

Qikiqtaaluk Wildlife Board



Qikiqtaaluk Wildlife Board

Daniel Shewchuk
A/Chairman
Nunavut Wildlife Management Board
Iqaluit, Nu
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August 12, 2016

Re: QWB Submission for Written Hearing on Flexible Quota System & Carry Forward Policy Phase II

QWB appreciates the opportunity and now providing it's comments as per the notification on the written hearing on Flexible Quota System and Carry Forward Policy Phase II

Carry Forward Policy Phase II

While QWB doesn't have any objections or concerns with the current "tag transfer & carry forward policy" but simply support the policy to proceed as it provides each community an opportunity to maximize their harvest in their current summering stocks and migration (mixed stock) tags which enables them to carry forward their unused tags for the following harvest season.

Narwhal Flexible Quota System

QWB had the impression once NWMB written hearing was announced that DFO was providing a modification with "Integrated Fisheries Management Plan on Narwhals" (IFMP) to provide further clarification with "Flexible Quota System" policy implementation.

Upon review of all information submitted to NWMB by DFO, there is only minimal information how the actual policy is being developed, interpreted and implemented. The actual flexible quota system document has produced more questions to DFO science to verify which nullifies the policy development for flexible quota system. This proves that more direct communication and consultation with communities is required by DFO and it's co-management partners.

While QWB appreciates DFO proposing to increase 5 of 6 stocks using the flexible quota system. The application of "**flexible quota system**" to modify the total allowable landed catch is confusing when one of their submissions clearly indicated the actual policy requires further verification by DFO science with questions raised by the communities.

Eclipse Sound Summering Stock

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QWB will not argue with the proposed increases to 5 stocks but will comment on the Eclipse Sound summering stock and proposed decrease of TALC 236 to 134. QWB will like to make couple key points for consideration;

1. Scientific Study:

It's commendable for DFO conducting the scientific survey and providing their study results and conducting community consultations. The question that needs to be raised is: the other survey conducted coinciding with DFO survey was by LGL limited and if comparisons of these two close proximity surveys were done. It was recently brought to the attention of QWB, the LGL survey on marine mammal aerial survey has been published and submitted to Nunavut Impact Review Board as Baffinland EIS process. Currently, QWB doesn't have the expertise or the capacity to have these published reports fully reviewed and compared for further commenting.

The other item to consider is the submission by Mittimatalik HTO with regards to their displeasure how the survey was conducted (Letter dated May 27, 2016).

2. Inuit Qaujimajatuqangit

QWB feels Inuit Qaujimajatuqangit should play a key part in the decision making process especially for Eclipse Sound stock. With NWMB conducting IQ interviews with the 4 communities with two tag system; Pond Inlet elders, harvesters and previous harvesters should be a priority to be interviewed with their observations of narwhals, migration, behavioural and summering patterns of each decade going as far as 1980s to present.

The questionnaire should include: pre-shipping traffic and with shipping traffic, with migrations, summering congregation changes in the area of shipping traffic and Killer whale sightings, if there is any increase sightings.

From Inuit point of view, with amount of ship traffic in the area of Eclipse Sound, it's evident the narwhals have moved to more less shipping traffic and noise or from possible increased predation as we see the summering stock for Admiralty Inlet and Somerset Island have increased in population.

3. Baffinland Surveys

It's imperative, for NWMB to make a well informed and sound decision, QWB is encouraging NWMB to have access to the LGL survey published report and compare the Eclipse Sound narwhal studies by DFO and LGL Limited to see if the



studies have the same results of current estimates produced by Department of Fisheries and Oceans.

4. Aerial Photographic Survey

With DFO conducting a photographic survey in the summer of 2016, it's highly recommended the decision by NWMB be further delayed, while waiting for second survey results. This will give an opportunity for DFO to reconsider their survey results and opportunity for NWMB Staff to review the LGL survey.

Conclusion:

- Carry forward policy be approved as proposed so the Inuit narwhal harvesters can maximize their harvest if there are any unused tags from previous year.
- QWB feels the decision for the proposed changes to Eclipse Sound TALC by DFO be differed based on further evidence are available to compare and conducting another survey and confusion over administrative policy over actual TAH.
- IQ collection on narwhal has recently been established, with limited amount of time to collect for NWMB before September meeting, a differed decision will enable the NWMB IQ coordinator collect the necessary information accurately.
- With the proposal to decrease of one summering stock, QWB acknowledges a full public hearing is more appropriate than a written hearing. This procedural process of written hearing will set precedence if this proceeds and enable the Federal and territorial agencies to try attempt written process more which QWB feels, we'll be heading back to pre-NLCA which Inuit will not be heard.
- QWB is strongly recommending to NWMB to differ any decision based on the information received, as the notice of written hearing has advertised for Flexible Quota System and Tag transfer Policy Phase II but the documentation relevant are all based on the proposed new total allowable landed catch and DFO's 2013 scientific survey published report which again, QWB feels it better to hold a face to face public hearing.



Noah Mosesee, Vice-Chair
Qikiqtaaluk Wildlife Board



Qikiqtaaluk Wildlife Board

◀◀ 12, 2016

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