

RICHARD SPAULDING

BARRISTER AND SOLICITOR

May 4, 2015

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

Dear Mr. Akearok:

Re: NWMB public hearing to strike a Basic Needs Level in accordance with Article 5 of the Nunavut Agreement, Southampton Island Caribou

On behalf of Nunavut Tunngavik Incorporated (NTI), I am attaching the following for filing with the Nunavut Wildlife Management Board (Board):

Witness Statement of Inuapik Ell, April 29 2015

Witness Statement of Glenn Williams, May 1, 2015

Documents relied on by NTI:

1. Home pages of Kivalliq Arctic Foods, Kitikmeot Foods, Pangnirtung Fisheries, Papiruaq Fisheries (May 3, 2015):
<http://ndcorp.nu.ca/subsidiaries/kivalliq/>
<http://ndcorp.nu.ca/subsidiaries/kitikmeot/>
<http://ndcorp.nu.ca/subsidiaries/pangnirtung/>
<http://ndcorp.nu.ca/subsidiaries/papiruaq-fisheries-ltd/>
2. "Kivalliq Arctic Foods manager says goodbye" (North News Services, April 25, 2012)
http://www.nnsl.com/frames/newspapers/2012-04/apr25_12ck.html

NTI explanation of reliance on documents

These materials are filed pursuant to Direction #6 of the Board's Directions for Pre-Hearing Disclosure dated March 26, 2015.

NTI requests that, when the public hearing resumes, the Board have the witnesses called by the Government of Nunavut (GN or Government) and NTI sworn before giving their evidence, and that counsel for the GN and NTI have the opportunity to cross-examine the witnesses called by the other party.

Of the Nunavut Bar

For the Board's information, Glenn Williams' witness statement provides the notes of Mr. Williams' phone conversation with Richard Connelly already reported to the NWMB in NTI's May 2, 2014 Reply (at pages 21-22, footnotes 33-35). This conversation also was the source of NTI's assertions of fact concerning how hunters were paid, at pages 17 and 21 of the Reply.

Because Richard Connelly was the GN's lead official on the abattoir project located in Coral Harbour for a number of years, NTI asked Mr. Connelly to provide his own witness statement and to be available to appear as a witness at the hearing. Mr. Connelly advised that, due to his business commitments, he does not wish to do so. NTI has decided not to request that the Board subpoena Mr. Connelly, and for this reason plans to call Mr. Williams as a witness to the facts that Mr. Connelly reported. NTI would have no objection to the Board subpoenaing Mr. Connelly, either of the Board's own accord or at the request of the GN.

I can also advise as follows:

1. NTI intends to rely on certain background information regarding the context of the *Nunavut Agreement* and the history of the Coral Harbour abattoir project, contained in the following academic publications (also attached):

“A study of enterprise in Rankin Inlet, Nunavut: where subsistence self-employment meets formal entrepreneurship”

Aldene Meis Mason, Leo Paul Dana
and Robert Brent Anderson

Int. J. Entrepreneurship and Small Business, Vol. 7, No. 1, 2009

“The Inuit commercial caribou harvest and related agri-food industries in Nunavut”

Aldene Meis Mason, Leo Paul Dana
and Robert Brent Anderson,

Int. J. Entrepreneurship and Small Business, Vol. 4, No. 6, 2007

NTI intends to rely on portions only of these publications, to be quoted or cited in NTI's final written reply. I have provided copies of the first publication above previously to counsel for the GN and Board. In case the Board chooses to treat the passages that NTI will rely on as “documents” for purposes of the Board's Directions, I am also attaching brief explanations of the reliance that NTI plans to place on those passages.

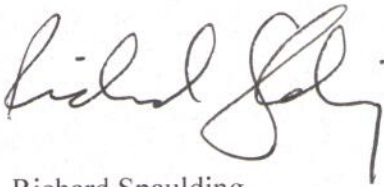
2. NTI has interviewed one further individual whom NTI anticipates calling as a witness. Unfortunately, this resident of Coral Harbour has been travelling since the interview and unable to review the witness statement that NTI has drafted. I anticipate that NTI will be in a position to file this statement by May 15.
3. NTI is endeavouring to obtain and review a copy of the Canada-NWT Economic Development Agreement, 1996-2001, referred to in the documents that the GN has filed.

According to the GN documents, this agreement was the primary source of government funding for the Coral Harbour abattoir project. I anticipate that NTI will be able to review this agreement, and decide whether to request that the Board consider it in this proceeding, by May 15.

4. Once NTI has the witness statement and has reviewed the agreement noted above, I will be in a position to certify that NTI has complied with the Board's directions to date.

For the Board's information, on April 20, 2015 NTI provided the GN with written questions arising from the Government's filed witness statements and documents, pursuant to Board Direction # 12. NTI informed the Government that the answers would assist NTI in finalizing NTI's witness statements and documents. As of this date, the Government's counsel has confirmed receipt of NTI's questions, but NTI has not received answers.

Yours truly,

A handwritten signature in cursive script, appearing to read "Richard Spaulding".

Richard Spaulding