



Alternatives North

Mr. Joseph Judas, Chair
Wek'èezhii Renewable Resources Board
4504 49TH AVENUE
YELLOWKNIFE NT
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27 February, 2019

Dear Mr. Judas:

Joint Management Proposal for Bathurst Caribou

Thank you for the opportunity to comment on this proposal currently under Level 2 review by the Board. Alternatives North is a social justice coalition operating in the Northwest Territories. Within our ranks are representatives of churches, labour unions, environmental organizations, women and family advocates and anti-poverty groups. Individual citizens are also important participants in our work.

We have reviewed the Tlicho Government and Government of the Northwest Territories' Joint Management Proposal for actions related to the Bathurst Caribou Herd, and would like to submit the following comments for the Board's consideration. We are aware that this herd has plummeted from greater than 400,000 in the 1980s, and that there has been a greater than 50% decline between the two most recent surveys in 2015 and 2018, to only about 8,200 animals.

Harvest Management

We did not find sufficient information to conclude that harvest of Bathurst Herd caribou is either zero, known at all, or even estimated. While the quota is set at zero, with compliance approaches, measures and regulations that have been agreed on and supported by the leadership of affected 1st Nations, we again found no reference to documentation of efforts to determine the degree to which that is effective or complied with, nor do we see any ways to estimate the unknown harvest that is certainly occurring under the Mobile Core Bathurst Caribou Conservation Area. Given that caribou quotas are provided for Bluenose East caribou that overlap on the winter range of Bathurst caribou, it is very likely that some of the caribou harvested under the BNE quotas belong to the Bathurst herd. The degree to which Bathurst caribou are vulnerable to this risk increases as the Bluenose East herd declines, providing less buffer against this likelihood.

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Further, we are not aware of any assessment of the accuracy of reporting on the numbers and sex composition of harvested Bluenose East animals from the overlapping winter range of the two herds with actual, directly observed evidence. Perhaps this information exists, however as mentioned, we are not aware of it if it does. Given the catastrophic crash of the Bathurst Herd, we question providing any risk of harvest (intended or unintended) of the relatively few remaining animals in the Bathurst Herd, especially cows.

Given the state of the Bathurst Herd, we ask the Board to ensure much more clarity and certainty that harvest of these animals is actually zero, or what the sex, age, and size of the unintended harvest is. These numbers should be compiled and publicly reported.

Habitat Management

We were surprised to see the proponents are recommending yet more work to identify key habitats for the Bathurst Herd. After decades of study and the lengthy development of the draft Bathurst Caribou Range Plan there is surely sufficient knowledge to put the focus on concerted effort to give protection to known key habitats. The extreme degree of resource exploration and exploitation within the range is well known, yet there is still no protected habitat within the range of the Bathurst Herd. The Range Plan is referenced in the Joint Management Proposal but the specific actions related to habitat protection are not included. In particular, there are no Mobile Caribou Conservation Measures or Offsetting / Compensatory Mitigation. Given the potential for extinction of this herd, we urge the Board to ensure decisive action to protect key habitat for these animals.

Predator Control

We understand there has been variable success in Alaska, Yukon, BC and NWT on the use of predator control to assist in the recovery of caribou populations. Certainly, indiscriminate poisoning during the mid-20th century was likely effective, but at unacceptable costs to ecosystems, non-targeted species, and the public. Predator control can be risky because rather than depressing predator populations it can stimulate reproductive rates of predators and stymie intended results and other control efforts. Measurement control efforts and measurement of success can be very expensive at the cost of other important management actions, and it requires some degree of certainty that the predators are actually causing the population decline or suppressing recovery. We urge the Board to ensure clarity of understanding on these aspects in any decisions towards an aggressive predator control effort.

One of the first considerations in contemplating intensive predator control is that there must be certainty that harvest of the caribou is nil, and although there is no quota

allowed, we see little investigative effort or evidence of that certainty at this time. Predator control in a vast range such as that of the Bathurst Herd would be a daunting undertaking, unlike other situations where control has been attempted in more restricted geographies. Access for control actions is poor compared again to other areas where control has been attempted, so achieving the intensity required would be a challenge. Financial cost of implementing and monitoring success would be substantial for the Bathurst herd because of the sizable range. Finally, as in any action today, and again knowing the size of the range involved, what is the greenhouse gas emission cost of the action.

Climate Change

Although uncertainty remains about the impacts of climate change, the evidence is accumulating that they may be severe. They certainly increase the vulnerability of this herd to any harvest at all with such depressed numbers.

These are our concerns, and we thank the Board for their consideration of our comments as they continue their very important work towards conservation of caribou for our people, cultures and ecosystems,

Sincerely,



Chris O'Brien, for
Alternatives North