



By Electronic mail: *npc@nunavut.ca*

Sanikiluaq



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Serving the
communities of

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1. Consultation/Notification Guidelines

The Qikiqtani Inuit Association is proposing a method to continuously involve communities in the land use planning and project review processes. The first step is to introduce a requirement for community notification and consultation into the conformity determination stage of project review.

According to the Nunavut Planning Commission's "Implementing the Nunavut Land Use Plan" document, section 4.2 lists various requirements for community engagement and notification. Section 4.2.2 states that *information regarding project proposals in the NSA shall be readily available to ensure that residents of the NSA are aware and informed of development activity as and where it occurs.*

NPC has identified that the *extent and nature of notification will be carried out in accordance with the "Notification Guidelines" prepared and approved in accordance with section 17 of the NUPPAA and that the NPC will not accept or consider project proposals that have not met the "Notification Guidelines."*

QIA has developed a list of recommendations and guidelines for Proponents in what we have called our *Consultation Guide*. It is QIA's aspiration that the guide form an integral part of the NPC *Notification Guidelines*.

This Consultation guide has been appended to this letter for your review and comment.

2. Respecting Inuit Values

As a Designated Inuit Organization under the Nunavut Land Claims Agreement, QIA has the responsibility of protecting the rights and values of Inuit in its region. It is QIA's opinion that Inuit are the best positioned to offer advice on the management of land use activities in their respective regions. QIA has proposed a mechanism in the consultation guide to involve communities early on in the conformity determination process so that they can be informed of activities that could impact the land or water within, or adjacent to, their community boundaries. This engagement early on will provide certainty and also solidify relationships between proponents and communities. QIA is taking the stance that the NLUP can apply to IOL if this means that there will be better engagement with communities early-on and also that Inuit are able to be active decision makers on potential land use activities on Crown Land near their community boundaries.



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QIA is also of the opinion that the Nunavut Land Use plan remain a fluid document which would be amendable as the values of community members may change over time.

3. Public Forum for Consultation Reports and Community Checklists

As per section 4.3.7 of the NPC Implementation document, QIA requests that the NPC provide the resources to host an on-line registry of Proponent Consultation Reports as well as respective Community Checklists for each project

4. Nunavut Implementation Document

Section 4.3.3 & 4.3.4. In order to be consistent with the requirements of the consultation/notification guidelines QIA recommends that section 4.3.3 of the implementation document indicate that the project proposal must also include the Proponent Consultation Report (Form 1 in the consultation guide) that the proponent is required to submit to NPC for conformity determination.

4.3.7: In this section of the document it states that “ *NPC will also notify affected communities than an application has been received in accordance with the Notification Guidelines*” QIA request further detail on how the affected communities will be notified, will this also be through the online public registry or will a different mechanism be used to contact these communities?

4.3.8 b) According to this section of the implementation document once the project proposal application is complete, NPC will “establish if the proposal is contemplated in the area in which is it proposed and *what, if any, recommendations or standards may apply to that location*. QIA recognizes that NPC’s conformity determination is quantitative and not qualitative, however we suggest that any recommendations or standards that are applied to a conformity determination take into consideration the comments and community feedback as outlined in the consultation report (Form 2 in consultation guide) issued to NPC in accordance with the notification/ consultation guidelines.

Section 5.4: Project Monitoring: QIA questions why the NPC plans on conducting site visits and reviewing permits, licenses and authorization issued by regulatory agencies. Is this not duplicating what is already done by authorizing agencies? What additional value is there to NPC conducting these visits?



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5. Proposed Management Areas and IOL Designations.

QIA has noted that the proposed management areas in the Draft NLUP are similar to the land selection criteria for Inuit Owned Lands as outlined in Article 17 of the Nunavut Land Claims Agreement. The proposed management plans in the DNLUP are:

- Protecting and Sustaining the environment
- Encouraging conservation planning
- Building Healthier communities
- Encouraging Sustainable Economic development
- Mixed use

In comparison, the selection criteria of Inuit Owned Land parcels are:

- Conservation
- Cultural importance
- Commercial or economic value
- Wildlife harvesting areas.

The purposes of Inuit Owned Land Parcels and land use designations in the Qikiqtani region have been established and recorded for this region. QIA notes the importance of ensuring that the original purpose of the IOL parcels correspond with the land use designation in the corresponding proposed management plan in the DNLUP.

6. Chapter 3: Encouraging Conservation Planning: Lancaster Sound National Marine Conservation Area.

The Qikiqtani Inuit Association is a steering committee member for the proposed Lancaster Sound National Marine Conservation Area (NMCA), which is currently undergoing a feasibility study. In 2010 Parks Canada, representing the Government of Canada proposed a boundary for the NMCA, this boundary corresponds to the land use designation ECP-1 (79) on the map Schedule A: Nunavut Land Use Plan Land Use Designations. Throughout the feasibility study, QIA has been conducting community consultations and has collected Inuit Qaujimajatuqangit (IQ). In 2012, based on feedback from these consultations, QIA proposed a different boundary for the Lancaster Sound NMCA, which is larger than the area delineated by ECP-1 (79). The feasibility study for the NMCA is anticipated to be completed by the end of 2014, at this time the Steering committee will make a recommendation on the feasibility of



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the NMCA as well its final boundary. If upon completion of the feasibility study the boundary of the Lancaster Sound NMCA differs from that in the DNLUP, QIA would like to ensure that this change is reflected in the NLUP. How could the NPC accommodate a change in the boundary of the Lancaster NMCA if this was made prior to the completion of the NLUP and if it was made after the completion of the NLUP?

7. Conformity Determination for Aerial Surveys

Aerial surveys are becoming more common in the Qikiqtani region, whether they are geophysical surveys, wildlife surveys, low level flights or helicopter transits. Communities have expressed concern with disturbances from these surveys and frustration with not being consulted or informed of surveys occurring near their communities and land use areas. Currently aerial surveys that do not require a land use permit from an authorizing agency, do not require a conformity determination from the Nunavut Planning Commission and they are exempt from NIRB screening under Schedule 12-1 of the NLCA. QIA believes that due to the high level of concern surrounding aerial surveys as well as the potential cumulative effects of numerous project proposals for aerial surveys, they should require a conformity determination from NPC and should be subject to the conditions of the consultation/notification guidelines developed by QIA. Section 12.3.3 of the NLCA states that the “NPC may refer a project proposal falling within Schedule 12-1 to NIRB for screening, where the NPC has concerns respecting the cumulative impacts of the project proposal ...” QIA strongly recommends that aerial surveys in the Qikiqtani region should be subject to a conformity determination from NPC for the reasons outlined in section 12.3.3 of the NLCA.

8. Soper River Watershed Designation

Regarding the Soper River watershed, QIA believes that the entire Soper River watershed outside of Katannilik Park should be designated as ECP-R1.



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