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Ben Kovic, Chair Nunavut Wildlife Management Board P.O Box 1379 Iqaluit, NU XOA 0H0 December 17, 2014

Qikiqtaaluk Wildlife Board Submission to the Nunavut Wildlife Management Board for the Public Hearing to Establish a Management Unit and Total Allowable Harvest for Foxe Basin Walrus

In response to the above mention submission, QWB will not address the request to establish a Foxe Basin Management Unit. Instead, QWB will question the department's request to set a TAH of 116. QWB is recommending to the Nunavut Wildlife Management Board that it postpones the setting of a TAH for the proposed Foxe Basin Management Zone. QWB believes a more effective approach for walrus management for the Foxe Basin, and Nunavut, is to focus on a formalizing a walrus management plan. QWB and the involved HTOs are in support of a Walrus Management Plan and have been active participants in the work of the department. Focusing on the IFMP will lay the ground work to a more equitable and interactive relationship between HTOs and its co management partners as it will level the playing field on knowledge about the technicalities of the management plan. This will be needed in order to support a more realistic TAH into the future.

QWB brings forward numerous reasons in making this recommendation:

Inuit and community knowledge.

1) Walrus Culture

For the communities of Hall Beach and Igloolik, the importance of walrus cannot be underestimated. The history, experience and lessons of walrus hunting has shaped the identity and structures of these communities. The food from walrus, particularly Igunaq, is a local delicacy that is sought after by communities right across Qikiqtaaluk and Nunavut. It is a food that is shared amongst kin and community and it has proven to be an emerging economic source. The harvesting of walrus is an important site of Inuit Qaujimajatuqangit and the passing of this knowledge between generations is a site of individual and collective pride. Walrus culture and its harvesting is central to the well being of these communities.

These facts have <u>NOT</u> been accurately included in the department's consideration. In response to this, QWB urges NWMB, in its decision making process, to consider section 5.6.9 of the Nunavut Land Claims Agreement (NLCA) when deliberating:



In assessing the economic, social and cultural needs of Inuit, the NWMB shall consider:

- a) actual levels of harvest
- b) availability of and accessibility to wildlife; and
- c) the general economic, social and cultural conditions and circumstances of Inuit.

2) The impacts of quota culture

Community members have raised concerns that setting a quota, particularly a conservative one in absence of an expressed conservation concern, will change how people hunt walrus. Community members have stated that setting an unnecessary low quota will create a 'rushed' harvest effect. This means that when a high demand for a food source is met with a low quota, community members will rush to hunt causing an environment where care, caution and calculation is secondary to the actual hunt. Community members have used polar bear hunting as an example of the impacts a low quota will have, especially as the low quota is not rooted in a genuine conservation concern by the community. In fact, it would appear that the department is not confident in its conservation concern – having used the word "might" to describe the possible conservation concern. QWB urges NWMB to consider other management responses to assess the possible conservation concern in lieu of an excessive response that will do more harm than good.

Evolving role of Working Group

QWB, as well as the HTO's of Igloolik and Hall Beach, are members of the Walrus Working Group. As organizations involved in the group since inception, it has been noted that this groups focus has changed. Discussions on a walrus management plan were inspired by concerns of a possible increase in shipping due to future mining development. It was with this focus that the group engaged with the department and shared much community and Inuit knowledge. As the department is aware, QWB and the HTOs have been receptive to establishing a management plan. But, QWB is concern that in this rush to establish a low TAH based on a partial survey of the population that is not supported by the impacted communities will strain the collaborative relationship that has taken time to develop. This will make it more difficult to establishment a management plan into the future. In understanding this concern, QWB recommends to the department that it instead focuses on working with the impacted communities to develop a more realistic TAH.

IFMP

DFO has initiated a series of IFMP processes for species it is ultimately responsible for. DFO has benefited greatly in having HTO and RWO involvement in this work.



This work has required a lot of time and energy from its members. These IFMP's are designed and written in English, and translation is relied on heavily in conversations about these plans. It is fair to assume that over time, messages have gotten lost in translation. In order to maximize engagement through the translation process, multiple conversations over time are required. This commitment has been supported in discussions on the IFMP, and yet, the IFMP has not been formally approved. This commitment of time and engagement has not been met in discussions on the TAH.

QWB has raised this concern formally. After the initial consultation the department and working group held with Igloolik and Hall Beach in May 2014, QWB sent a letter to NWMB dated May 16, 2014. In this letter, QWB stated that discussing the IFMP for Walrus is a different process than setting a TAH, and that each process requires its own consultation time. This did not occur, and therefore, we do not consider the consultation process as complete. This letter is attached to this proposal.

Questions on the need of a TAH

While the communities of Hall Beach and Igloolik have stated there are opportunities for developing traditional knowledge for new walrus hunters, QWB supports Hall Beach and Igloolik in stating that current harvest levels are do not pose a threat to the population. Drawing from the definition of conservation as outlined in section 5.1.5 and 5.3.3 of the NLCA, QWB does not believe there is a conservation concern for Walrus, and therefore, and TAH does not need to be set:

Section 5.1.5: The Principle of Conservation are:

- a) the maintenance of the natural balance of ecological systems within the Nunavut Settlement Area;
- b) the protection of wildlife habitat;
- c) the maintenance of vital, healthy, wildlife populations capable of sustaining harvesting needs as defined in this Article; and
- d) the restoration and revitalization of depleted populations of wildlife and wildlife habitat.
- 5.3.3: Decisions of the NWMB or a Minister made in relation to Part 6 shall restrict or limit Inuit harvesting only to the extent necessary:





- a) to effect a valid conservation purpose;
- b) to give effect to the allocation system outlined in this Article, to other provisions of this Article and to Article 40; or
- c) to provide for public health or public safety.

It is QWB's opinion that when placed against these criteria, there is no conservation issues for Walrus within this region, and therefore, the request to set a conservative TAH is frivolous.

Concern about the science

DFO is basing their recommendations on population estimates derived from partial survey of the Foxe Basin region. QWB is of the opinion that the estimate number are incorrect and that the survey of the population is incomplete. Concerns raised by community members involved in the survey state the survey was limited by weather and did not include key walrus areas within the survey. We do not believe DFO's findings represent the best available data. QWB recommends that while the department focuses on renewing the IFMP conversation, the department also organize a new survey focusing on the entire population range. Impacted communities must be involved in the development of a new survey plan.

In closing, QWB recommends:

- 1) NWMB postpone the setting of a TAH
- 2) DFO and the Walrus Working Group revisit the IFMP with a renewed focus on community engagement and education
- 3) DFO organize a survey of the entire Foxe Basin Region and ensure community involved in the survey design.

Thank you,

James Qillaq, Chair,

Qikiqtaaluk Wildlife Board