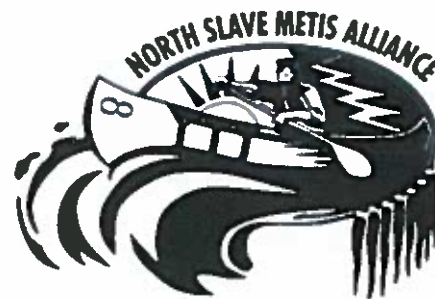


NORTH SLAVE MÉTIS ALLIANCE

PO Box 2301 Yellowknife, NT X1A 2P7



Jonas Lafferty, Interim Chairperson
Wekeezhii Renewable Resources Board
POBOX 67 Wekweeti NT X0E 1W0
P: 867-713-2333
F: 867-713-2334

March 14, 2016

RE: Final Written Arguments – Bathurst Caribou Herd Joint Management Proposal

Dear Mr. Lafferty,

The North Slave Métis Alliance ("NSMA") reviewed the project titled "Government of the Northwest Territories and Tlicho Government Joint Proposal on Caribou Management Actions for the Bathurst herd: 2016-2019" ("the Proposal"), and related materials posted on the Public Registry of the Wekeezhii Renewable Resources Board.

The NSMA respectfully submits our Final Written Arguments respecting the Proposal. NSMA appreciates the opportunity to participate in this process.

Should you have any questions please do not hesitate to contact the undersigned.

Sincerely,

Shin Shiga
Regulatory Analyst
North Slave Métis Alliance
shin.shiga@nsma.net
(867) 447-0684

The North Slave Métis Alliance Final Written Arguments

Background

The North Slave Métis Alliance ("NSMA") members have a good *prima facie* claim to the Aboriginal right to harvest caribou north of Great Slave Lake, NWT. The proposed Bathurst Caribou management plan (the "Management Plan") has direct effect on the NSMA members' ability to exercise their Aboriginal rights, now and in the future.

It is also NSMA's mandate to exercise Métis responsibility to protect the environment, including wildlife.

The NSMA participates in this proceeding to ensure that the proposed Management Plan is compatible with NSMA's values, and to protect NSMA members' Aboriginal right to harvest caribou.

General Remark

The NSMA, in principle, is supportive of the four key components in the proposed management plan. These are:

1. Temporary harvest ban;
2. Increased community outreach and education;
3. Increased caribou and predator monitoring; and
4. Predator management.

This general conclusion has not changed as a result of the Public Hearing held in Yellowknife from February 23-24, 2016.

Temporary Harvest Restriction

The NSMA understands that the Bathurst Caribou population is in a perilous state, for reasons not yet clearly known.

Harvesting from a herd in such a state, scientifically and culturally, is not viable for NSMA members.

For these reasons, NSMA supports the temporary Bathurst Caribou harvest restriction to 0 ("zero") animals by all Aboriginal harvesters.

NSMA will continue to support zero harvest as long as the responsibility is shared fairly and equitably by all Aboriginal people who traditionally harvest from Bathurst Caribou.

However, NSMA questions whether the lack of leadership and actions by the GNWT is in part responsible for this drastic measure, which is adversely impacting the Aboriginal rights of NSMA members.

The recent Report of Environmental Assessment on Jay Project by the Mackenzie Valley Environmental Impact Review Board also comments that the ENR has been over-due to roll out a long-term Bathurst Caribou management mechanism.

As a result, many important Bathurst Caribou migration corridors and habitats are lost to development.

NSMA would like to reiterate our strong support for expediently establishing a collaborative long-term management mechanism for Bathurst Caribou.

Increased Community Outreach and Education

NSMA supports more and better education and outreach to caribou harvesters, Aboriginal and non-Aboriginal.

Education programs should also target school systems, in order to teach the youths early-on to be responsible users of the land.

However, per NSMA's response to Information Request Round 2 #26, unlike other Aboriginal Organizations, NSMA does not receive any core funding.

Lack of resources makes it challenging to carry out these activities, however willing we are.

Increased Caribou and Predator Monitoring

NSMA supports more and better monitoring programs to improve the management responses.

As with our concerns with the long-term management, some of the monitoring questions, such as standardized behavioral monitoring protocols and zone of influence, have been on the "to-do list" for many years.

NSMA hopes that ENR will use the resources wisely, and answer some of the key outstanding monitoring questions to help recover the herd.

Predator Management

Aggressive predator control is a difficult management response for the NSMA to support, due to cultural values, ecological impacts, and economic effectiveness.

NSMA has not had sufficient time and resources to consult this issue with the members.

NSMA is open to considering various predator management options suggested in the proposed Management Plan.

However, as it is expressed in the proposal, careful analysis and deliberation will be required before NSMA will support any drastic predator control measures.

Closing Remark

In closing, the NSMA would like to acknowledge and appreciate the hard work all stakeholders put into this process.

NSMA would like to take this opportunity to reiterate that, as an Aboriginal organization with limited capacity, NSMA finds it extremely difficult to meaningfully participate in large regulatory processes. This process with Wekeezhii Renewable Resources Board has been no exception to this rule.

The NSMA, unlike other Aboriginal governments and organizations, does not receive core funding to participate in the regulatory processes. In particular, processes in short notices are difficult to manage with the organization with one technical staff, at the end of the year when all consultants are busy.

It would also be much fairer and preferable, had the two Proponents, the GNWT ENR and Tlicho Government, worked with the NSMA early-on in the stage of the Management Plan development. As a body representing Métis people, we view that a collaborative wildlife management should take such approach.