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July 27th, 2012

Peter Kusugak
A/Chairperson
Nunavut Wildlife Management Board

Sent by email: receptionist@nwmb.com

Re: Written hearing of the Nunavut Wildlife Management Board to consider the proposed 2012/2013 level of total allowable harvest (TAH) for the Western Hudson Bay polar bear subpopulation in the Nunavut settlement area

Dear Mr. Kusugak,

Thank you for providing WWF with the opportunity to provide input to the decisions being made by the NWMB to support long-term sustainable wildlife populations in Nunavut.

We share the same interests as the Government of Nunavut (GN) and the Nunavut Wildlife Management Board (NWMB), in ensuring healthy wildlife populations in Nunavut over the long term. We also recognize the importance of polar bears for Inuit traditional use, as well as the opportunities that exist for communities to benefit from guided hunting opportunities and the sale of products. Moreover, we recognize that, with the appropriate monitoring and regulations in place, hunters can be the best advocates for and practitioners of long term conservation.

As well, we recognize the GNs commitment to sustainable management of polar bear subpopulations, including the 2011 aerial survey of the Western Hudson Bay subpopulation. We note that efforts are currently underway to finalize a new mark and recapture estimate and to compare results from the aerial survey with mark recapture methods to understand how these different survey techniques can inform each other, with a view to generating the best available information. Additionally, aerial survey estimates from neighboring Southern Hudson Bay will also become available in the same time frame. These studies, combined with the recently published Foxe Basin aerial survey report, will provide communities and management authorities with a better understanding of the entire Hudson Bay system.

There continues to be concern – among scientists and managers, as well as within communities – about the impacts of climate change on the behaviour and long-term prospects of polar bears at the southern margin of their range.

We also note that polar bear hunting in Canada is coming under increased international scrutiny and criticism. Indeed, some groups are already calling for polar bears to be up-listed to Appendix 1 at the next Conference of the Parties in 2013, and there are strong indications that one or more Range States will bring forward such a proposal. Let me assure you that WWF does *not* believe that the Appendix 1 criteria are met at this time, and so WWF does not support this proposal. Nevertheless, the proposal is gaining momentum, and actions taken by management agencies over the coming months are likely to influence the decisions taken by CITES members regarding whether or not to support the up-listing of polar bears.

Under these circumstances, we recommend that the most prudent approach would be for the previous year's total allowable harvest of 21 bears to remain unchanged.

Maintaining a stable TAH would allow for soon to be available information to be incorporated into Western Hudson Bay management decisions. This would send an important signal to the international community at this sensitive time, that management authorities in Canada are maintaining a "steady hand on the tiller" when it comes to polar bear management, and avoiding decisions that might be perceived (whether fairly or not) as rash.

Thanks once more for giving us the opportunity to provide input on this important decision, which will be closely scrutinized by nations around the world who are concerned about the long-term effects of climate change on polar bears.

Sincerely,



Gerald Butts
President and CEO
WWF-Canada