

beluga. It is clear from the evidence that was presented that the boundary, as currently defined, is not well rationalized by any of the sources of information. Inukjuak was very clear that their area is not a summering area and is part of the migration routes of multiple groups of beluga. Additionally, the combined results of DFO's aerial surveys show that greater than 99% of the sighting of beluga during the surveys are further south than Inukjuak, even though the survey extends much further north of Inukjuak. In the limited satellite telemetry data that is available, a single beluga was shown to go just north of beluga during the summer. It is to be expected that there will be some EHB beluga around Inukjuak at nearly all parts of the year, including summer, just like there is nearly everywhere else in Nunavik which is factored into the monitoring plan of the management system. Hunters in Hudson Strait also speak about beluga that are 'left behind' during the migration and come and go throughout the summer.

The EHB Arc zone is an area where 100% of the beluga are considered to be EHB. In addition to Inuit knowledge from Inukjuak, the satellite tagging and genetic results also show that there are mixed beluga migrating through Inukjuak. Based on all of this evidence, it is clear to the Anguvigaq that the Inukjuak can no longer be assumed to be part of the summering range of EHB beluga and the associated assumption, where 100% of the harvest is assumed to be EHB beluga, is not valid. Furthermore, Inukjuak has shown their willingness to bring in additional measures beyond what is in place in the other Northeastern Hudson Bay communities, Puvirnituk and Akulivik. They are offering to also implement a voluntary closure area, the same as the one implemented by Sanikiluaq since 2005/2006, which has been endorsed by DFO despite being directly located in the summering range.

Moreover, Anguvigaq maintains that a change in the location of the boundary will result in either no change in overall EHB pressure or may actually reduce the total harvest of EHB since Inukjuak is currently receiving beluga from other communities with access to beluga with a similar stock composition to meet their needs.

Beluga management in Nunavik has historically been dominated by top-down conservation approaches based on western science. From a western science perspective this may seem to be the more effective approach to sustaining wildlife populations; however, it removes a sense of stewardship and consequently buy-in from communities, which generally leads to its failure. Furthermore, it detracts from Inuit approaches to wildlife management which have sustained wildlife since time immemorial. Since the EHB Beluga population has not been revitalized after many decades of this top-down management approach in the EHB Arc region, we believe that it is time to re-evaluate the status quo. Inukjuak has faced many restrictive management measures that have bound them to harvest practices which do not align with traditional values. In this context, Inuit management bodies and community leaders are reluctant to create additional restrictions which would further impact their family's livelihoods, safety, and food security. However, Inukjuamiut have expressed a desire and commitment to take more active leadership in beluga management again should restrictions be loosened, including implementation of a voluntary summer closure, close collaboration with co-management partners, community discussions about culturally appropriate beluga management, and development of their beluga harvest by-laws. They have already been hosting radio discussions with the community and receiving input from elders and knowledge holders on appropriate and sustainable harvest practices which should govern community hunts. This approach is effective for our beluga conservation goals due to improved communication (from peers rather than strangers), increased compliance with culturally-relevant decisions, and an overall sense of stewardship and self-determination in management.

Although beluga is central to this decision, this management decision is also about people. Inukjuak has borne the greatest burden of beluga management decisions over the past 40 years - they have literally lost community members over the restrictions that have been put in place. And although the intention is to move towards community-led management, this is nearly impossible within the confines of such heavy imposed restrictions. We believe that the time has come for Inuit to be the main solution for improving the beluga population, rather than the status quo of accepting that DFO provides the only solution. We stand behind

our recommended new line location as being both beneficial for beluga and for Inuit and hope that the NMRWB will recognize the bright possibility of Inuit stewardship for the future of beluga management in this area.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Palliser', with a stylized flourish at the end.

Billy Palliser
Vice President, Anguvigaq (RNUK)