



MAKIVVIK

**Public Hearing:
Amendments to the NQLs for Bowhead Whales**

**Written submission to the Nunavik Marine Region
Wildlife Board**

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Introduction

Makivvik wishes to provide comments to the Nunavik Marine Region Wildlife Board (NMRWB) on the suggested modifications to the 2014 Non-Quota Limitations (NQLs) for Bowhead Whale Harvest, in the hope to contribute to the board final decision on this matter. We also wish to provide an additional recommendation related to the trigger of the Interim Decisions section of the NILCA which acted as a precursor to the present hearings.

Considerations

Makivvik has no objection with the NQL amendments put forward in this hearing and we wish to thank the Anguvigaq and the Department of Fisheries and Oceans (DFO) for collectively reviewing and proposing amendments to the NQLs.

That said, we take this opportunity to raise our concerns with regards to the issue encountered as part of the 2024 bowhead whale hunt and more specifically the use of the Interim Decisions section of the NILCA by the Arctic Region Regional Director General of DFO.

As put forward by Makivvik to the Board during its December 3-5, 2024 regular meeting, we do not believe the use of such section of the NILCA (5.5.22) was appropriate: DFO should have notified the Board as soon as their ability to implement part of the NQLs changed. They should have then requested NQL amendments through regular Board decision, rather than shortly before a planned hunt, which caused an artificial sense of urgency. Generally, co-management partners should notify the Board as soon as possible when becoming aware of a potential need to amend the management measures in place, and the Interim Decisions section cannot be used by DFO as a way to circumvent the Board's decision-making process in lieu of such diligent and ongoing tracking.

In order for management measures to be tracked and modified in a timely manner as may be needed, we believe it is essential that the NMRWB's decisions be made more easily available to the public. We made this comment as part of the Board's communications strategy survey which took place in June 2024 and wish to reiterate how such access is essential for efficient communication and for an effective system of wildlife co-management as commended by the NILCA. This is particularly true when preparing to take a decision associated with a specific specie (whether that decision be through a regular Board meeting or through a public hearing process). Further, it would help support the NILCA's objective of providing for public participation and promoting public confidence in wildlife management, particularly amongst Nunavik Inuit.

Conclusion

We recommend that (i) the proposed NQL amendments be approved as is; and (ii) the NMRWB management decisions be made easily available to the public.