



January 24th, 2023

Nunavut Planning Commission  
Box 1797, Iqaluit, Nunavut, X0A 0H0  
Via email [submissions@nunavut.ca](mailto:submissions@nunavut.ca)

**RE: Comments on the Draft Nunavut Land Use Plan and Marine Shipping Activities**

1. Please accept the following comments submitted on behalf of The NEAS Group, including Nunavut Eastern Arctic Shipping Inc., an "Inuit Firm" registered on the Nunavut Tunngavik Inc. (NTI) Article 24 maintained list under the Nunavut Agreement.
2. The NEAS Group supports the clear intent of the Draft Nunavut Land Use Plan to exclude and exempt all sealift operations, vessel traffic and shipping activities from restrictions, along with emergency rescue. The clear intent of the Nunavut Land Use Plan should be enhanced in plain language to ensure that proposals do not restrict or encumber the annual summer sealift and dry cargo marine resupply operations.
3. Overall, The NEAS Group urges the Nunavut Planning Commission to increase the immediate importance and high priority in the Draft Nunavut Land Use Plan for marine landing areas in each local community. Specifically, to ensure sufficient lands are set aside above the high-water mark in each community for safe and secure marine work areas with marine infrastructure development scalable to sustainable local growth.
4. Based on the high socio-economic importance of summer sealift operations, consider marine infrastructure's environmental and cultural importance high for each community's marine landing areas. Marine transportation provides local communities with the most environmental and cost-effective means to move goods to Nunavut. The annual summer sealift is part of local community resupply traditions.
5. Sufficient lands in each community are required to develop safe and secure marine landing areas, with communications, from existing occasional use marine work areas to heavy marine and intermodal infrastructure. Maritime shipping corridors and navigation routes necessitate priority improvements in local marine landing areas, including intermodal infrastructure that facilitates reliable movements of goods and provisions of services.

6. The limited "linear" infrastructure model underlying some of the Draft Nunavut Land Use Plan can be expanded and replaced with more accepted and locally applicable intermodal transportation models. The Draft Nunavut Land Use Plan often refers to the high-priority needs of marine development for local communities but, inexplicably, prioritizes higher-profile aerodrome developments. The Draft Nunavut Land Use Plan needs to increase the priority for low-profile but critically important and high-impact local marine landing areas and infrastructure. Although often overlooked, priority marine infrastructure planning is essential for sustainable local economic growth and quality of life improvements.

7. NEAS reliably delivers dry cargo marine resupply services for every Nunavut community and destination across the Qikiqtaaluk, Kivalliq, Kitikmeot, including the Iqaluit Region and the Port of Churchill, Manitoba. NEAS vessels navigate the Northwest Passage and service all Western Arctic coastal communities from the NEAS arctic gateway at Bécancour, Québec, including the NEAS Cargo Service Centre and Marine Terminal.

8. Thank you and continued success to the Nunavut Planning Commission with the Draft Nunavut Land Use Plan.

Regards,



Suzanne Paquin  
President & Chief Executive Officer