

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

January 22, 2016

RE: Written submission from the Government of Nunavut Department of Environment (DoE) regarding the merits of the Proposal for Decision (Proposal) from Fisheries and Oceans Canada (DFO) to approve the Qammarttalik Cove Emerging Char Fishery Plan (Fishing Plan).

Dear Mr. Akearok,

This letter is in response to the Nunavut Wildlife Management Board's (NWMB or Board) request for a written submission from the Government of Nunavut Department of Environment regarding the merits of the Proposal for Decision (Proposal) from Fisheries and Oceans Canada (DFO) to approve the Qammarttalik Cove Emerging Char Fishery Plan (Fishing Plan).

As you know, the mandate of the Government of Nunavut's Department of Environment (DoE) is to promote and support the establishment of sustainable commercial fisheries in Nunavut. Small-scale, community-based fisheries provide tangible economic benefits to communities, particularly small, non-decentralized communities facing higher unemployment rates such as Qikiqtarjuaq. Currently, Qikiqtarjuaq has approximately four active commercial Arctic char (char) fisheries and one current exploratory char fishery in its second year of the five year exploratory protocol. Many Qikiqtarjuaq residents have come to rely on seasonal income gained from the small-scale commercial char fishery, and it is apparent that DFO has continued to work with the community regarding current and future char fishery development efforts in the community.

The DoE recognizes that NTI's challenge to the Board's authority under the Nunavut Land Claims Agreement (*NLCA*) to make a decision regarding the Proposal was born out of a long-standing frustration regarding the lack of progress in discussions with DFO regarding the development of modern Nunavut Fisheries Regulations (Regulations) and the types of harvests

 $^{^{1}}$ Personal communications with Chris Lewis, Fisheries Management Biologist, DFO Fisheries Resource Management, Iqaluit



to be included in the calculation of a Basic Needs Level (BNL). Although the DoE shares this frustration, we feel that further such challenges by stakeholders will only act as a hindrance to fisheries development in smaller communities such as Qikiqtarjuaq, where small-scale community-based fisheries can provide much-needed income opportunities. To continue to delay such processes will adversely affect the income potential of the local fish harvesters.

In consideration of the abovementioned factors and careful review of the Proposal, the DoE finds no plausible reason to challenge the merits of the Proposal based on the following reasons:

- 1. This request for an exploratory fishing license originated directly from the Nattivak Hunters and Trappers Organization (HTO);
- DFO and the Nattivak HTO entered into a collaborative arrangement and presented a mutually agreed upon management and protection plan for the char stock in question for the NWMB's consideration;
- The identification of the waterbodies and 1000kg harvest level were suggested by the HTO based on traditional and local knowledge and agreed upon by DFO;
- 4. The 1000kg harvest level is consistent with previous exploratory harvest levels recommended by DFO for other areas;
- DFO's five-year exploratory protocol was developed specific to anadromous char populations in Nunavut and the Northwest Territories and was re-reviewed in 2010, making it a relevant and applicable to this char stock²;
- 6. As per the Proposal, DFO identified a moderate risk to the char stock in question with the proposed fishing plan;
- 7. DFO appeared to follow its normal regulatory process for consideration of an exploratory fisheries application; and
- 8. It is the DoE's position to support the development of sustainable, community-based fisheries in Nunavut; requiring the use of traditional and local knowledge and the application of sound science. In the case of this proposal, we feel that both of these requirements have been adequately met.

We are hopeful that community-based, exploratory fisheries development efforts in Qikiqtarjuaq will be able to continue without further delay and the DoE will continue to support all Nunavut

² VanGerwen-Toyne, M and Tallman, R. 2011. Information in support of an Exploratory Fishery Protocol - Nunavut and Northwest Territories Anadromous Arctic Charr. DFO Can. Sci. Advis. Sec. Res. Doc. 2010/077. vi + 32 p.



communities in their fisheries development efforts in support of building strong, prosperous communities.

Sincerely,

Steve Pinksen

Assistant Deputy Minister