



August 31, 2022

Att: Michelle Swallow
Manager, Conservation Planning & Implementation Unit
NWT Department of Environment and Natural Resources
PO Box 1320
Yellowknife, NT X1A 2L9
By email to: conservationplanning@gov.nt.ca

Dear Michelle Swallow,

Re: Chamber of Mines Response to *Draft Healthy Land, Healthy People*

On behalf of the Chamber of Mines, please accept this submission as our response to the *Draft Healthy Land, Healthy People, 2022-2027*.

Let us preface our submission by saying that industry does not question the need to protect NWT land, water and all of its diversity from the effects of development.

The draft document is very much environmentally focused, providing a very narrow perspective best suited to just the department of Environment & Natural Resources' mandate. We believe that this document is intended to reflect the position of the entire NWT Government and, as such, should be rebalanced. From a whole-of-government perspective, there is more information that the public needs and deserves to know, to better understand the big picture on what and why the need for protected areas. There is no other GNWT document that we are aware of that does this.

We are deeply concerned that, as currently drafted, the document sends a message that there must be renewed efforts to protect more land. However, it offers no evidence on that need. The argument actually hinges on fear, that more protected areas are required to protect the lands around us.

If carried out, this would result in further removal of lands from potential resource development. This would not help support the primary contributor to the economy; nor is it necessary given that approximately 30% of the territory is already protected by being closed to development.

In other words, the facts do not bear out the need for more protected areas, witness:

- The NWT has one of the most robust land protection regulatory regimes in place today, one that is based in Indigenous land claims, and has the active participation and management with Indigenous northerners. One of the key reasons for this new regime

was to prevent legacy land damages from the past when the NWT didn't have such robust legislation and regulations. This new regulatory regime means that NWT lands and waters are already strongly protected from any significant adverse environmental effects from land and resource development. **We recommend that this be strongly stated in the document so as to inform northerners that the regulatory system is already providing new strong protection, and that protected area tools are used in special circumstances where warranted.**

- Today, approximately 30% of the NWT is already closed to development through various bounded areas. This is demonstrated by the NWT Mining Recorder Office's Heat Map, and in the table we have provided. The NWT is much further ahead of Federal and international aspirations. In other words, the NWT is already there. This is already affecting investment, and Federal statistics show a sharp reduction in exploration investment in the NWT over the past two decades from a 15% share of Canada's exploration expenditures in 2007 to an estimated less than 2% in 2022. Shrinking land access has been a contributor. By not revealing the facts around land closures to development, the draft implies still not enough has been done to remove lands from potential resource development. **We recommend that the final document inform northerners on all lands protected formally and by dint of being inaccessible to development. We have attached a draft table as a starting point.**
- There is an important additional consideration when assessing the fullness of protection of lands in the NWT. The lands identified by the Mining Recorders Office and in our table are areas demarcated by clear boundaries. It is important to the full understanding of protection to realize that these bounded areas will also restrict access to development in large quanta of land beyond their boundaries. Consequently, the impact of existing protected areas is much greater than the 30% currently designated for protection. Healthy Land, Healthy People must make this clear to its audience, and **these additional lands should be considered in any further work to describe lands in the NWT protected from development.**
- The next five years covered by this new document should perhaps be focused on simply completing the formalization of protected areas already in process, and not adding any new areas that would exceed 30%. In the cases where it might be absolutely necessary, **we recommend that mineral resource assessments be conducted to inform any final boundaries.** In addition, **we recommend that other protected areas be reduced by the same amount being proposed in a new area, to keep a no net loss of lands accessible for potential development.**
- The title of the report "Healthy Land, Healthy People" implies incorrectly that increased efforts to protect land will create healthy people. But that is only one part of the equation. At the top of the list in both Canada's [*Social determinants of health and health inequalities*](#) and the [*World Health Organization's Social determinants of health*](#) are other important contributors to healthy people: employment, income, social status and working conditions. In the north, resource development is also absolutely essential to healthy people. Land management requires a balance between outright removal of lands for protection and maintaining sufficient lands for economic development. **We**

recommend that the final document position healthy land within this broader context of other contributors to healthy people to help provide that balance.

We believe that the public has a right and need to more balanced information in this planning document, to understand that removing lands from development has its place, but maintaining sufficient lands for development also contributes to healthy people. We recommend more transparency, by providing the public with information on all the land removals and protections already in place. We strongly recommend that the final document be modified with this in mind.

In the attached pages, we have provided more background on why development is also needed, on land used by the minerals industry, and we offer line by line observations and suggestions on current wording in the draft document. We hope they are helpful to a new and improved draft.

Yours truly,

NWT & NUNAVUT CHAMBER OF MINES

A handwritten signature in black ink, appearing to read 'Kenny Ruptash', with a long horizontal line extending to the right.

Kenny Ruptash
President

c.c.: Hon. Caroline Cochrane, Premier of the NWT
Hon. Caroline Wawzonek, Minister of Industry, Tourism and Investment
Hon. Shane Thompson, Minister for Lands, and for Environment & Natural Resources
Pamela Strand, Deputy Minister, Industry, Tourism & Investment
Jamie Koe, Deputy Minister, Lands
Erin Kelly, Deputy Minister, Environment & Natural Resources

Chamber of Mines Detailed Comments on Draft Healthy Land, Healthy People

Thank you very much for the opportunity to comment on the draft version edition of “*Healthy Land, Healthy People, 2022-2027*”. We are pleased to provide some constructive criticisms, observations, and detailed comments on this policy document below.

Overall Constructive Criticisms:

We see several weaknesses with the policy document, including:

- The document’s title is misleading in suggesting that healthy land is key to healthy people. In fact, the Canadian government’s [Social determinants of health and health inequalities](#) indicate income, employment and education are as, or more important to healthy Canadian people as is the physical environment. This should be presented to the reader given the policy has the potential to compromise the health of northerners if this is not considered.
- We are not aware of any other GNWT policy documents that speak to the importance of land from both the economic and the environmental perspective. In the absence of other government information, this draft should be changed to do that.
- As written, this document is significantly biased to informing the reader that more conservation and protection is required in the NWT, when already approximately 30% of the territory is closed to resource development. The risk, of course, is that since resource development requires access to land, this adds pressure on the NWT’s ability to sustain its number one economic contributor, mining.
- To fill this void, this document should provide the public with more balanced information on land conservation and its implications. This is particularly important when this policy document provides a whole of government position. As currently written, it reads more like the product of just the environment department.
- The draft document’s bias adds to two other conservation biases created recently under the new Protected Areas Act. The first bias was to ignore previous Protected Area Strategy requirements to conduct resource assessments on any lands proposed for conservation to ensure economic values weren’t compromised unnecessarily; the second bias was to allow private cash donations to incent the creation of new conservation areas. This then allows the Federal Government to match those destinations, further incenting conservation initiatives.
- To add transparency and additional, important information on conservation in the NWT, we recommend that GNWT provide a complete list of land protection and conservation measures in the NWT. We have attempted a first draft in the **Appendix** at the end of this document. You’ll note that we also recommend identifying these various lands under the [IUCN’s Protected Area Categories](#), which allows comparisons to other jurisdictions.
- The document does not exercise any control on surprise conservation initiatives as occurred when the community of Délı̨nę established a 90,000 square kilometre United Nations Biosphere Reserve called Tsá Tué around Great Bear Lake. Délı̨nę did this outside of any NWT Government protected areas / conservation processes. This makes planning of land use inconsistent and unpredictable, and can have negative effects on the NWT’s future economic opportunities.

Background

The world will be a different place in the future.

Already in the North, we have seen Indigenous land claims create new and robust regulatory regimes that share the regulation and management of northern lands with Indigenous governments. Today’s regimes will protect land and water from any significant adverse environmental effects.

We have already seen improvements in non-renewable resource development technology that reduce its footprint, that reduce emissions, that ensure responsible reclamation and closure activities. And industry continues to pressure itself to improve its technology. For example, recently the Canadian Mining Innovation Council developed a bold and audacious vision for the industry called [Towards Zero Waste in Mining](#). Technological improvements will reduce industry's footprint, while at the same time allow it to continue to meet the requirement to provide significant and unprecedented socio-economic benefits that protect the social, cultural and economic well-being of residents and communities, as the Mackenzie Valley Resource Management Act so aptly describes it.

Importantly too, the vision and needs of future generations will likely not be that of past ones. For example, as Indigenous governments today realize the value of non-renewable resources under their traditional lands, we are seeing their interest growing in becoming significant participants including owner/operators in the non-renewable resource industry. It is important that an appropriate balance be in place between land removal for protection and land access for development.

Mining is good for the north

Mining is good for the north, and we need to sustain these benefits.

It is the largest private sector contributor to the NWT economy contributing directly and indirectly to upwards of 50% of the GDP in the past 2 decades. Its indirect contributions extend to other areas of the economy too, including transportation, real estate, and construction, so that the total direct and indirect contributions in a good year could approximate half of the economy (see GDP figure attached). A GNWT-ITI blog [The Good of Mining: Revenues for Public Benefits](#) quotes that "Over the past 3 years, diamond mines contributed 41% of the GNWT's corporate income, fuel, property and payroll tax revenue."

Sustaining mining benefits requires robust exploration, and access to land

While the mining industry itself can last forever, individual mines can't. Eventually the mineral resource being mined runs out. We can't afford to lose the significant benefits mining provides.

Sustaining and even growing those benefits requires robust mineral exploration so as to be able to discover high quality mineral deposits that can be mined economically and keep the benefits flowing. We have the land and the mineral potential to do that for a very long time.

Unfortunately, Federal statistics show a sharp reduction in exploration investment in the NWT over the past two decades from a 15% share of Canada's exploration expenditures to an estimated less than 2% in 2022. Shrinking land access has been a contributor.

Exploration is a high risk activity, and the odds of winning at Bingo just might be better. The odds of exploration being successful are against the explorer and only 1 in 1,000 projects generally becomes a mine. Rio Tinto economists have said that the odds of finding a world class mine are even lower with only 1 in 3,333 being successful.

Importantly to this discussion, exploration requires access to land if it is to be successful, and reducing the amount of land available through protections that exclude resource development reduces industry's ability to discover new mines.

It is important that a balanced Healthy Land, Healthy People does not unnecessarily alienate land forever from responsible resource extraction; so that the NWT can also maximize the opportunities for the land to provide for future generations.

The NWT is already over-protected from development

We are informed today by the NWT Mining Recorder's Heat Map (see Figure attached) and by the Table of Land Protections that over 30% of the Northwest Territories is unavailable to mineral exploration and mining development. This means that land protection in the NWT already exceeds by far the 17% formal protection Canada has made under Conservation 2020 to meet its international commitments. (Note this does not include areas where indigenous land claims have not been settled which adds another layer of uncertainty.)

In fact, the three proposed protected areas named in the plain language summary – Dinàgà Wek'èhodi and Ts'ude niline Tu'eyeta candidate areas, and parts of Thaidene Nënë – along with the other areas formally protected in existing and proposed national parks, national historic sites, and the biosphere reserve, total 17% of the NWT. We recommend no further protections are required under any legislation to meet international commitments.

When government speaks about protecting described parcels of land, there is a strong implication that all the other lands are not protected. This is misleading and not true. Formal protection designations are not the only protection.

The NWT has a strong legislative foundation, which Indigenous governments have helped build to ensure that strong land protections are in place.

Land and resources in the greater Northwest Territories are protected from significant adverse environmental effects by the *Mackenzie Valley Resource Management Act (MVRMA)*, legislation that grew from the Dene/Métis Agreement-in-Principle (1989), and the Gwich'in (1992), and Sahtu (1994) regional land claims. Supporting the MVRMA is a host of other acts and regulations protecting water, land and wildlife, and these too are applied with Indigenous landowner and stakeholder consultations. The protections provided by all of this legislation should ease the need for huge protected areas and contribute to the notion that economic development and environmental protection can both be achieved.

Why urging more Protected Areas is not necessary

Land is a powerful basis for life, for tradition, for culture, for the basic support system for all the planet's life. It is certainly necessary that it be protected and, in many cases, conserved. We understand and support that.

At the same time though, land is the basis for human economy, and land is essential in providing opportunities and materials to make our modern lives better.

The NWT is a good example of this.

Modern mines today are creating unprecedented benefits for residents, for northern businesses, and for public and Indigenous governments. They also make the NWT less of a ward of the state, and more economically self-reliant. Mining today is very different than in the past and is regulated under Indigenous land claims-based regulatory regimes, to protect the environment from any significant adverse environmental effects. As part of that, these mines have progressive reclamation plans and provide substantial reclamation security to ensure the land will be remediated and left safe and healthy after mining is complete. The land and residents today are benefitting from a healthy balance between land protection and beneficial development.

The draft *Healthy Land, Healthy People 2022-2027* does not provide that balance.

While we can all agree that the land should be protected, the draft policy provides a narrow focus on protecting and conserving the land. It does not provide the reader with any other information to offset this bias. We fear this biased perspective makes a seductive argument to readers that herculean efforts must still be taken to continue to conserve more and more land in the NWT.

But this is not required for several reasons.

With approximately 30% of the NWT now off limits to resource development, we believe that sufficient land has already been removed from development. Canada is trying to reach 30% nationally, and the NWT has effectively already done this.

Adding to land protection, in those areas where development can occur, it's permitted under a unique regulatory environment with an Indigenous land claims-based regulatory system that ensures that development protects the land from significant adverse environmental effects.

Some observations in support of our position:

- The total footprint of current NWT mines is very small at about 0.005% of the area of the NWT. We estimate that the total land used for mining historically in the territory amounts to less than 0.03% of the NWT's land area. These are minuscule areas.
- Under today's laws, regulations and policies, our modern mines will be reclaimed, and the land will be returned to the territory's land bank in an environmentally safe condition further reducing the small footprint of mining.
- While mineral exploration requires access to a larger quantum of land than mining to help increase discovery success, exploration's effects on the land are virtually negligible, and the actual amount of land used is still small. As of December 31, 2021, the total area of mineral claims, leases and prospecting permits was 1,925,851 hectares, equal to about 1.4% of the area of the NWT (134,610,600 hectares).
- Yet, in the face of such small pressures from exploration and mining, land that has been closed to mineral resource development today is approximately 30% of the NWT land area. See the table attached.
- Increasing the amount of land that would be off limits to mineral exploration and development reduces the opportunity to find new mines. The value created by a mine could be as high as \$1 billion per sq.km. for a world class mine like the Diavik diamond mine. We believe that sacrificing that kind of opportunity through further conservation should not be taken.
- The original NWT Protected Areas Strategy wisely required mineral assessments be conducted on candidate areas to reduce the risk of losing rare, mineral rich lands. Under the strategy, at least two candidate protected areas – Edezhie and Ts'udé Niljné Tuyeta – were reduced in size to protect high mineral potential for future generations' economic development. Similarly, mineral resource assessments remain a requirement for National Parks proposed in northern Canada. That is a good requirement.
- However, the new Protected Areas Act does not require that any mineral resources assessments be conducted before land is withdrawn for a conservation/protection area. That is not good.
- Additionally, the new Protected Areas Act biases further land conservation by incentivising land protection with cash. The Act allows environmental groups to make donations to special purpose funds for communities to access. And Canada will provide matching funding under the Canada Nature Fund. While that can be a good thing in some circumstances, it can also be a bad thing if it incentivizes more than 30% of the NWT to be off limits to development.
- A few million dollars can be a powerful incentive for communities to create more conservation areas as occurred with Thaidene Nene National and Territorial Parks. Nature United provided \$15 million, matched by the Government of Canada, to create a fund of \$30 million to advance

Thaidene Nene. While this might seem a lot of money to a small community, it is quite paltry when the loss of a single mine could be as much as \$15 Billion. Not to mention the ability for foreign interest groups to influence land use in the territory with the use of financial instruments.

- Finally, when government speaks about protecting described parcels of land, there is a strong implication that all the other lands are not protected. This is misleading and not true. Formal protection designations are not the only protection, and the document should boast of the land use regulations we practice in the north.

We believe that by staying so very focused on the continued creation of new conservation and protected areas, the current draft of Healthy Land, Healthy People creates a situation unnecessarily risky to the sustainability of the NWT's primary economic contributor, mineral resource development.

If there is a strong need to remove additional lands for conservation, the policy document should require that other lands currently off limits to development be returned to the lands available for development.

The Big Picture

NWT is a large jurisdiction, with a small population, and with a heavy and unnatural reliance on government for its economy.

Over the past 25 years, the NWT has taken significant advantage of mineral resource development to improve its private sector economy. In so doing – for the first time in its history – it has created both significant northern and Indigenous employment and business capacity, and created a new flow of resource development taxes and royalties to both public and Indigenous governments. Simultaneously, it has benefitted from this resource development to improve community and territorial infrastructure, and to reduce social assistance costs with the provision of new training and jobs.

As a result of its significant benefits, mineral resource development is the largest private sector contributor to the NWT's economy. This will not change in the foreseeable future, and this document should reflect what it is doing to ensure land use is balanced to protect that resource future.

This mineral development success is wholly dependent on access to land for exploration and mineral development. Without access to land – something which protected areas prevent – mineral resource development is not possible, nor its consequent, and very real benefits.

Land use for mining is not necessarily large.

A stunning example is the Diavik Diamond mine. It has a land footprint of approximately 15 square kilometres, from which it will have created approximately \$15 billion in diamond value. Already over



Diavik will generate \$15 billion in diamonds from a footprint of less than 15 sq.km. and will be reclaimed upon closure.

\$3 billion has been provided to Indigenous businesses, and over \$500 million in wages have gone to Indigenous workers. When the mine closes, the site will be returned to government as productive natural landscape again.

The NWT is under mapped and under-explored. We simply do not know what resources are hidden beneath the surface. One might easily imagine a proposal to develop a protected area at Lac de Gras in 1990 before anyone knew there were diamonds there. Had this occurred, the economic losses to the NWT and its residents and businesses and government from preventing diamond development would have been needlessly staggering. With diamond mines maturing and critical minerals now such a priority, we need to be more careful in deciding if lands should be removed from development.

Imagine a scenario as used with Thaidene Nene. There, the federal government matched \$15 million in funding with Nature United to fund a development fund of \$30 million protected in a trust fund from which only the annual interest and investment income will be used for Łutsël K'É's management and operational responsibilities in Thaidene Nënë.

Had this occurred in the Lac de Gras region, the economic loss to Canada and the north from preventing the Diavik mine would have been \$15 billion vs a trust fund of \$30 million, less than 1/500th of that. Of that, \$7 billion to northern and Indigenous businesses would never have materialized. And, of course, the Diavik site will be reclaimed and returned to natural use when mining is completed.

If we rush to make too much land off limits to resource development, then Indigenous northerners will unnecessarily lose out on many opportunities for them and their future generations. While we can all agree that mining should not occur everywhere, it is important that balance is maintained, particularly given that ever more stringent laws and regulations with improving technologies, can allow resources to be developed without compromising natural values.

The Current State of Conservation/Protection in the NWT

There are many, many different kinds of tools already being used to protect and conserve lands in the NWT.

Already much of the NWT is protected by not allowing mineral resource development as portrayed in the GNWT Mining Recorder's "Northwest Territories Mineral Tenure Heat Map" shown here. All the grey areas are off limits to resource development. There are additional areas that are not shown, including Banks Island Number 1 Bird Sanctuary, Tsá Tué Biosphere Reserve, and the Upper Thelon, where exploration was halted by a community.

Readers and decision makers should be aware of all of them.

They should be aware too that removing huge swaths of land from potential development can affect investment. Federal statistics show a sharp reduction in exploration investment in the NWT over the past two decades from a 15% share of Canada's exploration expenditures to an estimated less than 2% in 2022. Shrinking land access has been a contributor.

We recommend the *Health Land, Healthy People* report provide a table of those designated lands, as per the table we have drafted in the Appendix: **Formal Land Protection in the NWT: Regions where resource development will not occur.**

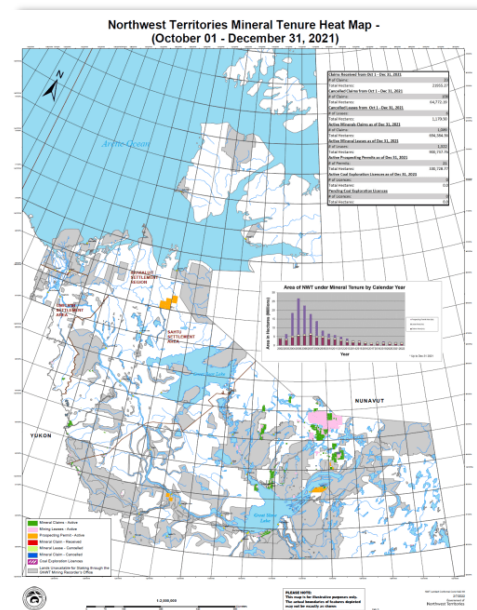


Table of Formal land protection in the NWT: Regions where resource development will not occur

IMPORTANT NOTE: These lands are demarcated by clear boundaries. It is important to the full understanding of protection to realize that these bounded areas will also restrict access to development in large quanta of land beyond their boundaries. This should also be considered in considering further protection, and in calculating NWT lands off limits to development.

PROTECTION CATEGORY (for percentages we used 1,346,106 sq.km. for NWT)	SIZE (sq.km.)	% of NWT Land Mass	Cumulativ e Total	IUCN Land Category *
Existing National Parks				
Nahanni	30,060			II
Naats'ihch'oh	4,850			II
Tuktut Nogait	16,340			II
Wood Buffalo (NWT portion)	9,350			II
Aulavik (Banks Island No. 2)	12,090			II
Sub Total:	72,690	5.40%	72,690	
Existing protected National Historic Park				
Saoyú-?ehdacho	5,570			III?
Sub Total:	5,570	0.41%	78,260	
Existing Game & Bird Sanctuaries				
Thelon Game (NWT portion)	21,400			Ib
Anderson River Delta Bird	1,020			Ib
Banks Island No. 1 Bird	19,300			Ib
Banks Island No. 2 Bird	0			Ib
Cape Parry Bird	2			Ib
Kendall Island Bird	480			Ib
Sub Total:	42,202	3.14%	120,462	
Areas Established through Land Claim Agreements				
Ezqdziti (Tłjchq Final Agreement)	1,380			III
Kelly Lake (Sahtu Final Agreement)	270			III
Sub Total:	1,650	0.12%	122,112	
Established Territorial Parks				
Hidden Lake	30			
Gwich'in Territorial Park	120			
Sub Total:	0	0.00%	122,112	
Proposed National Parks				
Thaidene Nene East Arm National Park	14,075			II
Sub Total:	14,075	1.05%	136,187	
Proposed Protected Areas Initiatives (From GNWT Website)				
Dinàgà Wek'èhodì	790			IV
Edézhíe (now National Wildlife Area)	14,200			IV
Ejìé Túé Ndáde	2,180			
Ka'a'gee Tu	9,600			

Łue Túé Sųlái	180			
Sambaa K'e	10,600			
Ts'ude niline Tu'eyeta (Ramparts)	10,100			IV
Thaidene Nënë (GNWT)	9,105			II
Thaidene Nënë Wildlife Area (GNWT)	3,120			IV
Sub Total:	59,875	4.45%	196,062	
Proposed Territorial Parks				
Doi T'oh Canol Heritage Trail	940			
Sub Total:	0	0.00%	196,062	
All parks and protected areas as % of NWT			15%	
Other Land Use Plan Conservation Zones				
Sahtu	29,770			
Deh'Cho	22,840			
Gwich'in	6,140			
Sub Total:	58,750	4.36%	254,812	
Tłjcho Land Protection Zones				
Land Use Exclusion Area (Wehexlaxodiale?)	980			
Habitat Management Zone	280			
Cultural Heritage Zone	16,685			
Traditional Use Zone	5,530			
Sub Total:	23,475	1.74%	278,287	
All parks, protected, conservation, Tłjcho areas as % of NWT			20.7%	
Others				
Upper Thelon Region closed to uranium exploration	18,000			
Sub Total:	18,000	1.34%	296,287	
Others				
Tsá Tué Biosphere Reserve (investors will shy away from this UNESCO Biosphere Reserve)	93,313	6.93%		
Sub Total:	93,313	8.27%	389,600	
All exclusion zones (not counting land claims) as % of NWT area		28.9%		

* Note: We recommend identifying these various lands using the [IUCN's Protected Area Categories](#), which allows comparisons with other jurisdictions.

Page by page detailed comments

Page	Comments
	Through the <i>High Ambition Coalition for Nature and People</i> and the <i>Global Ocean Alliance</i> , Canada is leading the way to build support for a 30 percent target internationally. See here .
3.	<p>Introduction Second paragraph What needs to be added here is that the co-management system in the NWT, although complex, has worked very well in regard to the environmental assessment, and regulation of land and water uses and mitigation of any significant adverse environmental effects. It is another tool to protect biodiversity.</p> <p>The words “the conservation network works to protect ... the ways of life of the people of the Northwest Territories” should be modified to say that “protects the <u>traditional</u> ways of life of the people.” The new ways of life of the people includes non-renewable resource development, and the conservation network actually prohibits that development.</p> <p>Third paragraph: add <u>traditional</u> in the first sentence to read “protecting lands, waters and the traditional livelihoods in the territory”</p>
3.	<p>Introduction, third paragraph We respect the participatory work that the GNWT is doing with Indigenous governments, particularly through the Inter-Governmental Council. We also believe that the MVRMA and its co-management system is more progressive and far reaching than UNDRIP.</p>
3.	<p>Conservation in the Northwest Territories Industry needs to be involved in this process of conservation. Diversification is great, we all want that, but without a base economy, you might as well turn the whole territory into a park. Stop talking just conservation and just like industry has had to do (incorporate an environmental overview of every project), start including an economic overview with every consideration of protecting land. We recognize the importance of the environment but not at the total cost of any economic development for complete conservation.</p>
4.	<p>Third paragraph: It is incorrect and misleading to say that the Protected Areas Act was developed in collaboration with industry. Industry was involved in the original Protected Areas Strategy, which actually saw a multistep process created that included assessing mineral resources before protection was established. Unfortunately, industry was just another ordinary participant like any member of the public in commenting on the Protected Areas Act, which was driven quickly into force without consideration of our two major concerns, namely the lack of necessary mineral resource assessments, and the ability to ‘fundraise’ cash for conservation.</p>
5.	<p>The report acknowledges the “often damaging history of conservation efforts on Indigenous communities.” Without balance in a land protection plan such as this, there is risk it could create a new damaging history of conservation efforts by compromising significant new economic opportunities for Indigenous northerners. We describe an example with a diamond mine in our comments.</p>
5.	<p>Indigenous leadership Here within lies the main point. Through a complex but robust co-management system in the NWT, Indigenous communities and governments have the ability to decide where economic development should be allowed. We don't need more conservation areas. What</p>

	<p>we need is an approach that considers conservation and economic development together. Creating huge areas of conservation removes any opportunity for development and reconciliation. We are a resource nation and although industry has pushed themselves to be better and to be leaders around the world regarding environmental protection, conservationists have not moved an iota in recognizing that conservation protection and economic development need to be considered together.</p>
6:	<p>National Biodiversity targets Referencing the 17% federal goal of Canada Target 1 is dated news. Canada has advanced now to a new ambitious goal. Through the <i>High Ambition Coalition for Nature and People</i> and the <i>Global Ocean Alliance</i>, Canada is leading the way to build support for a 30 percent target internationally. Update the report.</p>
6.	<p>Last paragraph: These should be considered unachievable goals, or if not will cause a huge catastrophic effect on the economy of Canada. Much of the resource potential of Canada lies in the northern Provinces or the territories. If conservation was truly an issue, rather than just looking at a plan to create a conservation economy, why not show the world what you can do by stopping huge development in the southern provinces and removing high-end farmland to building highways, housing and apartments and start conserving land where you need to conserve it. Not in the north. Practice what you preach.</p>
7.	<p>While there might be various conservation concerns, there are also significant economic concerns as diamond mining matures, and threatens Indigenous and northern employment, business and government revenues. This needs to be factored into conservation planning.</p>
7.	<p>Climate Change Provide evidence of where this is working. Increasing forest fires driven by drier summers could be one outcome of climate change. Fighting fires rather than a conservation network, might be more powerful in addressing climate change.</p>
7.	<p>Connectivity: Ecosystem fragmentation – and creation of ecological islands – will not occur in much of the NWT as it does in the provinces where there is a variety of land use pressures, from forestry to farming to ranching fencing to urban sprawl. Eg, in the tundra region where the diamond mines are located, the only likely land pressure (and it is relatively light) will be mineral exploration and perhaps development. Connectivity can be maintained.</p>
13.	<p>In regards to: An area nominated under the Protected Areas Act will be reviewed against the following criteria. Nowhere is there anything to protect high mineral potential lands from being lost to a protected area, which was a principle in the original protected areas strategy. Nothing here to ensure that a high mineral potential area is screened out, or at least given a chance for balanced second thoughts of conservation.</p>
14.	<p>Add to the first bullet: ...and all information on known and potential opportunities for mineral, oil and gas or other economic opportunities need to be identified in order to ensure that these are not compromised. Areas of high mineral potential, for example, are also rare and deserve protection for future generations.</p>