



Building Nunavut Together
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 Office of Premier Peter Taptuna
 Hivuliqtip Peter Taptuna Havakvingani
 Bureau du Premier ministre Peter Taptuna

The Honorable Carolyn Bennett, P.C., M.P.
 Minister of Indigenous and Northern Affairs
 24th floor, Suite 2100
 10 Wellington Street, North Tower
 Gatineau, QC K1A 0H4

March 11, 2016

RE: Nutrition North Canada (NNC)

Dear Minister Bennett,

As discussed, I am providing this letter to frame our discussions with our concerns, observations and recommendations with the Nutrition North Canada (NNC) program.

The Nutrition North Program was introduced by the Federal Conservative Government in April 2011. The program replaced the previous Food Mail Program. One of the more fundamental changes in the program was that the shippers (Airlines) received the subsidy to ship food products but with the NNC Program, it now provides the subsidy directly to the retailers.

This change has had serious repercussions across the North and Nunavut. The subsidy provided to the airlines by shipping the Food under the old Food Mail program helped seemingly to subsidize air operations. Once the subsidy went to the retailers, the Airlines saw a drop in their revenues. Thus marginal routes began losing money and thus it would seem the code share arrangements and monopolies we see now in the airline marketplace. The Airlines General tariff now only identifies General Cargo rates and not separate food and General cargo rates.

The Auditor General's Report on the NNC (AG's Report 2014) explained that the Nutrition North Canada (NNC) program now provides a **direct subsidy to the retailers**. Each community has a specific discount or subsidy amount. The subsidy is provided directly to northern retailers, food suppliers, distributors, and northern food processors through **contribution agreements** to help lower the price of nutritious foods.

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Retailers make their own supply-chain arrangements, a practice that the Department expected to keep transportation costs low. But unfortunately it would seem this loss in revenue from Nutrition North decreased Northern air service, promoted airline monopolies and increased our Northern Air fares.

The Program specifies *that retailers are responsible* for passing on the full subsidy to consumers by reducing their prices on eligible foods. Retailers submit information on what was shipped and information on food prices to the Department. Payments to retailers are based on the weight of eligible foods shipped to eligible communities. About 40 retailers, suppliers, and food processors participate in the Program. Three northern retailers have accounted for about 80 percent of the subsidy each year.

Again, from the Auditor General's 2014 review of the program, the AG pointed out that Aboriginal Affairs and Northern Development Canada **has not** identified eligible communities on the basis of need. This finding is important because it is essential that subsidized foods be healthy and that communities in need benefit from the subsidy. The AG report also went on to say that the Nutrition North Canada (NNC) program requires that retailers pass on the full subsidy to consumers through a price discount at the store.

The Department produced a manual for program recipients that specify that fully passing on the subsidy to consumer's means **that the entire amount** of the subsidy is deducted from the selling price of a food item. The Program also requires the Department to conduct compliance reviews of retailers, in order to determine whether the retailers are complying with the requirement of passing on the full subsidy to consumers, as specified in the contribution agreements.

Therefore, in order to know whether the full subsidy for an **item is** being passed on, the Department would need to know the landed cost (which includes the freight cost), the profit margin, and the selling price. It is also important to analyze the profit margin currently as well as over time: it is possible for the subsidy to reduce the landed cost of an item, but that reduction could be negated if the profit margin is subsequently increased. Margins over time would allow the Department to know that the full subsidy is being passed on.

EXAMPLES:

1. If the CO-OP ships/fly's 100 kilograms of apples and fresh produce into Arctic Bay they are eligible to claim the subsidy. The subsidy provides \$8.60 a kilograms for the cost to ship produce to Arctic Bay. The CO-OP would thus receive \$860.00 from the NNC program to ship the produce.

Hypothetically, If the CO-OP freight rate is \$7.00 a kilogram (the rate an airline might be charging them) then they would make a profit of \$160.00 on shipping the produce or in **actuality it didn't cost them anything to ship the produce to Arctic Bay.**

2. Under the old Food mail program *all* retailers paid the same cargo amount/freight rate to ship their food products to any given community (a postage stamp rate). The food mail program provided the tendered rates based on individual communities. Conversely, under NNC, *each* retailer i.e. Northern, CO-OP, or independent stores had to negotiate their own freight/cargo rates with the airlines. Larger volume shippers like the CO-OP's and Northern Stores would have received proprietary pricing as they were the volume shippers. Smaller retailers could not receive the same freight/cargo rate as the larger retailers and thus their product would then be more expensive landed in a given community. Smaller retailers as a result were not competitive.

As well, to access the subsidy, the amount of paper work, forms and authentication as well as time needed to submit the forms meant that many smaller retailers opted out of the program. The smaller retailers, stores, hotels etc. then accessed their Southern Wholesalers who applied for the discount (NNC subsidy) for them. But (the Southern Suppliers) charged extra administration fees to access the program, complete the paperwork etc. and charged that back to the smaller retailer. So in actuality, the NNC subsidy was/would not be applied in its entirety. Thus the discount availability did not make an appreciable change in retail food costs.

So, in many cases the smaller retailer would purchase product from the local dominant retailer and then sell said product in their outlet with a mark-up. The subsidy would be applied by the original retailer (again according to AG Report/AANDC could not tell if the Full subsidy was applied), but because of administrative charges, handling and other "hidden costs" the full effect of the subsidy was not apparent or so diluted, that the end result was that there was or is little savings to the consumer.

Nutrition North needs to find out / ascertain:

1. Exactly what the retailers Cargo Freight rate is (that is what the airlines charge retailers to ship with them)
2. The subsidy level per communities as identified, is it realistic? How is it currently calculated?
3. Why are only the retailers allowed to claim the subsidy? How can regular folks/customers, get access to the program.
4. The registered shippers are limited. Currently only two shippers are registered In Ottawa. For example why can't a customer purchase or order food from Loblaw's and ship that to themselves and then they get the subsidy?

5. Why is there not more monitoring of program on the cost of food products? Right now, food price points are incredibly high and this is leading to a price gauging situation for consumers.

6. The Department needs to ascertain whether the current program should be scrapped and go back to the postage stamp model. i.e. subsidizing the freight charges for customers directly instead of subsidizing the retailers/stores.

The Auditor General for Canada pointed out that: *“Overall, Aboriginal Affairs and Northern Development Canada **has not** verified whether the northern retailers pass on **the full subsidy to consumers. The Department has not required the information it needs to verify this in the contribution agreements it has signed with northern retailers. It also has not required that compliance reviews of northern retailers include analysis of profit margins in order to verify that the full subsidy is being passed on. This finding is important because passing on the full subsidy to consumers is a program requirement, and is necessary to make nutritious food more accessible and affordable to Northerners.”***

The onerous, complex and time consuming paperwork to access the subsidy has left many small Northern retailers to opt out of the program.

The consequences of Nutrition North on food security as well as in general the high cost of nutritious foods is paramount.

Recommendations

The Government of Nunavut's position is that the Department needs to overhaul the program or replace it. To assist the Department, Nunavut recommends that:

1. Actual Retail stores cargo/freight rates that are being charged by the airlines be identified. This then needs to be cross referenced with the subsidy being allowed per community to ensure **that the full subsidy** is applied at the community store level as the program guidelines stipulate.

2. Implement the program so that the subsidy can be applied at point of shipping. i.e. A consumer purchasing food in Iqaluit and shipping it to Clyde River, would be given the subsidy at the freight/cargo counter. The airline would then invoice the NNC program for the food sent. This would allow the consumer to receive the subsidy at point of shipment and benefit from the lower price of food purchased in another community. It would also allow the consumer/customer to have choices where they purchase from, i.e. Walmart, Loblaw's, Arctic Ventures or Co-op's, Northern Stores.

3. Department has to complete regular performance audits on the program and provide said information to the Government of Nunavut and release publicly.

4. Monitor shipments for shipping times. Previously under the old Canada Post program the shippers (airlines) could/would be penalized if product did not move within a given time parameter. This is not happening now. This results in product being frozen, damaged, spoiled etc. being shipped to communities.

5. Review subsidy rates in place by community for fairness and tied to actual food basket costs. *A simple way to do this would be:*

Basing a food basket on the major entry points for food into Nunavut and the North. If a basket of nutritious food based on retail cost (using Nutrition North's list of eligible products) is \$100, In Ottawa, then allowing an allowance for operation & maintenance (O&M) costs in Nunavut at 30%. The basket of food would be \$130.00. The subsidy would be based by community allowing a 5% differential plus or minus. Thus the subsidy in Pond Inlet would be based on whatever the Retail stores cost is to ship the product minus the (30% o&m cost.). The 30% allows for the operating retailers margin, cost of staffing, electricity etc. This would allow the basket of food to be retailed at \$130.00 or 30% more than the Southern Retail price in a community.

6. The Department currently needs to ascertain if the retailers pass on **the full subsidy** to consumers through the price discount at the store. The Department produced a manual for program recipients that specify that fully passing on the subsidy to consumer's means that the entire amount of the subsidy is deducted from the selling price of a food item. The Program also requires the Department to conduct compliance reviews of retailers, in order to determine whether the retailers are complying with the requirement of passing on the full subsidy to consumers, as specified in the contribution agreements.

Therefore, in order to know whether the full subsidy for an item is being passed on, the Department would need to know the **landed cost (which includes the freight cost)**, the profit margin, and the selling price. It is also important to analyze the profit margin currently as well as over time: it is possible for the subsidy to reduce the landed cost of an item, but that reduction could be negated if the profit margin is subsequently increased. Monitoring variations in profit margins over time would allow the Department to know that the full subsidy is being passed on.

7. Currently an onerous, complex and time consuming amount of paper work has to be completed to access the subsidy. This has resulted in many of the smaller Northern Retailers to directly opt out of the program and pass the subsidy indirectly to Southern wholesalers. Streamline the process for receiving the subsidy and make it more user friendly and less time consuming and or have the subsidy applied at point of shipping.

Summary

There is much room for improvement in the NNC program. Public Money spent for public good has to be accountable to the public. At this time, NNC is not an accountable program. Unintended consequences for example in the Northern Air industry and the creation of a cartel-like monopoly for perishable food in Northern Canada controlled by large retailers and wholesalers have been the result. The cumbersome paper work has resulted in many of the North's smaller retailers to opt out of the program.

I have attached to this letter an example of food surveys that the GN does on a regular basis and we can provide this information to your department to help facilitate and illustrate the Nunavut Food Basket costs. Overall, the cost of the 24 select items in Nunavut **increased by 6.2%** (or **\$155.66 to \$165.31**) from March 2013 to March 2015.

The Government of Nunavut will work with the Government of Canada to help "fix" the program to benefit Nunavummiut and all Northerners.

I look forward to your review and response to our suggestions and recommendations.

Sincerely,



Peter Taptuna, M.L.A.
Premier, Nunavut

CC: Hon. Hunter Tootoo, P.C. M.P.
Government of Nunavut Cabinet Ministers

StatsUpdate

Topic:

2015 Nunavut Food Price Survey

Comparison of 24 Select Food Items, by Community
Released by the Nunavut Bureau of Statistics – August 2015

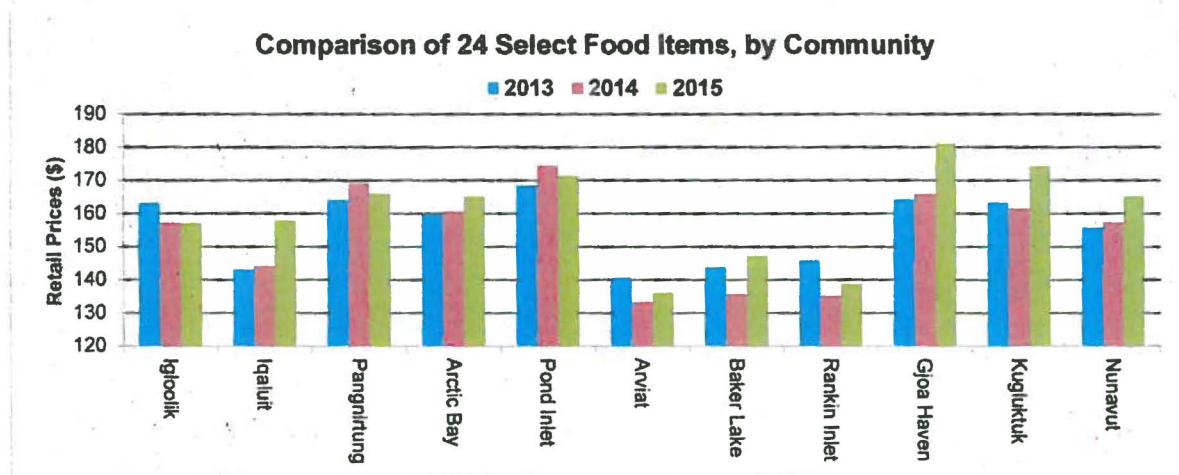
Background:

In March 2015, the Nunavut Bureau of Statistics (NBS) conducted Food Price Survey in all 25 communities of Nunavut. Prices of 133 items, including 18 non-food items, were collected by Government Liaison Officers.

This release focuses on changes in the prices of 24 select items over time, among the 10 communities that were first surveyed in 2013. NBS will shortly release detailed tables providing the average price of each item surveyed in all Nunavut communities.

In 2015, Nunavummiut in Gjoa Haven (\$181.24) could expect to pay the highest price for the 24 select grocery items, followed by Kugluktuk (\$174.39). Overall, the cost of the 24 select items in Nunavut increased by 6.2% (or \$155.66 to \$165.31) from March 2013 to March 2015. Prices in Iqaluit, Arctic Bay and Gjoa Haven also increased over the same period, while Igloolik prices decreased. Prices of the select items in Arviat, Baker Lake, Rankin Inlet and Kugluktuk decreased from 2013 to 2014 and then increased again in 2015. In contrast, Pangnirtung and Pond Inlet prices increased from 2013 to 2014 and then decreased in 2015.

Details:



Notes:

1. The 24 Select Food Items Basket includes: 2% Milk (2L), Margarine (454g), Eggs (12 Large), Potatoes (2.27kg), Carrots (1kg), Bananas (1kg), Apples (1kg), Canned Baked Beans (398ml), Soda Crackers (450g), Canned Cream of Mushroom (284ml), Ground Beef (1kg), Pork Chops (1kg), Wieners (450-500g), Canned Pink Salmon (213g), White Bread (570g), Frozen Pizza (One Unit), Frozen Corn (750g), Baby Food in Jars (128ml), Macaroni and Cheese Dinner (200-225g), Spaghetti Noodles (500g), Quick Oatmeal (900g-1kg), Instant Rice (700g), Frozen French Fries (650g-1kg), White Flour (2.5kg).
2. Nunavut price is the average price of each selected item for all reporting Nunavut communities.
3. Prices in the Nunavut Food Price Survey were collected in March of 2013, 2014 and 2015.
4. For the complete tables showing food prices for all 25 Nunavut communities, see the releases – "2015-2014 Nunavut Food Price Survey, Comparison of 24 Select Food Items Basket" and "2014-2013 Nunavut Food Price Survey, Comparison of 24 Select Food Items Basket" by visiting the Nunavut Bureau of Statistics Website at: <http://www.stats.gov.nu.ca/en/home.aspx>.



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Hivuliqtip Peter Taptuna Havakvingani
Bureau du Premier ministre Peter Taptuna

The Right Honourable Justin Trudeau
Prime Minister of Canada
House of Commons
Ottawa, ON K1A 0A6

JUN 05 2017

The Honourable Carolyn Bennett, P.C., M.P.
Minister of Indigenous & Northern Affairs
Terrasses de la Chaudière
10 Wellington, North Tower
Ottawa, Ontario K1A 0H4
carolyn.bennett@parl.gc.ca

RE: Nutrition North Canada (NNC)

Dear Prime Minister Trudeau and Minister Bennet,

I am writing again and re-submitting the Government of Nunavut's recommendations and observations on the Nutrition North Canada program. It is disheartening that again after Auditor General's (AG) reports, internal and external reviews, public meetings and several letters from this government, no changes to fix the underlying issues have occurred or any indication coming from Indigenous and Northern Affairs Canada (INAC) that the program will be fixed.

The Nutrition North Program was introduced by the Federal Conservative Government in April 2011. The program replaced the previous Food Mail Program. One of The more fundamental changes in the program **was** that the shippers (Airlines) received the subsidy to ship food products but with the Nutrition North Program, it **now** provides the subsidy directly to the retailers.

The Auditor Generals 2014 Report on the Nutrition North Canada Program explained that the Nutrition North Canada (NNC) program now provides a **direct subsidy to the retailers**. Each community has a specific discount or subsidy amount. The subsidy is provided directly to northern retailers, food suppliers, distributors, and northern food processors through **contribution agreements** to help lower the price of nutritious foods. Retailers make their own supply-chain arrangements, a practice that the Department

expected to keep transportation costs low. But unfortunately it would seem this loss in revenue from NNC decreased Northern air service revenue through cargo shipments, promoted airline monopolies and increased our Northern Air fares.

The Program specifies *that retailers are responsible* for passing on the **full** subsidy to consumers by reducing their prices on eligible foods. Retailers submit information on what was shipped and information on food prices to the Department. Payments to retailers are based on the weight of eligible foods shipped to eligible communities. About 40 retailers, suppliers, and food processors participate in the Program. **Three** northern retailers have accounted for about 80 percent of the subsidy each year.

Again, from the Auditor General's 2014 review of the program, the AG pointed out that Indigenous and Northern Affairs Canada (INAC) **has not** identified eligible communities on the basis of need. This finding is important because it is essential that subsidized foods be healthy and that communities in need benefit from the subsidy. The AG report also went on to say that the NNC program requires that retailers pass on the **full** subsidy to consumers through a price discount at the store.

The Department produced a manual for the program recipients that specifies that fully passing on the subsidy to consumers means **that the entire amount** of the subsidy is deducted from the selling price of a food item. The Program also requires the Department to conduct compliance reviews of retailers, in order to determine whether the retailers are complying with the requirement of passing on the full subsidy to consumers, as specified in the contribution agreements.

Therefore, in order to know whether the full subsidy for an **item is** being passed on, the Department would need to know the landed cost (which includes the freight cost), the profit margin, and the selling price. It is also important to analyze the profit margin currently as well as over time: it is possible for the subsidy to reduce the landed cost of an item, but that reduction could be negated if the profit margin is subsequently increased. Margins over time would allow the Department to know that the full subsidy is being passed on.

EXAMPLES:

1. If the CO-OP ships/flys 100 kilo's of apples and fresh produce into Arctic Bay they are eligible to claim the subsidy. The subsidy provides \$8.60 a kilo for the cost to ship produce to Arctic Bay., The CO-OP would thus receive \$860.00 from the nutrition North program to ship the produce.

If CO-OP freight rate is \$7.00 a kilo (the rate an airline might be charging them) then they would make a profit of \$160.00 on shipping the produce or in **actuality it didn't cost them anything to ship the produce to Arctic Bay.**

2. Under the old Food mail program *all* retailers paid the same cargo amount/freight rate to ship their food products to any given community (a postage stamp rate). The food mail program provided the "open" tendered rates based on individual communities. Conversely, under NNC, *each* retailer i.e. Northern, CO-OP, or independent stores had to negotiate their own freight/cargo rates with the airlines. Larger volume shippers like the CO-OP's and Northern Stores would have received proprietary pricing as they were the volume shippers. Smaller retailers could not receive the same freight/cargo rate as the larger retailers and thus their product would then be more expensive landed in a given community. Smaller retailers as a result were not competitive.

As well, to access the subsidy, the amount of paper work, forms and authentication as well as time needed to submit the forms meant that many smaller retailers opted out of the program. The smaller retailers, stores, hotels etc., then accessed their Southern Wholesalers who applied for the discount (NNC subsidy) for them. But (the Southern Suppliers) charged extra administration fees to access the program, complete the paperwork etc. and charged that back to the smaller retailer. So in actuality, the NNC subsidy was/would not be applied in its entirety. Thus the discount availability did not make an appreciable change in many instances.

This included any business that dealt with food products, so Hotels, smaller retail stores, quick food establishments, restaurants etc. would have to then pass on those administration charges and increases to the consumer, through the pricing of the product. As well, they would also pay a higher rate to ship their product because they did not have the volume of the larger retailers.

So, in many cases the smaller retailer would purchase product from the local dominant retailer and then sell said product in their outlet with a mark-up. The subsidy would be applied, but because of administrative charges, handling and other "hidden costs" the full effect of the subsidy was not apparent or so diluted, that the end result was that there was or is little savings to the consumer.

Nutrition North needs to find out / ascertain:

1. Exactly what the retailers Cargo Freight rate is (that is what the airlines charge retailers to ship with them)
2. The subsidy level per communities as identified, is it realistic? How is it currently calculated?
3. Why are only the retailers allowed to claim the subsidy? How can regular folks/customers, get access to the program.
4. The registered shippers are limited. Currently only two shippers are registered In Ottawa. For example why can't a customer purchase or order food from Loblaws and ship that to themselves and then they get the subsidy?

5. Why is there not more monitoring the actual community retail cost of food products to ensure that gouging is not occurring?

6. The Department needs to ascertain whether the current program should be scrapped and go back to the postage stamp model. i.e. subsidizing the freight charges for customers directly instead of subsidizing the retailers/stores.

The Auditor General for Canada pointed out that: *“Overall, Aboriginal Affairs and Northern Development Canada **has not** verified whether the northern retailers pass on **the full subsidy to consumers. The Department has not required the information it needs to verify this in the contribution agreements it has signed with northern retailers. It also has not required that compliance reviews of northern retailers include analysis of profit margins in order to verify that the full subsidy is being passed on. This finding is important because passing on the full subsidy to consumers is a program requirement, and is necessary to make nutritious food more accessible and affordable to Northerners.”***

The onerous, complex and time consuming paperwork to access the subsidy has left many small Northern retailers to opt out of the program.

The consequences of Nutrition North on food security as well as in general the high cost of nutritious foods is paramount.

Recommendations:

The Government of Nunavut's position is that the Department needs to overhaul the program or replace it. To assist the Department, The Government of Nunavut recommends that:

1. Actual Retail stores cargo/freight rates that are being charged by the airlines be identified. This then needs to be cross referenced with the subsidy being allowed per community to ensure **that the full subsidy** is applied at the community store level as the program guidelines stipulate.

2. Implement the program so that the subsidy can be applied at point of shipping. i.e. A consumer purchasing food in Iqaluit and shipping it to Clyde River, would be given the subsidy at the freight/cargo counter. The airline would then invoice the Nutrition North program for the food sent. This would allow the consumer to receive the subsidy at point of shipment and benefit from the lower price of food purchased in another community. It would also allow the consumer/customer to have choices where they purchase from, i.e. Walmart, Loblaw's, Arctic Ventures or Co-Op's.

3. INAC *has* to complete regular performance audits on the program and provide said information to the Government of Nunavut and other stakeholders and release said information publically.

4. Monitor shipments for shipping times. Previously under the old Canada Post program the shippers (airlines) could/would be penalized if product did not move within a given time parameter. This is not happening now. This results in product being frozen, damaged, sour milk etc. being shipped to communities.

5. Review subsidy rates in place by community for fairness and tied to actual food basket costs. *A simple way to do this would be:*

Basing the food basket price at the major entry points for food going into Nunavut and the North. If a basket of nutritious food based on retail cost (using Nutrition North's) list of eligible products) is \$100, In Ottawa, then allowing an allowance for operation & maintenance (O&M) costs in Nunavut at 30%. The basket of food would be \$130.00. The subsidy would be based by community allowing a 5% differential plus or minus. Thus the subsidy in Pond Inlet would be based on whatever the Retail stores cost is to ship the product minus the (30% O&M cost.). This would allow the basket of food to be retailed at \$130.00 or 30% more than the Southern Retail price in a community.

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7. Currently an onerous, complex and time consuming amount of paper work has to be completed to access the subsidy. This has resulted in many of the smaller Northern Retailers to directly opt out of the program and pass the subsidy indirectly to Southern wholesalers.

INAC has to Streamline the process for receiving the subsidy and make it more user friendly and less time consuming and or have the subsidy applied at point of shipping.

Summary

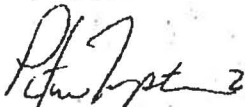
The NNC is broken. Public Money spent for public good has to be accountable to the public. NNC is not an accountable program and unintended consequences for example in the Northern Air industry and the creation of a cartel-like monopoly for perishable food in Northern Canada controlled by large retailers and wholesalers.

The cumbersome paper work has resulted in many of the North's smaller retailers to opt out of the program and allow wholesalers to collect the Nutrition North subsidy and charge administrative fees to the smaller retailer.

The Government of Nunavut will work with the Government of Canada to help "fix" the program to benefit Nunavummiut and all Northerners.

I look forward to your review and response to our recommendations.

Sincerely,



Peter Taptuna, M.L.A.
Premier of Nunavut

CC: Cabinet Ministers, Government of Nunavut