



The final revised management plan will replace the current MoUs and implemented once approved. Because the QWB's previous submission has been largely ignored in our opinion, it will probably be impossible to revise sections of the plan upon request by HTOs or RWO to actually meet the needs of the communities in future, if the current revised plan is approved. That leads the QWB to call for rejection of the revised plan at this time.

On the attached pages, you will find more specific comments on the revised Plan itself, in case the NWMB or DOE may at some point decide to address them in demonstrable and significant ways.

Sincerely,

James Qillaq  
Chairperson, Qikiqtaaluk Wildlife Board

cc. 13 HTOs in Qikiqtaaluk region  
Aluki Kotierk, President, Nunavut Tunngavik Incorporated  
Stanley Adjuk, Chairperson, Kivallik Wildlife Board  
Joe Ashevak, Chairperson, Kitikmeot Regional Wildlife Board  
Department of Environment, Government of Nunavut

## **Preliminary Comments on the revised Nunavut Polar Bear Co-Management Plan**

Qikiqtaaluk Wildlife Board

Submitted to the Nunavut Wildlife Management Board

May 19, 2017

The following comments are preliminary in nature. The Qikiqtaaluk Wildlife Board (QWB) reserves the right to make additional comments and recommendations, pending additional information and opinions that may arise from QWB members and HTO members in Qikiqtaaluk Region, or in response to other co-management partners.

1. In the QWB's 2015 submission to the Nunavut Wildlife Management Board (NWMB), we identified that one of its top priorities was for the Nunavut Department of Environment (DOE) to specify actions that it will take to improve its communication with the co-management partners and Inuit in general, to allow more engagement of stakeholders, and to foster greater cooperation with its co-management partners.

During the intervening 16 months before resubmitting its revised Plan, DOE did not engage the QWB to develop such actions and incorporate specify actions into the Plan to the best of our knowledge. In our opinion, that is a demonstrable failure by DOE to directly address one of the QWB's highest priorities.

Instead DOE have the following actions listed; all of which are overly vague, of inadequate priority, and most are far too long or unclear in their timelines, in the QWB's opinion:

"9.4 Develop a communications plan and education materials for bear safety", Moderate priority, Timeline: Within 3 years"

"9.3 Seek to build capacity in all co-management organizations to better participate in regulatory review processes", Moderate priority, Timeline: Ongoing"

9.5 "Build capacity in HTOs to provide support and participation in research projects", High priority, Timeline: Within 3 years

In addition, during the March 2017 regular and in-camera NWMB meetings, representatives of DOE spoke very strongly and at length against further in-person public hearings on a Plan that is very important to Nunavummiut. This is further continuing evidence that DOE does not truly appreciate the

needs of members of HTOs and other Inuit to present and be listened to by traditional means.

2. In the QWB's 2015 submission to the NWMB, we identified that a second top priority for the revised Plan to develop with all co-management partners very clear plans to collect Inuit Qaujimagatuqangit (IQ) about polar bear in Nunavut and to develop methods to substantively incorporate IQ into future management of polar bears.

The QWB devoted over 2 pages of our 2015 submission to this topic! That is a very clear expression of how important this issue is. We will not repeat all that here again.

During the intervening 16 months before resubmitting its revised Plan, DOE did not engage the QWB in an effort to develop specific and substantial actions for the collection and development of IQ about polar bears and their management. In our opinion, that is a demonstrable failure by DOE to directly and seriously address yet another of the QWB's highest priorities.

In the revised Plan, we did not see any clear and high priority actions on this topic; only vague objectives without priority assignments, like: 8.2.1 "Improve and continue gathering and archiving IQ in relation to polar bears and their habitat" and 8.2.2 "When possible, a concurrent IQ study will be conducted to complement the population inventory."

This is unsatisfactory in our opinion. Elders pass away on an on-going basis. Each passing is a critical loss of knowledge. The QWB has never envisioned that the value of IQ collection and research is dependent on the timing of DOE's scientific inventories. Apparently, DOE does not see IQ as being of value in its own right.

Independently, QWB has taken steps to further investigate and has begun to develop an applicable IQ strategy. From 1980s through the early 2000s, viable, scientifically peer-reviewed and published IQ research methods and management strategies were successfully developed and implemented in conjunction with South Baffin caribou. That IQ work included but was not limited to: historical and current distribution and abundance knowledge (as expressed by Inuit), ecology and habitat relationships over a period of 90 years, plus reliable and subsequently proven concepts and predictions by Inuit, even including an IQ-based management plan (that was not implemented). A similar strategy and methodology can be implemented for polar bear populations in Qikiqtaaluk.

Now, the QWB calls on DOE to commit to providing significant financial resources to fully enable the QWB itself to build and lead a team of experts and future trained Inuit to develop and implement an on-going polar bear IQ research program that in future will provide significant input to a series of community-based and sub-population-based management plans. We call on DOE to commit to funding this QWB-led program in the Nunavut Polar Bear truly-Co-Management Plan, as a high priority to begin by October 2017.

3. In the QWB's 2015 submission to the NWMB, we called for a section in the plan on the dangers of polar bears, to ensure that the plan speaks to the very real danger that polar bears pose to people.

We note that in the Introduction of the revised Plan that DOE now recognizes that Inuit have seen that most polar bear populations are increasing, while science seems to see that most populations are either stable or declining. We believe that the scientific evidence for such conclusions is weak, for example, as evidenced by the recent change in the interpretation of the trend of Baffin Bay bears dating back to 2012-13.

In the Introduction of the revised Plan, it also states that the focus of polar bear management supposedly now shifts to maintaining, or reducing numbers in areas where public safety is a concern and/or where there are detrimental effects on the ecosystem due to increased numbers of polar bears. However, there appears to be little follow through in the rest of the document.

For which populations does this new focus apply?

In our reading, the Plan does not give new and clear management objectives in section 8.1.3, either in general or for specific populations that comply with this supposed new focus.

For example, eliminating sex-selective harvest is stated as being dependent on status, trend **and** management objective. Among the 3 stated management objectives, there is no option to allow a decline to continue through harvesting in a case where there may be public safety concerns. Accordingly, the Plan states that once a decline is detected, the TAH **has** to be reduced, and this requirement is not made contingent on issues of public safety!

A table(s) is needed to show the HTOs and RWOs what the full array of TAH, trend and management objectives that may be considered.

Serious and sincere engagement by DOE of the stakeholders is required to set population objectives based on public safety and ecosystem conditions, and IQ is critical to develop and negotiate such objectives.

Further, the revised Plan presents the issue of public safety from a bear-centered view, most often as DLPK. That is as a killed bear.

References to "fear" felt by Inuit are missing, as are words like "danger" and "attack", words which QWB purposely used in its 2015 submission because they properly reflect the reality in the communities. It appears to us that DOE does not take this issue and reality seriously!

Related to this, is the issue of: "How many bears are enough? How many are too many?" And "What are the target population sizes desired by biologists?"

Inuit have been asking these questions for decades without any substantial replies giving clear targets!

As climate changes, bears may be moving toward communities, so there could be a growing problem. Inuit know that polar bears are highly adaptable animals, which can deal with highly varied and changing ecological conditions. They are adapted to climatic conditions of southern Hudson Bay to Kane Basin and the Canadian High Arctic Islands. Inuit know the adaptability of bear, they respect bears greatly for this adaptability. Just because bears may change in physical condition, there is no evidence that we know of that proves that populations will decline as a result. And thus, there is no evidence that TAHs should be reduced because of climate change or changing condition of bears. But that is the implication whenever governments and their biologists talk about climate change.

On the other hand, Inuit recognize that climate change is more likely to bring bears into closer proximity to humans, causing public safety issues. While bear populations remain resilience to population declines in the face of climate change, in the opinion of knowledgeable Inuit.

The Plan must identify actions that WILL be taken to develop target population levels for all populations in Nunavut. These target population levels must be developed in close and full collaboration with ALL HTOs and RWOs, and public safety issues must be incorporated into the setting of population targets.

As already stated by the QWB in 2015, sections on public safety must be added for background information and in terms of action items. In addition,

the concept of human-tolerance for polar bears in and around communities needs to be an integral component for developing population target levels.

As well, a much stronger and more serious commitment to on-going community-based public-safety monitoring and deterrent programs with very clear and measurable actions must be added to the Plan.

4. The Plan should address how DOE will advocate and justify for removal of polar bears as “special concern” under SARA, removal of all negative NDFs by the federal government, and allowance of unsold hides when negative NDFs are removed. Clear action items on these issues are required.
5. The analyses and interpretation of study results must become an open and collaborative process. RWOs must be able to assign knowledgeable representatives to collaborate in the interpretation of the results of surveys and other scientific studies. These representatives may be traditionally trained Inuit and scientifically trained persons as the RWOs may chose.

After the survey of the Baffin Bay sub-population, the PBTC, PBAC and scientific Authority could not finalize how to interpret with the results. Three communities are still waiting 5 or 6 years after the survey was completed. This situation is wholly unacceptable, TAH decisions must be more efficient!

Future studies require guaranteed publication of results in a timely manner. As a high priority, the recommendation of new TAHs must be dealt within no more than 2 years after the completion of field surveys or studies, and within 1 year if management objectives change in the absences of new surveys.

As well, once the QWB is funded to undertake IQ research, the results of IQ research must be equitably incorporated into all management decisions with comparable timelines, to enable more efficient decision making of management objectives, target population levels and TAH determinations.

6. With support from NTI, the three RWOs have advocated to completely abolish the intrusive science or drugging any polar bears. In our opinion, section 8.2.2 (Page 25, 5<sup>th</sup> paragraph) should be completely removed.