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Nunavunmi Anngutighatigut Aulapkaajitkut Katimajiat  
Nunavut Wildlife Management Board

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Tammaqtailinahuariniit anngutighat atuqhugit Inuit qaujimajatuqangillu ilihimaniillu ilitquhiannin  
Conserving wildlife through the application of Inuit Qaujimajatuqangit and scientific knowledge

February 1, 2022

Honourable David Akeeagok  
Minister of Environment  
Government of Nunavut

Dear Minister Akeeagok:

**Re: NWMB Decision on the Request for Approval of the Polar Bear Harvest  
Administration and Credit Calculation System (HACCS)**

**Background**

At the Nunavut Wildlife Management Board's (NWMB or Board) Regular Meeting, held on December 9, 2021 (RM004-2021), the Government of Nunavut submitted an application to the Board to approve the polar bear *Harvest Administration and Credit Calculation System* (HACCS). The HACCS, a revised version of the 2019 *Flexible Quota System* (FQS), is proposed to be used in Nunavut to administer the portion of the Total Allowable Harvest (TAH) allocated to a given community. The purpose of the HACCS is to administer changes to polar bear harvest management in Nunavut resulting from the decision by NWMB and Minister in 2019 to change the sex-selective harvest ratio from two males for every female (2:1) to up to one female for every male (1:1). It allows communities to accumulate credits for future use when the annual allocation is under-harvested. It also allows for credits to be deducted from the following year's base allocation when polar bears are over-harvested.

In August 2019, the FQS—first negotiated in 2005, was revised to accommodate the 1:1 male to female ratio for polar bear harvest across Nunavut. The revised FQS was approved by the NWMB on an interim basis in September 2019, pending further consultation with co-management partners. The Government of Nunavut revised and re-submitted the 2019 FQS<sup>1</sup> for approval by the Board in its June 10, 2020, Regular Meeting.

At the NWMB's In-Camera Meeting on June 11, 2020 (IC002-2020), the Board did not make a decision on the HACCS but decided to extend the validity of the 2019 FQS pending further consultations with co-management partners. The Board also recommended that Nunavut Tunngavik Incorporated (NTI) and the Regional Wildlife Organizations (RWOs), in

<sup>1</sup> The revisions to the 2019 *Flexible Quota System* included the renaming of it to the *Harvest Administration and Credit Calculation System*.



consultation with their communities' HTOs, provide feedback on the FQS and work with the Government of Nunavut to resolve any disagreements.

On November 5, 2021, the Government of Nunavut submitted a revised version of the HACCS for the Board's approval following consultation with and feedback from co-management partners.

During the Board's Regular Meeting on December 9, 2021, the Government of Nunavut presented the HACCS and made submissions on its consultation with co-management partners. Co-management partners also presented oral and written submissions.

At the NWMB's In-Camera Meeting on December 10, 2021 (IC004-2021), the Board considered the Government of Nunavut's application alongside oral and written submissions from co-management partners and made the following decision and recommendations:

*RESOLVED that, pursuant to the Board's authority under Section 5.2.34(d)(i) of the Nunavut Agreement, the Nunavut Wildlife Management Board approves the Government of Nunavut's Polar bear Harvest Administration and Credit Calculation System.*

*FURTHER RESOLVED that the Nunavut Wildlife Management Board recommends that:*

- *The Government of Nunavut and co-management partners work together towards a fair and acceptable accounting system for polar bears killed in defense of life and property (DLPK);*
- *The Government of Nunavut and co-management partners work together towards a fair and acceptable alternative to resetting harvest credits to zero when a new sub-population Total Allowable Harvest is set;*
- *The Government of Nunavut explore options to improve public access to polar bear harvest administration and increase involvement of Regional Wildlife Organizations in the management and allocation of community harvest credits.*



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***Decision to approve the Polar Bear Harvest Administration and Credit Calculation System (HACCS)***

The application before the NWMB was to seek its approval of the Government of Nunavut's Polar bear Harvest Administration and Credit Calculation System (HACCS). The HACCS is intended to be an administrative tool to keep track of polar bear harvesting at the community level. The HACCS operates once a community allocation has been decided by the Regional Wildlife Organizations (RWOs) for 'regional TAHs' or by the NWMB and Minister for 'community TAHs'. The NWMB has discretionary authority under section 5.2.34(d)(i) of the *Nunavut Agreement* to approve plans for the management of wildlife. During the Regular Meeting, the GN stated there are no Non-quota Limitations in the HACCS.

The HACCS regulates the polar bear sex-selective harvest ratio and sets credit accumulation and use rules. The Government of Nunavut stated that the HACCS is integral to implementing the Board's and Minister's decisions on (1) the *Nunavut Polar Bear Co-Management Plan* and (2) the change in the sex-selective harvest ratio from 2:1 to 1:1. The Board approved the FQS on an interim basis in 2019. It has been implemented during the 2019/2020 and 2020/2021 harvest seasons. In June 2020, the Board extended the validity of the 2019 FQS, pending further consultations with co-management partners. In a letter to the then Minister of Environment on July 6, 2020, the NWMB encouraged the Government of Nunavut and relevant Inuit Organizations to work together and constructively resolve any disagreements in the HACCS.

During the regular meeting held on December 9, 2021, the Government of Nunavut presented the revised HACCS and made submissions on consultation with co-management partners. The consultation report stated that the Government of Nunavut organized two conference calls with co-management partners on April 1 and July 27, 2021. The three Regional Wildlife Organizations, NTI, NWMB staff, and seven HTOs (Cambridge Bay, Kugluktuk, Baker Lake, Kinngait, Igloodik, Resolute Bay, and Grise Fiord) attended the consultation meetings. The consultation report also stated that the Government of Nunavut presented revisions to the HACCS during the conference calls, and co-management partners present had the opportunity to ask questions and provide feedback. The Board noted that in addition to and following these consultation meetings, the Government of Nunavut distributed consultation packages and letters requesting additional feedback on the



HACCS from co-management partners on March 19 and October 1, 2021. The Board also noted that the Government of Nunavut postponed plans to submit the HACCS to the NWMB in September of 2021 to provide more time for feedback from co-management partners.

However, the Board also heard and considered requests from Kitikmeot Regional Wildlife Board and Qikiqtaaluk Wildlife Board to delay decision-making until all HTOs in the Kitikmeot and Kivalliq regions have been engaged. The KRWB stated “that the proposal is very technical and requires more discussion and engagement with Kitikmeot communities to fully understand the system.”

In the end, the Board determined that given the evidence of follow-up engagement presented by the Government of Nunavut, the Board was able to proceed with making a decision on the HACCS.

There were concerns the 2019 FQS was a complicated document to understand. The HACCS has undergone changes to improve its structure and content, though there is room for improvement. The HACCS is written in plain language that is easier to understand. The efforts by the Government of Nunavut to include examples in sections (with calculations) may facilitate understanding of credits calculations and quota adjustments in different harvest scenarios. The two flow charts with annotations included in the HACCS<sup>2</sup> add clarity on credit use, credit exchange processes, and the role of co-management partners like the RWOs. The explanations provided in some sections have added detail and helped clarify the Government of Nunavut's rationale, especially in areas where co-management partners have raised concerns during consultation meetings, such as the issue of survival kills counting towards the TAH. The Board determined the changes to the HACCS in this version accommodate some concerns raised by co-management partners. However, there remain other unresolved concerns (such as DLPK and credit resets) that may prove challenging to administer when implementing the HACCS.

As the third harvest season (2022/2023) approaches under the 2019 FQS, the NWMB recognizes the need for a polar bear harvest administration system in Nunavut for the 1:1 sex-selective harvest ratio. On the basis of the simplified credit administration presented in the HACCS, the Board determined the current version of the HACCS is an improvement on the 2019 FQS in making its decision. As we proceed to implementation of the HACCS, the

<sup>2</sup> HACCS, pgs. 9, 10



NWMB will continue to make specific decisions on applications submitted to it on a case-by-case basis, including establishing, modifying or removing TAH or NQL.

### ***Recommendations for Collaborative Improvement to the Nunavut Polar Bear Harvest Administration***

The Government of Nunavut's submissions presented the HACCS exclusively as a polar bear administration tool for the NWMB's consideration. The Board is not aware that the Government of Nunavut provided notice or consulted with Inuit on potential rights limitations in the form of NQL if the HACCS is approved. Nevertheless, the Board considered the concerns raised by co-management partners through oral and written submissions that warrant attention, and specifically raises two issues in the paragraphs below.

Defence of life and property kills (defence kills) are counted as part of the TAH in the HACCS. The NWMB has heard Inuit frustrations about defence kills being counted in the TAH. The Government of Nunavut has submitted that not accounting for defence kills would interfere with sustainable harvest principles. The Government of Nunavut also argued that defence kills, like resetting credits to zero, are intended to enhance sustainable populations, which will facilitate Inuit harvesting opportunities in the future. Inuit submit that defence kills happen in unusual and sometimes life-threatening circumstances, they are not intentional harvests, and they should not be counted in the community TAH. By counting defence kills in the TAH, Inuit submit there are reduced harvesting and cultural expression opportunities, particularly in communities that experience problems with polar bears. The NWMB recommends exploring alternative options to count defence kills that takes Inuit concerns involving human-polar bear conflicts.

The HACCS states that a community's credits be reset to zero when a new TAH is established. The NWMB has heard Inuit oppose resetting credits to zero under those circumstances. The NWMB understands the Government of Nunavut's submission that resetting credits to zero when a new TAH is established avoids "double counting" of polar bears because the unharvested bears (credits) are counted in the new population estimate. Inuit organizations submit that resetting credits to zero unfairly removes earned credits and penalizes stewardship. The Board recommends the Government of Nunavut and co-management partners continue to work together towards a fair and acceptable alternative to resetting harvest credits to zero when a new sub-population TAH is set.

Given the complexity of polar bear credit administration, timely and accurate credit status information is relevant. The NWMB has heard concerns about finding out a community's





