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Dene Né Né
Land Claim Negotiators



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September 24, 2019

By Email
submissions@nunavut.ca

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 Qaujimajatuqangit. 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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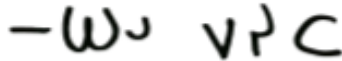


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We have reviewed the draft Rules for Project Descriptions and have no comments at this time.

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. We look forward to a response at your earliest convenience.

Masi cho,

Handwritten signature of Geoff Bussidor in black ink, appearing as '-WJ vpc'.

Geoff Bussidor
Chief Negotiator
Sayisi Dene First Nation

Handwritten signature of Benji Denechezhe in black ink, featuring a large circular loop at the top.

Benji Denechezhe
Chief Negotiator
Northlands Denesuline First Nation