



April 8, 2016

Daniel Shewchuk,
Acting Chairperson
Nunavut Wildlife Management Board
P.O. Box 1379,
Iqaluit, NU
X0A 0H0

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Dear Chairperson:

Re: Public Hearings of the Nunavut Wildlife Management Board (Board) to consider regional total allowable harvests for the Bluenose East and Bathurst caribou herds

Nunavut Tunngavik Incorporated (NTI) has received the Board's April 1, 2016 letters announcing public hearings to consider the Government of Nunavut's proposals that the Board establish Total Allowable Harvests (TAHs) for the Bluenose East and Bathurst caribou populations.

Recognizing that the Board has invited written submissions on the TAH proposals by May 13, 2016, I am writing to raise two closely related issues on which the Board's early response would benefit all parties.

1. *Reservation of any TAH to Inuit pending the Board's striking of the Basic Needs Level*

The Board's public hearing announcements do not refer to the striking of the Basic Needs Level (BNL) for these caribou populations. Under the Nunavut Agreement, the BNL constitutes the first demand on any TAH and is reserved to Inuit. As NTI has noted in previous submissions to the Board regarding TAHs for Southampton Island and Baffin Island caribou, the Agreement presumes that the BNL will be struck by the time any TAH is implemented. For this reason it has been NTI's position that the Board should, as a rule, make BNL decisions at the same time and in the same process as TAH decisions.

NTI recognized that exceptional circumstances surrounding the establishment of TAHs and BNLs for Southampton Island and Baffin caribou made it advisable for the Board to postpone those BNL decisions until after the TAHs had been implemented. The foundation of NTI's support for this approach was that the TAHs would be reserved entirely to Inuit pending the striking of the BNLs. This occurred in both cases.

In his email communication with NTI's Wildlife Director on April 7, the Board's Executive Director explained that the Board plans to postpone its BNL decisions for Bluenose East and Baffin caribou, and he outlined the Board's reasoning. In response, I confirm that NTI does not

object to such a postponement provided that any TAHs established by the Board will be reserved entirely to Inuit pending the striking of the BNLs. Please confirm that such a reservation will be a condition of any Board decision establishing TAHs for these populations on the basis of the upcoming public hearings.

2. *Location of the public hearings*

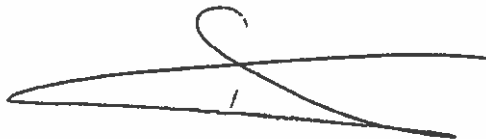
The Board has announced that these public hearings will be held in Yellowknife, Northwest Territories. Under the Nunavut Agreement, the Board is required to convene its meetings in Nunavut whenever practicable. A further Agreement directive, which is very important when the Board is considering a TAH on a wildlife population for the first time, is that wildlife management “invites public participation and promotes public confidence, particularly amongst Inuit”.

For these reasons NTI proposes that the Board move the planned locations of these public hearings to Kugluktuk, Nunavut, in the case of the TAH for Bluenose East caribou, and to Cambridge Bay, Nunavut in the case of the TAH for Bathurst caribou.

By copy of this letter, NTI asks the GN to submit to the Board by April 15, 2016 any comments the GN has on NTI’s position that the Board should 1) undertake to reserve any TAH to Inuit pending striking of the BNL and 2) relocate the public hearings. NTI recognizes that this is a tight timeframe but considers it necessary in view of the importance of timely TAH decisions in these proceedings and the importance of the issues raised in this letter.

NTI looks forward to the Board’s reply as soon as possible after April 15, and to continuing to work closely with the Board for the benefit of Nunavut wildlife and Inuit.

Sincerely,



James Eetoolook

Vice-President

CC. Hon. Johnny Mike, GN

Hon. Catherine McKenna, GC

Simon Qingnaqtuq, KRWB

Larry Adjun, Kugluktuk HTO

Sam Kapolak, Bathurst Inlet HTO

Peter Kapolak, Bay Chimo HTO