



January 31, 2025

**Written comments from ECCC - Canadian Wildlife Service Wildlife Management and Regulatory Affairs Division to the Nunavut Wildlife Management Board concerning: “TAB 3 – Harvest Accumulation and Credits for Viscount-Melville Polar Bears”**

**General comments**

- Environment and Climate Change Canada (ECCC) acknowledges the submission by the Kitmeot Regional Wildlife Board and Ekaluktutiak Hunters and Trappers Organization to the NWMB.
- ECCC acknowledges the recommendations put forward to the NWMB regarding the recommendation to increase the “Annual recommended quota” for 2025-2026 from 3 to 19 for the Viscount-Melville (VM) polar bear subpopulation, the concerns raised regarding harvest data accessibility by HTOs and RWOs and the recommendation of shifting how polar bear management is viewed and approached to “respect and empower Inuit self-determination, and considers the physical, mental and cultural well-being of Inuit”.

ECCC believes the outcome of the TAB3 submission could affect matters of federal jurisdiction. Accordingly, ECCC would like to submit the following clarifying questions for consideration by the NWMB:

1. With regards to harvest data sharing

- ECCC would like to better understand the ethical concerns for Inuit self-expression and -representation expressed with regards to harvest data being shared or used at national and international levels without consent, inclusion or awareness of Hunters and Trappers Organizations (HTO) and Regional Wildlife Organizations (RWO). Could specific examples be provided? Within this context, we would like to share that ECCC continues to represent Canada as a Polar Bear Range State (PBRs) member and signatory to the *1973 Agreement on the conservation of polar bears*. The PBRs are currently advancing Objectives and Actions under the 10-year Circumpolar Action Plan (CAP). We would welcome an opportunity to understand whether data that appears on the Polar Bear Range States website (e.g. <https://polarbearagreement.org/working-groups/human-polar-bear-conflict/pb-conflict>) is of such concern?

2. With regards to Polar Bear Trade under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)

- This submission does not reference any implications for CITES. However, ECCC would like to offer the observation that Canada is a Party to CITES. Currently, the polar bear is listed on Appendix II of CITES, requiring a CITES export permit (as per requirements under Article IV of the Convention) to enter international trade. CITES export permits can be issued only upon advice from the country’s CITES Scientific Authority that the trade will not be detrimental to the survival of the species (known as a non-detriment finding or NDF). Canada updated and published an NDF document in March 2024 ([available here](#)). The NDF document provides

background and considerations of the Scientific Authority when making the NDF for export permit applications. While this NDF Report provides an overall assessment of non-detriment, each permit is evaluated on a case-by-case basis. It is possible that there are implications under CITES under this recommendation. ECCC would like to flag these to the board for consideration.

3. With regards to the population status of the Viscount-Melville polar bear subpopulation

- ECCC acknowledges the population status information submitted as part of the recommendation. ECCC would like to supplement this information and offer the observation that proposed potential quota of 19 bears for the 2025-2026 harvest season, if filled, would represent a potential harvest of 8.1% of the subpopulation.
- Additionally, ECCC would like to note that although the Viscount Melville polar bear subpopulation grew from 1989-2014, partially in response to a harvest moratorium, results from the Regehr et al. 2024 paper referenced within the submission estimated an un-harvested intrinsic growth rate of 0.01 (95% CRI [-0.06, 0.07]; or alternatively, finite population growth rate = 1.01 [95% CRI [0.94, 1.07]]) and suggested very limited or slow population growth. ECCC notes that low body condition, low observed numbers of seal kills, and low adult female survival observed in this study suggest that a precautionary approach should be taken regarding harvest management.

We appreciate the opportunity to submit these clarifying questions and observations in advance of the NWMB meeting and are looking forward to the discussion on February 26<sup>th</sup>, 2025.