



October 8, 2021

Mr. Andrew Nakashuk,  
Chair, and Commissioners  
Nunavut Planning Commission  
Box 1797 Iqaluit, NU X0A 0H0  
Via email : [submissions@nunavut.ca](mailto:submissions@nunavut.ca)

**Dear Mr. Nakashuk and Commissioners,**

I am writing as a representative of Nordgold, a gold mining and exploration company that has been conducting seasonal exploration activities near Whale Cove in the Kivalliq Region of Nunavut since 2016, through its Canadian subsidiary Northquest Ltd.

Nordgold previously participated in the 2016 Draft Nunavut Land Use Plan (DNLUP) review, and would once again like to submit comments for the consideration of the Commission.

While several iterations of the DNLUP have been circulated, commented on and ultimately re-drafted since 2009, we believe that the 2021 draft, and the process followed in its development, remain flawed. The process has clearly been too rushed to allow for meaningful consideration of the plan, and for the drafting of well thought out comments. Interested parties need time to analyze the document and to make sense of the very confusing maps, and to understand the long-term implications the land use designations will have on the natural, cultural and economic future for Nunavut and Nunavummiut.

The release of the DNLUP in mid-summer coincided with the period when many stakeholders are focused on other things. It is difficult to understand how communities, governments, and industry were supposed to consult and pull together coherent arguments during this slow time, and while serious concerns over the COVID pandemic represented a major impediment to getting business done. Many offices were closed and communications challenges made it difficult for stakeholders to develop a good understanding of the impacts of the plan. In addition, companies like Nordgold have been involved in intense exploration activities in Nunavut since the release of the draft plan, and company management have simply not had time to reflect on the plan and coordinate a meaningful response to it.

Though our perusal of the plan to date has been cursory, Nordgold is very concerned that once again, huge areas of restricted use appear to dominate the 2021 plan. In addition, the inadequate maps lend little clarity as to where the various restrictions are meant to apply.

While the recent plan appears to leave a lot of questions unanswered, what is very clear is that the drafters of the plan are not welcoming exploration and mining investment in the territory, which is a sentiment that I believe is not shared by most Nunavummiut.

Nordgold submits that this plan, and the process it continues to follow, should not be allowed to proceed.

Respectfully,

DocuSigned by:

*David Smith*

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**David Smith**  
**Exploration Manager, Canada**

Cc: NWT & NU Chamber of Mines