

Master Comments from Athabasca Densuline

Comment ID	Organization Name	Date of Submission	Document Referenced	Section Referenced	Theme of submission or Location /ID# Referenced	Comment	NPC Response
AD-1	Athabasca Denesuline	11/12/2013			Caribou	<p>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, Ahiaik, Bathurst and Qaminirjuaq barren ground 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.</p> <p>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.</p>	The revised DNLUP addresses calving and post-calving areas. Areas where there is no mineral potential have been protected from development. This amounts to nearly 5% of the NSA. Areas where there is believed to be mineral potential or existing mineral rights the Plan proposes cumulative impacts referrals and other Terms to ensure only project proposals that have been screened for impacts will be able to proceed into the regulatory process. The Plan also prioritizes research that needs to be undertaken to better protect caribou.
AD-2	Athabasca Denesuline	11/12/2013			Caribou	<p>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".</p>	Comment has been addressed above.
AD-3	Athabasca Denesuline	11/12/2013			Caribou	<p>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.</p>	The caribou protection measures are not included in the Plan because they are considered duplication of regulations and processes implemented by AANDC and DIOs. As well the measures are dated. If new measures were developed that reflected seasonal migrations of the individual herds these could be considered by plan amendment, Government is ultimately responsible for wildlife and needs to get buy-in on revised caribou protection measures.