

July 3, 2009

Sharon Ehaloak Executive Director Nunavut Planning Commission Cambridge Bay, NU

Via email: sehaloak@npc.nunavut.ca

Re: Project Proposal Form

Dear Sharon,

The Nunavut Impact Review Board (NIRB; the Board) recognizes the efforts being undertaken by the Nunavut Planning Commission (NPC; the Commission), Nunavut Tunngavik Incorporated, the Government of Nunavut and the Government of Canada to establish timelines and deliverables for the development of the Nunavut Land Use Plan (NLUP). NIRB would like to thank the Commission for seeking to engage the Board early in this development process.

In your letter dated May 21, 2009 you requested input on a preliminary draft application form intended to facilitate a one-window entry-point for project proposals under the NLUP. This form appears to align very closely with the NIRB's current *Part 1 Form*, and would likely meet NIRB's basic information requirements for most project proposals, subject to the provision of any additional information required by the Board's *Project Specific Information Requirements Form*, which is also indicated in the draft form developed by the Commission. Over the years, NIRB has found it useful to maintain a dialogue with the many agencies and organizations responsible for authorizing projects in Nunavut, to ensure that, where possible, the Board's forms reduce duplication and satisfy all stakeholders' information requirements. To this end, NIRB's forms have and will continue to change into the future. One recommendation the Board might offer is to date-version this application form, to make keeping it up-to-date more achievable, recognizing there may be a need to refine and adjust information requirements as development and related technologies continue to evolve in Nunavut. Additionally, NIRB would like to encourage the Commission to also maintain a regular dialogue with the Nunavut Water Board in this important initiative.

In the above-referenced letter, you also requested NIRB's input regarding identification of regulatory gaps and marine issues which the NLUP might address. It is the Board's hope that the pending legislation, once implemented, will help to correct the majority of currently recognized regulatory gaps and provide much-needed clarity for all stakeholders in Nunavut's regulatory system. Even so, one regulatory gap and marine issue that has been raised in recent discussions had by the Nunavut Marine Council, of which our respective organizations are member, is the apparent absence of regulatory triggers and authorizations for many land-based shipping activities in Nunavut, such as cruise ship tourism. Additionally, ice-breaking activities in the Nunavut Settlement Area or Outer Land Fast Ice Zone may require no Nunavut authorizations, but have the potential to impact negatively on the marine environment and Nunavummiut, through disruption to over-ice migration and travel routes, for example. NIRB hopes that, through the efforts of the Nunavut Marine Council, recommendations on these and other marine issues might more appropriately be made.

In closing, once again I would like to thank the Commission for allowing NIRB to become involved in the early development of the NLUP, and look forward to our continued engagement in this very important initiative.

Sincerely,

Stephanie Autut Executive Director

Nunavut Impact Review Board