

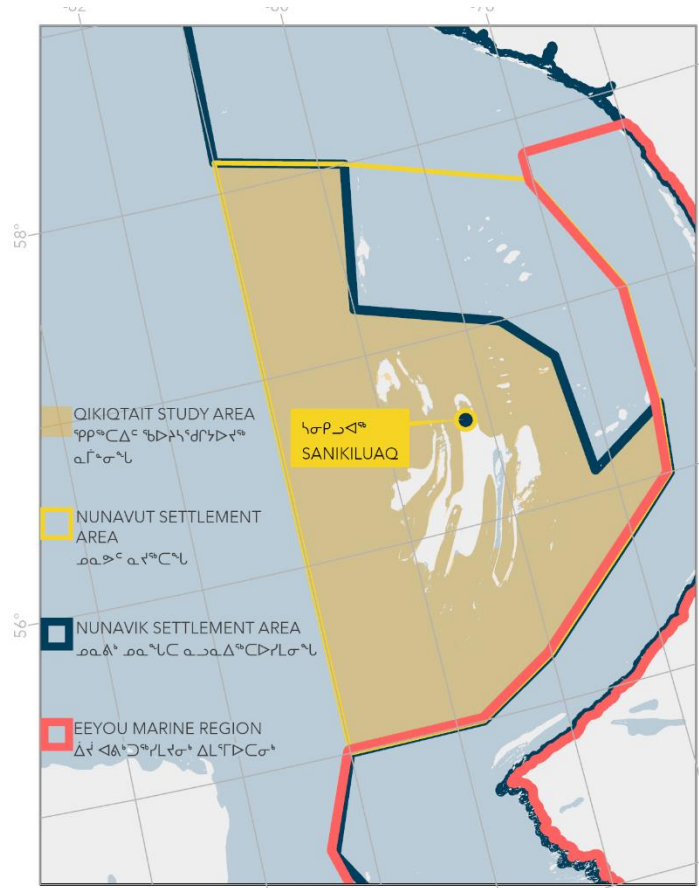
June 13, 2024.

**Re: Qikiqtait Study Area**

Dear Colleagues,

We are writing to share with you a proposed approach for the interim protection and conservation of the Qikiqtait Study Area. As we design the interim protection and conservation measure, we need information from stakeholders on current and ongoing activities within the Qikiqtait Study Area. The boundary of the area may be adjusted to reflect any previous and new agreements, feedback and perspectives received from partners and stakeholders.

Qikiqtait has been identified in the Qikiqtani Inuit Association’s (QIA) 2022 Prospectus on the regional conservation approach to contribute towards a network of protected areas across the Qikiqtani Region. QIA, the Government of Canada, and the Government of Nunavut are working together to explore marine conservation for Qikiqtait, focusing on Inuit-led conservation and stewardship.



Fisheries and Oceans Canada (DFO), along with the QIA and the Government of Nunavut, are assessing the use of an interim protection measure for Qikiqtait. The intention is that, if deemed desirable and feasible, a Protected Area (MPA) would be designated via a Ministerial Order under the *Oceans Act*. The Ministerial Order would have the effect of “freezing the footprint” of human activities within the area for up to five years, meaning any activity that has occurred in Qikiqtait over the twelve months prior to the day of designation (or that has been authorized to occur) would be allowed to continue. However, this does not apply to rights-based activities under the *Nunavut Agreement* within the Nunavut Settlement Area. All rights secured through the *Nunavut Agreement* are respected within the boundary of the Nunavut Settlement Area. Traditional harvesting within the Nunavut Settlement Area is a protected right under the *Nunavut Agreement*. In addition, scientific research, safety, security, and emergency activities, as well as certain activities carried out by a foreign national, entity, ship, or state, would be allowed in the MPA. During the 5-year timeframe of a Ministerial Order MPA, there will be a general prohibition of any new activity that disturbs, damages, destroys, or removes any unique geological or archeological feature any living marine organism, or any part of its habitat, within the boundaries of Qikiqtait. Knowing what activities are currently happening inside the Qikiqtait Study Area is very important. This awareness helps ensure all activities that are happening can continue to be allowed if Qikiqtait becomes a Marine Protected Area designated by Ministerial Order. As a result, it's necessary for us to know what local communities and stakeholders use the area for. This approach will ensure that this unique and vulnerable area is protected while Canada works with its partners and consults with communities and stakeholders to further pursue long-term protection of the area through an Inuit Protected and Conserved Area. This approach also supports the Minister of Fisheries, Oceans and the Canadian Coast

Guard's mandate commitment to work collaboratively with the Minister of Environment and Climate Change Canada to conserve 25 per cent of our lands and waters by 2025, and 30 per cent of each by 2030, while also supporting reconciliation, Indigenous-led conservation, and climate objectives.

A Marine Protected Area by Ministerial Order also aligns with Canada's Inuit Nunangat Policy, which was jointly developed with Inuit to ensure that all new federal policies, programs, services, and initiatives that apply in Inuit Nunangat and/or benefit Inuit are designed to support Inuit self-determination, prosperity and wellbeing (individual and community) throughout Inuit Nunangat with the goal of socio-economic and cultural equity between Inuit and other Canadians.

The establishment of a new MPA by Ministerial Order would provide time (up to five years) to complete a feasibility assessment for Qikiqtait and further explore the option of an Inuit Protected and Conserved Area. As part of the Government of Canada's commitment to protecting this important area, Fisheries and Oceans Canada continues to lead an ongoing research expedition to develop a knowledge base of the connected sea ice-ocean system of this region and further understand this important ecosystem. The program will continue to collect information to support informed decision-making around long-term protection in Qikiqtait.

The Government of Canada is collaborating with QIA and GN on the potential designation of a Ministerial Order MPA in 2025 to contribute to the Marine Conservation Targets. We are asking that anyone who goes to the Qikiqtait Study Area please provide a list of any current or anticipated activities. Examples of such activities may include outfitting or tourism, photography, visiting the area by hiking, pleasure crafts, cruise ships, or snowmobiles, recreational or commercial fishing, commercial hunting, commercial harvesting of aquatic species, or any other activity. Providing a list of activities will ensure that these activities will be able to continue during the five-year period of the Ministerial Order MPA.

We invite you to provide a list (see attached Excel form) of your current and anticipated activities within the boundaries of Qikiqtait. We also ask that you please distribute this request to any affiliated organizations or individuals who may have current or anticipated activities in the area.

Please let us know if you are interested in additional information about Qikiqtait, we would also be happy to meet with you to provide an opportunity for further discussion. If you have any questions regarding this initiative or the contents of this letter, please feel free to contact the Arctic Marine Planning and Conservation team via email at [DFO.ArcticMPC-ArctiquePCM.MPO@dfo-mpo.gc.ca](mailto:DFO.ArcticMPC-ArctiquePCM.MPO@dfo-mpo.gc.ca).

Sincerely,

*Richard Paton*

C. Thomas Hoggarth  
Executive Director, Marine Conservation  
Arctic Region  
Fisheries and Oceans Canada

Richard Paton  
Assistant Executive Director  
Marine & Wildlife Conservation  
Qikiqtani Inuit Association

*Naomie Pudluk*

Naomie Pudluk  
Assistant Deputy Minister  
Department of Environment  
Government of Nunavut

## **Annex A. Description of Qikiqtait and Activity Scan**

The Belcher Islands EBSA was identified in 2011 as part of a larger evaluation conducted by DFO to identify EBSAs throughout Canada's Arctic (DFO 2011). In 2019, Sanikiluaq considered developing Qikiqtait as a blend of Marine Protected Areas (MPA) and National Wildlife Areas (NWA) to protect both the marine and terrestrial areas. In February 2023 Qikiqtait was identified as a marine area under consideration for conservation by the Government of Canada.

### ***Significance of Qikiqtait***

Qikiqtait and the Belcher Islands are a distinctive geographic and oceanographic region in southeast of Hudson Bay. The archipelago covers approximately 3,000 km of land and a total area of approximately 13,000 square kilometers. The Belcher Islands have recurring, biologically important polynyas. The area is ecologically significant due to several factors:

- **Biodiversity:** High benthic diversity, including sea urchins, sea cucumbers, and bivalves are found in this area. Many higher trophic level species (e.g., Beluga, Walrus, Common Eider, Polar Bear, Seals) found within this area. Local marine life also includes. Lemmings, foxes and arctic hare are found on land. The coast near Sanikiluaq is also home to Arctic Char, Capelin, Cod, Lump fish, Scallops, Sea Urchin, Sea Cucumber and Sculpin (Gilchrist and Robertson, 2000).
- **Primary Production:** Qikiqtait plays a critical role in ecosystem function whereby strong vertical mixing as a result of cold summer sea-surface temperatures sustains high primary productivity (Galbraith and Larouche, 2011).
- **Migration and Breeding Grounds:** The Belcher Islands act as an over-winter habitat for beluga and walrus, an important feeding grounds polar bear, support large populations of eider ducks. As well, the area supports high benthic diversity (DFO, 2011).
- **Climate Regulation:** The multiple reoccurring polynyas throughout Qikiqtait influence the exchange of heat, gases, and freshwater between the ocean and atmosphere, thereby playing a role in local and regional climate dynamics. It helps regulate the formation of sea ice and influences ocean circulation patterns (DFO, 2011).
- **Traditional Knowledge:** The people of Sanikiluaq call themselves Sanikiluarmit, meaning "people of the islands" (Qikiqtani Inuit Association, 2014). The earliest human habitation of the Belcher Islands dates to 700-500 BC (Maxell 1985). Subsistence harvesting for sea cucumber, scallops and sea urchin is done by community members in shallow waters close to communities, through the use of pull nets (Pers. Comm. Schroeder, 2020). Residents from Sanikiluaq also harvest Beluga whale and Walrus (FMHIS). Sanikiluarmit collect grasses along the shoreline and use the plant to make baskets (Lawrence, 2018).

Overall, Qikiqtait serves as a unique and vital ecosystem, supporting diverse marine life and is culturally important to Sanikiluaq.

### ***Proposed Conservation Objectives for Qikiqtait***

Conservation Objectives are very broad statements that describe what species or features in the protected area should be conserved. For a Marine Protected Area under the Oceans Act Conservation Objectives need to refer to protecting or conserving marine species, unique habitats, high biodiversity, and/or the ecosystem. These objectives guide the interim nature of this work and long-term objectives will be developed, in the future.

For Qikiqtait we are proposing the following objectives. The second statement reflects our commitments to the United Nations Declaration on the Rights of Indigenous Peoples Act Action Plan and the recommendations from the Qikiqtani Truth Commission.

- (1) To support the conservation, protection, and understanding of the marine environment around the Belcher Islands, including the wildlife and other species, that is of immense value to Inuit and Inuit culture.
- (2) To support Inuit leadership in the conservation of Qikiqtait to ensure the continuity of Inuit culture, values, and practices, including accumulating and passing down Inuit knowledge as well as Inuit stewardship and governance.



### ***Activities Scan***

Initial engagement of communities closest to Qikiqtait began in fall 2023, through consultations and through reviewing published activities we have the following knowledge of activities. All activities currently underway will be reflected in the development of the Regulatory Intent, which will enable these activities to occur following the designation of Qikiqtait as an MPA by Ministerial Order.

### ***Subsistence & Traditional Use***

All rights secured through the *Nunavut Agreement* are respected within the boundary of the Nunavut Settlement Area. Traditional harvesting within the Nunavut Settlement Area is a protected right under the *Nunavut Agreement*.

Eider ducks are harvested a food resource and the skin and feathers are used as material for clothing (Oakes 1991). Beluga whales are hunted around the Lukisee Islands in the spring (DFO, 2011). Skidoos tow boats to floe edges to facilitate the hunts. Seals are hunted in a bay near Flaherty Island (DFO, 2011). A wide array of birds are hunted, with two known hunting spots being the Sleeper Islands and the large bay in Middle Island (DFO, 2011). Sanikiluarmit also fish mussels, scallops, sea stars, sea urchins and sea cucumbers around the Belcher Islands (WWF, 2021). Sanikiluarmit harvest ivigak (yellow Arctic lyme grass) usually in the spring along shorelines to produce grass baskets (Lawrence, 2018).

### ***Scientific Research***

The Arctic Eider Society offers honoraria to hunters within the Qikiqtait area to document their harvests in detail on the SIKU app. The SIKU app collects information such as the number of animals harvested, dates of the harvest, condition of the animal, stomach contents, environment the animal was found and ice condition.

Qikiqtaaluk Corporation inshore fisheries research surveys the R.V. Ludy Pudluk to determine the commercial fisheries potential of marine invertebrate species such as whelk, sea cucumber, scallops and mussels. This research began in 2021 and is set to conclude in 2025.

Annie Mercier with Memorial University is leading an assessment on the status and value of marine benthic resources during the summer/fall of 2022 into the winter/spring of 2023.

From 2003-2022 the CCGS Amundsen has been operating in the Arctic and on occasion includes the Qikiqtait area. The CCGS Amundsen cruises in the area are likely to occur again in the future.

The RV William Kennedy has been doing research in the area collaboratively with the University of Manitoba, Fisheries and Oceans Canada and the Arctic Eider Society. The RV William Kennedy cruises in this area is ongoing for the foreseeable future.

### ***Tourism and Recreational Activities***

The Sanikiluaq Municipal website indicates that there are outfitters based in Sanikiluaq to take tourists on the land.

Outfitting – Sanikiluaq Outfitters provide services to tourists for the purposes of observing wildlife. They also provide services to tourists for the purpose of canoeing, sea kayaking and other land based activities.

Wildlife viewing - unknown if occurring within the Qikiqtait Study Area

Other types of recreational use – unknown if occurring within the Qikiqtait Study Area

### ***Shipping Activities***

Sealift/goods transport- NSSI in 2023 they offloaded in Sanikiluaq on October 10. A sealift vessel, the M/V Mitiq, from ArcticSealift will arrive into Sanikiluaq on July 19 2023 and depart on July 24 2023.

### ***Other Commercial Activities***

Commercial Fishing - unknown if occurring within the Qikiqtait Study Area

Commercial Harvesting of Aquatic Species - Occasional commercial selling of eider down harvested in Sanikiluaq (Canadian Northern Economic Development Agency 2015).

Oil, Gas, and Mineral Activities - unknown if occurring within the Qikiqtait Study Area

### ***References***

- Canadian Northern Economic Development Agency. 2015. Governments of Canada and Nunavut Announce Support to Revitalize Sanikiluaq's Eiderdown Industry. Available from <https://www.canada.ca/en/news/archive/2015/03/governments-canada-nunavut-announce-support-revitalize-sanikiluaq-eiderdown-industry.html>
- Fisheries and Oceans Canada, Science. 2011. Identification of Ecologically and Biologically Significant Areas (EBSA) in the Canadian Arctic. Available from <https://waves-vagues.dfo-mpo.gc.ca/library-bibliotheque/344747.pdf>
- Fishery Management and Harvest Information System (FMHIS). Fisheries and Oceans Canada.
- Galbraith, P.S., and Larouche, P. 2011. Sea-Surface Temperature in Hudson Bay and Hudson Strait in Relation to Air Temperature and Ice Cover Breakup, 1985–2009. *Journal of Marine Systems* 87(1): 66-78. doi:10.1016/j.jmarsys.2011.03.002.
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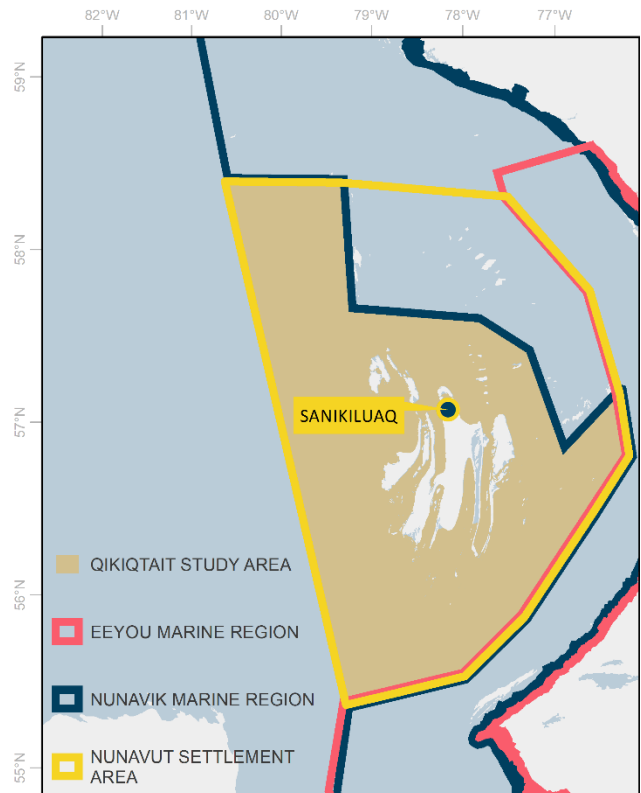
**Re: Qikiqtait Study Area**

Dear Colleagues,

We are writing to share with you proposed regulations for the interim protection and conservation of the Qikiqtait Study Area. We asked for information from industry and stakeholders on current and ongoing activities within the Qikiqtait Study Area through the distribution of a previous letter. The classes of ongoing activities (see annex) was derived from information provided by the Government of Nunavut, the Qikiqtani Inuit Association and stakeholder feedback. Classes of ongoing activities were also identified through community consultation and surveys.

Establishment of a Ministerial Order Marine Protected Area (MPA) under the *Oceans Act* has been proposed for Qikiqtait as an interim protection measure and a first step to establish long-term marine protection in Qikiqtait. The intention is that an MPA would be designated via a Ministerial Order under the *Oceans Act* in June 2025. The Ministerial Order would have the effect of “freezing the footprint” of human activities within the area for up to five years.

This means any activity that has occurred in Qikiqtait over the twelve months prior to the day of designation (or that has been authorized to occur) would be allowed to continue. However, this does not apply to rights-based activities under the *Nunavut Agreement* within the Nunavut Settlement Area. All rights secured through the *Nunavut Agreement* are respected within the boundary of the Nunavut Settlement Area. Traditional harvesting within the Nunavut Settlement Area is a protected right under the *Nunavut Agreement*. In addition, scientific research, safety, security, and emergency activities, as well as certain activities carried out by a foreign national, entity, ship, or state, would be allowed in the MPA. During the five-year timeframe of a Ministerial Order MPA, there will be a general prohibition of any new activity that disturbs, damages, destroys, or removes any unique geological or archeological feature any living marine organism, or any part of its habitat, within the boundaries of Qikiqtait. This approach will ensure that this unique and vulnerable area is protected while Canada works with its partners and consults with communities and stakeholders to further pursue long-term protection of the area through an Inuit Protected and Conserved Area. This approach also supports the Minister of Fisheries, Oceans and the Canadian Coast Guard’s mandate commitment to work collaboratively with the Minister of Environment and Climate Change Canada to conserve 25 per cent of our lands and waters by 2025, and 30 per cent of each by 2030, while also supporting reconciliation, Indigenous-led conservation, and climate objectives.



A Marine Protected Area by Ministerial Order also aligns with Canada's Inuit Nunangat Policy, which was jointly developed with Inuit to ensure that all new federal policies, programs, services, and initiatives that apply in Inuit Nunangat and/or benefit Inuit are designed to support Inuit self-determination, prosperity and wellbeing (individual and community) throughout Inuit Nunangat with the goal of socio-economic and cultural equity between Inuit and other Canadians.

The establishment of a new MPA by Ministerial Order would provide time (up to five years) to complete a feasibility assessment for Qikiqtait and further explore the option of an Inuit Protected and Conserved Area. As part of the Government of Canada's commitment to protecting this important area, Fisheries and Oceans Canada continues to lead an ongoing research expedition to develop a knowledge base of the connected sea ice-ocean system of this region and further understand this important ecosystem. The program will continue to collect information to support informed decision-making around long-term protection in Qikiqtait.

The Government of Canada is collaborating with QIA and the Government of Nunavut on the potential designation of a Ministerial Order MPA in 2025 to contribute to the Marine Conservation Targets. Attached in the Annex is the Regulatory Intent, please let us know if you are aware of another ongoing activity that is not captured in the ongoing activity list. We also ask that you please distribute this request to any affiliated organizations or individuals who may have current or anticipated activities in the area.

Please let us know if you are interested in additional information about Qikiqtait, we would also be happy to meet with you to provide an opportunity for further discussion. If you have any questions or feedback regarding this initiative or the contents of the Regulatory Intent, please feel free to contact the Arctic Marine Planning and Conservation team via email at [DFO.ArcticMPC-ArctiquePCM.MPO@dfo-mpo.gc.ca](mailto:DFO.ArcticMPC-ArctiquePCM.MPO@dfo-mpo.gc.ca).

Sincerely,

*Richard Paton*

*Naomie Pudluk*

C. Thomas Hoggarth  
Executive Director,  
Marine Conservation  
Arctic Region  
Fisheries and Oceans Canada

Richard Paton  
Assistant Executive Director  
Marine & Wildlife Conservation  
Qikiqtani Inuit Association

Naomie Pudluk  
Assistant Deputy Minister  
Department of Environment  
Government of Nunavut

## **Annex A. Regulatory Intent for the Proposed Qikiqtait Marine Protected Area by Ministerial Order**

### **I. Background and Significance**

The Belcher Islands Ecologically and Biologically Significant Area (EBSA) was identified in 2011 as part of a larger evaluation conducted by DFO to identify EBSAs throughout Canada's Arctic (DFO 2011). In 2019, Sanikiluaq considered developing Qikiqtait as a blend of Marine Protected Areas (MPA) and National Wildlife Areas (NWA) to protect both the marine and terrestrial areas. In February 2023, Qikiqtait was identified as a marine area under consideration for conservation by the Government of Canada.

#### ***Ecological Significance***

Qikiqtait and the Belcher Islands are a distinctive geographic and oceanographic region in southeast of Hudson Bay. The archipelago covers a total area of approximately 13,000 square kilometers. The Belcher Islands have recurring, biologically important polynyas. The area is ecologically significant due to several factors:

- **Biodiversity:** High benthic diversity, including sea urchins, sea cucumbers, and bivalves are found in this area. Many higher trophic level species (e.g., Beluga, Walrus, Common Eider, Polar Bear, Seals) found within this area. Local marine life also includes. Lemmings, foxes and Arctic hare are found on land. The coast near Sanikiluaq is also home to Arctic char, capelin, cod, lumpfish, scallops, sea urchin, sea cucumber and sculpin (Gilchrist and Robertson, 2000).
- **Primary Production:** Qikiqtait plays a critical role in ecosystem function whereby strong vertical mixing as a result of cold summer sea-surface temperatures sustains high primary productivity (Galbraith and Larouche, 2011).
- **Migration and Breeding Grounds:** The Belcher Islands act as an winter habitat for beluga and walrus, important feeding grounds for polar bear, and support large populations of eider ducks. As well, the area supports high benthic diversity (DFO, 2011).
- **Climate Regulation:** The multiple reoccurring polynyas throughout Qikiqtait influence the exchange of heat, gases, and freshwater between the ocean and atmosphere, thereby playing a role in local and regional climate dynamics. It helps regulate the formation of sea ice and influences ocean circulation patterns (DFO, 2011).
- **Traditional Knowledge:** The people of Sanikiluaq call themselves Sanikiluarmiut, meaning "people of the islands" (Qikiqtani Inuit Association, 2014). The earliest human habitation of the Belcher Islands dates to 700-500 BC (Maxell 1985). Subsistence harvesting for sea cucumber, scallops and sea urchin is done by community members in shallow waters close to communities, through the use of pull nets. Residents from Sanikiluaq also harvest beluga whale and walrus (WWF, 2021). Sanikiluarmiut collect grasses along the shoreline and use the plant to make baskets (Lawrence, 2018).

Overall, the Qikiqtait area serves as a unique and vital ecosystem, supporting diverse marine life and is culturally important to Sanikiluaq.

## ***Proposed Approach***

Establishment of a Ministerial Order Marine Protected Area (MPA) under the *Oceans Act* has been proposed for Qikiqtait as an interim protection measure and a first step to establish long-term marine protection in Qikiqtait. While interim protection is in place, the Government of Canada will explore the options for a long-term conservation measures in the area with the Qikiqtani Inuit Association (QIA) and the Government of Nunavut, through analysis and further consultation. The consideration of long-term conservation measures will include an Inuit Protected and Conserved Area (IPCA).

The Ministerial Order MPA will allow the Minister of Fisheries, Oceans and the Canadian Coast Guard to freeze the footprint of ongoing activities in the area for up to five years. This will mean that no new activities will be allowed in the area following designation. Any activities that have occurred, or were authorized to occur, in the proposed Qikiqtait MPA during the 12 months prior to designation would be considered ongoing activities and would be allowed to continue in the proposed MPA.

### **II. Proposed Objectives for Qikiqtait**

Conservation objectives are broad statements that describe what species or features in the protected area should be conserved. For an MPA under the *Oceans Act* conservation objectives need to refer to protecting or conserving marine species, unique habitats, high biodiversity, and/or the ecosystem. These objectives guide the interim nature of this work and long-term objectives will be developed, in the future.

The following objectives have been proposed for Qikiqtait. The second statement reflects our commitments to the United Nations Declaration on the Rights of Indigenous Peoples Act Action Plan and the recommendations from the Qikiqtani Truth Commission.

- (1) To support the conservation, protection, and understanding of the marine environment around the Belcher Islands, including the wildlife and other species, that is of immense value to Inuit and Inuit culture.
- (2) To support Inuit leadership in the conservation of Qikiqtait to ensure the continuity of Inuit culture, values, and practices, including accumulating and passing down Inuit knowledge as well as Inuit stewardship and governance.

### III. Map and Boundaries

The proposed boundaries for Qikiqtait were put forward by QIA. These boundaries are shown in Figure 1. If established, the boundaries will follow the Nunavut Settlement Area surrounding the Belcher Islands excluding the north-eastern portion where the Nunavut Settlement Area overlaps. The boundaries exclude Small Enclosed Bays as described in Chapter 1, Definitions and Interpretation of the Nunavut Lands and Resources Devolution Agreement signed January 18, 2024 between the Government of Canada and the Government of Nunavut and Nunavut Tunngavik Incorporated.

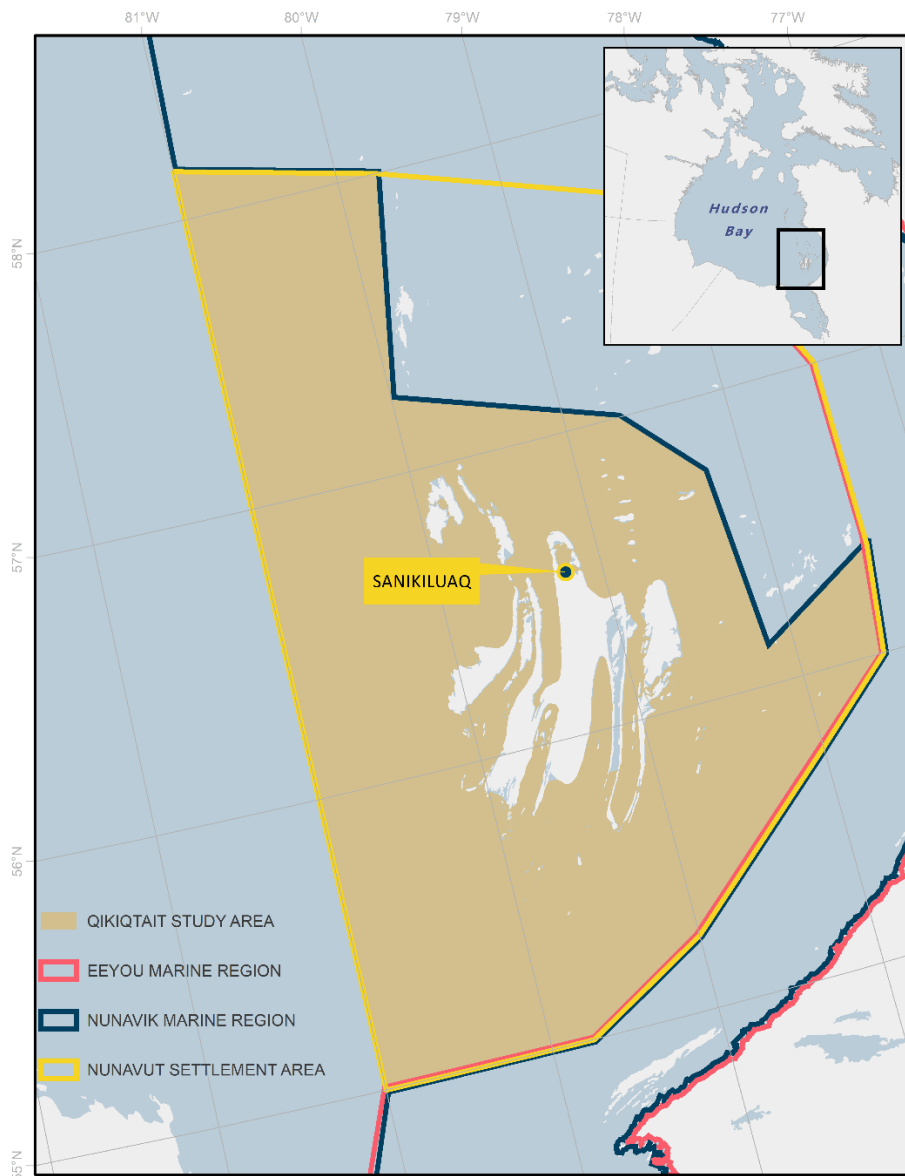


Figure 1. A map showing the boundaries of the proposed Qikiqtait MPA.

#### **IV. Prohibitions and Allowed Activities**

It is prohibited in the MPA to carry out any activity that disturbs, damages, destroys or removes from the MPA any unique geological or archeological features or any living marine organism or any part of its habitat, or is likely to do so.

However some activities would be allowed to occur. Activities listed below would be able to occur if Qikiqtait were to become an MPA by Ministerial Order:

- All rights provided for under the *Nunavut Agreement* are respected within the boundary of the Nunavut Settlement Area
- All ongoing activities (see list below) taking place one year prior to designation or activities that have otherwise been authorized to occur by applicable federal laws or by laws of a province/territory
- Research activities consistent with the conservation objectives of the MPA
- Safety, security and emergency activities

Under the *Oceans Act*, DFO would implement an MPA by Ministerial Order by prohibiting any other activities from occurring during the period of the Order, up to five years.

#### **V. List of Ongoing Activities**

Ongoing activities can continue to occur if Qikiqtait becomes an MPA by Ministerial Order under the *Oceans Act*. The definition of an ongoing activity is any activity that has taken place one year prior to designation, or activities that have otherwise been authorized to occur by applicable federal laws or by laws of a province/territory.

Activities occurring within the proposed Qikiqtait MPA boundaries have been categorized into classes of ongoing activities which will be allowed in the MPA:

- Hunting and trapping activities
- Fishing activities
- Harvesting of marine plants
- Marine navigation activities
- National defence activities carried out by the Department of National Defence
- Canadian Coast Guard activities carried out by the Canadian Coast Guard
- Tourism activities
- Recreational activities
- Educational activities
- Travel over sea ice using motorized vehicles and non-motorized methods
- Traditional Knowledge and cultural research activities
- Scientific research activities
- Filming activities
- Activities provided for and carried out in a manner not inconsistent with the Nunavut Agreement

***Please let us know if you are aware of another ongoing activity that is not captured in the list above.***

## **References**

- DFO. 2011. Identification of Ecologically and Biologically Significant Areas (EBSA) in the Canadian Arctic. DFO Can. Sci. Advis. Sec. Sci. Advis. Rep. 2011/055. Available from <https://waves-vagues.dfo-mpo.gc.ca/library-bibliotheque/344747.pdf>
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