

Peter Kusugak
A/Chairperson
Nunavut Wildlife Management Board
P.O. Box 1379
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Dear Mr. Kusugak,

This submission is in response to the NWMB's public notice on 25 May 2012, to address Fisheries and Oceans Canada's (DFO's) request for decision on twelve items relating to narwhal management in the Nunavut Settlement Area. Although the Government of Nunavut (GN) does not have jurisdiction over the management of marine mammals, the GN remains committed to involvement in management discussions regarding narwhal, given their nutritional, socio-cultural, and economic importance to Nunavummiut.

With respect to DFO's requests for decision:

- 1. Establish Basic Needs Level (BNL) for four narwhal stocks (Somerset Island; Admiralty Inlet; Eclipse Sound; East Baffin Island) and one narwhal population (Northern Hudson Bay) within the Nunavut Settlement Area (NSA).**

Per the NWMB's letter of 22 June 2012, the GN response to this item was submitted separately to the NWMB on June 29, as a late submission to the NLCA s5.6.25 public hearings, set for 11-12 September, 2012.

- 2. Establish Total Allowable Harvests (TAH) for four narwhal stocks (Somerset Island; Admiralty Inlet; Eclipse Sound; East Baffin Island) and one narwhal population (Northern Hudson Bay) within the NSA.**

The GN supports setting TAH at the TALC levels recommended by DFO. The GN believes that this will allow higher levels of harvest for all communities, when accounting for seasonal harvest patterns; while simultaneously ensuring conservation of the stock. The GN supports ongoing and greater efforts by the co-management partners to take into account Inuit Qaujimagatuqangit, update population estimates, and develop alternative methodologies for assessing hunt sustainability (e.g. improved modeling that can assess population dynamics; account for regional differences in struck-and-lost rates).

- 3. Where a Total Allowable Harvest (TAH) has been established for a narwhal stock or population, the annual harvest shall not exceed the TAH.**

The GN supports approving this item, as it is consistent with the terms of the NLCA.

- 4. Establishment of boundaries for five Management Units based narwhal summer aggregations within the NSA.**

The GN proposes that the boundaries for the Somerset Island Management Unit be extended west to the western border of the Nunavut Settlement Area. This would make provision for any westerly movement of narwhal, and prevent any illegal harvest by communities such as Kugluktuk (which is currently excluded from any Management Unit, despite being listed as a Somerset Island harvesting community under Table 1 of the IFMP). The GN supports establishing the other Management Unit boundaries as proposed.

- 5. Once a Community Harvest Limit (All-Season Community Harvest Limit, Summer-Season Community Harvest Limit, Migratory-Season Community Harvest Limit), as established annually by the Regional Wildlife Organization (RWO), has been reached for a particular community, no further narwhal hunting is allowed, unless approved by the RWO under the Marine Mammal Tag Transfer Policy.**

The GN supports approving this item.

- 6. Marine Mammal Tags (Fishing Licences) can only be used to harvest narwhal within the Management Unit they are issued for.**

The GN supports approving this item. However, to prevent inter-community conflict, we would suggest that the RWOs develop a protocol for individuals or communities to request tags from other management units (e.g. for hunters who want to hunt narwhal in a community outside of their management area).

- 7. Partition the annual narwhal harvest according to narwhal migration for the East Baffin Island, Eclipse Sound and Admiralty Inlet Management Units. This would divide the annual harvest between two distinct seasons: Summer-Season and Migratory-Season, according to the dates recommended annually by each Hunters and Trappers Organization (HTO) that harvest from the Management Unit.**

The GN supports approving this item. While recognizing that seasonal harvest limits will increase the complexity of the management system, the GN believes that accounting for seasonal harvest patterns will allow higher levels of harvest for all communities, as well as longer harvest seasons.

- 8. Establish mechanisms to close specific narwhal fisheries in each Management Unit when specific harvest limits have been reached.**

The GN supports approving this item.

- 9. Measures to reduce struck and lost narwhal: All narwhal hunting communities should develop written plans that include practical measures for hunters to reduce the number of struck and lost narwhal.**

The GN supports HTO rights to govern harvest by their members at their discretion. If this item is approved, the wording should be changed to more reflect a recommendation to the HTOs rather than an implied requirement; furthermore, it should be specified that the community hunting plans

cannot be enforced by Fishery Officers, and do not need to be provided to other parties, unless desired by the HTO.

10. Harvest reporting is required by the Regional Wildlife Organizations (RWO) and Hunter and Trappers Organizations (HTO) annually.

The GN supports approving this item, as it is consistent with the terms of the NLCA.

11. Tusks from landed narwhal need to be inspected and certified by a Conservation Officer or Fishery Officer. The permanent attachment device would be used to affix the tusk to the Marine Mammal Tag, as part of the certification process.

The GN supports this item. As part of the Operational Process for Marine Mammal Tag Distribution, Harvest Reporting and Tusk Certification, DFO should identify how they will ensure that communities without Conservation Officers or Fishery Officers will be able to have their tusks certified in a timely manner.

12. Approve the Integrated Fisheries Management Plan for Narwhal in the Nunavut Settlement Area (effective date 2013) and Phase One of the Marine Mammal Tag Transfer Policy described in it.

The GN supports the approval of the Integrated Fisheries Management Plan for Narwhal in the Nunavut Settlement Area, with the understanding that this is a living document. Prior to approval, the GN recommends that several changes be made to the IFMP:

- s3.2.3 Traditional Knowledge be expanded and detailed to give this section equal weight with the more comprehensive descriptions of narwhal science results e.g. include specific statements such as “Whales in the High Arctic are described as larger than whales in Admiralty Inlet and Eclipse Sound, with wider and longer tusks”; or “Communities noted that Northern Hudson Bay whales are resident in their summering area for longer than Somerset Island whales”.
- Table 2.1 (p. 18) be updated to reflect the 2011 Northern Hudson Bay survey results, as per DFO’s May 28 Addendum to the Request for Decision.
- Figure 3 (p. 19) be updated to reflect local knowledge of narwhal distributions e.g. Northern Hudson Bay narwhal summering in Wager Bay.
- The “Long Term Sustainability-Abundance Estimates” section (p. 20) be updated to reflect the 2011 Northern Hudson Bay survey results, as per DFO’s May 28 Addendum to the Request for Decision.
- References to trade restrictions for the Northern Hudson Bay population should be removed from the “Convention on International Trade in Endangered Species” section (p. 24), as per DFO’s May 28 Addendum to the Request for Decision.
- For clarification, s3.7.1 should be adjusted to read:
“All narwhal tusks will require a Marine Mammal Tag or Letter of Certification (for tusks not originating from a harvest e.g. found tusks) to be considered legal.”
- For clarification, s3.7.7 should be adjusted to read:
“Possession of tusks that are untagged or not accompanied by a Letter of Certification (for tusks not originating from a harvest e.g. found tusks) is illegal.”
- s3.8 currently implies that DFO is involved in the sub-allocation of the BNL for the Baffin Bay management units, rather than participating in the annual meetings simply to run the Harvest Allocation Model. s3.8 should be adjusted to read:

“Annual meetings will be held between RWOs and HTOs to coordinate the sub-allocation of the BNL for the Baffin Bay management units. It is expected that DFO will initially participate in these meetings to provide guidance on how to operate the Harvest Allocation Model and interpret its results; but once RWOs become familiar with the Harvest Allocation Model, DFO may not need to participate in these meetings.”

In addition, the GN here submits for the NWMBs consideration during the narwhal IFMP public hearing process, data that has been analyzed from our Nunavut Coastal Resource Inventory (NCRI). Currently, the GN is the only co-management partner to be collecting local knowledge of narwhal in a systematic and rigorous fashion. The NCRI interviews hunters in each community to create a snapshot of the current knowledge of the coastal species in the areas travelled near that community. To date we have completed inventories in Igloolik, Kugluktuk, Arctic Bay, Chesterfield Inlet, Qikiqtarjuaq, Sanikiluaq, Kimmirut, Iqaluit, Gjoa Haven, and Repulse Bay.

In addition, we submit notes taken by GN staff during the community consultation tours that were conducted in 2011 and 2012 on narwhal science and management, as hunters and HTO members described some of their excellent knowledge of narwhal during these meetings.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Devin Imrie', with a stylized flourish at the end.

Devin Imrie
A/Director, Fisheries and Sealing Division