

range. NTI has heard that the sociocultural repercussions, knowledge transmission loss and food insecurity will have serious and long-lasting impacts on Inuit if a moratorium is put into place.

- NTI supports the position of West Kitikmeot Inuit who do **not** support a moratorium of the Bathurst caribou subpopulation at this time.

Specific comments:

- Inuit acknowledge that there has been a decline in numbers of the herd since the early 2000s.
- NTI supports the development of a community-based caribou management plan for the conservation of the Bathurst caribou.
- It is not clear or demonstrated how a harvest of 30 bulls will negatively impact the potential recovery of the population based on the information submitted to the NWMB:
 - “An analysis of the herd’s demography suggests low calf survival rates and low adult female survival rates both contributed to the continuing decline of the Bathurst herd” (Government of Northwest Territories (GNWT) report: page 76). The analysis suggests the primary factors for recovery potential are adult female survival and calf survival, but there is no harvest of female caribou proposed.
 - In the GNWT demographic analysis, the model includes a removal of 70 bulls per year (GNWT report: Table 5, page 116). There is no indication that removal of bulls will negatively impact the potential recovery of the subpopulation.

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