



January 24, 2007

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Qikiqtaaluk

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Arctic Bay
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Qikiqtarjuaq
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Cape Dorset
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Clyde River
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Grise Fiord
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Hall Beach
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Igloolik
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Iqaluit
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Kimmirut
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Pangnirtung
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Pond Inlet
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Resolute Bay
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Sanikiluaq

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Kivalliq

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Arviat

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Baker Lake

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Chesterfield Inlet

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Coral Harbour
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Rankin Inlet
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Repulse Bay
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Whale Cove

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Kitikmeot

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Cambridge Bay

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Kugluktuk
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Gjoa Haven
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Kugaaruk
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Taloyoak

Joe Tigullaraq
Chairperson
Nunavut Wildlife Management Board
Iqaluit, Nunavut
X0A 0H0

Dear Joe:

Re: Time for response to GN proposals for Muskox Total Allowable Harvests (TAHs) and related limitations

I am writing to request that the NWMB extend the period that has been provided to parties wishing to respond to the muskox TAH package filed by the GN.

Translated responses are currently due by January 29. NTI requests that a further 30 days be given in light of several considerations that make the task of reviewing the GN's submission and preparing an effective response on behalf of Inuit particularly challenging, as follows:

1. By their nature, the GN's proposals to establish TAHs for muskox are exceptionally far-reaching and complex. TAHs would be established for the first time on muskox distributed throughout most of Nunavut, divided into 19 populations. Although not yet specified, BNL allocation responsibility would differ for several populations as between HTOs, RWOs, and possibly joint RWOs. The package also includes a season for most populations that would have differential impacts on Inuit harvesters, depending whether they harvest on the mainland or in the High Arctic.
2. The GN current submission consists of a large amount of material (four main documents, totaling approximately 90 pages (English version)). This is additional to the August 06 muskox population estimates and surveys and High Arctic muskox density and abundance estimates, and June 06 muskox population estimates for Ellesmere Island filed previously by the GN, which respondents also have to consider.
3. Much of the GN material is biological data and analysis, requiring examination by NTI's biologist and in many cases review of numerous further studies cited. In order to prepare a response on behalf of Inuit, NTI must integrate its biologist's input with the information and direction contributed by other NTI staff members. At this time NTI's biologist estimates that he has reviewed more than 400 pages of material in preparing his contribution to NTI's response, and he has not completed his review. His review is expected to be approximately 20 pages long.

4. The GN submission is substantially different from the initial submission contained in the GN's December 2005 TAH report, previously filed. Also, the new submission differs considerably from what NTI and other parties reasonably expected based on the GN's explanation of the intended changes given at the first session of Special Meeting Twelve in September.¹ Compared to the initial submission, the new position is more restrictive in several ways. For example, rather than the 13 populations reflected in the initial submission and associated draft TAH order, 19 populations are now proposed. (When wildlife is divided into smaller populations for TAH purposes, Inuit harvesting access and HTO authority to allocate tags are restricted.) Also, seasons are proposed for High Arctic muskox where none were proposed previously, and some TAHs that had been increased following the public consultations have been reduced. These changes make it critically important that NTI have full opportunity to scrutinize the package on behalf of Inuit.
5. The GN submission is still not complete. The justification for prohibiting any harvesting of the newly designated muskox population whose range coincides with the boundaries of the Thelon Game Sanctuary, indicated as being filed "as soon as possible" in the GN's December 20 letter, has not been filed. (It is most likely that NTI will submit that this issue should be dealt with by the NWMB in its separate decision process respecting the Sanctuary, but if the GN has a population-based rationale for prohibiting the harvesting of these muskox while allowing substantial harvesting of all neighbouring populations, NTI will require sufficient time to respond.) Also, a revised draft TAH order has not been provided. The draft orders and regulations proposed by the Government have proven to be important in this process, because they provide a reference to rely on if there are inconsistencies in other material, and they often confirm important implementation detail that is not easily obtained elsewhere. For example, the previous draft muskox TAH order outlined the allocation responsibilities for the BNLs that would follow; this information is not provided with the current package.
6. Because the package is more restrictive in a number of ways than what community representatives had expected following the public consultations, NTI has found it necessary to try to consult with HTOs and RWOs more extensively than anticipated. (Of course, NTI does not view these efforts as substituting for government's responsibility.) In some cases, feedback was not available to NTI until mid-January.
7. The GN has indicated that "should the NWMB decide to allow more time for this process, ... leaving [the existing muskoxen management regime] in place will not cause a wildlife management concern" (GN December 20 letter to NWMB). NTI is not aware of any prejudice that the additional thirty days requested would cause for the NWMB's decision process, assuming that the NWMB might add the time

¹ The GN indicated in September that the elements of the muskox package that had been relaxed as a result of the public consultations would either be retained or made more advantageous to Inuit harvesters in the next proposal. See transcript of Special Meeting 12A, page 357(19-21) and page 376 (5-11). The GN also indicated that part of the purpose of the postponement would be to obtain NTI's help in developing a new regime that benefits hunters (pages 224-225 (24-8)).

requested either within the timeframe of Special Meeting Twelve or, as intended in September, by completing Special Meeting Twelve before deciding on the new muskox package. In light of the fact that the GN's proposed new muskox harvesting season does not open until October, the additional time would not hold back any substantial benefit from Inuit harvesters that the GN is currently offering.

In making this request on behalf of NTI, I assure you that NTI's staff and advisors are making their best efforts to assist the Board in maintaining a reasonable schedule in this process. We would not make this request unless in NTI's view the additional time requested were necessary to NTI's effective representation of Inuit. A well considered response by NTI can also assist the Board in making the best decisions possible on these complex issues.

Please reply to this request as soon as possible. Thank you.

Sincerely,



Joe Adla Kunuk,
Chief Executive Officer,
Nunavut Tunngavik Incorporated

CC Simon Awa, Deputy Minister of Environment, Government of Nunavut
Steve Pinksen, Director, Policy, Planning, and Legislation, Government of
Nunavut
HTOs and /RWOs