Nunavunmi Parnaiyiit
Nunavut Planning Commission
Commission d'Aménagement du Nunavut

Master Comments from Mining Watch Canada

Comment ID	Organization Name	Date of Submission	Document Referenced	Section Referenced	Theme of submission or Location /ID# Referenced	Comment	NPC Response
MWC-01	Mining Watch Canada	4/14/2014	DNLUP	2.1.2	Caribou	We recommend that the Nunavut Land Use Plan exclude mineral exploration and development activities in the most critical of caribou habitats: calving and post-calving areas. This exclusion should extend to ancillary facilities and infrastructure that may be proposed for access to other areas for exploration and development. With the proposed prohibition, companies and those working to save the caribou will avoid the time-consuming and damaging conflict regarding industrial activities in these sensitive habitats and will benefit from a more efficient use of their limited resources.	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. This approach has been taken to minimize fragmentation of caribou habitat.
MWC-02	Mining Watch Canada	4/14/2014	DNLUP	5.1.1	Mining	Because of the risks of managing radioactive wastes associated with uranium mining, and the controversial and high-risk aspects of the nuclear fuel chain, mining uranium raises a higher level of concern in communities than most other kinds of mining. This added level of concern is warranted and needs to be addressed if a uranium project is to achieve a social license to operate. (MiningWatch's position is that new uranium mines are unnecessary and undesirable but we respect the authority of communities to come to their own conclusions.) We submit that the requirement of the Keewatin Regional Land Use Plan for a demonstration of approval by the people in the affected region is an important policy for addressing the concerns about uranium mining, and that it should be included in the Nunavut Land Use Plan.	The DNLUP looks at the land use of mining in general and does not consider individual commodities. Under the Nunavut Land Claims Agreement the Commission is responsible for determining conformity of project proposals. Government is responsible for determining this type of policy direction.
MWC-03	Mining Watch Canada	4/14/2014	DNLUP	5.1.1	Mining	We recommend that in addition to established review and licensing procedures, advanced exploration and uranium mine proposals be required to demonstrate the Free Prior and Informed Consent (FPIC) of the affected communities in a transparent and accountable manner. As per established international-norms for FPIC, such as the UN Declaration on the Rights of Indigenous Peoples, the specifics of such a process must be developed with the affected communities and conducted in a manner that is acceptable and consistent with their values and customs.	The comment is addressed above.