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June 22, 2015

Jonathan Savoy  
Senior Planner  
Nunavut Planning Commission  
PoBox 2101  
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Dear Mr. Savoy,

World Wildlife Fund Canada (WWF-Canada) would like to thank the Nunavut Planning Commission (NPC) for the opportunity to participate in the draft Nunavut Land Use Plan (NLUP) technical meeting and pre-hearing conference. Brandon Laforest, Senior Specialist Arctic Species and Ecosystems, and Rachel Theoret-Gosselin, Specialist Eastern Arctic, will be representing WWF-Canada at the technical meeting held in Iqaluit on June 23 to June 26, 2015.

We have reviewed the latest version of the draft NLUP along with the edited version of the Options and Recommendations for the draft NLUP received on June 5, 2015. We are pleased to see some of our previous concerns addressed in the draft NLUP, and commend the NPC for their work generating the current draft. However some of our concerns remain outstanding and some additional technical issues have been raised. Below we outline a list of concerns that we would like to discuss during the appropriate time at the technical meeting along with the corresponding sections from the draft NLUP:

1. The numbering in the Options and Recommendations document do not match with the map in Schedule A or the draft NLUP itself.
2. The use of a single colour designating all of the Special Management Areas (SMA) is confusing and not representative of the land use policies in each area. In particular, we feel that SMAs that are designated for Mineral Potential and Oil and Gas Potential should be a different colour than those designated for environmental protection, to facilitate a more accurate visual representation of the map.
3. The incremental nature of the plan is valuable, however it is unclear what would be the process for new information to be submitted to the NPC and how this information would be handled and incorporated to the NLUP (Section 1.4.1 and 1.4.5).
4. In the Protecting and Sustaining the Environment section, designations of some Sites of Ecological Importance are not achieving the NPC goal to maintain and restore the environment integrity. Protection measures should be strengthened for some Key Bird Habitat Sites, the Caribou Habitats, some Polar Bear Denning Areas and some Marine Areas of Importance (Section 2.1.1, 2.1.2, 2.1.3, and 2.1.5). We will present specific rationale for increased protection during the technical meeting for each of the above-mentioned sites.
5. For the Proposed National Marine Conservation Area (NMCA) in Lancaster Sound, commercial shipping impacts should be minimized and adequate directions to Regulatory Authorities should be clearly

formulated to mitigate potential impacts before the official establishment of the NMCA (Section 3.1.1.3).

6. Special Management Areas of Mineral Potential and of Oil and Gas Potential should not prohibit conservation based activities (Section 5.1.1 and 5.1.2). These areas are identified according to potential for resource exploitation and are not necessarily only suitable for natural resource extraction. Proper environmental and socio-economical assessment processes are already in place for the establishment of Conservation Areas and Parks and of tourism facilities. WWF-Canada believes that prohibition of these activities is not appropriate to achieve NPC goals to Encouraging Conservation Planning and to Encouraging Sustainable Economic Development.
7. The name of the SMAs designated for oil and gas (Map #168) is inconsistent in the different documents of the draft NLUP. The rationale presented in the draft NLUP discuss the potential for oil and gas exploitation in Nunavut, but the information on the map of Schedule A and in the description of the "considered information" in the Options and Recommendations refer only to sites containing Significant Discovery Licenses (Section 5.1.2). Hence it is unclear if the areas are only where there are Significant Discovery Licenses or if they are potential zones for oil and gas exploitation.
8. The amendment process does not lay a clear public consultation path. It is unclear if formal public consultation will be done or if NPC will announce publicly the amendment request and wait for public feedback. (Section 7.10)
9. The existing regional land use plans (*Keewatin Regional Land Use Plan* and *North Baffin Regional Land Use Plan*) were created after considerable public consultations. Variances from these existing regional land use plans should be noted and, where possible, explanations offered on the proposed variances.

On behalf of WWF-Canada, we would once again like to thank the NPC for granting us participation status in this process. We are looking forward to the productive discussions and the knowledge sharing that will arise through the technical meeting.

Sincerely,



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