

NUNAVUT TUNNGAVIK INCORPORATED

Explanation of reliance on further documents filed

(pursuant to Board Direction #6(b))

3. “Economic Development Based on Local Resources: Commercial Harvesting of Caribou on Southampton Island”, by Brock Junkin, Department of Sustainable Development, Government of Nunavut, 2004

This source:

- reports the understanding at material times of a senior GN official, having responsibilities relating to the Coral Harbour abattoir hunt, of the relationship of that hunt to the rights of Inuit, particularly to the decision roles of the HTO and NWMB, under Article 5 of the *Nunavut Agreement*;
- provides additional evidence of several material facts asserted in the GN’s or NTI’s evidence concerning organization of the hunt, particularly the role of the HTO and the structure, mandate and role of the Coral Harbour Community Development Corporation; and
- provides additional evidence of relevant background facts concerning the context in which the *Nunavut Agreement* was entered into and, shortly thereafter, this abattoir hunt was subsidized by government.

4. “Canada-Northwest Territories Economic Development Agreements 1991-1996”

This source:

- constitutes the mandate, as reported in the GN’s documents filed, for most of the government monies provided to the Coral Harbour abattoir project at material times;
- confirms that the only instruction given in that mandate regarding the implementation of land claims agreements (including the *Inuvialuit Final Agreement* signed in 1984, long before the mandate was established) was a disclaimer, stating that nothing in the mandating Agreement shall jeopardize the position of aboriginal people respecting “any” legal obligations government “might have because of Treaties” or because of “claims thereunder, or of any other nature” (section 10.7, A. Framework Agreement, page 15);
- also provides evidence of relevant background facts concerning the context in which the *Nunavut Agreement* was entered into and, shortly thereafter, this abattoir hunt was subsidized by government.