



February 6, 2014

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

**RE: Submission to Draft Nunavut Land Use Plan**

Dear Sharon:

Thank you for the opportunity to submit comments on the Draft Nunavut Land Use Plan (DNLUP). The Chamber of Mines wishes to reinforce the importance of the land use planning process to economic development in Nunavut, and the critically important benefits that our industry can continue to bring to Nunavut and Nunavummiut.

The DNLUP is a “first generation plan” meaning that it is the foundational plan that further planning will build upon. As a first generation plan, it will be strengthened by recognizing that Nunavut is a vast, unpopulated area half the size of Europe with virtually no development. It will recognize that Nunavut’s comparative economic advantage lies in non-renewable resource development, and that geoscience data that might support development is sparse and far behind geoscience knowledge in established mining jurisdictions like Ontario and Quebec. In addition, the regulatory environment is robust, particularly so now that NUPPAA is in the final stages of being invoked. Creating a first stage plan under such conditions requires minimal permanent exclusion of land from development, and in fact should ensure the protection of non-renewable resource potential and access to it. Nunavut’s future economic success will very much depend on the DNLUP.

In the attached submission, we have outlined the key points of interest to the exploration and mining industry and have provided focussed recommendations to ensure that the interests of the mineral sector are properly reflected. On the whole, we believe the DNLUP as presented by the Nunavut Planning Commission provides a good basis for developing an all-inclusive strategy for land use in Nunavut. The DNLUP is not heavily prescriptive, compared to other jurisdictions, and it complements the regulatory process in the territory.

Respectfully, there remains a high level of uncertainty with the DNLUP as currently presented, particularly in Section 5.1 “Diversified Economic Development. The DNLUP acknowledges the importance of the mineral industry in the text of Section 5.1.1. However, these statements are not adequately or accurately represented on the land use maps in Schedule “A” or Schedule “B”. For example, the map in Schedule “A” details a small number of mineral/mining Projects as “Encouraging Sustainable Economic 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. It should also reflect the current levels of very low geoscience knowledge compared to other Canadian jurisdictions.

It is imperative that the DNLUP be clear and unequivocal in expressing the critical role that the responsible development of mineral resources must play to ensure the present and future socio-economic success of Nunavut and its citizens. We hope the attached detailed comments provide clarity to our specific concerns, and look forward to seeing these recommendations reflected in the next draft of the plan. Should you have any questions, please contact Elizabeth Kingston, General Manager – Nunavut, in our Iqaluit office at [generalmanagernu@miningnorth.com](mailto:generalmanagernu@miningnorth.com) or (867) 979-5291. Elizabeth has worked closely with a number of our members in the preparation of this submission.

Yours truly,

**NWT & Nunavut Chamber of Mines**



Brooke Clements  
President

c.c.: Honourable Peter Taptuna, Premier of Nunavut  
Honourable George Kuksuk, Minister of Mines and Minister of Economic Development & Transportation - Government of Nunavut  
Cathie Towtongie, President – Nunavut Tunngavik Incorporated  
Ian Gray, Regional Director General (Nunavut) - Aboriginal Affairs and Northern Development Canada  
Patrick Borbey, President - Canadian Northern Economic Development Agency