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Ernie Campbell, Deputy Minister
Department of Environment and Natural Resources
Government of the Northwest Territories
Ernie_Campbell@gov.nt.ca

Delivered via email

January 18, 2016

RE: Information requests - Bluenose East Caribou Management Proposal

Dear Mr. Campbell:

The ʔehdzo Got'ıne Gots'ę Nákedı (Sahtú Renewable Resources Board) thanks the Department of Environment and Natural Resources for the Bluenose East Caribou (BNE) Management Proposal dated December 15, 2015. Below is a first round of Information Requests from the related to the proposal.

1. Aboriginal Consultation

Please provide copies of the meeting summaries for the five meetings with Aboriginal leaders and technical meetings referred to on page 4, including tracking of ENR responses to Aboriginal inputs.

2. Herd Definition

ENR's management proposal assumes that the BNE and Bluenose West (BNW) caribou that travel through the Sahtú Region are distinct populations and thus separate management units. This is consistent with the distinction made in the *Taking Care of Caribou* plan. The plan's technical companion report cites Nagy et al (2005), noting "The use of different seasonal ranges throughout each year and especially of different calving grounds led to the designation of these caribou as three herds: the Cape Bathurst, Bluenose-West and Bluenose-East caribou herds." However, the plan also recognizes that defining caribou herds and exchange or movement between herds are "hot topics" (ACCWM 17 and 26). The technical report recognizes that overlap in areas outside calving grounds is an issue in defining herds by calving grounds. Genetic evidence indicates lack of differences among barren-ground caribou in the Sahtú Region, and some literature recommends managing "metapopulations." This reflects views often expressed in the Sahtú Region, where a single Dene term is used for all barren-ground

caribou. Please provide any available information about risks and benefits of managing BNE and BNW caribou as a single population.

3. Harvest Management Impacts

The Sahtú Dene and Métis Comprehensive Land Claim Agreement provides for limitation of aboriginal harvest if there is a conservation concern. Limiting aboriginal subsistence harvest is also envisioned in the *Taking Care of Caribou* plan when the herds are in the orange or red zones. However, harvesting and harvest monitoring are recognized as a “hot topic” in the plan (ACCWM 33).

- a) Please provide recent evidence of the benefits of harvest restrictions in caribou management.
- b) Please provide a projection for how long it would take the BNE herd to recover to the highest count under the harvest numbers currently proposed, assuming for heuristic purposes that all other factors remain relatively constant (e.g., predation, habitat condition).

4. Proposal for Bull-Only Harvest

ENR recommends a 100% bull harvest (page 5). Cow versus bull harvests is identified as a “hot topic” in the *Taking Care of Caribou* plan (ACCWM 49), and has been much discussed in the Sahtú Region. The “Orange Zone” harvest actions in *Taking Care of Caribou* recommend a majority-bulls harvest. Please provide information about known or anticipated risks and benefits of a bull-only harvest.

5. Evidence of Underreporting of Harvesting

ENR notes that reported BNE harvests were about 2,700 caribou/year in the winters of 2009 to 2013 but that ENR estimates “true” harvest to have been at least 4,000/year.

- a) Please provide more information about the basis for the 4,000/year estimate of the “true” harvest rate for BNE.
- b) Please provide evidence of known situations of under-reporting of BNE harvests in the past three winters.

6. Basis for Suggested Allocation

The proposal indicates that an appropriate allocation was determined by ENR for BNE for 2014/2015, based in part on document harvest “but also on several other criteria including access to other caribou” (page 4).

- a) With respect to the 2014/2015, please provide more detail about the grounds used by ENR to determine the allocation for the harvest in 2014/15 and specifically the other criteria used by ENR to arrive at allocation numbers.

b) ENR proposes an allocation formula for the next three years (page 5) “based primarily on recent harvest information.” Please advise what other factors specifically, if any, were used to determine the proposed allocation level.

7. Habitat Changes and Other Environmental Factors

Traditional harvesters are reporting significant changes to caribou habitat. This may be leading to a decline in the total amount of habitat available for BNE caribou overall. In its proposal, ENR mentions environmental factors known to affect the condition of the caribou and indicates that adverse environmental conditions likely contributed to the BNE’s recent decline. The technical companion to the *Taking Care of Caribou* plan notes that relatively little research has been done on the habitat of the Bluenose caribou herds.

a) Please provide information about habitat protection initiatives that ENR is considering to address these factors.

b) Traditional harvesters have been providing oral evidence to the Board of uncontrolled forest fires of a geographic scope and intensity not previously encountered according to traditional knowledge, and have raised concerns about the impacts of these fires on caribou habitat. Please advise on studies of, and plans for, fire control in caribou habitat areas in the BNE range area.

c) Please provide details regarding the workshop in Nunavut in November 2015, in which ENR participated, focused on protection of caribou habitat, including any workshop outcomes and suggestions for alternatives for habitat protection.

d) Please provide information about relevant plans for climate change responses that ENR and the GNWT are considering as part of a caribou habitat protection plans.

e) Please provide an overview of current research initiatives on changes in available BNE habitat and modelling of sustainable populations for the available habitat.

f) Please provide information, including any preliminary information, from D. Russell’s review of environmental trend data linked to trends in caribou herd declines (referred to on page 10-11).

g) Please provide additional information about how ENR specifically proposes to support increased research into “underlying changes in herd abundance” (page 11).

8. Proposal for Sustained or Increased Collar Use

ENR recommends using 50 collars on BNE caribou, and provides a copy of the technical rationale used by ENR to propose an increase in the number of collars used for Bathurst caribou. ENR also proposes that an increase in number of collars would lead to greater certainty in understanding trends in herd size, movement and condition. In order to better conduct a

“need for and alternative to” analysis regarding the need to increase or keep existing collar numbers, please provide

a) Information on known risks and harms that arise from the use of collars on caribou, including statistics related to mortality, condition of collared caribou, and other impacts.

b) Information on whether and what alternatives are being considered, in addition to or instead of collars, which could achieve the goals of understanding herd range, movement and overall condition.

c) Information on steps being taken to address concerns raised by Aboriginal harvesters in the Sahtú (and across Canada) about the use of collars on caribou.

d) More information on the “geo-fencing” study process referred to on page 9.

Máhsí cho,

A handwritten signature in blue ink, appearing to read "Michael Neyelle", with a stylized flourish at the end.

Michael Neyelle, Chair