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Mikidjuk Akavak
Chairperson
Nunavut Wildlife Management Board

Sent electronically: makavak@nwmb.com

Re: Request for submissions regarding the Nunavut Wildlife Management Board's (NWMB or Board) upcoming public hearing to consider the proposed modifications to the current Total Allowable Harvest for the Davis Strait Polar Bear Subpopulation

May 9, 2011

Dear Mr. Akavak,

Thank you for your invitation to WWF-Canada to provide a submission regarding the proposed modifications to polar bear harvest quotas for the Davis Strait polar bear subpopulation. Along with NWMB and other agencies, WWF is committed to maintaining a sustainable future for polar bears and other wildlife while preserving opportunities for Arctic people.

The overall assessment and recommendations by the Board for this subpopulation accurately reflect the best available science and management, including the need for a cautionary approach. The estimated population is currently higher than the target value in the Nunavut MOU. Thus it would follow that there could be a modest increase in the allowable harvest. It is also appropriate that Labrador sees the bulk of any increase in quota as this more fairly distributes the harvest among jurisdictions.

A complicating factor is that Quebec currently has a total quota for polar bear harvest across the province that is not allocated among sub populations, so that it is difficult to know the actual harvest levels until well after the fact, making transparent and sustainable management of this shared polar bear subpopulation more difficult.

Any changes in harvest should also reflect anticipated changes in the population or the carrying capacity of the region along with a concrete plan and firm commitments to assess those changes in the future.

The Arctic is experiencing very rapid rates of change due to rapid warming. It is incumbent on all management authorities to anticipate these expected changes in all forward looking plans, including harvest decisions. In the case of Davis Strait, there is evidence that this subpopulation may now be declining due to changes in environmental carrying capacity. If carrying capacity has indeed decreased, then one reasonable management approach is to assist the population down to a new level that can be sustained by the environment as suggested by your recommendations. This may also be one of several approaches needed in and around communities to reduce potential bear human conflict.

If the recommendations for increased harvest are undertaken as a population reduction for conservation purposes, which appear to be the case, parties need to consider whether resulting

hides could or should enter into commercial trade. Such trade could be perceived as contravening the International Agreement on the Conservation of Polar Bears and raise unwanted attention regarding future CITES discussions.

WWF recommends:

1. Firm government commitment to adaptive management and a new survey in five (rather than seven) years, or an automatic reduction to 2010 levels in the absence of new information.
2. Quebec should consider significant revisions to the current blanket quota allocation for polar bear harvest and shift to specific sub population quotas set in collaboration with neighbouring jurisdictions and at sustainable levels.
3. Increased coordination of both management (timely and transparent reporting systems) and research efforts among adjacent Canadian jurisdictions (Quebec, Ontario, Newfoundland, and Nunavut).
4. Explicit recognition by Nunavut, Quebec, and Environment Canada that persistent warming in this region is projected to lower the carrying capacity in the long run, requiring more active management and frequent monitoring.

Thank you once more for giving us the opportunity to provide our perspectives on this important issue.

Sincerely,



Gerald Butts
President and CEO
WWF-Canada