



Beverly and Qamanirjuaq Caribou Management Board

13 January 2017

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Dear Ms. Ehaloak:

BQCMB Comments on 2016 Draft Nunavut Land Use Plan

Comments from the Beverly and Qamanirjuaq Caribou Management Board (BQCMB) on the 2016 Draft Nunavut Land Use Plan (DNLUP) are attached. We have used the template provided by the Nunavut Planning Commission (NPC) to organize our submission to facilitate identification of issues to be raised at the Public Hearing and decision-making by the Commissioners about revisions to be made to the DNLUP.

We regret that the BQCMB does not have the resources for translating this submission into the three languages you requested, and are providing the document in English only at this time. We note that according to "PROCEDURES FOR FINAL PUBLIC HEARING" issued by NPC on 7 October 2016, it is stated in clause 10f that "In accordance with the Commission's Policy on Translation and rule 13.6 of the RPHPR, . . . the Commissioners may waive these translation requirements for any participants who can demonstrate a lack of resources, a shortage or lack of access to adequate translation services, or other hardship that following these translation requirements would cause." Therefore we respectfully ask that the translation requirements be waived for this submission from the BQCMB.

Thank you for providing the BQCMB with the opportunity to participate in this review and to submit further input to support development of the first Nunavut Land Use Plan. We look forward to participating in the Public Hearing and future review processes. If you have any questions about these comments, please contact BQCMB Executive Director Ross Thompson (ross.thompson.1947@gmail.com) or Contract Biologist Leslie Wakelyn (wakelyn@theedge.ca).

Sincerely,

Earl Evans
BQCMB Chairperson

Encl: BQCMB Comments on the 2016 Draft Nunavut Land Use Plan

NUNAVUT PLANNING COMMISSION
PUBLIC HEARING ON THE 2016 DRAFT NUNAVUT LAND USE PLAN

BEVERLY AND QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

PRE-HEARING WRITTEN SUBMISSIONS

Filed by:
Leslie Wakelyn, BQCMB Contract Biologist
[13 January 2017]

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BEVERLY AND QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

Submission for the Public Hearing on the 2016 Draft Nunavut Land Use Plan

1/13/2017

1 Background and Objectives

1.1 What is the BQCMB and who does it represent?

The Beverly and Qamanirjuaq Caribou Management Board (BQCMB) is a caribou co-management board established in 1982. For 35 years the Board has advised governments and communities on the conservation and management of the Beverly and Qamanirjuaq caribou herds, which roam across portions of Nunavut, Northwest Territories, Manitoba, and Saskatchewan. Eight board members represent Inuit, Dene, Cree and Metis caribou harvesters from more than 20 communities that share the Beverly and Qamanirjuaq herds, and five members represent the governments of the two territories and two provinces and the federal government. All board members live and work in the North.

1.2 BQCMB involvement in the planning process to date

The outcome of Nunavut's land use planning process is of great interest and relevance to BQCMB members and the many communities who harvest the Beverly and Qamanirjuaq caribou herds. As a result, the Board has participated in the planning process for many years.

The BQCMB has submitted written comments to the Nunavut Planning Commission (NPC) on each Draft Nunavut Land Use Plan (DNLUP): in August 2010 on the Working Draft; in February 2014 on the 2011/12 DNLUP; and in March 2016 on the 2014 DNLUP. The Board has also had the opportunity to be a more active participant in NPC technical meetings in recent years, with BQCMB representatives joining parts of the NPC's first two technical meetings on the 2014 DNLUP in June and July 2015 by teleconference, and participating in person in the third and fourth technical meetings in January and March 2016. The BQCMB Chair and Contract Biologist both participated in the March 2016 Caribou Workshop. More specifics on these BQCMB contributions are provided in Appendix A.

The BQCMB has also contributed to the planning process by providing information about caribou and caribou habitat to NPC staff and contractors several times over the years. Prior to the production of the 2011/2012 version of the DNLUP, the BQCMB provided NPC contractors with information about the seasonal ranges of the Beverly and Qamanirjuaq caribou herds and the system that the Board had developed for rating the sensitivity of caribou and caribou habitat to disturbance from human land use activities, in the form of a report (BQCMB 1999¹) and a map atlas on CD (BQCMB 2000²). NPC contractors and staff were also provided with a paper that described the Board's position on the need for protection of

¹ BQCMB 1999. Protecting Beverly and Qamanirjuaq caribou and caribou range. Part I: Background information. Beverly and Qamanirjuaq Caribou Management Board, Ottawa ON. 40pp. Available on-line at: <http://arctic-caribou.com/maps/map-atlas/>
² BQCMB 2000. Protecting Beverly and Qamanirjuaq caribou and caribou range. Part II: Map atlas and documentation. CD-ROM created for the BQCMB by Leslie A. Wakelyn and David E.C. Taylor, Yellowknife, NWT. Available on-line at: <http://arctic-caribou.com/maps/map-atlas/>

important caribou habitats from land use activities (BQCMB 2004³). Most recently the Board provided NPC with maps and other information on fresh water crossings used by the Beverly and Qamanirjuaq herds and on its system for rating the importance of crossings from its map atlas (BQCMB 2000).

1.3 Process used and information relied upon to develop BQCMB submissions

Members of the BQCMB meet in-person twice each year, in spring and fall. At each meeting the Board receives updates on the status of the Nunavut land use planning process and input provided to NPC by BQCMB staff, and board members provide direction and input for upcoming BQCMB submissions and participation in NPC meetings. The Nunavut land use planning process has been a regular agenda item on which the BQCMB board has been briefed since fall 2004.

The BQCMB Executive Committee (Chair, two Vice Chairs, Executive Director) provides input and direction when needed between board meetings.

1.4 BQCMB perspective and specific interests relating to the DNLUP

Caribou as a shared resource

The BQCMB's mandate recognizes that the caribou herds provide a valuable shared renewable resource. Many caribou herds spend only part of each year in Nunavut. As a result, the fates of the herds and of caribou harvesters from Nunavut and from outside the territory can be affected by decisions and actions made by NPC and other Nunavut organizations, and Nunavummiut can be affected by decisions and actions made about caribou and caribou range outside of Nunavut. Therefore, how the transboundary nature of the migratory caribou herds is accommodated in the DNLUP is of great interest to the Board.

BQCMB is not against mining

The BQCMB is not against mining or other forms of economic development. The Board acknowledges that Nunavut has valuable mineral resources and that the mineral exploration and development industry will be important to the future of Nunavut's economy and people. But the Board believes that it is essential that the most sensitive and important caribou habitats have effective protection from the negative effects of land use activities such as mineral exploration and development.

The BQCMB believes that the conversation about the future of caribou and land use planning in Nunavut should be focused on protecting the most crucial caribou habitat while allowing for careful mineral exploration and development where appropriate. This is in marked contrast to discussions promoted by others that focus on a perceived choice between allowing mineral exploration and mines anywhere in the territory OR protecting key caribou habitat. The BQCMB believes a balance can be achieved in Nunavut where both healthy caribou herds and carefully designed and operated mineral exploration and extraction can occur.

The BQCMB strongly believes that the most sensitive and important caribou habitats that require protection from commercial land uses are those in calving grounds and post-calving areas and around key water crossings. The Board and the caribou harvesters it represents have consistently recommended that

³ BQCMB 2004. Protecting calving grounds, post-calving areas and other important habitats for Beverly and Qamanirjuaq caribou: A position paper. Beverly and Qamanirjuaq Caribou Management Board, Stonewall MB. 26pp. Available on-line at: <http://arctic-caribou.com/library/guiding-documents/>

mineral exploration and development activities in Nunavut occur only outside these three types of areas. The Board believes it is reasonable to request that this position be accommodated through the Nunavut land use plan, since this approach would still allow these land use activities to occur across most of the vast lands of Nunavut.

Precautionary approach is required

The BQCMB continues to ask NPC to apply a precautionary approach and to consider risk management in land use planning for Nunavut. This is based on the overall context and need for minimizing the cumulative effects of commercial land use activities on caribou, and is particularly important in the current era of declining and highly vulnerable caribou herds, including most herds that occupy range in Nunavut for part or all of each year. More specifically, protection of habitat for caribou in the NLUP should focus on managing the risk of major negative effects on caribou over the long-term, based on actions that can be taken now, but then adjusted over time if necessary as new information becomes available. The BQCMB believes we need to reduce the risk to the herds and to caribou harvesters where we can, and that we can do so by avoiding additional pressures that we know will contribute to overall cumulative effects.

The Board promotes a strong a precautionary position because there is no undoing the effects of mines, roads and associated human activities on caribou calving grounds and post-calving areas once they are established. We will not be able to go back and reverse changes to habitat or changes to the ability of caribou to use habitat in these areas once they occur. At this point in time, we still have an opportunity to be cautious and do our best to take care of caribou and crucial caribou habitats through actions led by and for the people of Nunavut who are creating the first territory-wide Nunavut land use plan, and who are supported by caribou harvesters across the caribou ranges. But if we are not cautious now, and instead we allow development of mines and roads on caribou calving and post-calving areas, we will have lost this opportunity.

The BQCMB believes that the burden of proof regarding effects of land use activities should be placed on those whose proposed actions would alter habitat and disturb caribou. That is, before any decisions are made to **not** provide protection through the land use plan for the most important sensitive caribou habitats (such as calving and post-calving areas and key water crossings), those arguing against protection need to provide convincing evidence that there is no risk of serious long-term effects to caribou herds resulting from leaving these areas open to their proposed activities.

Combination of area protection and other protection measures are needed

The BQCMB believes that what is required to protect caribou over the long-term in Nunavut is a combination of protected areas for the most sensitive and important caribou habitats plus restrictions on land use activities intended to reduce disturbance to caribou in other areas. Protected areas should prohibit specified industrial land use activities year-round. Other protective measures currently available or under development that could be used in Nunavut include seasonal restrictions on certain activities in specified areas, mobile protection measures that move with caribou and also vary seasonally, and terms and conditions on permitted land uses that are applied through the regulatory process. The Board's position is that **all** the tools available to protect caribou and caribou habitat should be used in combination, and that no one tool alone is adequate.

Compromises have been made to achieve balance

The BQCMB acknowledges that the protected areas proposed for caribou habitat in the DNLUP are significant geographic areas. However, they reflect compromises that have been made between the areas

that would be protected if there were no other values under consideration, and Nunavut could provide the ideal case for caribou habitat protection.

The BQCMB believes that the best situation for caribou in the NLUP would be protection of “traditional calving areas”, meaning all areas known to have been used for calving, delineated using all available telemetry and survey data (since the 1950s) and Inuit Qaujimagatuqangit (IQ) and other Traditional Knowledge. The BQCMB’s position is that development activities should be prohibited from post-calving areas as well as from calving areas, and that the entire area used during the post-calving period should be designated for protection. This combined area, including both traditional calving areas and complete post-calving areas, would be much larger than the protected areas currently proposed to be designated in the DNLUP for core calving areas, post-calving areas and key access corridors. However, they would be more likely to provide caribou herds with access to crucial calving habitat as herd sizes change through their long-term population cycles, and that is why they would ideally be what is protected in the NLUP.

The BQCMB realizes that there are other values under consideration in the NLUP in addition to the importance of geographic areas as caribou habitat, and therefore the Board supports the proposed protected areas for caribou in the DNLUP. However, it should be acknowledged that this compromise between caribou values and economic development values is not the ideal situation for caribou or caribou harvesters who wish to maintain their traditional caribou-using lifestyles and cultures.

Opposing perspectives do not recognize goal of balance and compromises made

The BQCMB has been disheartened by various proposals made by other parties at the NPC’s technical meetings as well as later developments that could influence opportunities for long-term conservation for caribou in Nunavut. These proposals would also affect options for maintenance of traditional lifestyles by caribou-using peoples across northern Canada, including Indigenous peoples in two territories and two provinces who are keenly interested in seeing Nunavut take a lead on caribou habitat conservation.

These proposals include:

- Grandfathering all existing mineral rights through all stages of mineral exploration and development, with no consideration given to how little investment may have been expended on exploration work or to the conservation value of the area where those rights are located.
- The Nunavut Cabinet’s decision to reverse the government’s position on calving ground protection in March 2016, and their still unsubstantiated claim that the existing regulatory system is all that is needed to ensure caribou protection. Notably the Nunavut Cabinet’s decision reversal is based neither on a public consultation process with Nunavummiut – which is blatantly contrary to its own policies - nor advice from its own caribou specialists.
- The December 15th 2016 submission by Indigenous and Northern Affairs Canada (INAC) to NPC, indicating that the agencies which are the official signatories of the final land use plan are either not supportive (Government of Nunavut, GN; INAC) or are ambivalent (Nunavut Tunngavik Incorporated, NTI) about protecting caribou habitat through designation of protected areas in the NLUP.

This indicates to the BQCMB that these parties:

- have not been listening closely to the input from caribou-using communities at the many NPC meetings they have attended,
- do not adequately value the perspectives of traditional caribou harvesters or the importance of access to caribou as a key element of food security,

- do not believe there should be a balance in Nunavut between traditional ways of life and the wage economy, and/or
- do not agree that the NLUP should assist with maintaining the traditional lifestyle and culture of Inuit who depend on access to caribou.

In the BQCMB's view, both the Nunavut and federal government positions are in opposition to the publicly-stated wishes of Inuit and other indigenous peoples for whom caribou are essential for cultural and spiritual survival.

The BQCMB believes that those parties arguing against establishing protected areas in the land use plan for the most important sensitive caribou habitats (such as calving and post-calving areas and key water crossings) need to provide convincing evidence that this will not increase the risk of serious long-term cumulative effects to caribou herds resulting from commercial land use activities such as mineral exploration and development and roads. No such evidence has been provided to date.

In conclusion, the BQCMB reminds all parties that because most caribou herds are a resource shared by different communities and jurisdictions, many people are watching and hoping that the final Nunavut land use plan will clearly show how much Nunavummiut continue to value caribou. It is hoped that the organizations responsible for finalizing and approving the NLUP on behalf of Nunavummiut will act cautiously in the interests of caribou and caribou harvesters, and make good use of this opportunity to protect caribou for the future.

2 General Comments and Recommendations

General comments from the BQCMB on some of the topics NPC identified in the template for submissions are provided below.

2.1 Quality of the planning process

While the BQCMB recognizes that the financial and other constraints under which the NPC operates sets limits on the review process, the Board agrees with comments made by others that NPC has set unrealistic expectations (particularly for translation) and timelines for the final round of written submissions that will likely not be met by most of the review participants. We expect that input requested by NPC from many parties, including HTOs and other community organizations, will not be forthcoming in writing as a result of these unrealistic expectations, and that verbal presentations for the Public Hearing may not be supported by the background materials that would assist the Commissioners with making decisions about final revisions to the DNLUP. Alternatively few parties may be able to provide translated submissions.

2.2 Incorporation of input from participants in the planning process

The BQCMB acknowledges the effort the NPC has made to accommodate the perspectives of the BQCMB and the many caribou harvesters and communities, both in Nunavut and neighboring jurisdictions, to whom the caribou herds are so important, in its proposed designation of core calving areas, post-calving areas, key access corridors and freshwater crossings as "Protected Areas" from which specified incompatible land uses would be prohibited. The BQCMB believes this effort is appropriate and addresses the NPC's mandate and broad planning objectives.

We were encouraged to see improvements made concerning planning issues relevant to caribou in the 2014 DNLUP compared to the 2012 Draft Plan, including the proposal to designate some of the most

sensitive caribou habitats as protected areas from which certain land use activities would be excluded. We were encouraged by further improvements recommended by NPC for protection of caribou habitat in the 2016 DNLUP, including changes to the areas of caribou habitat proposed for designation as protected areas, application of the protected area designation regardless of identified mineral potential, and clarification of specified prohibited land uses. This indicates to the BQCMB that NPC has listened carefully to the recommendations provided in written submissions and at technical meetings in 2015/16 from the BQCMB and many other parties representing caribou harvesters and caribou-using communities from across the caribou ranges in Nunavut and from outside the territory.

2.3 Overall balance among competing interests on important issues;

The BQCMB believes the DNLUP reflects the input provided to them by Nunavummiut and other participants and that NPC has described the mandate this input provided to them accurately under *1.4.2.1 Key Messages from Nunavummiut*:

“There must be a balance between industrial development and the environment in order to guarantee the long-term preservation and conservation of the land, wildlife, and wildlife habitat.

Residents would like to see the development of a stronger economy that would provide more business and employment opportunities, particularly for youth. At the same time residents want to maintain the traditional lifestyle of Inuit.” (p. 19)

The BQCMB believes that the NPC has made successful efforts to achieve a necessary balance between competing interests related to caribou habitat.

2.4 Other

Following are BQCMB comments on a few selected issues from the list identified by NPC in the Agenda for the Pre-Hearing Conference held in Iqaluit on September 27-29, 2016. Other issues identified in NPC’s list are addressed in our specific comments on content of the DNLUP (Section 3).

- 1) Are defined terms, land use designations (e.g. PAs, SMAs, Mixed Use) and restrictions, and prohibited land uses under NUPPAA s. 74(f) sufficiently clear, including where contravention of prohibitions may lead to enforcement actions?

Definitions provided - The two sets of definitions (“General” and “Transportation and Communications”) provided are very helpful and for the most part provide sufficient detail. One notable exception is the definition of monitoring, which is limited to the instance of mine monitoring related to closure and remediation programs. The BQCMB recommends that this definition be revised and expanded to describe monitoring related to NPC’s operational role (Section 6.3.5), other monitoring done through the regulatory process (e.g., by Nunavut Impact Review Board, NIRB; INAC, Regional Inuit Associations) and wildlife monitoring. All of these instances are relevant to the NLUP, either directly or indirectly.

Additional definitions required - The BQCMB recommends that the definition of seasonal ranges be clarified. In particular there is a need to generally define the seasonal ranges that protected area land use designations will protect (i.e., core calving areas, post-calving areas, and key access corridors). Confusion exists among parties to the planning process concerning the time period used for definition of areas, in part because of a lack of consistency outside of the land use planning

process. This means that participants in the planning process and the general public are not necessarily talking about the same things when they think they are in agreement.

For example, different time periods are used for calving and post-calving periods by various groups dealing with different herds. Most parties include the immediate post-calving period (3 weeks after cows give birth) in the stage they describe as the “calving period”, and some do not identify a post-calving period separate from calving. There is also variation in what parties include in the time they describe as the “post-calving period”.

- 2) Does the DNLUP and O&R accurately describe risk tolerances in identified land use sites and balance between economic development, opportunities, and traditional Inuit lifestyles?

The protected areas proposed for caribou habitat indicate that NPC has likely gone through a risk assessment process to find a balance between economic development, opportunities, and traditional Inuit lifestyles, but information on the specific risks assessed when developing recommendations are not described. The NLUP would be improved and decisions clarified if the O&R Document included descriptions of assessment of risks assessed, such as:

- What is the risk of being more precautionary than is absolutely necessary to protect caribou? For instance, what if in the future parties agree, based on evidence, that mineral exploration and development have been prohibited from a larger area than necessary to protect a particular calving ground for a specific caribou herd?
- What is the risk of not being precautionary enough to protect caribou? For instance, what if we allow significant habitat loss and/or reduction in availability of crucial habitat to occur on calving grounds through damage from mines and roads?

- 3) Has the DNLUP identified and addressed means of obtaining additional information to inform future plan reviews and amendments, including as it relates to planning in the marine environment?

- **Obtaining updated caribou information** - Descriptions of how additional information relevant to caribou-related issues will be obtained to inform plan reviews and amendments indicate a very passive approach, as follows:
 - 1.6 Limitation of Data (p. 20) - “As new information is provided, the NLUP will be updated as required to ensure the best information is available to support an integrated regulatory system.”
 - 2.2.1 Designations on Caribou Habitat (p. 27) – “The NPC intends to initiate Plan Amendments when new information on caribou, affecting the Land Use Designations in Schedule A, is received.”

NPC appears to have no system or schedule in place for obtaining or requesting periodic updates for information, including information on caribou and seasonal range use, and apparently GN will decide when to provide updates to NPC. However, it is not clear how often NPC would benefit from updated information.

Recommendation: An agreement should be developed between NPC and GN that outlines requirements and timeframes for providing updated information on caribou seasonal range use that will be relevant for updating the land use plan.

- **Caribou seasonal ranges** – Since the current boundaries of seasonal ranges are based entirely on analysis of telemetry locations of small number caribou cows for each herd monitored, it is expected that some change in extent of most seasonal ranges will occur over time. But it is not clear what extent of change in caribou seasonal ranges (such as calving and post-calving areas) is required to initiate Plan Amendments with revised boundaries for designated Protected Areas.

Recommendation: NPC should develop, in collaboration with GN and NIRB, an objective method for identifying what extent of change in caribou seasonal ranges will be required to initiate Plan Amendments. Different thresholds may be required for the various seasonal ranges.

- **Freshwater caribou crossings** – During creation of the first DNLUP, NPC started updating the current official list of “designated crossings”, which is based on past documentation by territorial governments and designation in legislation by the federal government. However, further updates based on IQ and other information from communities as well as information available from monitoring caribou using telemetry over the last 20 years should be part of the review and amendment process for the NLUP.

Recommendation: It should be clear in the NLUP that the listing and mapping of caribou fresh water crossings will be regularly updated based on new information from various sources.

3 Specific Comments and Recommendations

3.1 Caribou Habitat – Calving, Post-calving, Key Access Corridors, Freshwater Crossings

3.1.1 Reference in DNLUP and Options and Recommendations (O&R) Document

DNLUP: Pages 27-28, Section 2.2 Caribou

2.2.1 Designations on Caribou Habitat

2.2.1.1 Core Caribou Calving Areas

2.2.1.2 Key Access Corridors

2.2.1.3 Post-Calving Areas

2.2.1.4 Freshwater Caribou Crossings

O&R Document: Pages 38-45, Section 2.2 Caribou Habitat (Maps 47-58)

2.2.1 Designations on Caribou Habitat

2.2.1.1 Calving Areas

2.2.1.2 Post-Calving Areas

2.2.1.3 Key Access Corridors

2.2.1.4 Freshwater Caribou Crossings

3.1.2 Comment

There is a need for protection of the most sensitive and important caribou habitat in Nunavut, which the 2016 DNLUP proposes to provide through designating core calving areas, post-calving areas, key access corridors and freshwater crossings as “Protected Areas” in which specified incompatible land uses would be prohibited.

These designations are supported by the BQCMB, as well as by many other organizations representing caribou harvesters and communities which have traditionally relied on caribou for food and for maintaining their cultures, both in Nunavut and outside the territory. However, the agencies which are the official signatories of the final land use plan have stated that they are either not supportive of this designation (GN, INAC) or ambivalent (NTI), as indicated by the December 15th 2016 submission by INAC to NPC.

3.1.3 Recommendations

The BQCMB recommends that:

- 1) the protected area designations for core calving and post-calving areas, key access corridors and areas within 10 km of identified freshwater crossings be maintained in the final land use plan;
- 2) a comprehensive approach to caribou conservation in Nunavut should include, *at a minimum*, prohibition of incompatible industrial land uses from core calving grounds;
- 3) the potential feasibility, conservation value and acceptability to industry of mobile caribou conservation measures as proposed by the Kivalliq Inuit Association be assessed as a tool for providing protection to caribou from disturbance outside calving and post-calving protected areas; and
- 4) protected area land use designations, mobile caribou conservation measures and terms and conditions assigned through the regulatory process be viewed and utilized as a package of measures required for caribou and habitat conservation, and that no single measure be considered as the sole conservation tool required to protect both caribou and habitat from the cumulative effects of industrial land use in Nunavut.

3.1.4 Rationale

Much of the following rationale was presented by the BQCMB's representatives at the NPC's 4th Technical Meeting/Caribou Workshop in March 2016.

The Need for Protection of Caribou and Caribou Habitat is Well-known

Sensitivity of caribou: It is well known that caribou sensitivity to disturbance varies seasonally due to various ecological factors, and that caribou are highly sensitive immediately before, during and soon after calving. There has been agreement on these points among caribou harvesters and their communities across the northern caribou ranges, based on Traditional Ecological Knowledge, including Inuit Qaujimajatuqangit (IQ) of Inuit harvesters. This view has been shared by biologists, wildlife managers and other researchers consistently over the years.

Sensitivity of habitat: The habitat that calving and immediate post-calving areas provide to caribou is widely accepted as being the most important due to its role in providing crucial options for foraging, as well as predator avoidance. While on the calving ground the cows require nutritious forage during the final days of pregnancy and the critical three weeks after calving, while she provides milk to her calf.

The importance of habitat used for calving and post-calving and the need for its protection from damage has been repeatedly described for decades by organizations representing caribou harvesters, governments and the general public during their participation in environmental screening and assessment of proposed projects on caribou calving grounds and land use planning processes in Nunavut and elsewhere.

To maintain a healthy herd and good herd productivity it is critical, among other things, that caribou cows and calves and the habitats they use during calving and immediate post-calving periods are protected from

disturbance and modification. Cows and calves should be protected from disturbance during the calving and immediate post-calving periods to allow them to obtain adequate nutrition, reduce the chance of calves dying as a result of poor nutrition, and maximize growth of calves during their first month so they have a greater chance of surviving their first year of life. The habitat in calving and post-calving areas should be protected from disturbance and modification so adequate forage is available and accessible during these periods.

Determining what caribou habitat is necessary to protect relates not only to geographic area (physical space), but must also consider the following:

- Caribou need access to that habitat (including for instance, unimpeded use of key water crossings, and not having movements diverted during migration or access to feeding areas blocked by barriers),
- Essential habitat components (including vegetation) must be uncontaminated and available for caribou to use to gain nutritional benefits (so for instance, forage cannot be covered in dust or contaminated materials), and
- When caribou occupy that habitat they must be able to utilize it fully in order to meet their requirements (and therefore cannot be subjected to frequent disturbance).

The Negative Effects of Industrial Land Use on Caribou are Widely Recognized

The negative effects of land use activities include not only obvious direct and immediate effects, such as mortalities resulting from impacts with vehicles, but also more subtle and longer-term effects, such as reduced productivity or calf survival resulting from repeated interruptions to foraging.

Many studies have examined the effects of various human land use activities on caribou and habitat over the past 40 years, and several literature reviews have been conducted which describe most of those studies. Two of the most recent reviews were conducted for the Nunavut Wildlife Management Board (Trailmark 2015⁴) using both scientific and traditional knowledge references, and for the Government of Nunavut (EBA 2011⁵).

As a result of this research and direct observation by hunters and others while on the land, wildlife biologists and managers and caribou harvesters and their communities have strong concerns about increasing land use activities on caribou ranges. Many questions remain about how caribou are affected by various activities, including questions regarding: the effects of human activities on caribou under various ecological circumstances; the cumulative effects from activities that caribou encounter across their annual ranges over time; and how accumulating effects on caribou resulting from human activities interact with the effects of other factors such as climate change. We do not have a complete understanding of effects on caribou population health, and much remains to be learned about effects on individual caribou as well. The BQCMB believes that this situation indicates a need for application of a precautionary approach⁶. (See also 1.4.)

Tools for Mitigating Effects on Caribou Do Not Provide Sufficient Protection if Used Alone

The BQCMB acknowledges that there are tools available that can play a role in mitigation and management of the potential negative effects of industrial land use activities on caribou. However, there is no

⁴ Trailmark Systems Inc. 2015. Review of post-2010 Literature on the Human Effects on Barren-Ground Caribou: Focus on Traditional Knowledge, Western Science and Caribou Protection Measures. Prepared for the Nunavut Wildlife Management Board.

⁵ EBA Engineering Consultants Ltd. 2011. Anthropogenic disturbance on ungulates, guidelines and mitigation of impacts. Prepared for the Government of Nunavut, Department of Environment. 107 pp.

⁶ "The precautionary principle states that if an action might cause severe or irreversible harm to the environment, in the absence of a scientific consensus that harm would not ensue, the burden of proof falls on those who would advocate taking the action." (Environment Yukon 2009. p. 9).

documented evidence that the measures currently in place are effective in providing adequate protection. The other main deficiencies these tools have in common, is that they are designed to reduce, not eliminate negative effects, and they do not provide sufficient protection for crucial caribou habitat such as calving areas.

Nunavut's regulatory process - The GN, INAC and Kitikmeot Inuit Association appear to believe that the Nunavut Impact Review Board (NIRB) process is sufficient for protecting caribou and habitat. There are several deficiencies with this approach which include:

- NIRB cannot recommend against activities on specific geographic areas unless they are designated under the land use plan.
- The permit terms and conditions on activities issued by regulatory agencies (such as seasonal restrictions on certain activities during specific periods when and where caribou are present) may reduce disturbance to caribou, but they will not ensure that damage to sensitive habitat is prevented.
- Activities that fall below a threshold for permit requirements are not subject to terms and conditions, or monitoring by regulatory agencies. The effects of these activities on caribou and habitat will accumulate and contribute to cumulative effects over time and space.
- Effectiveness of terms and conditions for protecting caribou needs to be evaluated based on compliance and effects monitoring, but that monitoring is not conducted for all activities that can cause negative effects.

Caribou Protection Measures (CPM) - The conservation value of federal CPM established in 1978 remains largely unmeasured, unmonitored, and unknown. The standard CPM currently in place were designed to mitigate the effects of exploration activities and do not regulate effects of mineral development or protect caribou habitat. They provide untested and variably enforced measures that should not be relied on alone to protect caribou. The BQCMB has recommended for many years (BQCMB 2004) that the standard CPM should be improved.

Deficiencies of standard CPM for providing protection for caribou and caribou habitat include the following:

- There is no documented evidence, particularly since 1990 when the monitoring program that was integral to CPM was discontinued, that: a) land use operators have complied with CPM; b) disturbance has been avoided or even reduced for those projects where CPM have been required; or c) application of CPM has made a difference by significantly reducing effects of mineral exploration on caribou. Application of CPM since 1990 has been largely a “paper exercise” with theoretical and unproven benefits to caribou.
- CPM are only applied through federal land use permits and Inuit land use licenses; they do not apply to activities that do not require these authorizations (e.g., sub-threshold exploration activities).
- CPM address only certain types of disturbance on a project-specific basis, and they only apply to the caribou themselves without regard for the importance of habitat.

Proposed Mobile Caribou Conservation Measures (MCCM) - A new tool for caribou protection has been proposed by the KIA (Poole and Gunn 2016⁷) as “mobile caribou conservation measures”. This new tool for caribou conservation adapts and updates CPM to move with the caribou and make use of telemetry and other means for monitoring caribou locations in relation to sites where activity occurs. This tool has potential for reducing disturbance to caribou, but shares the limitations of standard CPM in not providing

⁷ Poole, K. and A. Gunn. 2016. Management of post-calving areas in the Kivalliq region of Nunavut. Report for the Kivalliq Inuit Association. 15 November 2016.

protection for habitat. MCCM could be investigated and further developed with INAC and Nunavut's Regional Inuit Associations as a tool for mitigating effects of exploration and development, specifically outside calving and post-calving areas. However, whether the associated monitoring requirements and costs and the relatively complex methodology (compared to the original CPM) will be accepted by industry remains to be seen.

Protected Areas are the Only Option for Avoiding Impacts on Caribou Habitat

The BQCMB has consistently called for long-term protection of caribou calving grounds and post-calving areas through prohibition of industrial land use activities such as mineral exploration and development. The Board's main recommendation in a 2004 position paper on protecting important caribou habitats was that legislated protected areas to provide permanent habitat protection should be established. However, during the past decade no plans have been advanced for application of federal or territorial protected area legislation to these areas in Nunavut. Therefore the BQCMB believes that protection through land use plan designation is currently the best alternative.

- *Protection of caribou and habitat through avoidance of negative effects* - The BQCMB recommendation to NPC to protect caribou calving grounds and post-calving areas is intended to safeguard caribou and habitat from the negative effects of disturbance and other aspects of land use activities in these areas through **avoidance** of direct negative effects on both sensitive animals and habitats. This is required because measures directed at reducing or minimizing the negative effects of disturbance (such as mobile protection measures or terms on permits) may not provide complete protection to vulnerable animals during the most sensitive time period, since they do not completely avoid interactions between caribou and human activities. They also will not provide any meaningful protection against changes to habitat that will lead to fragmentation and reduced habitat quality, quantity and effectiveness.
- *Protected areas as an accepted tool for wildlife conservation*: Restrictions to land use activities applied to specific geographic areas is a well-established conservation tool, used globally for more than a century. Selected geographic areas are protected and managed primarily to support the conservation of biodiversity⁸, to protect crucial habitats for specific species, to protect important cultural heritage and to safeguard special physical features. At least three area-based approaches have been used to support caribou conservation in northern Canada: permanent legislated protected areas (e.g., Tukturnogait National Park, which protects part of the Bluenose West caribou calving ground), other conservation areas (e.g., Thelon Wildlife Sanctuary, which protects part of the traditional Beverly caribou calving ground), and land use plans (e.g., the Edaíla Conservation Zone in the Sahtu Land Use Plan, which protects part of the summer and fall range of Bluenose East caribou).
- *Land use planning offers flexibility* - Area protection applied in land use planning can be both temporary and flexible, as the land use plan can be amended or changed in future based on new information. Land use planning does not produce permanent legislated protection and plan designations do not "lock-up" resources forever. Decisions made for Nunavut's first territory-wide land use plan can be re-evaluated by Nunavummiut in future and revised if warranted based on new information.

⁸ The Government of Canada has committed to meet a global biodiversity target by applying area-based conservation measures to at least 17 per cent of terrestrial and inland water and 10 per cent of coastal and marine areas by the year 2020 (CPAWS 2015). NLUP Protected Areas may contribute to that goal.

3.1.5 Supporting Material

BQCMB presentations and comments provided at NPC Technical Meeting No. 4, Caribou Workshop, March 2016: 7 videos in English, 7 videos in Inuktitut available at: <http://www.nunavut.ca/>

3.2 Caribou Habitat – Other Seasonal Ranges

3.2.1 Reference in DNLUP and Options and Recommendations (O&R) Document

DNLUP: Pages 27-28, Section 2.2 Caribou

2.2.1 Designations on Caribou Habitat

2.2.1.6 Other Seasonal Ranges

O&R Document: Pages 38-45, Section 2.2 Caribou Habitat (Maps 47-58)

2.2.1 Designations on Caribou Habitat

2.2.1.6 Caribou Rutting Areas

2.2.1.7 Caribou Migration Corridors

2.2.1.8 Caribou Summer Range

2.2.1.9 Caribou Late Summer Range

2.2.1.10 Caribou Winter Range

3.2.2 Comment

Caribou rutting areas, migration corridors, summer range and late summer range are assigned a mixed use designation and are presented as areas that are important to caribou as VECs. The BQCMB supports this approach in principle but believes clearer and more detailed direction for managing land use activities and conformity requirements for project proposals located in these areas should be provided in the NLUP.

Caribou winter range is assigned a mixed use designation with no information provided about their value to caribou. The BQCMB supports the designation but not the lack of information on their value to caribou. Availability of high value winter range can be limited for some herds, particularly in years following major wild fire seasons in forested areas. Climate change effects may increase this issue for caribou in future.

3.2.3 Recommendations

- The BQCMB recommends that NPC include specific minimal mitigation requirements in the NLUP that would apply as conformity requirements to project proposals located in seasonal habitats designated as VECs. NPC could work with NIRB and GN to develop these requirements.
- The BQCMB recommends that the NLUP include information about caribou winter range so that project proponents and the NIRB are aware that these areas may be used by caribou during the winter period. This will allow appropriate mitigation measures and permit terms and conditions to be applied to minimize disturbance to caribou while on their winter range.

3.3 Areas of Mineral Potential in Protected Areas for Caribou

3.3.1 Reference in DNLUP and Options and Recommendations (O&R) Document

DNLUP: Page 42, Section 5.2 Mineral Potential

O&R Document pages 75-76

3.3.2 Comment

High mineral value should not be automatically considered the best use of any and all lands, because if there are other values, they should be considered. Therefore the extremely high value of the most

sensitive and important caribou habitat to Inuit and other traditionally caribou-using peoples should be considered in the NLUP.

3.3.3 Recommendation

The BQCMB recommends maintaining designation of calving grounds, post-calving areas, key access corridors, and water crossings as protected areas regardless of their mineral potential.

3.4 Transportation - Linear Infrastructure Corridors (Terrestrial)

3.4.1 Reference in DNLUP and Options and Recommendations (O&R) Document

DNLUP: Pages 43-45, Section 5.5: 5.5.1 Terrestrial Linear Infrastructure; Section 7.1 Annex A1; Section 7.2 Annex A2
O&R Document page 77

3.4.2 Comment

The BQCMB disagrees with recommendations by Government of Canada (GoC) in June 2015 and Kivalliq Inuit Association (November 2016 expert report) that the entire proposed Manitoba-Kivalliq road corridor should be exempted from prohibition on all-season roads through the first NLUP. An application for a Plan Amendment can be considered in future if and when the Manitoba-Kivalliq road corridor is submitted for approval as a project proposal.

More generally, the NLUP should not designate exemptions from protected area prohibitions for linear infrastructure corridors that have not yet been submitted as proposals for approval. Roads and other linear infrastructure should be prohibited from all protected areas initially, with project proposals requiring scrutiny by NPC through an alternatives assessment and subsequent review by the NIRB and other regulatory authorities.

3.4.3 Recommendation

The BQCMB support the approach taken by NPC for planning linear infrastructure in Nunavut, and recommends that the prohibition on linear infrastructure protected areas for calving grounds, post-calving areas, key access corridors and freshwater crossings be maintained in the NLUP.

3.5 Grandfathering of Existing Rights in respect of Projects/Project Proposals

3.5.1 Reference in DNLUP

DNLUP: Page 52, Section 6.5: 6.5.1 Existing Rights - Minerals

3.5.2 Comment

Based on expert reports and other materials submitted to NPC and posted on the Consultation Record, it appears that the issue of grandfathering existing mineral rights has not yet been resolved and will likely be subject to ongoing discussion by legal counsel of various agencies. Therefore the BQCMB will restrict our comments to what is written in the DNLUP and to reiterate our previous comment as follows:

“In the past the BQCMB had been told by federal government staff that prospecting permits and mineral claims provide ensured access to defined parcels of land for a specific purpose (mineral exploration) and a specified time period, but do not provide “rights” for mine development. The BQCMB does not agree with the interpretation that all tenures were issued with certainty of the right to complete the full mining lifecycle from the initial mineral tenure through to mine development and that no prohibitions on any land uses related to mineral exploration and mining (including all-weather roads) should occur where mineral tenures exist.” (BQCMB letter to NPC, 4 March 2016)

Significant Modifications – The DNLUP currently states that “NUPPAA requires a Project/Project Proposal to be submitted for a Conformity Determination if there is a “significant modification” to a Project/Project Proposal with Existing Rights”, provides some examples of “what the NPC may consider to be “significant modifications” from a planning perspective” and states that (emphasis added) “Transitioning from one stage to another *may be* considered a significant modification and *could* require a Conformity Determination”. Although this description is somewhat helpful, greater certainty about what types of project modifications will likely require a Conformity Determination would be more helpful for proponents and others, including the BQCMB.

3.5.3 Recommendation

The BQCMB recommends that grandfathering of all mineral tenures to full mine development not be implemented through the NLUP. At a minimum, prospecting permits should be excluded from grandfathering to the mining stage of mineral development. We also urge the GoC and NPC to determine at what date tenures will be considered “existing” for application of the first and subsequent versions of the NLUP.

3.6 Recommendations for Additional Research and Studies

3.6.1 Reference in DNLUP

Page 53-54, Section 6.8 particularly 6.8.2 Caribou, 6.8.3 Climate Change, 6.8.5 Cumulative Impacts, 6.8.8 Heritage Rivers

3.6.2 Comment

The BQCMB supports NPC’s recommendations for the Canadian High Arctic Research Station (CHARS) and the Nunavut General Monitoring Program (NGMP) to work cooperatively, for a Strategic Environmental Assessment to be conducted in the central Kivalliq region and for additional research to be focused in the general areas listed. However, who was involved in developing the list of recommended research priorities and why those specific questions have been identified as priorities for recommendation through the NLUP should be clarified. The list of questions is limited and should be expanded, taking into account research priorities identified by Nunavut organizations (including NGMP, GN and NWMB). The BQCMB recommends that the list provided in the DNLUP be proposed as initial ideas for discussion, and that experts in the various subject areas be invited to recommend additional research areas, with involvement of CHARS, NGMP and others.

3.6.3 Recommendations

The BQCMB offers a few preliminary recommendations regarding priorities:

- Cumulative effects on caribou should be considered at the range-wide scale, and not focused only on areas of “heavy development” in Nunavut. (Sec. 6.8.2)
- Climate change priorities should not focus only on marine habitats and wildlife, but should include research on climate change effects on caribou and caribou habitat. (Sec. 6.8.3)
- Thresholds should be identified for managing cumulative impacts of commercial and industrial developments on caribou as well as on important caribou habitats. (Sec. 6.8.5)
- Research to identify impacts of a proposed road and/or railway in mainland Nunavut should also investigate environmental impacts, including effects on caribou, caribou habitat and harvest levels and patterns.(Sec. 6.8.7)
- Research related to the Thelon and Kazan heritage rivers should include identifying important caribou crossings and other key areas of important caribou habitat. (Sec. 6.8.8)

3.7 Alternatives Assessment for Proposed Linear Infrastructure

3.7.1 Reference in DNLUP

Page 57, Section 7.1 Annex A1; Section 7.2 Annex A2

3.7.2 Comment

The BQCMB supports in principle the approach taken by NPC for assessing alternatives.

3.7.3 Recommendation

The BQCMB recommends inclusion of questions that may be relevant to linear infrastructure proposals through key caribou habitat through all seasonal ranges. In particular, we support questions related to:

- route selection (#4), including requiring demonstration by the proponent that areas that provide important caribou habitat will be avoided, or if not, that the impact of the proposal on caribou and habitat has been recognized and qualitatively assessed prior to application being made to NPC.
- road proposals (#6 a,b), including determining if proponents have credible plans for limiting public access to private roads. This should be a consideration in areas of key caribou habitat, especially if the proposed road will increase access to caribou for hunting.

3.8 Table 1: Land Use Designations

3.8.1 References in DNLUP

Page 70, Site 38 Core Caribou Calving Areas, Site 39 Post-Calving Areas, Site 40 Key Access Corridors

Page 71, Site 45 Thelon Wildlife Sanctuary, Site 49 Queen Maud Gulf Migratory Bird Sanctuary

Page 79, Site 159 Freshwater Caribou Crossings

3.8.2 Comment

There is some inconsistency in application of prohibited uses to areas proposed for designation as protected areas. The BQCMB does not believe that commercial tourism activities that required permanent infrastructure or obnoxious land use (as defined by NPC) should be allowed in caribou calving areas, post-calving areas, key access corridors or around freshwater crossings. Such uses could deter caribou from using these crucial areas and/or damage sensitive habitats.

3.8.3 Recommendations

- The BQCMB recommends the designation of core caribou calving areas, post-calving areas, and key access corridors as protected areas be maintained in the NLUP and that the prohibition of land uses be retained as specified, with the addition of “permanent tourism related structures” as a prohibited use.
- The BQCMB recommends that the designation of the Thelon Wildlife Sanctuary and Queen Maud Gulf Migratory Bird Sanctuary as protected areas be maintained and the prohibition of land uses be retained as specified, with the addition of “permanent tourism related structures” and “obnoxious land use” as prohibited uses.
- The BQCMB recommends that the designation of Freshwater Caribou Crossings as protected areas be maintained and that the prohibition of land uses be retained as specified, with the addition of “obnoxious land use” as a prohibited use.

4 Editorial Recommendations and Considerations

Page #	Description, Recommendation and Rationale
DNLUP P. 27	<p>Section 2.2.1.1 Core Caribou Calving Areas</p> <p>Core-calving areas are of critical importance for maintaining healthy caribou populations. They are also the place where caribou are most vulnerable to disturbance. The impacts of exploration and development cannot be effectively mitigated in core-calving areas.</p> <p>Recommendation - Core Caribou Calving Areas Core-calving areas are of critical importance for maintaining healthy caribou populations. They are also the place where caribou are most vulnerable to disturbance. The impacts of exploration and development <u>on caribou and habitat</u> cannot be effectively mitigated in core-calving areas.</p> <p>Rationale for changes</p> <ul style="list-style-type: none"> • Core calving areas are the areas proposed for protected area designation, but it is calving areas more generally to which the description refers. • It is important to specifically identify impacts on habitat as well as on caribou.
DNLUP P. 33	<p>Section 3.3.2 - Figure 5 - Migratory Bird Sanctuaries of Nunavut: Queen Maud Island</p> <p>Recommendation - Migratory Bird Sanctuaries of Nunavut: Queen Maud Island <u>Gulf</u></p> <p>Rationale for change – Error in listed name.</p>
DNLUP P. 87	<p>Tables - Table 6: Data Sources for Nunavut Land Use Plan – Draft 2016</p> <p>PSE - Caribou - Freshwater Crossings (159) - Government of Nunavut; Department of Environment, Kivalliq Wildlife Board, Caribou Protection Measure, Rankin Inlet HTO</p> <p>Recommendation - Government of Nunavut; (Department of Environment), Kivalliq Wildlife Board, <u>INAC</u> Caribou Protection Measures, Rankin Inlet HTO, <u>Beverly and Qamanirjuaq Caribou Management Board</u>.</p> <p>Rationale for changes</p> <ul style="list-style-type: none"> - It is important to know if the source referred to is the official federally-legislated (INAC) Caribou Protection Measures or some other; see also comment on <i>Caribou Protection Measures</i> in Section 2.8 above. - The BQCMB provided all its information and sources on freshwater crossings to NPC and it appears to have been used for mapping in the 2016 DNLUP, but the BQCMB was not listed as a data source for this information.
O & R P. 41	<p>Section 2.2.1.1 Calving Areas</p> <p>Additional considerations for managing caribou calving areas:</p> <ul style="list-style-type: none"> • The following participants have recommended protection of caribou calving areas: <ul style="list-style-type: none"> ○ Beverly and Qamanirjuaq Caribou Management Board (2015-06-22) ○ Government of NunavutWT Department of Environment and Natural Resources (2014-02-13) <p>Recommendations</p> <ul style="list-style-type: none"> ○ Beverly and Qamanirjuaq Caribou Management Board (<u>2010-08-27, 2014-02-14, 2015-06-22, 2016-03-04</u>) ○ Government of NunavutWT Department of Environment and Natural Resources (2014-02-13) <p>Rationale for change – Errors in listing:</p> <ul style="list-style-type: none"> ○ The BQCMB has recommended protection of calving areas in written submissions to NPC as follows: on the Working Draft in August 2010, on the 2011/12 DNLUP in February 2014, and on the 2014 DNLUP in June 2015 and March 2016. For more details see Appendix A. ○ Should be Government of NWT.

<p>O & R P. 42</p>	<p>Section 2.2.1.2 Post-Calving Areas Additional considerations for managing caribou calving areas:</p> <ul style="list-style-type: none"> • The following participants have recommended protection of caribou post-calving areas: <ul style="list-style-type: none"> ○ Beverly and Qamanirjuaq Caribou Management Board (2015-06-22) <p>Recommendations</p> <ul style="list-style-type: none"> ○ Beverly and Qamanirjuaq Caribou Management Board (2010-08-27, 2014-02-14, 2015-06-22, 2016-03-04) <p>Rationale for change – Error in listing:</p> <ul style="list-style-type: none"> ○ The BQCMB has recommended protection of post-calving areas in written submissions to NPC as follows: on the Working Draft in August 2010, on the 2011/12 DNLUP in February 2014, and on the 2014 DNLUP in June 2015 and March 2016. For more details see Appendix A.
<p>O & R P. 43</p>	<p>Section 2.2.1.4 Freshwater Caribou Crossings Additional considerations for managing caribou calving areas:</p> <ul style="list-style-type: none"> • The following participants have recommended protection of freshwater caribou crossings: <ul style="list-style-type: none"> ○ Beverly and Qamanirjuaq Caribou Management Board (2015-06-22) <p>Recommendations</p> <ul style="list-style-type: none"> ○ Beverly and Qamanirjuaq Caribou Management Board (2015-06-22, 2016-03-04) <p>Rationale for change – Error in listing:</p> <ul style="list-style-type: none"> ○ The BQCMB recommended protection of post-calving areas in written submissions to NPC on the 2014 DNLUP in June 2015 and March 2016. For more details see Appendix A.
<p>O & R P. 44</p>	<p>Section 2.2.1.8 – Caribou Summer Range Additional considerations for managing caribou late summer range:</p> <ul style="list-style-type: none"> • The Government of Nunavut has identified caribou late summer range for mainland herds based on tracking caribou (collared cows) by telemetry; <p>Recommendation - Additional considerations for managing caribou late-summer range:</p> <ul style="list-style-type: none"> • The Government of Nunavut has identified caribou late-summer range for mainland herds based on tracking caribou (collared cows) by telemetry; <p>Rationale for change – Errors in text.</p>
<p>O&R P. 79</p>	<p>Section Appendix A – Tables - Table 1: Land Use Designations Recommendation - Insert Table 1. Rationale for change - The “Options and Recommendations-Tables” pdf includes only Tables 2-6. It is probably safe to assume that this table is meant to be the same table as the 17-page Table 1 in the DNLUP, but that information doesn’t appear to be provided in the O&R document.</p>

5 Appendix A. Input Provided by the BQCMB to the NPC, 2010-2016.

2010-08-27: BQCMB letter to NPC. BQCMB Comments on Working Draft of the Nunavut Land Use Plan. 8 pp.

2014-02-14: BQCMB letter to NPC. BQCMB Comments on 2011/12 Draft Nunavut Land Use Plan. 44 pp. (5-page cover letter plus attachments)

2015-06-22: BQCMB letter to NPC, 22 June 2015. BQCMB Comments for First Technical Meeting on 2014 Draft Nunavut Land Use Plan. 7 pp.

2015-07-14 & 15: Comments by Ross Thompson, BQCMB Executive Director, and Leslie Wakelyn, BQCMB Contract Biologist (both participating by phone). *IN*: Draft Nunavut Land Use Plan. Nunavut Planning Commission 2nd Technical Meeting on 2014 Draft Nunavut Land Use Plan. July 14-15, 2015. Rankin Inlet, Nunavut. Transcript. 131 pp.

2015-08-07: BQCMB letter to NPC, 7 August 2015. BQCMB Follow-up to Second Technical Meeting on 2014 Draft Nunavut Land Use Plan. 7 pp.

2016-01-18 to 22: Comments by Leslie Wakelyn, BQCMB Contract Biologist (participating in person). *IN*: Draft Nunavut Land Use Plan. Nunavut Planning Commission 3rd Technical Meeting on 2014 Draft Nunavut Land Use Plan. January 18-22, 2016. Rankin Inlet, Nunavut. Transcript. 267 pp.

2016-03-04: BQCMB letter to NPC, 4 March 2016. BQCMB Comments on 2014 Draft Nunavut Land Use Plan and Technical Sessions. 9 pp.

2016-03-7, 9, 10: Comments and presentations by Earl Evans, BQCMB Chair, and Leslie Wakelyn, BQCMB Contract Biologist (both participating in person). Nunavut Planning Commission 4th Technical Meeting on 2014 Draft Nunavut Land Use Plan – Caribou Workshop. March 7-10, 2016. Rankin Inlet, Nunavut. 14 videos, 7 each in English and Inuktitut.