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Kitikmeot Inuit Association, Department of Lands & Environment
Submission to the
Nunavut Planning Commission regarding the
Draft Nunavut Land Use Plan
April 11, 2014

The Kitikmeot Inuit Association (KIA) has been invited by the Nunavut Planning Commission (NPC) to provide comments on the Draft Nunavut Land Use Plan (DNLUP or the Plan). The KIA would like to thank the NPC for the opportunity to submit our comments, and as well as its Commissioners for considering them.

As a brief introduction to our organization, the KIA is a democratically elected organization representing Inuit from across the Kitikmeot Region. The KIA's mandate is to represent the interests of Kitikmeot Inuit by protecting and promoting our social, cultural, political, environmental and economic well-being.

The KIA's mandate is broad and reflects the diverse interests of Inuit across the Kitikmeot region. As a result KIA must balance multiple objectives. Related to our mandate, the KIA is also the designated Inuit Organization for many authorities in the Nunavut Land Claim Agreement (NLCA) related to land environment, wildlife, and socio-economic benefits.

Important in relation to land use planning and the DNLUP, the KIA is the owner of and has responsibility for the management of surface Inuit Owned Land (IOL) in the Kitikmeot Region. In our role as land owners, and as the representative of Inuit from the region in general, the KIA attempts to maximize opportunities for Inuit (e.g., promoting socio-economic benefits such as employment and Inuit business creation, while maintaining harvesting opportunities) while at the same time minimizing the risks to Inuit (e.g., maintaining environment quality, and minimizing landowners liabilities, etc.). In general, the KIA promotes sustainable and environmentally responsible economic development on IOL and the Kitikmeot Region with the hopes of improving the standard of living standard for Kitikmeot Inuit.

As a result of our role in the region, the KIA has regularly participated in the NPC's DNLUP processes and consultations, and we continue to do so with this submission. At this stage in the process of the DNLUP development, it is difficult to comment on certain DNLUP matters because we have not seen full detail of the proposed Plan. The KIA needs this detail in order to understand the way the implementation of this plan will affect Kitikmeot Inuit. Based on the KIA's review of NPC's available DNLUP documents we set out our initial recommendations and comments below:



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1. The KIA recommends that all surface IOL parcels in the Kitikmeot be designated as “Mixed Use” under the draft and final NLUP.
 - a. This designation is appropriate because it reflects the purpose of the IOL selected under Article 17 of the NLCA, a mixed use designation will enable Inuit to use the land as they see fit and to exercise their rights as landowners to act as the stewards of their own lands. Kitikmeot Inuit want sustainable economic development, and they also want the opportunity to harvest for subsistence, all in the same general area. The best way to achieve these goals is to leave the discretion about land uses with the owners. This approach empowers Inuit and leaves the responsibility for land use decisions with the communities.
 - b. The KIA regularly consult with the communities. Most of the time, the KIA uses a ‘mixed use’ approach to managing multiple uses of IOL. Mixed use can range from resource development to conservation. On rare occasions a small number of IOL parcels in the Kitikmeot have been designated for only one purpose (i.e. conservation purposes), but the KIA wishes to maintain its discretion on these decisions. Because surface IOL is privately owned, the KIA wishes to maintain the right to decide how land is used, including any potential and reasonable closure to development.
2. The KIA recommends that terrestrial access or marine access not be restricted to surface IOL in any way by the DNLUP or the final Plan, except with the written consent of the KIA.
3. The KIA recommends that traditional Inuit place names to be used for ALL project proposals in the Kitikmeot. We make this recommendation in order for Inuit to better understand the location where projects are proposed.
4. The KIA commends the NPC’s Kitikmeot community consultation efforts in March 2014. The NPC staff did an excellent job of documenting Inuit land uses, and knowledge of ecological rhythms and patterns. Once a Plan is in place and development is proposed, the KIA is of the understanding that the NPC will issue a project conformity determination to the proponent that will highlight Inuit land use and concerns in the project area. Likewise, the KIA understands that the NPC will pass on the local Inuit land use and knowledge to the NIRB and NWB for these organizations to consider as part of their further assessment of the project. The KIA is pleased that the NPC determination will communicate this information to both the proponent and other Institutes of Public Government (IPG) because:
 - a. it informs the proponent that their project may be occurring in a multiple use area, and that the proponent may need to undertake mitigative measures if they want the project to proceed;
 - b. it informs the other IPGs to be considerate of the multiple uses occurring in the project vicinity;



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- c. it also informs the IPGs of the local issues and concerns, and allows the IPG to assess the adequacy of the proponents mitigation plan, or to propose alternatives if the plan is insufficient.
5. While the KIA commends the NPC for its March 2014 Kitikmeot community consultations, it must be understood that the NPC's timelines offered the KIA, and especially other Kitikmeot groups (hamlets, HTOs, other organizations, etc.), very little time after these meetings to meaningfully participating in the NLUP process and comment on the DNLUP. The KIA understands that it may still make submissions which will be considered by the NPC at its hearing in Iqaluit in November of this year.
6. During the NPC meetings in Cambridge Bay (September 18 and 19, 2014), the KIA requested clarification from the NPC and Parks Canada (present via teleconference) regarding the status of the proposed extension to the Tukturnogait National Park in Nunavut. The KIA continues to require this clarification.
7. The KIA recommends that proponents of conservation areas provide a comprehensive and modern multi-use geological and ecological resource inventory (e.g., the Rasmussen Lowlands south of Taloyoak, and Kagloryuak River on Kiilnik-Victoria Island). Inuit should have the ability to see all the potential uses and benefits of the land, and combine it with the unique Inuit knowledge of the land before making resource management and zoning decisions. In the past, the Queen Maud Gulf Bird Sanctuary, and the Thelon Wildlife Sanctuary were established without consulting Inuit, or without providing Inuit with full information about the resources within those areas. Part of the consultation process is providing the information required in order to make a sound resource management decision. Inuit must understand the opportunity costs associated with the establishment of such areas before decisions are made.
8. The KIA would also like to learn more about existing conservation areas. The KIA recommends that the Canadian Government complete a modern geological, economic, and ecological resource inventory for the Queen Maud Gulf Migratory Bird Sanctuary and that portion of the Thelon Wildlife Sanctuary within the Kitikmeot Region. Ideally, conservation areas should be located in areas where it provides most benefit to Inuit. These conservation areas were established without this consideration in mind.
9. Inuit rely on harvesting several wildlife species as part of their cultural and economic needs. Among these wildlife, there is currently a particular interest in Caribou management. Caribou are an important resource to Kitikmeot Inuit. We realize that some of these caribou populations have trans-boundary ranges and wise multiple-use management of the entire herd range will be required to conserve the population throughout their winter and summer range. We respect that many organizations share our concern for healthy wildlife populations. We hope that they will manage their lands and environment within the scope of their authority and jurisdiction. Within its authority and jurisdiction, the KIA will promote the responsible management of wildlife populations within the Kitikmeot Region, and will carefully review development



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proposals to ensure that the KIA maintains sustainable harvesting opportunities for Kitikmeot Inuit now and in the future.

10. Any NLUP proposals or restrictions on the use of oceans in the Kitikmeot Region including the Northwest Passage must require the consent of the KIA as it may affect access to IOL or Kitikmeot Inuit harvesting rights.

The KIA hopes that these comments and recommendations are helpful to the NPC in moving forward with the DNLUP. If you have any follow up questions as a result of the submission, please contact Luigi Torretti, KIA's Senior Environment Officer at your convenience.

Sincerely,

A handwritten signature in dark ink, appearing to read "Geoffrey Clark". The signature is fluid and cursive.

Geoffrey Clark
Director of Lands, Environment and Resources
Kitikmeot Inuit Association

CC: Paul Emingak, KIA Executive Director
Luigi Torretti, KIA Senior Environment Officer