



Via Email

May 26, 2014

Nunavut Wildlife Management Board  
P.O. Box 1379  
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Email: receptionist@nwmb.com

**Re: M'Clintock Channel Polar Bear TAH**

To Whom It May Concern:

The Center for Biological Diversity thanks you for this opportunity to comment on the proposed Total Allowable Harvest (“TAH”) increase for the M’Clintock Channel (“MC”) polar bear subpopulation. The Kitikmeot Regional Wildlife Board has requested a 600% increase in harvest, from 3 to 18 bears. As explained below, we request that the NWMB reject this proposal.

The most recent MC subpopulation abundance estimate, from a 2000 survey, is  $284 \pm 59.3$ , which was substantially lower than previous estimates from the 1970s of 900 bears.<sup>1</sup> Scientists indicate the subpopulation’s depletion was caused by the “historical level of harvest.”<sup>2</sup> In response, the United States banned MC imports in 2001, finding the subpopulation to be “severely depleted” and harvest quotas “unsustainable.”<sup>3</sup> Nunavut subsequently reduced harvest to 3 bears. However, the Polar Bear Specialist Group (“PBSG”) noted that “even low harvests (3-4 bears per year) in MC will extend the time required for recovery to 50 years or more.”<sup>4</sup>

The MC polar bear subpopulation remains “reduced,” and we are not aware of any new scientific information indicating the population has fully recovered or confirming an increasing trend.<sup>5</sup> The MC subpopulation is also threatened by climate change. While scientists predict that polar bears may persist in the Archipelago Ecoregion longer than in other areas, populations are expected to decline substantially due to decreasing sea ice.<sup>6</sup> In fact, recent science shows that sea-ice

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<sup>1</sup> Taylor, M.K., et al. 2006. Demographic parameters and harvest-explicit population viability analysis for polar bears in M’Clintock Channel, Nunavut, Canada. *Journal of Wildlife Management* 70:1667-1673;

Obbard, G.W., et al. 2010. Polar Bears: Proceedings of the 15th Working Meeting of the IUCN/SSC PBSG, Copenhagen, Denmark, 29 June-3 July 2009.

<sup>2</sup> Aars, J., et al. 2006. Polar Bears: Proceedings of the 14th Working Meeting of the IUCN/SSC PBSG, 20-24 June, 2005, Seattle, WA, USA.

<sup>3</sup> 66 Fed. Reg. 1901 (Jan. 10, 2001).

<sup>4</sup> Aars (2006).

<sup>5</sup> PBSG Status Table (2013); Canadian Polar Bear Technical Committee Status Table (2012). While traditional knowledge indicated that bears move between the MC and Gulf of Boothia subpopulations, a recent study demonstrated genetic differentiation and low gene flow. Campagna, L., et al. 2013. Extensive sampling of polar bears (*Ursus maritimus*) in the Northwest Passage (Canadian Arctic Archipelago) reveals population differentiation across multiple spatial and temporal scales. *Ecol. Evol* 3: 3152-3165.

<sup>6</sup> Amstrup, S.C. et al. 2007. Forecasting the rangewide status of polar bears at selected times in the 21st Century. USGS Alaska Science Center, Anchorage, Administrative Report.

loss in the Canadian Arctic Archipelago has been significant during the summer months in recent years,<sup>7</sup> and the oldest ice types are disappearing in the region just north of the Archipelago.<sup>8</sup> The rate of mass loss of ice caps and glaciers of the Canadian Arctic Archipelago increased three-fold between 2004-2006 and 2007-2009,<sup>9</sup> another indicator of the region's vulnerability to ice loss from global warming.

We understand that a new assessment of the MC subpopulation is planned this year, but no results have been released. Accordingly, because the MC subpopulation remains reduced and susceptible to climate change and because no new science supports an increased harvest, we encourage the NWMB to act with precaution and reject the proposed TAH increase.

Sincerely,



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<sup>7</sup> Howell, S. E., et al. 2010. Extreme low sea ice years in the Canadian Arctic Archipelago: 1998 versus 2007. *Journal of Geophysical Research* 115:C10053; Tivy, A., et al. 2011. Trends and variability in summer sea ice cover in the Canadian Arctic based on the Canadian Ice Service Digital Archive, 1960–2008 and 1968–2008. *Journal of Geophysical Research* 116, C03007.

<sup>8</sup> Maslanik, J., et al. 2011. Distribution and trends in Arctic sea ice age through spring 2011. *Geophysical Research Letters* 38, L13502.

<sup>9</sup> Gardner, A.S., et al. 2011. Sharply increased mass loss from glaciers and ice caps in the Canadian Arctic Archipelago. *Nature* 473: 357-360.



