



July 11, 2014

Hon. Michael Miltenberger
Environment and Natural Resources
Government of the Northwest Territories
Box 1320
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Via Email

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Grand Chief Eddie Erasmus
Tłıchq Government
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Re: Joint Proposal on Caribou Management Actions in Wek'èezhii: 2014 – 2019

The Wek'èezhii Renewable Resources Board (WRRB) acknowledges receipt of the above-captioned proposal by email on June 30, 2014 together with a Tłıchq Government (TG) letter dated June 24, 2014 and a Government of the Northwest Territories (GNWT) letter that is undated. The Board also received a powerpoint presentation from Kerri Garner (TG) on July 3, 2014, with participation from Bruno Croft (GNWT), and wishes to express its appreciation for the presentation and subsequent question and answer session.

The Board understands that TG has completed its consultation on the joint proposal, and that a consultation report will be provided by TG by July 15, 2014. The Board also understands that GNWT will be conducting community consultation on the joint proposal over the summer and will be providing a consultation report following completion of its consultation, likely in early September. At this time, the Board considers this management proposal to be incomplete, pending receipt of the two consultation reports.

Once the Board deems the proposal complete it will determine the level of review required and the process and timeline for review according to the WRRB Rule for Management Proposals (Rule). While the Board has started a preliminary review of the joint proposal document submitted, the formal review period will not start until the proposal is complete. As stated in the Rule, the minimum review period for a Level 1 proposal is 30 days, a Level 2 proposal is 90 days and a Level 3 proposal is up to one year.

The Board's next meeting is tentatively scheduled for the week of October 6. We encourage TG and GNWT to provide their consultation reports as soon as reasonably possible, and remind both governments that the Board will not consider any management proposal submissions received within two weeks of a meeting (see Rule). We note that the joint proposal was received two days before the July 2-4 Board meeting, which is not in compliance with the Rule.

The Board draws your attention to the following points:

1) Timing

The WRRB first requested a new joint management proposal for the Bathurst caribou in response to the 2012 Bathurst caribou surveys in a letter dated June 27, 2012. On March 6, 2013, ENR and TG responded proposing to provide a joint proposal by May 1, 2013. On May 6, 2013 ENR and TG updated the Board, stating that the joint proposal was not ready and would be provided as soon as possible after September 16, 2013. As stated, the WRRB received the proposal on June 30, 2014, more than two years after it was first requested, and more than a year after the previous proposal's term was over. We are disappointed at the length of time that has been required to develop this joint proposal and encourage both governments to improve the process in advance of the need for future proposals.

2) 2014-15 Harvest Season

Following on the Board's observation about the length of time required to develop the 2014-19 joint proposal, and the current timelines for submission of the consultation reports, it will not be possible for the Board to make recommendations (and for the governments to review and respond) before the start of the 2014-15 harvest season. To ensure a consistent management approach the Interim Bathurst Caribou Management Recommendations that were in place during 2013-14 should continue in 2014-15 until the review process is complete and the proposal can be implemented (2013-14 recommendations are in WRRB letter of May 31, 2013).

It would be advisable to ensure submission of any future management proposals in sufficient time to allow for full review and implementation prior to the start of the harvest season for which they are intended.

3) Planning in Advance of the 2015 and 2018 Bathurst Caribou Calving Ground Surveys

The WRRB understands that the two governments plan to re-assess the harvest recommendations in the joint proposal after reviewing the results of the 2015 and 2018 Bathurst caribou calving ground surveys. The WRRB encourages both governments to undertake a proactive approach in advance of these surveys that addresses in detail the proposed management response to two scenarios: one where there is a substantial improvement in the herd, the other where there is a substantial decline.

The WRRB looks forward to continued collaboration with the GNWT and TG on Bathurst Caribou herd management. If you have any questions regarding this matter, please contact our office at (867) 873-5740 or jmccullum@wrrb.ca (or jsnortland@wrrb.ca after August 5).

Sincerely,



Grant Pryznyk
Interim Chair

Cc Ernie Campbell, Deputy Minister, ENR
Fred J Mandeville, Superintendent, North Slave Region, ENR
Laura Duncan, Tłı̨chǫ Executive Officer, TG
Sjoerd van der Wielen, Manager, Department of Culture and Lands Protection, TG
Kerri Garner, TG

