

August 20, 2025

The Honourable Joanne Thompson
Minister of Fisheries and Oceans
200 Kent St.
Station 15N100
Ottawa Ontario K1A 0E6



Subject: Nunavik Marine Region Wildlife Board Decision regarding changes to the Non-Quota Limitations for Bowhead Whale Harvesting in the Nunavik Marine Region

Dear Honourable Minister Thompson,

In the fall of 2024, the Department of Fisheries and Oceans Canada (DFO) exercised its discretionary powers under section 5.5.22 of the Nunavik Inuit Land Claims Agreement (NILCA) to issue an interim decision modifying certain Non-Quota Limitations (NQLs) established in the 2014 NMRWB-Minister's final decision regarding bowhead whale harvesting in the Nunavik Marine Region (NQL). This interim measure allowed the Quaqtah bowhead hunt to proceed despite DFO being unable to meet specific enforcement-related NQL obligations. While enabling the hunt to continue as planned was supported, other co-management partners and the NMRWB raised concerns regarding the appropriateness of using interim measures when proper Board-Minister decision-making procedures would have been possible, and the more appropriate approach, had there been adequate foresight.

Following a full review of the Minister's interim decision, in accordance with article 5.5.22, the Board emphasized the importance of adherence to the Board-Minister decision-making process as prescribed in the NILCA when establishing or modifying harvesting regulations. Article 5.5.22 and the Minister's discretionary powers therein should only be used in the rare cases of unforeseeable and urgent emergencies. The NMRWB review was held in December of 2024, following a period of comments being afforded co-management partners. As a result of the review, the NMRWB encouraged DFO to engage with co-management partners and to submit a Request for Decision to the Board so that matter could be addressed through the proper NILCA Board/Minister decision making process. In line with this advice, DFO met with representatives from Makivik and Anguvigaq in early 2025 to collaboratively review the 2014 NQLs and to develop modifications to the Bowhead NQLs that could be submitted to the Board and that would address the issues identified during the 2024 Bowhead hunt.

On March 17, 2025, DFO submitted a Request for Decision to the NMRWB accompanied by the proposed modifications. In accordance with Board rules and practice, a written public hearing was launched on April 14, 2025, to provide parties with an opportunity to be heard on the matter.

By the hearing deadline of May 19, 2025, three submissions had been received – from the Anguvigaq, Makivvik and DFO. The Board deliberations were conducted during the Board’s in-camera meeting on June 5, 2025. NILCA-designated observers were present to observe the deliberation and decision making.

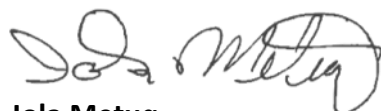
All supporting documents relevant to this Public Hearing are available on the hearing registry found on the NMRWB’s website. (<https://nmrwb.ca/2025nqlsbowheadwhale-hearing/>).

Considering the alignment of the positions presented by DFO, Anguvigaq and Makivvik, and their consensus with respect to the necessary modifications to the NQL’s, the NMRWB resolved to accept and adopt the modifications to the 2014 Bowhead Whale Non-Quota Limitations as submitted in the Request for Decision. The final table of modifications and the Board’s Resolution on the matter are attached for your review and consideration in accordance with 5.5.8 of the NILCA.

In addition to the resolution and the document appended therein, we wish to share with you some reflections that came up through the Written Public Hearing and during Board deliberations. During the deliberations there was discussion around the continued designation of the penthrite grenade as the sole primary killing device for bowhead whale harvesting. It was noted that the *anguvigaq* (or lance)—a hunting weapon used by Inuit hunters—had been identified as a potentially more humane alternative. The Board understands that the complexities of this matter are currently under consideration in parts of Canada where Bowhead hunts occur more regularly. Although at this time there is no interest in modifying the NQL related to the primary killing device, the NMRWB intends to monitor the outcomes of those considerations and remains open to revisiting the Bowhead Whale Non-Quota Limitations in the Nunavik Marine Region should new evidence or consensus emerge in support of recognizing the *anguvigaq* as a primary killing method.

Thank you for your thoughtful participation in and compliance with the NILCA and its decision making processes. We would like to acknowledge the diligent efforts of your departmental staff who continue to provide valuable input in our meetings and hearings as the Board fulfills their mandate under the NILCA.

Sincerely,

A handwritten signature in black ink, appearing to read 'Iola Metuq', written in a cursive style.

Iola Metuq

Chairperson,
Nunavik Marine Region Wildlife Board
P.O. Box 433, Inukjuak, QC, J0M 1M0

Cc. Amy Amos, Regional Director General, DFO Arctic Region
Sylvain Vézina, Directeur général régional,
Michael Hale, Indigenous Fisheries Coordinator, DFO Arctic Region
Patt Hall, Regional Senior Fisheries Management Officer, DFO Arctic Region
Martine Giangioppi, Senior Advisor, Liaison with Nunavik, Eeyou Istchee, and
Mushkegowuk Territory, DFO Arctic Region
Caroline Sauvé, Aquatic Sciences Biologist, DFO Région du Québec

Attachments:

1. Request for decision from DFO.
2. NMRWB Resolution #2025-06-01: Resolution of the NMRWB to approve the proposed amendments to the 2014 Bowhead Whale NQLs as submitted jointly by DFO, Anguvigaq and Makivvik.
3. Appendix A: Proposed and Approved Amendments to Bowhead Whale Non-Quota Limitations

NMRWB Resolution #2025-06-01



Resolution of the NMRWB to modify the 2014 Bowhead Whale Non-Quota Limitations (NQLs)

- WHEREAS** pursuant to Article 5 of the Nunavik Inuit Land Claims Agreement (“**NILCA**”), the Nunavik Marine Region Wildlife Board (“**NMRWB**”) is the main instrument of wildlife management in the Nunavik Marine Region (“**NMR**”), and has the sole authority to establish, modify, or remove Non-Quota Limitations (“**NQL**”) pursuant to NILCA section 5.2.19;
- WHEREAS** Bowhead Whale Non-Quota Limitations were established by the NMRWB, by way of Resolution 2014-03-03, in 2014. The NMRWB decision to establish Bowhead NQLs and the specific NQL’s were duly accepted by the Minister as per article 5.5.8 (a) of the NILCA, and took effect there after.
- WHEREAS** on March 17, 2025, the NMRWB received a joint Request for Decision with a joint proposal from the Anguvigaq, Makivvik Corporation, and the Department of Fisheries and Oceans Canada (“**DFO**”) recommending modification to the 2014 Bowhead Whale NQLs to update the measures to reflect operational realities, modern regulatory language, and evolving community governance;
- WHEREAS** the NMRWB reviewed the proposed changes and concluded that the proposed modifications are consistent with the NILCA. They represent effective and collaborative approaches to Bowhead management, grounded in Inuit knowledge and best practices, and meet conservation and safety objective, while also ensuring Nunavik Inuit continue to fully enjoy and exercise their harvesting rights;

THEREFORE, BE IT RESOLVED :

- THAT** the preamble to this resolution and the document titled “**Appendix A: Proposed and Accepted Amendments to the 2014 Bowhead Whale Non-Quota Limitations**” (attached separately) are an integral part of this decision and the details there reflect the changes effected by this resolution;
- THAT** the NMRWB, after due consideration and in accordance with the terms of the NILCA, accepts and adopts the proposed modifications to the Bowhead Whale Non-Quota Limitations as outlined in Appendix A to this resolution;
- THAT** this initial decision of the NMRWB to modify the Bowhead Non-Quota Limitations shall be forwarded to the Minister of Fisheries and Oceans Canada for consideration in accordance with NILCA section 5.5.7;

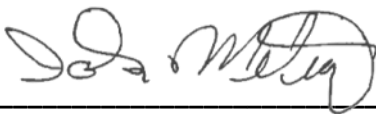
IN WITNESS WHEREOF the foregoing resolution to modify the 2014 Bowhead Whale Non-Quota Limitations has been reviewed by members of the NMRWB and voted upon as follows:

Moved by: Paulu Palliser

Seconded by: Jean-Pierre Savard

In favour: 4 (1 written vote) **Abstain:** 0 **Opposed:** 0 **Absent:** 2 **Vacant:** 0

Date of adoption: June 05, 2025.



Chairperson, Iola Metuq