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Qikiqtaaluk Wildlife Board

March 5, 2015

Ben Kovic, Chair
Nunavut Wildlife Management Board
P.O Box 1379
Iqaluit, NU X0A 0H0

Sent by email to: receptionist@nwmb.com

Re: NWMB Public Hearing for Foxe Basin Walrus

Mr. Kovic,

In a letter dated February 6, 2014, you invited co-management partners to "provide additional written submissions and supporting documentation concerning only the adequacy of the consultations conducted by Fisheries and Oceans Canada on the establishment of a management unit and total allowable harvest for Foxe Basin walrus". QWB is responding to this invitation.

The discussions on the establishment of a Foxe Basin management unit for Walrus, and the subsequent TAH recommendation, stem from the work on the Walrus Integrated Fisheries Management Plan (IFMP). The Walrus Working Group has been the key structural support for this plan, made up of representatives of the impacted co management partners. For the proposed Foxe Basin management unit, QWB has been a participant on this working group along with representatives of Igloolik and Hall Beach's HTO.

QWB appreciates DFO's leadership and support in developing the Walrus IFMP. They have provide consistent support for this group and plan. QWB sees the merit and importance of this work, and therefore, we support the IFMP process. I wish to state this explicitly. I do not want the questions we raise about the appropriateness of the TAH consultation process to be interpreted as a failure of the IFMP process to date. This is not the case. We are raising questions about the appropriateness of the consultation in order to maintain the collaborative approach of the IFMP. We believe that having all co management partners support this plan is necessary prior to the important work of going to the communities to inform and educate them on the IFMP and explaining its role within the community. Doing work this way affirms the importance of informing and educating the community, which creates opportunities for community members to respond and engage with this plan. With this in mind, we do not believe adequate consultation was completed in the establishment of a TAH for Foxe Basin Walrus.

To explain our argument, I would like to raise the following points:

1) The proposed TAH was raised directly with the impacted communities once.

The Walrus working group met with the communities of Igloolik and Hall Beach on May 29 & 30th, 2014. In building on the success of similar consultation tours, two meetings were held at the community: 1 with the HTO and 1 public meeting. Representatives of each of the co management partners were present at these meetings. It was at this meeting the two communities first hear of the proposed TAH of 116.

While both meetings were deemed well attended and successful, the fact remains that one meeting with each of the impacted communities was held where the TAH was discussed.

2) The consultation agenda was ambitious, there was not adequate time in the community to meet the various goals.

In addition to the single consultation tour, the consultation agenda for this consultation was ambitious. As expressed by DFO in its draft consultation summary, the goal of these consultations was "to determine support for the draft management plan in general terms, to obtain specific local knowledge to hold in the refining of the draft management plan to include HTO and community input and concerns. These specifics include potential management unit boundaries, sustainable harvest levels for the establishment of a TAH, harvest reporting and monitoring procedures, and the use of walrus harvest tags."

QWB appreciates that a single discussion with a group of community representatives can result in a wide variety of rich knowledge and experience being shared. While this is the case, this consultation agenda centered on the IFMP, a dynamic plan which includes multiple players at different political levels. The presentation on the IFMP alone had 42 slides. DFO was prepared with a significant amount of background information to provide context. And yet, QWB anticipated that in introducing a conservative TAH would become the focus of the discussion.

In anticipation to this, I wrote a letter to NWMB to state these concerns. In a letter dated May 16, 2014, I questioned the effectiveness of DFO's strategy to discuss both the IFMP and the proposed TAH in a single consultation tour. In considering the cultural, social and economic importance of Walrus for the communities of Hall Beach and Igloolik, we anticipated that a debate on TAH would deflect attention away from the IFMP. We anticipated this concern because of the work QWB does: we are involved in constant discussions with HTOs about multiple management plans. Experience, and our commitment to HTOs engagement, directs us to constantly work to ensure the intent and use of these plans are expressed in a way that connects to the HTO board's diverse experience. QWB anticipated that a TAH debate would limit other importance conversations about the plan, including important discussions about research and community engagement, topics that require continuous improvement and engagement.

Again, in reviewing the DFO Consultation report, it would seem QWB's concerns were validated. In its Consultation Summary it goes on to read "In general terms, there appears to be support for a management plan for walrus, but there was no support for establishing a TAH based on Total Allowable Landed Catch (TALC) recommendations from recent DFO science advice. "

3) Differing views of the role of the Working Group.

As a member of various working groups, I appreciated the benefits of a working group forum. The Walrus working group is a helpful environment where community, regional and territorial representatives can learn about DFO's work. Equally important, this group provides invaluable learning site to DFO representatives, who benefit greatly from the extensive experience of the individual representative and their interpretation of the broader community experience.

While this is the case, QWB does not consider the work of this group as community consultation. The forum of the working group is meant to be a group setting whose strength is for context, and to provide direction on key structural issues for the plan, and inform the plan's tone. This group would do this before it is brought to the community and community members are invited their own feedback Therefore, Working Group forums must not be represented as community consultation.

4) Understanding of the working group reps.

As an organization that represents the Qikiqtaaluk's HTO boards, we work with the patterns of HTO boards. We understand that HTO boards are in constant movement; new members come and go. Also, for meetings, it is not always guaranteed that the same representative can attend all meetings. While there is a responsibility for representatives to inform their fellow board members on the discussion, we also understand that members who are newly engaging in the process may not transfer the full scope of these discussions. In response to this, QWB has learnt that consistent messaging of the key points must be explicitly made. While a debate on TAH may have been implied in the IFMP talks, the likelihood that this did not translate is a reality, as many of the Working Group representatives we asked about this process stated they were not aware of the proposed TAH prior to the consultation plan.

5) Was their adequate consultation on the TAH?

In reviewing these facts and experience, QWB is on the opinion that the consultation around the TAH for the proposed Foxe Basin Management Unity, was not adequate.

This experience provides further troubling trend surrounding walrus and community engagement. In early 2014, NWMB held a conference call with the HTOs of Hall Beach and Igloolik to discuss the applications for the upcoming walrus sport hunts in these communities. DFO expressed concerns of "potential conservation concerns", as they just published the results of their most recent population survey. DFO went straight to NWMB with their concerns and suggested harvesting limits BEFORE they consulted the communities about this study and about their concerns which resulted in NWMB holding a conference call with the communities.

I would like to close this submission by restating QWB's stance on the question of a TAH. A debate on TAH should not occur until the IFMP has been finalized. Once that work has been completed, and supported by the community, then a meaningful and appropriate discussion to determine an adequate and reflective TAH can occur. To ensure this debate is properly informed, DFO must organize a survey of the complete area, and have full community engagement in the design and implementation of the survey.

Thank you,

James Qillaq, Chair
Qikiqtaaluk Wildlife Board.