

To (C) くつして しんく へん へんしん として Tuglia Ministam, Avatiliqiyikkut
Deputy Minister, Department of Environment
Sous-ministre, Ministère de l'Environnement

James Eetoolook Vice-President Nunavut Tunngavik Inc. May 6, 2016

Daniel Shewchuck Acting Chairperson Nunavut Wildlife Management Board

Re: Public Hearing of the Nunavut Wildlife Management Board to consider regional total allowable harvests for the Bluenose East and Bathurst caribou herds

Dear Sirs;

Thank you for your correspondence of April 8, 2016 and April 18, 2016 seeking agreement that should the Nunavut Wildlife Management Board (NWMB) establish total allowable harvest (TAH) levels for the Bluenose East and/or the Bathurst caribou herds, then the TAH should be reserved entirely for Inuit, pending the striking of a required basic needs level (BNL) at a later date.

We are not opposed to the concept behind this proposal. However, in the interests of being more consistent with the Nunavut Land Claims Agreement (NLCA), specifically sections 5.7.3 and 5.7.6, we suggest that the Regional Wildlife Organization (RWO), and the Hunters and Trappers Organizations (HTO) at the community level, should have the ability to allocate to users other than Inuit should they choose to.

The NLCA clearly gives the RWO's and HTO's the jurisdiction for making regional/community decisions on allocations of the BNL. While in this case we will be dealing with a TAH in the absence of a BNL, It would seem inconsistent with the spirit of the NLCA for an allocation decision such as this to be made by the GN, NTI, and NWMB, and it is not clear to us where the authority to do so would come from.

There are at least two circumstances where an HTO may choose to allocate some of their share of the TAH to non-Inuit:

- Within a region/community, an RWO/HTO could choose to allocate/assign some of their share of the TAH to non-Inuit residents
- Within a region/community, an RWO/HTO could choose to allocate/assign some of their share of the TAH to outfitters for the sports hunting industry.

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By deciding now that the entire TAH should go to Inuit, we would in effect be preventing the RWO/HTO's from allocating the TAH according to their own needs, priorities, and preferences.

We support the concept that in the current case of a TAH being set in the absence of a BNL for Bluenose East and Bathurst caribou, none of the TAH should be set aside for non-Inuit, sports hunting, and commercial operations – essentially it is all allocated to Inuit. However, we propose that this should not prevent the RWO or an HTO from allocating a portion to other users should they choose to.

Sincerely,

Steve Pinksen

Assistant Deputy Minister