MAKIVVIK

Public Hearing:
Beluga Management System Extension

Written submission to the Nunavik Marine Region Wildlife Board and the Eeyou Marine Region Wildlife Board

May 2025

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Introduction

Makivvik wishes to provide comments to the Nunavik Marine Region Wildlife Board (NMRWB) and the Eeyou Marine Wildlife Board (EMRWB) regarding the issue put through this public hearing of whether to approve the request of the Anguvigaq to extend the current Beluga Management System by one year, until January 31, 2027, in the hope that it helps support the NMRWB and the EMRWB's decision-making process.

Considerations

As the Boards are aware, a lot of new significant scientific information was made available or is expected to be made available over the recent and remaining implementation course of the beluga management system, respectively. Starting in 2022, a Department of Fisheries and Ocean (DFO) genetic reanalysis reaffirmed the existence of four populations (WHB, EHB, JAM, Cumberland Sound) while also distinguishing a new population in the Belcher Islands (BEL). In addition to the genetic component, a survey was conducted in the summer of 2024 and results are yet to be published. Same goes for the population dynamics model that is being updated by DFO and for which we are still awaiting official publication.

Given that these results could have profound implications on the current management system, Makivvik strongly believes that the appropriate time should be granted to co-management partners to fully review, understand and discuss those results outside of the various inevitable pressures of a hearing process. The beluga working group, composed of Makivvik, DFO and the Anguvigaq, is the right platform to have these essential conversations.

Further, the genetic reanalysis suggests that the conversation about beluga management must be done in collaboration with other jurisdictions since the BEL-EHB is a shared stock between Nunavik and Nunavut Inuit. While the information has been presented to Nunavik co-management partners in 2022, The Nunavut Wildlife Management Board (NMWB) has received the information only recently, on February 26, 2025. To our knowledge, no request for decision has been made to the NWMB as of now. We fear that without a management system extension, the coordination and collaboration between jurisdictions is at jeopardy which poses the risk not only to implement an ineffective management system but also to unduly impact Nunavik Inuit rights by having Nunavimmiut bear the costs of conservation alone.

In addition to scientific information, the Boards must equally consider Inuit knowledge. The Anguvigaq requested a delay in order to provide the Boards with the best available Inuit knowledge to inform the next iteration of the beluga management plan. Makivvik would like to remind the Boards that no implementation funding came with the last management plan and yet, the Anguvigaq and Makivvik had responsibilities, to inform and educate the communities on the management plan, work on bylaws and ensure that the Inuit knowledge is kept up to date as we would expect for all information provided to the Boards for the decision-making process. We therefore recognize and praise the work done by the Anguvigaq to secure funding and conduct such

an extensive Inuit knowledge project and we can only hope that the Boards will allow the extension of the plan to allow them to finalize this important work.

At the onset of the previous management plan, the Boards expressed a strong will for increased communication and collaboration amongst co-management partners indicating that they should work to "jointly to develop a full understanding of the status of the population and to establish a shared understanding of what measures and plans are required for the restoration and revitalization of this population"[1]. Without sufficient time to analyse upcoming science and to ensure the consideration and gathering of Inuit knowledge, the achievement of a shared understanding before the new management plan seems impossible.

Makivvik deems it appropriate that proper consideration and time be allocated on the analysis of the current management plan. It is necessary to evaluate the different management measures and evaluate whether they achieved the intended results before initiating discussions on new management measures. This work has been initiated by the beluga working group but has not been completed yet.

We believe that the requested extension would allow co-management partners to complete their information gathering, properly involve relevant jurisdictions and work together towards a common understanding of the current state of the populations in the NMR and avenues to manage belugas in a culturally appropriate way. Our hope is that common grounds can be found and then be shared with the Boards during the decision-making process for the next management plan.

The Boards, in their public hearing notice, asked what alternatives are suggested to ensure beluga populations and Cree/Inuit harvesting rights are protected past January 31, 2026, if the current beluga management system is not extended by 1 year. This is an important question to address. We believe that an incomplete Inuit knowledge study combined with a limited understanding of the new scientific information cannot lead to the development of a plan that is coherent from a wildlife management standpoint and that all parties will believe in and support. The consideration of the new scientific information without the inclusion of the most up to date Inuit Knowledge would create an imbalance between the two-knowledge system that would be very difficult for the Boards to reconcile in a new management plan. Should the current plan not be extended as per the Anguvigaq's request, Makivvik believes that the measures adopted past its expiry must be temporary in nature, until such time as co-management partners have had the necessary time to integrate the new information and develop a comprehensive plan. However, our concern is that it would be extremely challenging to communicate effectively these new temporary measures while working on developing the plan.

Nunavik Marine Region Wildlife Board and Eeyou Marine Region Wildlife Board, Reasons for Final Decisions in relations to the Resolutions for the establishment of a Total Allowable Take for Beluga in the Eastern Hudson Bay Arc Region and Associated Non-Quota Limitations for Beluga in the Nunavik Marine Region (2020-2026)

Any new measures (whether they be part of an extended plan or not) need to account for the time required to communicate with communities and ensure appropriate understanding and therefore implementation of the plan. This is a lesson learned from the current plan: implementation issues arose from the time it took for co-management partners and communities to understand and get used to the plan. In this sense, interim measures that are substantially different from the current plan but don't benefit from sufficient community preparation have little chance of being successfully implemented.

Makivvik recognizes that the preliminary results from the survey and population dynamic models suggest a decline of the BEL-EHB stock and is very much looking forward to reviewing the science, the Anguvigaq's beluga Inuit Knowledge project and to discuss with communities and knowledge holders on this matter. We believe it will be important to monitor the threshold closely throughout the harvest season and use the appropriate management tools if concerns are raised. We suggest that a meeting between co-management partners be organized after the upcoming spring migration to monitor the harvest numbers and, if needed, discuss management adjustments moving forward into the remainder of the year.

Recommendation and Conclusion

Makivvik would like to thank the NMRWB and the EMRWB for considering our comments regarding the request of the Anguvigaq to extend the current Beluga Management System by one year, until January 31, 2027**.** Beluga management in Nunavik is a sensitive subject, and its history is marked by colonialism and poor decision-making that is now weighing on our collective shoulders. Building mutual trust and understanding must be at the heart of our actions. Makivvik recognizes that there may be a certain level of risk in extending the current plan, but this risk does not supersede the costs of rushing decisions without Inuit knowledge involvement and the potential for co-development that this extension would grant all co-management partners. For these reasons, Makivvik believes the request for an extension should be accepted by the Boards.