



February 24, 2023

Nunavut Planning Commission
Executive Director Sharon Ehaloak
PO Box 1797
Iqaluit, NU XOA OHO

Re: Agnico Eagle's High-Level Response to Final Written Comments Submitted to the 2021 Draft Nunavut Land Use Plan

Dear Ms. Ehaloak,

As outlined in the Nunavut Planning Commission's (NPC) notice of November 23, 2022, Table 1 provides some of our high-level comments to some of the submissions received on the 2021 DNLUP, using the template requested by the NPC. At least 47 final submissions were filed on or before February 10, 2023. Many of these submissions include volumes of new evidence, legal opinions, and/or significant changes in position from previous submissions.

This submission should not be considered complete as it is based on only a high level, summary review of some of the materials filed. The two-week time period unfortunately has not allowed sufficient time for a thorough review and analysis of potential impacts of positions taken in the final written submissions on existing rights, among other topics. On this note, Agnico Eagle clarifies that lack of comment on any final submission or other materials filed by February 10 should not be taken as agreement with positions taken in those documents. At this time, with additional evidence that has been provided and the short timeline for a complete review, we feel there is less clarity and certainty related to existing rights related to our land tenure and future mining exploration in Nunavut. More engagement opportunities for participants are required before the NPC should move to the DNLUP revision stage and submission of a revised draft to the signatories to ensure there is a balanced approach.

As an example, Agnico Eagle read of the proposal to potentially establish conservation areas on Inuit Owned Lands with great interest. It is not clear how this proposal would interact with conformity determinations, or how it would protect existing rights to explore, develop and access mineral claims. Significant additional consultation with Inuit and stakeholders (including Agnico Eagle) would be required before this approach should be reflected in a draft land use plan. Agnico Eagle remains of the view that the Option 4 approach presents the most balanced way forward for a first-generation land use plan.

We appreciate NPC's willingness to engage in dialogue as all parties move towards a NLUP that supports communities, responsible resource development and the goals and objectives of the Nunavut Agreement. Agnico Eagle is committed to doing our part to achieve these goals as well.

Sincerely,

Jamie Quesnel
Director, Permitting & Regulatory Affairs
Agnico Eagle Mines Limited

Table 1: Agnico Eagle's Responses and Comments to Final Written Comment Submissions

IDENTIFICATION	
Date	February 24, 2023
Your Name:	Jamie Quesnel
Your Title/Position	Director, Permitting and Regulatory Affairs
Your organization (if applicable):	Agnico Eagle Mines Limited
Your Contact information (email, Tel, mail, or fax):	jamie.quesnel@agnicoeagle.com

	NPC REGISTRY FILE #	SECTION OF THE SUBMISSION	RESPONSE/COMMENT
Kivalliq Inuit Association			
1	21-209E	Section 2 (pg. 6)	Agnico Eagle appreciates the KivIA's efforts to quantify the potential negative economic effects if mining and exploration is restricted in the Kivalliq Region. Given the time available, we have not been able to validate these numbers, but it does show the significant potential economic benefits in some areas that do not have any current mineral tenures. The NLUP should give proper weight to this potential and in addition to protecting the right to explore and develop existing mineral tenures, give due consideration to ensuring the NLUP does not prevent new discoveries from being made in the future.
2	21-209E	Section 2 (pg. 7)	"Option 4" should apply to both IOL and Crown lands included in the NLUP, which would permit mineral exploration and development project proposals (including any linear, marine or other access) to conform to the plan and to proceed to the NIRB process, with special consideration given to the areas identified in the NLUP during the environmental assessment. Any approaches which result in restrictions to mineral exploration or development proposals moving to the NIRB process do not provide the necessary certainty for protection of existing rights.
3	21-209E	Section 2 (pg. 7)	Areas designated as Limited Use (both IOL and Crown) have not been subject to the level of analysis that is required to inform Inuit of the cost and benefit of the land designation proposals included in the DNLUP. This is not just an issue on IOL – Inuit also benefit from projects on Crown lands, and most projects in Nunavut are located on a mix of IOL and Crown. The relatively small amount of land that has been taken up by Agnico Eagle's projects ultimately contributes 25% of Nunavut's GDP. As illustrated in Agnico Eagle's previous submissions to NPC, mining and exploration can proceed in a manner that coexists with caribou.
4	21-209E	Section 2 (pg. 7)	Conservation areas should be established in accordance with Government of Canada laws and the applicable sections of the Nunavut Agreement and should not be established by a land use plan before legal process steps required by federal laws have been completed. There is a concern that this approach could negatively impact on existing rights to explore, access and develop mineral tenures. This appears to be a new proposal included in final written submission, and as it has not been subject to the appropriate rigor via the NPC process, it should not be carried forward into any draft presented to signatories.

	NPC REGISTRY FILE #	SECTION OF THE SUBMISSION	RESPONSE/COMMENT
5	21-209E	Section 3 (pg. 8-11)	<p>Agnico Eagle continues to be of view that there is not sufficient consensus on the data provided to NPC to date to support the establishment of map-based prohibition zones as proposed in the 2021 DNLUP.</p> <p>The establishment of any such areas based on caribou habitat should be left to a future iteration of the NLUP, after a multi-disciplinary committee is struck involving knowledge holders, Inuit organizations, Canada, Nunavut, and industry representatives, which can provide better consensus recommendations to NPC.</p> <p>In the meantime, the areas that have been identified can be identified as areas of special interest utilizing the “Option 4” approach and will be given consideration as part of the NIRB process.</p> <p>In addition, Agnico Eagle acknowledges the mobile protection measures which were developed to apply to exploration activities, and also requests that due consideration and weight should be given to the more comprehensive, site-specific caribou protection plans that are developed for production mines in Nunavut through collaboration with knowledge holders and other experts via the NIRB process and post assessment mechanisms such as the Elders Committees and Terrestrial Advisory Groups.</p>
Joint NTI-RIA			
6	21-189E	2.6.3 (pg. 25-26)	<p>The approach to existing rights put forward by the joint RIA-DIO submission presents unacceptable risk and uncertainty to protection of rights of mineral tenure holders to explore, access and develop their mineral claims. There has not been sufficient time allotted within this two-week comment period to properly review and respond to new and technical evidence such as the OKT legal opinion that was provided with some Final Written Comments on February 10, 2023. Lack of comment should not be taken as agreement with its analysis or conclusions. Agnico Eagle continues to emphasize that the balanced path forward on existing rights would incorporate the Option 4 approach, which permits tenure holders to access the NIRB process but does not guarantee that any project proposal would be permitted to proceed.</p>
Government of Nunavut			
7	21-192E	GN-2023-01	<p>Agnico Eagle continues to be of view that there is not sufficient consensus on the data provided to NPC to date to support the establishment of map-based prohibition zones as proposed in the 2021 DNLUP.</p> <p>The establishment of any such areas based on caribou habitat should be left to a future iteration of the NLUP, after a multi-disciplinary committee is struck involving knowledge holders, Inuit organizations, Canada, Nunavut, and industry representatives, which can provide better consensus recommendations to NPC.</p> <p>In the meantime, the areas that have been identified can be identified as areas of special interest utilizing the “Option 4” approach, and will be given consideration as part of the NIRB process.</p> <p>In addition, Agnico Eagle acknowledges the mobile protection measures which were developed to apply to exploration activities, and also requests that due consideration and weight should be given to the more comprehensive, site-specific caribou protection plans that are developed for production mines in Nunavut through collaboration with knowledge holders and other experts via the NIRB process and post assessment mechanisms such as the Elders Committees and Terrestrial Advisory Group.</p>

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8	21-192E	GN-2023-03	The “Option 4” approach, which would require all applications relating to mineral tenures to proceed to the NIRB process, taking into account the values identified in the NLUP, would provide a more simple approach that accomplishes the goals of Nunavut’s recommendations. An exemption approach, as proposed by Nunavut, does not provide sufficient protection of existing rights.
Government of Canada			
9	21-201E	Section 3 (pg. 4)	It is important to avoid incompatibility in land management between Crown lands and IOL and Agnico Eagle understands from the Government of Canada’s submission that conversations on this crucial topic are continuing. Given the relevance of these conversations to existing rights (which includes access to those rights), and the significant investment made in Nunavut by Agnico Eagle to date, the outcome of these conversations should be shared with participants and participants should be given an opportunity within the NPC process to review and respond to any resulting proposals before the NLUP is revised and shared with the signatories.
10	21-201E	Section 5 (pg. 4)	Agnico Eagle understands from the Government of Canada’s submission that such conversations are continuing. Given the relevance of these conversations to existing rights, the outcome of these conversations should be shared with participants and participants should be given an opportunity to review and respond to any resulting proposals before the NLUP is revised and shared with the signatories.
11	21-201E	Section 6.1 (pg. 5-6)	Agnico Eagle’s view is that access to existing mineral rights must be considered to be part of that right. Adding subjective criteria as suggested by the Government of Canada reduces clarity as to whether a proposed access route would be in conformity with the plan or not. The criteria listed by the Government of Canada would all be considered at the Nunavut Impact Review Board environmental assessment. Access to mineral tenures should not be prohibited from moving to the environmental assessment stage by the land use plan. Linear development and marine access goes hand in hand with exploration and development of mineral tenures, or the resource risks being stranded. As emphasized in Agnico Eagle’s submission of Feb. 10, 2023, stranded assets could be subject to legal action and compensation for expropriation. However, in a first generation land use plan our view is that the better approach is “Option 4”.
12	21-201E	Section 7 (pg. 9)	Agnico Eagle confirms that in the event it considers a shipping option that would require icebreaking, it would consult with communities and be prepared to provide evidence of community engagement on icebreaking activities as part of its project proposal.
13	21-201E	Section 7 (pg. 9)	Per the Government of Canada comments, the identification of critical habitat and management measures for Peary caribou (COSEWIC 2022) and Dolphin & Union caribou (COSEWIC 2018) has already occurred. These documents were drafted with a diverse set of planning partners including the GoC, GN, Nunavut Wildlife Management Board, Kitikmeot Regional Wildlife Board, Nunavut Tunngavik Inc., the Hunters and Trappers Organizations and Hunters and Trappers Committees, GNWT, Wildlife Management Advisory Council (NWT), Inuvialuit Game Council. Any additional prohibitions provided by the NPC risk repeating or confusing existing management.

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			<p>Moreover, the proposed prohibition approach limits the ability to incorporate IQ, species biology and economic factors in project proposals. Ice breaking can be conducted responsibly and in accordance with best practices set by COSEWIC and their planning partners, and communities.</p> <p>The “Option 4” approach will help ensure that project proposals pay close attention to the areas that are important to the communities, and support a better environmental assessment at the NIRB stage. This is a balanced approach that is appropriate for a first generation land use plan.</p> <p>References:</p> <p>COSEWIC 2022. Recovery Strategy for the Peary Caribou (<i>Rangifer tarandus pearyi</i>) in Canada (2022-09-29)</p> <p>COSEWIC 2018. Management Plan for the Dolphin and Union Caribou (<i>Rangifer tarandus groenlandicus</i>) in Canada: Adoption of the Management Plan for the Dolphin and Union Caribou (<i>Rangifer tarandus groenlandicus x pearyi</i>) in the Northwest Territories and Nunavut (2018-03-29)</p>
14	21-201E	Section 8 (pg. 11-12)	<p>Agnico Eagle does not agree with map-based prohibitions for caribou habitat.</p> <p>The establishment of any such areas based on caribou habitat should be left to a future iteration of the NLUP, after a multi-disciplinary committee is struck involving knowledge holders, Inuit organizations, Canada, Nunavut, and industry representatives, which can provide better consensus recommendations to NPC.</p> <p>In the meantime, the areas that have been identified can be identified as areas of special interest utilizing the “Option 4” approach, and will be given consideration as part of the NIRB process.</p>
15	21-201E	Annex A (pg. 14)	<p>Areas with existing mineral tenure should be rezoned as per Option 4 that states that any project proposal to explore or develop such tenures (including any access required) will be permitted to proceed to NIRB even in the event they overlap with prohibited areas. Government of Canada has provided clear evidence that there has been no “staking rush”. Agnico Eagle agrees that all mineral tenures in existence at the time the first generation land use plan is signed should be included, not only those that possess existing regulatory approvals.</p>
16	21-201E	Annex A (pg. 16)	<p>If Option 4 approach is not implemented, the approach reflected in many submissions would have the unintended effect of discouraging future exploration. Nunavut is an underexplored territory, and as demonstrated by the Government of Canada, investment is challenged at this time. Much of the investment in current tenures relate to keeping existing projects running, not identifying new discoveries. Parties should not lose sight of the significant negative impact of some of these proposal on Nunavut’s socio-economic future.</p>

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	Athabasca Denesuline Né Né Land Corporation		
17	21-177E	Section 3 (pg. 4)	<p>Actual research conducted by the Bathurst Caribou Range Plan (BCRP) indicates that population-level effects on caribou due to disturbance from anthropogenic effects are very small. Research does not support the conclusion that mobile protection measures are ineffective.</p> <p>The Bathurst caribou declined from approximately 200,000 females to 16,400 females between 1986 and 2009. Research by biologists from the government of Northwest Territories (GNWT) indicates that this decline was due to a fixed over-harvest on the herd, likely between 3,000 and 8,000 females per year (Boulanger et. Al. 2011). This led to the removal of 10-30% of the breeding females per year by 2009 (Boulanger et. Al. 2011). There are systems in Nunavut to regulate hunting that are different from systems in NWT. As an example, in Nunavut, this is a shared responsibility between Nunavut, the Wildlife Boards, and Hunters and Trappers Organizations.</p> <p>The BCRP evaluated the relative effects of harvest and anthropogenic disturbance on caribou populations using the CARMA model (BCRP, Appendix D). Changes in harvest rate had a large influence on the population growth rate of the herd, while disturbance due to settlements, winter roads, transmission lines and industry had a small effect on the population - with a 1% difference in population growth between a scenario with no development and a scenario with high development. Note that most of the disturbance to caribou in this model (72%) of this disturbance is due to settlements, winter roads, the highway and powerlines and the minority is due to industry and their winter access roads (28%).</p> <p>Agnico Eagle acknowledges the mobile protection measures which were developed to apply to exploration activities, and also requests that due consideration and weight should be given to the more comprehensive, site-specific caribou protection plans that are developed for production mines in Nunavut through collaboration with knowledge holders and other experts via the NIRB process and post assessment mechanisms such as the Elders Committees and Terrestrial Advisory Group. These plans also are included as part of the enforceable Project Certificate.</p> <p>Areas with existing mineral tenure should therefore be rezoned as per Option 4 that states that any project proposal to explore or develop such tenures (including any access required) will be permitted to proceed to NIRB even in the event they overlap with prohibited areas.</p> <p>References:</p> <p>Boulanger J, A Gunn, J Adamczewski, B Croft. 2011. A Data-Driven Demographic Model to Explore the Decline of the Bathurst Caribou Herd. J Wild Manage. 75(4):883-898</p> <p>GNWT. 2019. The Bathurst Caribou Range Plan, Appendix D. Methods and Summary of Key Results for Bathurst Caribou Range Plan using the CircumArctic Rangifer Monitoring and Assessment (CARMA) Integrated Caribou Model.</p>
18	21-177E	Section 3 (pg. 4)	<p>There are no developments in the calving grounds of barrenland caribou in Canada – in Yukon, NWT, NU or northern Quebec - so there is no evidence of industrial effects on caribou calving to draw a conclusion from in Canada.</p> <p>However, the Prudhoe Bay oil and gas fields were developed in the calving grounds of the Central Arctic Herd in Alaska starting in the 1960s and continues today. During this period, the herd increased in number from approximately 5,000 in 1978, approximately 30,000 throughout the 1990s, climbed to a peak of 68,000 in 2010 and is considered stable again at</p>

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			<p>30,000 in 2019. Researchers report that caribou avoid oil field infrastructure by approximately 5 km during calving, 2 km during post-calving and 1 km during the mosquito harassment period, and are likely not habituating to these features (Johnson et. Al. 2019). Other researchers have reported local scale effects of avoidance and altered movement near oil field infrastructure. Despite these local-scale effects, the population has grown since the oil field was installed and is considered healthy by the Alaska Department of Fish and Game.</p> <p>Likewise, monitoring programs at mines in Nunavut report that caribou in the summer and winter avoid mines such as Hope Bay by approximately 2 km. Studies at Meadowbank show that while caribou may hesitate to cross roads (a local scale effect) they continue to reach calving grounds and calve successfully, in a similar way to caribou who have not been exposed to roads (Golder 2020).</p> <p>Agnico Eagle acknowledges the mobile protection measures which were developed to apply to exploration activities, and also requests that due consideration and weight should be given to the more comprehensive, site-specific caribou protection plans that are developed for production mines in Nunavut through collaboration with knowledge holders and other experts via the NIRB process and post assessment mechanisms such as the Elders Committees and Terrestrial Advisory Group. These plans also are included as part of the enforceable Project Certificate.</p> <p>Areas with existing mineral tenure should therefore be rezoned as per Option 4 that states that any project proposal to explore or develop such tenures (including any access required) will be permitted to proceed to NIRB even in the event they overlap with prohibited areas.</p> <p>References:</p> <p>Golder. 2020. Lorillard Collared Caribou Movements; Implications from Interacting with the Whale Tail Haul Road and All-Weather Access Road.</p> <p>Johnson H, T Golden, L Adams, D Gustine, E Lenart. 2019. Caribou Use of Habitat Near Energy Development in Arctic Alaska. J Wild Manage. 84(3):401-412</p> <p>https://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/central_arctic_herd/cah_newsletter_summer_2020.pdf</p>
Kitikmeot Regional Wildlife Board			
19	21-202E	pg.1-2	<p>In the wildlife monitoring and mitigation plans in place at Agnico Eagle's mines, we take great care to incorporate community voices. As an example, we include Hunters and Trappers Organizations in our terrestrial advisory groups at Meliadine and Meadowbank and we have a stand-alone Elders Committee that advises us at Hope Bay. Throughout the years we have adjusted our wildlife plan based on comments received by the HTO and Elders Committee. For example, at Meliadine we are now removing the flags alongside the road prior to caribou migration based on concerns heard. We have also committed to cover the waterline to be built along the Meliadine All Weather Access Road.</p> <p>Agnico Eagle acknowledges the mobile protection measures which were developed to apply to exploration activities, and also requests that due consideration and weight should be given to the more comprehensive, site-specific caribou protection plans that are developed for production mines in Nunavut through collaboration with knowledge holders and other experts via the</p>

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			<p>NIRB process and post assessment mechanisms such as the Elders Committees and Terrestrial Advisory Group. These plans also are included as part of the enforceable Project Certificate.</p> <p>Areas with existing mineral tenure should therefore be rezoned as per Option 4 that states that any project proposal to explore or develop such tenures (including any access required) will be permitted to proceed to NIRB even in the event they overlap with prohibited areas.</p>
	BQCMB		
20	21-199E	pg.2	<p>It is not Agnico Eagle's position that development should have higher priority over caribou in the NLUP. At our projects, caribou have the right of way. The NLUP does not provide approval for mineral exploration and development. In order to successfully obtain approval from the NIRB, all proponents will need to show that their project can co-exist with caribou. Not every project is approved by NIRB. For projects within areas that are designated as sensitive for caribou by the NLUP, proponents will have a particularly high standard to meet.</p>
21	21-199E	Attachment A	<p>Projects with existing mineral rights would not be granted any right to proceed through all stages of mineral development by the NLUP. This does not accurately reflect the proposals before the NPC. The proposal is that mineral exploration and development (and access routes) would conform to the land use plan and granted the opportunity to move to the NIRB and regulatory permitting phase. The NLUP would ensure protection through Option 4.</p> <p>Agnico Eagle again respectfully emphasizes its concerns regarding the accuracy of the information that has been used to designate caribou areas in the 2021 DNLUP.</p>
22	21-199E	Attachment A	<p>Agnico Eagle does not implement only mobile protection measures or seasonal restrictions to protect caribou. As stated in Agnico Eagle's final submission of February 10, 2023, a very small portion of lands are taken up compared to the overall lands available to caribou. Using the Meliadine mine as an example, the actual mine footprint is approximately 1% of the area of the mineral claim. The areas of these mines would amount to 0.039% of the 88,113 km² post-calving area. This is a very small area and a small proportion of the post-calving range and is extremely unlikely to affect caribou populations.</p> <p>Agnico Eagle also does not rely completely on the environmental assessment process. Our approach to caribou protection is constantly evolving based on monitoring results as well as the collaboration through our Elders Group and Terrestrial Advisory Groups, which include the Kivalliq Inuit Association, hunters and trappers organizations, and territorial representatives among its members.</p>
23	21-199E	Attachment B	<p>Mobile protection measures are applicable to exploration activities and are regularly updated. They are not a static approach that predates the NIRB process, as suggested by the submission.</p> <ul style="list-style-type: none"> The concept of mobile protection measures began in 1978 with the original Beverly Qamanirjuaq Caribou Protection Measures (DIAND 1978) that were applied to exploration activities. Gunn et. Al. (2007) reviewed the effectiveness of these measures for the period of 1980 and 2006 and found them to be an effective management tool for the calving and post-calving periods.

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			<ul style="list-style-type: none"> • The Government of Nunavut's Caribou Strategy Framework (GN DOE 2010) identified calving grounds as a sensitive habitat and recommended to develop and test mobile caribou protection measures based on satellite telemetry. • In 2004 and again in 2014, the Beverly and Qamanirjuaq Caribou Management Board recommended that the caribou protection measures should be updated and that mobile protection measures be considered as part of the measures. • In 2015, the Kivalliq Inuit Association submitted comments on the 2016 Draft Nunavut Land Use Plan (DNLUP) that included a review and a proposal for updated mobile protection measures to the Nunavut Planning Commission (NPC) (Gunn and Poole, 2015). • Likewise, in 2017, the Kitikmeot Inuit Association submitted comments on the 2016 DNLUP that included a 2016 KitlA resolution to support the development of mobile protection measures for caribou (KitlA 2017, Appendix A). • The 2019 Bathurst Caribou Range Plan includes mobile protection measures (GNWT 2019; Section 3.2.3) as one of seven management strategies for caribou in calving and post-calving areas. <p>As noted above, Agnico Eagle applies caribou protection measures to its exploration activities, and develops more comprehensive measures applicable to production mining through the NIRB approval and monitoring process.</p> <p>References:</p> <p>BQCMB 2004. Protecting calving grounds, post-calving areas and other important habitats for Beverly and Qamanirjuaq caribou. A position paper by the Beverly and Qamanirjuaq Caribou Management Board, Stonewall, MB.</p> <p>BQCMB. 2014. Beverly and Qamanirjuaq caribou management plan 2013-2022. Beverly and Qamanirjuaq Caribou Management Board, Stonewall, MB.</p> <p>KitlA. 2017. Supplemental Information on Caribou. Kitikmeot Inuit Association. Final Hearing Written Submission for the 2016 Draft Nunavut Land Use Plan, January 13, 2017.</p> <p>GN DOE. 2010. Draft Nunavut Caribou Strategy Framework; March 2010</p> <p>GNWT. 2019. The Bathurst Caribou Range Plan.</p> <p>Gunn A, K Poole, J Wierzchowski, M Campbell. 2007. Assessment of Caribou Protection Measures; Submitted in fulfillment of NCR # 830359. Indian and Northern Affairs Canada, Gatineau, Québec</p> <p>Pool K, A Gunn. 2015. Mobile Caribou Conservation Measures for the Kivalliq Region, Nunavut; Draft report for Kivalliq Inuit Association</p>
24	21-199E	Attachment C	<p>The NLUP must adopt a balanced approach that considers the economic wellbeing of Nunavummiut and the environment.</p> <p>In Agnico Eagle's October 2021 submission, we examined how much habitat would be taken up if we built a mine in each of our groups of mineral claims in the post-calving area of the Qamanirjuaq herd, for illustrative purposes (Agnico Eagle has no intention of building mines in these areas at this time). Using the Meliadine mine as an example, the actual mine footprint is approximately 1% of the area of the mineral claim. The areas of these mines would amount to 0.039% of the 88,113 km²</p>

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			<p>post-calving area. This is a very small area and a small proportion of the post-calving range which is extremely unlikely to affect caribou populations – particularly given the 25% contribution to Nunavut's GDP provided by these areas.</p> <p>Given the small areas of habitat that are actually taken up by development, or could be in future, great care should be taken in the NLUP to a balanced approach that does not reflect widespread prohibitions. Option 4 offers a workable path forward for the NLUP that could provide the necessary balance and support better economic stability in Nunavut for the long term.</p>
	General Comments		
25	21-195E 21-198E 21-191E 21-178E		<p>Option 4 has the support of many participants in the DNLUP process. In particular, we note that this Option was explicitly referenced in final submissions from the Chamber of Mines, Sabina Gold & Silver, Baffinland Iron Mines Corporation, De Beers, and others.</p>