Kitikmeot Regional Wildlife Board
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Kitikmeot Nunaliit Avikhimaniani Angutikhaligiyit Katimayit

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June 22, 2015

Sharon Ehaloak, Executive Director
Nunavut Planning Commission
P.O. Box 2101
Cambridge Bay, NU X0B 0C0

Sent by email: sehaloak@nunavut.ca
fax: (867) 983-4626

Re: Technical Meeting Submission, Draft Nunavut Land Use Plan

Dear Ms. Ehaloak:

Please accept this correspondence as the written comments of the Kitikmeot Regional Wildlife Board (KRWB), submitted in preparation for the Technical Meeting on the *2014 Draft Nunavut Land Use Plan* developed by the Nunavut Planning Commission (NPC).

As mentioned in our June 1st, 2015 Application for Participant Standing, the issue of \ land use in barren-ground caribou calving grounds is the main concern of the KRWB. This is especially the case in the West Kitikmeot, as well as on the Boothia Peninsula—where muskox also congregate. The related matter of shipping and ice breaking in known areas of caribou sea ice crossings is likewise of particular interest. These issues are relevant to land use planning, given that Article 11 of the *Nunavut Land Claims Agreement*, which explicitly applies to both land and marine areas within the Nunavut Settlement Area, includes wildlife in its definition of “land”.

With this in mind, the KRWB submits the following comments on the NPC’s 2014 drafts of the Nunavut Land Use Plan (NLUP) and its companion Options and Recommendations (O&R) document.

Chapter 2 - Protecting and Sustaining the Environment

The KRWB was glad to see that caribou habitat and marine areas of importance are identified by the NPC as key considerations for the protection and conservation of

Nunavut's environment (O&R, p. 7), because these wildlife habitats are highly valued by Inuit harvesters of the Kitikmeot region. However, clarifications regarding the treatment of caribou calving grounds and sea ice crossings is warranted.

Caribou calving areas

While the NPC recognizes that "the relationship and historical dependence on caribou is a fundamental part of Inuit identity and a distinct feature of Inuit culture" (NLUP, p. 24), and acknowledges that "calving areas are widely recognized as being of critical importance for maintaining healthy caribou populations" (NLUP, p. 24), it only recommends protection for calving areas that have not been identified for high mineral potential (O&R, p. 42).

The KRWB would like to know how the NPC determined, on the basis of planning partner and community feedback, that the need for protection of calving areas lacking mineral potential was greater than that of calving areas with high mineral potential. In its support of the Kivalliq Wildlife Board's opposition to exploration on caribou calving and post-calving grounds, for instance, the KRWB made no distinction between the two—caribou make use of their calving grounds irrespective of what may lie beneath them.

The KRWB agrees with the NPC that the goal of protecting and sustaining the environment, including wildlife and wildlife habitat, is "of critical importance to the sustainability of Nunavut's communities, Inuit culture and the continuation of a viable long-term economy" (NLUP, p. 23). As such, the KRWB urges the NPC to regulate land uses in caribou calving grounds in accordance with the merit of the calving grounds to caribou, first and foremost.

Caribou sea ice crossings

The KRWB was pleased to note that the NPC stressed the importance of caribou migration routes, especially "for herds that migrate across the frozen sea ice each year to reach their calving grounds" (NLUP, p. 24), and highlighted their vulnerability to disturbance by ice breaking. The NPC further acknowledges that community concerns have been raised in relation to ice breaking in the Coronation Gulf (O&R, p. 43).

However, caribou sea ice crossings are given a Mixed Use designation, reportedly due to the limited information regarding the timing of caribou sea ice crossings. If that is the case, how does the NPC expect regulatory authorities to "mitigate impacts of project proposals with ship traffic on spring and fall caribou sea ice crossing" (O&R, p. 43), when and where appropriate? Also, since "all project proposals occurring in the Mixed Use Designation will be considered to conform to the Plan" (O&R, p. 46), how can the

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NPC effectively act upon its recognition of the vulnerability of migratory caribou herds to disturbance by ice breaking?

Chapter 4 - Building Healthier Communities

The KRWB notes that the NPC forecasts that "a growing number of goods, natural resources and tourists will navigate through the waters in the future" (NLUP, p. 34). In parallel, the NPC states that "as areas are identified as potential transportation corridors (surface and marine), they should be managed to ensure that this potential is not compromised" (NLUP, p. 34).

The KRWB already sees the potential disturbance of culturally significant sites by disembarking ship passengers as a cause for concern—mainly due to a lack of related monitoring. Accordingly, how can the NLUP contribute to ensuring that shipping activities do not negatively impact Inuit cultural heritage and/or take precedence over caribou migration routes?