



February 11, 2020

Mr. Daniel Shewchuk
Chairperson
Nunavut Wildlife Management Board
P.O. Box 1379, Iqaluit, NU
X0A 0H0

Dear Daniel,

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

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 restrictions 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 possible for the NWMB to place as little limitations as necessary on Inuit harvesting. Inuit have always understood—and put into practice—that a sustainable harvest depends on 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.
- NTI has heard that the sociocultural repercussions, knowledge transmission loss and food insecurity will have serious and long-lasting impacts on Inuit if a severe reduction is put into place. It may also erode the public confidence in both regional and local

management systems that have made extraordinary efforts to conserve wildlife populations in the region.

- NTI supports the position of West Kitikmeot Inuit who do not support the GN proposal at this time.

Specific comments:

- Inuit acknowledge the decline in numbers since 2010. However, there remains some uncertainty in the exact number of caribou.
- NTI supports the development of a community-based caribou management plan for the conservation of the Bluenose East caribou in Nunavut.
- NTI supports the view of the Kugluktuk HTO that the community caribou management plan is a compelling, suitable and viable alternative management response to achieve the conservation of the Bluenose-East herd in Nunavut.
- NTI echoes the stated position of Kugluktuk HTO and Inuit that an overly restrictive quantitative limit should only be used when all other conservation measures have been exhausted.
- For example, in 2016, the NWT's Sahtú Renewable Resources Board (SRRB), having accepted the principle of self-regulation driven by community-based monitoring and decision-making as an effective basis for caribou management, favoured the Délı̄nę caribou conservation plan over a government-imposed quota to meet the conservation needs of Bluenose-East caribou.
- The community of Colville Lake also presented to the SRRB a community-based caribou conservation plan guided by Dene laws and customs. The session, organized by the SRRB, provides clear illustrations of the relevance of Indigenous ways of life and knowing in wildlife management systems based on mutual respect and community-level empowerment.
- NTI stresses that the conservation concern identified for this population should first be addressed through adoption of the KHTO's community-based caribou management initiative, in accordance with section 5.7.3 of the *Nunavut Agreement*.
- NTI emphasizes that the *Nunavut Agreement* stipulates that a TAH can only restrict Inuit harvesting to the extent necessary (s. 5.3.3), and that an NQL cannot unduly constrain Inuit harvesting activities (s. 5.6.50).
- Over the last five years, Kugluktuk Inuit have also harvested Bluenose-East caribou in numbers that are well below the established TAH. Therefore, a reduction in the TAH may not be necessary if the harvest is already being managed by the community. However, an imposed reduction against the wishes of the community will only erode confidence and trust in the management system.

- Over the same duration, Kugluktuk Inuit have harvested Bluenose-East caribou at a male-to-female ratio of about 1.3:1. This is in part due to variation in seasonal preferences of Inuit harvesters. A bull only NQL would therefore not only impose a sex selective restriction but also diminish Inuit cultural practices significantly.
- Taking these considerations into account, NTI supports the objections of Kugluktuk Inuit to reduce the TAH from 340 to 107 caribou and the establishment of a male-only harvest NQL.
- NTI believes that the sociocultural repercussions, knowledge transmission, loss and food insecurity must also be considered in the evaluation of the potential impact of the proposed limitations on the Inuit harvest of Bluenose-East caribou.

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