







the effective cataloging of information and guidelines for the use of IQ information collected by co management partners. There must also be a process for looping in new information into the decision making process, but also verifying information as well.

In light of a management plan that relies heavily on IQ, QWB wonders what strategies the GN, and all co management partners, have in order to meet the IQ specific needs outlined in this plan. This is a responsibility that is larger than a council of elders or a single IQ coordinator. It requires a Nunavut wide strategy that includes all co management partners. This is needed because no useable methodology for collecting IQ from beginning to reporting has been developed. Not spending time and committing resources to this results in nothing more than having a plan that speaks of the importance of IQ but does not act from it.

Perhaps no where is this work more pressing than when considering polar bear sub populations and boundaries. QWB understands that polar bear boundary discussion occur at the PBTC and are scientific in nature. We are also aware that boundary related decisions are based on collaring data (page 15). The question we would raise is where does this leave Nunavut communities? In what ways does the GN anticipate informing and engaging the communities on these important matters. These are practical questions that must be considered and some thought must be put into a response as both the plan itself, and the consultation report stress the importance of changing existing polar bear boundaries.

Finally, in relation to IQ and science, we encourage the GN to consider the tension of using both systems within the department itself. We raise this question based on our experience with the Foxe Basin subpopulation. As you are aware, QWB requested an increase for this subpopulations TAH. After a public hearing, NWMB provided an initial recommendation to the GN. The GN rejected the initial recommendation and in a letter dated May 29, 2014, provided its rationale for that rejection. The rationale focused largely on the scientific data and population estimates connected to the MoU system. The letter also raised concerns about the validity of the mark and recapture system in developing accurate population estimates. This argument was present just months after a Nunavut wide consultation tour in which the delegates representing the GN presented to all communities this very system, and touting the value of this method in lieu of collaring. This contrast, the two arguments by the same department within a



small timeframe is confusing at best, and it leads QWB to wonder which perspective the GN really supports. We feel it is necessary for the GN to find their own common ground on this matter and ensure the management plan reflects it.

- 3) QWB recommends that a section be included to the plan that highlights the dangers of polar bears, or explain how polar bears attack. This is necessary to ensure the plan speaks to the real danger polar bears pose to people. This will also interrupt the gentle or victim view the international community has on Polar Bears.
- 4) HTOs continue to state that investigations into defense kills do not occur as efficiently as the plan presents them. Polar Bear hides have been ruined and HTOs have not been active in claiming those damages. Does the department have a staffing plan and secured funds to address this matter? QWB staff are committed to ensuring HTO's follow up with claims for damaged hides.
- 5) QWB would argue that the focus of the plan will need to develop to not just focus on the polar bear as an autonomous being, but take a broader approach include polar bear habitat. For example, on page 19 of the plan, its states that if a decline in population is noted by science/local knowledge, then action to be taken will be to reduce the TAH. The concern is that in action, the plan focuses on the harvestors only.
- 6) QWB understands the GN is committed to on going polar bear research. Does the GN have a departmental plan to ensure it has the needed resources and staff to carry out the research schedule, ensure research analysis can occur, and an effective system for reporting back is in place?
- 7) QWB recommends that a comprehensive communications plan on this plan be developed. It would need to be a plan that is rooted in Inuktitut and developed not from the government perspective, but from the community perspective. As the GN was represented at the community consultation tour, as were members of the co management partners, we believe a co management approach to develop an appropriate communication plan would greatly inform the communities about this new management plan, and be an important catalyst in applying the plan within each community.

