

February 11, 2020

Mr. Daniel Shewchuk Chairperson Nunavut Wildlife Management Board P.O. Box 1379, Iqaluit, NU XOA 0H0

Dear Daniel.

RE: NWMB Public Hearing to Consider a Modification of the Total Allowable Harvest for Bathurst Caribou

Nunavut Tunngavik Incorporated (NTI) thanks the Nunavut Wildlife Management Board (NWMB) for the opportunity to participate in this process.

General comments:

- The Nunavut Agreement recognizes Inuit harvesting and decision-making rights and Inuit systems of wildlife management that contribute to wildlife conservation.
- The Nunavut Agreement also recognizes the extensive powers of self-regulation of the Hunters and Trappers Organizations (HTOs) and Regional Wildlife Organizations (RWOs).
- Any quantitative or non-quantitative limitations on Inuit caribou harvesting can only be imposed to the extent necessary to effect a conservation concern.
- For the purpose of wildlife conservation, or the maintenance of vital and healthy
 wildlife populations capable of sustaining Inuit harvesting needs, it is the responsibility
 of the NWMB and the Government to avoid limitations on Inuit harvesting that are
 beyond the extent necessary. Inuit have always understood—and put into practice—
 that a sustainable harvest depends on principles of conservation.
- Across Nunavut, community-based wildlife management is increasingly recognized to facilitate the meaningful consideration of *Inuit Qaujimajatuqangit* in wildlife management processes, decision-making and outcomes.
- The hardships faced by Indigenous peoples of the Northwest Territories (NWT) across
 the range of the Bathurst herd are not lost on Inuit. However, the sociocultural
 benefits associated with minimal harvest opportunities to support *Inuit*Qaujimajatuqangit are critical especially to Inuit who continue to live in the caribou

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.

Prepared by: Department of Wildlife and Environment, Nunavut Tunngavik Inc.