

## Master Comments from World Wildlife Fund

Comment ID	Organization Name	Date of Submission	Document Referenced	Section Referenced	Theme of submission or Location /ID# Referenced	Comment	NPC Response
WWF-1	World Wildlife Fund	14/02/2014	Option and Recommendations	Chapter 2	Caribou	WWF supports the rationale for conserving caribou and protecting caribou habitats (calving and post-calving areas, sea ice crossings and water crossings) stated "up-front" in the 2011/2012 draft Nunavut Land Use Plan (NLUP), as well as the general recommendations PSE-R2, PSE-R3 and ECP-R1 in the Plan, and the management Options identified in the Options and Recommendations (O&R) document. We do not support all the Options that are actually recommended by NPC. We believe that some of NPC's recommended Options for caribou habitats are inconsistent with the ecological, cultural and economic value of these areas, as determined by Nunavummiut, the scientific community, governments, caribou management boards, non government organizations, and by NPC itself. In keeping with the mention of Species at Risk meriting "special attention" in the NLUP, WWF has made specific recommendations regarding the Dolphin and Union herd and Peary caribou in the Caribou Sea Ice Crossings section of our submission, as well as for areas of known concentration of Peary caribou in the High Arctic. Further, everything we have recommended regarding calving and post-calving areas for Nunavut's migratory tundra mainland herds is meant to apply to these two special caribou populations as well.	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.
WWF-2	World Wildlife Fund	14/02/2014	Option and Recommendations	Chapter 2	Caribou	For Caribou Calving and Post-Calving Areas (Figure 1 and 2): 1) Assign a designation that prohibits all new industrial uses in core calving and post-calving areas representing 95% occupancy. The only uses that should be permitted in these cores are tourism and research—subject to special conditions when calving caribou are present.	Comment addressed above
WWF-3	World Wildlife Fund	14/02/2014	Option and Recommendations	Chapter 2	Caribou, Parks, Wildlife areas	For Caribou Calving and Post-Calving Areas (Figure 1 and 2): 2) WWF supports NPC's recommended management Option 1 for the proposed Bathurst National Park, Thelon Wildlife Sanctuary and all National Wildlife Areas.	General comment noted.
WWF-4	World Wildlife Fund	14/02/2014	DNLUP/Option and Recommendations	2.1.2, Chapter 2	Caribou, Parks	For Caribou Calving and Post-Calving Areas (Figure 1 and 2): 3) Assign a designation that permits tourism, recreation and research and prohibits all other uses in the proposed Blue Nose Lake Area National Park, until such time as the Park boundaries have been agreed upon by the affected communities and a Park management plan has been developed.	Comment addressed above
WWF-5	World Wildlife Fund	14/02/2014	Option and Recommendations	Chapter 2	Caribou	For Caribou Sea Ice Crossings and Peary Caribou Terrestrial Habitat (Figure 3 and 4): 1) Assign a designation that provides seasonal restrictions and conditions on all (industrial) development, such as shipping and ice breaking, for caribou sea ice crossings, especially for the Dolphin and Union herd and Peary caribou.	We did not receive any information regarding a time when the access restrictions would occur so a defensible seasonal management term could not be developed. The Plan does provide Direction to regulatory Authorities to take them into account during permitting and licensing.
WWF-6	World Wildlife Fund	14/02/2014	Option and Recommendations	Chapter 2	Caribou	Pg 5 - For Caribou Sea Ice Crossings and Peary Caribou Terrestrial Habitat (Figure 3 and 4): 2) For the all terrestrial habitat, particularly the Fosheim Peninsula and Eastern Axel Heiberg Island area, assign a designation that permits tourism, recreation, research and prohibits all other uses.	The land use designations have been simplified. The Plan only identifies prohibited uses. Protected areas and special management are used to manage varying characteristics.
WWF-7	World Wildlife Fund	14/02/2014	Option and Recommendations	Chapter 2	Caribou	Pg 5 - For Caribou Water Crossings:3) Assign a designation that allows for seasonal restrictions and conditions on industrial uses that could negatively impact the ecological significance of these sites for caribou.	Comment has been addressed above
WWF-8	World Wildlife Fund	14/02/2014	Option and Recommendations	Chapter 3	Caribou, Heritage Rivers	Pg 5 - For Caribou Water Crossings: 4) WWF supports NPC's recommended Option 1 for the portion of the Soper Heritage River that lies outside Katannilik Territorial Park.	General comment noted.
WWF-9	World Wildlife Fund	14/02/2014	Option and Recommendations	Chapter 3	Caribou, Heritage Rivers	Pg 5 - For Caribou Water Crossings: 5) Assign a designation that permits tourism, recreation and research and prohibits all other uses for the Thelon and Kazan Heritage Rivers.	Comment has been addressed above
WWF-11	World Wildlife Fund	14/02/2014	DNLUP	Table 2: Recommendations	Caribou	Pg 6 -On page 43 of the Plan, in Table 2, NPC assigns the following general Recommendation (PSE-R2) regarding caribou calving and post-calving areas, to be implemented by Regulatory Authorities, DIOs, Municipalities, and Proponents: "Project Proposals located in historic caribou calving grounds should take into account impacts on caribou calving, post-calving and migration routes." In WWF's view, such general language as "take into account impacts" is too vague and permissive, given the importance assigned to caribou and their calving and post-calving areas earlier in the Plan.	Comment has been addressed above
WWF-12	World Wildlife Fund	14/02/2014	Option and Recommendations	Chapter 3	Caribou, Parks	Pg 7 -Of particular interest to WWF are the proposed Bathurst Island National Park, the proposed Bluenose Lake Area National Park, the Thelon Wildlife Sanctuary and all National Wildlife Areas (NWAs). WWF's specific recommendations for these areas are outlined in the section that follows. WWF's Recommendations regarding Caribou Calving and Post-Calving Areas:1) WWF recommends that NPC select Option 2, namely "assign a designation that restricts (prohibits) all (new industrial) development" in core calving and post-calving areas, representing 95% occupancy—See Figure 1.	Comment has been addressed above. Land use designations have been applied to these areas.

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WWF-13	World Wildlife Fund	14/02/2014	DNLUP	2.1.2	Caribou	Pg 7 - In the case of the Beverly herd, there is debate as to whether this calving area (historic calving areas) is being used at all, although WWF recommends that it would be wise to protect at least the recently-known core, in case the Beverly herd re-establishes itself and re-occupies a calving area used by over 200,000 animals for decades. The core (or priority) calving and post-calving areas are those known to be utilized by 95% of calving animals every year in the recent past...WWF recommends that the spatial definition of such core areas should be updated every five years, as new data become available, and included in the scheduled overall review of the NLUP...WWF further recommends that the only uses that should be permitted in these cores areas are tourism and research-- subject to special conditions when calving caribou are present, agreed upon by the Government of Nunavut (GN), Aboriginal Affairs and Northern Development Canada (AANDAC), and Designated Inuit Organizations (DIOs). Implementation of these restrictions should be monitored by observers from local Hunters and Trappers Organizations (HTOs).	Comment has been addressed above
WWF-14	World Wildlife Fund	14/02/2014	Option and Recommendations	Chapter 3	Caribou, Parks	Pg 8 - 2) WWF supports NPC's recommended Option 1 for the proposed Bathurst National Park, Thelon Wildlife Sanctuary and all NWAs, namely, "Assign a designation that permits tourism, recreation and research and prohibits all other uses," and we support NPC's reasons for recommending this Option in each case. We also believe that this Option would provide adequate protection to caribou calving and post-calving areas and to caribou when they are using them.	Comment has been addressed above. Land use designations have been applied to these areas.
WWF-15	World Wildlife Fund	14/02/2014	Option and Recommendations	Chapter 3	Caribou, Parks	Pg 8 - 3) WWF does not support NPC's recommended Option 3 for the proposed Blue Nose Lake Area National Park. In our view, this Option would not provide adequate protection for caribou calving and post-calving grounds, and would allow additional uses that may not be permitted in the Park management plan when it is developed. Instead, WWF recommends Option 1, namely "Assign a designation that permits tourism, recreation and research and prohibits all other uses," until such time as the Park boundaries have been agreed upon by the affected communities, and a Park management plan has been developed. This recommendation would provide at least interim protection to caribou calving and post-calving areas, and keep the broadest range of options open to Nunavummiut and to Canadians when it comes to formal Park establishment and developing a Park management plan.	Comment has been addressed above. Land use designations have been applied to these areas.
WWF-16	World Wildlife Fund	14/02/2014	Option and Recommendations	Chapter 3	Caribou	Pg 9 -WWF's recommendation regarding the Fosheim Peninsula and Eastern Axel Heiberg Island area, especially for its significance to Peary caribou, is outlined below. WWF's Recommendation Regarding Caribou Sea Ice Crossings and Peary Caribou Habitat. 4) WWF recommends NPC's Option 4, which would "assign a designation that provides seasonal restrictions" for all caribou sea ice crossings. This recommendation is especially important for the Dolphin and Union herd crossing between the mainland and Victoria Island (NPC's Map 56), and for all Peary caribou sea ice crossings in the High Arctic Islands, including between Prince of Wales and Somerset Islands (NPC's Map 57). WWF's recommended option would not require permanent protection of these crossing areas, or closure to all industrial development. But there should at least be seasonal restrictions and conditions on shipping and ice-breaking during the spring and fall periods when caribou are using these crossing sites for their annual migration...	Comment has been addressed above. Land use designations have been applied to these areas.
WWF-17	World Wildlife Fund	14/02/2014	Option and Recommendations	Chapter 2	Caribou	Pg 10 - WWF further recommends that any restrictions/conditions for shipping and ice-breaking in or near caribou sea ice crossings should be arrived at in consultation with the shipping industry and with HTOs from the affected communities, who should be seasonally employed both onshore and onboard, to advise shippers onsite during the affected seasons, and to ensure that the agreed-upon restrictions/conditions are followed.	Comment has been addressed above. Land use plans cannot "require" a proponent to consult and engage residents. There is a general comment in the Plan that encourages engaging Inuit early on the process.
WWF-18	World Wildlife Fund	14/02/2014	Option and Recommendations		Caribou	Pg 10 -With respect to endangered Peary Caribou, WWF recommends that all terrestrial habitat be identified in the NLUP as PSE sites by NPC, and that the recommended management Option be similar to Option 1, as identified for a number of ECP sites, namely "assign a designation that permits tourism, recreation and research and prohibits all other uses."	This concern has been addressed in the revised DNLUP based on the information that has been provided to the NPC by Government.
WWF-20	World Wildlife Fund	14/02/2014	Option and Recommendations	Chapter 3	Caribou, Heritage Rivers	Pg 10 -In the O&R document, NPC identifies four management Options for the three Heritage Rivers designated so far in Nunavut: the Soper, Thelon and Kazan. WWF's recommendations regarding NPC's recommended management Options for these three Heritage Rivers follow in the section below. WWF's Recommendations regarding Caribou Water Crossings- 6) WWF recommends Option 4 for all traditionally-known caribou water crossings in the NSA, namely that they be assigned a designation that allows for seasonal restrictions and conditions upon industrial uses that could negatively impact the ecological significance of these sites for caribou, and that protects caribou when they are using them.	Response has been provided for a previous comment.
WWF-21	World Wildlife Fund	14/02/2014	Option and Recommendations	Chapter 3	Heritage Rivers	pg 11 - 7) WWF supports NPC's recommended Option 1 for the portion of the Soper River watershed outside of Katannilik Territorial Park, namely, "Assign a designation that permits tourism, recreation and research, and prohibits all other uses."	Response has been provided for a previous comment.



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WWF-22	World Wildlife Fund	14/02/2014	Option and Recommendations	Chapter 3	Caribou, Heritage Rivers	pg 11 - 8) WWF does not support NPC's recommended Option 3 for the Thelon and Kazan Rivers, because it permits all uses and only provides for recommending that project proponents "consider the guidelines and criteria contained in the Heritage Rivers management plan." In our view, this Option does not best support the intent, objectives or policies NPC outlines for Encouraging Conservation Planning land use designations, does not provide adequate protection for caribou crossing sites along these two rivers, and in the case of the Thelon is inconsistent with its international status as a wilderness canoeing destination and NPC's own recommended Option for the Thelon Wildlife Sanctuary where most of the Thelon River is found. Further, we can see no compelling reason for providing less protection to the Thelon and Kazan than for the Soper Heritage River. Therefore WWF recommends that NPC recommend Option 1 for the Thelon and Kazan Heritage Rivers, namely, "Assign a designation that permits tourism, recreation and research, and prohibits all other uses."	General comment noted. The DNLUP has been revised.
WWF-23	World Wildlife Fund	14/02/2014	Option and Recommendations		EBSAs	Pg 18 - Recommended Option for Marine Habitat: Ecologically and Biologically Significant Areas (Figure 1) Option 2 is recommended as it supports the Goal of Protecting and Sustaining the Environment: "Assign a designation that permits all activities but with seasonal restrictions specific to each EBSA. For conforming and approved project proposals, provide a recommendation to regulators and proponents to consider potential impacts on wildlife and landscape values that must be considered outside of the seasonal restrictions. "This option requires site-specific assessments to be undertaken for each EBSA, which will take into account: The specific biological and ecological characteristics of each EBSA. The potential stressors on those significant characteristics. The risks of impacts from inappropriate activities. Site-specific mitigative measures, including seasonal and other restrictions WWF strongly recommends that these assessments be undertaken with some urgency, that they incorporate the best available scientific and traditional knowledge, and that they involve local interests. In light of the knowledge gaps that exist, a precautionary approach is required. Such an approach is needed to ensure that future conservation options are not foreclosed in areas that have been identified as ecologically or biologically significant. Furthermore, a precautionary approach helps to clearly identify knowledge gaps and generate a shared incentive to address these knowledge gaps, since it holds out the possibility of relaxing restrictions once the area is better understood.	The Implementation Strategy of the Plan contains a section on research priorities that would support future land use planning decisions.
WWF-24	World Wildlife Fund	14/02/2014	Option and Recommendations		Polynyas	WWF recommends that all polynyas be zoned for protection and we propose the option that follows: Recommended Options for Polynyas (Figure 1). Option 2 is recommended as it best supports the Goal of Protecting and Sustaining the Environment. Assign a designation with seasonal restrictions & prohibits installation of year-round infrastructure. The seasonal restrictions would apply to mineral exploration, development and operations activities so as to prevent disturbance to wildlife species using Polynya for breathing, resting and foraging. The seasonal restriction would extend from freeze-up to break-up - when polynyas form and disintegrate.	Comment addressed above. The revised DNLUP has taken this into account.
WWF-25	World Wildlife Fund	14/02/2014	Option and Recommendations		Polar Bear	Recommended Option for Maternal Terrestrial Polar Bear Denning Areas. Option 2 is recommended as it best supports the Goal of Protecting and Sustaining the Environment. Assign a designation that permits all activities but with seasonal restrictions. For conforming and approved project proposals, provide a recommendation to regulators and proponents that potential impacts on the wildlife and landscape values must be considered outside of the seasonal restrictions. Option 2. Assign a designation that permits all activities but with seasonal restrictions. For conforming and approved project proposals, provide a recommendation to regulators and proponents to consider potential impacts on the wildlife and landscape values that must be considered outside of the seasonal restrictions. Recommended Restrictions: All activities are prohibited in known polar bear denning habitat during the main denning period; dates to be set regionally using Inuit knowledge and scientific research. Research during denning period limited to studies that directly address wildlife or ecological issues.	The revised DNLUP has taken this into account. NPC could consider seasonal restrictions but dates are required. Polar Bear Denning Areas have been addressed in the Plan.
WWF-26	World Wildlife Fund	14/02/2014	Option and Recommendations		Polar Bear	Pg 28 - Recommended Option for Polar Bear Summer Retreat Habitat. Option 2 is recommended as it best supports the Goal of Protecting and Sustaining the Environment. Assign a designation that permits all activities but with seasonal restrictions. For conforming and approved project proposals, provide a recommendation to regulators and proponents that potential impacts on the wildlife and landscape values must be considered outside of the seasonal restrictions.	Timelines are required for the Plan to implement seasonal restrictions.
WWF-27	World Wildlife Fund	14/02/2014	Option and Recommendations		Polar Bear	Pg 29 - Recommended Option for Polar Bear Sea Ice Habitat. Option 3 is recommended as it best supports the Goal of Protecting and Sustaining the Environment while considering economic development. Assign a designation that permits all uses. For conforming and approved project proposals, provide a recommendation to regulators and proponents that potential impacts on the wildlife and landscape values must be considered. Option 3. Assign a designation that permits all uses. For conforming and approved project proposals, provide a recommendation to regulators and proponents that potential impacts on the wildlife and landscape values must be considered.	At this time Polar Baer Denning is the only area being considered for Special Management. One of the underlying themes of that review was the need for planning partners to maintain realistic expectations if there is desire to have a 1st generation land use plan in place in a timely manner. The comments are appreciated however only certain issues are being addressed at this time. The specific issues are outlined in the plan.
WWF-28	World Wildlife Fund	14/02/2014	Option and Recommendations		Archipelago	Pg 36 - it is best to take a precautionary approach, and as recommended in the Arctic Biodiversity Assessment of the Arctic Council's working group on Conservation of Arctic Flora and Fauna: "Develop and implement mechanisms that best safeguard Arctic biodiversity under changing environmental conditions, such as loss of sea ice, glaciers and permafrost. a) Safeguard areas in the northern parts of the Arctic where high Arctic species have a relatively greater chance to survive for climatic or geographical reasons, such as certain islands and mountainous areas, which can act as a refuge for unique biodiversity. b) Maintain functional connectivity within and between protected areas in order to protect ecosystem resilience and facilitate adaptation to climate change."	Terms of a land use plan typically need to clear and defensible. The land use plan could implement "mechanisms" but they first need to be developed and provided to the NPC for consideration.



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WWF-29	World Wildlife Fund	14/02/2014	DNLUP	Schedule B	Archipelago	Pg 36 - WWF agrees with the Protecting and Sustaining Environment (PSE) designations for the PSE-R1 (Key Bird Habitat Sites) and PSE-R2 (Historic Peary caribou calving and migration routes) that have been applied in the Archipelago region. But the recommendation for the PSE designation should be strong and require that project proposals "must" take into account impacts on birds and caribou.	General comment noted. The recommendations have been changed to address this concern.
WWF-30	World Wildlife Fund	14/02/2014	DNLUP	Schedule B	Archipelago	WWF agrees with the Building Healthy Communities (BHC) recommendations BHC-R2 (traditional lands) and BHC-R4 (Eureka) in the Archipelago region. In particular the BHC-R2 designation recognizes the historic and current importance of sea ice and marine ecosystems to Inuit culture, traditions transportation, and community health.	General comment noted.
WWF-31	World Wildlife Fund	14/02/2014	DNLUP	Schedule B	Archipelago, ESED	WWF agrees with the Encouraging Sustainable Economic Development (ESED) recommendations ESED-R1 (potential fisheries) in Jones Sound but does not agree with the ESED-R1 (potential fisheries) in Greely Fiord and Archer Fiord of the Archipelago region. The ESED-R1 areas in Jones Sound present an important opportunity for Grise Fiord to develop a local, sustainable fishing industry. But the ESED-R1 areas in Greely and Archer Fiords should be revisited. Arctic char at extreme latitudes do not grow as quickly and are not as productive as stocks further south. It is possible that a fishery there could easily deplete the stocks if exploited.	General comment noted.
WWF-32	World Wildlife Fund	14/02/2014	DNLUP		Archipelago, ESED	WWF agrees with the Encouraging Sustainable Economic Development (ESED) designation for the oil and gas significant discovery licences. These licences are located primarily on land, as such, significantly reduce the development and operational risks to the marine environment and when appropriate mitigation measures are in place to limit the impacts to the terrestrial environment. But it is essential that appropriate measures are taken to protect the marine environment, as there will be considerable shipping activity associated with the development and operation of any of these licences.	General comment noted.
WWF-33	World Wildlife Fund	14/02/2014	Option and Recommendations		Archipelago	WWF does not agree that all of the marine waters of the Archipelago should be designated Mixed Use. Mixed Use permits all uses and does not identify the important wildlife habitat that is present in the Archipelago. WWF feels that it is a critical to take a more precautionary approach by identifying and designating important habitat now, before development pressures intensify.	The DNLUP has been revised to consider marine environments.
WWF-34	World Wildlife Fund	14/02/2014	Option and Recommendations		Archipelago	The Arctic Archipelago is region rich with natural capital: the sea ice ecosystem, wildlife and non-renewable resources (oil and gas). The Nunavut Land Use Plan must recognize the uniqueness, sensitivity and global importance of the Archipelago and through land use zoning set the course for responsible, sustainable development in the High Arctic. This will be in the long term interest of Nunavummiut and Canadians alike.	General comment noted. The Plan has been revised to incorporate information and data collected during the land use planning process. Decisions are made on the best available knowledge.
WWF-35	World Wildlife Fund	14/02/2014	Option and Recommendations		Archipelago	Recommended Option for Sea Ice Habitat of the Arctic Archipelago. Option 2 is recommended as it supports the Goal of Protecting and Sustaining the Environment: "Assign a designation that permits all activities but with seasonal geographic restrictions. For conforming and approved project proposals, provide a recommendation to regulators and proponents to consider potential impacts on wildlife and landscape values that must be considered outside of the seasonal restrictions." This option requires future research in the Arctic Archipelago to understand the multi-year sea ice ecosystems and prepare for future new activities. In particular, to develop appropriate mitigative measures for this High Arctic region, including seasonal and other restrictions. In light of the knowledge gaps that exist, a precautionary approach is required to ensure future options remain open. WWF strongly recommends that the research be undertaken in the near future and that scientific and traditional knowledge is collected. Furthermore, a precautionary approach helps to identify knowledge gaps and generate a shared incentive to address the gaps, since it holds out the possibility of relaxing restrictions once the area is better understood.	General comment noted. NPC is not a primary generator of research. The formulation of land use plans is mainly based on information provided by external experts.