



## Beverly and Qamanirjuaq Caribou Management Board

14 February 2014

Sharon Ehaloak,  
Executive Director  
Nunavut Planning Commission

Via e-mail: [sehaloak@nunavut.ca](mailto:sehaloak@nunavut.ca)

Dear Ms. Ehaloak:

### **BQCMB Comments on Draft Nunavut Land Use Plan**

Thank you for providing the Beverly and Qamanirjuaq Caribou Management Board (BQCMB) with the opportunity to submit comments on the 2011/2012 Draft Nunavut Land Use Plan (Draft Plan). The BQCMB is glad to be able to continue to provide input about areas and issues related to caribou and to contribute to development of this land use plan, which is so crucial for the future of Nunavut.

The mandate of the BQCMB is to make recommendations for the conservation and management of the Beverly and Qamanirjuaq caribou herds and their habitats. This involves making recommendations about land use planning across the multi-jurisdictional caribou ranges, which includes portions of the Kivalliq and Kitikmeot regions of Nunavut.

### **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 free-ranging 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.***

More background on why these areas are so critically important to caribou and the BQCMB's long-standing position on this issue is attached (see Attachment A). The essential case for protection has been stated many times by the BQCMB as a whole and also by its individual members, as well as by many other caribou harvesters from dozens of communities in Nunavut and other jurisdictions, biologists, wildlife managers, academic scientists and others. I'm sure NPC staff and Commissioners have heard this message over and over again from people firsthand as well. I now paraphrase an explanation that has been stated quite simply and clearly to me as follows:

Protecting caribou calving and post-calving areas is not only a necessary requirement for maintaining healthy caribou herds, it is the right thing to do. How could it possibly be okay to plunder, disturb and damage a nursery?

***We urge NPC to do the right thing and ensure that long-term protection for caribou calving and post-calving areas is provided in the Nunavut Land Use Plan.***

#### **BQCMB Submissions on the Draft Nunavut Land Use Plan**

We are providing initial comments by your February deadline with the expectation that the BQCMB will be invited to meet with NPC staff in May 2014, as outlined in your guide for engagement document. However, because the BQCMB's spring 2014 regular board meeting will occur May 6-8th in Regina, we are hopeful that you or other NPC staff will be able to attend our meeting to present information on the Draft Plan and discuss the BQCMB's comments and recommendations for changes.

We may submit additional comments before your final April deadline. We anticipate this may be warranted given there is so much currently unknown to the BQCMB in terms of: a) information still to be provided to NPC by governments, b) input provided to the NPC by communities during recent consultation sessions in the Kivalliq and Kitikmeot regions and c) recommendations to be submitted by all other parties to your consultation process.

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

## **General Comments about the Draft Nunavut Land Use Plan**

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.

## **BQCMB Recommendations**

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.
- 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.
- 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.

More detailed comments and explanation of these recommendations are provided in Attachment B.

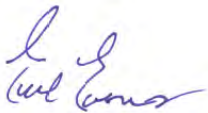
The need for effective land use planning for Nunavut has never been greater, given the growing pressures placed on the land, the potential for accelerating development activity and cumulative effects, and the increasing vulnerabilities of caribou and other wildlife species. Land use planning is the mandate of NPC, and it is clear that other Nunavut organizations are just as anxious as the BQCMB to benefit from guidance on land use decisions that should be provided by an effective land use plan (see Attachment C).

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 Metis Council, Lutsel K'e Dene First Nation.

If you have any questions about these comments, please contact the BQCMB's contract biologist Leslie Wakelyn ([wakelyn@theedge.ca](mailto:wakelyn@theedge.ca)) or BQCMB Executive Director Ross Thompson ([rossthompson@mymts.net](mailto:rossthompson@mymts.net)). Once again, I invite you and your staff to attend the BQCMB's spring meeting to discuss our input and the Commission's vision for Nunavut land use planning.

Sincerely,



Earl Evans  
BQCMB Chairperson

Attachments (4)

cc Alex Ishalook, BQCMB member (Kivalliq Wildlife Board) and Arviat HTO Chairperson  
Stanley Adjuk, BQCMB member (Kivalliq Wildlife Board) and Whale Cove HTO Chairperson  
Mitch Campbell, BQCMB member (Government of Nunavut) and Kivalliq Regional Biologist

## **Attachment A. Background for BQCMB Comments on the Draft Nunavut Land Use Plan**

### ***A. Position of the BQCMB***

From the BQCMB's position paper "Protecting Calving Grounds, Post-Calving Areas and Other Important Habitats for Beverly and Qamanirjuaq Caribou" (BQCMB 2004, p. 1), which has been provided previously to NPC:

"The BQCMB recognizes the importance of economic development, including resource development, to the communities on the Beverly and Qamanirjuaq caribou ranges. The BQCMB also recognizes that residents of these communities do not want to compromise healthy caribou herds for the economic benefits of non-renewable resource development. The preservation of caribou and their key habitats is essential both for the economic benefits they provide, and for maintaining traditional lifestyles.

The BQCMB believes that the Beverly and Qamanirjuaq caribou herds should be protected from any human-caused disturbance that has potential to cause significant adverse effects to these herds or key habitats across the caribou ranges. To this end, the BQCMB has consistently called for long-term protection of caribou calving grounds and post-calving areas, and stronger protection of the caribou herds and their habitat throughout all seasonal ranges."

The areas currently defined as the calving grounds of the Beverly and Qamanirjuaq herds are shown in Fig. 1.

### ***B. Identifying Areas of Important Caribou Habitat***

In the report "Protecting Beverly and Qamanirjuaq Caribou and Caribou Range" (BQCMB 1999), the BQCMB rated the calving period as having very high sensitivity to land use activities for both caribou and caribou range, and the post-calving period was rated with high sensitivity. Consequently, the Board's main recommendation in its 2004 position paper is for establishing legislated protected areas to provide long-term protection for caribou calving and post-calving areas.

The BQCMB (2004) describes the importance of the calving and post-calving areas as follows (p. 8):

"Caribou cows during calving and post-calving are both responsive to disturbance and highly vulnerable. Recent research has shown that the cows need uninterrupted foraging time to produce milk until calves become foragers at about 3 weeks after birth (Russell et al. 2002). This 3-week period is the time when calves are most sensitive to the maternal and environmental conditions that affect their growth, and when they are most vulnerable to predation. Cows and calves are also particularly vulnerable during calving and post-calving periods because they gather together in groups. It is therefore critical to avoid both disturbance of cows and calves during the calving and post-calving periods, and destruction of calving and post-calving habitats."

### ***C. Managing Land Use in Important Caribou Habitats, including Calving and Post-calving Areas***

In the position paper, the BQCMB recommends that "the following steps be taken to provide adequate protection for Beverly and Qamanirjuaq caribou over the long-term:

- 1) The traditional calving grounds and post-calving areas of these two caribou herds should be provided with long-term legislated protection that prohibits any type of activity that would cause serious or irreversible negative effects to caribou or habitat.



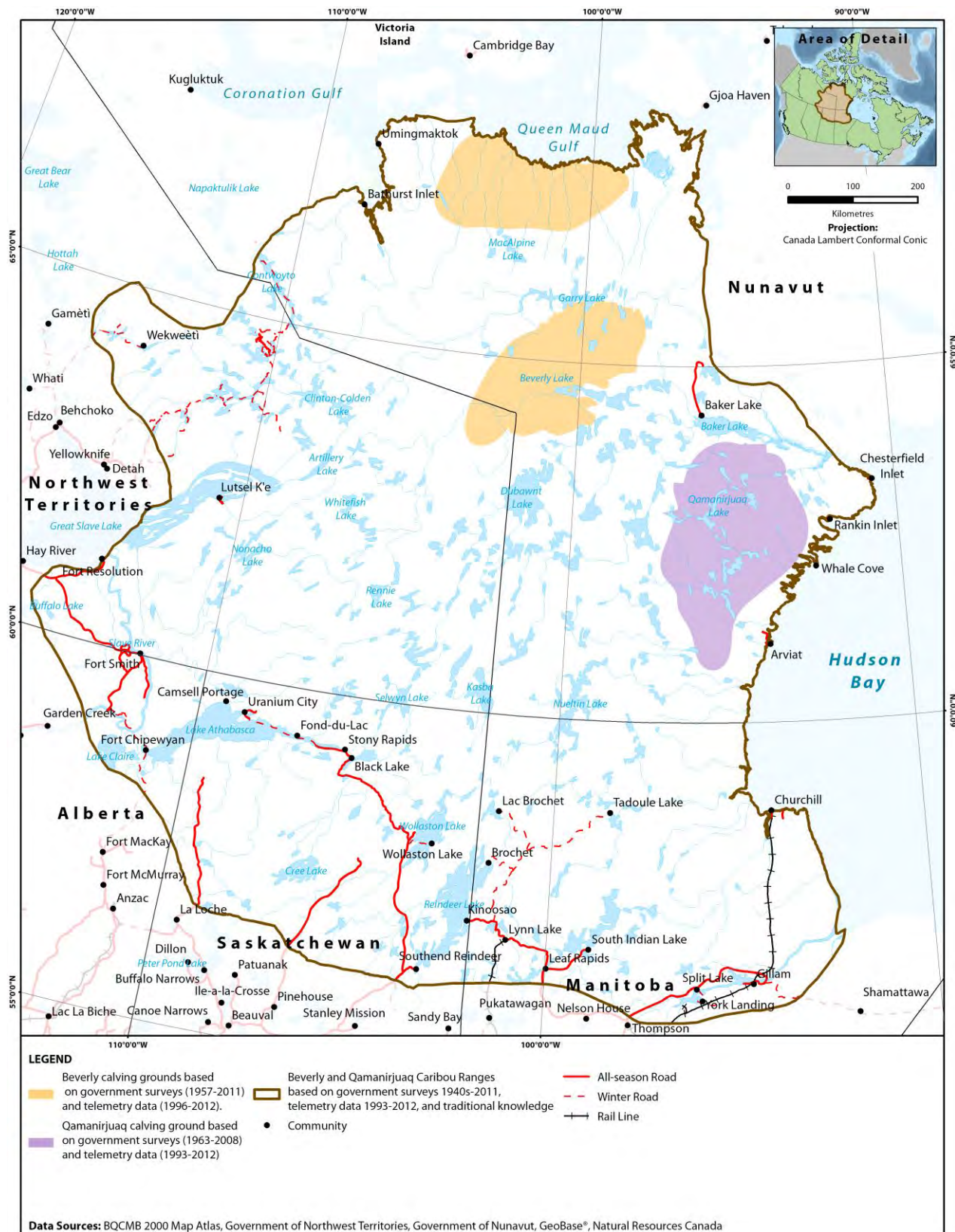


Fig. 1. Beverly and Qamanirjuaq caribou calving grounds based on information from telemetry and surveys collected between 1957 and 2012 (after BQCM 2000, Gunn and Sutherland 1997 and Nagy et al. 2011).

- 2) The herds should be protected during other key life cycle periods (i.e., fall migration/rut, winter, spring migration) and while at water crossings by means of improved Caribou Protection Measures (CPM). An assessment must first be conducted to determine if modifications to the original CPM can provide meaningful protection to these herds. Following an affirmative assessment and development of improved measures, they should be established as a conformity requirement of a revised land use plan for the Kivalliq region, and incorporated into other regional land use plans as they are developed.
- 3) Cumulative effects assessment/modeling through the environmental assessment process should be implemented to minimize destruction of all habitats used by Beverly and Qamanirjuaq caribou outside of traditional calving grounds and postcalving areas.
- 4) Regular delineation of calving grounds and post-calving areas should be undertaken.
- 5) A range-wide system of conservation planning should be established to safeguard the caribou herds over the long-term across all seasonal ranges.

The context for development of these recommendations in 2003-04 is summarized as follows:

“Current policies and measures are not adequate to ensure maintenance of the Beverly and Qamanirjuaq caribou herds in the face of increasing levels of human activity on the caribou ranges. The need for action is urgent in light of (i) the growing and diversifying demand for caribou, (ii) increasing development occurring across the caribou ranges, particularly on or near the traditional calving and post-calving areas, (iii) the lack of action taken to date by the responsible governments to implement long-term caribou protection, and (iv) our lack of knowledge concerning recent seasonal range use by the caribou herds. A system is needed that addresses the cumulative effects of changes occurring across the entire Beverly and Qamanirjuaq caribou ranges.” (BQCMB 2004, p. i)

### **The Current Situation**

None of the points outlined above has changed in the decade since this paper was written, except that our knowledge of recent seasonal range use (iv) has increased through the use of telemetry to track locations of collared caribou. A system for identifying, assessing and mitigating the cumulative effects of changes occurring across the caribou ranges has not yet been developed.

Since 2004 it has become clear that most of North America’s barren-ground caribou herds, including most herds in Nunavut, have declined recently. The reasons for protecting important caribou habitats from disturbance have increased, and the need for protection is even greater and more urgent than it was in 2004. In addition to protection of calving and post-calving areas, the need has increased for minimizing disturbance to caribou during other key periods, such as during migration and at water crossings. In addition, since 2004 formally-stated support for protection of calving grounds and post-calving areas has increased, with numerous organizations making resolutions and writing letters calling for protection of these areas. This includes Nunavut wildlife organizations and Aboriginal organizations that represent caribou harvesters outside Nunavut (see Attachment D for examples).

As a result of this situation, the BQCMB has developed additional recommendations regarding protection of both the caribou herds and their important habitats, which it has submitted to regulatory boards and governments. It has also increased its level of involvement in environmental assessments/reviews of mining activities proposed on the calving and post-calving areas and migration routes of the Beverly and Qamanirjuaq



herds. The BQCMB has also issued press releases urging governments and NWT and Nunavut organizations to protect the herds and their calving grounds (BQCMB 2008, 2009, 2012, 2013).

In addition to making recommendations specifically about protecting calving and post-calving areas, the BQCMB has recommended land use planning that provides meaningful protection for important caribou habitats. In addition, the Board has called for cumulative effects assessment and planning for disturbance thresholds/limits to protect caribou and their important habitats, and to allow for recovery of declining herds. Finally, the BQCMB urges governments, regulatory agencies and others to use a *precautionary approach* when making decisions that may affect caribou and important caribou habitats.

#### ***D. The Potential Role of Nunavut Land Use Planning in Caribou Conservation***

The BQCMB has described the need for range-wide conservation planning that recognizes important caribou habitats and the role of cumulative effects as follows:

“Caribou cows and calves are most vulnerable to human activities and habitat changes on calving grounds and postcalving areas, and therefore protection of these areas is essential. However, the interactions between the effects of changes that occur on all other seasonal ranges with the effects of changes that occur on calving grounds and post-calving areas must be taken into account, because changes that occur anywhere on a herd’s range ultimately affect the condition/health of cows and their calves. The cumulative effects from natural and human-caused changes across seasonal ranges set the context for the effects on any one seasonal range. The capability of caribou to buffer changes varies between seasonal ranges and between years, and therefore rangewide conservation planning for each herd is necessary.” (BQCMB 2004, p. 9)

The BQCMB also recommended that “Legally-binding and enforceable land use planning should be a key component of both rangewide conservation planning and a system for managing human land use activities on caribou ranges.” and makes specific recommendations for land use planning in the Kivalliq region of Nunavut that would “provide clearer direction and more current information for protecting Beverly and Qamanirjuaq caribou” (BQCMB 2004, p. 16).

#### **References**

BQCMB 1999. Protecting Beverly and Qamanirjuaq caribou and caribou range. Part I: Background information. Beverly and Qamanirjuaq Caribou Management Board, Ottawa ON. 40pp. Available on-line at: [www.arctic-caribou.com/bevreport.html](http://www.arctic-caribou.com/bevreport.html)

BQCMB 2000. Protecting Beverly and Qamanirjuaq caribou and caribou range. Part II: Map atlas and documentation. CD-ROM created for the BQCMB by Leslie A. Wakelyn and David E.C. Taylor, Yellowknife, NWT. Available on-line at: [www.arctic-caribou.com/parttwo/intro.html](http://www.arctic-caribou.com/parttwo/intro.html)

BQCMB 2004. Protecting calving grounds, post-calving areas and other important habitats for Beverly and Qamanirjuaq caribou: A position paper. Beverly and Qamanirjuaq Caribou Management Board, Stonewall MB. 26pp. Available on-line at: [www.arctic-caribou.com/PDF/Position\\_Paper.pdf](http://www.arctic-caribou.com/PDF/Position_Paper.pdf)

BQCMB 2008. Press release: With few caribou seen on Beverly calving ground recently, BQCMB calls for action to protect the herd. November 27, 2008, Stonewall MB.

BQCMB 2009. Press release: Continuing drop in caribou numbers makes a “Recipe for Recovery” to help the ailing Beverly herd more important than ever. July 6, 2009, Stonewall MB.

BQCMB 2012. Press release: BQCMB calls for halt to mineral exploration on caribou calving grounds and cancellation of permits for work this summer. June 12, 2012, Stonewall MB.

BQCMB 2013. Press release: Opposition to Anconia Victory Lake Project Grows. May 22, 2013, Stonewall MB. Available on-line at: <http://www.arctic-caribou.com/PDF/BQCMBNewsReleaseAnconiaVictoryLakeFINAL.pdf>

Gunn, A. and M. Sutherland. 1997. Surveys of the Beverly caribou calving grounds, 1957-1994. NWT RWED File Report No. 120. Dept. Resources, Wildlife, and Economic Development. 119pp. Available on-line at: [www.enr.gov.nt.ca/ live/documents/content/Beverly\\_caribou\\_calving.pdf](http://www.enr.gov.nt.ca/live/documents/content/Beverly_caribou_calving.pdf)

Nagy, J. A., D. L. Johnson, N. C. Larter, M. W. Campbell, A. E. Derocher, A. Kelly, M. Dumond, D. Allaire, and B. Croft. 2011. Subpopulation structure of caribou (*Rangifer tarandus* L.) in arctic and subarctic Canada. Ecological Applications [doi:10.1890/10-1410.1]

## **Attachment B. Comments and Recommendations for Revisions to Draft Nunavut Land Use Plan**

Comments and recommendations from the Beverly and Qamanirjuaq Caribou Management Board (BQCMB) are provided below about the existing content of the Draft Nunavut Land Use Plan (Draft Plan) and additional areas and issues that should be managed in the final Nunavut Land Use Plan. Background and supporting information are provided in Attachments A, C and D. A list of acronyms and abbreviations is provided at the end of this attachment (p. 20)

### **1) Caribou Habitat**

#### ***1.1 Calving Areas, Post-calving Areas and Water Crossings:***

##### ***a) Content of the Draft Plan and Options and Recommendations Document***

The Draft Plan notes that caribou herds are particularly vulnerable in areas where caribou herds calve, areas where they forage after calving (post-calving areas) and where they cross water bodies or sea ice. The Draft Plan (p. 17) states specifically that:

- “Calving areas are generally acknowledged as areas where caribou are particularly vulnerable to disturbance and the need for uninterrupted foraging is greatest.”
- “Post-calving areas are also important to the health of caribou, and in any given year, the post-calving area is likely to be within the historic calving area”.
- “Migration routes are important, especially at water crossings, which are often unique sites that offer relative ease of crossing.”

The Options and Recommendations document states: “The Keewatin Regional Land Use Plan prohibits development activities on all public lands and waters in caribou calving areas during calving season. Development should be restricted to avoid disturbing caribou.”

##### **BQCMB Comments:**

The BQCMB agrees that caribou calving areas, post-calving areas, and water crossings are important habitats, and has stated this repeatedly in various submissions to Nunavut DIOs, including NPC, and others<sup>1</sup>. Although it is true that some post-calving habitat is included within calving areas, in some years caribou move outside calving areas during the post-calving period, and are not always within “the historic calving area” during the post-calving period. We urge NPC to include management measures in the Nunavut Land Use Plan to protect calving areas, post-calving areas, and water crossings from negative effects of human land use activities.

Background information about the importance of these key caribou habitats and the need for protecting ***both these habitats and caribou while they are using these habitats*** is attached (Appendix A). Our recommendations concerning types and levels of protection and where these protective measures should be applied are provided below.

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<sup>1</sup> For instance see Attachment A and BQCMB 2004. Position Paper: Protecting Calving Grounds, Post-Calving Areas and Other Important Habitats for Beverly and Qamanirjuaq Caribou. 26pp.

**BQCMB Recommendation 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.

**b) Goals, Options and Recommendations in the Draft Nunavut Land Use Plan**

➤ *NPC Goal: Protecting and Sustaining the Environment (PSE)*

According to the NPC *“The goal of protecting and conserving Nunavut’s air, land and water, i.e. 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.”*

The PSE Land Use Designation, which has been assigned to caribou habitats, is intended “. . .to support environmental protection and management needs, including wildlife conservation, protection and management. . .” and “. . .discourage uses that may be incompatible with existing environmental uses or interests.”

**BQCMB Comment:**

The BQCMB agrees that this goal should be applied to protecting and conserving caribou and important caribou habitats, as they are critical to the sustainability of Nunavut’s communities, Inuit culture and the Nunavut economy.

➤ *NPC Options:*

Of four options considered, NPC recommends Option 1:

“Assign a designation that permits all uses. For conforming project proposals, provide a recommendation to regulators and proponents to consider potential impacts of projects on caribou calving, post-calving areas and migration routes.”

➤ *NPC Recommendation:*

PSE-R2: “Project Proposals located in historic caribou calving grounds should take into account impacts on caribou calving, post calving areas and migration routes.”

**BQCMB Interpretation:**

- “Assign a designation that permits all uses” - No land uses would be prohibited from occurring in any portion of any caribou calving area through direction of the land use plan.
- “consider potential impacts of projects” and “take into account impacts on caribou calving, post-calving areas and migration routes.” - No restrictions would be imposed by the land use plan on any activities and no requirements made for taking action to protect these habitats or caribou while they are using these habitats.
- “Project Proposals located in historic caribou calving grounds” - Impacts of project activities would be considered only within historic calving grounds, and not for projects in areas that caribou may use during calving and post-calving periods or during migration which are outside these areas.

**BQCMB Conclusion:**

PSE-R2 imposes no restrictions and therefore provides no assurance of protection for caribou or important habitats essential to healthy caribou herds from land use activities that can negatively impact caribou and habitats.

**BQCMB Comments:**

The management regime for caribou calving, post calving areas and migration routes as described by this option and recommendation is **not adequate** for reasons including those outlined below.

- **Does not address recommendations for protection** of caribou calving and post-calving areas made through resolutions and other statements to NPC and others by many Nunavut organizations (Kivalliq Wildlife Board, Kitikmeot Wildlife Board, Qikitarjuaq Wildlife Board, Arviat Hunters and Trappers Organization (HTO), Baker Lake HTO, Chesterfield Inlet HTO, Repulse Bay HTO, Whale Cove HTO) as well as other Aboriginal organizations (Athabasca Denesuline Né Né Land Corporation, Fort Smith Metis Council, Lutsel K'e Dene First Nation, Manitoba Denesuline, Northwest Territory Metis Nation), NWT Environment and Natural Resources, WWF-Canada and the BQCMB. See Attachment D for relevant documents available to the BQCMB at this time.
- **Does not fulfill NPC's stated objective** to: "Identify and provide protection for the natural environment, areas of biological importance and traditional land use activities. . ."
- **Does not fulfill NPC's stated goal** for the "Protecting and Sustaining the Environment" (PSE) land use designation (see above).
- **Provides no meaningful guidance** for regulatory authorities, Inuit organizations, municipalities or project proponents tasked with "considering" impacts on caribou calving, post calving areas and migration routes. At a minimum some prescriptive conditions are needed for regulators to assign to projects permitted in designated areas.
- **Provides no recommendations** for protecting post-calving habitat or caribou water crossings outside of calving grounds, or protecting caribou using these habitats outside of calving grounds.
- **Provides no additional protection** for caribou or guidance for land users and regulators beyond what is currently implemented through the NIRB's review processes and current regulatory authorizations.
- **Provides even less protection** for caribou and guidance for land users and regulators than what is currently implemented through AANDC's Caribou Protection Measures.
- **Does not provide clarity or definitions** for "historic caribou calving grounds", "post calving areas", "migration routes" or what is meant by "should take into account impacts".

**BQCMB Recommendations**

The management provided in the Nunavut Land Use Plan for land use in caribou calving, post calving areas and migration routes should be revised and improved.

**BQCMB Recommendation 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.

Allowed land use activities would be authorized by permits/licenses (for federal or Inuit owned land) applicable to non-traditional activities, with terms and conditions to be determined by the NIRB through its regular screening and review processes. There should be no exemptions from screening for non-traditional land use activities allowed in calving and post-calving areas due to the high sensitivity of these habitats and the high vulnerability of caribou to disturbance while using these areas, and particularly to cumulative impacts. Participation in screening and review processes and contributions from GN-DOE, AANDC and appropriate DIOs, including regional wildlife boards, should be encouraged by NPC in order to base decisions on the best available knowledge.

### **c) Defining Calving and Post-calving Areas**

From the BQCMB's perspective, there appears to be abundant support for "protection of calving and post-calving areas", both from Inuit caribou harvesters and from others who depend on caribou and are concerned about the long-term future of the caribou herds that use calving and post-calving habitats in Nunavut. (For examples see Attachment D.) For land use planning purposes, however, clarity on what is meant by "protection" and definitions of calving and post-calving areas is needed.

**The BQCMB provides four options for consideration** for defining calving and post-calving areas in the Nunavut land use plan.

- 1) Protect all "traditional calving and post-calving areas", defined as areas for which use by caribou for calving and post-calving has been documented.

*This is the long-held position of the BQCMB, which has been supported by others, including the Athabasca Denesuline and WWF-Canada.*

*The term "historic calving area" has been used in the Draft Plan by NPC, which possibly means the same as the BQCMB's "traditional calving area", but this is not clear.*

- 2) 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 by telemetry (collared cows) 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 telemetry and survey data every 5 years.

*For the Beverly and Qamanirjuaq herds in 2014, this would include: a) telemetry data collected since 1996 and 1993, respectively, b) results of calving ground surveys conducted in 1994 (both herds), 2008 (Qamanirjuaq) and 2011 (Beverly), and knowledge from nearby communities (e.g., Baker Lake, Arviat, Whale Cove, Rankin Inlet).*

- 3) Protect "recently used calving and post-calving areas" defined by systematic and defensible data analysis of locations of collared caribou tracked by telemetry during the last 20 years.

*For the Beverly and Qamanirjuaq herds, this would be based on analysis of telemetry data collected since 1996 and 1993, respectively.*



- 4) Protect a portion of areas used by collared caribou during the calving and post-calving periods in the last 20 years that is based on systematic and defensible data analysis and which targets inclusion of all areas most intensively used by caribou.

*For the Beverly and Qamanirjuaq herds, this would be based on analysis of telemetry data collected since 1996 and 1993, respectively, likely identifying “core” calving and post-calving areas.*

**BQCMB Recommendation 3:**

The BQCMB recommends Option 2, as it **will provide the best representation of habitats used by caribou for calving and post-calving based on the most comprehensive use of all available information.**

**Option 1 would be the preferred choice under ideal circumstances**, as it is the best option for application of the precautionary principle and would provide maximum flexibility for caribou herds to expand back into areas not recently used during calving and post-calving periods. The BQCMB’s map showing Beverly and Qamanirjuaq calving grounds, which is based on all calving surveys (1957-2011) and telemetry data (1993-2012), is provided in Appendix A (Fig. 1). However, **for several reasons related to data quality, comparability and lack of availability of information on historic post-calving areas, option 1 is currently not feasible.**

Option 3 is not the BQCMB’s first choice, as it may exclude important habitat identified through rigorous calving ground surveys to have been used by calving caribou in recent years. These areas may contain important habitats that may be used again if they are protected from negative impacts of commercial land use.

Option 4 is not recommended by the BQCMB, as it will exclude important habitats known to have been used by caribou for calving in recent years that require protection from negative impacts of commercial land use.

***d) Developing a Process for Resolving Conflicting Views***

**BQCMB Comment**

The BQCMB is aware that there will be conflicts among parties in a number of areas, with some particularly difficult issues concerning protection of important caribou habitat from damage and caribou from disturbance. Evidence that other parties have been concerned about resolution of these issues, specifically including land use in calving grounds, has been made public through the following documents posted on NPC’s website:

- From September 2013 NPC workshop report (bolding added):  
“NPC considers it critical that community values are clearly understood and effectively reflected in the NLUP. Partners recognized and agreed with this principle but were **unclear about how conflicting interests and values would be resolved by the NPC. Caribou calving grounds were discussed at length in this context.** GN agreed to provide all relevant calving ground data and information to NPC as soon as possible.

NPC staff emphasized the desirability of the partners resolving conflicting interests and values the issues among themselves before the public hearing.”

- From January 2014 NTI letter to NPC:  
“The draft TORs indicate that the purpose of the SMP [structured decision-making process] is to try to achieve consensus on difficult issues, particularly in cases **where government or DIO priorities are in apparent conflict with community priorities. Decisions regarding the approach to land use and development in caribou calving grounds are provided as an example.**”

**BQCMB Recommendation 4:**

If the NPC is unable to implement the land use management recommendations of the BQCMB, Kivalliq HTOs and Nunavut Regional Wildlife Boards, the 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.

This process could include a meeting to discuss management of land use activities in calving and post-calving areas and water crossings and related caribou management issues, involving all relevant parties including the NPC, the NIRB, the GN-DOE, KIA/NTI, the regional wildlife boards, the HTOs, AANDC and the BQCMB.

***e) Water crossings***

**BQCMB Comment**

The importance of key water crossings to caribou during migration is mentioned in the Draft Plan, but no management action is recommended to protect the habitat around these crossings or protect caribou while they are using these areas.

**BQCMB Recommendation 5:**

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

NPC should update the list of designated crossings. NPC should also determine, in consultation with GN-DOE, if the dates outlined in the Caribou Protection Measures (May 15<sup>th</sup> - September 1<sup>st</sup>) should be adapted or modified, and if one period can be applied to all crossings or if regional variations are more appropriate.

***1.2 Other Seasonal Ranges***

**BQCMB Comment**

The Draft Plan does not consider or make recommendations for protecting caribou from disturbance related to commercial development activities on other caribou ranges, including: summer, rut, winter and spring and fall migration routes. There is no reference to Caribou Protection Measures, which were included in the Keewatin Regional Land Use Plan (see 5a below for more info).

**BQCMB Recommendation 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.

**2) Chapter 3 - Goal: Encouraging Conservation Planning (ECP)**

The Draft Plan includes the following

- Thelon Wildlife Sanctuary (ECP-1) “Assign a designation that permits tourism, recreation and research and prohibits all other uses”
- Queen Maud Gulf Migratory Bird Sanctuary (ECP-2) - “Assign a designation that permits tourism, recreation and research.”
- Heritage Rivers (Thelon and Kazan) - (ECP-R1) “Project proposals located in and/or near a Heritage River should take into account the guidelines and criteria contained in the Heritage River’s management plan.”

**BQCMB Comment**

These conservation areas all contain important caribou habitat, including calving and post-calving habitat and key water crossings. The BQCMB supports NPC’s recommended management Option 1 for Thelon Wildlife Sanctuary, and believes the same management option should be applied to the Queen Maud Gulf Migratory Bird Sanctuary and the Thelon and Kazan Heritage Rivers.

**BQCMB Recommendation 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.

**3) Cumulative Impacts**

NPC’s role regarding cumulative impacts is described as being limited to making referrals to NIRB for screening projects which are normally exempt, in cases where NPC has identified “concerns with respect to the Cumulative Impacts of a Project Proposal in relation to other development activities.” The report on the NPC’s September 2013 workshop states:

“NPC staff then led a discussion on the issue of cumulative effects referrals, outlining the referral process and its limitations. NPC has developed a draft directive which has been circulated for comment. It is also developing with NWB and NIRB a reference map which would be linked to the directive and updated continuously. The map should be ready by April 2014. The NPC and its partners would welcome any and all relevant information and data for incorporation in the map. Discussion ensued about the challenges of managing cumulative effects, particularly where regulatory triggers are absent as in the case of low-level flights and some tourism activities.”

### **BQCMB Comment**

The BQCMB has not had access to the Cumulative Impacts Referral Directive document and Reference map. It remains unclear what process will be used in Nunavut for identification, assessment, monitoring and mitigation of cumulative effects and which roles will be collaborative among Nunavut and federal organizations, including NPC, NIRB and the Nunavut General Monitoring Program conducted by AANDC. It is difficult to comment on this process given the lack of information available.

### **BQCMB Recommendation 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. The Cumulative Impacts Referral Directive document and Reference map should be provided to all parties in the land use planning consultation process.

### **4) Transboundary Considerations**

NPC is required under the Nunavut Land Claims Agreement (Articles 40.4.8 and 40.5.7) to consult with the Manitoba and Athabasca Denesuline about the NLUP “respecting their interests in areas they have traditionally used and continue to use”. This meeting has been scheduled for late April in Thompson Manitoba.

### **BQCMB Comments**

This is a positive step, although it is unclear how the Manitoba and Athabasca Denesuline will be able to influence land use planning for many critical caribou-related issues, especially protection of calving and post-calving areas, about which both organizations have indicated strong concerns (see Attachment D).

In addition, there is no description in the Draft Plan of any means for considering the interests of other traditional caribou harvesters and organizations who represent them (such as the Lutsel K’e Dene First Nation and the Northwest Territory Metis Nation) who harvest caribou herds which spend part of each year in Nunavut, including the calving and post-calving periods (such as the Beverly, Qamanirjuaq and Bathurst herds). It is clear that land use decisions in Nunavut may affect the livelihoods and culture of these harvesters if these decisions result in long-term negative effects on the caribou herds which range across jurisdictions.

The Draft Plan states (p. 18) that NPC must “take into account federal, territorial, international and inter-jurisdictional land, water, and wildlife management agreements and plans which have been approved by Government, Inuit, the NWMB, the NIRB or the NWB.” It is unclear how NPC will consider or take action regarding the new Beverly and Qamanirjuaq Caribou Management Plan for 2013-2022, which provides the BQCMB with direction for considering the potential effects of commercial land use activities on caribou habitat and conservation of the herds, includes a focus on maintaining availability of important habitats and recommends land use management actions to protect caribou and key habitats.

It is also unclear how the Plan will consider or collaborate with the ongoing Bathurst Range Planning program, which has been initiated by the Government of the Northwest Territories as a collaborative planning process with numerous parties including the mining industry. Because of the overlap in some seasonal ranges of the

Bathurst and Beverly herds, and the multi-jurisdictional nature of these ranges, this program should be included as one of NPC's "transboundary considerations".

**BQCMB Recommendation 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. This includes parties for which consultation by NPC is directed by the Nunavut Land Claims Agreement (Manitoba and Athabasca Denesuline) and others (such as the Lutsel K'e Dene First Nation and the Northwest Territory Metis Nation).

**5) Key elements of the Keewatin Regional Land Use Plan (KRLUP 2000) not carried forward into the Draft Nunavut Land Use Plan**

Following are key directions of relevance to the BQCMB that were provided by the KRLUP but do not appear to have been considered during development of the Draft Plan.

**a) Restrictions to land use activities**

➤ **KRLUP Action 2.6** (p. 52) states:

"Development activities shall be prohibited on all public lands and waters within all caribou calving areas during calving season and within caribou water crossings in the Keewatin, in accordance with the terms of DIAND caribou protection measures contained in Appendix H. Development activities shall be prohibited on IOL within all caribou calving areas during calving season and within caribou water crossings in the Keewatin, in accordance with the KIA caribou protection measures (an example of which is contained in Appendix H). These measures shall be enforced throughout the region by DIAND, KIA and DSD, to the full extent of their respective jurisdictions."

➤ The "Code of Good Conduct for Land Users" (Appendix G, p. 98) includes the following:

"3. Generally, low-level flights by aircraft at less than 300 metres should not occur where they will disturb wildlife or people. If such flights are necessary, they should only take place after consultation with the appropriate communities. All land users are responsible for reporting to the land managers any illegal or questionable low-level flight."

"7. During the caribou calving, post-calving and migrating seasons, land use activities should be restricted to avoid disturbing caribou, in general, and activities will be governed more specifically by caribou protection measures such as those contained in Appendix H."

**BQCMB Recommendation 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.

## b) Uranium mining

➤ **KRLUP Action 3.6** (p. 61) states:

“Any future proposal to mine uranium must be approved by the people of the region.”

### **BQCMB Comments**

The BQCMB notes that during the NIRB’s pre-hearing conference for AREVA’s proposed Kiggavik uranium mine in June 2013, the Baker Lake Hunters and Trappers Organization, the Mayor of Baker Lake and several community members called for a public vote to be held on the Kiggavik proposal. At other times during the review, Nunavummiut Makitagunarningit has called for a public vote to be held on questions related to uranium mining. Clearly, these individuals and institutions still believe that uranium mining should only take place in the Kivalliq with the support of the people of the region. Carrying section 3.6 forward into the Nunavut Land Use Plan would be consistent with the Government of Nunavut’s uranium policy<sup>2</sup> which states that the GN will support uranium mining subject to principles that include, “Uranium exploration and mining must have the support of Nunavummiut, with particular emphasis on communities close to uranium development.”

### **BQCMB Recommendation 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.

### **List of Acronyms**

AANDC	Aboriginal Affairs and Northern Development Canada (formerly known as DIAND)
BQCMB	Beverly and Qamanirjuaq Caribou Management Board
DIAND	Department of Indian Affairs and Northern Development (now AANDC)
DIO	Designated Inuit Organization
DSD	Department of Sustainable Development (now GN-DOE)
DOE	Department of Environment
GN	Government of Nunavut
HTO	Hunters and Trappers Organization
IQ	Inuit Qaujimajatuqangit
KIA	Kivalliq Inuit Association
KRLUP	Keewatin Regional Land Use Plan
NIRB	Nunavut Impact Review Board
NLCA	Nunavut Land Claims Agreement
NLUP	Nunavut Land Use Plan
NPC	Nunavut Planning Commission
NTI	Nunavut Tunngavik Incorporated
NWB	Nunavut Water Board

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<sup>2</sup> <http://www.uranium.gov.nu.ca/>



### **Attachment C. Role of the Nunavut Land Use Plan for Managing Caribou Habitat in Nunavut**

In the absence of protection for caribou calving areas through land use planning, the Nunavut Impact Review Board has been managing land use in caribou habitat through the screening of exploration proposals. However, the Nunavut Impact Review Board's narrow terms of reference means it is unable to make necessary management decisions to protect the long-term viability of Nunavut's caribou herds. This was made very clear during the screening of Anconia Resources Corp.'s exploration project near Victory Lake (NIRB FILE NO: 11EN046).

The NIRB approved Anconia's project proposal despite the BQCMB's recommendation that it be rejected because it lies in the heart of the Qamanirjuaq herd's calving grounds. The BQCMB then requested that NIRB "commit to making no further decisions allowing processing of applications for Inuit land use licenses or federal land use permits for activities on the Beverly or Qamanirjuaq calving grounds without at least conducting a Part 5 or 6 review"<sup>3</sup>. The BQCMB is of the opinion that this commitment would have been the bare minimum necessary to protect the long-term viability of the Qamanirjuaq caribou herd.

The NIRB responded that land use decisions of this sort would be inappropriate for the NIRB to make, given its strict mandate under the Nunavut Land Claims Agreement. Further, the NIRB suggested that the NPC would be the most appropriate institution to make these type of management decisions and stated (bolding added):

"...the NIRB has no jurisdiction to limit our discretion when conducting screening for all future project proposals in this manner. The NIRB's mandate under the NLCA clearly requires the NIRB to conduct a thorough and project-specific screening assessment on an individual basis of the project proposals as they are referred to the Board for screening. Each project proposal must, without limitation, be assessed by the Board on its own merits and the NIRB cannot predetermine the outcome of an individual screening by setting in place a general policy such as that suggested by BQCMB."<sup>4</sup>

"Addressing the broader issue of the appropriateness of development in the traditional calving areas of the Beverly and Qamanirjuaq caribou herds in the Kivalliq Region is within the purview of land use planning and land use permitting authorities. At present, the applicable **Keewatin Regional Land Use Plan as administered by the Nunavut Planning Commission has no prohibition on mineral prospecting, exploration or development in the Kivalliq region**. Accordingly, it would be wholly inappropriate and beyond the NIRB's jurisdiction for the NIRB to introduce, by way of project-specific review, a mechanism that would function as a form of general land use prohibition in this region. The NIRB has, however, continued to bring forward recommendations to land use planning and land use permitting authorities regarding the need to identify and mitigate potential cumulative effects of human land use activities on barren-ground caribou at a regional scale through development of an

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<sup>3</sup> BQCMB Letter to NIRB "Issuance of Land Use Permits on the Beverly and Qamanirjuaq Caribou Calving Grounds". May 31, 2012. [<http://ftp.nirb.ca/01-SCREENINGS/COMPLETED%20SCREENINGS/2012/11EN046-Anconia%20Resources-Marce%20Claims/06-FOLLOW-UP/120601-11EN046-BQCMB%20Ltr%20NIRB%20re%20Decision-IT6E.pdf>]

<sup>4</sup> NIRB Letter to BQCMB "Mineral Exploration in the Kivalliq Region and NIRB Screening of Anconia Resources Corp.'s 'Victory Lake' Project Proposal". June 9, 2012. [<http://ftp.nirb.ca/01-SCREENINGS/COMPLETED%20SCREENINGS/2012/11EN046-Anconia%20Resources-Marce%20Claims/06-FOLLOW-UP/120609-11EN046-NIRB%20Ltr%20to%20BQCMB%20Re%20Concerns-OEDE.pdf>]

action plan, updating of the CPM, and through the NPC's development of a Nunavut-wide land use plan."

The statement in bold above is in fact inconsistent with the Keewatin Regional Land Use Plan, which is the plan currently in effect in the Kivalliq region. Action 2.6 of that Plan (p. 52) states:

"Development activities shall be prohibited on all public lands and waters within all caribou calving areas during calving season and within caribou water crossings in the Keewatin, in accordance with the terms of DIAND caribou protection measures . . ."

The BQCMB notes that the NIRB included the following statement in its screening decisions for Anconia's Victory Lake proposal<sup>5</sup> and Iron Ore's Maguse River proposal [NIRB File No.: 11EN031]<sup>6</sup> (bolding added).

"The Nunavut Planning Commission should be aware of the ongoing concerns regarding a lack of protection for caribou and caribou habitat within the Kivalliq region of Nunavut. In developing a Nunavut-wide land use plan, **the NPC may wish to consider formalized protection of important caribou habitat, and seasonal restrictions on exploration activities in these areas to minimize disturbance to caribou** lifestyles."

The BQCMB also notes that land use decisions regarding caribou calving grounds are currently being made through the NIRB *screening* process. NIRB screenings do not involve community hearings or meetings, and community input is sought by circulating exploration proposals to community organizations. However, these are technical documents and are generally not available in Inuktitut (the language in which many Hunters and Trappers Organizations and Hamlet Councils continue to operate in Nunavut). Further, the time-frame for NIRB screenings is usually quite brief, making it difficult for institutions that only meet monthly to provide timely and informed comments on proposals. As such, the current practice of managing land use in caribou habitat through NIRB screenings provides a very limited opportunity for input and participation by community organizations and Nunavummiut at large.

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.

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<sup>5</sup> <http://ftp.nirb.ca/01-SCREENINGS/COMPLETED%20SCREENINGS/2012/11EN046-Anconia%20Resources-Marce%20Claims/03-DECISION/120305-11EN046-Screening%20Decision%20Report-OT6E.pdf>

<sup>6</sup> <http://ftp.nirb.ca/01-SCREENINGS/COMPLETED%20SCREENINGS/2011/11EN031-IronOne%20Inc-Maguse%20River%20Project/03-DECISION/110713-11EN031-Screening%20Decision%20Report-FT6E.pdf>

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

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- 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 Metis Council
  - 11) Lutsel K'e Dene First Nation



## KIVALLIQ WILDLIFE BOARD

Percy Kabloona, Acting Chairperson  
Nunavut Planning Commission  
P.O Box 2101  
Cambridge Bay, Nunavut  
X0B 0C0  
Email: [sehaloak@nunavut.ca](mailto:sehaloak@nunavut.ca)

Wednesday, January 22, 2014

**Re: Protecting Caribou in Nunavut – Nunavut Land Use Planning**

Mr. Kabloona;

Firstly, thank you for including Kivalliq Wildlife Board in your distribution list in the letters between Athabasca Denesuline Negotiation Team and Nunavut Planning Commission.

The Kivalliq Wildlife Board has been presented information from other RWOs, and the Department of Environment that caribou 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 protection of caribou calving and post-calving grounds are very crucial to the population of barren land caribou in the Kivalliq and Nunavut region from development and exploration. Inuit knowledge and scientific knowledge combined indicate that disturbance of caribou calving and post calving grounds and range from development/exploration activity may cause detrimental and long term impacts to caribou populations.

Kivalliq Wildlife Board is in support of Athabasca Denesuline Negotiation Team in protecting the habitat of caribou calving and post-calving grounds in all territories and provinces in which they roam. Two resolutions were passed in the Kivalliq Wildlife Board; a resolution in KWB's February 19-21, 2013 regular meeting and one more in KWB's Annual General Meeting dated October 28-31, 2013. Both resolutions were passed unanimously.

On behalf of the Kivalliq Wildlife Board, I urge Nunavut Planning Commission to include protection of caribou range and habitat in the upcoming Nunavut Land Use Plan. The Kivalliq Wildlife Board and Kivalliq HTOs would also like to be included in reviewing the Final Land Use Plan to ensure protection of wildlife.

If you have any questions, concerns or comments, please contact Leah M. Muckpah, Acting Liaison for Kivalliq Wildlife Board at [kwb@niws.ca](mailto:kwb@niws.ca); or myself, Chairperson of Kivalliq Wildlife Board at [rosstatty@gmail.com](mailto:rosstatty@gmail.com)

Sincerely;

  
Ross Tatty

Kivalliq Wildlife Board Chairperson





## KIVALLIQ WILDLIFE BOARD

**NPC**

**Re: Protecting Caribou in Nunavut – Nunavut Land Use Planning**

**Distribution List:**

Chief Earl Lidguerre, Fon du Lac Denesuline First Nation  
Chief Rick Robillard, Black Lake Denesuline First Nation  
Chief Bart Tsannie, Hatchet Lake Denesuline First Nation  
Honorable Johnny Mike, Minister of Environment, Government of Nunavut  
Honorable George Kuksuk, Minister of Economic Development and Transportation, GN  
Honorable J. Michael Miltenberger, Minister of Environment and Natural Resources, GNWT  
Drikus Gissing, Wildlife Director, GN DOE  
Lynda Yonge, Director of Wildlife, GNWT-ENR  
Mitch Campbell, Kivalliq Regional Biologist, GN DOE  
Elizabeth Copland, Chairperson, Nunavut Impact Review Board  
Ben Kovic, Chairperson, Nunavut Wildlife Management Board  
Gabriel Nirlungayuk, Wildlife Manager, Nunavut Tunngavik Incorporated  
David Ningeongan, President, Kivalliq Inuit Association  
Charlie Evalik, President, Kitikmeot Inuit Association  
Attima Hadlari, Chairperson, Kitikmeot Regional Wildlife Board  
James Qillat, Chairperson, Qikiqtaaluk Wildlife Board  
Alain Grenier, Acting Regional Director General, AANDC Nunavut Regional Office  
Jeff Mercer, Manager of Land Administration, AANDC Nunavut Regional Office  
Alex Ishalook, BQCMB Member (Kivalliq Wildlife Board) and Chairperson, Arviat HTO  
Stanley Adjuk, BQCMB Member (Kivalliq Wildlife Board) and Chairperson, Whale Cove HTO  
Earl Evans, Chairperson, Beverly and Qamanirjuaq Caribou Management Board  
Connie Cheecham, coordinator, Athabasca Denesuline Negotiation Team  
Kivalliq HTOs: Arviat, Whale Cove, Rankin Inlet, Chesterfield Inlet, Baker Lake, Repulse Bay, Coral Harbour



Attima Hadlari  
Chairperson





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Nunavut Impact Review Board

File No: 11EN046

KIA File No. KVL311C03

Friday, January-20-12

**NIRB:**

Arviat HTO board of directors have reviewed the NIRB file numbered 11EN046 with a motion from Baker Lake HTO, and a recommendation letter from the Beverly and Qamanirjuaq Caribou Management Board in a regular meeting scheduled January 19, 2012.

Arviat HTO is concerned the proposed project will disturb the Qamanirjuaq caribou herd and its calving/migratory route. Arviat HTO does not agree with permitting exploration activities on the calving and post-calving area, and recommends Anconia's application not be approved.

Moved by: Laurent Angalik

Seconded by: Paul Kattau

**MOTION 12/04/120 – CARRIED –**

If you have any questions, concerns or comments, please contact the Arviat HTO office.

Signed;

Alex Ishalook

Arviat HTO Chairperson

CC:

- BQCMB, Ross Thompson

Email: [rossthompson@mymts.net](mailto:rossthompson@mymts.net)

- Baker Lake HTO

Fax: (867) 793-2034





**David Vetra, Regional Manager of Department of Environment, Government of Nunavut**  
**Peter Kusugak, Acting Chairperson of Nunavut Wildlife Management Board**  
**Earl Evans, Chairperson of Beverly and Qamanirjuaq Caribou Management Board**  
**Gabriel Nirlungayuk, Wildlife Manager, Nunavut Tunngavik Incorporated**  
**Elizabeth Copland, Chairperson of Nunavut Impact Review Board**



## AQIGIQ HUNTERS & TRAPPERS ORGANIZATION

Nunavut Impact Review Board  
File No: 11EN046  
KIA No: KVL311C03

February 13, 2013

**RE: Victory Lake Project:**

Aqigiq HTO board of directors discussed the Anconia Resource request for support on exploration and mining in Victory Lake at their regular meeting February 12, 2013. In 1978 Caribou Protected Measures were established under the Territorial Land Use Regulations to protect caribou from disturbance in calving and post-calving areas, at designated water crossings and on migration routes to the calving grounds.

Moved by: Jacinthe Amarok  
Seconded by: Larry Tautu

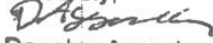
That Aqigiq HTO directors do not agree nor support the project since it will disturb the Qamanirjuaq Caribou herd and its calving & migrating route also any exploration activities.

To protect the herd Aqigiq HTO is opposing Anconia's Victory Lake Project based on BQMBs recommendation and tradition post-calving grounds since early 1950s.

Carried  
Motion # 106\13

If you have any questions or concerns, please contact our office anytime Mon-Fri before 5pm.

Sincerely,

  
Douglas Aggark  
Vice Chairman

Cc: Anconia Resource  
KWB, Ross Tatty  
Dept. of Environment, James Arreak  
BQMB, Ross Thompson  
Kivalliq HTOs  
NTI, Bert Dean  
KIA, David Ningeogan  
NIWS, Janet Dionne

P.O. Box 94, Chesterfield Inlet, Nunavut X0C 0B0  
Telephone (867) 898 9063 Fax (867) 898 9079





Arviq H.T.O.  
P.O. Box 39  
Repulse Bay, NU  
X0C 0H0  
Phone / ᐅᐃᐅᐅᐅᐅᐅᐅᐅᐅ  
Fax / ᐅᐃᐅᐅᐅᐅᐅᐅᐅᐅᐅ  
E-mail / ᐅᐃᐅᐅᐅᐅᐅᐅᐅᐅᐅ

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X0C 0H0  
(867)462-4334  
(867)462-4335  
repulsebayhto@hotmail.ca

Mrs. Joan Scottie  
Baker Lake  
Hunters & Trappers Organization  
P.O. Box 255  
Baker Lake, NU  
X0C 0A0

November 20, 2013

Dear Mrs. Scottie

It is our pleasure to write a letter of support for the resolution Baker Lake HTO board of Directors made for protection of caribou calving ground.

Arviq HTO board of Directors fully support your letter of request wanting our support to sustain the inland culture and lifestyle in Baker Lake.  
We also opposed any mining exploration in or near in preserving caribou calving ground.

Your letter of request was seen and decided to be support during our regular meeting on November 19, 2103 motioned # 471-11/13 by Remi Angotialuk, Director seconded by Mary Tuktudjuk, Sec. Treas..  
Any protection that helps our Territory to succeed in anyway in this situation our culture  
We will put an act to support to carry on our IQ.

We apologize for any hold back we may cause.

Sincerely,

Michel Akkuardjuk  
Chairperson of Arviq  
Hunters & Trappers Organization

Cc: Kivalliq Wildlife Board  
Nunavut Wildlife Management Board



**Issatik Hunters & Trappers Organization**

**P.O. Box 119  
Whale Cove, NU  
X0C-0J0**

**Phone (867)896-9944**

**Fax (867)896-9143**

**whalecovehto@qiniq.com**

**Anconia Resources**

**65 Front Street East**

**Suite 200**

**Toronto, Ontario**

**Phone: (416)815-9777**

**E-mail: [lockettda@telus.net](mailto:lockettda@telus.net)**

**Thursday, February 28, 2013**

**Anconia Resources;**

The Whale Cove HTO (Hunters and Trappers Organization) board of directors held a meeting dated Tuesday, January 29<sup>th</sup>, 2013 and discussed a request for support for exploration and possible mining and development activities in the Victory Lake area.

The Whale Cove HTO does not agree with permitting exploration and/or development activities on the calving and post-calving grounds of the Qamanirjuaq Herd, and a motion to not approve such activities and provide all stakeholders with a letter indicating the same approved.

To protect the calving and post-calving grounds of the Qamanirjuaq Herd both now and into the future, the Whale Cove HTO board of directors have motioned and all agree to oppose Anconia's Victory Lake Project and any other exploration/proposed development projects on the calving and post-calving grounds of the Qamanirjuaq Herd based on IQ, the advice of other local HTOs across the Kivalliq, the Kivalliq Wildlife Board as well as recommendations from the BQCMB.

Moved By: \_Roy Kriterdluk\_\_\_\_\_

Seconded By: \_Gerard Maktar\_\_\_\_\_

Motion # \_09/01/13\_\_\_\_\_ -Carried-

If you have any questions, concerns or comments, please contact the Whale Cove HTO at the contact information provided below.

Signed;

Stanley Adjuk

Whale Cove HTO Chairman

As directed by the Whale Cove HTO Board of Directors

P.O. Box 119

Whale Cove NU.

X0C 0J0

Ph: (867)896-9944 / Fax: (867)896-9143  
E-Mail: whalecovehto@qiniq.com

Cc: Anconia Resources  
Kivalliq Wildlife Board  
Department of Environment  
Nunavut Impact Review Board  
Nunavut Tunngavik Inc.  
Nunavut Planning Commission  
Beverly and Qamanirjuaq Caribou Management Board  
Kivalliq HTOs



**Athabasca Denesuline Negotiation Team**

December 11, 2013

Percy Kabloona, Acting Chair  
Nunavut Planning Commission  
P.O. Box 2101  
Cambridge Bay NU X0B 0C0  
Sent by E-mail: [sehaloak@nunavut.ca](mailto:sehaloak@nunavut.ca)

**RE: Protecting Caribou in Nunavut - Nunavut Land Use Planning**

Mr. Kabloona,

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, Ahiak, Bathurst and Qaminirjuaq barrenground 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.

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.

Email: [rrobillard@adnlc.ca](mailto:rrobillard@adnlc.ca) or [tgiroux@adnlc.ca](mailto:tgiroux@adnlc.ca)

Chief Joseph Custer Reserve # 201

Mailing address: Box 23126 South Hill PO, Prince Albert, Sask. S6V 8A7

Phone: (306) 765-2560 Fax: (306) 763-2973

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”*.

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.

We ask that you incorporate our recommendations in the final land use plan to safeguard caribou while they are in Nunavut for the thousands of users who depend on caribou for sustenance, a traditional reliance that crosses all political boundaries. Nunavut land use planning would be remiss if it did not address caribou conservation issues for all jurisdictions affected.

At this time, we would like to invite the NPC to our communities in order to effectively consult with us on the draft NLUP. Please contact our coordinator, Connie Cheecham to assist in coordinating this consultation at (306) 765-2560 or email [ccheecham@adnlc.ca](mailto:ccheecham@adnlc.ca).

If you have any questions, please do not hesitate to contact me at (306) 765-2560 or email: [rrobillard@adnlc.ca](mailto:rrobillard@adnlc.ca).

Regards,

A handwritten signature in black ink, appearing to read 'R. Robillard', is positioned to the left of a vertical yellow line.

Ronald Robillard  
President, Denesuline Né Né Land Corporation

cc.

Distribution List (attached)

Chief Earl Lidguerre, Fond du Lac Denesuline First Nation

Chief Rick Robillard, Black Lake Denesuline First Nation

Chief Bart Tsannie, Hatchet Lake Denesuline First Nation

## Distribution List

Honourable Johnny Mike, Minister of Environment, Government of Nunavut

Honourable George Kuksuk, Minister of Economic Development and Transportation,  
Government of Nunavut

Honourable J. Michael Miltenberger, Minister of Environment and Natural Resources,  
Government of the Northwest Territories

Drikus Gissing, Wildlife Director, GN-DOE

Lynda Yonge, Director of Wildlife, GNWT-ENR

Mitch Campbell, Kivalliq Regional Biologist, GN-DOE

Elizabeth Copland, Chair, Nunavut Impact Review Board

Ben Kovic, Chair, Nunavut Wildlife Management Board

Gabriel Nirlungayuk, Wildlife Manager, Nunavut Tunngavik Inc.

David Ningeongan, President, Kivalliq Inuit Association

Charlie Evalik, President, Kitikmeot Inuit Association

Ross Tatty, Chair, Kivalliq Wildlife Board

Attima Hadlari, Chair, Kitikmeot Regional Wildlife Board

James Qillaq, Chair, Qikiqtaaluk Wildlife Board

Alain Grenier, Acting Regional Director General, AANDC Nunavut Regional Office

Jeff Mercer, Manager of Land Administration, AANDC Nunavut Regional Office

Alex Ishalook, BQCMB member (Kivalliq Wildlife Board) and Chair, Arviat HTO

Stanley Adjuk, BQCMB member (Kivalliq Wildlife Board) and Chair, Whale Cove HTO

Earl Evans, Chair, Beverly and Qamanirjuaq Caribou Management Board



Box 1107, Fort Smith, N.W.T.

XOE 0P0

(867) 872-2643

Fax: (867) 872-5225

February 4, 2014

To whom it may concern:

The Fort Smith Metis 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.

Sincerely,

Ken Hudson

President, Fort Smith Métis Council



# **Distribution List re: Protecting Caribou Calving and Post-calving Areas, Jan/14**

<b>Individual</b>	<b>Title</b>	<b>Organization</b>	<b>Fax No.</b>	<b>E-mail Address</b>
<b>Percy Kabloona</b>	<b>Acting Chair</b>	<b>NPC</b>	<b>867-983-4626</b>	<b><a href="mailto:sehaloak@nunavut.ca">sehaloak@nunavut.ca</a></b>
Johnny Mike	Minister DOE	GN	867-975-5095	<a href="mailto:jmike@gov.nu.ca">jmike@gov.nu.ca</a>
George Kuksuk	Minister ED&T	GN	867-975-5095	<a href="mailto:gkuksuk@gov.nu.ca">gkuksuk@gov.nu.ca</a>
J. Michael Miltenberger	Minister ENR	GNWT	867-873-0596	<a href="mailto:michael.miltenberger@gov.nt.ca">michael.miltenberger@gov.nt.ca</a>
Drikus Gissing	Wildlife Director	GN-DOE	867-975-7742	<a href="mailto:DGissing@GOV.NU.CA">DGissing@GOV.NU.CA</a>
Lynda Yonge	Director of Wildlife	GNWT-ENR	867-873-0293	<a href="mailto:Lynda_Yonge@gov.nt.ca">Lynda_Yonge@gov.nt.ca</a>
Mitch Campbell	Kivalliq Regional Biologist	GN-DOE	867-857-2986	<a href="mailto:mcampbell@gov.nu.ca">mcampbell@gov.nu.ca</a>
Elizabeth Copland	Chair	NIRB	867-983-2594	<a href="mailto:rbarry@nirb.ca">rbarry@nirb.ca</a>
Ben Kovic	Chair	NWMB	888-421-9832	<a href="mailto:tsataa@nwmb.com">tsataa@nwmb.com</a>
Gabriel Nirlungayuk	Wildlife Manager	NTI	867-645-3451	<a href="mailto:gnirlungayuk@tunngavik.com">gnirlungayuk@tunngavik.com</a>
David Ningeongan	President	Kivalliq Inuit Association	867-645-2348	<a href="mailto:dningeongan@kivalliqinuit.ca">dningeongan@kivalliqinuit.ca</a>
Charlie Evalik	President	Kitikmeot Inuit Association	867-983-2701	<a href="mailto:kiapresident@qiniq.com">kiapresident@qiniq.com</a>
Ross Tatty	Chair	Kivalliq Wildlife Board	867-645-4861	<a href="mailto:kwb@niws.ca">kwb@niws.ca</a>
Attima Hadlari	Chair	Kitikmeot Regional Wildlife Board	867-769-6713	<a href="mailto:krwb@niws.ca">krwb@niws.ca</a>
James Qillaq	Chair	Qikiqtaaluk Wildlife Board	867-928-8431 AND 867-979-3390	<a href="mailto:nqwb@niws.ca">nqwb@niws.ca</a> AND <a href="mailto:jprice@qwb.niws.ca">jprice@qwb.niws.ca</a>
Ian Gray	RDG	AANDC-NU	867-975-4286	<a href="mailto:Ian.Gray@aandc.gc.ca">Ian.Gray@aandc.gc.ca</a>
Jeff Mercer	Manager, Land Administration	AANDC-NU	867-975-4286	<a href="mailto:Jeff.Mercer@aandc.gc.ca">Jeff.Mercer@aandc.gc.ca</a>
Alex Ishalook	Chair	Arviat HTO	867-857-2636	<a href="mailto:arvhto@qiniq.com">arvhto@qiniq.com</a>
Stanley Adjuk	Chair	Whale Cove HTO	867-896-9143	<a href="mailto:whalecovehto@qiniq.com">whalecovehto@qiniq.com</a>
Earl Evans	Chair	BQCMB	204-467-7999	<a href="mailto:rossthompson@mymts.net">rossthompson@mymts.net</a>



## Lutsel K'e Dene First Nation

Post Office Box 28  
Lutsel K'e, Northwest Territories  
X0E 1A0

Toll-Free: 1-866-219-9033  
Fax: (867) 370-3010

January 31<sup>st</sup>, 2014

Percy Kabloona, Acting Chair  
Nunavut Planning Commission  
P.O. Box 2101  
Cambridge Bay NU X0B 0C0  
Sent by E-mail: [sehaloak@nunavut.ca](mailto:sehaloak@nunavut.ca)

RE: Protecting Caribou in Nunavut - Nunavut Land Use Planning

Mr. Kabloona,

The Lutsel K'e Dene First Nation (LKDFN) has a strong history of survival off of the great abundance the barrenlands 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 barrenground 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).

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 Ahiak 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.

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, and with projects moving forward in the calving grounds, LKDFN feels we must urge the NPC to make wise decisions for the sake of the caribou.

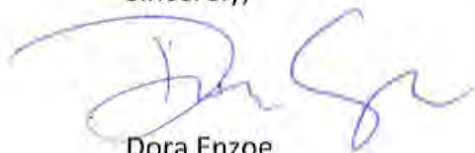
With mineral exploration and mining potential continually encouraged by the Canadian Government, protection of these vulnerable areas falls to the shoulders of the territorial, Aboriginal and Inuit Governments. LKDFN has been encouraging the Government of the Northwest Territories to be more vocal during environmental assessments that relate to these important areas, especially considering the trans-boundary 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.

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.

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](mailto: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.

Sincerely,



Dora Enzoe  
Chief LKDFN

CC via email:

Honourable Johnny Mike, Minister of Environment, Government of Nunavut

Honourable George Kuksuk, Minister of Economic Development and Transportation,  
Government of Nunavut

Honourable J. Michael Miltenberger, Minister of Environment and Natural Resources,  
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Earl Evans, Chair, Beverly and Qamanirjuaq Caribou Management Board