

RICHARD SPAULDING

BARRISTER AND SOLICITOR

September 4, 2015

Jason Akearok,
Executive Director
Nunavut Wildlife Management Board
P.O. Box 1379,
Iqaluit, NU
X0A 0H0

Dear Mr Akearok:

Re: Southampton Island Caribou BNL Determination

On behalf of my client Nunavut Tunngavik Incorporated (NTI), I can advise that NTI does not object to the Board accepting for late filing the documents referred to in the Government of Nunavut's (GN) August 28 2015 letter.

In response to the description of these documents in the GN's letter, NTI wishes to point out that the seven contracts in question are not identical, but consist of five contracts for hunters and two for haulers, and that the contracts are expressly for services (rather than employment). NTI will reserve comment on the significance of these documents for NTI's written submission.

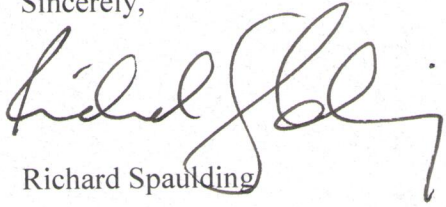
NTI proposes that every effort be made in this proceeding not to disclose publicly any personal financial information without the prior knowledge and consent of the individuals affected. The GN proposes to identify names in the 1996 contracts to be filed, for the purpose of establishing that some of the same individuals are referred to in document "35", a 2007 payroll record, in connection with identified amounts of remuneration, contributions, and deductions. Rather than file these names with the Board, NTI proposes that GN counsel provide the names to NTI counsel for this purpose in advance of filing, and file the documents with names redacted but the individuals referred to using pseudonyms (such as Hunter #1).

NTI agrees with the GN that the filing of these documents can assist in simplifying this proceeding and reducing potential hearing time. With this goal in mind, NTI also requests that the Board direct the GN either to admit, before September 30, 2015, that all the hunters of Southampton Island caribou described in the GN's documents filed in this proceeding are "Inuit" within the meaning of the *Nunavut Agreement*, or provide the Board by that date persuasive reasons why the Board should not presume this to be the fact for all purposes in this proceeding. The GN has declined on the record to make this straightforward admission in previous exchanges with NTI. In NTI's submission further exchanges should not be necessary.

Of the Nunavut Bar

If the Board has any questions regarding these views, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Spaulding". The signature is fluid and cursive, with a large loop at the end of the last name.

Richard Spaulding