The below is directly from the GN submission to the NWMB. For each statement I have outlined discrepancies and then put forth what we feel is a recommendation that will help the caribou more than the GN proposal.

## Issue: Recommendation to address the decline of the Bathurst caribou herd. Background:

• In the mid-1980's close to half a million Bathurst caribou were present on their annual range. From 2006 to 2009 the herd declined to about 32,000 caribou. and the herd was estimated at 35,000 caribou in 2012 suggesting the herd had been relatively stable from 2009 to 2012 (Figure 1).

The gross and misleading information above is that since 1980 the annual range of the Bathurst Caribou Herd has been reduced to 1/3<sup>rd</sup> of its former range. In the 1980's the Bluenose East and Ahiak herd did not exist. TODAY if you add the total number of caribou on the 1980 range map there would be still over 200,000 Caribou using the same area they are just called by different names now. It used to be all Bathurst. Now it is Bathurst / Bluenose East and Ahiak (and even Beverly). I am willing to bet that every Elder in this room can remember a time that all caribou on the mainland from Great Bear Lake to Chantry Inlet and south to Great Slave Lake were considered Bathurst Caribou.

Biologist have always called caribou after the area they calved. The new Nunavut Wildlife Act recognizes this and has included a legal definition of the Bathurst Caribou herd calving grounds. This when plotted is on the EAST side of Bathurst Inlet. Currently none of the caribou calving on the east of Bathurst Inlet are considered Bathurst Caribou by the GNWT. THIS IS WRONG AND MUST BE CHANGED BEFORE A TAH CAN BE CONSIDERED as it is clear that not all caribou in the herd are being accounted for.

When Nunavut was formed as a territory the Bathurst herd consisted of all animals calving on both sides of Bathurst Inlet and even (as above) had it written into the Wildlife Act. The animals on east side of Bathurst Inlet have not been included in the annual counts and this is misleading.

Who gets to change the definition of a herds range? Was Nunavut organizations consulted and agreed to the new definition of the Bathurst Herd range and calving area? To my knowledge they were not.

If Biologist want to group caribou by areas they calve that is fine but they should not be able to redefine herd ranges without consultation and agreement at all levels of government. To the best of my knowledge no HTO's or governing bodies were involved in any consultations to create new the herds or to redefine range areas.

It is a interesting thing to note that caribou tags issued for commercial harvest are for Barrenground Caribou, they do not specify a specific herd on this area because at one time all the caribou were Bathurst Caribou.

• In December 2010 new management regulations were adopted by the Northwest Territories to address conservation concerns. This included the closure of outfitting and commercial harvest as well as a limitation of the aboriginal harvest to a maximum of 300 caribou.

Yes the GNWT did these steps, but they did not due what was really needed if the caribou were in the trouble they said they were. That is to drastically increase the harvest of wolves and bears. Instead they took out a industry that was actually helping the caribou, the Outfitting industry (more on this point later).

The GNWT never did limit the harvest to bulls only (this was being practiced in Nunavut during all this time). Not by regulation but by the fact that under their new definition of the Bathurst herd the only ones harvesting from it were harvesting bulls.

Since 2010 the GNWT still allowed the harvest of pregnant females which hurts the herd much more than harvesting bulls. So in reality while the GNWT since 2010 did very little, in Nunavut they was a harvest of bulls only and only 70 or so a year.

Now it is common fact that the GNWT has put a lot of pressure on the GN for not doing anything to help the Bathurst caribou since 2010. The facts are Nunavut was doing more and hurting the caribou less than the GNWT was.

• In Nunavut, the Bathurst Caribou herd is harvested by Kugluktuk, Bathurst Inlet and Bay Chimo (with an estimated overall harvest of 100 per year, of which 70 are for sport hunts). When the herd was at historic highs and closer to Kugluktuk, that community also harvested from the herd.

If you go by the new annual range maps for the Bathurst herd it means that no Inuk hunting from Cambridge bay (spring or fall), Kugluktuk, Bathurst or Umingmaktok harvest Bathurst Caribou anymore. The only harvesters in Nunavut of this herd are a few Inuit who spend time in the fall at Contwoyto Lake and the Bathurst and Umingmaktok HTO's who use their tags in the fall harvesting bulls only.

• In June 2014, a reconnaissance survey was flown near the peak of calving. The total estimated number of caribou at least one year old was  $3,594 \pm 2,133$  compared to  $14,390 \pm 6,109$  in June 2012. This survey suggests that Bathurst caribou on the calving ground (one year older) have further declined between 2013 and 2014.

Once again all the traditional calving grounds including those east of Bathurst Inlet are not being flown and those animals calving there were not included in the Bathurst herd size. Until this happens a TAH cannot legally be requested and indeed if those animals were included then there would be no need for a TAH request. The maps presented by GNWT of the survey clearly show no animals on the east side of Bathurst Inlet were counted.

• In the past, the calving ground reconnaissance surveys have been a reliable index of abundance in tracking population trend when compared to full population assessments and trend based on aerial photo-surveys.

Yes that is true but to be accurate ALL the caribou in the traditional Bathurst calving grounds need to be counted.

Did you know outfitting helps Caribou:

It is true that we harvest 70 or so bull caribou annually in partnership with Bathurst and Umingmaktok HTO's. This provides employment and meat for Inuit from both those communities as well as from Kugluktuk. All guides and cooks etc in the camp are Inuit.

When the outfitting in the NWT was closed it meant a reduction in the wolf harvest and indirectly the GNWT likely caused the death of MORE caribou then they saved. The outfitter clients harvested wolves if the NWT outfitters took a combined harvest of approximately 15 -25 wolves / yr X 6 years X 25 caribou /wolf/yr = 2250 - 3750 caribou lost and these were not bulls only but likely mostly breeding females.

The sports hunt also allows hundreds of pounds of meat to be taken by the guides and also donated to needy families in Nunavut and in Yellowknife.

Typically our clients hunting in Nunavut harvest 6 - 10 or so wolves / yr. This is in the fall when the wolves cannot increase pack size for almost another year so when we take a wolf we are saving 25 or so caribou a year for each wolf taken. Not only that, wolves harvest any caribou not just bulls and the impact of taking 25 caribou / wolf is vastly more detrimental than taking bulls only.

This means in our outfitting business we take 70 caribou but directly save 150 - 280 caribou/yr, so in fact we actually help the herd increase by 80 - 180 animals per year. Since 2010 we have saved upwards of 1000 caribou.

Why would anyone consider shutting down a industry that actually is helping the caribou?

On reading the notes from all the community meeting / consultations it was a common theme to harvest more wolves.

## We are the ONLY commercial industry out there that can be proven to be a benefit to a caribou herd. This is especially important if a herd is perceived to be in decline.

Recommendation:

It is our opinion that legally the NWMB cannot consider implementing a TAH on a species until it has all the best available population information. In this case thousands of caribou calving on the east side of Bathurst Inlet are not being counted in the annual estimates as recognized by the Nunavut Wildlife Act.

The below is cut and pasted from the consultations this winter on the Bathurst caribou herd. They are on the NWMB public record.

"Bruno resume with 2nd presentation on the Bathurst herd.

Questions from presentation:

Kugluktuk HTO Is there herd switching?

**Bruno-** there is not, the collars show that they are not switching and not necessarily dying.

If there is no herd switching why then is the east side of Bathurst no longer considered Bathurst Caribou? This has always been Bathurst Caribou, if caribou do not switch then they are Bathurst Caribou.

In another statement the GNWT said:

"**Bruno** - The survey lines are the same every year since 1996, we were seeing lots of caribou, now we are seeing far less with the same process. They have always come back to the calving area, there is no evidence of them moving the calving area. It is very hard to count dead caribou, mostly it is about poor recruitment"

This again confirms that caribou do NOT switch calving grounds and all those caribou east of Bathurst Inlet are Bathurst Caribou and need to be added to the herd size. Traditional and scientific knowledge agree that the Bathurst herd always has calved on both sides of Bathurst Inlet (see maps provided). If the caribou that now calf only on the west side of the inlet are the only ones called Bathurst caribou then it is my prediction that very soon this herd will be totally gone, as one day soon (like in the past) the caribou will not calf there, then according to the new definition of the ranges the Bathurst herd will be gone forever.

If we were to look at the facts regarding herd calving grounds we are being told that the Bathurst herd once calved on both sides of Bathurst Inlet but now it only calves on the west side. A new herd (Ahiak) took over the East side calving grounds from the Bathurst for a number of years but now the most recent theory is that the Ahiak have abandoned the old Bathurst caribou calving grounds and the Beverly Caribou now occupy them!!!!!!!! I am sorry but you cannot say herds do not switch calving grounds and then can claim that the above happened.

This entire herd switching theory started when collars were put on caribou. If like in the old days when a survey was flown the caribou calving on the west and the east side of Bathurst were counted they would have all been Bathurst Caribou and we would not be sitting here discussing the fact that the Bathurst herd is now only 20,000 - 30,000 animals.

We do understand caribou populations fluctuate and migrations change and yes there are likely less caribou on the mainland now than in the 80's. From Alaska to Quebec this has been happening and it will continue to happen. Population cycles are natural. Population fluctuations can be a combination of many factors. As pointed out in all the consultation meetings by the elders there used to be a lot more lnuit on the land and those lnuit were hunting wolves as well as caribou. Thus helping the herds like the outfitting is doing now.

Now there are few families living on the land.

Not too long ago there were 25 people living year round at the Bathurst community, 60 at Umingmaktok. There were also families at Pellatt and Contwoyto Lake all year. If you add this all up they were many great hunters taking a lot of wolves. I know some of them would take 20 or 30 wolves EACH in a winter. This was also at a time when dog teams were not used much anymore and the Snowmobile did not eat caribou but it sure helped the hunters get the wolves.

If the caribou numbers are down in this area then the best way (as pointed out in the consultation meetings) is to start harvesting more wolves and grizzlies. This can be done by simply guaranteeing a fair value of at least \$1000/wolf to hunters in Nunavut. I believe you will then see a large number of wolves harvested. Taking of 40 wolves would save upwards of 1000 caribou and be the most cost effective way to manage it. Increasing grizzly quotas will also help.

People in the NWT often ask why is there no more caribou at Gordon lake (and elsewhere). Well if you look at a map of forest fires for the past 10 years you will see that most forest in the North Slave has been burnt. Caribou need lichen and moss to live. These take 30 - 40 years to grow. If there is no food the caribou move on. It is not a mystery just a fact. Even if numbers increase greatly it is reality that it will be 30 years or more (without any more fires) before caribou are again wintering in numbers in the North Slave.

In addition to fires the winters are warmer and more caribou seem to be spending the winters on the tundra and wintering east of Bathurst Inlet instead of the "typical migrations" we are accustomed to in the past. Perhaps there are other factors as well.

It is a fact that Outfitting, while providing meat and economic benefit to Inuit actually help the caribou herds more than we hurt them. Outfitting should be allowed to continue. Of course local use of the caribou by Inuit should always outweigh commercial use but in this case if you go by the new herd's annual range there are no Inuit from the communities harvesting from this group of caribou.

The harvest of 100 bull caribou out of a herd of even 10,000 would not affect the growth recovery potential of a herd. Especially when you add in the benefit of saving 150 - 250 Caribou / yr.

Conclusion:

The NWMB is considering two things. 1) is a TAH needed and 2) if so what should that harvest number be.

We believe the above will prove that a TAH is not needed nor would it be morally or legally correct as there are many more Bathurst Caribou out there then we are being told.

Even if the new range is accepted by Nunavut the current harvest in Nunavut of 100 or so bulls is not hurting the herd at all. In Alaska studies show sustainable harvest of hundreds of caribou on herds much smaller than the purported 20,000 Bathurst Caribou.

We believe that the current harvest level (even if it is believed the herd is at 20,000 animals) is more than sustainable. The fact that no other group in Nunavut other than those already harvesting from this area can access it restricts the total harvest so no TAH is needed. If your take out the outfitting industry you will be helping the wolves and thus hurting the caribou more than you are helping them..

The GN and the NWMB should know that since 2010 they have managed the harvest of Bathurst caribou correctly and indeed have lead in management practices of harvesting bulls only.

I want to thank you for your time and the opportunity to present this information.