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May 15, 2014

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Nunavut Planning Commission
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Protecting Caribou in Nunavut - Nunavut Land Use Planning

At the November 2013 and May 2014 meetings of the Beverly and Qamanirjuaq Caribou Management Board (BQCMB), Board members and other meeting participants were alarmed to learn that the Draft Nunavut Land Use Plan (Draft Plan) contains no restrictions on any land use activities in caribou calving and post-calving areas. It is our understanding that Caribou Protection Measures, which are currently applied through the Keewatin Regional Land Use Plan, are also absent from the Draft Plan. We are very concerned about this lack of protection for barren ground caribou herds while they are in Nunavut. As you know, several of the herds that spend part of each year in the Kivalliq or Kitikmeot regions of Nunavut are shared by numerous communities, both in Nunavut and in other jurisdictions, including the Northwest Territories, Saskatchewan and Manitoba.

We find it particularly troubling that the Draft Plan 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 Draft Plan 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 Draft Plan 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.

We acknowledge the immense challenges your organization faces in accommodating the long list of issues a land use plan must consider. That being said, we respectfully request that you give high priority to developing ways to provide protection for caribou calving and post-calving areas during development of the final Nunavut-wide land use plan. This protection should include *prohibition of industrial development (including mineral exploration) from caribou calving areas and post-calving areas*. 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 ask that you incorporate our recommendations in the final land use plan to safeguard caribou while they are in your territory for the thousands of users who depend on caribou for subsistence, a traditional reliance that crosses all political boundaries. Nunavut land use planning would be remiss if it did not address caribou conservation issues for Nunavummiut, for other users of the caribou herds and for all Canadians.

Sincerely,

Acting Chief - Tadoule Lake, Manitoba

Sayisi Dene First Nation