



Tammaqtailinahuarniriit anngutighat atuqhugit Inuit qaujimajatuqangillu ilihmaniillu ilitquhiannin
Conserving wildlife through the application of Inuit Qaujimajatuqangit and scientific knowledge

The Honourable Gail Shea
Minister of Fisheries and Oceans
15th Floor, Centennial Towers
200 Kent Street
Ottawa, Ontario
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Other than separating the Atlantic Cod's arctic populations into two separate units in April 2010, it is not clear to the NWMB how the 2010 COSEWIC assessment has made progress on the issues identified above. The *Species at Risk Act* recognizes that *the traditional knowledge of Aboriginal peoples of Canada*

should be considered in the assessment of which species may be at risk and in developing and implementing recovery measures. The NWMB is therefore requesting a response from your Department outlining adequate Aboriginal Traditional Knowledge (ATK) included in the 2010 assessment and evidence that supports a decline in any of the Arctic lakes populations of Atlantic Cod. In addition, the 2010 assessment lists the following reasons for the status designation of *Special Concern*:

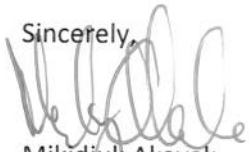
"This designatable unit (DU) exists in 3 isolated lakes on Baffin Island, Nunavut, of which the combined surface area is less than 20 km². Rescue from other DUs is not possible. One of the lakes, Ogac Lake, is accessible for fishing and large numbers of the species may be removed from the lake if fishing increases."

It is the NWMB's understanding that ATK indicates the existence of additional landlocked populations of Atlantic Cod on Baffin Island, as identified by members of the local HTOs (at NWMB Regular Meeting 64 in Pangnirtung, June 19-24 and NWMB Regular Meeting 65 in Iqaluit, September 14-16). Due to this potential and a lack of information, it is the NWMB's recommendation that the listing process *not* proceed at this time, and that DFO work with the local communities to confirm the existence of additional landlocked populations of Atlantic Cod on Baffin Island.

Further on this, the NWMB has a concern with regards to the *Species at Risk Act Consultation Workbook on the proposed addition of the Atlantic Cod (Arctic Lakes populations) to the List of Wildlife Species at Risk as Special Concern*. Part 1 of the workbook provides general background information on the federal *Species at Risk Act* (SARA), and explains how a species is added to the List of Wildlife Species at Risk, and what happens once that occurs. The *Species at Risk Act* recognizes that *"the roles of aboriginal peoples of Canada and of wildlife management boards established under land claims agreements in the conservation of wildlife in Canada are essential"*. The process described in the workbook however does not recognize the *Memorandum of Understanding to Harmonize the Designation of Rare, Threatened and Endangered Species Under the Nunavut Land Claims Agreement and the Listing of Wildlife Species at Risk Under the Species at Risk Act*, or the important role of the NWMB in the listing decision-making process. Additionally, the workbook states that if the listing is approved, a management plan will be required within three years of the species being added to the SARA list, which may include restriction of recreational fishing in areas where the species is known to occur. It is important to note that any management plan developed, as well as any proposed restrictions on Inuit harvesting, would have to be approved by the NWMB. Given that this designatable unit (DU) is entirely contained within Nunavut and the workbooks have been distributed to Inuit and other Aboriginal organizations, the listing process should be accurately described as it exists in Nunavut.

Should you or your staff require further clarification or have any concerns pertaining to the rationale put forth in this letter, please do not hesitate to contact the NWMB.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mikidjuk Akavak', written over the word 'Sincerely,'.

Mikidjuk Akavak
Chairperson of the
Nunavut Wildlife Management Board

Cc: Sam Stephenson, Species at Risk Program, Fisheries and Oceans Canada