



Appendix B

The Kitikmeot Inuit Association has reviewed the Post-Hearing final written submissions that have been posted on the Nunavut Planning Commission public registry for the 2021 draft Nunavut Land Use Plan. We are taking this opportunity to identify questions and/or comments for which we require clarifications. We hope and welcome all the clarifications that the Parties can provide.

To: Government of Nunavut	
Subject: Caribou – Prohibited Uses	
Reference to Final Written Submission: Page 5	<p>“The GN has sufficient data to support these delineations and is confident in their boundaries, but also recognises the knowledge of other parties.”</p> <p>and,</p> <p>“The GN will continue to work with its co-management and planning partners to identify caribou habitat and other areas for protection as additional information is gathered”</p>
Comment / Question #1	<p>We presume that the GN is aware of several of the reports that address caribou calving ground delineations that have been submitted to the NPC, many of which criticize the GN’s analyses and delineations. Can the GN respond to the criticisms in those reports? Can the GN provide specific scientific/technical reasons for rejecting (1) other approaches to delineating calving areas, and (2) approaches other than area protection of historically used calving grounds.</p>

Comment / Question #2	Can the GN speak to why it continues to advocate for its methodology, analyses and delineations instead of considering alternate approaches? Why do their approach and delineations merit recognition over and above the approaches proposed by other parties?
Importance of the question to the Nunavut Land Use Plan Process	Several Parties have regularly or consistently questioned the GN's approach to, analysis, and delineations of caribou calving ground, yet those delineations remain the basis of the draft Nunavut Land Use Plan Limited Use designations aimed at protecting caribou. The responses to these questions may help determine the appropriateness of those delineations.

To: Government of Nunavut	
Subject: Caribou – Prohibited Uses	
Reference to Final Written Submission: Page 5	<p>“The GN has sufficient data to support these delineations and is confident in their boundaries, but also recognises the knowledge of other parties.”</p> <p>and,</p> <p>“The GN will continue to work with its co-management and planning partners to identify caribou habitat and other areas for protection as additional information is gathered”</p>
Comment / Question #3	Can the GN describe specifically to how it has considered the year-to-year variations in caribou calving ground locations in the Kitikmeot in its analyses and delineations?
Comment / Question #4	Likewise, how has the GN considered the temporal and spatial shifts in the Kitikmeot caribou calving grounds in its analyses and delineations?
Importance of the question to the Nunavut Land Use Plan Process	The KitIA has clearly and consistently articulated that area protection based on historical data caribou calving range use is inappropriate in the Kitikmeot due to the observed fluidity in occupancy. The responses to these questions will inform the Commission and planning partners how actively and possibly how effectively the GN has considered these matters with respect to the Kitikmeot delineations.

To: Government of Nunavut	
Subject: Caribou – Prohibited Uses	
Reference to Final Written Submission: Page 5	“As mentioned in previous submissions, the GN is committed to continuously monitoring and updating these delineations as more information becomes available and will certainly share any updates with the Commission. The GN will continue to work with its co-management and planning partners to identify caribou habitat and other areas for protection as additional information is gathered.”
Comment / Question #5	Can the GN speak to the timing and frequency of these monitoring efforts?
Comment / Question #6	Can the GN provide commitments to the timeliness of the analyses?
Comment / Question #7	<p>Will the GN’s analytical approach include recommendations and collaborations with other parties (e.g., NTI, RIAs, industry, etc.)?</p> <p>We ask this because, although the GN indicates a willingness to work with the co-management and planning partners:</p> <ol style="list-style-type: none"> 1. it took the GN a considerable amount of time to share the caribou data with the KitlA; and 2. the GN and KitlA have never discussed the merits and shortfalls of the different analytical approaches each has used.
Importance of the question to the Nunavut Land Use Plan Process	The GN plan for monitoring and updating caribou delineations is quite important to the process, as is their intent to collaborate with other parties and the timeliness of their analyses.

To: Government of Nunavut	
Subject: Caribou – Prohibited Uses	
Reference to Final Written Submission: Page 6	<p><u>“Mainland Migratory Herds Calving and Post-Calving Grounds:</u> Prohibition of development within calving grounds and key access corridors, with seasonal restrictions on activities in post-calving grounds.”</p>
Comment / Question #8	Does the GN intend that this recommendation apply unilaterally (i.e., on both Crown land and Inuit Owned Lands)?
Comment / Question #9	If the recommendation applies to IOL, is the GN proposing some form of compensation for private landowners?
Comment / Question #10	<p>Can the GN clarify its intention for this recommendation, specifically:</p> <ul style="list-style-type: none"> • How long does the GN intend for these Limited Use prohibitions to apply? • Does the GN intend for the caribou calving delineations to function as protected/conservation areas? • If the intent is for the prohibitions to apply short-term, can the GN commit to working with landowners to set out the conditions and timeframe for the prohibitions?
Importance of the question to the Nunavut Land Use Plan Process	The responses to the questions will provide clearer information to planning partners, and it may facilitate a variety of discussions from ranging property rights to the length of time a Limited Use designation should remain in effect.

To: Ekaluktutiaq Hunters and Trappers Organization	
From: Kitikmeot Inuit Association	
Subject: Victoria Island caribou calving grounds– Conditional Use designation	
Reference to Final Written Submission: Page 1, third bullet	
Comment / Question #1	<p>The KitlA stands by its request for IOLs to be designated as Mixed Use and that access to IOLs not be restricted.</p> <p>The KitlA does support a VEC designation for Victoria Island Caribou calving grounds, and each project proposal and review must consider and address mitigations for calving and post calving caribou.</p>
Importance of the question to the Nunavut Land Use Plan Process	Self-evident

To: Ekaluktutiaq Hunters and Trappers Organization	
From: Kitikmeot Inuit Association	
Subject: Caribou – VECs	
Reference to Final Written Submission: Page 1, fifth bullet	
Comment / Question #2	The KitlA supports the VEC designation and concurs that each project proposal and review MUST consider and address mitigations for calving and post calving caribou
Importance of the question to the Nunavut Land Use Plan Process	Self-evident

To: Ekaluktutiaq Hunters and Trappers Organization	
From: Kitikmeot Inuit Association	
Subject: Char Fishing Areas	
Reference to Final Written Submission: Page 2 – first bullet, Figure C	
Comment / Question #3	Can the EHTO please clarify the designation it wants applied to the Char fishing rivers.
Comment / Question #4	Can the EHTO please clarify if it intended to include Tree River in its list of Char fishing rivers.
Comment / Question #5	<p>As a recap, the EHTO requested Conditional Use designation for Victoria Island caribou calving grounds, and for other calving and post calving areas to be considered Valued Ecological Components and therefore considered for each project proposal and review.</p> <p>Can the EHTO please clarify what its recommendation regarding the 10-km buffer. Is this related to the char fishing rivers or caribou? If it related to caribou, can the EHTO explain the conflicting recommendations.</p>
Importance of the question to the Nunavut Land Use Plan Process	Clarification of recommended designations