.	The Commission broad planning policies, objectives and goals guide the content of the Plan. Over 80% of the NSA allows for mining. Areas which are considered highly risk intolerant are considered as Protected Areas, others are considered Special Management with setbacks to guide the design of the project proposal.
GN-06	Government of Nunavut (GN)	28/05/2014	Options and Recommendations	Chapter 2	Key Bird Habitat Sites	<b>Comment:</b> Several Key Bird Habitat Sites have been designated as Option 2 (development prohibited). However, it does not appear that oil and gas potential or other economic activity was considered in determining this designation. <b>Recommendation:</b> Reassess the Key Bird Habitat Sites to consider oil and gas potential or other economic activities that may benefit from having access to the areas if and where adverse impact can be minimized.	General comment noted. Oil and gas potential has been considered in the Options and Recommendations document. Comment re: designation of bird habitat addressed above.
GN-07	Government of Nunavut (GN)	28/05/2014	Options and Recommendations	Chapter 2, pg. 6	East Axel Heiberg Island (Map 1)	The considered information does not include any oil and gas potential	General comment noted. Oil and gas potential has been considered in the Options and Recommendations document.
GN-08	Government of Nunavut (GN)	28/05/2014	Options and Recommendations	Chapter 2, pg. 6	Fosheim Peninsula (Map 2)	The considered information does not include any oil and gas potential	General comment noted. Oil and gas potential has been considered in the Options and Recommendations document.
GN-09	Government of Nunavut (GN)	28/05/2014	Options and Recommendations	Chapter 2, pg. 11	Foxe Basin Islands (Map 29)	The considered information does not include oil and gas potential.	General comment noted. Oil and gas potential has been considered in the Options and Recommendations document.
GN-10	Government of Nunavut (GN)	28/05/2014	Options and Recommendations/DNLUP	Chapter 2, pg. 9-10; DNLUP Table 1, pg. 38	Cape Graham Moore (Map 19)	<b>Comment:</b> The current recommended option is Option 2, which permits Tourism, Recreation, Research and prohibits all other uses. However, in Table 1 of the Plan, the designation is PSE-3, which permits several uses and does not prohibit use. Furthermore, the considered information does not include commercial fisheries or oil and gas potential. <b>Recommendation:</b> Confirm the designation. <b>Recommendation:</b> Consider all potential for economic activity in the area.	General comment noted. Oil and gas potential has been considered in the Options and Recommendations document. The Options and Recommendations document has been revised.
GN-11	Government of Nunavut (GN)	28/05/2014	Options and Recommendations/DNLUP	Chapter 2, pg. 9-10; DNLUP Table 1, pg. 38	Cape Graham Moore (Map 19)	<b>Comment:</b> There are sites that contain active mineral claims, yet the designation only permits tourism, recreation, and research (Option 3). <b>Recommendation:</b> Clarify how mineral activity will proceed on existing mineral claims.	The Options and Recommendations document has been revised. Under NUPPAA existing rights are protected. The Implementation Strategy has been revised to reflect NUPPAA
GN-12	Government of Nunavut (GN)	28/05/2014	Options and Recommendations	Chapter 2, pg. 10	Northwestern Brodeur Peninsula (Map 20)	Clarify how mineral activity will be allowed to occur on these already existing mineral claims.	Comment addressed above
GN-13	Government of Nunavut (GN)	28/05/2014	Options and Recommendations	Chapter 2, pg. 15	Kagloruak River (Map 45)	Clarify how mineral activity will be allowed to occur on these already existing mineral claims and leases.	Comment addressed above

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GN-14	Government of Nunavut (GN)	28/05/2014	DNLUP		Caribou	<p><b>Calving Areas and Key Access Corridors - Mainland Migratory Herds</b>  <b>Recommendation:</b> Industrial development and activity is not permitted. Prohibited activities: Mineral exploration and production, construction of roads, pipelines and transportation related infrastructure, equipment operation and permanent infrastructure relating to projects and project proposals as defined by the Nunavut Land Claims Agreement (NLCA) and the federal Nunavut Planning and Project Assessment Act (NUPPAA), which would be reviewed by the NPC for conformity. Seasonal restrictions on research not directly related to caribou biology and tourism would be imposed - these activities are not permitted when and where caribou are present, but would be permitted once caribou had left the area. Calving grounds are widely recognized as being of critical importance for maintaining healthy caribou populations. Caribou are especially vulnerable to disturbance during calving and the effects of development cannot be mitigated in these areas. Key Access Corridors are regularly used pathways that lead on and off the calving grounds. These corridors are essential for providing access to calving grounds. Development and/or disturbance along these routes could lead to caribou shifting or abandoning their calving grounds. The core calving areas and key access corridors have been combined for management purposes and appear as one file in GN supplied data.</p>	The revised DNLUP addresses calving and post-calving areas. Areas where there is no mineral potential have been protected from development. This amounts to nearly 5% of the NSA. Areas where there is believed to be mineral potential or existing mineral rights the Plan proposes cumulative impacts referrals and other Terms to ensure only project proposals that have been screened for impacts will be able to proceed into the regulatory process. The Plan also prioritizes research that needs to be undertaken to better protect caribou. This approach has been taken to minimize fragmentation of caribou habitat.
GN-15	Government of Nunavut (GN)	28/05/2014	DNLUP	2.1.2	Caribou	<p><b>Post-calving areas</b>  <b>Recommendation:</b> Seasonal restrictions (June 15 - July 15) on development activity when and where caribou are present. Restricted activities include, but are not limited to, air and vehicle traffic, loud or repetitive noise or vibration disturbances. All season roads are not permitted in these areas to prevent inappropriate access to these herds during vulnerable periods. Winter access roads would be allowed. Post-calving areas are used by caribou for nursing and nutrition uptake. Interrupting nursing and access to good forage can both negatively impact caribou body condition and productivity. Disturbance within post-calving areas can demographically impact caribou populations through higher calf mortality resulting from a reduction in nursing time. Adults can also be affected by displacement from areas with high quality forage required to maintain milk production.</p>	Comment has been addressed above.
GN-16	Government of Nunavut (GN)	28/05/2014	DNLUP		Caribou	<p><b>Rutting Areas - Mainland Migratory Herds</b>  <b>Recommendation:</b> Seasonal restrictions (Oct 10 - Nov 10) on development activity when and where caribou are present. Restricted activities include, but are not limited to, air and vehicle traffic, loud or repetitive noise or vibration disturbances. Rutting areas are acknowledged as areas where caribou are particularly vulnerable to disturbance of the breeding process, which results in lower pregnancy rates. This is also an important time for breeding and pregnant cows to gain added nutrition before the winter. The GN proposes seasonal restrictions in which operators would be required to shut down and cease aircraft and vehicle use while caribou are near operations established within designated rutting areas. Development would continue to be permitted within these areas. Only seasonal restrictions apply. Minimizing disturbances in rutting areas allows for higher reproductive rates.</p>	Comment has been addressed above.
GN-17	Government of Nunavut (GN)	28/05/2014	DNLUP		Caribou	<p><b>Migration Corridors - Mainland Migratory Herds</b>  <b>Recommendation:</b> Seasonal restrictions on development activity when and where caribou are present. Restricted activities include, but are not limited to, air and vehicle traffic, loud or repetitive noise or vibration disturbances. Migration corridors are critical for movement between important areas of caribou ranges. Disturbance and obstacles along the migration route can displace herds and alter access to critical habitat and forage. Migration routes to and from calving and post-calving range and to and from rutting range are essential. Disrupting these migratory routes can lead to a loss of migratory behaviour over time. Caribou populations rely on migration to maximize their access to forage and habitats free of disturbance and thus maximize productivity. If disturbance caused caribou to stop their traditional migratory behaviour, this would substantially lower productivity and abundance, as well as fundamentally change caribou distribution across the landscape, which would dramatically impact subsistence harvesters. Development would continue to be permitted within these areas with seasonal restrictions applying. Minimizing disturbances along the migration route will remove factors that can cause caribou to shift or abandon their migration routes.</p>	Comment has been addressed above.

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GN-18	Government of Nunavut (GN)	28/05/2014	DNLUP		Caribou	<p><b>Sea Ice Crossings - Mainland Migratory Herds</b>  <b>Recommendation:</b> Seasonal restrictions on icebreaking during crossing periods and restrictions on development activity when and where caribou are staging (preparing to cross). Restricted activities include, but are not limited to, air and vehicle traffic, loud or repetitive noise or vibration disturbances. Some caribou herds migrate across sea ice to reach their calving areas. These herds are vulnerable to changing sea ice conditions, and injury and increased mortality by drowning resulting from ice breaking activities.  Development would only be restricted from a small area. Shipping in the open water season is not affected. There is no icebreaking activity currently in these areas.</p>	The revised DNLUP has addressed Caribou Sea Ice Crossings. Without information that provides with seasonal restrictions it is difficult to manage impacts with certainty.
GN-19	Government of Nunavut (GN)	28/05/2014	DNLUP		Caribou	<p><b>Seasonal Ranges - Mainland Migratory Herds</b>  <b>Recommendation:</b> No restriction on development, but proposed projects should consider impacts on caribou and reduce disturbance as much as possible. In order to reach conformity, the project proposal must demonstrate consideration for caribou seasonal ranges in recognizing potential impacts identifying proposed mitigation measures.  These vast areas of Nunavut are important for the survival and success of caribou herds. It is unrealistic to restrict mineral exploration projects in these areas, however, proposed projects should include particular elements aimed at reducing disturbance to caribou wherever possible. The GN proposes that a recommendation be made to regulators and proponents to consider potential impacts that may impede the ability of caribou to effectively access summer and winter range and ensure feeding behavior is not significantly disrupted. The NPC would consider cumulative effects.</p>	The recommendation cannot be implemented as part of the conformity determination decision making process. The Plan is part of an integrated regulatory process in which NIRB developments mitigation measures.
GN-20	Government of Nunavut (GN)	28/05/2014	DNLUP	3.1	Territorial Parks	<p><b>Territorial Parks Awaiting Full Establishment</b>  <b>Recommendation:</b> Designation which would allow tourism, research and recreation (ECP-2). Recommend all other uses are considered through a Plan amendment and that proponents must adhere and respect the purposes for which the park was created as well as the obligations and processes as outlined under the NLCA/ IBA for Territorial Parks*.  Territorial Parks Awaiting Full Establishment are approved parks that have existed and been treated as Territorial Parks for years and are listed under Schedule 2.1 of the Umbrella Inuit Impact and Benefit Agreement for Territorial Parks (signed in 2002), but for various reasons have not yet been legally designated under the Territorial Parks Act.  They are two reasons for this:  1. Land Tenure - Awaiting transfer of Federal Crown Lands to the Commissioner, completing Legal Surveys, Commissioners Land transfers of Administration and Control between departments, etc...  2. Conformance with new processes outlined in the NLCA/IBA - Amendments to exclude/include Inuit Owned Lands, Co-management, Park-Specific Appendices, etc...  * The Umbrella IBA for Territorial Parks provides for a two-tier co-management committee structure to provide advice to the GN on all policy matters and significant decisions related to planning, establishment, operations and management of Territorial Parks. The co-management regime is made up of appointed representatives from the GN, NTI, RIAs' and affected community/ies. Among other responsibilities, its activities include: compiling inventories of the areas geological and mineral resources, wildlife populations, archaeological sites and specimens, topology, etc...</p>	The Land Use Designations have been clarified in the revised DNLUP. Protected Areas and Special Management Area land use designations are used to manage land use. The Commission's broad planning policies objectives and goals guide the content of the Plan. The Plan prohibits uses such as mining and all weather roads in proposed Parks. Once the Park is established the GN should advise the NPC as the Plan will no longer apply. The change will be easily accommodated by a plan amendment.
GN-21	Government of Nunavut (GN)	28/05/2014	DNLUP	3.1	Territorial Parks	<p><b>The Territorial Parks awaiting full establishments are:</b>  Baffin Region  Katannilik Territorial Park (Kimmirut/Iqaluit)  Mallikjuaq Territorial Park (Cape Dorset)  Sylvia Grinnell Territorial Park (Iqaluit)  Pisuktnu Territorial Park Campground (Pangnirtung)  Tamaarvik Territorial Park Campground (Pond Inlet)  Taqaqsiqvik Territorial Park Campground (Kimmirut)  Tupirvik Territorial Park Campground (Resolute Bay)  Kitikmeot Region  Kugluk (Bloody Falls) Territorial Park (Kugluktuk)  Ovayok Territorial Park (Cambridge Bay)  Northwest Passage Territorial Park (Gjoa Haven)  Kivalliq Region  Iqaqarjariup Nunanga Territorial Park (Rankin Inlet)  Inuujarvik Territorial Park Campground (Baker Lake)  Of these, the only Territorial Parks awaiting full establishment that are outside of municipal boundaries are parts of Katannilik Territorial Park and parts of Sylvia Grinnell Territorial Park.</p>	Comment has been addressed.

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GN-22	Government of Nunavut (GN)	28/05/2014	DNLUP	3.1	Territorial Parks	<p><b>Proposed Territorial Parks Recommendation:</b> The creation of new ECP-R2 category. Designation which would allow tourism, research and recreation. Proponents must be made aware that a territorial park is under consideration, and therefore must adhere and respect the obligations and processes as outlined under the NLCA/ IIBA for Territorial Parks.</p> <p>Proposed territorial parks are areas that have undergone considerable background and feasibility study, have community and RIA support and have been approved by the Government of Nunavut to proceed in accordance to the legal obligations and planning processes as outlined under the Nunavut Land Claims Agreement (NLCA) and approved Umbrella Inuit Impact and Benefit Agreement for Territorial Parks in the Nunavut Settlement Area (IIBA).</p> <p>*The Umbrella IIBA for Territorial Parks provides for a two-tier co-management committee structure to provide advice to the GN on all policy matters and significant decisions related to planning, establishment, operations and management of Territorial Parks. The co-management regime is made up of appointed representatives from the GN, NTL RIAs' and affected communities. Among other responsibilities, its activities include: compiling inventories of the areas geological and mineral resources, wildlife populations, archaeological sites and specimens, topology, etc. Proposed territorial parks are under consideration for establishment under the Territorial Parks Act but final Government approval has yet to be received.</p> <p>The only current Proposed Territorial park is: Aggutinni Proposed Territorial Park (Clyde River)</p>	Comment has been addressed.
GN-23	Government of Nunavut (GN)	28/05/2014	DNLUP	3.1.1.3	Proposed National Marine Conservation Areas	<p><b>Comment:</b> In the Draft LUP (S. 3.1.1.3 pg. 21 and Table 1 pg. 39), Lancaster Sound is designated as ECP-1, which permits Tourism, Recreation, and Research and prohibits all other uses. However, it is unclear what this means for shipping through Lancaster Sound.</p> <p><b>Recommendation:</b> Create a designation similar to PSE-3, and that permits marine transportation.</p>	The DNLUP has been revised to clarify management of project proposals within the Lancaster Sound proposed NMCA.
GN-24	Government of Nunavut (GN)	28/05/2014	DNLUP	3.1.1.3	Proposed National Marine Conservation Areas	<p>The current recommended option is Option 1 (O&amp;R Ch. 3, pg. 25-26), which permits Tourism, Recreation and Research and prohibits all other uses. The considered information does not include marine transportation use.</p> <p><b>Recommendation:</b> Create an option permits marine transportation.</p>	The DNLUP land use designations have been revised to clarify the requirements of each land use designation.
GN-25	Government of Nunavut (GN)	28/05/2014	DNLUP	3.1.2.4	Historic Sites	<p><b>Comment:</b> It is the opinion of the GN that NPC has no jurisdiction to designate historic sites that are within municipal boundaries because municipal lands are under the administration and control of the municipalities themselves, as per Article 14 of the Nunavut Land Claims Agreement (NLCA). Moreover, Article 11.7.4 of the NLCA states that: "The NPC and municipal planning authorities shall cooperate to ensure that regional and municipal land use plans are compatible." Given the two above-mentioned NLCA references, we believe that designation of historic sites within municipal boundaries ought to rest with municipal planning authorities. We are concerned that if these sites are permitted to be included within the Nunavut Land Use Plan without further clarification of designated authority, would imply to readers that it is NPC, not municipal planning authorities, have the authority to designate historic sites.</p> <p><b>Recommendation:</b> A new option should be created that makes specific reference to municipal authority to designate historic sites within municipal lands and that such sites not be included in the final Nunavut Land Use Plan (the Plan). If NPC still thinks it best to have such sites as part of the Plan, the GN proposes to create a new option which states that designation of historic sites within municipal boundaries must be consistent with municipal plans, as per Article 11.7.4 and similar to NPC's approach "Community Drinking Water Supplies". In this way, a municipality would first designate a proposed historic site, via municipal planning processes, and this designation would only later be included in the Plan, for the purpose of remaining consistent with the municipal plan. When referring to Historic Sites we are specifically referring to those contained within Municipal Boundaries and that are not current or future National Historic Sites (NHS). We are not proposing a change to the chosen "Option 2" for historic sites outside of Municipal Boundaries, which we believe to be within NPC's mandate. Moreover, we acknowledge that all parties are subject to federal and territorial legislation (e.g. federal NHS designation), regardless of whether or not such sites are located within municipal boundaries.</p>	NLCA Article 9 establishes conservation areas. The National Historic Sites and Historic Places are decided by relevant government legislation. NLCA 9.3.5 states that Article 11 shall apply to conservation areas. A mixed use land use designation has been applied to municipalities.
GN-26	Government of Nunavut (GN)	28/05/2014	DNLUP	3.1.2.5	Heritage Rivers	<p><b>Comment:</b> The GN supports the NPC's recommendation of assigning a designation that permits all uses in these areas, and that proponents should refer to the management plan for each river system.</p> <p><b>Recommendation:</b> Strengthen the ECP-R1 designation by making the recommendation a conformity requirement. Project proposals must demonstrate consideration for the management plan for the Heritage River in question to reach conformity. This would apply to both existing and nominated Heritage Rivers.</p>	The DNLUP has been revised.

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GN-27	Government of Nunavut (GN)	28/05/2014	DNLUP	4.2.1	Transportation Infrastructure	<p><b>Comment:</b> The transportation section in the draft LUP (S. 4.2.1 pg. 25 and Table 1 pg. 40) and O&amp;R document (Ch. 4 pg. 32-33) acknowledges proposed routes and existing routes in a general fashion, but provides specific examples in their Maps of proposed (Nunavut-Manitoba) and existing (Meadowbank, Milne Tote) roads. It should be clear if all proposed transportation routes are being considered in the Plan. Examples include, but are not limited to, BIPR and the Steensby Inlet rail line. It should be clear that any existing transportation routes are considered in the Plan. Examples include the Nanisivik Road and the YK-Contwoyto winter road.</p> <p><b>Comment:</b> Other transportation infrastructure is not discussed, such as the proposed port at Steensby, the proposed port associated with BIPR, or existing docks/ harbours or trails.</p> <p><b>Recommendation:</b> In the draft LUP, trails, docks, and harbours should be included activity in BHC-1 and BCH-2. Options 1 through 6 in the O&amp;R document should include trails, docks and harbours in addition to roads, railways and utilities.</p> <p><b>Recommendation:</b> Clarify whether proposed infrastructure, in addition to roads, will include all those currently being proposed.</p>	The DNLUP has been revised to reflect how transportation routes. The discussion on transportation has been further elaborated on in the Plan. Accessory uses include winter roads, open water shipping and ports as permitted in all land use designations but subject to other authorizations.
GN-28	Government of Nunavut (GN)	28/05/2014	DNLUP	4.2.1	Transportation Infrastructure	<p><b>Comment:</b> Marine Transportation is not included in the proposed designations in the draft LUP or in the options presented in the O&amp;R document. Marine Corridors (shipping routes) should be included in both the draft LUP and the O&amp;R document in the same way that terrestrial transportation corridors (roads) are.</p> <p><b>Recommendation:</b> In the draft LUP, include 'marine transportation' as an acceptable activity in PSE-3 in Table 1. Include designations that incorporate Marine Transportation within relevant options in the O&amp;R document. Include any current Marine Transportation Corridors and shipping routes.</p>	Land and marine transportation corridors are included in the revised Options and Recommendations document.
GN-29	Government of Nunavut (GN)	28/05/2014	DNLUP	4.3	Alternative Energy Sources	<p><b>Alternative Energy Sources</b></p> <p><b>Comment:</b> As presented in the O&amp;R, NPC recommends establishing a 100m setback around infrastructure to restrict development within this area. The GN has three concerns with this proposed setback: 1. If "infrastructure" includes transmission lines a 100m setback might be excessive for transmission lines; 2. Any setback from transmission lines, if implemented, would be impossible to achieve within municipal boundaries given existing and proposed land development; and, 3. Given Article 11.7, municipalities ought to have some say into what can occur within the setbacks, given that these areas might have important community use (e.g. transportation, recreation, hunting), even when outside of municipal boundaries. We are not proposing that high-impact activities be permitted in these areas, but activities that would be considered "manifestly insignificant" under the definition of "project" in the Nunavut Planning and Project Assessment Act.</p> <p><b>Recommendation:</b> To remedy our concerns, we suggest: that a reduction of the setback for transmission lines might be appropriate; to clarify in the Plan that setbacks do not apply within municipal boundaries; and, to ensure that communities be given some authority to regulate "manifestly insignificant" activities within setbacks, even if outside of municipal boundaries.</p>	The Options and Recommendations document and the DNLUP have been revised.
GN-30	Government of Nunavut (GN)	28/05/2014	DNLUP	4.3	Alternative Energy Sources	<p><b>Comment:</b> This section should have a brief overview on hydro potential within the territory and not be specific, including set back requirements. These are desktop studies. "The Qulliq Energy Corporation (QEC) completed a study "Iqaluit Hydro-electric Generation Sites: Identification and Ranking" (2006) which identified Jaynes Inlet (Qikigijavik) as having high potential for hydro-electrical generation." These are only some of the potential developments. Armshow South is not listed.</p> <p><b>Recommendation:</b> Option 1 should be the preferred option as these are potential sites only. Any hydro project will have to go through the NIRB process as they will fall outside of the municipal boundary. Option 1 instead of Option 2 is best for the Jaynes Inlet (Qikigijavik) site and the Quoiq River as it best reflects the intent of Building Healthy Communities and; Option 1 is recommended instead of Option 3 for the Thelon River site. Again the regulatory process would address the issues while taking into account the various stakeholders in the regulatory process.</p>	The Armshow South site is within a Territorial Park Awaiting Full Establishment and as such is designated as a Protected Area under the Draft Plan.
GN-31	Government of Nunavut (GN)	28/05/2014	DNLUP	4.4.1	Community Drinking Water Supplies	<p><b>Recommendation:</b> The GN would like to express its strong support for the decision of NPC to review each of Nunavut's Community Plans and assign a separate option for each community based on compliance with the Community Plan. Given Article 11.7.4, we feel that this is an entirely appropriate method for decision-making for the protection of community drinking water supplies.</p>	General comment noted.
GN-32	Government of Nunavut (GN)	28/05/2014	DNLUP	4.4.4	Aerodromes	<p><b>Recommendation:</b> The GN would like to express its strong support for the decision of NPC to choose "Option 1: Assign a designation that permits all uses" for areas within aerodromes (as defined by Airport Zoning Regulations under the Aeronautics Act). We believe that choosing any other option, which would restrict land use within aerodromes in some manner, would be entirely inappropriate since most community sites are located within aerodromes and include a variety of land uses therein.</p>	The DNLUP has been revised which continues to support the GN's recommendation.
GN-33	Government of Nunavut (GN)	28/05/2014	DNLUP	5.1	Encouraging Sustainable Economic Development	<p><b>Comment:</b> Mineral Exploration and Production, Oil and Gas Exploration and Production, and Commercial Fisheries are included in both the draft LUP (Ch. 5, pg. 30) and the O&amp;R document (Ch. 5, pg. 44). However, tourism, commercial harvests, and cottage industries such as arts and crafts, sports hunting and fishing are other economic development industries and are not incorporated. Tourism has been permitted in various land use designations and options in Chapters 2, 3, and 4. Carving stone locations are being inventoried and identified, and this industry is relevant to local economies.</p> <p><b>Recommendation:</b> Include Tourism and Commercial Harvest, and a discussion on other local industries in the draft LUP and the O&amp;R document. The GN can provide locations of Carving Stone sites to be incorporated into the Plan.</p> <p><b>Recommendation:</b> Similar to the other industries discussed, include text to introduce the Tourism industry in the Plan. Include a definition of tourism.</p>	The DNLUP has been revised to take into account tourism and commercial harvesting. NLCA Article 9 part 9 gives exclusive rights to designated Inuit Organizations regarding rights to carving stone. Information regarding leases and/or Inuit Owned Lands exchanged to recognize this right has not been provided to the Commission. Inuit have exclusive rights to remove carving stone without permits, therefore the land use is not a project proposal. Due to the lateness of the GN submission the NPC was unable to take this recommendation into account at this time.

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GN-34	Government of Nunavut (GN)	28/05/2014	DNLUP	5.1	Encouraging Sustainable Economic Development	<p><b>Introduction:</b> Nunavut seeks to achieve consistent, sustainable growth in the tourism industry that provides benefits for Inuit and all Nunavummiut. The Nunavut Economic Development Strategy recognizes tourism development as a key component in the economic development of our communities and businesses. Tourism will be a dynamic, sustainable industry that showcases our outstanding and unique natural, cultural and recreational resources, and contributes to a high quality of life for Nunavummiut. In Nunavut, the tourism sector is comprised of licensed tourism operators and establishments that include outfitters and hotels and restaurants, as well as airlines, cruise ships, and community-based businesses such as arts and crafts businesses and taxis.</p> <p><b>Definition:</b> Tourism: the activities of persons traveling to and staying in places outside their usual environment for not more than one consecutive year for leisure, business and other purposes.</p>	The DLUP has been revised.
GN-35	Government of Nunavut (GN)	28/05/2014	DNLUP	5.1.1	Mineral Exploration and Production	<p><b>Mineral Exploration and Production</b> Comment: Consideration of Mineral Exploration and Production in both the draft LUP (S. 5.1.1, pg. 31 and Table 1 pg. 43) and O&amp;R document (Ch. 5 pg. 44) is deficient. While mineral exploration and production is considered "one of the most attractive and viable economic activities in the NSA" and the NPC "recognizes the importance of this industry to Nunavut's economy", exploration activity is entirely absent and several projects in more advanced stages are not included while others are. There is no information on known areas of mineral potential, and no consideration of mineral exploration has been included in previous chapters.</p> <p><b>Recommendation:</b> Include mineral exploration activity to indicate where known mineral potential exists. This exploration activity should be considered and incorporated throughout previous chapters where relevant in determining recommended options for management.</p> <p><b>Recommendation:</b> Include other advanced projects, such as (but not limited to) Back River, Chidiak, Roche Bay</p>	The Options and Recommendations Document and the DNLUP have been revised to take into account the GN Mineral Exploration and Mining Strategy.
GN-36	Government of Nunavut (GN)	28/05/2014	DNLUP	5.1.1	Mineral Exploration and Production	<p><b>Comment:</b> It should be acknowledged that despite having some understanding of known mineral potential, that all of Nunavut is considered to have mineral potential. In the GN Mineral Exploration and Mining Strategy, the GN states that "a strong and sustainable mining industry will have operating mines throughout the territory providing employment and business opportunities. This will require a high level of exploration activity resulting in new mineral discoveries and developments." Furthermore, the Mining Strategy states that the GN requires a review and assessment to determine whether a proposed land access restriction is warranted...endeavoring to ensure the goals of the proposed land access restriction are achieved while minimizing the impact on undiscovered mineral resources. (Parnautit, Policy Statement 1-2). Therefore, flexibility in a land use plan that allows access to lands for exploration where activities can co-exist is a necessary step toward ensuring a strong minerals industry in Nunavut.</p> <p><b>Recommendation:</b> Recognize and acknowledge in both the Plan and Options and Recommendations documents that all of Nunavut may have mineral potential. As such, prohibiting access must be minimized. Plan amendments or an impact review of any activity will consider whether a proposed activity can co-exist or is potentially adverse and therefore prohibited.</p> <p><b>Recommendation:</b> In this chapter of the Options and Recommendations document, make reference to Parnautit, the GN's Mineral Exploration and Mining Strategy, as policy direction by the GN. In this chapter, make reference to any management direction provided in previous chapters based on existing exploration activity and on Parnautit Policy Statement 1-2.</p>	The Options and Recommendations Document and the DNLUP have been revised to take into account the GN Mineral Exploration and Mining Strategy.
GN-37	Government of Nunavut (GN)	28/05/2014	DNLUP	5.1.2	Oil and Gas	<p><b>Comment:</b> Sverdrup and Baffin Bay oil and gas potential is noted here. However, other areas of oil and gas potential are not. It should be acknowledged that there is very little information about oil and gas potential across Nunavut; geosciences and exploration will advance our knowledge of any potential. Therefore, flexibility in a land use plan that allows access for geosciences and exploration is necessary.</p> <p><b>Recommendation:</b> In both the draft LUP and O&amp;R document, include all areas of known oil and gas potential, including locations of previous activity and wells. The GN can provide some information on this. This activity should be considered and incorporated throughout previous chapters in determining recommended options for management. <b>Recommendation:</b> Acknowledge that information is lacking and emphasize that continued geosciences and exploration is needed to better understand potential. As such, prohibiting access should be minimized.</p>	The oil and gas activity has been taken into consideration. The DNLUP has designated Significant Discovery Licenses (SDLs). The majority of the NSA permits oil and gas exploration. Due to the lateness of the GN submission the NPC was unable to take this recommendation into account at this time.
GN-38	Government of Nunavut (GN)	28/05/2014	DNLUP	5.1.3	Commercial Fisheries	<p><b>Recommendation:</b> Option 1 provides the room for Encouraging Sustainable Economic Development of existing fisheries and also allows for the possibility that other commercial fisheries may develop.</p>	General comment noted.
GN-39	Government of Nunavut (GN)	28/05/2014	DNLUP	6	Mixed Use	<p><b>Comment:</b> Areas of Opportunity in the Options and Recommendations document and Mixed Use in the draft Plan appear to be the same thing.</p> <p><b>Recommendation:</b> Clarify which term will be used and be consistent between the Plan and the Options and Recommendations document.</p>	The term Mixed Use will be used throughout both the DNLUP and the Options and Recommendations document.

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ENR-01	Department of Environment and Natural Resources (GNWT)	2/13/2014	DNLUP	2.1.2	Caribou	ENR has reviewed the draft plan and has comments related to the protection of caribou habitat. Many of the barren-ground caribou herds in Nunavut are shared with the NWT. Management of these herds should also be shared, particularly as some of these trans boundary herds are in decline or stable but at low numbers. Based on our understanding, this means that while proponents must consider impacts on caribou calving habitat, post calving habitat, migration routes, and sea ice crossing, these areas are not protected from human disturbance. ENR is also concerned that recommendations in the draft NLUOP do not ensure adequate mitigation of individual project effects or the cumulative effects of multiple developments on caribou and caribou habitat.	The revised DNLUP addresses calving and post-calving areas. Areas where there is no mineral potential have been protected from development. This amounts to nearly 5% of the NSA. Areas where there is believed to be mineral potential or existing mineral rights the Plan proposes cumulative impacts referrals and other Terms to ensure only project proposals that have been screened for impacts will be able to proceed into the regulatory process. The Plan also prioritizes research that needs to be undertaken to better protect caribou.
ENR-02	Department of Environment and Natural Resources (GNWT)	2/13/2014	DNLUP	2.1.3	Caribou	ENR is particularly concerned that recommendation in the draft NLUOP will not ensure protection of caribou when they are most vulnerable to disturbance. For example, demands on lactating cows are high during calving and post-calving periods so disturbance during this time will limit the ability of cows to feed calves. ENR encourages the NPC to reconsider its approach to caribou habitat protection in the DNLUP. One method of protection could be timing restrictions on industrial activity to exclude activity during the critical calving and post-calving periods. Another approach could be to set cumulative effects thresholds for land disturbance in these very important habitats. NPC could also consider re-instating and updating the Caribou Protection Measures that would govern industrial activity based on where the caribou are, and could give special recognition and protection to traditional water crossings.	The DNLUP has been revised to address calving and post-calving areas. At this time the NPC is not coordinating the development of thresholds. The Commission's broad planning policies, objectives and goals require the NPC to implement thresholds and indicators developed by government and other IPGs. The Plan has been revised to identify in which specific situations the NPC may refer a project for cumulative impact concerns.
ENR-03	Department of Environment and Natural Resources (GNWT)	2/13/2014	DNLUP		Caribou	ENR is facilitating the development of a range plan to guide land use decision made by NWT and Nunavut management authorities on the historic range of the Bathurst barren-ground caribou herd. The range plan will recommend approaches to monitor cumulative land disturbance and identify when action should be taken in the form of mitigation, best practices, reclamation and/or suspension of certain activities. This is a collaborative process that the GN and other organizations in Nunavut have been asked to participate in. NPC is encouraged to refer to this guidance in the plan in future revisions of the draft NLUOP or as operational guidance for cumulative effects referrals in the Bathurst range.	General comment noted.

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AHTO-01	Arviq HTO	2/10/2014	DNLUP	2.1.2	Caribou	We Arviq Hunters & Trappers Organization of Repulse Bay fully support to protect our caribou from mineral explorations which Lutsel K'e Dene fear that explorations could threaten the livelihood of the caribou.	The revised DNLUP addresses calving and post-calving areas. Areas where there is no mineral potential have been protected from development. This amounts to nearly 5% of the NSA. Areas where there is believed to be mineral potential or existing mineral rights the Plan proposes cumulative impacts referrals and other

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BLHTO-1	Baker Lake HTO	05/11/2013	DNLUP		Caribou	<p>A resolution was unanimously passed in the Kivalliq Wildlife Board dated February 19-21, 2013 to protect all calving and post calving grounds in Nunavut, supported by Kitikmeot and Qikiqtaaluk Wildlife Board. The board members as well as residents of Baker Lake oppose mining and exploring in the Beverly and Qamaniirjuaq calving grounds. Inuit of Baker Lake have a unique inland culture. We rely mostly on caribou to sustain our inland culture and lifestyle. The mining/exploration already has an impact on caribou hunting culture and lifestyle.</p> <p>Baker Lake HTO is firmly and adamantly opposed to any and all mineral exploration and mining in caribou calving areas. Baker Lake HTO board of directors and the residents of Baker Lake are concerned about mining and exploration companies disturbing the caribou calving and post calving grounds.</p>	<p>The revised DNLUP addresses calving and post-calving areas. Areas where there is no mineral potential have been protected from development. This amounts to nearly 5% of the NSA. Areas where there is believed to be mineral potential or existing mineral rights the Plan proposes cumulative impacts referrals and other Terms to ensure only project proposals that have been screened for impacts will be able to proceed into the regulatory process. The Plan also prioritizes research that needs to be undertaken to better protect caribou. This approach has been taken to minimize fragmentation of caribou habitat.</p>

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QIA-1	Qikiqtani Inuit Association	14/02/2014	Working Together		Community Notifications	The Qikiqtani Inuit Association is proposing a method to continuously involve communities in the land use planning and project review processes. The first step is to introduce a requirement for community notification and consultation into the conformity determination stage of project review.	General comment noted. This has been taken into account in the revised DNLUP. The Plan discusses the importance of including residents early in the design phase of project proposals. The Plan encourages engagement but is it "mandated" to impose consultation requirements. The NPC will be automating the review of project proposals and the NPC will be notifying communities of activities. We do not believe that the NPC is "mandated" to impose consultation requirements.
QIA-2	Qikiqtani Inuit Association	14/02/2014	Working Together		Community Notifications	QIA has proposed a mechanism in the consultation guide to involve communities early on in the conformity determination process so that they can be informed of activities that could impact the land or water within, or adjacent to, their community boundaries. This engagement early on will provide certainty and also solidify relationships between proponents and communities. QIA is taking the stance that the NLUP can apply to IOL if this means that there will be better engagement with communities early-on and also that Inuit are able to be active decision makers on potential land use activities on Crown Land near their community boundaries.	General comment noted. This has been taken into account in the revised DNLUP.
QIA-3	Qikiqtani Inuit Association	14/02/2014	Working Together/DNLUP		Plan amendment	QIA is also of the opinion that the Nunavut Land Use plan remain a fluid document which would be amendable as the values of community members may change over time.	The Implementation Strategy section regarding Periodic Review and Monitoring has been revised to address the concern.
QIA-4	Qikiqtani Inuit Association	14/02/2014	Working Together/DNLUP		Public Registry	As per section 4.3.7 of the NPC Implementation document, QIA requests that the NPC provide the resources to host an on-line registry of Proponent Consultation Reports as well as respective Community Checklists for each project.	NUPPAA outlines the requirements for the content of the online public registry. Comment addressed above
QIA-5	Qikiqtani Inuit Association	14/02/2014	Working Together/DNLUP		Notification	Section 4.3.3 & 4.3.4. In order to be consistent with the requirements of the consultation/notification guidelines QIA recommends that section 4.3.3 of the implementation document indicate that the project proposal must also include the Proponent Consultation Report (Form 1 in the consultation guide) that the proponent is required to submit to NPC for conformity determination.	General comment noted.
QIA-6	Qikiqtani Inuit Association	14/02/2014	Working Together/DNLUP		Notification	4.3.7 - In this section of the document it states that " NPC will also notify affected communities than an application has been received in accordance with the Notification Guidelines" QIA request further detail on how the affected communities will be notified, will this also be through the online public registry or will a different mechanism be used to contact these communities?	Refer to the revised DNLUP.
QIA-7	Qikiqtani Inuit Association	14/02/2014	Working Together/DNLUP	4.3.8	Notification	4.3.8 b) According to this section of the implementation document once the project proposal application is complete, NPC will " establish if the proposal is contemplated in the area in which is it proposed and what, if any, recommendations or standards may apply to that location. QIA recognizes that NPC's conformity determination is quantitative and not qualitative, however we suggest that any recommendations or standards that are applied to a conformity determination take into consideration the comments and community feedback as outlined in the consultation report (Form 2 in consultation guide) issued to NPC in accordance with the notification/ consultation guidelines.	The revised DNLUP outlines a notification process as part of an automated conformity determination process. The QIA proposal suggests that a party other than the NPC review the project and determine conformity. The NPC is unable to mandate the conformity determination decision to a third party.
QIA-8	Qikiqtani Inuit Association	14/02/2014	Working Together/DNLUP	5.4	Project Monitoring	Section 5.4: Project Monitoring: QIA questions why the NPC plans on conducting site visits and reviewing permits, licenses and authorization issued by regulatory agencies. Is this not duplicating what is already done by authorizing agencies? What additional value is there to NPC conducting these visits?	As per the NLCA section 11.4.4(i) the NPC shall monitor project to ensure that they are in conformity with land use plans.
QIA-9	Qikiqtani Inuit Association	14/02/2014	DNLUP	General	IOL	QIA has noted that the proposed management areas in the Draft NLUP are similar to the land selection criteria for Inuit Owned Lands as outlined in Article 17 of the Nunavut Land Claims Agreement. The proposed management plans in the DNLUP are: <ul style="list-style-type: none"> <li>• Protecting and Sustaining the environment</li> <li>• Encouraging conservation planning</li> <li>• Building Healthier communities</li> <li>• Encouraging Sustainable Economic development</li> </ul> In comparison, the selection criteria of Inuit Owned Land parcels are: <ul style="list-style-type: none"> <li>• Conservation</li> <li>• Cultural importance</li> <li>• Commercial or economic value</li> <li>• Wildlife harvesting areas .</li> </ul> The purposes of Inuit Owned Land Parcels and land use designations in the (Qikiqtani region have been established and recorded for this region. QIA notes the importance of ensuring that the original purpose of the IOL parcels correspond with the land use designation in the corresponding proposed management plan in the DNLUP.	The Goals of the Plan were developed in consultation with NTL, federal and territorial governments. The GN in particular also have documented similar goals. If the QIA would like to include the noted information in the land use planning process it will need to submit the information to the NPC. Data sources require relevant shapefiles and related validation. The QIA can provide additional information at the Public Hearing to through plan amendment.
QIA-10	Qikiqtani Inuit Association	14/02/2014	DNLUP/Options and Recommendations Document	3.1.1.3	Lancaster Sound NMCA	Throughout the feasibility study , QIA has been conducting community consultations and has collected Inuit Qaujimatugangit (IQ). In 2012, based on feedback from these consultations, QIA proposed a different boundary for the Lancaster Sound NMCA, which is larger than the area delineated by ECP-1 (79). The feasibility study for the NMCA is anticipated to be completed by the end of 2014, at this time the Steering committee will make a recommendation on the feasibility of the NMCA as well its final boundary . If upon completion of the feasibility study the boundary of the Lancaster Sound NMCA differs from that in the DNLUP, QIA would like to ensure that this change is reflected in the NLUP. How could the NPC accommodate a change in the boundary of the Lancaster NMCA if this was made prior to the completion of the NLUP and if it was made after the completion of the NLUP?	The QIA or Government is able to request a Plan amendment for the revised boundary at any point in time. NUPPAA further allows NPC to take into account the consultation undertaken as part of Park establishment. This would streamline the timeline for a plan amendment.

QIA-11	Qikiqtani Inuit Association	14/02/2014	Working Together		Cumulative Impacts/Aerial Surveys	QIA believes that due to the high level of concern surrounding aerial surveys as well as the potential cumulative effects of numerous project proposals for aerial surveys, they should require a conformity determination from NPC and should be subject to the conditions of the consultation/notification guidelines developed by QIA. Section 12.3.3 of the NLCA states that the "NPC may refer a project proposal falling within Schedule 12-1 to NIRB for screening, where the NPC has concerns respecting the cumulative impacts of the project proposal ..." QIA strongly recommends that aerial surveys in the Qikiqtani region should be subject to a conformity determination from NPC for the reasons outlined in section 12.3.3 of the NLCA.	The DNLUP has been revised to consider the impacts of aerial surveys and cumulative impacts. The Plan specifically establishes when and where referrals may occur from cumulative impacts concerns.
QIA-12	Qikiqtani Inuit Association	14/02/2014	DNLUP/Options and Recommendations Document	Chapter 3	Soper River/ECP	Regarding the Soper River watershed, QIA believes that the entire Soper River watershed outside of Katannilik Park should be designated as ECP-R1.	As per the approved 11.4.1(a) document, it is an objective of the NPC to manage land use in and around areas of biological importance, conservation areas, areas of significance to Inuit, areas of interest or areas adjacent to National or Territorial Parks.

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KIA-01	Kitikmeot Inuit Association	4/11/2014	DNLUP	General	Land Use Designation	<p>The KIA recommends that all surface IOL parcels in the Kitikmeot be designated as "Mixed Use" under the draft and final NULP.</p> <p>a. This designation is appropriate because it reflects the purpose of the IOL selected under Article 17 of the NLCA a mixed use designation will enable Inuit to use the land as they see fit and to exercise their rights as landowners to act as the stewards of their own lands. Kitikmeot Inuit want sustainable economic development, and they also want the opportunity to harvest for subsistence, all in the same general area. The best way to achieve these goals is to leave the discretion about land uses with the owners. This approach empowers Inuit and leaves the responsibility for land use decisions with the communities.</p> <p>b. The KIA regularly consult with the communities. Most of the time, the KIA uses a "mixed use" approach to managing multiple uses of IOL. Mixed use can range from resource development to conservation. On rare occasions a small number of IOL parcels in the Kitikmeot have been designated for only one purpose (i.e. conservation purposes), but the KIA wishes to maintain its discretion on these decisions. Because surface IOL is privately owned, the KIA wishes to maintain the right to decide how land is used, including any potential and reasonable closure to development.</p>	As per NLCA 11.4.1(a) broad planning policies, objectives and goals for the NSA set out the criteria that will be used to develop the DNLUP. The major responsibility of the NPC is to guide and direct resource use and development in the NSA (NLCA 11.4.1 (b)). NLCA 11.2.1 sets out additional principles, policies and objectives for the planning process. The planning process is further guided by NLCA 17.1.3. Some parcels of IOL have had land use designations applied to them that include Protected Areas and Special Management. We believe these decisions best represent the priorities and values of Inuit. Please review the information that was considered in the decision. This information is available in the Options and Recommendations Document.
KIA-02	Kitikmeot Inuit Association	4/11/2014	DNLUP		Land Use Designation	The KIA recommends that terrestrial access or marine access not be restricted to surface IOL in any way by the DNLUP or the final Plan, except with the written consent of the KIA.	The Commission's Broad Planning, Policies, Objectives and Goals direct the content of the land use plan. The NLCA Article 17 guides the Commission decision making. The Plan is intended to reflect the priorities and values of Inuit which in many cases suggests that some IOL parcels do require management under the land use plan. In accordance with the NLCA 17.1.3 IOL are to the extent possible mixed use. Terrestrial and marine shipping is prohibited in specific instances only. Accessory Uses allow winter roads and open water shipping, related seasonal ports and staging, warehousing facilities in all land use designations.
KIA-03	Kitikmeot Inuit Association	4/11/2014	DNLUP		Traditional Place Names	The KIA recommends that traditional Inuit place names to be used for ALL project proposals in the Kitikmeot. We make this recommendation in order for Inuit to better understand the location where projects are proposed.	The Implementation Strategy encourages the inclusion of Inuit place names with the project proposal submission as suggested.
KIA-04	Kitikmeot Inuit Association	4/11/2014	DNLUP			<p>The KIA commends the NPC's Kitikmeot community consultation efforts in March 2014. The NPC staff did an excellent job of documenting Inuit land uses, and knowledge of ecological rhythms and patterns. Once a Plan is in place and development is proposed, the KIA is of the understanding that the NPC will issue a project conformity determination to the proponent that will highlight Inuit land use and concerns in the project area. Likewise, the KIA understands that the NPC will pass on the local Inuit land use and knowledge to the NIRB and NWB for these organizations to consider as part of their further assessment of the project. The KIA is pleased that the NPC determination will communicate this information to both the proponent and other Institutes of Public Government (IPG) because:</p> <p>a. it informs the proponent that their project may be occurring in a multiple use area, and that the proponent may need to undertake mitigative measures if they want the project to proceed;</p> <p>b. it informs the other IPGs to be considerate of the multiple uses occurring in the project vicinity;</p> <p>c. it also informs the IPGs of the local issues and concerns, and allows the IPG to assess the adequacy of the proponents mitigation plan, or to propose alternatives if the plan is insufficient.</p>	General comment noted.
KIA-05	Kitikmeot Inuit Association	4/11/2014	DNLUP		Community Consultation	While the KIA commends the NPC for its March 2014 Kitikmeot community consultations, it must be understood that the NPC's timelines offered the KIA, and especially other Kitikmeot groups (hamlets, HTOs, other organizations, etc.), very little time after these meetings to meaningfully participating in the NULP process and comment on the DNLUP. The KIA understands that it may still make submissions which will be considered by the NPC at its hearing in Iqaluit in November of this year.	General comment noted. The KIA was provided the Draft Plan in September 2012. Public comment is welcome at the public hearing.
KIA-06	Kitikmeot Inuit Association	4/11/2014	DNLUP			During the NPC meetings in Cambridge Bay (September 18 and 19, 2014), the KIA requested clarification from the NPC and Parks Canada (present via teleconference) regarding the status of the proposed extension to the Tuktoyaktuk National Park in Nunavut. The KIA continues to require this clarification.	General comment noted. The extension of the Park has been continued. Please review the information that was considered in the decision. This information is available in the Options and Recommendations Document.
KIA-07	Kitikmeot Inuit Association	4/11/2014	DNLUP			The KIA recommends that proponents of conservation areas provide a comprehensive and modern multi-use geological and ecological resource inventory (e.g. the Rasmussen Lowlands south of Taloyoak, and Kagoryuak River on Kilinik-Victoria Island). Inuit should have the ability to see all the potential uses and benefits of the land, and combine it with the unique Inuit knowledge of the land before making resource management and zoning decisions. In the past, the Queen Maud Gulf Bird Sanctuary, and the Thelon Wildlife Sanctuary were established without consulting Inuit, or without providing Inuit with full information about the resources within those areas. Part of the consultation process is providing the information required in order to make a sound resource management decision. Inuit must understand the opportunity costs associated with the establishment of such areas before decisions are made.	The Plan is not legislation and as such is open for review and amendment. These would be good areas to take priority as part of a regional or sub-regional planning studies. Land use designations have been applied to these areas. These designations would form the basis for the more detailed planning study. Please review the information that was considered in the decision. This information is available in the Options and Recommendations Document.
KIA-08	Kitikmeot Inuit Association	4/11/2014	DNLUP		Conservation Areas	The KIA would also like to learn more about existing conservation areas. The KIA recommends that the Canadian Government complete a modern geological, economic, and ecological resource inventory for the Queen Maud Gulf Migratory Bird Sanctuary and that portion of the Thelon Wildlife Sanctuary within the Kitikmeot Region. Ideally, conservation areas should be located in areas where it provides most benefit to Inuit. These conservation areas were established without this consideration in mind.	General comment noted.
KIA-09	Kitikmeot Inuit Association	4/11/2014	DNLUP		Caribou	Inuit rely on harvesting several wildlife species as part of their cultural and economic needs. Among these wildlife, there is currently a particular interest in Caribou management. Caribou are an important resource to Kitikmeot Inuit. We realize that some of these caribou populations have trans-boundary ranges and wise multiple-use management of the entire herd range will be required to conserve the population throughout their winter and summer range. We respect that many organizations share our concern for healthy wildlife populations. We hope that they will manage their lands and environment within the scope of their authority and jurisdiction. Within its authority and jurisdiction, the KIA will promote the responsible management of wildlife populations within the Kitikmeot Region, and will carefully review development proposals to ensure that the KIA maintains sustainable harvesting opportunities for Kitikmeot Inuit now and in the future.	It is the understanding that the NULP applies to all lands in the NSA including IOL. Land use designations have been developed where appropriate. 80% of the NSA remains open to mining exploration and development. Nearly 6% of the NSA is exclusively for mineral exploration and development and some of this includes IOL. The Plan does contain 15% protected area where mining is prohibited. These include core caribou calving and post calving areas, unique habitat for polar bear, walrus, whales and seals. IOL is also included in these designations which we believe fairly reflects NLCA Article 17.1.3 and feedback that we have received.
KIA-10	Kitikmeot Inuit Association	4/11/2014	DNLUP			Any NULP proposals or restrictions on the use of oceans in the Kitikmeot Region including the Northwest Passage must require the consent of the KIA as it may affect access to IOL or Kitikmeot Inuit harvesting rights.	The Plan does identify areas where shipping is prohibited. However accessory Uses allow winter roads and open water shipping, related seasonal ports and staging, warehousing facilities in all land use designations.

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NT-01	Nunavut Tunngavik Incorporated	3/14/2014	DNLUP			While the DNLUP is well designed to accommodate the information that will form the bulk of the plan, in its present form, the DNLUP is only loosely connected with the NPC's Options and Recommendations document. This tenuous connection creates uncertainty about how the information will be represented in the draft's final form. We would like to better understand how this transition will occur. In this regard, it is unclear how the information collected from the community consultations will be integrated. What weight will be assigned to the data that has been collected? Similarly, the "Land Use Recommendation" areas represent pools of information relevant to land use planning. Both sources of information will be a valuable resource toward developing mitigation measures or guidelines for development and land use and we look forward to learning the final methods that will be employed to further increase the value of the DNLUP.	General comment noted. As per NLCA 11.2.1 outlines principles that guide the development of planning policies, priorities and objectives. The DNLUP has been revised to reflect how the community consultation data is being incorporated into the Land Use Plan. Through the use of Priorities and values it is possible to integrate the feedback collected directly into the design and review of project proposals. The conformity determination process will be automated allowing for ease in identifying the Plan's requirements.
NT-02	Nunavut Tunngavik Incorporated	3/14/2014	DNLUP	Table 1	Land Use Designations	We have identified a number of areas of concern for which we would like to work with your staff to gain clarification. The following Inuit Owned Land subsurface parcels are in one way or another impacted through the NPC's designations: Group 1 (PSE 2): CD-41, CD-46, GF-16 Group 2 (PSE 3): JO-08, JO-09, SQ-05, SQ-01, PI-07 Group 3 (BHC-10): BI-35 Group 4 (BHC-8): CO-54, CO-62, CO-06, CO-08, AR-16, WC-09, SQ-01 Group 5 (BHC-8 and 9): BI-14 Group 6 (Marble Island): RI-03 In addition, a number of surface Inuit Owned Lands parcels are similarly intersected by NPC designation zones and we would like to have the option for consultation to gain clarification on the impacts to these areas as well. A full list is will accompany this letter in email. We anticipate the plan will continue to be refined, evolve and grow as the NPC synthesizes the ever expanding volume of information that they receive from the public and their planning partners. We hope to continue to work together with all parties to ensure that the first instantiation of the plan is a success.	NPC met with NTI on April 10, 2014. NTI was supposed to forward additional information to the NPC. As of June 20, 2014 this information has yet to be received. The land use planning process is intended to be an open public process. If NTI has suggestions or concerns then please provide them in writing for the public record. Future clarification is welcome at the public hearing or through plan amendment post approval.

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MMG-01	MMG	21/03/2014	DNLUP	2.1.2	Caribou Habitat	PSE R2 and PSE R3. It is understood that Project Proposal concerning caribou calving ground and post calving areas will be dealt with through the regulatory process. This calls into play sections 68 and 69 of the Nunavut Planning and Project Assessment Act as it relates to the implementation of the plan. MMG has no issue with this approach. <b>Recommendation:</b> Continue with recommendation approach for caribou habitat.	The Plan has been revised to reflect feedback from residents and government. 80% of the NSA remains open to mining exploration and development. Nearly 6% of the NSA is exclusively for mineral exploration and development. The Plan does contain 15% protected area where mining is prohibited. These include core caribou calving and post calving areas, unique habitat for polar bear, walrus, whales and seals.
MMG-02	MMG	21/03/2014	DNLUP	5.1.1	Mineral Exploration and Production	MMG notes that only its mining interests are captured in the maps, but not its transportation infrastructure requirements (i.e. road and port) corridor interests. The entire proposed project and related interests (e.g., Hood, High Lake East, exploration interests and proposed port location) needs to be added. <b>Recommendation:</b> Add MMG's spatial data summarizing its interests in the Kitikmeot.	The Land Use Designations have been changed. The DNLUP identifies transportation corridors that are for public use and are intended to be long term as opposed to be for temporary private use. For clarity, accessory uses that conform to the Plan include temporary uses such as winter roads, open water shipping and associated ports, staging and warehousing.
MMG-03	MMG	21/03/2014	DNLUP	6	Marine Transportation Routes	The current version of the Plan (2011/2012) does not recognize marine transportation routes including the NW Passage and community resupply routes. These should be recognized as part of the mixed use Chapter 6 and mapped accordingly. Noting the marine transportation route is crucial to bulk carriers, tourism, resupply, etc. Without noting these mixed use activities, all marine vessels transiting the NW Passage would have to receive a conformity ruling. <b>Recommendation:</b> Add the known shipping routes to the land use plan including the NW passage and community resupply routes.	The DNLUP identifies transportation corridors that are for public use and are intended to be long term as opposed to be for temporary private use. The Plan does not determine "where" transportation corridors. Instead the Plan identifies where corridors "cannot" be established.
MMG-04	MMG	21/03/2014	DNLUP	6	Land Transportation	Known and potential land transportation corridors (e.g., BIPR, Tibbett to Contwoyto Winter Road) should be added to the proposed plan. These corridors have been proposed or are already currently in use. <b>Recommendation:</b> Add the known and potential land transportation corridors.	The Land Use Designations have been changed. The DNLUP identifies transportation corridors that are for public use and are intended to be long term as opposed to be for temporary private use.
MMG-05	MMG	21/03/2014	DNLUP	6	Mineral Deposits	MMG notes that the plan does not yet include maps that capture areas of mineral potential. For transparency, these locations should be added to Chapter 6. <b>Recommendation:</b> Add in Chapter 6 those mineral potential areas that meet the requirements of areas of Mixed Use.	AANDC has supplied areas of high mineral potential. These form an area which covers 6% of the NSA with an exclusive mineral use. Mining can occur in 80% of the NSA.
MMG-06	MMG	21/03/2014	DNLUP	7.5 and 7.6	Monitoring Plan Implementation and	The review period should be linked to the findings of 7.5 Monitoring Plan Implementation. There should be consideration for an annual audit and reporting function of the effectiveness of the Plan and Recommendations. This would provide the transparency necessary to determine if and when a Periodic Review is needed. <b>Recommendation:</b> Add an annual audit and reporting function on the effectiveness of the Plan and Recommendations. Add a statement as to who may ask for a review of the Plan.	The Implementation Strategy section regarding Periodic Review and Monitoring has been revised to address the concern.
MMG-07	MMG	21/03/2014	DNLUP	5	Economic Opportunities	MMG would like to ensure that economic opportunities and interests are fully represented in the plan in order to support well informed and balanced decision making. MMG recommends that the next version of the DNLUP expand on the Recommendations for Chapter 5 and Chapter 6 as follows; Recommendations and maps should include areas of high mineral potential and any mining projects in the Kitikmeot (e.g., the Izok Corridor Project is missing); and recommendations and maps should be included for existing and proposed transportation corridors (both land and marine routes).	the information considered in the land use plan is outlined in the DNLUP. Please review the information that was considered in the decision. This information is available in the Options and Recommendations Document. As noted areas of high mineral potential are included in the Plan.

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Sabina-1	Sabina Gold & Silver	14/02/2014	DNLUP	General	General	Sabina Gold and Silver (Sabina) is pleased to submit comments on the Draft Nunavut Land Use Plan. Sabina supports the numerous recommendations put forward by the NWT & Nunavut Chamber of Mines in their February 6th, 2014 submission to the Nunavut Planning Commission (NPC).	General comment noted. Please refer to the NPC response to the NWT/NU Chamber of Mines .
Sabina-2	Sabina Gold & Silver	14/02/2014	DNLUP	5.1	Diversified Economic Development	The current definition of Diversified Economic Development (Section 5.1) is not adequate to address previous, current and future development. This designation should be significantly expanded to reflect all current mineral exploration projects, the exploration history of the territory, and geology and mineral potential of the territory.	General comment noted. 80% of the NSA remains open to mining exploration and development. Nearly 6% of the NSA is exclusively for mineral exploration and development. The Plan does contain 15% protected area where mining is prohibited. These include core caribou calving and post calving areas, unique habitat for polar bear, walrus, whales and seals.
Sabina-3	Sabina Gold & Silver	14/02/2014	DNLUP	General	Access Corridors	Marine and land based access corridors are a requirement for all current and future developments within the territory. It is recommended that the NPC better clarify proposed restrictions, if any, on marine and land based access corridors.	The DNLUP identifies transportation corridors that are for public use and are intended to be long term as opposed to be for temporary private use. The Plan does not determine "where" transportation corridors. Instead the Plan identifies where corridors "cannot" be established. For clarity, accessory uses that conform to the Plan include temporary uses.
Sabina-4	Sabina Gold & Silver	14/02/2014	DNLUP	General	Industrial Infrastructures	The current Draft Plan does not identify all industrial infrastructures in place or proposed. As requested by the NPC, on October 25th, 2012 shape files of Sabina's proposed infrastructure were provided to the NPC. This infrastructure is not identified in the current database.	The Land Use Designations have been changed. The DNLUP identifies transportation corridors that are for public use and are intended to be long term as opposed to be for temporary private use. For clarity, accessory uses that conform to the Plan include temporary uses such as winter roads, open water shipping and associated ports, staging and warehousing.

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Chamber-01	NWT/Nunavut Chamber of Mines	06/02/2014	Working Together	3.1.1.3	National Marine Conservation Areas-Lancaster Sound	Lancaster Sound is a critical marine transportation corridor in support of development in Nunavut. Although it is recognized that shipping can be permitted within a NMCA, the NWT & Nunavut Chamber of Mines ("the Chamber") seeks assurance or clarification that the identification of sensitive marine features in Lancaster Sound would not preclude these critical activities.	The NLUP will not apply in the area once the NMCA has been established. Land Use Designation have been revised to clarify this concern.
Chamber-02	NWT/Nunavut Chamber of Mines	06/02/2014	DNLUP	3.1.2.2	Migratory Birds Sanctuaries	Environment Canada's focus on identifying almost all Key Migratory Bird Habitat Sites as "Highly Risk Intolerant" is extreme. If the DNLUP incorporates these designators, many habitat sites will be given the same standing as the Queen Maud Bird Sanctuary, discouraging exploration and alienating areas where exploration already has occurred without incident in the past.	General comment noted. The Commission's broad planning policies, objectives and goals guide the decision making on the Plans content. Areas with existing rights are considered to conform to the Plan in all land use designations.
Chamber-03	NWT/Nunavut Chamber of Mines	06/02/2014	DNLUP	4.1.1.1	Hiukitak River	The Kitikmeot Inuit Association is developing plans to create a conservation area in and around Hiukitak River south west of Boston. The Chamber supports this initiative.	The Plan has been revised accordingly.
Chamber-04	NWT/Nunavut Chamber of Mines	06/02/2014	DNLUP	4.2.1	Transportation Infrastructure	Transportation Infrastructure is a critical need of industry in developing projects throughout Nunavut at remote locations. The Chamber supports the establishment of transportation corridors in Nunavut to add certainty to move forward plans to construct roads and rail links that will add to the economic feasibility of mining projects in the territory. A number of transportation corridors have already been identified in the DNLUP. However, a transportation corridor in the Kitikmeot has not. The Chamber urges the NPC to consider establishing a transportation corridor in the DNLUP that will allow the orderly and sustainable development of the northern portion of the Slave Geological Province. At least 3 proposed corridor routes are known and deserve the consideration of the NPC: BIPR: MMG Izok Corridor Road route and; the Hope Bay Phase II Road route. The Chamber recommends that the NPC include the transportation corridors currently proposed by various proponents and refer them as "potential transportation corridors" in the plan. Also, the Chamber would like to see other important infrastructure elements identified in the plan, including proposed or potential port sites, ice roads and shipping routes.	The DNLUP identifies transportation corridors that are for public use and are intended to be long term as opposed to be for temporary private use. The Plan does not determine "where" transportation corridors. Instead the Plan identifies where corridors "cannot" be established. For clarity, accessory uses that conform to the Plan include temporary uses such as winter roads, open water shipping and associated ports, staging and warehousing.
Chamber-05	NWT/Nunavut Chamber of Mines	06/02/2014	DNLUP	5.1	Diversified Economic Development	The Plan should not encourage a fear of development. In the cases where ecological values are legitimately sensitive, the Chamber would like the NPC to opt for no permanent protection of conservation areas in favour of 5-year protection. The NPC could revisit every 5 years with the iteration of the Plan to see if wildlife have moved or if community priorities have changed. That way less land is locked up in permanent designations like national parks or national wildlife areas. Another option to consider is to expand the scope of the periodic review process (Section 7.6) to include consideration of land use designations. Adjusting the plan to respond to changes in caribou calving areas over time is a good example of a situation where this type of provision could be applied. However, this type of a provision would need to be guided by clear criteria defining when and how it could be applied to avoid undermining land use certainty. A simple mechanism that takes into account the intended dynamic nature of the DNLUP should be added, so that it is clear that protection is not a one-way street and that land-users have the option to change their minds on the basis of need and new information, including geosciences, and new technologies like hybrid air vehicles that could reduce the need for road access. Text is devoted to the potential for making land use more restrictive for an area but not for steps which can be taken to turn a Category 1 area (Protecting and Sustaining the Environment) into Category 5 (Mixed Use).	The Implementation Strategy section regarding Periodic Review and Monitoring has been revised to address the concern. The Plan identifies priority and values that will need to be considered for mitigation as the project moves on to NIRB / government through the regulatory . These requirements are the results of our community mapping workshops completed .
Chamber-06	NWT/Nunavut Chamber of Mines	06/02/2014	DNLUP	5.1.1	Mineral Exploration and Production	The Chamber encourages the NPC to work closely with government partners to include all areas of known high mineral potential in Nunavut under the "Encouraging Sustainable Economic Development" designation, provided that no other conflicting land use may exist for such lands. Mineral exploration and production is a critical component of the long term sustainability and economic independence of the territory. In addition to industry input, the Government of Nunavut's Mineral Exploration and Mining Strategy "Parnautit" should be considered when revising the DNLUP, as should input from geologists from Aboriginal Affairs and Development Canada, the Canada-Nunavut Geoscience Office, and the Government of Nunavut. New conservation polygons have been developed, but information/layers relating to mineral potential and existing mineral tenures are not currently reflected in the plan. A series of mineral potential maps should be included, similar to the maps that have been produced for commercial fisheries potential. Mineral potential maps for various mineral commodity groups could readily be produced using existing data.	80% of the NSA remains open to mining exploration and development. Nearly 6% of the NSA is exclusively for mineral exploration and development. The Plan does contain 15% protected area where mining is prohibited. These include core caribou calving and post calving areas, unique habitat for polar bear, walrus, whales and seals.
Chamber-07	NWT/Nunavut Chamber of Mines	06/02/2014	DNLUP	6	Mixed Use	To encourage Mixed Use, the Plan should express an intention to incorporate corridors in the future for consolidating various industrial activities i.e. transportation, pipelines, communications, and utilities/power transmission lines.	65% of the NSA has a mixed use designation. Mining activities are able to occur in over 80% of the NSA.

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Peregrine-1	Peregrine Diamonds	14/02/2014	DNLUP	5	Encouraging Sustainable Economic Development	Peregrine Diamonds Ltd.'s ("Peregrine") comments on the Draft Nunavut Land Use Plan ("DNLUP") are detailed in the following paragraphs. Peregrine appreciates the Nunavut Planning Commission's ("NPC") request for comments. The focus of these comments will be on the geological potential of Nunavut, the role the minerals industry must play in developing a sustainable Nunavut economy, and the request to grant Peregrine's exploration projects the Encouraging Sustainable Economic Development ("ESED-1") designation.	Land Use Designations have been revised to provide for more clarity. The ESED goal has been retained but the land use designation has been changed to special management. Areas of high mineral potential have been designated to prohibit the establishment of Parks and Conservation Areas. 80% of the NSA remains open to mining exploration and development.
Peregrine-2	Peregrine Diamonds	14/02/2014	DNLUP	Schedule "A"	Land Use Map - Designations	As it presently exists, the DNLUP land use map in Schedule "A" entitled Nunavut Land Use Plan Lands Use Designations details only a small number of mineral/mining projects as Encouraging Sustainable Economic Development ("ESED"). The source of this information and the criteria for selecting these specific areas are unclear as are the reasons specific sites were selected and others neglected. This ESED designation should be significantly expanded to reflect all current mineral exploration projects, the exploration history of the territory and geology of the territory for which there is abundant documentation.	The land use Designations have been redesigned to clarify the requirements. Note mining activity can occur in any area in the NSA unless specifically prohibited. The Plan does contain 15% protected area where mining is prohibited. These include core caribou calving and post calving areas, unique habitat for polar bear, walrus, whales and seals. All existing rights in place at the time the Plan is approved are considered to confirm to the Plan.
Peregrine-3	Peregrine Diamonds	14/02/2014	DNLUP	Schedule "B"	Land Use Map - Recommendations	On the Schedule B map of the DNLUP entitled Nunavut Land Use Plan Recommendations the ESED designations are larger than on the Schedule "A" map. These areas are larger but still do not adequately reflect the geological potential of the territory in location or scope. As with the Schedule "A" map, the source information and selection criteria are not clear. Certainly, the preponderance of the areas on the map are dominated by the BHC-R2 designation which, in areas that do not have overlapping ESED designations, give the impression that ESED is excluded. Geological data available in the document history can be utilized to delineate all known prospective areas. However, Nunavut's vast territory representing one fifth of Canada's land mass is still underexplored and new discoveries will undoubtedly be made in the future with new exploration initiatives and new technologies. An example of new discoveries can be found on the Hall Peninsula of Baffin Island which was largely deemed as having meager mineral potential until 2008. At this time Peregrine discovered the Chidiak kimberlite field now totaling 67 kimberlites. In 2013 the Canada- Nunavut Geosciences Office based in Iqaluit discovered layered ultramafic rocks in two places on Hall Peninsula. This discovery, along with work done by Peregrine, gives an indication of metals potential. In developing land use plan maps the NPC should seek and review the knowledge available through historic geological documents, and utilize local territorial geological expertise (Canada Nunavut Geoscience Office, AANDC Geology and the Government of Nunavut Minerals Division) to develop a more accurate representation of the mineral potential of the territory. The ESED-1 designation should be expanded to reflect current and historic mineral projects and areas beyond these ESED-1 regions should be clearly illustrated as multi-use in anticipation of possible future mineral discoveries.	Schedule B has been replaced to more clearly represent NWB Water Management Areas and other important information. 80% of the NSA is open to mining and of that 6% is exclusively for mineral exploration and development.

Comment ID	Organization Name	Date of Submission
T-01	TMAC Resources	14/02/2014
T-02	TMAC Resources	14/02/2014
T-03	TMAC Resources	14/02/2014
T-04	TMAC Resources	14/02/2014
T-05	TMAC Resources	14/02/2014
T-06	TMAC Resources	14/02/2014

T-07	TMAC Resources	14/02/2014
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Document Referenced	Section Referenced	Theme of submission or Location /ID# Referenced
DNLUP	3.1.1.3	National Marine Conservation Areas-Lancaster Sound
DNLUP	4.1.1.1	Hiukitak River
DNLUP	4.2.1	Transportation Infrastructure
DNLUP	5.1.1	Mineral Exploration and Production
DNLUP	7.9	Legal Non- Conforming Uses
DNLUP	Table 1: PSE 1, Area 51	(Queen Maud Gulf Islands inside DND)

DNLUP	Table 1, PSE 3, Area 46A	Lambert Channel
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## Comment

Previous shipments of Hope Bay material and supplies have been made through this area, and this route will be used by our project again.

Although it is recognized that shipping can be permitted within a NMCA, we would seek assurance or clarification that the identification of sensitive marine features in Lancaster Sound would not preclude these critical activities.

TMAC acknowledges that the Kitikmeot Inuit Association is developing plans to create a conservation area in and around Hiukitak River south west of the Boston deposit, and that Inuit Owned Land parcels in this watershed have been withdrawn from surface access by the KIA. TMAC supports this initiative.

A number of transportation corridors have already been identified in the DNLUP. However, a transportation corridor in the Kitikmeot, and specifically at Hope Bay, has not.

We urge the NPC to consider the establishment of a transportation corridor in the DNLUP for the Hope Bay Project approximating the Hope Bay Phase II Road Route.

This would provide the certainty required to allow for the transportation infrastructure necessary to develop the entire Hope Bay Belt. We believe this would help achieve the NPC's objectives stated in Section 4.2 of the DNLUP.

We note that the Inuit Owned Land parcels at Hope Bay have been designated in the DNLUP for Economic Development. However, the Crown land portions of the Hope Bay project have been designated for Mixed-Use. It appears to us that zoning for our project is based on land tenure. Inuit Lands are to be developed for the economy while Crown lands may be. We are not aware of any significant ecosystem, geographic or land value differences between Inuit Owned and Crown Lands at Hope Bay. It is probable that future development will straddle two land use designations, while the mineral potential is similar for the entire greenstone belt. We are concerned about the future Land Use conformity consequences of this situation. Future planners and decision makers may well be confused when faced with this arbitrary distinction, leading to uncertainty. In principle, we believe that the long recognized economic development potential for Hope Bay should have land use priority where no other competing land use or value has been identified. We respectfully request that the land use designations for our project area be reviewed with the aim of designating the entire Hope Bay greenstone belt (Inuit Owned and Crown) for Economic Development use.

The plan currently indicates that, "Any use of land which does not conform to the Plan but which lawfully existed prior to the approval of the Plan is a legal nonconforming use. When a legal non-conforming use ceases, the legal rights will terminate." As the meaning of this phrase could be ambiguous, we suggest clarifying that a legal non-conforming use will deem to be continued as long as any requirements or approvals remain in force, and that renewal of such permits or approvals would also be deemed as a continued use.

As indicated in Section 1 above, the Hope Bay project relies on marine transportation links to eastern Canada that may utilize this section of Kitikmeot coastline. We seek clarification if such a future designation would impact marine shipping through the eastern approaches to the Northwest Passage.

As previously indicated in Section 1 above, the Hope Bay project relies on marine transportation links to western Canada that will utilize this section of Kitikmeot coastline. We seek clarification on how such a designation would impact marine shipping essential to the development of the mineral resources of the Kitikmeot region.

## NPC Response

The NLUP will not apply in the area once the NMCA has been established. Land Use Designation have been revised to clarify this concern.

General comment noted. The Plan has been revised accordingly.

The DNLUP identifies transportation corridors that are for public use and are intended to be long term as opposed to be for temporary private use. The DNLUP identifies transportation corridors that are for public use and are intended to be long term as opposed to be for temporary private use. The Plan does not determine "where" transportation corridors. Instead the Plan identifies where corridors "cannot" be established. For clarity, accessory uses that conform to the Plan include temporary uses such as winter roads, open water shipping and associated ports, staging and warehousing.

The DNLUP has been revised to address this concern. The Plan now sets aside nearly 6% of the NSA exclusively for mining activity. The areas designated were identified by AANDC. Project proposal can "straddle" land use designations as long as the use is not prohibited. The Hope Bay property was included with the economic potential map provided by AANDC.

The Implementation Strategy sets out more details on the requirements of NUPPAA under the heading Existing Rights.

Comment has been addressed above.

Comment has been addressed above.

Comment ID	Organization Name	Date of Submission	Document Referenced	Section Referenced	Theme of submission or Location /ID# Referenced	Comment	NPC Response
NWMB-01	Nunavut Wildlife Management Board (NWMB)	5/22/2014	DNLUP	2.1.2	Caribou	<p>The NWMB does not think that this recommendation fully recognizes the economic, social and cultural importance of caribou to Inuit; nor does it fully acknowledge the sensitivity of caribou to disturbance and habitat alteration during the calving and post-calving period.</p> <p>In the NWMB's opinion, disturbance during the calving period and destruction of this important habitat should be prohibited. Furthermore, the NWMB is also concerned about the cumulative effects of development in caribou calving and post-calving grounds and how this may affect productivity and herd size.</p>	The caribou section of the land use plan has been revised. Protected Areas and Special Management are used to protect the areas where there are no existing rights. Existing rights are protected under NUPPAA. Areas with existing rights or high mineral potential are designated Special Management. The DNLUP has been revised to address calving and post-calving areas. Changes were made to some of the recommendations to reduce fragmentation of calving and post-calving areas when possible.
NWMB-02	Nunavut Wildlife Management Board (NWMB)	5/22/2014	DNLUP	2.1.2	Caribou	The NWMB recommends that the NPC reevaluate their classification for caribou calving and post-calving grounds, and that the NPC assign these areas a Protecting and Sustaining the Environment Land Use Designation which prohibits all mining exploration and development.	The DNLUP has been revised to address calving and post-calving areas.
NWMB-03	Nunavut Wildlife Management Board (NWMB)	5/22/2014	DNLUP	2.1.2	Caribou	The NWMB urges the NPC to use the maps outlining the caribou calving and post-calving core ranges (provided by the Government of Nunavut Department of Environment) when identifying caribou calving and post-calving grounds in the Draft Plan.	Comment addressed above.

Comment ID	Organization Name	Date of Submission	Document Referenced	Section Referenced	Theme of submission or Location /ID# Referenced	Comment	NPC Response
KWB-01	Kivalliq Wildlife Board (KWB)	1/22/2014	DNLUP	2.1.2	Caribou	The KWB has been presented information from other RWOs, and the Department of Environment that caribous subpopulations are decreasing. With exploration and development underway in the Kivalliq region, the Kivalliq Wildlife Board is also concerned about caribou populations, calving and post calving habitat. It is evident that disturbance in caribou range and habitat have an impact on the caribou.	The caribou section of the land use plan has been revised. Protected Areas and Special Management are use to protect the areas where there are no existing rights. Existing rights are protected under NUPPAA. Areas with existing rights or high mineral potential are designated Special Management. he DNLUP has been revised to address calving and post-calving areas. Change were made to some of the recommendations to reduce fragmentation of calving and post calving areas when possible.
KWB-02	Kivalliq Wildlife Board (KWB)	1/22/2014	DNLUP	2.1.2	Caribou	The Kw urges the NPC to include protection of caribou range and habitat in the upcoming Nunavut Land Use Plan.	Comment addressed above. 15% of the NSA is designated protected area where mining is prohibited.
KWB-03	Kivalliq Wildlife Board (KWB)	1/22/2014	DNLUP	2.1.2	General	The KWB and Kivalliq HTOs would also like to be included in reviewing the Final Land Use Plan to ensure protection of wildlife.	General comment noted. We encourage representatives to attend in the Commission's public hearing scheduled for November 2014.

Comment ID	Organization Name	Date of Submission	Document Referenced	Section Referenced	Theme of submission or Location /ID# Referenced
NWB-1	Nunavut Water Board	14/02/2014	Working Together		Mandate/Responsibilities
NWB-10	Nunavut Water Board	14/02/2014	Options and Recommendations		Mineral Exploration and Production
NWB-11	Nunavut Water Board	14/02/2014	Working Together		Periodic Review
NWB-12	Nunavut Water Board	14/02/2014	Options and Recommendations/DNLUP		Permitted and Prohibited Uses

Comment ID	Organization Name	Date of Submission	Document Referenced	Section Referenced	Theme of submission or Location /ID# Referenced
NWB-13	Nunavut Water Board	14/02/2014	DNLUP/Options and Recommendations	General	Water Management Areas and the Strategy for Water Management

Comment ID	Organization Name	Date of Submission	Document Referenced	Section Referenced	Theme of submission or Location /ID# Referenced
NWB-14	Nunavut Water Board	14/02/2014	DNLUP/Options and Recommendations	Definitions	Value of Water
NWB-15	Nunavut Water Board	14/02/2014	Options and Recommendations		Cumulative Impacts

Comment ID	Organization Name	Date of Submission	Document Referenced	Section Referenced	Theme of submission or Location /ID# Referenced
NWB-16	Nunavut Water Board	14/02/2014			Process
NWB-2	Nunavut Water Board	14/02/2014	Guide to Engagement		Process
NWB-3	Nunavut Water Board	14/02/2014	Guide to Engagement		Process
NWB-4	Nunavut Water Board	14/02/2014	Guide to Engagement		Process
NWB-5	Nunavut Water Board	14/02/2014	Options and Recommendations		Layout

Comment ID	Organization Name	Date of Submission	Document Referenced	Section Referenced	Theme of submission or Location /ID# Referenced
NWB-6	Nunavut Water Board	14/02/2014	Options and Recommendations		Layout
NWB-7	Nunavut Water Board	14/02/2014	Options and Recommendations		Heritage Rivers
NWB-7	Nunavut Water Board	14/02/2014	Options and Recommendations		Areas of Community Interest
NWB-8	Nunavut Water Board	14/02/2014	Options and Recommendations		Community Drinking Supplies

Comment ID	Organization Name	Date of Submission	Document Referenced	Section Referenced	Theme of submission or Location /ID# Referenced
NWB-9	Nunavut Water Board	14/02/2014	Options and Recommendations		Land Remediation
	Nunavut Water Board	14/02/2014	Options and Recommendations		Process

## Comment

The Nunavut Water Board (NWB or Board) is an Institution of Public Government (IPG) created under Article 13 of the *Nunavut Land Claims Agreement (NLCA)*. The NWB is responsible for the use, management, and regulation of inland waters or freshwaters in the territory of Nunavut. The Board is required, in carrying out its responsibilities, to consider any detrimental effects that potential use of waters or deposit of wastes could have on other water users and the freshwater receiving environment. This requirement corresponds with a key objective of the NWB's mandate to provide for the conservation and utilization of waters in Nunavut - except in national parks - in a manner that will provide optimum benefits for the residents of Nunavut in particular and all Canadians in general.

The Options document does not address how the DNLUP will be implemented with respect to existing water users and licence holders. For instance, the NWB is seeking clarification on how the designation for Mineral Exploration and Production applies to projects that are at early exploration stage, but will eventually progress to advanced exploration and/or mining stages. If there are existing provisions (e.g. grandfathering provisions) that are intended to apply to existing users, then specific timelines should be detailed as part of the Options document and/or DNLUP. Details regarding how the designation will treat any other activities associated with, but not currently listed under the Commission's recommended option for Mineral Exploration and Production (Option 3), should also be provided.

The NWB is interested to receive further details pertaining to the manner through which its own evolving needs will be incorporated into the NLUP in the near and distant future. In particular, further details pertinent to the periodic review of the NLUP should be provided to all planning partners and interested parties, including the anticipated timelines for a 'standard amendment', information requirements, and a process overview. There should also be a discussion in the Options document or DNLUP that details the feedback loops that will be incorporated to inform the periodic review sessions (e.g. *monitoring programs, types of data being collected, the stakeholders who will be involved in such review periods, etc.*).

The NWB is concerned that the term 'Permitted Uses' may be misconstrued as meaning '*activities that require permits*'. It would be preferable to use terms such as 'allowable' or 'permissible' to avoid any confusion. If the Commission is unwilling to modify its use of this term, the NWB recommends that text be added to the definition that provides clarification, such as "*Permitted Uses do not necessarily refer to the requirement for a government authorized permit*".

## Comment

The NWB has emphasized the importance of including the boundaries of the 65 Water Management Areas (WMAs) in the DNLUP to the Commission from almost the inception of the Commission's process (e.g. *submissions to the Commission, one-on-one meetings, workshops, etc.*). To the NWB's understanding, the Commission had actually gone as far as to include the WMAs in a previous iteration of the DNLUP, but then subsequently removed them without explanation. Nonetheless, at the Commission's most recent workshop (September 17-19, 2013), the Commission stated that the WMAs would be included in the next iteration of the DNLUP<sup>1</sup>. The usage of water-related terminology by Commission staff also increased as the workshop progressed, such as the acknowledgement that land-use planning in Nunavut should strive to develop plans at the 'watershed scale' as the territory moves forward. These are encouraging developments that are highly supported by the NWB. While the Commission has already agreed that the WMAs should be included in a revised version of the DNLUP, the Commission has also requested that the NWB document the rationale for this recommendation by providing further details in the NWB's submission to the Commission. In response to the Commission's request, the NWB is confirming that it strongly supports the inclusion of the boundaries of the 65 WMAs defined in the Nunavut Waters Regulations (the Regulations) (SOR 2013/669 18th April, 2013) in the DNLUP. There are many reasons why it is important to include the 65 WMAs as a fundamental feature of the NLUP, including the following:

### Watershed Planning

Deciding which activities and ecosystem components should be considered in land use planning decision-making can be challenging (e.g. should activity 'x' at distance 'y' from land feature 'z' be considered?). Moving towards watershed planning could directly assist the Commission in such decision-making processes by providing a spatial metric through which a comprehensive assessment of land uses in each respective WMA can be conducted, which may further support the Commission's determination of cumulative effects. For instance, consider how land use planning goals under the DNLUP relate to the mining activity occurring in WMA 5 (Lower Thelon Watershed), represented on the territory-wide maps provided in Appendix A (Maps 1-4). Were the Commission to approach land use planning at the watershed scale in WMA 5, a wide range of interrelated issues could be addressed at a level that is manageable both in terms of conceptualizing problems and addressing them with planning partners. Consider how the DNLUP's goals for the thematic area 'Encouraging Conservation Planning' are affected by not providing consideration to the impacts of other activities occurring within the watershed. In this particular example, the DNLUP's goal of protecting the Thelon River<sup>2</sup> cannot be adequately met if impacts from activities occurring

within the watershed are not accounted for in the design of conservation plans and/or the authorization of further activities (e.g. the effects of mining activities on the Thelon River may go unaccounted for when a watershed planning approach is not used, as the analysis for decision-making may be occurring on a different spatial scale). This approach has already been applied on the Soper River (another Heritage River), wherein the management plan applies to the entire watershed of the river.

### Water Management Strategy

The WMAs are part of the central mechanism through which the NWB and its partners will seek to incorporate the strategy that will be developed for water management across Nunavut. Should these boundaries not be incorporated at this time, there is the possibility that the final land use plan would need to be amended multiple times in order to incorporate policies that will be developed for each respective WMA.

In all cases where it is unclear to the Commission on how to approach a given water management issue, the NLUP should refer the interested party or applicant to the Strategy as part of their conformity determination with the Commission, wherein a project's proponent is required to confirm that it (a.) meets the requirements of the Strategy or (b.) has received authorization from the NWB to proceed through the regulatory process. Ultimately, the DNLUP should include language and conditions that are sufficiently flexible to allow for an immediate or subsequent integration of the Strategy's policies and associated water

## Comment

While the DNLUP implicitly considers water through its definition for *land 4*, it is important that the DNLUP explicitly recognizes the role and value of water given that impacts to water resources may affect all other ecosystem components covered in the DNLUP. In particular, the NWB looks forward to seeing the inclusion of a discussion in the next iteration of the DNLUP that gives attention to themes such as ecosystems' fundamental need for water to sustain integrity and the valuation of water as an economic and therefore social resource. The DNLUP should ultimately recognize that water is a fundamental consideration in land use planning and refer its audience to the NWB's strategy for water management for consideration of specific water management concerns (i.e. *the strategy that is currently being formulated by the NWB and its partners*).

In the Options document, the Commission presented the following two options for managing cumulative impacts in Nunavut: Option 2: Implement agreed upon thresholds for land use activities.

As there are no agreed upon thresholds at this time, the Commission has proceeded to recommend Option 1. While the DNLUP currently states that it is the Commission's Policy to "consider implementing thresholds for cumulative impacts, or levels of acceptable change...", there are no details regarding the process forward through which such thresholds would be developed. The NWB recommends that the Commission (a.) includes the NWB in the development of the directive for referring project proposals with potential cumulative impacts for review and (b.) develops a general work plan or 'path forward' with its Planning Partners that would facilitate the development of thresholds.

Furthermore, as noted above, the WMA boundaries can assist the Commission in conducting its cumulative effects assessment by providing a spatial unit of analysis that would not exist otherwise. The overloading of a watershed with projects and their associated cumulative impact on the ecosystem would not be accurately captured under the current iteration of the DNLUP. As such, the NWB recommends that the Commission includes the WMA boundaries and actively uses them to assist the Commission in the analyses it conducts. The NWB may also be uniquely positioned to provide some of the relevant data (e.g. data that supports an environmental baseline for certain regions) in this regard as its new technological systems are implemented and pertinent data feedback loops are initiated.

## Comment

The extensive data-gathering undertaking the Commission is currently conducting and the resulting information will significantly benefit both Nunavummiut and the Commission's Planning Partners. The NWB recognizes that the Commission's tour of Nunavut's 26 communities is in progress and that 'the ship is sailing' in regards to input for the DNLUP. Nonetheless, as a note for future community meetings, the NWB feels strongly that the current community meetings would have benefited from a more directed approach that made use of guidance from the NWB prior to visiting the communities, such as guidance for the types of probing questions that draw upon Inuit Qaujimajatuqangit (IQ) and other elements of concern in order to provide guidance to the NWB in areas that are meaningful to it (e.g. information that is useful for the purposes of water management). In regards to analyzing the resulting data, it is the NWB's understanding that there has been no weighting of the public input (e.g. 1 community member idanalysis that would not exist otherwise. The overloading of a watershed with projects and their associated cumulative impact on the ecosystem would not be accurately captured under the current iteration of the DNLUP. As such, the NWB recommends that the Commission includes the WMA boundaries and actively uses them to assist the Commission in the analyses it conducts. The NWB may also be uniquely positioned to provide some of the relevant data (e.g. data that supports an environmental baseline for certain regions) in this regard as its new technological systems are implemented and pertine

An initial issue is that the document is non-binding, which reduces the degree of certainty associated with the process. While the NWB recognizes that a binding guide might provide less flexibility on the part of the Commission, such a guide would provide planning partners and stakeholders with the clarity that is needed to properly plan for their respective contributions to the DNLUP.

Another issue is that the nature of the submissions required at different stages is not very clear. A more comprehensive description of the types of information and format the Commission is seeking in the Guide, and the significance of each respective submission in terms of the overall DNLUP process would serve as improvements to the Guide. Additionally, the Guide is also not clear as to what opportunities exist for the NWB to participate in the Commission's consultative process

The Commission has requested in the Guide that comments be received from all parties (February 14, 2014) prior to the anticipated date for completion of the Commission's community consultations (March 2014). This consequently does not provide parties with the opportunity to review the draft community reports that are based on the results of those consultations, which are scheduled to be released *after* parties have had the opportunity to provide comments on the DNLUP (May 2014). Furthermore, it was evident at the Commission's most recent workshop entitled "*Filling Gaps in the DNLUP*" held on September 17-19, 2013 (Workshop) that the approach of having parties comment on the 'Options and Recommendations' document rather than a revised DNLUP is confusing for some concerned parties. If the Commission is not willing to adjust the DNLUP review timeline to allow for the preparation and review of a revised DNLUP, then every effort should be made to provide parties with all relevant materials (e.g. *data, reports, plans* in a revised version of the DNLUP, the Commission has also requested that the NWB document the rationale for this recommendation by providing further details in the NWB's submission to the Commission. In response to

A 'Table of Maps' should be added to the front-end of the document to assist users in navigating the substantial number of maps provided at the end of the document; and

## Comment

Consideration should be given to modifying the layout of the document so as to make it easier for reviewers to navigate. The current layout requires reviewers to scroll back and forth or view the document at about 75 percent its actual size to access the contents of each page.

The NWB's concern for the Commission's approach to land use planning for heritage rivers is that the Commission's recommended options may limit the NWB's ability to exercise its authority and mandated-role in water management and licensing on or proximal to Canadian Heritage Rivers. None of the Commission's recommended options appear to account for impacts that may occur to the Thelon, Kazan, or Soper River's tributaries, all of which may be affected by the licenses the NWB issues. Accordingly, the NWB is seeking details regarding the inclusion of provisions for each respective recommended option that will allow the NWB to issue licenses for undertakings that are proximal to the buffer zones or in watersheds affecting Heritage Rivers. Given the NWB's expertise, role, and high level of interest in the area of water management, the NWB recommends that the Commission provides a fourth option, wherein a designation is assigned that permits tourism, recreation, and research, while additionally requiring all projecin a revised version of the DNLUP, the Commission has also requested that the NWB document the rationale for this recommendation by providing further

The Hiukitak River has been identified by the Kitikmeot Inuit Association (KIA) as a special area of interest to the people of Bathurst Inlet and Umingmaktok. The NWB is concerned that the process that led to the decision to select Option 1, is not sufficiently described or transparent in the Options document. Based on the information provided, it appears there were opposing interests between the KIA's Board Directive to close Inuit Owned Lands (IOL) parcels in the area to mineral exploration (2006) and Nunavut Tunngavik Inc.'s (NTI) insistence that there be no restrictions on development activity on IOL. This particular area also contains historic caribou calving grounds and portion of the area is contained within the Queen Maud Sanctuary. This area was assigned a designation that permits all uses in order to be consistent with the direction provided by NTI. Given the comments from KIA and the value placed on wildlife sanctuaries elsewhere in the Options document (e.g. Thelon Wildlife Sanctuary),analysis that would not exist otherwise. The overloading of a watershed with projects and their associated cumulative impact on the ecosystem would not be accurately captured under the current iteration of the DNLUP. As such, the NWB recommends that the Commission includes the WMA boundaries and actively uses them to assist the Commission in the analyses it conducts. The NWB may also be uniquely positioned to provide some of the relevant data (e.g. data that

The Options document includes land use designations and considerations for how project proponents should proceed when their activities occur within a watershed that encompasses a community's water supply (referred to here as 'source protection'). Overall, out of 26 source protection options considered by the Commission, 19 communities received designations that permit all uses (Option 1), wherein it is recommended to regulators and project proponents to consider their impacts on the area. At this time, the NWB does not hold sufficient data or information to provide the Commission with specific management actions that should be implemented in each respective community's source protection area as part of the DNLUP. Until the NWB has had the opportunity to research the issue more thoroughly and develop an approach that is considered appropriate by all concerned parties, the NWB is limited in its capacity to advise the Commission. More comprehensive guidance and direction on the issue of source protection may be in a revised version of the DNLUP, the Commission has also r

## Comment

The Options document recommends Option 3 for the Department of National Defence (DND) controlled Distant Early Warning line sites (DEW) and Option 1 for Aboriginal Affairs and Northern Development Canada (AANDC) remediation sites. Based on the authorizations issued by DND to respective project proponents, the NWB has issued, in the past, a small number of licenses for exploration and research undertakings and activities that depended on airstrips and camp infrastructure associated with DND DEW lines sites. Therefore, in the context of Option 3, the NWB seeks clarifications from the Commission with respect to if and how Option 3 will impact the NWB's ability to issue similar licenses in the future. The same type of clarifications is requested for the Northern Warning System as well.

In regards to analyzing the resulting data, it is the NWB's understanding that there has been no weighting of the public input (e.g. *1 community member identifies issue X as a concern, 9 community members identify issue Y as a concern*). While the NWB anticipates that the Commission will adequately assess the results of the community tour prior to finalizing the NLUP, it is not clear if the resulting analyses will be made available to the Commission's Planning Partners and stakeholders, where it is considered relevant. As such, the NWB recommends that the following be provided to all concerned parties: (a) raw data from community tours, (b) the results of all relevant final analyses, and (c) descriptions of the corresponding methodologies.

NPC Response	Notes	Status
<p>The plan has been updated to more fully describe the integrated nature of the regularity process in Nunavut.</p>		<p>Revise Working Together Document</p>
<p>Existing rights are detailed in NUPPAA. The Implementation Strategy has been revised to include the NUPPAA requirements.</p>		<p>Revise ORD</p>
<p>The Plan has been revised to provide a framework for integration of land use planning and water management. The NWB Water Policy will be a useful tool to support future land use planning decisions and the Water Management Areas are now integrated.</p>		<p>Revise the Plan and Procedures</p>
<p>NUPPAA uses the term "permitted" use. However we try to use language such as considered to conform to the plan to minimize risk of confusing proponents and others.</p>	<p>Clarify that the permitted uses are just for the Plan. Enhance the definition of Permitted Use to avoid confusion with other regulatory processes.</p>	<p>Revise the plan, ORD and finalize the response</p>

NPC Response	Notes	Status
<p>Water Management Areas have been included in the DNLUP as well as a discussion on the importance of Watershed Planning.</p>		<p>Revise the plan, ORD and finalize the response</p>

NPC Response	Notes	Status
<p>Water Management Areas have been included in the DNLUP as well as a discussion on the importance of Watershed Planning.</p>		<p>Revise the plan, ORD and finalize the response</p>
<p>The DNLUP has been revised to address calving and post-calving areas. At this time the NPC is not coordinating the development of thresholds. The Commission's broad planning policies, objectives and goals require the NPC to implement thresholds and indicators developed by government and other IPGs. The Plan has been revised to identify in which specific situations the NPC may refer a project for cumulative impact concerns.</p>		<p>No action required</p>

NPC Response	Notes	Status
<p>The NPC believes that it has compiled useful information for land use. Perhaps when the Water Policy Strategy is finalized the NWB will be able to provide more comprehensive feedback. All data has been made public. The raw data from the communities is on the NPC website as NWB was previously advised. Comments regarding community feedback have been addressed above. .</p>	<p>Continue to post raw data online.</p>	<p>Revise the plan, ORD and finalize the response</p>
<p>The engagement strategy is a guide not a contract. It is intended to be flexible and adaptive to address unknown matters.</p>		<p>No action required</p>
<p>General comment noted.</p>		<p>No action required</p>
<p>General comment noted.</p>		<p>No action required</p>
<p>The NPC has revised the document to provide a Table of Maps and Illustrations.</p>		<p>Revise ORD</p>

NPC Response	Notes	Status
<p>General comment noted and NPC has taken this into consideration during the revisions of the DNLUP. Once the plan implementation is automated it will simplify the use of the plan. In interim the NPC has done its best to simplify the document.</p>		Revise ORD
<p>NPC has directed users to implement management plans. Revisions to the Plan have been incorporated to ensure that the whole water system is looked at when managing the Land Use Plan.</p>	<p>Make sure NPC doesn't minimize the NWB mandate.</p>	Revise ORD
<p>The Hiukitak River has been given a Protected Area Designation..</p>		No action required
<p>The land use designations have been revised. The NWB along with relevant regulatory authorities will be triggered to review project proposals within your authority to do so., NUPPAA requires the proponent to self identify all authorizations associated with the project proposal. The Plan has been revised to give presence to water and to being incorporating the Water Management Areas into our regular business.</p>		

NPC Response	Notes	Status
<p>Accessory Uses are considered to conform in all land use designations. This allows temporary and seasonal uses to be considered. This approach will streamline conformity determinations and address the suggestion.</p>	<p>Information that can be included in NPC thought process when determining designations.</p>	<p>Revise the plan, ORD and finalize the response</p>
<p>No weighting of the community tour information is required. All the data compiled is included in the conformity determination. Priorities and values of residents require mitigation where appropriate in all land use designations. The raw data from the community is available on the website. At present the priorities and values are listed by Water Management Area for territorial and by community for marine areas. These will be automated features used to implement the land use plan and will make ease of reference relevant information user friendly.</p>		<p>No action required</p>

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NIRB-1	Nunavut Impact Review Board (NIRB)	14/02/2014	Working Together		Clarification of NPC's role	The comments pertaining to the Working Together Document relate to clarification of NPC's role in the NSA and the role of each partner involved in the implementation of the NLUP. The NPC has identified itself as the authority responsible for reviewing all projects within the NSA within the Working Together document, though it remains unclear from our review whether the jurisdiction of the NLUP and the NPC's consideration of projects would extend into National Parks, historic places, or within established municipal boundaries. The document references "partners in the implementation" of the NLUP, however the roles that each partner would play in that implementation were not clear to our reviewers. It does not appear that the document describes how these partners would be involved in the monitoring of projects, or what, if any, their responsibility for reporting on the effectiveness of the NLUP would be and what the process for reporting would be. It is suggested that NPC provide further clarification on what it expects the role of each partner as identified in the Working Together Document would be, and how they would be involved with the implementation of the NLUP, including a discussion of the potential monitoring roles and responsibilities of agencies as applicable.	The Plan has been revised to clarify its application. The Implementation strategy has also been revised to more fully include the requirements of NUPPAA. The Implementation Strategy includes more details on the periodic review and monitoring of the plan.
NIRB-2	Nunavut Impact Review Board (NIRB)	14/02/2014	DNLUP & Options and Recommendations	Definitions	Definitions	While a list of definitions was provided within the DNLUP, some of the terms as defined may be inconsistent with the working definitions of other agencies (e.g. Inuit Qaujimajatuqangit). Some terms used throughout the DNLUP and Options and Recommendations document were not included within the list of definitions. It is recommended that these be included, especially where working definitions may vary between organizations or may be open to interpretation. The NIRB recommends that the NPC include definitions for terms used within the NLUP and in supporting documents, and that it consider updating the definitions provided to reflect those definitions as may be currently utilized by other agencies. A table of definitions within the Options and Recommendations document would be a helpful reference tool and resource for readers.	Definitions have been updated.
NIRB-3	Nunavut Impact Review Board (NIRB)	14/02/2014	DNLUP		Data gaps	The NPC has identified data gaps within the DNLUP, however it does not appear that any indication was provided regarding plans to address these gaps, nor any discussion of the application of the NLUP in the absence of known gaps. It is recommended that the NPC include a discussion on how data gaps will be treated by the NLUP and how the NPC and the NLUP may be prepared to compensate for known data gaps. Additionally, it is recommended that the NPC discuss its plans to obtain the information necessary to address these gaps as well as a timeline for these plans and any updates to the NLUP which may be required as a result.	The NPC has revised the Plan to include priority research areas that would support the future development of the Plan.
NIRB-4	Nunavut Impact Review Board (NIRB)	14/02/2014	DNLUP	1.3.4	Application of the DNLUP within Municipality Boundaries	As noted above, the applicability of the DNLUP within established municipal boundaries is not clear and it is recommended that this be further defined and described. Where section 1.3.4 of the DNLUP discusses application of the plan, it is recommended that this section include clarification regarding projects proposed within municipal boundaries, as it does not appear that the DNLUP discusses the management of developments within municipal boundaries. While community maps are provided as Appendix A to the DNLUP, it is not clear whether or how these maps were intended to assist with the consideration of potential land use activities within municipal boundaries, or in determining whether such developments conform with the DNLUP. It is recommended that the NPC provide further clarification regarding conformity requirements, if any, of proposals within municipal boundaries and also to discuss the intended use of community maps as presented in Appendix A. Including discussion of the overall applicability of the DNLUP within municipal boundaries would be a helpful addition to the Options and Recommendations document as well.	The definition of Project Proposal explains and more explanation has been provided in the Introduction section of the Plan. The Plan has also been revised to apply a Mixed Use Designation to allow land use within the municipal boundaries to be managed by the municipal plan where ever appropriate.
NIRB-5	Nunavut Impact Review Board (NIRB)	14/02/2014	DNLUP	Chapter 4	Community watersheds	It was noted that the Options and Recommendations document sets out a designation to permit all uses for land use within community watersheds. This option designation would also appear to apply to communities that have not considered development within their own watershed(s). It is recommended that the NPC consider providing a recommendation as part of the Options and Recommendations document or the DNLUP which applies to municipalities that have not accounted for development within their watershed(s) and to discuss whether the NPC may consider recommending that this be included within applicable municipal plans.	The municipal governments are responsible for preparing their own community plans. The NPC works closely with the GN and communities during the development of community plans and will be able to make those suggestions directly during development of the community plan.
NIRB-6	Nunavut Impact Review Board (NIRB)	14/02/2014	DNLUP	4.4.4	Aerodromes	The option designation to permit all uses was assigned to manage land uses for aerodromes within municipalities. It is unclear whether the DNLUP would apply to these lands in cases where aerodromes fall under federal jurisdiction and as such, the NIRB requests that the NPC clarify the selection of this option.	The revised DNLUP and ORD does not designate Aerodromes. Regulations are in place for all Nunavut airports and the land use plan does not need to duplicate restrictions.
NIRB-7	Nunavut Impact Review Board (NIRB)	14/02/2014	DNLUP		Areas of Equal Use and Occupancy	The DNLUP and Options and Recommendations documents do not appear to describe how Areas of Equal Use and Occupancy of the Inuit of Nunavut and Nunavik have been included within the land use planning process. In addition, the DNLUP does not appear to describe how areas where other Aboriginal groups (Athabasca Denesuline and the Manitoba Denesuline) with title claims that overlap with the NSA would be managed by the NLUP. No discussion was provided on whether or not these Aboriginal groups with title claims were consulted and it remains unclear whether these parties have been otherwise involved in the land use planning process. Furthermore, no discussion is provided regarding how these lands would be managed and accounted for within the NLUP nor whether any designations would be applied. It is suggested that the DNLUP and Options and Recommendations documents be updated to include relevant sections which provide further detail on how these areas would be managed, and which outline the NPC's planned approach to revisit these areas should the status of these lands change.	The Plan has been revised. Priorities and values are being implemented through the conformity determination process. As well land selected as part of the overlap negotiations have been protected under the Plan.
NIRB-8	Nunavut Impact Review Board (NIRB)	14/02/2014	DNLUP	Table 1	Land use designations	The DNLUP identifies certain areas with the "permitted use" status while identifying a "prohibited use" status for sites which already have "permitted use" status assigned. These land use designations are ambiguous, for instance, where a PSE-2 permitted use includes "tourism, research and recreation" but does not identify any specifically "prohibited use". Identifying such uses which may not be permitted would be helpful in further delineating restrictions or limitations to development activity in specific areas. While the DNLUP is helpful in identifying specific areas of importance in the NSA to be protected, it appears to lack clear guidance in establishing methods to protect areas that identify "permitted use" status by restricting activities. The DNLUP and Options and Recommendations document should clearly define what would be allowed in areas with a "permitted use" status when no specifically "prohibited use" is identified for the area. As noted, it would also be useful to provide an explanation of the types of land use that would be restricted where a "permitted use" was identified, a rationale provided on why no "prohibited use" was identified, and to possibly include a third option of potential other uses that could be permitted with a plan amendment.	The NPC has amended the Land Use Designations to clarify permitted and prohibited uses.

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NIRB-9	Nunavut Impact Review Board (NIRB)	14/02/2014	Options and Recommendations	Chapter 3	Hiukitak River - Selection of Options	The selection of options as described within the Options and Recommendation document is unclear as these relate to considerations of climate change and the Hiukitak River. The DNLU states the NPC's objectives relating to climate change and outlines that in achieving its objective, the NPC's policy is to where appropriate, provide direction to the NIRB, regulators and Inuit land managers to manage climate change issues, including Greenhouse gas emissions. The NIRB also notes that the Commission considers climate change to be an important factor for all Project Proposals in the NSA. While the NIRB notes that the NPC has a policy to provide direction to the NIRB, the nature of such direction and circumstances under which it may be provided to the NIRB remains unclear, the NIRB recommends that the NPC provide further clarification within the NLUP and supporting documents, while the DNLU assigns the entire NSA with a Recommendation to manage climate change. Option 2 that is put forth in the Options and Recommendations document encourages the Minister to advise the NIRB of potential issues or concerns regarding climate change to be considered during the review of project proposals. The NIRB agrees with the NPC's position that climate change is an important factor for all Project Proposals in the NSA, however, the NIRB's current understanding of the Option selected would involve the Minister providing advice to the NIRB only in the instance that it is undertaking a Review of a proposal pursuant to Part 5, Article 12 of the NLCA. The NIRB is not aware of the mechanism by which the Minister would provide the NIRB with advice regarding climate change in its consideration of project proposals which enter the regulatory regime and require only a screening level assessment in accordance with Part 4, Article 12 NLCA. The NIRB recommends that the NPC clarify the mechanism by which the Minister may provide such advice for screening level assessments, and whether or in which case further direction from the NPC may be warranted as pertaining to a consideration of climate change. The selection of Option 1 as a designation that permits all uses for the Hiukitak River appears to conflict with the Kitikmeot Inuit Association's directive to close Inuit Owned Lands (IOL) parcels in the area to mineral exploration. The Hiukitak River was identified as a special area of interest to the people of Bathurst Inlet and Umingmaktok. It is requested that the Options and Recommendations document provide additional justification for the selection of Option 1. The other options discussed restrict development in the area and appear to be more in line with the Kitikmeot Inuit Association's directive to close IOL parcels in the area to mineral exploration.	The Plan has been revised to address climate change as it relates to the board planning policies objectives and goals. The Hiukitak River has been designated as a Protected Area. NPC has revised the Plan so all General Terms take into account climate change.
NIRB-11	Nunavut Impact Review Board (NIRB)	14/02/2014	DNLUP	Chapter 2	Omissions	During its review of the DNLU, the NIRB noted that some important considerations appear to have been omitted from the document. These include a consideration of marine shipping, muskox and polar bear habitat, protected marine areas, Species at Risk, areas of biological importance, Conservation Areas, areas of significance to Inuit, Areas of Interest, and areas adjacent to National and Territorial Parks. It is recommended that the NLUP include a section that discusses these key components or, if no discussion is to be provided, include a section which identifies these components as areas of data gaps and confirm whether these could be considered for inclusion as may be appropriate at some later date. A clear plan and timeline for any future consideration and/or inclusion should be provided. Further to this, the NIRB notes that habitat fragmentation may occur if areas of key importance are granted status as areas where all uses are permitted. It is suggested that areas of key importance, once identified in the NLUP, be considered for more restricted designations.	The NPC has revised the Plan to take into account these important considerations.
NIRB-12	Nunavut Impact Review Board (NIRB)	14/02/2014	DNLUP	Chapter 2	Caribou	While the DNLU recommends that project proposals located within historic calving grounds take into consideration impacts on caribou calving, post calving and migration routes, no specific land use designation was assigned to any caribou calving grounds within Nunavut. Further, this section of the DNLU lists the general caribou calving period as occurring between May 15 and July 15 but does not appear to place any restrictions on land use activities during this period. It is recommended that the NPC clarify whether it had considered imposing "seasonal restrictions" for activities located in areas designated as recommended caribou calving grounds (PSE-R2). Further, page 18 of the Options and Recommendations document lists an option to assign a designation that provides seasonal restrictions (Caribou Protection Measures), however this option has not been contemplated further for inclusion within the DNLU. The NIRB also notes that no discussion of caribou management objectives in regions neighboring the NSA was not provided, and suggests that the NLUP identify and discuss how caribou management objectives, policies, and individual measures in neighbouring jurisdictions have been contemplated within the DNLU.	The DNLU has been revised to take into consideration the calving and post calving areas based upon the information that was provided during the public review of the plan. The Commission had an Independent Public review of the planning process and plan completed in June 2012. One of the underlying themes of that review was the need for planning partners to maintain realistic expectations if there is desire to have a 1st generation land use plan in place in a timely manner. The comments are appreciated however only certain issues are being addressed at this time. The specific issues are outlined in the plan.
NIRB-13	Nunavut Impact Review Board (NIRB)	14/02/2014	DNLUP	Chapter 2	Cumulative Impacts	The DNLU notes that the cumulative impacts of a project are an important component of managing land use in the NSA. However, no explanation regarding how cumulative impacts would be considered in land use planning was provided, nor were the steps that would be followed in making this consideration, or what the criteria or process would be for NPC to refer a project to the NIRB for screening on the basis of concern for cumulative impacts. The NIRB also notes that the NPC had previously indicated that the consideration of cumulative effects and referral of proposals to the NIRB on this basis may be removed from the DNLU and would be dealt with in a separate framework. While it appears from our review that the consideration of cumulative effects has been included within the DNLU at this stage, it appears that the relevant sections of the DNLU and the Options and Recommendations document do not include a clear discussion of how the NLUP would address projects with the potential to contribute to cumulative impacts. It is recommended that the DNLU and Operations and Recommendations document describe how cumulative impacts would be considered through land use planning, and discuss the management of any such impacts over time.	The DNLU has been revised to describe how Cumulative Impacts will be addressed and a procedure has been developed.
NIRB-14	Nunavut Impact Review Board (NIRB)	14/02/2014	DNLUP	Chapter 2	Cumulative Impact thresholds	In addition, the DNLU does not appear to contain information regarding the thresholds that would be used for considering potential cumulative impacts. The Options and Recommendations document does reference the fact that there are currently no agreed-upon thresholds, however the NIRB considers the development of thresholds for the consideration of cumulative impacts to be an essential component of this land use plan. It is suggested that NPC consider conducting extensive public consultation with land owners, environmental assessment practitioners and agencies like the NIRB, interest groups, and authorizing agencies to facilitate the development of agreed-upon thresholds for the consideration of potential cumulative impacts.	At this time the NPC is not coordinating the development of thresholds. The Commission's broad planning policies, objectives and goals require the NPC to implement thresholds and indicators developed by government and other IPGs. The Plan has been revised to identify in which specific situations the NPC may refer a project for cumulative impact concerns.
NIRB-15	Nunavut Impact Review Board (NIRB)	14/02/2014	DNLUP	Chapter 2	Trans boundary, Great Bear Lake Watershed	With respect to the option assigned to Great Bear Lake Watershed, the DNLU identifies the importance of the area and reflects the fact that management direction for the area in the Sahtu region of the Northwest Territories has yet to be finalized. The option also builds upon an existing planning policy framework but notes that it would become effective only at such time as the management direction for this area is agreed upon. The NIRB recommends that the NPC provide clarification with regard to how this designation would change once the management direction is approved and/or the Sahtu land use plan comes into effect.	The Sahtu Land Use Plan has been approved. The NPC will be reviewing the terms to determine appropriate management direction. Should the Sahtu Land Use Plan be amended in the future, the NLUP can be amended appropriately.
NIRB-16	Nunavut Impact Review Board (NIRB)	14/02/2014	DNLUP	Chapter 2	Transboundary, Heritage Rivers	It does not appear that transboundary considerations within the DNLU include a discussion on the Heritage Rivers that flow across the Nunavut border to/from other jurisdictions including the Thelon, Kazan and Coppermine (nominated) rivers. These rivers, with the exception of the Coppermine River, are discussed in Chapter 3 of the DNLU and are assigned land use designations based on the management plans of each Heritage River. The NIRB notes however, the importance of transboundary considerations for these rivers when dealing with land use issues. It is suggested that the DNLU include a discussion on how transboundary considerations were considered for these areas.	The Plan has been revised to address transboundary matters and heritage rivers/

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NIRB-17	Nunavut Impact Review Board (NIRB)	14/02/2014	DNLUP	Chapter 2	Transboundary, Caribou, linear infrastructure	The DLUP identifies oil and gas and hydroelectric development in neighboring jurisdictions in terms of considering developments having potential transboundary implications and possible impacts to the NSA. The NIRB suggests that the NPC consider revising this listing to include the potential development of linear infrastructure in jurisdictions adjacent to Nunavut which may have the potential to impact upon transboundary caribou herds and/or their habitat, as well as other species which are migratory in nature. Specifically related to caribou, the NIRB recognizes their importance as an essential species to Nunavummiut for subsistence and cultural purposes. Given this importance, development decisions and activities outside of the NSA which have the potential to impact upon caribou migration patterns, calving or post-calving areas and overall species health may be an important consideration for the NLUP and the planning process. Similarly, decisions to manage caribou in areas outside of the NSA (i.e. harvest quotas) may have implications for the species within Nunavut and the residents who depend upon them, as mentioned above. It is unclear whether this has been considered in the NPC's current DNLUP and supporting documentation and the NIRB recommends that any considerations or assumptions which are built into these materials which pertain to the consideration of transboundary impacts to caribou be clarified.	Harvesting quotas are not in the mandate of the NPC. NPC has looked at it's transboundary authority as set out by NUPPAA. The caribou section of the land use plan has been revised. Protected Areas and Special Management are used to protect the areas where there are no existing rights. Existing rights are protected under NUPPAA. Areas with existing rights or high mineral potential are designated Special Management. The DNLUP has been revised to address calving and post-calving areas. Change were made to some of the recommendations to reduce fragmentation of calving and post calving areas when possible.
NIRB-18	Nunavut Impact Review Board (NIRB)	14/02/2014	DNLUP	Chapter 2	Transboundary, consultation	It was unclear from the NIRB's review of the materials provided whether and to what extent the NPC may have consulted with government departments, other agencies and the general public within neighbouring jurisdictions. As the discussion relating to caribou and rivers provided above is similar, it may be useful to consider the various management, conservation, and development objectives developed and in place in neighboring jurisdictions when developing a Nunavut wide land use plan, especially where certain resources are transboundary by their very nature, and must be shared with other jurisdictions. The NIRB recommends that the NPC ensure those parties are informed and have had an opportunity to comment on the DNLUP.	Consultations have been conducted in accordance with Article 40. Revisions to the DNLUP have been made to reflect those consultations. Feedback has also been received from NWT First Nations, Métis groups and the GNWT.
NIRB-19	Nunavut Impact Review Board (NIRB)	14/02/2014	DNLUP	Chapter 3	Consistency with Article 9 - Conservation Areas	The NIRB recommends that the NPC confirm the list of areas and issues as identified within Chapter 3 and confirm whether it is meant to be consistent with the list identified in Article 9 of the NLCA for Conservation Areas, or if not, explain why this would be the case, and why certain conservation areas may not be represented within the DNLUP.	Chapter 3 is intended to be consistent with Articles 8 and 9 the Establishment of Parks and Conservation Areas through Legislation. The Plan is revised to note that the Plan is not a replacement of the NLCA or NUJPPAA.
NIRB-20	Nunavut Impact Review Board (NIRB)	14/02/2014	DNLUP	Chapter 3	Proposed Parks	The DNLUP has not identified any lands slated for withdrawal in the Bluensee Lake Area to be considered for a park, though the "Permitted Uses - Tourism, Recreation and Research" designation has been assigned. The DNLUP also refers to two other natural regions (Southampton Plain and Ungava Tundra Plateau) within Nunavut that are important but which have no formal park status ascribed to them. As no designation was assigned to the land use for these two regions, the NIRB recommends that the DNLUP and/or Options and Recommendations document provide a discussion as to how future proposed parks would be designated within the NLUP. Specifically, the NIRB recommends that the NPC confirm whether the designation under the NLUP for the Bluensee Lake Area would be subject to change if there were a land withdrawal, and whether the NPC would consider designations for the other two natural regions that are mentioned in the DNLUP?	The Bluensee Lake area is not currently withdrawn. As well, future parks are not withdrawn at this time for Southampton Plain and Ungava Tundra Plateau. Regarding the establishment of national parks the DNLUP only supports those proposals which are defined. The NPC would consider amendments to the Land Use Plan as proposals develop.
NIRB-21	Nunavut Impact Review Board (NIRB)	14/02/2014	DNLUP	Chapter 3	Parks Status clarification	The NIRB noted that the status or designation ascribed to 'National Parks Awaiting Full Establishment' and 'Proposed Parks' is unclear from our review of the DNLUP. It is recommended that the NPC provide clarification with respect to the difference between these two land descriptions and provide for the inclusion of each in the Definitions section of the document.	The NPC has considered clarifying the wording to provide an explanation of the two terms.
NIRB-22	Nunavut Impact Review Board (NIRB)	14/02/2014	DNLUP	Chapter 3	Heritage Rivers	This section does not provide a description of land use management for "Heritage Rivers Awaiting Designation (or nominated rivers)". As an example, no discussion appears to be provided regarding the management of the Coppermine River prior to a potential future designation as a Heritage River. It is recommended that a section be included in Chapter 3 of the NLUP that describes how rivers nominated for heritage status would be managed until such time as the status is granted, and discuss whether the NPC considered assigning a similar designation as would be provided for formal Heritage Rivers.	The NPC received no information in regards to Heritage Rivers awaiting full establishment. Consideration will be given should this information be provided in the future. The Plan can be amended to consider new proposals.
NIRB-23	Nunavut Impact Review Board (NIRB)	14/02/2014	DNLUP	Chapter 5	Outdated Mineral Exploration designation criteria	The Analysis and Recommendation for Mineral Exploration and Production section within the Options and Recommendations document focused on 8 potential mines that were identified in the Government of Nunavut's 2010 Nunavut Economic Outlook document. This information may be outdated as compared to projects currently undergoing assessment by the NIRB. The NIRB would be happy to provide updated information regarding ongoing assessments to the NPC for inclusion within a future NLUP and associated documents. Furthermore, the NPC may wish to consider including within the list of mines presented within the Options and Recommendations document, other advanced exploration sites, and mines currently undergoing assessment by the NIRB. The NIRB also recommends that the NLUP and Options and Recommendations document describe how the NPC may consider the assessment and/or approval of new major project developments, or significant amendments to previously approved major projects in terms of the NLUP and associated materials.	AANDC provided updated information regarding mineral potential. The plan has been revised accordingly. Despite numerous requests we were under to get consensus on the use of advanced exploration so the concept had to be abandoned as part of the revision.
NIRB-24	Nunavut Impact Review Board (NIRB)	14/02/2014	DNLUP	Chapter 5	Updates to Mineral Exploration designation criteria	In order to ensure the NLUP maintains current and up to date information, the NIRB recommends that the NLUP or Options and Recommendations document provide a list of criteria that would identify whether or not a proposal would be considered under the Mineral Exploration and Production section of the NLUP and which identifies whether or not the NPC would then assign the Encouraging Sustainable Economic Development (ESED-1) Land Use Designation to a specific proposal.	The revised DNLUP will include simplified Land Designations that should address the concern. Project proposals can straddle land use designations as long the uses are not prohibited.
NIRB-25	Nunavut Impact Review Board (NIRB)	14/02/2014	DNLUP	Chapter 5	Keewatin Oil and Gas Moratorium	The Keewatin Regional Land Use Plan makes mention of a moratorium on oil and gas exploration around Southampton Island, yet this does not appear to have been carried over into the DNLUP or discussed as part of the considered information when developing the options for managing oil and gas exploration and production. Reference was made to the North Baffin Regional Land Use Plan within the Options and Recommendations document as identifying oil and gas as influencing the regional mixed economy. It is recommended that NPC provide clarification regarding the exclusion of the moratorium on oil and gas in the Kivalliq region around the Southampton Island from the DNLUP, and indicate whether consultation has been conducted or is being considered regarding oil and gas exploration throughout any regions in Nunavut.	The Keewatin Regional Land Use Plan supported a moratorium that was put in place by NRCan. That moratorium has since been removed. As well, the Hamlet of Coral Harbour and Kivalliq Inuit Association have asked to not continue the moratorium.
NIRB-26	Nunavut Impact Review Board (NIRB)	14/02/2014	DNLUP	Chapter 5	Oil and Gas Potential	The NIRB also recommends that the NPC provide a discussion regarding the consideration of potential future development of oil and gas resources as well as exploration activities.	The Plan has been revised to expand the discussion.
NIRB-27	Nunavut Impact Review Board (NIRB)	14/02/2014	DNLUP	Chapter 6	Mixed Use Designation	This chapter discusses areas that can support a diverse mix of land uses to promote the well-being of communities; however in Table 1 of the DNLUP where mixed use (MU) is defined. It states that 'all uses are permitted'. It is unclear to the NIRB whether or how proposals would be assessed in a 'mixed use' region where potentially conflicting activities might occur, if all uses are to be permitted. It is recommended that the NPC more clearly describe this particular land use designation and provide clarification on how proposals would be assessed in a mixed use region. Further, the mixed use designation does not appear to be discussed within the Options and Recommendations document; the NIRB requests that the NPC confirm whether and which sections of the document may describe mixed uses and the consideration of land use activities within these areas.	Mixed use is common way of designating areas so as not to impede any potential land use in the future. The revised DNLUP will include General Terms, values and future regional and sub regional land use planning initiatives will further address the concern.
NIRB-28	Nunavut Impact Review Board (NIRB)	14/02/2014	Working Together		Process map	The NPC previously indicated that it continues to assess the value of process maps and while it recognized the NIRB's assistance in the creation of these maps, the NPC did not indicate whether or which of these maps would be included within the DNLUP. The current versions of the DNLUP and supporting documents do not clearly describe the NPC's process of receiving and considering project proposals submitted for a conformity determination against the NLUP, nor any details regarding the referral of those project proposals which conform, to the NIRB or other regulatory agencies. It is again recommended that the NPC provide within the NLUP or supporting documents, details or process mapping which outlines the current approach to conformity with the DNLUP. Further to the NIRB's prior submission and recognizing the timing for the NPC's finalization of the NLUP, the NIRB would also request that the NPC clarify its intended process for potentially revisiting the NLUP or its processes to reflect the coming into force of the Nunavut Project Planning and Assessment Act, should such revisions be required.	The Implementation strategy has been revised to include the conformity determination process. The process map has been included in the revised DNLUP.

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NIRB-29	Nunavut Impact Review Board (NIRB)	14/02/2014	Working Together	1.1.3	NLUP Procedures	This section has been removed from the previous working draft of the NLUP and now is referred to in Section 1.1.3 of the "Working Together" document. As part of the NPC's response to the NIRB's 2010 comments, it indicated that specific details regarding procedures and rules the Commission may use to assess land use applications were being developed outside of the NLUP. While no timeline was provided as to when the NPC anticipated these would be made available to the public, the NIRB notes that this information has not yet been provided. The NIRB again notes that the rules and procedures which are developed by the NPC remain of specific interest to the NIRB and are central to the provisions of NIRB's comments on the NLUP.	The Implementation strategy has been revised to include the relevant details related to implementation of the land use plan.
NIRB-30	Nunavut Impact Review Board (NIRB)	14/02/2014	DNLUP & Options and Recs		Ministerial Exemptions and Minor Variance	From the NIRB's review, it did not appear that either of the DNLUP or the Options and Recommendations document address the potential for Ministerial exemptions as per NLCA Section 11.5.11 for a project proposal. It is suggested that Chapter 7 of the DNLUP include a discussion of this possibility and any relation to, or processes involved for minor variances.	The revised DNLUP includes a general discussion on Ministerial exemptions, minor variances or a Plan amendment.
NIRB-31	Nunavut Impact Review Board (NIRB)		Options and Recommendations	2		The NIRB did not refuse coal exploration but recommended to the Minister that as the potential adverse impacts of the proposal were so unacceptable, that the proposal should be modified or abandoned. <b>Recommendation/Suggestion:</b> Suggest rewording the section to indicate that the NIRB makes recommendations but it is the Minister that makes the final decision on project proposal within the NSA.	The ORD has been revised to address this concern.
NIRB-32	Nunavut Impact Review Board (NIRB)		Options and Recommendations	2	Great Bear Lake Watershed	Justification for option assigned to Great Bear Lake Watershed identifies importance of area and reflects management direction for area in Sahtu region yet to be agreed upon and builds on existing planning policy framework. What would happen once the management direction for this area has been agreed upon? Request clarification from NPC on how this designation would change if and when management direction or Sahtu land use plan comes into effect. <b>Recommendation/Suggestion:</b> Suggest providing a discussion on how the designation would change based on when direction and/or plans are approved.	Response has been provided in previous comment.
NIRB-33	Nunavut Impact Review Board (NIRB)		Options and Recommendations	2	Climate Change	The selection of Option 2 for climate change does appear inconsistent with NPC's objectives for climate change in the NLUP. Option 2 encourages Minister to advise NIRB of potential issues or concerns regarding climate change to be considered during review of proposals; while NPC's objectives state: control and minimize greenhouse gas emissions, monitor climate change impact, encourage the development and adoption of adaptation strategies, and considers issues relating to changes in the landscapes due to climate change. <b>Recommendation/Suggestion:</b> Suggest Options and Recommendations document be updated to include a discussion on how NPC would implement these objectives.	Response has been provided in previous comment.
NIRB-34	Nunavut Impact Review Board (NIRB)		Options and Recommendations	3	Tourism, Recreation and Research	Are there any restricted uses/activities under the following Option: Assign a designation that permits tourism, recreation and research? As some of the future conservation areas are potential or known significant areas for various cultural and environmental reasons, (e.g., potential calving grounds), and there is limited data available on these areas, it may be prudent to identify limitations of land use for each conservation area. <b>Recommendation/Suggestion:</b> To include a list of options or explanation/clarification on the types of land uses that may be restricted under this option.	The NPC has revised the Land Use Designations to provide more clarification.
NIRB-35	Nunavut Impact Review Board (NIRB)		Options and Recommendations	Chapter 4	Community Drinking Water Supplies	Communities that have not considered development within their watershed(s) get an automatic Option 1 - a designation that permits all uses. Could the NPC make a recommendation to municipalities that have not considered this in their municipal plans to think about it for future revisions? <b>Recommendation/Suggestion:</b> Suggest that NPC consider providing a provision as part of the NLUP for municipalities that may not have accounted for development within their watershed(s) that these consider including this within municipal planning.	Response has been provided in previous comment.
NIRB-36	Nunavut Impact Review Board (NIRB)		Options and Recommendations	4	Aerodromes	Aerodromes - Option 1 have been assigned that permits all development. Airports where federal government has jurisdiction - clarify whether NLUP applies to this type of land tenure. <b>Recommendation/Suggestion:</b> Request clarification on Option 1 selection for Aerodromes.	Response has been provided in previous comment.
NIRB-37	Nunavut Impact Review Board (NIRB)		Options and Recommendations	5	Mineral Exploration and Production	The Analysis and Recommendation for Mineral Exploration and Production only focused on the 8 potential mines identified in the 2010 Nunavut Economic Outlook document. This document may be outdated. The list of mines presented within the NLUP does not consider other exploration sites that are in the advanced exploration stage or currently undergoing review by the NIRB. <b>Recommendation/Suggestion:</b> Suggest that section that describes "Considered information" on page 44 include mine and other major developments that are currently being assessed by the NIRB. This would include Sabina's Back River proposal and TMAC Resources Inc.'s Phase 2 Hope Bay Belt. Further, a description should be provided on how the NLUP would deal with future major projects that undergo assessment or reconsideration.	Response has been provided in previous comment.
NIRB-38	Nunavut Impact Review Board (NIRB)		Working Together	1.1.3		It would be useful if a reference is included on where the forms, directives and by-laws can be found. <b>Recommendation/Suggestion:</b> The documents identified are separate documents from the NLUP and a reference should be provided on where they can be obtained.	The documents will be provided as part of the NPC on-line public registry once NUPPAA is enacted. In the interim the Implementation Strategy contains relevant information and feedback compiled will inform those formal technical guides.
NIRB-39	Nunavut Impact Review Board (NIRB)		Working Together	1.3.2		The statement that NPC is the authority responsible for reviewing all proposals in the NSA is not complete Projects proposed within a park or a historic place must be submitted to the responsible authority for conformity (Section 164 of NuPPAA) <b>Recommendation/Suggestion:</b> Suggest that this section be expanded to confirm that any project that is to be carried out within a National Park or historic place is not reviewed by the NPC for conformity against the NLUP but that it is the responsible authority (Parks Canada Agency) that determines conformity with the specific requirements of the park. Noted that these may still be subject to screening by the NIRB.	The NPC does not manage land use within established Parks. The revised DNLUP contains clarity on this topic.
NIRB-40	Nunavut Impact Review Board (NIRB)		Working Together	1.3.2	Reference to Section 4.3	<b>Recommendation/Suggestion:</b> Include reference to section 4.3 at end of the sentence "The process is referred to as the Conformity Determination process" (see Section 4.3).	General comment noted.
NIRB-41	Nunavut Impact Review Board (NIRB)		Working Together	2.2.1		The number of factors were not defined. Factors should be included in this document or as a separate document. <b>Recommendation/Suggestion:</b> Provide the factors that would make implementation successful and suggest that this be provided in a separate document.	General comment noted.
NIRB-42	Nunavut Impact Review Board (NIRB)		Working Together	2.2.1(a)	Partner Roles	Clarification from NPC regarding the roles of each partner in the implementation of the NLUP. Not clear what the roles of each partner are with respect to the implementation of the NLUP. <b>Recommendation/Suggestion:</b> Suggest that the document identify the roles of each partner in the implementation of the NLUP. Potential that this could be discussed under section 3.	The DNLUP has been revised to provide clarity on the roles and the integrated regulatory process.
NIRB-43	Nunavut Impact Review Board (NIRB)		Working Together	2.2.1(d)	Monitoring	The point is not clear on how effective monitoring would occur and who the partners are. Not all partners are involved in monitoring of projects and this should be clarified in this point. Further, would the partners be responsible for reporting to NPC on the ability of the NLUP to deal with land use issues in Nunavut? <b>Recommendation/Suggestion:</b> Point needs to be clarified to indicate who the partners are expected to be, and how monitoring of the NLUP would be conducted. A strategy should be included on the ability of the NLUP to deal with land use issues in Nunavut. Potential for a separate guide to be created to explain or discuss further.	11.4.4(i) in the NLCA establishes the NPC's obligation to monitor projects to ensure that they are in conformity with Land Use Plans. The Implementation Strategy has been revised to more fully explain monitoring and periodic review of the Plan.
NIRB-44	Nunavut Impact Review Board (NIRB)		Working Together	2.2.1(e)		<b>Recommendation/Suggestion:</b> Not clear what is meant by commitment and who is supported? Reword point to clarify the statement.	General comment noted.
NIRB-45	Nunavut Impact Review Board (NIRB)		Working Together	3.2		<b>Recommendation/Suggestion:</b> Some of the descriptions of the institutions could be more detailed. Update NIRB section to be more descriptive.	General comment noted.
NIRB-46	Nunavut Impact Review Board (NIRB)		Working Together	3.3	Organization Names	Incomplete text - definitions not given for KiTA or KivIA. Section is incomplete. <b>Recommendation/Suggestion:</b> Add description of the two RIA's in 3.3.3.	General comment noted.
NIRB-47	Nunavut Impact Review Board (NIRB)		Working Together	3.4	Organization Names	Missing Government of Canada organizations in the list. Consider including Natural Resources Canada (NRCAN), Environment Canada (EC) and Canadian Coast Guard. <b>Recommendation/Suggestion:</b> Include a section for Natural Resources Canada (NRCAN), Environment Canada (EC) and Canadian Coast Guard	General comment noted.
NIRB-48	Nunavut Impact Review Board (NIRB)		Working Together	3.4.3-3.4.6	Organization Names	Section is incomplete. Incomplete text - no definitions for PC, TC, DFO or DND	General comment noted.

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NIRB-49	Nunavut Impact Review Board (NIRB)		Working Together	3.5	Organization Names	Missing Government of Nunavut organizations in the list. Consider including Culture & Heritage <b>Recommendation/Suggestion:</b> Include a section for Culture and Heritage	General comment noted.
NIRB-50	Nunavut Impact Review Board (NIRB)		Working Together	4.2.4		Acronym NUPPAA used in the document without either footnote reference or definition of the acronym. <b>Recommendation/Suggestion:</b> Suggest providing reference and/or table of acronyms in the document. This could be provided at the end of the document as an appendix.	General comment noted.
NIRB-51	Nunavut Impact Review Board (NIRB)		Working Together	4.3.10		Consider updating this section to be reflective of NuPPAA. <b>Recommendation/Suggestion:</b> A project is exempt from screening...set out in Schedule 12-1 of the NLCA and does not belong to a class of non-exempt works or activities prescribed by regulations	The revised DNLUP has the updated section reflective of NUPPAA.
NIRB-52	Nunavut Impact Review Board (NIRB)		Working Together	4.3.11		Clarification of term. This bullet uses 'board' to refer to the NIRB, however several boards are defined earlier in the document, and this point does not make clear which board is being referenced. <b>Recommendation/Suggestion:</b> Replace the use of board with the appropriate board name. In this case, suggest replacing 'board' with NIRB	The Plan has been revised.
NIRB-53	Nunavut Impact Review Board (NIRB)		Working Together	4.4.3		Current wording unclear. Condition of minor variance being considered is based on effects assessment criteria when a proposal has not yet received an effects assessment? <b>Recommendation/Suggestion:</b> Suggest other criteria than "negative effects" for satisfying this condition such as "project would not interfere with" or "have unacceptable effects". Section 4.5.8 d) b) on page 17 may have better wording to be used "b) result in an incompatible or obnoxious land use when viewed in the context of surrounding uses or interests."	The Plan has been revised.
NIRB-54	Nunavut Impact Review Board (NIRB)		Working Together	5.6.2		The NIRB does not have a mandate to monitor all projects and is not funded to do so. Requiring that planning partners have the capacity to monitor projects may prove problematic if it is not part of their individual mandate. Point requests a commitment and capacity for the Planning Partners to monitor projects when it may not be in the individual organizations mandates to monitor all projects. In addition, it would be impossible to determine the commitment and capacity to which the NPC is referring due to the lack of definition of monitoring or the criteria which will be assessed as part of the function. <b>Recommendation/Suggestion:</b> Suggest rewording this point to perhaps coordinate monitoring efforts.	The revised DNLUP provides clarity that monitoring refers to conformity with Land Use Plans.
NIRB-55	Nunavut Impact Review Board (NIRB)		Working Together	5.6.2		Second sentence is unclear about "reviewing project proposals" as it is NPC's responsibility alone to make the conformity determination. This statement is unclear as it could make reference to the NIRB's Review Process under Part 5 or 6 of the NLCA, or the NPC's review of a proposal in order to make a conformity determination, two very different processes. <b>Recommendation/Suggestion:</b> Clarify or reword the underlined part of the sentence for clarity: "Working together in monitoring and reviewing project proposals is critical to the success and effectiveness of the NLUP."	The Plan does not speak to NIRB's Review process. The Plan is intended to outline the NPC's processes.
NIRB-56	Nunavut Impact Review Board (NIRB)		Working Together	none		Table of Contents. Document usability. <b>Recommendation/Suggestion:</b> Suggest providing table of contents for document	General comment noted.
NIRB-57	Nunavut Impact Review Board (NIRB)	14/02/14	DNLUP	Definitions		Definition of IQ is inconsistent with those of the NIRB and QIA. Would be helpful if all agencies work with the same definition if possible. <b>Recommendation/Suggestion:</b> Suggest reconsidering the working definition.	The definition is from the NPC's broad planning policies, objectives and goals which was developed in consultation with the Government of Canada, Government of Nunavut and the NTL.
NIRB-58	Nunavut Impact Review Board (NIRB)	14/02/15	DNLUP	Definitions	Screening	Screening definition is not complete. Screening definition needs to include "significant ecosystemic and socio-economic impact potential" <b>Recommendation/Suggestion:</b> Suggest updating screening definition to read as follows: "means a process undertaken by the Nunavut Impact Review Board to determine if a Project Proposal has significant ecosystemic and socio-economic impact potential."	The revisions have been included in the revised DNLUP.
NIRB-59	Nunavut Impact Review Board (NIRB)	14/02/16	DNLUP	1		Not clear how data gaps will be addressed by the NLUP. There is no clear discussion on how data gaps identified (caribou, muskox, etc.) will be addressed by the current NLUP or the NPC in the future? <b>Recommendation/Suggestion:</b> The NLUP should include a discussion on how data gaps would be treated. Suggest adding a section to the NLUP.	Response has been provided in previous comment.
NIRB-60	Nunavut Impact Review Board (NIRB)	14/02/17	DNLUP	1.3.2	Athabasca and Manitoba Denesuline	It is unclear whether consideration of the Athabasca Denesuline and the Manitoba Denesuline were included in the DLUP for the areas that their title claims overlap with the NSA. Beneficial to mention whether and which Aboriginal groups with title claims that overlap with the NSA were involved in the land use planning process. <b>Recommendation/Suggestion:</b> Identify whether and which other Aboriginal groups with title claims overlapping with the NSA were included in the land use planning process.	Response has been provided in previous comment.
NIRB-61	Nunavut Impact Review Board (NIRB)	14/02/18	DNLUP	1.3.2		The level of government involved in the draft of the NLUP is not stated. It is unclear at first glance if this means the territorial and/or federal governments. <b>Recommendation/Suggestion:</b> Recommend the NLUP is clear regarding the level of government being referenced.	The revised DNLUP specifies Government to mean the Government of Canada and the Government of Nunavut.
NIRB-62	Nunavut Impact Review Board (NIRB)	14/02/19	DNLUP	1.3.4	Municipal Boundaries	Section 1.3.4 discusses application of the DNLUP - would be helpful to include clarification on projects within municipal boundaries in this particular section of the report. No specific section of the DNLUP clearly outlines the management of developments within municipal boundaries. Unclear whether community maps in Appendix A are intended to assist with understanding some of the potential land use activities within municipal boundaries. <b>Recommendation/Suggestion:</b> Request clarification regarding proposals within municipal boundaries the intended use of community maps in Appendix A. Municipal Boundaries do not appear to be discussed in Options and Recommendations document.	Response has been provided in previous comment.
NIRB-63	Nunavut Impact Review Board (NIRB)	14/02/20	DNLUP	2	Polar Bears	How were Polar Bears and other SARA listed species accounted for in the plan? Not apparent that SARA listed species and their habitat requirements were addressed. <b>Recommendation/Suggestion:</b> Habitat fragmentation may occur if areas of importance are permitted as areas where all uses are permitted. Request NPC clarify whether it considered these areas to be subject to other designations?	The NPC relies on Government experts to provide advice on this regard. The Plan reflects the feedback that was provided.
NIRB-64	Nunavut Impact Review Board (NIRB)	14/02/21	DNLUP	2		Appears to be missing discussion of marine shipping, muskox areas, polar bear habitat, protected marine areas, Species at Risk, areas of biological importance, Conservation Areas, areas of significance to Inuit, Areas of Interest, or areas adjacent to National and Territorial Parks. The NLUP should give consideration to marine shipping, muskox areas, polar bear habitat, protected marine areas, Species at Risk, areas of biological importance, Conservation Areas, areas of significance to Inuit, Areas of Interest, or areas adjacent to National and Territorial Parks. NLUP should also identify that these areas are part of the data gaps and would be looked at later. <b>Recommendation/Suggestion:</b> Suggest that the list of areas and issues be expanded to include the items as listed and discuss how data gaps will be addressed.	Response has been provided in previous comment.
NIRB-65	Nunavut Impact Review Board (NIRB)	14/02/22	DNLUP	2	Caribou	No land use designation was assigned to caribou calving grounds. Rationale should be provided on why no PSE were assigned to caribou calving grounds. <b>Recommendation/Suggestion:</b> Suggest a discussion be included in the NLUP	The caribou section of the land use plan has been revised. Protected Areas and Special Management are used to protect the areas where there are no existing rights. Existing rights are protected under NUPPAA. Areas with existing rights or high mineral potential are designated Special Management. The DNLUP has been revised to address calving and post-calving areas. Change were made to some of the recommendations to reduce fragmentation of calving and post calving areas when possible.
NIRB-66	Nunavut Impact Review Board (NIRB)	14/02/23	DNLUP	2.1.2		Land use designations seem to be ambiguous The NLUP contains 'Permitted and Prohibited Maps' for each of the 5 land use designations that identify areas in the NSA where it is recommended that impacts to caribou calving grounds be considered in the assessment of project proposals (PSE-R2). NPC has identified areas of importance to be protected (e.g., the Fosheim Peninsula is designated as PSE-2; key bird habitat site); however, resulting land use designations may present ambiguity in their implementation as PSE-2 permitted uses include tourism, research and recreation and do not prohibit any specific uses or activities from being carried out. <b>Recommendation/Suggestion:</b> While the DNLUP is helpful in identifying specific areas in the NSA of importance to be protected, request NPC provide clear guidance in establishing methods to protect such areas (e.g. by restricting certain activities) and clarify whether any activities will be prohibited where PSE-2 designations are provided.	The revised DNLUP has clarified the Land Use Designations.

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NIRB-67	Nunavut Impact Review Board (NIRB)	14/02/24	DNLUP	2.1.2	Caribou	This Section lists the general caribou calving period as occurring between May 15-July 15 but the DNLUP does not appear to place any restrictions on land use activities during this period. <b>Recommendation/Suggestion:</b> Request that NPC clarify whether 'seasonal restrictions' were considered for activities located in regions designated as recommended caribou calving grounds (PSE-R2). Further, the Options and Recommendations Document (page 18) list an option to assign designation that provides seasonal restrictions (Caribou Protection Measures) but this option was not considered - request justification.	The revised DNLUP addresses the caribou calving and post-calving grounds. Caribou protection measures are implemented by AANDC and DIOS. They are also outdated and cannot be applied consistently.
NIRB-68	Nunavut Impact Review Board (NIRB)	14/02/25	DNLUP	2	Cumulative Impacts	No information provided on the type of thresholds that would be used for cumulative impacts. Information should be provided on the thresholds that would be used. The Options and Recommendations document indicates that there are no agreed upon threshold. The development of thresholds for cumulative impacts is an essential component of the NLUP. <b>Recommendation/Suggestion:</b> Suggest that NPC consider public engagement to develop thresholds for cumulative impacts.	Response has been provided in previous comment.
NIRB-69	Nunavut Impact Review Board (NIRB)	14/02/26	DNLUP	2	Cumulative Impacts	No discussion provided on how cumulative impacts would be considered in land use planning, the steps that would be followed and when/how NPC would refer a project to the NIRB for screening on this basis. The NLUP refers to cumulative impacts of a project as being an important component of managing land use in the NSA. Further discussion should be provided on how this would be considered as part of the NLUP. This section and the Options and Recommendation document do not describe how the NLUP would handle projects with potential cumulative impacts. <b>Recommendation/Suggestion:</b> Recommend the NLUP or Options and Recommendations document provide a description of the consideration given to cumulative impacts as part of the conformity determination process.	Response has been provided in previous comment.
NIRB-70	Nunavut Impact Review Board (NIRB)	14/02/27	DNLUP	2	Heritage Rivers	Transboundary considerations do not include Heritage Rivers such as Thelon, Kazan and Coppermine (nominated) rivers. These rivers would be rivers have designations as heritage rivers (Coppermine has been nominated) but it is also important to consider transboundary issues for these rivers. <b>Recommendation/Suggestion:</b> Include designations for other areas that might be affected by transboundary issues.	Response has been provided in previous comment.
NIRB-71	Nunavut Impact Review Board (NIRB)	14/02/28	DNLUP	3	Conservation Areas	The list of areas and issues identified by NPC is not complete and appears inconsistent with the Conservation Areas identified by Article 9 of the NLCA. <b>Recommendation/Suggestion:</b> Suggest document includes the other conservation areas as identified in Article 9 of the NLCA or provide a discussion on why these conservation areas are not being identified within the NLUP	Response has been provided in previous comment.
NIRB-72	Nunavut Impact Review Board (NIRB)	14/02/29	DNLUP	3	Parks	The difference between National Parks awaiting Full Establishment and Proposed National Parks is unclear. <b>Recommendation/Suggestion:</b> Suggest NPC provide clarification on the difference contemplated between the two types of parks either in the DNLUP or Options and Recommendations document.	Response has been provided in previous comment.
NIRB-73	Nunavut Impact Review Board (NIRB)	14/02/30	DNLUP	3	Bluenose Lake Area	What would happen when there is a land withdrawn for the Bluenose Lake Area? Will the land use designation change? What about the two other natural regions mentioned? No discussion provided on when new parks are proposed and/or lands are withdrawn to be put in place as a Park. <b>Recommendation/Suggestion:</b> Suggest providing a discussion on future proposed parks and how they would be treated within the LUP.	Response has been provided in previous comment.
NIRB-74	Nunavut Impact Review Board (NIRB)	14/02/31	DNLUP	4		Encourage the NIRB, NwB, Inuit land managers and government regulators to identify and reduce impacts to humans and environmental health, especially community water sources, that may occur as a result of land use. This seems in contradiction to NPC's key component to building healthy communities. If this is important, it is the NIRB's recommendation that some protection be placed around communities waters if they haven't done so/communities should be advised to look at their water sources and make appropriate motions to ensure their water is protected. <b>Recommendation/Suggestion:</b> Suggest the NPC make a recommendation to municipalities that haven't accounted for this in their community plans to think about it for future revisions.	Response has been provided in previous comment.
NIRB-75	Nunavut Impact Review Board (NIRB)	14/02/32	DNLUP	6		Section 6 of the DNLUP discusses areas that can support a diverse mix of land uses to promote the well-being of communities; however in Table 1 where mixed use (MU) is defined, it states that 'all uses are permitted', which may be ambiguous where potentially conflicting activities might occur, where all uses being permitted. Request the NPC discuss its approach to managing uses for this particular designation. Also request that mixed use designation be discussed within the Options and Recommendations document.	Response has been provided in previous comment.
NIRB-76	Nunavut Impact Review Board (NIRB)	14/02/33	DNLUP	7.6 - Table 1		Will the periodic review include discussions with the NIRB? By conducting Screenings and Reviews, the NIRB would be able to provide valuable information on the impacts of activities in the various planning zones. <b>Recommendation/Suggestion:</b> To add a section in the Options and Recommendations document detailing how the Periodic Reviews will be conducted, which Parties will be asked to provide information and how the process to retrieve this information will be conducted.	The Implementation Strategy section regarding Periodic Review and Monitoring has been revised to address the concern.
NIRB-77	Nunavut Impact Review Board (NIRB)	14/02/34	DNLUP	7 - Table 1		The table identifies "permitted use" and for some sites "prohibited use". Further clarification required for sites that only have "permitted use" identified. Does this mean that any other use is not permitted by the LUP or will it be decided on a case by case basis? Need this to be identified in the table or in chapter 7. <b>Recommendation/Suggestion:</b> Table needs some further clarification on sites that only have permitted use and describe how other uses would be treated under the NLUP.	The revised DNLUP addresses this concern with clarified Land Use Designations. Uses that are prohibited would not conform to the plan. Conversely project proposals that are considered to conform to the plan would be sent along for further review by regulatory authorities.
NIRB-78	Nunavut Impact Review Board (NIRB)	14/02/35	DNLUP	7		List of sites identified under ESED not complete. List does not include Back River that is currently being reviewed by the NIRB. <b>Recommendation/Suggestion:</b> Suggest NPC revise list in consultation with the NIRB to include up to date list of advanced exploration and reasonably foreseeable projects.	The revised DNLUP addresses this concern with clarified Land Use Designations. The designation has caused confusion and required a change to the requirements.

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KWB-01	Nivvialike Area Co-Management Committee	4/14/2014	DNLUP	3.1.2.2	Bird Sanctuary	<p>The primary suggestion relates to the zoning and permitted and prohibited activities within migratory bird sanctuaries. Under the Draft Plan, migratory bird sanctuaries are zoned "ECP-2" where the permitted activities are tourism, recreation, research. This zoning also states that no activities are explicitly prohibited.</p> <p>The Nivvialik ACMC agrees with the permitted activities but would like to see the prohibited activities statement "All other activities are prohibited," similar to what is stated for the ECP-1 zoning for National Wildlife Area.</p> <p>The Kuugaarjuk (McConnell River) Migratory Bird Sanctuary is a sensitive area that is used by migratory birds during the nesting season as well as other species throughout the year. Kuugaarjuk is also very rich in cultural resources that need to be protected.</p>	<p>The Land Use Designations have been clarified in the revised DNLUP. The Plan reflects the expert advise provided from CWS where ever possible.</p>

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MWC-01	Mining Watch Canada	4/14/2014	DNLUP	2.1.2	Caribou	<p>We recommend that the Nunavut Land Use Plan exclude mineral exploration and development activities in the most critical of caribou habitats: calving and post-calving areas. This exclusion should extend to ancillary facilities and infrastructure that may be proposed for access to other areas for exploration and development.</p> <p>With the proposed prohibition, companies and those working to save the caribou will avoid the time-consuming and damaging conflict regarding industrial activities in these sensitive habitats and will benefit from a more efficient use of their limited resources.</p>	The revised DNLUP addresses calving and post-calving areas. Areas where there is no mineral potential have been protected from development. This amounts to nearly 5% of the NSA. Areas where there is believed to be mineral potential or existing mineral rights the Plan proposes cumulative impacts referrals and other Terms to ensure only project proposals that have been screened for impacts will be able to proceed into the regulatory process. The Plan also prioritizes research that needs to be undertaken to better protect caribou. This approach has been taken to minimize fragmentation of caribou habitat.
MWC-02	Mining Watch Canada	4/14/2014	DNLUP	5.1.1	Mining	<p>Because of the risks of managing radioactive wastes associated with uranium mining, and the controversial and high-risk aspects of the nuclear fuel chain, mining uranium raises a higher level of concern in communities than most other kinds of mining. This added level of concern is warranted and needs to be addressed if a uranium project is to achieve a social license to operate. (MiningWatch's position is that new uranium mines are unnecessary and undesirable but we respect the authority of communities to come to their own conclusions.)</p> <p>We submit that the requirement of the Keewatin Regional Land Use Plan for a demonstration of approval by the people in the affected region is an important policy for addressing the concerns about uranium mining, and that it should be included in the Nunavut Land Use Plan.</p>	The DNLUP looks at the land use of mining in general and does not consider individual commodities. Under the Nunavut Land Claims Agreement the Commission is responsible for determining conformity of project proposals. Government is responsible for determining this type of policy direction.
MWC-03	Mining Watch Canada	4/14/2014	DNLUP	5.1.1	Mining	<p>We recommend that in addition to established review and licensing procedures, advanced exploration and uranium mine proposals be required to demonstrate the Free Prior and Informed Consent (FPIC) of the affected communities in a transparent and accountable manner. As per established international-norms for FPIC, such as the UN Declaration on the Rights of Indigenous Peoples, the specifics of such a process must be developed with the affected communities and conducted in a manner that is acceptable and consistent with their values and customs.</p>	The comment is addressed above.

Comment ID	Organization Name	Date of Submission	Document Referenced	Section Referenced	Theme of submission or Location /ID# Referenced
BQCMB-1	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014	Options	p17	Caribou
BQCMB-2	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014	DNLUP	2.1.2	Caribou
BQCMB-4	Beverly and Qamanirjuaq Caribou Management Board	14/02/2014			

Comment ID	Organization Name	Date of Submission	Document Referenced	Section Referenced	Theme of submission or Location /ID# Referenced
BQCMB-5	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014	DNLUP		Caribou
BQCMB-6	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014	DNLUP/Options and Recommendations Document		Caribou
BQCMB-7	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014	DNLUP/Options and Recommendations Document		Caribou
BQCMB-8	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014	DNLUP/Options and Recommendations Document		Caribou

Comment ID	Organization Name	Date of Submission	Document Referenced	Section Referenced	Theme of submission or Location /ID# Referenced
BQCMB-9	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014	DNLUP/Options and Recommendations Document		Caribou
BQCMB-10	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014	DNLUP/Options and Recommendations Document		Caribou
BQCMB-11	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014	DNLUP/Options and Recommendations Document		Caribou
BQCMB-12	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014	DNLUP/Options and Recommendations Document		Caribou
BQCMB-13	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014	DNLUP/Options and Recommendations Document		ECP
BQCMB-14	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014	Working Together		Cumulative Impacts
BQCMB-15	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014	DNLUP		Transboundary
BQCMB-16	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014	KRLUP		

Comment ID	Organization Name	Date of Submission	Document Referenced	Section Referenced	Theme of submission or Location /ID# Referenced
BQCMB-17	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014	KRLUP		Uranium
BQCMB-18	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014			
BQCMB-19	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014			Caribou
BQCMB-20	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014			Caribou

Comment ID	Organization Name	Date of Submission	Document Referenced	Section Referenced	Theme of submission or Location /ID# Referenced
BQCMB-21	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014			Caribou
BQCMB-22	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	14/02/2014			Caribou

## Comment

### Clarification about the Position of the BQCMB

There is one major error in the Draft Plan that I would like to bring to your attention. In the Options and Recommendations document under "Calving Areas" and "Water Crossings" an erroneous statement is included three times (p. 17, 18, 19). "The direction of the Athabasca Dene and the Beverly-Qamanirjuaq Caribou Management Board is that no development should be permitted in caribou habitat."

The position of the Beverly and Qamanirjuaq Caribou Management Board is that "no development should be permitted in caribou calving and post-calving areas", not that "no development should be permitted in caribou habitat". The distinction between these statements is important, and is a key element of BQCMB input that has been provided to the NPC for land use planning over the years, including the comments we provided on the Working Draft Land Use Plan and the comments we are providing now and throughout the NPC's consultation process on the 2011/2012 Draft Plan.

Please note that the BQCMB is not against mining or other forms of economic development. But the Board believes that it is essential that key important caribou habitats should be protected to ensure that caribou herds can obtain their essential ecological requirements and continue to function as freeranging herds. This means that there are some places that should not be open to all human land uses at any time. Calving and post-calving areas are those crucial habitats for caribou.

To assist with further review of the Draft Plan by the BQCMB, we would appreciate receiving the following documents:

- Existing documents (Please confirm that you will be accepting comments on these documents until May 2014, as indicated in materials from your September 2013 workshop):
  - Working Together Document - draft implementation guide for the NLUP
  - Cumulative Impacts Referral Directive and reference map - for "conforming below threshold projects"
- Documents to be provided for review prior to the Public Hearing:
  - Revised Options and Recommendations document
  - Results of community consultations for Kivalliq and Kitikmeot regions

## Comment

There is recognition of the importance of caribou ecologically, culturally and economically in the description of the Commission's vision and in the background information provided in both the Draft Plan and the Options and Recommendations document. However, the management options recommended in the Draft Plan for managing land use in caribou habitat do not adequately reflect this importance, or the need to ensure that land use planning supports the long-term future of healthy caribou herds.

The primary inadequacies of the Draft Plan related to caribou include those outlined below.

- The management options recommended for caribou calving grounds are not adequate for protecting habitats in calving and post-calving areas and around water crossings from damage associated with industrial development, or for protecting caribou from disturbance when they are using these important habitats.
- No management actions are recommended for any seasonal ranges outside of calving grounds.
- The Caribou Protection Measures or similar measures are not recommended for protecting caribou from disturbance effects of mining exploration and development and other land use activities.

The lack of management options providing protection for important caribou habitats and caribou in the Draft Plan contrasts strongly with the position taken by the Commissioners in the Keewatin Regional Land Use Plan (p. 56), which was stated as follows: "The NPC continues to think that, by providing protection to certain critical areas, the majority of the planning region can remain open to exploration and development."

The BQCMB infers that the intent was that exploration and development was to be conditional on "providing protection to certain critical areas". The approach taken in the Draft Plan is not consistent with this position.

Our primary recommendations at this time are:

1) NPC should develop land use designations that protect caribou calving areas, post-calving areas, and water crossings from negative effects of commercial land use activities.

2) NPC should develop a land use designation that prohibits any new exploration and development in calving and post-calving areas and limits allowed land uses to traditional uses, tourism and research. No new infrastructure related to commercial development, including roads, airstrips, exploration camp buildings or tourism lodges should be allowed in calving and post-calving areas.

## Comment

3) NPC should protect all “recently used calving and post-calving areas” defined as all areas known to be used by caribou within the last 20 years based on a) tracking caribou (collared cows) by telemetry b) results of calving ground surveys and c) IQ and local knowledge, with obvious outliers removed. Delineation of these areas should be redefined based on all available information every 5 years.

4) If the NPC is unable to implement the land use management recommendations of the BQCMB, Kivalliq HTOs and Nunavut Regional Wildlife Boards, NPC and signatories to the land use plan should establish a clear process for resolving the issue of conflicting views concerning protection of caribou calving grounds, post-calving areas and water crossings.

5) NPC should develop a land use designation that provides seasonal restrictions on land use activities within 10 km of designated water crossings.

6) NPC should develop a land use designation that provides seasonal restrictions on land use activities on caribou range outside calving and post-calving areas and water crossings that applies conditions similar to Caribou Protection Measures to minimize disturbance to caribou.

7) NPC should apply land use designation ECP-1 “Assign a designation that permits tourism, recreation and research and prohibits all other uses” to the Thelon Wildlife Sanctuary, the Queen Maud Gulf Migratory Bird Sanctuary and the Thelon and Kazan Heritage Rivers.

8) NPC should clearly describe how the Cumulative Impacts Referral process will operate and what the respective roles of NPC, NIRB and other parties will be for identification, assessment, monitoring and mitigation of cumulative effects.

9) NPC should clearly describe how the Plan will consider transboundary effects when making land use planning decisions that may affect Aboriginal caribou harvesters from adjacent jurisdictions, and how planning decisions may be influenced by input from these groups.

10) NPC should explain why the types of direction provided by Action 2.6, the “Code of Good Conduct for Land Users” and the Caribou Protection Measures, which are measures in the Keewatin Regional Land Use Plan designed to provide protection for caribou (and other wildlife in some cases), were not adapted for inclusion in the Draft Plan.

## Comment

11) NPC should provide clear rationale as to why Action 3.6 from the Keewatin Regional Land Use Plan, which states that “proposals to mine uranium must be approved by the people of the region”, was not carried forward into the Draft Plan.

Decisions made by NPC and land claim signatories could affect the fate of many caribou herds and the sustainability of traditional cultures in numerous communities that have depended on harvest of caribou, in Nunavut as well as neighbouring jurisdictions. Due to the shared nature of the renewable resource provided by the Beverly, Qamanirjuaq and other caribou herds, how Nunavut plans for this increasing land use is of great interest to the BQCMB and the governments and communities both inside and outside Nunavut that the Board represents. Evidence for this common concern and the desire for protection of caribou calving and post-calving areas among caribou harvesters and the organizations that represent them has been provided through resolutions and other statements to NPC and others by many Nunavut organizations as well as other Aboriginal organizations. Attachment D provides the documents that are available to the BQCMB at this time that demonstrate this common position is held by:

- Nunavut’s three regional wildlife boards: Kivalliq Wildlife Board, Kitikmeot Wildlife Board, Qikitarjuaq Wildlife Board
- Kivalliq Hunters and Trappers Organizations: Arviat HTO, Baker Lake HTO, Chesterfield Inlet HTO, Whale Cove HTO
- Aboriginal organizations that represent caribou harvesters outside Nunavut: Athabasca Denesuline Né Né Land Corporation, Fort Smith Métis Council, Lutsel K’e Dene First Nation.

Attachment A. Background for BQCMB Comments on the Draft Nunavut Land Use Plan *[Not included in table]*

Attachment B. Comments and Recommendations for Revisions to Draft Nunavut Land Use Plan  
*[Additional details on 11 recommendations listed above - not included in table]*

## Comment

Attachment C. Role of the Nunavut Land Use Plan for Managing Caribou Habitat in Nunavut *[Details not included in table regarding correspondence between the BQCMB and NIRB regarding the management of caribou habitat in Nunavut]* ... It is clear that the NPC is the sole Nunavut organization that has a mandate broad enough to address the concerns of the BQCMB, the Kivalliq Hunters and Trappers Organizations, the Kivalliq Wildlife Management Board, and caribou users both inside and outside of the Nunavut Settlement Area. It is clearly the role of the Nunavut Land Use Plan to provide guidance for management of caribou habitat in Nunavut.

Attachment D. Statements from Organizations Representing Traditional Caribou Harvesters Recommending Protection of Caribou Calving and Post-calving Areas.

- Nunavut's three regional wildlife boards:

- 1) Kivalliq Wildlife Board
- 2) Kitikmeot Wildlife Board
- 3) Qikitarjuaq Wildlife Board

- Kivalliq Hunters and Trappers Organizations:

- 4) Arviat HTO
- 5) Baker Lake HTO
- 6) Aqigiq (Chesterfield Inlet) HTO
- 7) Arviq (Repulse Bay) HTO
- 8) Issatik (Whale Cove) HTO

- Aboriginal organizations that represent caribou harvesters outside Nunavut:

- 9) Athabasca Denesuline Né Né Land Corporation
- 10) Fort Smith Métis Council
- 11) Lutsel K'e Dene First Nation

## NPC Response

The Options and Recommendations document has been revised.

The revised DNLUP addresses calving and post-calving areas. Areas where there is no mineral potential have been protected from development. This amounts to nearly 5% of the NSA. Areas where there is believed to be mineral potential or existing mineral rights the Plan proposes cumulative impacts referrals and other Terms to ensure only project proposals that have been screened for impacts will be able to proceed into the regulatory process. The Plan also prioritizes research that needs to be undertaken to better protect caribou. This approach has been taken to minimize fragmentation of caribou habitat.

Please see the NPC website for the requested documents.

[Http://www.nunavut.ca/en/downloads](http://www.nunavut.ca/en/downloads)

## NPC Response

The DNLUP has been revised. Please review the information that was considered in the decision. This information is available in the Options and Recommendations Document.

Comment has been addressed above.

Comment has been addressed above.

Comment has been addressed above.

## NPC Response

Comment has been addressed above.

Comment has been addressed above.

We have not received information regarding the location of water crossings. Therefore water crossings are not included in the Draft Plan.

Comment has been addressed above.

The Plan has been revised to provide for protected areas and special management areas been applied to the areas suggested. .

The Implementation Strategy of the Plan has been revised to bring clarity to what types of project proposals and when projects may be referred.

The NPC has consulted with the aboriginal groups in Saskatchewan and Manitoba in adjacent jurisdictions as contemplated under Article 40 of the NLCA.

The Keewatin Plan was approved in June 2000. This Plan will have the support of federal legislation and is enforceable. Aspects of the Code of Good Conduct and caribou protection measures are dated. As Government develops standards to managing the caribou herds the Plan can be amendment to incorporate setbacks and other direction as research and policy be mutually supportive.

## NPC Response

The DNLUP looks at the land use of mining in general and does not consider individual commodities. Under the Nunavut Land Claims Agreement the Commission is responsible for determining conformity of project proposals. Government is responsible for determining this type of policy direction.

Comment has been addressed above

Information considered

Information considered

## NPC Response

Comment has been addressed above

Information. These submission are posted on the NPC DNLUP Consultation Record

Comment ID	Organization Name	Date of Submission	Document Referenced	Section Referenced	Theme of submission or Location /ID# Referenced	Comment	NPC Response
WWF-1	World Wildlife Fund	14/02/2014	Option and Recommendations	Chapter 2	Caribou	WWF supports the rationale for conserving caribou and protecting caribou habitats (calving and post-calving areas, sea ice crossings and water crossings) stated "up-front" in the 2011/2012 draft Nunavut Land Use Plan (NLUP), as well as the general recommendations PSE-R2, PSE-R3 and ECP-R1 in the Plan, and the management Options identified in the Options and Recommendations (O&R) document. We do not support all the Options that are actually recommended by NPC. We believe that some of NPC's recommended Options for caribou habitats are inconsistent with the ecological, cultural and economic value of these areas, as determined by Nunavummiut, the scientific community, governments, caribou management boards, non government organizations, and by NPC itself. In keeping with the mention of Species at Risk meriting "special attention" in the NLUP, WWF has made specific recommendations regarding the Dolphin and Union herd and Peary caribou in the Caribou Sea Ice Crossings section of our submission, as well as for areas of known concentration of Peary caribou in the High Arctic. Further, everything we have recommended regarding calving and post-calving areas for Nunavut's migratory tundra mainland herds is meant to apply to these two special caribou populations as well.	The revised DNLU addresses calving and post-calving areas. Areas where there is no mineral potential have been protected from development. This amounts to nearly 5% of the NSA. Areas where there is believed to be mineral potential or existing mineral rights the Plan proposes cumulative impacts referrals and other Terms to ensure only project proposals that have been screened for impacts will be able to proceed into the regulatory process. The Plan also prioritizes research that needs to be undertaken to better protect caribou. This approach has been taken to minimize fragmentation of caribou habitat.
WWF-2	World Wildlife Fund	14/02/2014	Option and Recommendations	Chapter 2	Caribou	For Caribou Calving and Post-Calving Areas (Figure 1 and 2): 1) Assign a designation that prohibits all new industrial uses in core calving and post-calving areas representing 95% occupancy. The only uses that should be permitted in these cores are tourism and research—subject to special conditions when calving caribou are present.	Comment addressed above
WWF-3	World Wildlife Fund	14/02/2014	Option and Recommendations	Chapter 2	Caribou, Parks, Wildlife areas	For Caribou Calving and Post-Calving Areas (Figure 1 and 2): 2) WWF supports NPC's recommended management Option 1 for the proposed Bathurst National Park, Thelon Wildlife Sanctuary and all National Wildlife Areas.	General comment noted.
WWF-4	World Wildlife Fund	14/02/2014	DNLUP/Option and Recommendations	2.1.2, Chapter 2	Caribou, Parks	For Caribou Calving and Post-Calving Areas (Figure 1 and 2): 3) Assign a designation that permits tourism, recreation and research and prohibits all other uses in the proposed Blue Nose Lake Area National Park, until such time as the Park boundaries have been agreed upon by the affected communities and a Park management plan has been developed.	Comment addressed above
WWF-5	World Wildlife Fund	14/02/2014	Option and Recommendations	Chapter 2	Caribou	For Caribou Sea Ice Crossings and Peary Caribou Terrestrial Habitat (Figure 3 and 4): 1) Assign a designation that provides seasonal restrictions and conditions on all (industrial) development, such as shipping and ice breaking, for caribou sea ice crossings, especially for the Dolphin and Union herd and Peary caribou.	We did not receive any information regarding a time when the access restrictions would occur so a defensible seasonal management term could not be developed. The Plan does provide Direction to regulatory Authorities to take them into account during permitting and licensing.
WWF-6	World Wildlife Fund	14/02/2014	Option and Recommendations	Chapter 2	Caribou	Pg 5 - For Caribou Sea Ice Crossings and Peary Caribou Terrestrial Habitat (Figure 3 and 4): 2) For the all terrestrial habitat, particularly the Fosheim Peninsula and Eastern Axel Heiberg Island area, assign a designation that permits tourism, recreation, research and prohibits all other uses.	The land use designations have been simplified. The Plan only identifies prohibited uses. Protected areas and special management are used to manage varying characteristics.
WWF-7	World Wildlife Fund	14/02/2014	Option and Recommendations	Chapter 2	Caribou	Pg 5 - For Caribou Water Crossings:3) Assign a designation that allows for seasonal restrictions and conditions on industrial uses that could negatively impact the ecological significance of these sites for caribou.	Comment has been addressed above
WWF-8	World Wildlife Fund	14/02/2014	Option and Recommendations	Chapter 3	Caribou, Heritage Rivers	Pg 5 - For Caribou Water Crossings: 4) WWF supports NPC's recommended Option 1 for the portion of the Soper Heritage River that lies outside Katanilik Territorial Park.	General comment noted.
WWF-9	World Wildlife Fund	14/02/2014	Option and Recommendations	Chapter 3	Caribou, Heritage Rivers	Pg 5 - For Caribou Water Crossings: 5) Assign a designation that permits tourism, recreation and research and prohibits all other uses for the Thelon and Kazan Heritage Rivers.	Comment has been addressed above
WWF-11	World Wildlife Fund	14/02/2014	DNLUP	Table 2: Recommendations	Caribou	Pg 6 -On page 43 of the Plan, in Table 2, NPC assigns the following general Recommendation (PSE-R2) regarding caribou calving and post-calving areas, to be implemented by Regulatory Authorities, DIOs, Municipalities, and Proponents: "Project Proposals located in historic caribou calving grounds should take into account impacts on caribou calving, post-calving and migration routes." In WWF's view, such general language as "take into account impacts" is too vague and permissive, given the importance assigned to caribou and their calving and post-calving areas earlier in the Plan.	Comment has been addressed above
WWF-12	World Wildlife Fund	14/02/2014	Option and Recommendations	Chapter 3	Caribou, Parks	Pg 7 -Of particular interest to WWF are the proposed Bathurst Island National Park, the proposed Bluemose Lake Area National Park, the Thelon Wildlife Sanctuary and all National Wildlife Areas (NWAs). WWF's specific recommendations for these areas are outlined in the section that follows. WWF's Recommendations regarding Caribou Calving and Post-Calving Areas:1) WWF recommends that NPC select Option 2, namely "assign a designation that restricts (prohibits) all (new industrial) development" in core calving and post-calving areas, representing 95% occupancy—See Figure 1.	Comment has been addressed above. Land use designations have been applied to these areas.
WWF-13	World Wildlife Fund	14/02/2014	DNLUP	2.1.2	Caribou	Pg 7 - In the case of the Beverly herd, there is debate as to whether this calving area (historic calving areas) is being used at all, although WWF recommends that it would be wise to protect at least the recently-known core. In case the Beverly herd re-establishes itself and re-occupies a calving area used by over 200,000 animals for decades. The core (or priority) calving and post-calving areas are those known to be utilized by 95% of calving animals every year in the recent past. WWF recommends that the spatial definition of such core areas should be updated every five years, as new data become available, and included in the scheduled overall review of the NLUP. WWF further recommends that the only uses that should be permitted in these cores areas are tourism and research— subject to special conditions when calving caribou are present, agreed upon by the Government of Nunavut (GN), Aboriginal Affairs and Northern Development Canada (AANDAC), and Designated Inuit Organizations (DIOs). Implementation of these restrictions should be monitored by observers from local Hunters and Trappers Organizations (HTOs).	Comment has been addressed above
WWF-14	World Wildlife Fund	14/02/2014	Option and Recommendations	Chapter 3	Caribou, Parks	Pg 8 - 2) WWF supports NPC's recommended Option 1 for the proposed Bathurst National Park, Thelon Wildlife Sanctuary and all NWAs, namely, "Assign a designation that permits tourism, recreation and research and prohibits all other uses," and we support NPC's reasons for recommending this Option in each case. We also believe that this Option would provide adequate protection to caribou calving and post-calving areas and to caribou when they are using them.	Comment has been addressed above. Land use designations have been applied to these areas.

WWF-15	World Wildlife Fund	14/02/2014	Option and Recommendations	Chapter 3	Caribou, Parks	Pg 8 -3) WWF does not support NPC's recommended Option 3 for the proposed Blue Nose Lake Area National Park. In our view, this Option would not provide adequate protection for caribou calving and post-calving grounds, and would allow additional uses that may not be permitted in the Park management plan when it is developed. Instead, WWF recommends Option 1, namely "Assign a designation that permits tourism, recreation and research and prohibits all other uses," until such time as the Park boundaries have been agreed upon by the affected communities, and a Park management plan has been developed. This recommendation would provide at least interim protection to caribou calving and post-calving areas, and keep the broadest range of options open to Nunavummiut and to Canadians when it comes to formal Park establishment and developing a Park management plan.	Comment has been addressed above. Land use designations have been applied to these areas.
WWF-16	World Wildlife Fund	14/02/2014	Option and Recommendations	Chapter 3	Caribou	Pg 9 - WWF's recommendation regarding the Fosheim Peninsula and Eastern Axel Heiberg Island area, especially for its significance to Peary caribou, is outlined below. WWF's Recommendation Regarding Caribou Sea Ice Crossings and Peary Caribou Habitat. 4) WWF recommends NPC's Option 4, which would "assign a designation that provides seasonal restrictions" for all caribou sea ice crossings. This recommendation is especially important for the Dolphin and Union herd crossing between the mainland and Victoria Island (NPC's Map 56), and for all Peary caribou sea ice crossings in the High Arctic Islands, including between Prince of Wales and Somerset Islands (NPC's Map 57). WWF's recommended option would not require permanent protection of these crossing areas, or closure to all industrial development. But there should at least be seasonal restrictions and conditions on shipping and ice- breaking during the spring and fall periods when caribou are using these crossing sites for their annual migration...	Comment has been addressed above. Land use designations have been applied to these areas.
WWF-17	World Wildlife Fund	14/02/2014	Option and Recommendations	Chapter 2	Caribou	Pg 10 - WWF further recommends that any restrictions/conditions for shipping and ice-breaking in or near caribou sea ice crossings should be arrived at in consultation with the shipping industry and with HTOs from the affected communities, who should be seasonally employed both onshore and onboard, to advise shippers onsite during the affected seasons, and to ensure that the agreed-upon restrictions/conditions are followed.	Comment has been addressed above. Land use plans cannot "require" a proponent to consult and engage residents. There is a general comment in the Plan that encourages engaging Inuit early on the process.
WWF-18	World Wildlife Fund	14/02/2014	Option and Recommendations		Caribou	Pg 10 -With respect to endangered Peary Caribou, WWF recommends that all terrestrial habitat be identified in the NLUP as PSC sites by NPC, and that the recommended management Option be similar to Option 1, as identified for a number of ECP sites, namely "assign a designation that permits tourism, recreation and research and prohibits all other uses."	This concern has been addressed in the revised DNLUP based on the information that has been provided to the NPC by Government.
WWF-20	World Wildlife Fund	14/02/2014	Option and Recommendations	Chapter 3	Caribou, Heritage Rivers	Pg 10 -In the O&R document, NPC identifies four management Options for the three Heritage Rivers designated so far in Nunavut: the Soper, Thelon and Kazan. WWF's recommendations regarding NPC's recommended management Options for these three Heritage Rivers follow in the section below. WWF's Recommendations regarding Caribou Water Crossings- 6) WWF recommends Option 4 for all traditionally-known caribou water crossings in the NSA, namely that they be assigned a designation that allows for seasonal restrictions and conditions upon industrial uses that could negatively impact the ecological significance of these sites for caribou, and that protects caribou when they are using them.	Response has been provided for a previous comment.
WWF-21	World Wildlife Fund	14/02/2014	Option and Recommendations	Chapter 3	Heritage Rivers	Pg 11 - 7) WWF supports NPC's recommended Option 1 for the portion of the Soper River watershed outside of Katannilik Territorial Park, namely, "Assign a designation that permits tourism, recreation and research, and prohibits all other uses."	Response has been provided for a previous comment.
WWF-22	World Wildlife Fund	14/02/2014	Option and Recommendations	Chapter 3	Caribou, Heritage Rivers	Pg 11 - 8) WWF does not support NPC's recommended Option 3 for the Thelon and Kazan Rivers, because it permits all uses and only provides for recommending that project proponents "consider the guidelines and criteria contained in the Heritage Rivers management plan." In our view, this Option does not best support the intent, objectives or policies NPC outlines for Encouraging Conservation Planning land use designations, does not provide adequate protection for caribou crossing sites along these two rivers, and in the case of the Thelon is inconsistent with its international status as a wilderness canoeing destination and NPC's own recommended Option for the Thelon Wildlife Sanctuary where most of the Thelon River is found. Further, we can see no compelling reason for providing less protection to the Thelon and Kazan than for the Soper Heritage River. Therefore WWF recommends that NPC recommend Option 1 for the Thelon and Kazan Heritage Rivers, namely, "Assign a designation that permits tourism, recreation and research, and prohibits all other uses."	General comment noted. The DNLUP has been revised.
WWF-23	World Wildlife Fund	14/02/2014	Option and Recommendations		EBSAs	Pg 18 - Recommended Option for Marine Habitat: Ecologically and Biologically Significant Areas (Figure 1) Option 2 is recommended as it supports the Goal of Protecting and Sustaining the Environment: "Assign a designation that permits all activities but with seasonal restrictions specific to each EBSA. For conforming and approved project proposals, provide a recommendation to regulators and proponents to consider potential impacts on wildlife and landscape values that must be considered outside of the seasonal restrictions." This option requires site-specific assessments to be undertaken for each EBSA, which will take into account: The specific biological and ecological characteristics of each EBSA. The potential stressors on those significant characteristics. The risks of impacts from inappropriate activities. Site-specific mitigative measures, including seasonal and other restrictions WWF strongly recommends that these assessments be undertaken with some urgency, that they incorporate the best available scientific and traditional knowledge, and that they involve local interests. In light of the knowledge gaps that exist, a precautionary approach is required. Such an approach is needed to ensure that future conservation options are not foreclosed in areas that have been identified as ecologically or biologically significant. Furthermore, a precautionary approach helps to clearly identify knowledge gaps and generate a shared incentive to address these knowledge gaps, since it holds out the possibility of relaxing restrictions once the area is better understood.	The Implementation Strategy of the Plan contains a section on research priorities that would support future land use planning decisions.
WWF-24	World Wildlife Fund	14/02/2014	Option and Recommendations		Polynyas	WWF recommends that all polynyas be zoned for protection and we propose the option that follows: Recommended Options for Polynyas (Figure 1). Option 2 is recommended as it best supports the Goal of Protecting and Sustaining the Environment. Assign a designation with seasonal restrictions & prohibits installation of year-round infrastructure. The seasonal restrictions would apply to mineral exploration, development and operations activities so as to prevent disturbance to wildlife species using Polynya for breathing, resting and foraging. The seasonal restriction would extend from freeze-up to break-up - when polynyas form and disintegrate.	Comment addressed above. The revised DNLUP has taken this into account.
WWF-25	World Wildlife Fund	14/02/2014	Option and Recommendations		Polar Bear	Recommended Option for Maternal Terrestrial Polar Bear Denning Areas. Option 2 is recommended as it best supports the Goal of Protecting and Sustaining the Environment. Assign a designation that permits all activities but with seasonal restrictions. For conforming and approved project proposals, provide a recommendation to regulators and proponents that potential impacts on the wildlife and landscape values must be considered outside of the seasonal restrictions. Option 2. Assign a designation that permits all activities but with seasonal restrictions. For conforming and approved project proposals, provide a recommendation to regulators and proponents to consider potential impacts on the wildlife and landscape values that must be considered outside of the seasonal restrictions. Recommended Restrictions: All activities are prohibited in known polar bear denning habitat during the main denning period; dates to be set regionally using Inuit knowledge and scientific research. Research during denning period limited to studies that directly address wildlife or ecological issues.	The revised DNLUP has taken this into account. NPC could consider seasonal restrictions but dates are required. Polar Bear Denning Areas have been addressed in the Plan.

WWF-26	World Wildlife Fund	14/02/2014	Option and Recommendations		Polar Bear	Pg 28 - Recommended Option for Polar Bear Summer Retreat Habitat. Option 2 is recommended as it best supports the Goal of Protecting and Sustaining the Environment. Assign a designation that permits all activities but with seasonal restrictions. For conforming and approved project proposals, provide a recommendation to regulators and proponents that potential impacts on the wildlife and landscape values must be considered outside of the seasonal restrictions.	Timelines are required for the Plan to implement seasonal restrictions.
WWF-27	World Wildlife Fund	14/02/2014	Option and Recommendations		Polar Bear	Pg 29 - Recommended Option for Polar Bear Sea Ice Habitat. Option 3 is recommended as it best supports the Goal of Protecting and Sustaining the Environment while considering economic development. Assign a designation that permits all uses. For conforming and approved project proposals, provide a recommendation to regulators and proponents that potential impacts on the wildlife and landscape values must be considered. Option 3: Assign a designation that permits all uses. For conforming and approved project proposals, provide a recommendation to regulators and proponents that potential impacts on the wildlife and landscape values must be considered.	At this time Polar Bear Denning is the only area being considered for Special Management. One of the underlying themes of that review was the need for planning partners to maintain realistic expectations if there is desire to have a 1st generation land use plan in place in a timely manner. The comments are appreciated however only certain issues are being addressed at this time. The specific issues are outlined in the plan.
WWF-28	World Wildlife Fund	14/02/2014	Option and Recommendations		Archipelago	Pg 36 - It is best to take a precautionary approach, and as recommended in the Arctic Biodiversity Assessment of the Arctic Council's working group on Conservation of Arctic Flora and Fauna: "Develop and implement mechanisms that best safeguard Arctic biodiversity under changing environmental conditions, such as loss of sea ice, glaciers and permafrost. a) Safeguard areas in the northern parts of the Arctic where high Arctic species have a relatively greater chance to survive for climatic or geographical reasons, such as certain islands and mountainous areas, which can act as a refuge for unique biodiversity. b) Maintain functional connectivity within and between protected areas in order to protect ecosystem resilience and facilitate adaptation to climate change."	Terms of a land use plan typically need to be clear and defensible. The land use plan could implement "mechanisms" but they first need to be developed and provided to the NPC for consideration.
WWF-29	World Wildlife Fund	14/02/2014	DNLUP	Schedule B	Archipelago	Pg 36 - WWF agrees with the Protecting and Sustaining Environment (PSE) designations for the PSE-R1 (Key Bird Habitat Sites) and PSE-R2 (Historic Peary caribou calving and migration routes) that have been applied in the Archipelago region. But the recommendation for the PSE designation should be strong and require that project proposals "must" take into account impacts on birds and caribou.	General comment noted. The recommendations have been changed to address this concern.
WWF-30	World Wildlife Fund	14/02/2014	DNLUP	Schedule B	Archipelago	WWF agrees with the Building Healthy Communities (BHC) recommendations BHC-R2 (traditional lands) and BHC-R4 (Eureka) in the Archipelago region. In particular the BHC-R2 designation recognizes the historic and current importance of sea ice and marine ecosystems to Inuit culture, traditions transportation, and community health.	General comment noted.
WWF-31	World Wildlife Fund	14/02/2014	DNLUP	Schedule B	Archipelago, ESED	WWF agrees with the Encouraging Sustainable Economic Development (ESED) recommendations ESED-R1 (potential fisheries) in Jones Sound but does not agree with the ESED-R1 (potential fisheries) in Greely Fiord and Archer Fiord of the Archipelago region. The ESED-R1 areas in Jones Sound present an important opportunity for Grise Fiord to develop a local, sustainable fishing industry. But the ESED-R1 areas in Greely and Archer Fiords should be revisited. Arctic char at extreme latitudes do not grow as quickly and are not as productive as stocks further south. It is possible that a fishery there could easily deplete the stocks if exploited.	General comment noted.
WWF-32	World Wildlife Fund	14/02/2014	DNLUP		Archipelago, ESED	WWF agrees with the Encouraging Sustainable Economic Development (ESED) designation for the oil and gas significant discovery licences. These licences are located primarily on land, as such, significantly reduce the development and operational risks to the marine environment and when appropriate mitigation measures are in place to limit the impacts to the terrestrial environment. But it is essential that appropriate measures are taken to protect the marine environment, as there will be considerable shipping activity associated with the development and operation of any of these licences.	General comment noted.
WWF-33	World Wildlife Fund	14/02/2014	Option and Recommendations		Archipelago	WWF does not agree that all of the marine waters of the Archipelago should be designated Mixed Use. Mixed Use permits all uses and does not identify the important wildlife habitat that is present in the Archipelago. WWF feels that it is a critical to take a more precautionary approach by identifying and designating important habitat now, before development pressures intensify.	The DNLUP has been revised to consider marine environments.
WWF-34	World Wildlife Fund	14/02/2014	Option and Recommendations		Archipelago	The Arctic Archipelago is region rich with natural capital: the sea ice ecosystem, wildlife and non-renewable resources (oil and gas). The Nunavut Land Use Plan must recognize the uniqueness, sensitivity and global importance of the Archipelago and through land use zoning set the course for responsible, sustainable development in the High Arctic. This will be in the long term interest of Nunavummiut and Canadians alike.	General comment noted. The Plan has been revised to incorporate information and data collected during the land use planning process. Decisions are made on the best available knowledge.
WWF-35	World Wildlife Fund	14/02/2014	Option and Recommendations		Archipelago	Recommended Option for Sea Ice Habitat of the Arctic Archipelago. Option 2 is recommended as it supports the Goal of Protecting and Sustaining the Environment: "Assign a designation that permits all activities but with seasonal geographic restrictions. For conforming and approved project proposals, provide a recommendation to regulators and proponents to consider potential impacts on wildlife and landscape values that must be considered outside of the seasonal restrictions." This option requires future research in the Arctic Archipelago to understand the multi-year sea ice ecosystems and prepare for future new activities. In particular, to develop appropriate mitigative measures for this High Arctic region, including seasonal and other restrictions. In light of the knowledge gaps that exist, a precautionary approach is required to ensure future options remain open. WWF strongly recommends that the research be undertaken in the near future and that scientific and traditional knowledge is collected. Furthermore, a precautionary approach helps to identify knowledge gaps and generate a shared incentive to address the gaps, since it holds out the possibility of relaxing restrictions once the area is better understood.	General comment noted. NPC is not a primary generator of research. The formulation of land use plans is mainly based on information provided by external experts.









