IUCN/Species Survival Commission
Polar Bear Specialist Group

Nunavut Wildlife Management Board
Box 1379
Iqaluit
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Tromsø, Norway, September 29, 2011

Re: Written hearing of the Nunavut Wildlife Management Board to consider proposed modification to the 2011-2012 level of total allowable harvest for the Western Hudson Bay polar bear subpopulation in the Nunavut Settlement Area

On September 9, 2011, the Nunavut Wildlife Management Board invited the IUCN/SSC Polar Bear Specialist Group (PBSG), to comment on the proposal by the Government of Nunavut's Department of Environment to increase the total allowable harvest (TAH) for the Western Hudson Bay polar bear subpopulation, in the Nunavut Settlement Area, from its current level of 8 bears to 21 for the 2011-2012 harvest season. The following is our evaluation of the proposal, and recommendation.

In summary, the PBSG strongly opposes the proposed increase in the TAH for three basic reasons: 1) even the present TAH is not sustainable so an increase only makes the resulting overharvest even less sustainable; 2) there is no indication that any of the other jurisdictions or agencies that share responsibility for conservation and management of this subpopulation have even been consulted about this proposed increase, let alone indicate they support it; and, 3) the increase is being proposed for approval ahead of when two large and very expensive studies are due to report on the status and trend of the Western Hudson Bay polar bear subpopulation, information, which should be of primary importance to consider *prior* to making a decision of any kind.

In point form as follows, the PBSG details the reasons for its strong objections to this proposed increase in the TAH for the Western Hudson Bay polar bear subpopulation.

1. Based on the results of over 25 years of intensive research, it has been demonstrated in the peer-reviewed scientific literature that the population of polar bears in western Hudson Bay has declined by over 20% between 1987 and 2004. The principal cause has been the negative effects of climate warming which has caused the sea ice to break up earlier, the bears to come ashore earlier with less stored fat on which to survive an ever-increasing duration of the open water season. There is a statistically significant relationship between the progressively earlier dates of sea ice breakup and declining reproduction and survival of cub, subadult, and old polar bears; in other words, the earlier the breakup, the worse it is for polar bears in all these categories. When all available data have been analyzed, the population appears to continue declining, even with no harvest at all. By definition, it is not possible to have a sustainable harvest from a declining population.

2. Although the current TAH of 8 bears was granted to allow maintenance of a low level of subsistence harvest to support traditional use, it was recognized at the

time it was likely not sustainable because the population would probably continue to decline with no harvest at all. Additionally, because many of the problem bears killed on the Kivalliq coast are additive to the TAH, rather than being included, it is clear that human-caused removal from the Western Hudson Bay subpopulation, from Nunavut alone, is not sustainable.

3. Because of the information contained in points 1 & 2, the proposed increase in the TAH is clearly contrary to what would be recommended on the basis of "the best available scientific evidence" and thus contravenes the intent of the Agreement on the Conservation of Polar Bears (1973), which Canada has both signed and ratified. Article II of The Agreement states that "Each Contracting Party.... shall manage polar bear populations in accordance with sound conservation practices based on the best available scientific data."

4. Because of recognition that Inuit Traditional Knowledge is not consistent with the conclusions of the scientific studies in Western Hudson Bay, additional surveys, paid for by the Nunavut Government have been conducted. In 2007 and 2010, a mark-recapture and an aerial survey respectively, based on "important summering areas" identified by Inuit Traditional Knowledge, were conducted in the Nunavut portion of the terrestrial habitat occupied by this population during the open water period in the summer and fall. Both these studies, conducted in late summer and early fall, were designed using local TEK to identify possible concentrations of polar bears in Nunavut that might have been missed because the mark-recapture studies, conducted during the same time period, were only done Manitoba. In both years, neither survey located concentrations of polar bears that might have been missed by earlier surveys. In 2007, only 25 bears were seen in the area specified by TEK and the proportion of bears originally tagged in Manitoba did not differ significantly from that in the main study area south of 60° N. In 2010 biologists on the aerial survey saw a similar number of polar bears (Government of Nunavut submission to the PBTC 2011) but were not given permission by NU to capture the animals observed so they were unable to confirm where tagged bears might have originated. A third survey, funded by Nunavut and several other groups, was conducted in the summer of 2011 but the results are not yet available.

5. The results of the 2007 and 2010 surveys do not support the contention in the letter from Minister Shewchuk that the survey documented significant densities of polar bears in areas un-sampled by the Regehr et al. (2007) study. In fact, the conclusion in the report of the 2007 (Peacock & Taylor 2007) survey clearly stated that the bears captured in this study were *not* a spatially-distinct sub-group of the WH subpopulation during the time of year when the sampling reported in Regehr et al. (2007) occurred. The results of the 2007 survey were reported to the Canadian Federal-Provincial-Territorial Polar Bear Technical Committee in February 2008. The report from the 2010 aerial survey also noted that polar bears were found in low densities in the western Hudson Bay region of Nunavut during the late summer.

6. Polar bears are currently listed as a "threatened species" in Manitoba. Parks Canada protects the main maternity denning areas for the Western Hudson Bay

subpopulation in Manitoba. The tourist industry in Manitoba depends on living bears present on the Hudson Bay coast to support their thriving tourist industry. There is no indication that either Manitoba or Parks Canada was consulted about the proposed increase in the TAH, nor was there any indication they would support such a change. In the next adjacent subpopulation (Southern Hudson Bay), Ontario has also classified polar bears as threatened. Similarly, there is no indication that Ontario supports the proposed increase in TAH levels, or was consulted.

7. Proposing an increase in the TAH, in a subpopulation where the scientific information suggests the subpopulation is declining and where there is no indication it could be supported, is not consistent with the "precautionary principle", widely accepted by conservation organizations around the world, in which increases in harvest levels are not made where there is uncertainty about whether or not they could be sustained. It is the opinion of the PBSG that this proposed increase is not sustainable and thus should be rejected.

8. No new Traditional Knowledge has been presented to support the proposed quota increase and demonstrate that it would be sustainable. Rather the recommendation appears to be an attempt to reconcile past harvest rates and be based on "strongly held views" that the scientific population estimate is too conservative. In the view of the PBSG, such an approach is not defensible.

Should the Nunavut Wildlife Management Board require any additional information or clarification, please contact me and I will coordinate the request with the Specialist Group.

Sincerely yours,

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