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Qikiqtani Inuit Association

Jonathan Savoy
Senior Planner
Nunavut Planning Commission
P.O Box 2101, Cambridge Bay, NU, X0B 0C0

Re: QIA Comments on DNLUP 2014 for NPC Technical Meeting of June 23-26, 2015

Dear Mr. Savoy,

The Qikiqtani Inuit Association (QIA) has conducted a technical review of the Nunavut Planning Commissions (NPC) 2014 Draft Nunavut Land Use Plan. QIA is providing a joint set of technical comments along with Nunavut Tunngavik Incorporated (NTI) and the Regional Inuit Association (RIA), which will be presented at the Technical Meeting in Iqaluit June 23-26, 2015. The comments included in QIA's submission below are in addition to NTI's joint submission and are specific to QIA and Inuit of the Qikiqtani region. QIA's technical comments are chronologically ordered from the DNLUP 2014 for ease of reference.

I look forward to discussing our comments at the upcoming technical meeting.

Thank you,

Rosanne D'Orazio
Director, Lands & Resources
Qikiqtani Inuit Association

Technical Comments

QIA Comment #1: Incursions on Inuit Owned Land

Section 1.4.3 – Decision Making

NTI Bullet 16

Issue:

The process NPC has developed for consultation did not allow for Community members to identify uses and preferences on Inuit Owned Lands (IOL) during the community consultation process. A number of communities asked for a second viewing of the plan, as they felt the process to provide and receive feedback on their input was too quick. The designations applied in the DNLUP 2014 were not brought back to the community for verification and possible changes.

QIA's view is that more consultation on the question of the appropriate uses of IOL's is needed at the community level and regional level with QIA for all incursions on IOL. Consultations to date on the revised land use plan are not adequate, the core designations applied to IOL's were not presented to the community during the NPC's community consultation tour conducted in 2013 in the Qikiqtani region.

Recommendation:

QIA and NPC conduct additional consultation on core planning decisions in the DNLUP designations to take into account Inuit goals and objectives for each Inuit Owned Land Parcel in order to obtain their input and support on designations applied to Inuit Owned Lands.

QIA comment # 2: Key Migratory Bird Habitat Sites

Section 2.1.1 Key Migratory Bird Habitat Sites

NTI Bullet 20 & 21

Issue:

In developing the draft Nunavut Land Use Plan the NPC should uphold key process requirements or the spirit of the Nunavut Land Claims Agreement for establishing or enlarging Migratory Bird Sanctuaries, such as *the Inuit Impact and Benefit Umbrella Agreement for National Wildlife Areas and Migratory Bird Sanctuaries in the Nunavut Settlement Area* (IIBA). Several key bird habitat sites that are designated as protected areas under the revised DNLUP are not legislated key bird habitat areas under the *Migratory Birds Convention Act*. In addition to following the requirements under the IIBA process, the expansion of these protected areas requires additional consultation at the community level and regional level with QIA.

It is not clear from the NPC's consultation reports if Inuit agree with certain prohibitions that apply to protected areas for key bird habitat, such as road development, hydro-electric

development or mineral development. Additional consultation is required to determine if the expansion of key bird migratory habitats as a protected areas designation in the DNLUP conforms to Inuit goals and objectives for IOL.

The following Key Bird Habitat sites affect IOL's in the Qikiqtani Region:

Key Bird Habitat Incursions on QIA Inuit owned land

Name	DNLUP 2014 ID #
Eastern Jones Sound	32
Baillarge Bay	24
Great Plain of the Koukdjuak	36
Markham Bay	40
Fosheim Peninsula	34
East Axel Heiberg Islands	30
Western Cumberland Sound Archipelago	46
Buchan Gulf	26
Bylot Island Migratory Bird Sanctuary outside of National Park	67
Cape Searle/Reid Bay	27
Creswell Bay	29

Recommendation:

QIA and NPC conduct additional consultations on designations applied to IOL's for key bird habitat sites to determine Inuit goals and objectives for each Inuit Owned Lands.

QIA comment # 3: Caribou Protection

2.1.2 Caribou Habitat

Issue:

Full Protection: Core Calving Areas & Key Access Corridors

On January 1st, 2015 a moratorium on hunting caribou was announced in the Qikiqtani region. One of the goals of this moratorium is to protect the vulnerable tundra wintering caribou population on Baffin Island, a species which are important to Inuit culture and tradition. Caribou protection is of great importance to QIA and Inuit of the Qikiqtani region. Due to a lack of available scientific baseline data and Inuit Qaujimagatuqangit, information on caribou habitat, calving grounds, migration routes and post calving grounds are not included in the Revised Draft Nunavut Land Use Plan. It is QIA's view that as this information becomes available

it will be included in amended or subsequent versions of the NLUP in addition to the caribou protection measures as determine through the land use planning process.

In order to protect core calving grounds, it is QIA's position that all core caribou calving areas including areas with high mineral potential should be fully protected under the protected area designations (ID #47) in the NLUP. The recommendation to apply full protection to core calving areas aligns with the views of the Qikiqtaaluk Wildlife Board, which represent the hunters and trappers associations in the Qikiqtani region as well as the Government of Nunavut, the Nunavut Wildlife Management Board and the Kivalliq Wildlife Board. Any exploration or mining activity in a core calving ground would limit the ability to protect caribou within this area, therefore the application of mobile protection measures for core calving grounds would be insufficient due to the lack of baseline data, capacity and resources for monitoring and a lack of a system to implement such measures.

Mobile Protection Measures: Post Calving Areas

The Qikiqtani region lacks sufficient scientific data and Inuit Qaujimajatuqangit to delineate post-calving areas and the different behaviour and understanding of Baffin Island caribou. QIA supports the ongoing protection of caribou and the implementation of protection measures in post-calving areas when they are in the proximity of any activity that may disrupt their behavior such as, industrial, research or tourism. QIA is recommending that mobile protection measures be applied to post calving areas when caribou are present. Mobile measures travel with the caribou during their annual cycle so wherever the caribou are on the landscape they are protected. In order to implement mobile caribou protection measures mitigation must be developed specific to the herd and region as well as a monitoring plan to monitor caribou distribution and movement. QIA supports mobile protection measures but in order for them to be successful a robust monitoring plan with adequate capacity and resources must be available to implement such measures.