



May 12, 2016

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

Dear Chairperson:

**Re: Public Hearings of the Nunavut Wildlife Management Board (Board) to consider regional total allowable harvests (TAHs) for the Bluenose East and Bathurst caribou herds, currently scheduled for June 14-17, 2016**

Further to the Board's April 1 2016 notice, Nunavut Tunngavik Incorporated's (NTI's) April 8 letter to the Board and the Board's April 18 reply, thank you for the opportunity to make NTI's additional views known to the Board regarding this proceeding.

*Total Allowable Harvests*

The Kitikmeot Inuit Association (KIA) has requested that the Board postpone these public hearings until September, 2016 (Submission to the Nunavut Wildlife Management Board for decision on the issue of KIA's request for adjournment, KIA, May 9, 2016). NTI supports KIA's request. In NTI's submission:

- KIA's submission demonstrates that the GN has not consulted affected Inuit adequately to date on the issue whether HTO measures can achieve the conservation purpose that the Board will have for these caribou populations without establishment of TAHs. The Board may establish a TAH for any wildlife population "only" if a TAH would limit Inuit harvesting "to the extent necessary ... to effect a valid conservation purpose"(s. 5.3.3, *Nunavut Agreement*).
- The NWMB's public hearing schedule, which was extremely tight when announced on April 1, needs to accommodate the exceptional load that recent NIRB hearings have placed upon Kitikmeot Inuit and their representatives. Those hearings were very important to the management of these caribou populations. Hence the time and work that Kitikmeot Inuit devoted to NIRB's hearings are highly relevant to the Board's scheduling decision.

Should the Board decline to grant this joint request, NTI asks that the Board provide the Board's full written reasons for doing so. NTI reserves the right to make detailed oral submissions

through NTI's representatives on the issue of a level of any TAH at the public hearing, whenever the hearing is held.

*Basic Needs Levels*

The Board has confirmed that, if it establishes TAHs, the Board plans to postpone striking the Basic Needs Levels (BNLs) in the case of these two herds. The BNL represents the minimum share of a TAH that the *Nunavut Agreement* reserves to Inuit. The Board stated in its April 18 letter that, until a BNL is struck, the Board's "legitimate expectation" is that the full amount of any TAH will be allocated to Inuit.

In response, NTI will not insist on an early striking of the BNL in this proceeding provided that any Board TAH decision clearly reserves the entire TAH to Inuit pending striking of the BNL.

Thank you for taking NTI's views into consideration.

Yours truly,

A handwritten signature in black ink, appearing to be 'James Eetoolook', written over a horizontal line.

James Eetoolook  
Vice-President

CC. Hon. Johnny Mike, GN  
Hon. Catherine McKenna, GC  
Simon Qingnaqtuq, KRWB  
Larry Adjun, Kugluktuk HTO  
Connie Kapolak, Bathurst Inlet HTO  
Peter Kapolak, Bay Chimo HTO  
Bobby Greenley, Cambridge Bay HTO  
Paul Emingak, KIA