



**NUNATSIAVUT**  
kavamanga Government

**COMMISSION OF INQUIRY RESPECTING THE MUSKRAT FALLS PROJECT**

**NOTICE OF APPLICATION**

**TO:**

**COMMISSION OF INQUIRY RESPECTING THE MUSKRAT FALLS PROJECT**

5th Floor, Suite 502, Beothuck Building

20 Crosbie Place

St. John's, NL A1B 3Y8

Telephone: 709-729-6076, Toll Free: 1-833-235-7702

Fax: 709-729-6070

Email: [admin@muskratfallsinquiry.ca](mailto:admin@muskratfallsinquiry.ca)

**The NUNATSIAVUT GOVERNMENT hereby makes Application for Standing before the Commission at Inquiry Respecting the Muskrat Falls Project and for Participant funding.**

The Grounds for the Application for Standing are:

1. The Applicant is a legal entity pursuant to the *Labrador Inuit Land Claims Agreement Act*, S.N.L. 2004 c. L-3.1, with the capacity, rights, powers and privileges of a natural person, having offices situate at 25 Ikajuktauvik Road, P.O. Box 70, Nain, NL, Canada A0P 1L0.
2. Pursuant to the *Labrador Inuit Land Claims Agreement Act*, the Labrador Inuit Land Claims Agreement has the force of law in Newfoundland and Labrador. The Agreement is a comprehensive land claims agreement and is a treaty within the meaning of section 35 of the *Constitution Act, 1982*. The Agreement recognizes a degree of self-government by the Labrador Inuit and recognizes the Nunatsiavut Government, the Applicant herein, as the representative of the Labrador Inuit.
3. The Agreement designates an approximate area of 72,520 square kilometres of land and waters in northern Labrador plus approximately 46,690 square kilometres of adjacent tidal waters as the Labrador Inuit Settlement Area (hereinafter referred to as "the Settlement Area"). Within the Settlement Area Inuit have certain specified rights including a full range of natural resource harvesting rights, as set out in Chapters 12 and 13 of the Agreement.

Toll Free: 1.866. [REDACTED] 942 Fax: 709. [REDACTED] 931

4. The Settlement Area encompasses northern Labrador and extends south to include the Inuit Community of Rigolet, Groswater Bay and roughly two-thirds of Lake Melville. A significant percentage of the Beneficiaries of the Agreement live just outside the Labrador Inuit Settlement Area in the upper Lake Melville region, which includes the Towns of Happy Valley-Goose Bay and Northwest River and the community of Mud Lake.
5. Lake Melville is used by Inuit for sustenance fishing, hunting and travel. Much of the wildlife and fish that Inuit harvest in Lake Melville move between the mouth of the Churchill River and Groswater Bay.
6. The Muskrat Falls Project negatively impacts or may negatively impact Inuit Beneficiaries living in upper Lake Melville, the Labrador Inuit Settlement Area and the exercise of Inuit rights under the Agreement.
7. The Applicant, as representative of the Labrador Inuit, is interested in and directly affected by the decision of the Government of Newfoundland and Labrador to sanction the Muskrat Falls Project.

If granted Standing the Applicant will request funding for its participation.

The Applicant wishes to be heard in Happy Valley Goose Bay, NL.

Dated at Rigolet, Newfoundland and Labrador, March 28, 2018



Darryl Shiwak,  
Minister of Lands and Natural Resources  
Nunatsiavut Government  
Address for service:

████████████████████

T: (709) ██████ 942

F: (709) ██████ 931