Gatineau, QC K1A 0H3

JUL 2 9 2013

Mr. Manasie Audlakiak Acting Chairperson Nunavut Wildlife Management Board Box 1379 Igaluit NU X0A 0H0

Dear Mr. Audlakiak:

Thank you for your email message of June 28, 2013, addressed to the former Minister of the Environment, the Honourable Peter Kent, providing me the opportunity to comment on the proposed change in total allowable harvest (TAH) from the Foxe Basin management unit of polar bears in the Nunavut Settlement Area.

Environment Canada recognizes the unique role that the Wildlife Management Board plays in integrating its perspective with that of others stakeholders at this stage of the process. Environment Canada also recognize that this correspondence will be made public and hopes that this will be seen as evidence of the openness and thoroughness of the decision making process that has been established in Canada.

According to the status table produced by the Polar Bear Technical Committee (PBTC) at the 2013 annual meeting, the population estimate for polar bears in Foxe Basin is $2,580~(2,093-3,180\pm2~SE)$. Considering the previous population estimate of 2,300~(based~on~PVA~following~studies~completed~in~1994) we can consider that the population is stable. This aligns with the 2013 PBTC assessment that determined both the predicted and recent trends to be "stable". For the past five years, and in consideration of the previous population estimate, the combined harvest (NU & QC) has been 109 bears, which is approximately the maximum sustainable yield (MSY) according to PBTC calculations. The new population estimate provides an MSY of 120 bears, indicating that a small increase in harvest could be considered sustainable provided that the combined take by Nunavut and Quebec does not exceed 120 bears per year, that the sex-selective harvest regime is followed, and that the flexible quota system is always applied.

As you know, at the current time there is no legal limit to the number of bears that can be taken by hunters in Nunavik. While the Nunavik Marine Region Wildlife Board is in the early stages of developing a management system for the province, it is unlikely that quotas for any management units from which Nunavik Inuit harvest will be in place before the 2014-15 harvesting season. As you mention in your letter, it will be important to consider the needs and harvest levels of Nunavik hunters when making a





determination on quota increase. Indeed, while take from Foxe Basin by Nunavik Inuit is typically low (range of 0 to 4 bears in recent years), there is a potential for this to change in the future. That said, any increases to harvest by Nunavut should be considered temporary until the management system in Quebec has been put in place. I am hopeful that any issues of allocation between the two jurisdictions can be resolved during the interjurisdictional process for the Eastern Arctic management units at a meeting that is being developed for the fall of 2013.

In summary, given the status of the Foxe Basin management unit, I consider a small increase to the TAH of no more than nine bears per harvest season within the Nunavut Settlement Area would be biologically sustainable taking into account that the Foxe Basin management unit of polar bear is assessed as stable. As such an increase would mean that harvest levels would be very close to the MSY, it is important that the status of this management unit and harvest from it be regularly and carefully monitored and reviewed. I further recommend that this TAH level be re-examined as the Nunavik management system is put place and a harvest level is being established for Nunavik hunters.

As Canada's management of polar bear continues to be under intense international scrutiny, I cannot over-emphasize the importance of ensuring that the setting of harvest levels continue to follow sound conservation principles. I recommend that the NWMB take a cautious approach in their deliberations. Now, more than ever, it is vital that we be able to prove to the world that polar bears continue to be managed in a responsible manner.

Sincerely,

Sue Milburn-Hopwood

Director General

Canadian Wildlife Service