

May 27, 2016

Daniel Shewchuk, Acting Chair
Nunavut Wildlife Management Board
Box 1379
Iqaluit, NU X0A 0H0
Email: receptionist@nwmb.com

Via Email
receptionist@nwmb.com

Re: Public Hearing of the Nunavut Wildlife Management Board to Consider a Total Allowable Harvest for Nunavut Harvesters of the Bluenose-East Caribou Herd

Dear Mr. Shewchuk:

The following comments are submitted on behalf of the Wek'èezhì Renewable Resources Board (WRRB), to be considered during the Nunavut Wildlife Management Board's (NWMB) public hearing for the Bluenose-East caribou herd, scheduled for June 16-17, 2016 in Cambridge Bay, NU. The Board wishes to thank the NWMB for granting the WRRB 'witness' status at the hearing, which permits the Board to make a presentation, respond to any questions, and observe the remainder of the hearing.

The WRRB has a mandate for wildlife, plant and forest management in Wek'èezhì and adheres to the principles and practices of conservation in fulfilling its duties. The Board shares responsibility for managing and monitoring the Bluenose-East caribou herd. The Board's comments provide the NWMB with additional information about the involvement of the WRRB in management of the Bluenose-East caribou herd in the Northwest Territories (NWT), specifically Wek'èezhì, and Nunavut.

Bluenose-East Caribou Herd Management in NWT

Since its inception in 2006, the WRRB has been invested in managing barren-ground caribou. The Board has conducted two proceedings to address Bluenose-East caribou harvest limitations in 2010 and 2016 for a herd that has continued a declining trend since 2009. Reports from the 2010 proceedings and Government of the Northwest Territories (GNWT) and Tłı̨chǫ Government (TG) responses are available on the WRRB website.

2016 Proceeding

In December 2015, TG and the Department of Environment and Natural Resources (ENR), GNWT submitted the *Joint Proposal on Management Actions for Bluenose-East Caribou 2016-2019* to the Board, which proposed new restrictions on hunter harvest, predator management and

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ongoing biological monitoring. More specifically, TG and ENR proposed implementing a total allowable harvest and allocation for the Bluenose-East caribou herd and conducting a feasibility assessment of a full range of wolf management actions. The WRRB considers any specific restriction of harvest or component of harvest by way of a quota as the establishment of a total allowable harvest (TAH). The WRRB complied with Section 12.3.10 of the Tłchq Agreement and held a public hearing in Behchokò, NT on April 6-8, 2016.

As per Section 12.5.5(a)(i) of the Tłchq Agreement, the WRRB has sole responsibility for making a final determination with respect to a TAH for a population or stock of wildlife in Wek'èezhìi. In order to allow careful consideration of all of the evidence on the record and to meet legislated timelines, the WRRB has decided to prepare two separate reports to respond to the proposed management actions in the joint management proposal. The final Reasons for Decision report, Part A, will be submitted to TG and ENR on June 10, 2016. It will deal with the governments' request for a TAH and allocation for the Bluenose-East caribou herd. Part B will deal with additional predator management actions, biological and environmental monitoring, and cumulative effects and will be submitted at the end of August 2016.

In anticipation of the proposal, the Sahtú Renewable Resources Board (SRRB) and the WRRB signed a *"Memorandum of Understanding Regarding Collaborative Efforts for the Management of the Bluenose-East Caribou Herd"* in October 2015. While each Board conducted its own proceeding, including a public hearing in both the Sahtú and Wek'èezhìi, the SRRB and WRRB developed a cooperative framework and approach in order to minimize duplication, increase consistency and ensure management of the Bluenose-East caribou herd is as effective as possible. The SRRB is expected to submit its final Reasons for Decision Report on June 20, 2016. The memorandum of understanding and evidence from both the SRRB and WRRB public hearings can be found on the Board's website.

Long-term Management Planning

Further, the Board has participated in long-term management planning processes for the Bluenose caribou herds with the Advisory Committee for Cooperation on Wildlife Management (ACCWM). The ACCWM was established to exchange information, help develop cooperation and consensus, and make recommendations regarding wildlife and wildlife habitat issues that cross land claim and treaty boundaries. The committee consists of wildlife management boards from the NWT and Nunavut: Wildlife Management Advisory Council (NWT), Gwich'in Renewable Resources Board, Sahtú Renewable Resources Board, Kitikmeot Regional Wildlife Board, Tuktut Nogait National Park Management Board, and Wek'èezhìi Renewable Resources Board.

The ACCWM decided to develop a plan for the Cape Bathurst, Bluenose-West, and Bluenose-East barren-ground caribou herds to address caribou management and stewardship over the long term. The *"Taking Care of Caribou: the Cape Bathurst, Bluenose-West, and Bluenose-East Barren-ground Caribou Herds Management Plan"* was developed in consultation with most of

the communities that harvest from the three herds. The management goals are to maintain herds within the known natural range of variation, conserve and manage caribou habitat, and ensure that harvesting is respectful and sustainable. Submitted to TG, GNWT and the Government of Nunavut in November 2014, the Management Plan is a working document used in developing specific management tools such as Action Plans for Cape Bathurst, Bluenose-West, and Bluenose-East barren-ground caribou. The Action Plans are currently being developed by the ACCWM, with the Bluenose-East Caribou Herd Action Plan to be submitted to governments in summer of 2016.

Bluenose-East Caribou Herd Management in Nunavut

While the WRRB's involvement in management processes in Nunavut has been limited, the Board has submitted comments to both the Nunavut Planning Commission (NPC) and the Nunavut Impact Review Board (NIRB) related to the Bluenose-East caribou herd.

On June 9, 2015, the WRRB forwarded the following position to the NPC: *“the Bathurst and Bluenose-East calving and post-calving grounds should be areas where no exploration or development occurs at any time, as those areas are of the utmost importance to the health and sustainability of both herds”*. While the Board believes that all parts of barren-ground caribou annual range warrant some level of protection, the WRRB believes the calving and post-calving grounds should receive the highest level of protection. In the Board's view, these areas should have no exploration or development on them at any time, as they are of significant importance for caribou.

The WRRB also provided comment to the NIRB, on May 4, 2015, for the proposed Tundra Copper Corporation “Coppermine” Exploration Project proposal, recommending that the proposed project not be permitted to go forward as planned as the project would be situated in an area where at least six wildlife species are of conservation concern; one of which, the Bluenose-East caribou herd, is especially valued by Tłı̄ch̄ and other Aboriginal peoples as a subsistence and culturally important species. The Board noted that the Bluenose-East calving grounds should be an area for no exploration or development at any time, as they are significantly important for caribou ecology both spatially and temporally.

Conclusion

Since the Bluenose-East caribou herd has continued to decline since 2009, the Board believes that all peoples who harvest the herd must do their part to ensure the herd's recovery. Users and managers must act now, in whatever ways possible, to protect the herd so future recovery may be possible. With the possibility of harvest limitations for the Bluenose-East caribou herd in the NWT, the WRRB encourages the NWMB to take a similar approach to the protection of Bluenose-East caribou in Nunavut.

The WRRB looks forward to continuing a collaborative relationship with the NWMB regarding barren-ground caribou. If you have any questions, please contact the office at (867) 873-5740 or jpellissey@wrrb.ca.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Grant Pryznyk". The signature is fluid and cursive, with the first name "J. Grant" and last name "Pryznyk" clearly distinguishable.

J. Grant Pryznyk
Chair

Attachment

Cc Jason Akearok, Executive Director, NWMB
Hon. Wally Schumann, Minister, ENR
Ernie Campbell, Deputy Minister, ENR
Lynda Yonge, Director of Wildlife, ENR
Grand Chief Eddie Erasmus, TG
Laura Duncan, Tłıchq Executive Officer, TG