

Aboriginal Affairs and Northern Development Canada Comments on Chapter 5: Encouraging Sustainable Economic Development

It is somewhat difficult to clarify comments on this chapter given that some of the basic premises put forth and terminology used by Nunavut Planning Commission (NPC) in the Draft Nunavut Land Use Plan (DNLUP) are not shared by AANDC. For example on page 30, the DNLUP states:

“The following areas and issues have been identified to support the goal of encouraging sustainable economic development:

- *Mineral exploration and production;*
- *Oil and gas exploration and production; and*
- *Commercial fisheries*

These areas and issues are managed through Encouraging Sustainable Economic Development (ESED) Land Use Designations and/or Recommendations that support the Objectives and Policies identified below. The criteria for the Land Use Designations and Recommendations are contained in Chapter 7 and Schedules A and B.”

AANDC does not equate the activities and type of land use involved with “mineral exploration” to “production”, which perhaps is mining activity under the singular existing category of ESED-1. Much larger areas, with open access are required to sustain an exploration sector. This does not imply that all areas within the available land class will ever be fully used or developed since it is not certain where eventual economic discoveries will be made.

In Schedule A, the ESED-1 land use class is limited to existing advanced exploration projects and does not reflect the nature of current exploration activity in the territory.

The recommendations illustrated in Schedule B are far too restrictive and mineral exploration under ESED is completely absent there.

These issues are developed more fully below.

Comments on 5.1.1 Mineral Exploration and Production

Understanding the geoscience context of a deposit means knowing what lies beyond its boundaries. Very often discoveries are made beyond the boundaries of the deposit because favorable indicators were identified first in places sometimes many kilometres away. The level of geoscience knowledge known for the territory, brought out through geological mapping and exploration programs, is poor in comparison to what is known in other provinces and territories in Canada and many places around the world. For that reason Nunavut is both an attractive place to invest, because of its unknown potential for large discoveries, and a deterrent to investment because of the uncertainty.

The number of exploration sites that eventually become mineral deposits that could be mined economically is quite small. If a land use plan attempts to pre-determine where exploration or mining can take place and where not, the net effect is to discourage exploration and decrease investment. With less investment, fewer discoveries will result and economic benefits to the territory will be diminished as a consequence. Exploration activities on land are of short duration, often only a few years, and are not permanent developments. Over time, and for certain commodities, some areas become more favorable for exploration than others. It is also important to note that areas where one commodity, such as gold, may be favorable to explore in are not necessarily the same areas of interest for another commodity.

In order to indicate the level of economic activity the mining sector is likely to bring to the territory and for NPC to signal to industry, through the land use plan, what kind of potential resource economy can be developed, it must be explicitly stated both in Section 5.1.1 and in sections and chapters elsewhere, that all areas outside of communities, parks, bird sanctuaries, critical wildlife habitat, and other designated protected/conserved areas shall be open to mineral exploration activities. In some cases, significant exploration discoveries may lead to more resource development work or mining projects. Under circumstances where future exploration efforts occur outside of the proposed Mineral Development Leading to Mining Activity land use class, re-zoning of these significant areas to this class must be considered a priority under subsequent revisions to the land use plan. If the NLUP is seen as fixed or the revision process too complex or too lengthy, then economic activity where mineral exploration is concerned will be deemed too risky and investment in the territory will plummet. To instill confidence and certainty in the application of the NLUP, a clear commitment and a defined process to revisions and re-zoning must be articulated in the NLUP.

As a start for formulating a land use designation in the DNLUP for mining, two categories are proposed under an ESED land use designation: (1) Mineral Development Leading to Mining Activity and (2) Areas Open to Mineral Exploration. These two categories divide the territorial land mass into two parts, as shown in Figure 1. Each will be discussed separately.

1. Mineral Development Leading to Mining Activity

This proposed land use class can be considered as having identified the most likely places where mining activity may take place in the short to medium term. It encompasses existing sub-classes that have been described in earlier communications. These are areas of (i) active and important historic exploration activity; (ii) past-producing mines; (iii) current operating mine(s); and, (iv) projects in the permitting process. Currently, there is only one land use designation, ESED -1, which encompasses (ii) and (iii). Some of (iv) is included, but a significant area of interest, (i), is not represented at all.

It is also important to understand that geoscience knowledge of the territory is far too incomplete for the mineral potential to be known or a definitive “map” as such to be made. For the first iteration of the NLUP, in consultation with Natural Resources Canada, AANDC proposes a “Mineral Development Leading to Mining Activity” land class category in an attempt to highlight what land area in the Territory can be considered of greatest likelihood for mineral resource exploration, evaluation and exploitation. AANDC provides the accompanying map as Figure 1. In this preliminary map, we have identified 28 separate areas (with about equal distribution in each of the three regions), representing about 13% of the territory. The areas are given at a low level of cartographic precision (approximately 1:2,000,000 or less) and was arrived at by using the locations of selected mineral occurrences, an examination of historical mineral tenure held in the territory, the extent of favourable geological units based on limited

mapping, locations of past-producing mines (and current mine), locations of advanced exploration projects, and those projects currently in the review and permitting stages.

To reiterate, we currently believe it is within these areas where the highest probability exists for potential mines to be operating or where advanced exploration may continue over the next 5-10 years. It is naive to believe that accurate forecasting as presented in this land use class is possible. Thus AANDC advises caution to NPC in using this information as a tool to guide or restrict mineral exploration and mining development to only these areas. The level of detail presented in Figure 1 is approximate (subject to change and revision) and is presented to illustrate the concept and rationale that AANDC is putting forward.

For these reasons, a second land use class is required and we propose “Areas Open to Mineral Exploration”, discussed under 2. below.

Whereas other activities such as tourism and recreation may be possible in areas away from mines, but within the same land class, the uncertainty associated with speculative behaviour and challenges to mineral development projects under NLUP clauses dictate that these and all other activities incompatible with mineral development should be prohibited. Types of activities permitted could include exploration, research, roads, railways, utilities and corridors, infrastructure, and remediation and reclamation.

2. Areas Open to Mineral Exploration

New and significant investment is likely to occur within considerably larger areas of the territory, beyond the existing exploration districts outlined in Figure 1 as the Mineral Development Leading to Mining Activity land use class. What is thus required is a second land use class as “Areas Open to Mineral Exploration”, which is illustrated in Figure 1. We recognize that this area represents the remainder of the territory and overlaps with obvious restricted areas, such as (a) Territorial and National Parks, (b) communities and (c) wildlife sanctuaries, (d) reserves, and e) other areas identified as ecologically important. The withdrawal of these areas from this land class is expected; however the remainder of the territorial land mass should permit mineral exploration activity and remain open to the possibility of future mineral development leading to mining. This proposed land use class may represent all of the Mixed Use land class, but it also includes other land use classes such as PSE-2.

Allowance for transit corridors: Implications for other land use classes in the DNLUP

Whereas many prospective mineral exploration districts are isolated from communities and logistical staging points, most land use classes in the NLUP use must allow for overland and marine transportation. The known and proposed terrestrial transportation and supply corridors to support exploration and mineral development activity are noted in Figure 1. AANDC proposes that explicit allowance for this type of activity be included in the land use classes that these corridors cross. The transit corridors illustrated are of

two types: i) engineered, year-round roads and ii) seasonal right-of-way for temporary use as winter routes. The seasonal corridors can be (but need not be) defined as a separate land class, but should be recognised within the land classes they cross as being part of that land class description as a permitted activity. The constructed roads with year-round use are transportation corridors that should be identified on the NLUP map as a distinct land use class.

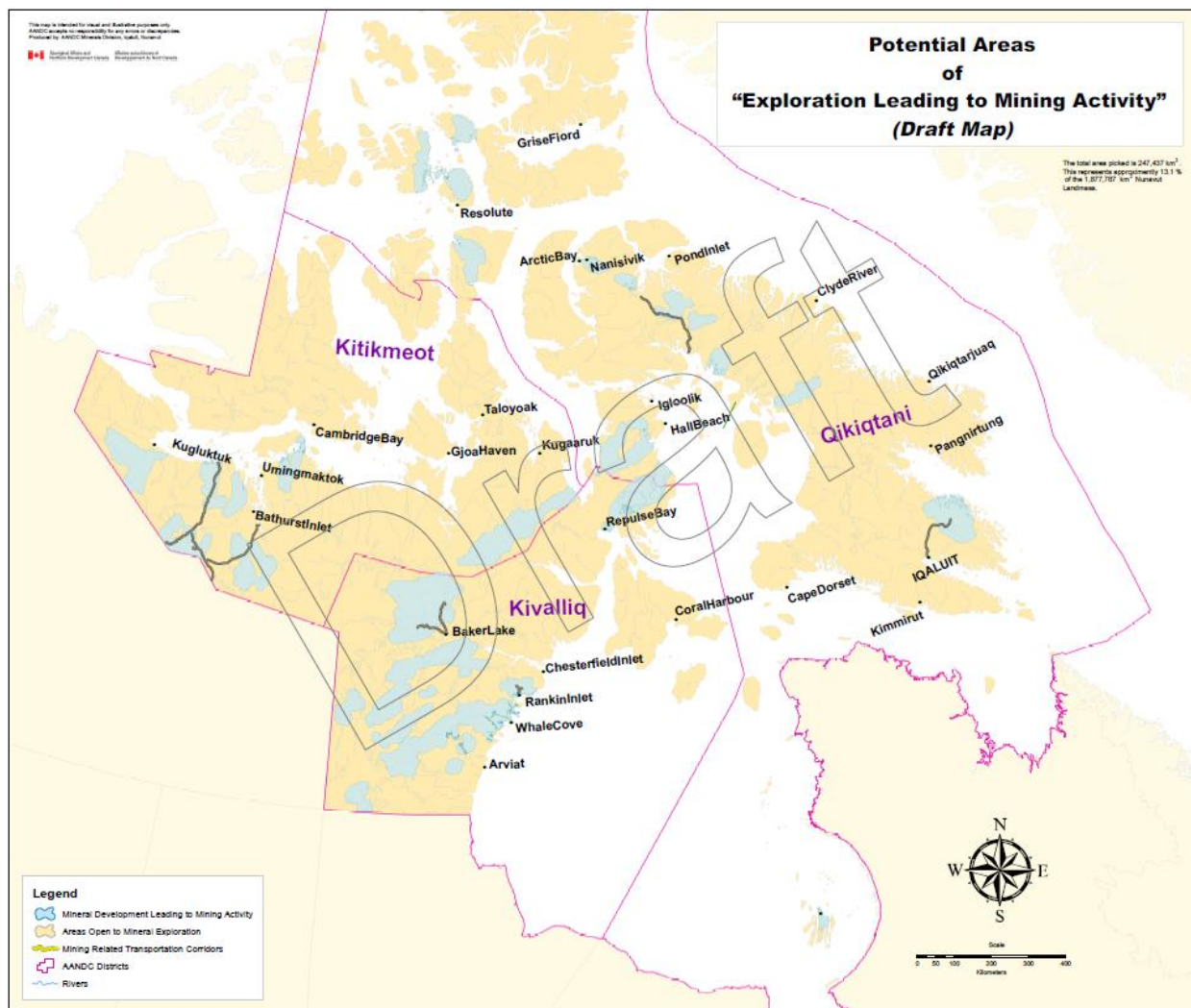


Figure 1: Draft Map of Potential Areas of Exploration Leading to Mining Activity Proposed under the Land Use Classes Designated for Mining and Mineral Development.