



MAKIVIK CORPORATION

Public hearing to consider modifying the northernmost boundary of the current Eastern Hudson Bay arc region seasonal total allowable take.

Submission to the Nunavik Marine Region Wildlife Board

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www.makivvik.ca

○ Head Office • Siège Social
C.P. 179
Kuujuaq QC J0M 1C0
Tél. (819) 964-2925
Fax (819) 964-2613

○ Montréal
1111, boul. D^r Frederik-Philips 3^e étage
St-Laurent QC H4M 2X6
Tél. (514) 745-8880
Fax (514) 745-3700

○ Québec
580, Grande-Allée E.
Suite 350
Québec QC G1R 2K2
Tél. (418) 522.2224

○ Ottawa
75 Albert St
Suite 1006
Ottawa ON K1P 5E5
Tél. (613) 234-5530

Introduction

Makivik Corporation (hereafter referred to as Makivvik) wishes to express its opinion to the Nunavik Marine Region Wildlife Board (NMRWB) on the northernmost boundary of the current Eastern Hudson Bay (EHB) arc region seasonal total allowable take in the hope that these comments will contribute to the improvement of the current beluga management system to promote the harvesting rights of Nunavik Inuit while giving full consideration to the principle of conservation for the beluga populations in the Nunavik Marine Region (NMR).

Considerations

Beluga management in the Nunavik Marine Region (NMR) has evolved significantly in the past years, slowly moving from an imposed quota system towards a more Inuit-led beluga management plan that is meant to empower Inuit to manage their resource while meeting the conservation concerns for the Eastern Hudson Bay (EHB) beluga population. Makivvik believes that the Anguvigaq request for decision to consider modifying the northernmost boundary of the current EHB arc region is aligned with that shift in the management system, as the information leading to that request for decision comes from their project *Nunavik Inuit Knowledge of Eastern Hudson Bay Beluga*. The Inuit knowledge gathered during that study indicates that the beluga in the vicinity of Inukjuak are migrating in mixed groups and that this area is not, in fact, a summering area. This information led to questioning the actual management zones, especially the EHB arc region.

Management zones should reflect the biology and distribution of the species and, by consequence, dictate the management measures in said zones. In this specific case, it is Makivvik's understanding that the EHB arc region is the summering area of the EHB population. This area is therefore not a migration route which is the case for the Northeastern Hudson Bay (NEHB) region. The management system is therefore adapted to this reality with very restrictive measures in the summering area, including a total allowable take, as the population is assumed to be, for the vast majority, EHB beluga.

Management zones are the foundation of a management system, but it is a challenging task to draw lines when it comes to wildlife migration, distribution and behavior. Important information has been shared during this public hearing, but a lot of this information was centered around the conservation objectives and the potential impacts of moving the boundary on the EHB population. While we recognize the importance of considering the impacts of a management decision, we believe that in this case, it should be considered as a next step.

Indeed, the Department of Fisheries and Ocean (DFO) provided information on EHB and on the Western Hudson Bay (WHB) beluga migration and distribution based on previous aerial survey results and satellite trackers but we believe there is no strong evidence supporting that the area between the current boundary and the proposed boundary is the EHB summering habitat. Yet, DFO still concludes that:

“Considering the estimated downward trend in the BEL-EHB beluga stock and the consistent surpassing of target harvest levels since its implementation in 2021, any modification to the

management plan that may result in an increase in the BEL-EHB harvests would be considered risky for a conservation and to maintain a sustainable harvest of the population.”

It seems that once again, the precautionary principle is used against Nunavik Inuit to try and justify a management measure that is not rooted in strong Inuit knowledge nor western science.

It is of the upmost importance for Makivvik that this decision is made with fairness to all communities and that no “management shortcuts” are taken in an attempt to reduce the overall harvest. If there is no clear evidence that the area around Inukjuak is significantly different from the communities in the NEHB, then they should not bear the weight of a TAT simply because including them in the TAT is believed by DFO to help reduce the overall harvest of EHB beluga.

The harvest levels and the effectiveness of the management measures are questions that should be discussed when renewing the management plan, not when discussing the location of the summering habitat of the EHB population. In fact, broader discussion about the summering area will be needed when renewing the management plan as the new genetic reanalysis conducted by DFO indicates that the summering area of the BEL-EHB stock goes beyond the limits of the NMR.

Recommendation

Considering that the actual boundary is not supported by Inuit knowledge or by reliable western science and given that it was decided unilaterally without consulting Inuit, it is recommended that the boundary be moved to the location proposed by the Anguvigaq (57.78396, -78.61985 to 58.34808, -77.98643) which is supported by Inuit knowledge.

Conclusion

Makivvik would like to thank the NMRWB for conducting this public hearing which we hope will lead to the modification of the northernmost boundary of the EHB arc region. This is an opportunity to review an important aspect of the management system on which we will build in the coming years for future decisions including the revision of the management plan in 2026. It is also the appropriate way to uphold the principles and objectives of the Nunavik Inuit Land Claims Agreement which call for an effective system of wildlife management that respects Nunavik Inuit harvesting rights, an effective management role for Nunavimmiut in all aspects of wildlife management, and the appropriate recognition and integration of Inuit knowledge of wildlife and wildlife habitat alongside western science. The precautionary principle and the fear of potential short-term consequences should not be guiding this important decision that has affected Nunavik Inuit, especially Inukjuamiut, for too long. Makivvik trusts that communities and co-management partners can work together to protect the EHB population. The voluntary ban proposed by the community of Inukjuak is a good example that when given the opportunity, Nunavik Inuit are able and willing to take action to manage their resources.