3 March 2010

Grant Pryznyk Interim Chair Wek'èezhìi Renewable Resources Board 102A, 4504 – 49<sup>th</sup> Ave. Yellowknife NT X1A 1A7

Dear Mr. Pryznyk:

### 2009 Bathurst Caribou Joint Proposal

I am writing on behalf of the Beverly and Qamanirjuaq Caribou Management Board (BQCMB) regarding the joint proposal on caribou management actions in Wek'èezhìi submitted to the WRRB by the Tlicho Government and the Government of the Northwest Territories (GNWT). Our Board is extremely interested in decisions that will follow from your review process and the management actions that your Board will recommend to the GNWT's Department of Environment and Natural Resources (ENR) and the Tlicho Government.

The BQCMB supports the WRRB's efforts to ensure the survival of caribou for current and future generations. We know that you and your Board and staff are working very hard on these difficult issues and we are encouraged that caribou conservation is such a high priority for both the Tlicho and NWT governments.

However, our Board has concerns regarding the joint proposal and would like to provide some input on proposed management and monitoring actions. Our understanding is that all written submissions received by today, as well as verbal presentations to your public hearing later this month, will be considered by the WRRB to make decisions and recommendations for developing and implementing short and long-term conservation measures. Therefore we are submitting our comments and recommendations for your consideration to assist your development of sound decisions in support of caribou conservation.

#### I will provide below:

- A. Background on the BQCMB and why we are interested in your review of this joint proposal.
- B. Comments and concerns about the joint proposal from the BQCMB's perspective.
- C. Recommendations for the WRRB to consider as you make decisions and develop recommendations for management actions by the GNWT-ENR and Tlicho Government.

### A. About the BQCMB

The BQCMB is a co-management advisory board that works with governments, communities, industry and other organizations to develop recommendations for conservation and management of the Beverly and Qamanirjuaq caribou herds and their ranges. These two herds are a key part of the economic, cultural, and spiritual life of about 20 communities on or near their ranges in the Northwest Territories (NWT), Nunavut, Saskatchewan and Manitoba. The total annual net economic value of the harvest from these herds in 2005-2006 was estimated at more than \$20 million.

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Board members represent communities across the caribou ranges, four territorial and provincial governments and the federal government, with eight community members and five government members. Two community representatives have been appointed to the Board from each of four regions: Dene and Metis communities of the South Slave region of the NWT, southern Kivalliq (Keewatin) region of Nunavut, northern Saskatchewan and northern Manitoba.

The BQCMB works primarily in the interest of traditional caribou users and their descendents, based on the cooperative partnership between governments and communities that has been developed over more than 25 years, since the Board was established in 1982. The BQCMB's mission is "to ensure the long-term conservation of the Beverly and Qamanirjuaq caribou herds for Aboriginal communities who wish to maintain a lifestyle that includes the use of caribou, as well as for all Canadians and people of other nations". The BQCMB published the first management plan for the Beverly and Qamanirjuaq caribou herds in 1987, and has since reviewed and revised the plan twice. The current Beverly and Qamanirjuaq Caribou Management Plan 2005-2012 is available on the Board's website at: http://www.arctic-caribou.com/PDF/Management\_plan 2005 2012.pdf.

### BQCMB interest in management actions for Bathurst caribou

The BQCMB is keenly interested in conservation of the Bathurst herd and any management actions implemented for caribou in Wek'èezhìi that may affect the Beverly herd, either directly or indirectly, intentionally or otherwise. This interest exists primarily because of the following factors.

a) Overlap in seasonal ranges of Bathurst and adjacent caribou herds, including the Beverly herd. - It has been known for many years that there is overlap of Bathurst and Beverly caribou ranges in the area south and east of Great Slave Lake, with both herds wintering in some years as far south as northern Saskatchewan. More recent information from tracking caribou with satellite and GPS collars has shown that these two herds may use overlapping areas during other seasons in some years, including during spring and fall migrations east of Lutsel K'e. A map showing recent range use of a limited number of collared Beverly caribou in relation to the Bathurst and other NWT caribou herds is provided as Attachment A.

As a result of this range overlap, hunters seeking caribou east of Wek'èezhìi may at certain times harvest caribou from the Bathurst or neighbouring herds with which it overlaps, including the Beverly herd.

b) Decline of the Beverly herd. - Recent reconnaissance surveys of the Beverly calving ground conducted by the GNWT-ENR suggest that the herd has seriously declined. This is based on the dwindling numbers of cows seen during surveys in 2007, 2008, and 2009 on the Beverly calving ground during the calving period in June. Fewer than 100 adult caribou were counted during the 2009 Beverly calving ground survey, compared to more than 5,700 adult caribou counted on the calving ground in 1994 using comparable methods. More details are provided in Attachment B.

At the very small numbers indicated by these surveys, the Beverly herd is very vulnerable and cannot withstand continued harvest at previous levels, and certainly not increased harvest. The smaller the herd becomes, the more difficult recovery will be.

c) Reduced availability of caribou to communities traditionally dependent on the declining Beverly herd. – Reduced availability of caribou for NWT communities that have traditionally

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hunted both Beverly and Bathurst caribou in certain years (such as Lutsel K'e) may be accelerated by competition for harvest from these declining herds with hunters from outside their communities. Even greater reductions in caribou availability may occur for some of the northern Saskatchewan communities that have hunted these herds in winters when they migrate to southern NWT or northern Saskatchewan, because seasonal ranges contract as the herds decrease in size. This may also be a factor for hunters in Baker Lake, Nunavut, who have also traditionally hunted Beverly caribou.

Further reductions in the size or accessibility of herds with overlapping ranges, including the Bathurst and neighbouring herds to the east, and particularly the Beverly herd, may create greater hardship for communities that have traditionally harvested Beverly caribou in the NWT (Lutsel K'e, Ft. Resolution, Ft. Smith), northern Saskatchewan (five Athabasca Denesuline communities), and Nunavut (Baker Lake).

**B.** Comments and concerns about the joint proposal from the BQCMB's perspective Our comments are limited to those proposed actions which may have impacts on Beverly caribou or people who have traditionally harvested Beverly caribou, as per the mandate of the BQCMB.

## General comments on the joint proposal:

- The proposal claims that the proposed management actions will "help the Bathurst, Bluenose East, and Ahiak herds to recover". No mention is made of the Beverly herd or the impacts these proposed actions might have on the recovery of Beverly caribou. This is a major oversight.
- 2) Implementing measures to reduce harvest pressure on one declining herd (in this case the Bathurst herd) by promoting increased harvest on other declining herds (such as the Beverly herd) is counter-productive. Diverting harvest pressure onto other herds should only be considered if there is current monitoring information available that shows that those herds can sustain additional harvest and remain strong and healthy with a stable or increasing trend.
  - Encouraging the Tlicho communities to hunt caribou to the east of Wek'èezhìi (described in the proposal as the Ahiak or Inuit herd) may increase hunting pressure on all herds overlapping with the eastern portion of the Bathurst range, including the declining Beverly herd. This could have significant negative impacts on what remains of the Beverly herd. In fact, any increased hunting pressure on this herd could virtually prevent any chance of the herd's recovery if the last remaining animals that have been calving on the Beverly calving ground are killed. This would extinguish the herd's "memory" of its traditional migratory patterns and calving grounds. It would also reduce the diversity of caribou.
- 3) Encouraging hunters to intrude on hunting territories of other communities without their consent is also not appropriate. This is an especially serious issue if those communities whose hunting territories may be encroached upon by outsiders are experiencing hardship resulting from reduced availability of caribou due to population declines or changes in seasonal migration patterns.

Encouraging Tlicho people to hunt to the east of Great Slave Lake in fact could bring more hunters into an area that has already experienced decreased availability of caribou as a result of the crash of the Beverly herd, the decline of the Bathurst herd, and the likely decline of the Ahiak herd. Therefore this could increase the hardship for traditional hunters from Lutsel K'e.

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4) The BQCMB supports development of a comprehensive monitoring program for Bathurst caribou and neighbouring herds that includes frequent assessment of herd status and trend, tracking of seasonal distribution and movements, regular monitoring of indicators of caribou population health and range condition, and monitoring other environmental parameters that may affect herd recovery (such as predators). A lack of monitoring for the Beverly herd over more than 10 years is largely responsible for missed opportunities to develop management actions that might have been effective at early stages of the herd's decline, as well as current uncertainty about the status and seasonal movement patterns of the herd.

# Specific comments on proposed management actions:

Action No. 4 – Reduce harvest pressure (females).

- The BQCMB generally supports efforts to eliminate or greatly reduce harvest pressure on female caribou of declining herds to increase adult female survival. The importance of this measure and the difference it could make for declining herds needs to be understood and supported by communities to be effective, however, and this will require significant efforts toward consultation and education.
- The proposal states that "No harvest of cows would be allowed when herds are mixed together on the winter range.", but there are very few satellite-collared female Beverly caribou. By what means will movements of Beverly caribou be tracked to ensure that Beverly cows are not harvested when they are mixed with other herds on the winter range?
- Encouraging even limited harvest of females from herds to the east of Wek'èezhìi could have serious impacts on the Beverly herd, as hunters will not be able to distinguish Bathurst from Beverly from Ahiak caribou. Therefore we cannot support diverting female harvest from Bathurst to Ahiak herds as proposed by the GNWT.

#### Action No. 5 - Reduce harvest pressure (males).

- The BQCMB generally supports efforts to reduce harvest pressure on male caribou of declining herds to increase bull survival.
- The proposal recommends harvest of Ahiak caribou males in the fall, and states "mobile harvesting zones to be determined based on the seasonal distribution of collared caribou". But because there are very few satellite-collared female Beverly caribou, how will mobile harvesting zones that exclude Beverly caribou be located?
- As for females, encouraging even limited harvest of bulls from herds to the east of Wek'èezhìi could have serious impacts on the Beverly herd, as hunters will not be able to distinguish Bathurst from Beverly from Ahiak caribou. Therefore we cannot support diverting male harvest from Bathurst to Ahiak herds as proposed by the GNWT.

### Action No. 6 - Public and Hunters Education

- The BQCMB supports multi-party initiatives that include co-management boards and communities. We encourage WRRB to involve boards (including the BQCMB) and communities in discussions of proposed management actions that may affect caribou herds and people that depend on caribou outside Wek'èezhìi.
- The BQCMB would support development of a DVD production on traditional and ethical hunting practices. We encourage WRRB to consider making such a product available to others, including the BQCMB, so that it can be adapted for use in other regions and communities to encourage good hunting practices for all caribou herds.

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### Action No. 7 - Compliance

 The BQCMB supports management action to reduce wastage of meat. Wastage is a problem recognized by communities across the Beverly and Qamanirjuaq caribou ranges. Significant efforts should be made in the areas of education, consultation, and compliance to eliminate wastage as a recovery action for declining herds.

### Action No. 8 – Protection of Calving Ground

- The BQCMB would be very interested in learning the results of consultation and collaboration between the governments of NWT and Nunavut about calving ground protection, as our Board has been working toward long-term protection of calving grounds for many years. A BQCMB paper completed in September 2004 described action needed to protect Beverly and Qamanirjuaq caribou and caribou range, and recommended long-term legislated protection of calving and post-calving areas. The full technical paper is available on the Board's website at: <a href="http://www.arctic-caribou.com/PDF/Position\_Paper.pdf">http://www.arctic-caribou.com/PDF/Position\_Paper.pdf</a>; the English version of the plain language summary (also available in Inuktitut and Dene) is also available on-line at: <a href="http://www.arctic-caribou.com/PDF/PLV\_English\_web.pdf">http://www.arctic-caribou.com/PDF/PLV\_English\_web.pdf</a>.
- What is the current level of protection for the Bathurst calving ground, and will maintaining that level of protection "ensure that no exploration or mining activities take place during the calving and post-calving periods"?

### Action No. 9 – Mandatory Harvest Reporting System

- The BQCMB would support such a system and would urge that it include reporting of the number and location of caribou harvested by Tlicho hunters outside Wek'èezhìi.

#### Recommendations from the BQCMB

- 1) The WRRB should recommend management actions to the GNWT-ENR and the Tlicho Government for caribou conservation within Wek'èezhìi that will effectively conserve the Bathurst caribou herd and ensure its continued existence over the long-term.
- 2) Any management actions the WRRB recommends to the GNWT-ENR and the Tlicho Government for caribou conservation within Wek'èezhìi should fully consider effects these actions may have on other caribou herds, particularly the declining Beverly herd, as well as potential effects on communities that depend on these other caribou herds.
  - In general, recommended management actions should not shift problems to neighbouring herds and communities that depend on them. Specifically from the BQCMB's perspective, conservation measures for the Bathurst herd must not be implemented at the expense of the Beverly herd, on which caribou-harvesting communities in the NWT (Lutsel K'e, Ft. Resolution, Ft. Smith), northern Saskatchewan (five Athabasca Denesuline communities), and Nunavut (Baker Lake) have traditionally depended.
- 3) Recommendations by the WRRB to the GNWT-ENR and Tlicho Government for caribou conservation within Wek'èezhìi should be accompanied by recommendations for thorough consultation with communities and co-management boards outside Wek'èezhìi that may be directly affected by the management actions. This would include the Beverly caribou range communities in NWT, northern Saskatchewan and Nunavut, as well as the Beverly and Qamanirjuag Caribou Management Board.

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4) The WRRB should recommend monitoring actions to the GNWT-ENR and the Tlicho Government that will provide information about changes in population status, trend and health; the effectiveness of management actions; and required changes to management actions to ensure herd recovery. Concerted efforts should be made to provide information to hunters and their communities about the need for harvest monitoring, the value of harvest data in management, and its role in herd recovery efforts.

We urge you to think broadly about the potential impacts of your recommendations on both caribou and people who depend on caribou outside of Wek'èezhìi. This must include consideration of a) caribou herds whose ranges overlap with the Bathurst herd, especially the extremely vulnerable Beverly herd, and b) people that depend on those herds and live outside Wek'èezhìi in the NWT's South Slave region, the Athabasca region of northern Saskatchewan, and Baker Lake Nunavut.

Thank you for the opportunity to submit comments and recommendations from the BQCMB.

If you have any questions about this submission, please contact the BQCMB Biologist, Leslie Wakelyn (wakelyn@theedge.ca) or Secretary-Treasurer Ross Thompson (rossthompson@mts.net).

Sincerely,

Albert Thorassie BQCMB Chairperson

Attachments

cc: Chief Steven Nitah, Lutsel K'e Dene First Nation

Chief Louis Balsillie, Deninu Kue First Nation Chief Frieda Martselos, Salt River First Nation

Betty Villebrun, President, Northwest Territory Metis Nation

Vice Chief Don Deranger, Prince Albert Grand Council

Ron Robillard, Chief Negotiator, Athabasca Denesuline Negotiation Team

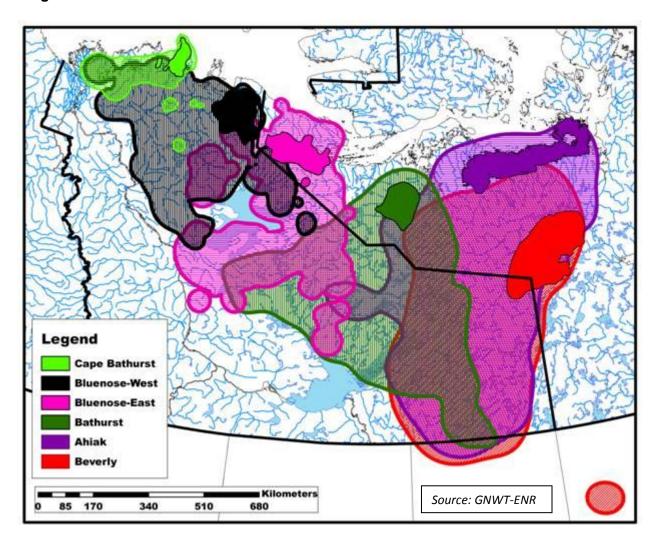
Willie Nakoolak, A/Chairperson, Nunavut Wildlife Management Board

Richard Aksawnee, A/Chairperson, Baker Lake HTO

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Attachment A: Map showing overlap of ranges used by the Bathurst, Beverly and other NWT caribou herds, based on location data from caribou tracked with satellite and GPS collars.

Solid areas are calving grounds; hatched areas are year-round ranges. Note that the Beverly range is based on recent and limited data.



## Attachment B: About the Beverly Herd

(Excerpt from backgrounder to BQCMB press release, 1 March 2010)

The Beverly herd's range has historically extended from northern Saskatchewan through the Northwest Territories (NWT) to Nunavut. The estimated annual economic value of the Beverly caribou harvest was about \$4.9 million for 2005-2006. The greatest proportion of the Beverly harvest has been by five communities in northern Saskatchewan, where most animals are taken for Aboriginal domestic use. The Beverly herd has also been hunted by residents of Lutselk'e, Fort Smith and Fort Resolution in NWT, and Baker Lake in Nunavut.

The size of the Beverly herd was last estimated in 1994 at about 276,000. A current estimate of the herd's size isn't known. However, the Government of the Northwest Territories (GNWT) carried out systematic reconnaissance surveys on the Beverly calving ground during the June calving period in the last three years (2007, 2008, 2009), and these surveys indicate that the herd has suffered a major population decline since 1994. (In 2007, the GNWT attempted a calving photo survey to help estimate the size of the Beverly population but it could not be completed due to bad weather.)

According to the GNWT, results of these recent reconnaissance surveys of Beverly caribou provide two key types of information:

a) the numbers of adult caribou seen during June surveys on the calving ground were significantly lower than in past years

Year of Survey	Number of Adult Caribou (on transect)	Annual Rate of Change	Estimated Population Size
1994	5,737	-	276,000
2002	2,629	6.8% (8 years)	N/A
2007	189	18.6% (5 years)	N/A
2008	148	21.7% (1 year)	N/A
2009	78	47.3% (1 year)	N/A

b) the numbers of calves seen during the surveys in 2008 and 2009 were very low, much lower than what is normally observed on calving grounds of healthy barren-ground caribou herds near the peak of calving.