



this closure are mixed. Some are not affected as much by the closure, especially in western areas where the migration is already mostly completed, while others are impacted more.

- Due to the differences between regions, the RNUK recommends that there is not a single closure applied across the whole area.
- If the closure was to remain in place after this hearing, there should be a protocol to allow for a fast-track interim decision to be made if the RNUK or LNUKs request an extension on the opening. For example, if the belugas have not passed by Quaqtaq by the end of November, the LNUK should be allowed to use this option.

**3. If the closure were in place, and during December or January beluga are found by hunters in an ice entrapment, would it be reasonable and possible for hunters to submit an application to DFO to harvest those whales?**

- We, the RNUK, do not believe that it is reasonable to submit an application to DFO to harvest whales that are entrapped in ice. The decision to allow harvest of entrapped beluga should instead be made at a local level.
- First of all, our experience with DFO approvals is that the bureaucracy involved can be a challenge and the process usually takes longer than expected. Getting the right signatures and approvals would likely not be fast enough, especially with delays due to unforeseeable factors such as signing authorities being out of office. Communicating the decision is also a challenge, and it is difficult to convince harvesters to continue to wait for an email if they know that belugas will not survive in the ice if they wait too long.
- Secondly, DFO decision makers do not have the full understanding needed to make those decisions. Inuit knowledge holders understand the environmental conditions that would lead to belugas escaping their entrapment or dying there. For example, if the ice is thin and there is a large tide coming, they might be able to break free. However, if the ice is gaining an inch per day, they will likely not survive. DFO does not account for these factors and cannot properly assess the situation, so this kind of decision should be made at a more local level with advice from elders and the LNUK who are familiar with the currents, wind, and ice movements.

Questions from DFO:

**1. What progress have the Hudson Strait LNUKS made to finalize local hunting rules, and will they be implemented in 2022?**

- The RNUK met with the Hudson Strait LNUKs in June 2021 to discuss local hunting by-laws and encourage the consultation and by-law creation processes. Ivujivik and Quaqtaq created their by-laws after that meeting, in 2021. Kangiqsujuaq created their by-laws this year and is currently drafting the resolution to accompany it. All three are working on implementing these by-laws in their communities in 2022. The RNUK is giving support to Salluit to encourage them to complete their by-laws in the coming months.

**2. Will the Hudson Strait communities participate with DFO to update our collective understanding of EHB seasonal migration patterns? The objective of this research would be to develop improved management measures from both knowledge streams (IQ and science).**

- This question is too vague to be able to provide a proper answer. Of course, the RNUK and LNUKs are willing to participate in research on belugas if it is done respectfully and with Inuit leadership. There is often reluctance from Inuit when it comes to management and research projects from DFO because of the abrupt introduction of the quota system and closures in the 1980s without proper Inuit consultation. The LNUKs and RNUK cannot blindly agree to the research project described above without more details and an understanding of potential outcomes and impacts. Inuit knowledge is important to consider in responding to these questions but researchers frequently take the wrong approach in obtaining this information. We would need to understand the methodology and approaches that will be employed and we urge DFO to defer to NMRWB, an organization that is better placed to pursue collaborative research especially when it involves Inuit Knowledge.

**3. What specific measures will the Hudson Strait LNUKs / RNUK adopt if the Hudson Strait winter closure is modified or withdrawn, to provide the NMRWB with continued confidence that by 2026 the EHB beluga stock can be rebuilt to levels observed in 2016?**

- The RNUK does not believe that the implementation of the winter closure protects the EHB stock in the first place. In fact, we believe that it can be *damaging* to the conservation of the EHB stock and that its removal would benefit efforts to rebuild the EHB stock. In the beluga management plan hearings, it was clear from Inuit Knowledge that the EHB belugas pass the Hudson Strait earlier in the fall. The abrupt addition of a winter closure upset some of the deliberate plans to protect the EHB stock which were arranged during the hearing. The opening of the hunt in November was meant to be decided by the LNUKs and potentially delayed if the EHB stock was still migrating through. It is unlikely that the local hunters would delay the opening of the hunt in their community if the harvest period is already cut very short (due to the winter closure). In addition, the LNUKs are making efforts to create by-laws to encourage hunters to be selective about which belugas they harvest. This is difficult to implement when harvesters are rushing to capture the first belugas that they see due to a short harvest period and looming closure. And of course, the belugas that they see earlier in the fall are more likely to be EHB belugas than those that they would see if they waited.
- So, the question should not be *what specific measures will the Hudson Strait LNUKs / RNUK adopt if the Hudson Strait winter closure is modified or withdrawn, to provide the NMRWB with continued confidence that the EHB beluga stock can be rebuilt?* That question makes it sound like we will need to offset the damage caused to the EHB stock due to the removal of the closure, when in fact the removal of the closure will itself help with the conservation goals that DFO is envisioning.
- With or without the closure, the RNUK will continue with the action items that we are already working on, including supporting the LNUKs in creating and

implementing local by-laws, encouraging sampling efforts, training the LNUK managers in sampling, and communicating with Nunavimmiut about respecting Inuit knowledge and harvesting sustainably for the next generations. The winter closure presence does not increase the EHB beluga stock, it only infringes on the rights of Inuit to hunt.

Thank you for considering our responses in ongoing discussions about the future of this management plan,

A handwritten signature in black ink, appearing to read 'James May', with a stylized, cursive script.

James May  
*RNUK President*