



# Ghotlenene K' odtineh Dene



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September 24, 2019

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Nunavut Planning Commission  
P.O. Box 1797  
Iqaluit, Nunavut  
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**RE: Notice of Release of Draft Rules for Public Proceedings and Rules for Project Descriptions**

We have reviewed the documents provided on July 24, 2019 related to the above-noted matters.

Through our review of the draft Rules for Public Proceedings, we have the following comments for your consideration:

- We note that the definition of “Traditional Knowledge” under Rule 3 is exclusive to Inuit Qaujimagatuqangit. Notwithstanding the provisions for broad application and procedural fairness (Rule 4) and the treatment of oral evidence (Rule 24), there may be certain instances where this definition could limit a fair and reasonable consideration of Denesuline traditional knowledge. For example, the definition of Traditional Knowledge in Rule 16 could lead to the exclusion Denesuline traditional knowledge in meetings of technical experts and Traditional Knowledge experts. Another example is at Rule 15(4), where the statement “shall generally consider Traditional Knowledge as equal to scientific information” does not ensure that Denesuline traditional knowledge is also generally considered equal to scientific information.
- There do not appear to be any rules that would allow for Denesuline to participate in proceedings in their own language (Athapaskan).
- At Rules 19(1)(c) and 26(1)(c), the term “Parties entitled to standing as of right” is used. It may be appropriate to use the defined term “Entity with Right to Standing” in these Rules. We also note that “Parties” is not defined in the draft Rules for Public Proceedings or the *NuPPAA*, and as defined in the Nunavut Agreement only includes the Inuit and Canada.



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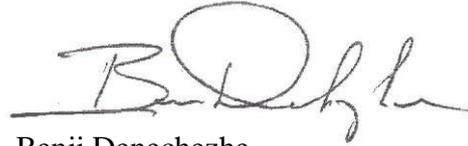
We have reviewed the draft Rules for Project Descriptions and have no comments at this time.

Should you have any questions, please do not hesitate to contact our technical advisor, Wayne Wysocki at (204) 430-4975 or by email at [ww.symbion@shawbiz.ca](mailto:ww.symbion@shawbiz.ca). We look forward to a response at your earliest convenience.

Masi cho,

-WJ VPC

Geoff Bussidor  
Chief Negotiator  
Sayisi Dene First Nation

A handwritten signature in black ink, appearing to read "Benji Denechezhe". The signature is written in a cursive style with a large, prominent initial "B".

Benji Denechezhe  
Chief Negotiator  
Northlands Denesuline First Nation