

**IUCN/Species Survival Commission  
Polar Bear Specialist Group**



Mr. Ben Kovic  
Chairperson,  
Nunavut Wildlife Management Board  
Box 1379  
Iqaluit, NU X0A 0H0 Canada

May 13, 2014

**Re: Public hearing concerning the regional total allowable harvest for the M'Clintock Channel polar bear subpopulation**

Dear Mr. Kovic,

One of the mandates of the IUCN/SSC Polar Bear Specialist Group is to provide advice, when asked, on the status of polar bears throughout their range, based on the best available scientific information. We thank the Nunavut Wildlife Management Board (NWMB) for the opportunity to comment on the request from the Kitikmeot Regional Wildlife Board (KRWB) for an increase from 3 to 18 in the Total Allowable Harvest (TAH) for the M'Clintock Channel (MC) polar bear subpopulation.

In reviewing the letter from the KRWB, there does not appear to be any new scientific information which the PBSG could review to evaluate whether a 600% increase in the TAH could be sustained. However, I note that point 3 of the letter from the KRWB refers to 'other studies' that have been completed in addition to an Inuit knowledge study. Is it possible for the PBSG to obtain copies of these studies in time to allow for review? If these studies contain no new scientific information, the PBSG recommends that the NWMB apply the precautionary principle and wait for the results of the proposed new survey of the MC subpopulation that is to be conducted by Government of Nunavut.

I acknowledge that under the MOU for the MC subpopulation, a 'Guided Harvest Rate' based on *Inuit qaujimagatuqangit* may be allowed, but without sufficient new scientific information to review, the PBSG is unable to evaluate the proposal. Thank you for providing the PBSG with this opportunity and we look forward to being of assistance in the future.

Sincerely,

Dag Vongraven  
Chair, IUCN/SSC Polar Bear Specialist Group

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