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**Société Makivik**  
**Makivik Corporation**

Kuuujuaq, May 11th, 2016

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

**Re: Written Public Hearing to Consider the Integrated Fisheries Management Plan for Atlantic Walrus in the Nunavut Settlement Area.**

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Dear Mr. Shewchuck,

On behalf of Makivik Corporation, I would like to thank you for providing us with an opportunity to submit our views concerning the Nunavut Wildlife Management Board's upcoming decision on the Integrated Fisheries Management Plan (IFMP) for walrus in the Nunavut Settlement Area (NSA).

This submission is being presented on behalf of all Nunavik Inuit, pursuant to Makivik's role as a birthright organization, responsible for preserving the rights and traditions of Nunavik Inuit. As well, in accordance with s. 27.3.4 of the Nunavik Inuit Land Claims Agreement (NILCA) and s. 40.2.6 of the Nunavut Land Claims Agreement (NLCA), Makivik exercises the power of an HTO or RWO on behalf of Nunavik Inuit within Areas of Equal Use and Occupancy. Finally, Makivik's role on this matter includes the appointment of two alternate members to the NWMB, who shall replace an equal number of members appointed by the DIO for decisions that apply to activities that take place in the Areas of Equal Use and Occupancy (NILCA s.27.6.1 & NLCA s.40.2.14).

Let it be understood from the outset that Makivik fully recognizes that the proposed IFMP is applicable only within the NSA and has no immediate bearing on walrus harvesting activities within the Nunavik Marine Region (NMR). We fully understand how the management plan arose, and commend the consultation process utilized to gather the views of High Arctic and Foxe Basin communities. However, we question the foundations of an IFMP (which is fundamentally intended to ensure that a fishery is managed using an ecosystem approach) that is delimited based on jurisdictional boundaries rather than on environmental and biological parameters. Makivik is further compelled to provide input in this process since the Hudson Bay-Davis Strait (AW-05) and the South and East Hudson Bay (AW-06) walrus stocks both occur in the NMR, and because the Areas of Equal Use and Occupancy at Nottingham and Salisbury Islands and in Hudson Bay are important walrus hunting sites for Nunavik Inuit.

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Although a thorough consultation process was employed in the High Arctic and Foxe Basin communities, significantly less effort was devoted to areas where a TAH will not be put in place immediately. Concerns about this were raised in earlier correspondence by the Qikiqtaaluk Wildlife Board (QWB). Similar concerns exist in Nunavik, where little to no consultations have taken place at the community level. The IFMP implies that a TAH will be recommended for the Hudson Bay-Davis Strait and South and East Hudson Bay stocks once sufficient information has been published to allow calculation of a Total Allowable Landed Catch (TALC); this message has not been conveyed to Nunavik Inuit. While this could have implications for the future of walrus management in the NMR, it is particularly problematic because the decision, as it is currently presented, will apply to the Areas of Equal Use and Occupancy and therefore to some of the most important walrus hunting areas for Nunavik Inuit without any dedicated consultations to this effect having occurred.

On the first point, Makivik strongly believes that the Department of Fisheries and Oceans must agree to undertake consultations with all Nunavik communities to explain their future intentions regarding walrus management in the NMR, similar to the commitment they have taken to address the concerns expressed by the QWB. This is particularly true if DFO remains committed to implementing an IFMP for the NMR that is largely based on the Nunavut model since some aspects (e.g. post-harvest tag system) may not be acceptable to Nunavik Inuit. DFO has made no such commitments and we therefore have no assurances that they will approach the development of an IFMP for the NMR with a complete willingness to integrate the views and preoccupations of Nunavik Inuit if a similar system is already in place for shared stocks that also occur in the NSA. Consequently, we recommend that the NWMB decision request exclusion AW-05 and AW-06 from the IFMP until meaningful consultations have been duly conducted in Nunavik.

Similarly, DFO has requested that the NWMB approve the establishment of boundaries for six Management Units based on walrus stock delineations and local traditional knowledge within the NSA. In the case of AW-05 and AW-06, the proposed boundaries extend into the NMR; Makivik, therefore, does not consider it appropriate for the NWMB to unilaterally establish these boundaries. Participation of the NMRWB on this matter is necessary, but not without prior consultation of Nunavik Inuit, who equally hold significant knowledge about these stocks.

Finally, Makivik's primary concern with regards to the lack of diligent consultations relates to possible changes in the management regime for the areas of equal use and occupancy. If the NWMB decides to approve the IFMP as it has been presented, despite the objections noted above and subject to the decision-making process applicable to Areas of Equal Use and Occupancy, it will (regardless of whether new harvesting limits are put in place), in effect, be modifying the existing management framework applicable to Nunavik Inuit in those areas. Since Nunavik Inuit have not been participatory to the development of the IFMP or its objectives, Makivik requests that these areas (Nottingham and Salisbury Islands, as well as the Area of Equal Use and Occupancy in Hudson Bay) be excluded from the IFMP until Nunavik Inuit have been formally consulted.

Daniel Shewchuk

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Once again, Makivik would like to thank the NWMB for this opportunity to provide input to your decision-making process and I trust that the NWMB will give full consideration to the points raised herein. Should you require any further clarification regarding this submission, I invite you to contact Mr. Stas Olpinski (Director of Makivik's Resource Development Department).

Yours truly,



**Adamie Delisle Alaku**

Executive Vice-President

Resource Development Department

Cc: Josepi Padlayat, Chairman, Nunavik Marine Region Wildlife Board  
Kaitlin Breton-Honeyman, Interim-Executive Director, Nunavik Marine Region Wildlife Board  
Paulusi Novalinga, President, Regional Nunavimmi Umajulirijiit Katujiqatigiinninga  
Kevin Wilkins, Aboriginal Programs Manager, Fisheries and Oceans Canada  
Anne-Marie Cabana, Coordinator, Aboriginal Affairs, Fisheries and Oceans Canada  
Jamesie Qillaq, Chairman, Qikiqtaaluk Wildlife Board  
Jamesie Eetoolook, Vice-President, Nunavut Tunngavik Incorporated



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