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Date: Aug 2, 2013

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From:

Adamie Padlayat Mark O'Connor

Sarah Lisa Kasudluak Lorrie Kasudluak

urgent confidential as requested original to be mailed

Ref: Submission

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← 25, 2013

לארט אַדְמִירָלֶר
 דֵּרְכָּה לְאַרְבָּה
 מְגַדֵּל בְּלִיאָנָה יְהוּנָה
 דְּמִינָה אֲמִינָה. 4ְּסִינָה 1379
 דְּמִינָה, מְגַדֵּל חֹאָהוּ



לְאַרְבָּה: אַדְמִירָלֶר בְּלִיאָנָה נְמִינָה NMWB-ה' דְּמִינָה
 מְגַדֵּל בְּלִיאָנָה אֲמִינָה 'בְּלִיאָנָה' בְּלִיאָנָה
 דְּמִינָה בְּלִיאָנָה Fox Basin-G מְגַדֵּל מְגַדֵּל מְגַדֵּל.

לְאַרְבָּה:

אַדְמִירָלֶר בְּלִיאָנָה (NMRWB) פָּאוּרָה: אַלְבִּין כָּרְסִיס
 מְגַדֵּל בְּלִיאָנָה. אַרְבָּה אֲמִינָה בְּלִיאָנָה (QWB) כִּירְבָּה
 אַדְמִינָה בְּלִיאָנָה בְּלִיאָנָה אֲמִינָה בְּלִיאָנָה Fox Basin-G
 מְגַדֵּל.

אַדְמִינָה בְּלִיאָנָה בְּלִיאָנָה אֲמִינָה NMRWB-ה'
 מְגַדֵּל בְּלִיאָנָה אֲמִינָה בְּלִיאָנָה אֲמִינָה
 מְגַדֵּל NMRWB-ה' אֲמִינָה בְּלִיאָנָה בְּלִיאָנָה
 11. 2013-ה' אֲמִינָה אֲמִינָה אֲמִינָה
 אֲמִינָה אֲמִינָה אֲמִינָה אֲמִינָה אֲמִינָה
 אֲמִינָה אֲמִינָה אֲמִינָה אֲמִינָה אֲמִינָה;

אַדְמִירָלֶר בְּלִיאָנָה
 4ְּסִינָה 433, אַמְּבָעָה, QM, JOM 1MO
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NMRWB-ה' פָּאוּרָה, אַדְמִינָה, מְגַדֵּל בְּלִיאָנָה
 אֲמִינָה, אַרְבָּה, מְגַדֵּל בְּלִיאָנָה, אֲמִינָה
 מְגַדֵּל בְּלִיאָנָה, אֲמִינָה.

R. Macmillan

רְאַבְּרָהָן
 דֵּרְכָּה לְאַרְבָּה
 אַדְמִירָלֶר בְּלִיאָנָה

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July 25th, 2013

Manasse Audiaklak
A/Chairperson of the
Nunavut Wildlife Management Board
Inuksugait Complex, P.O. Box 1379
Iqaluit, NU, X0A 0H0



RE: Nunavik Marine Region Wildlife Board submission to the public hearing of the NWMB concerning the level of regional total allowable harvest for the Foxe Basin polar bear sub-population in the Nunavut Settlement Area.

Mr. Audiaklak,

The Nunavik Marine Region Wildlife Board (NMRWB) appreciates this opportunity to share its views on the Qikiqtaaluk Wildlife Board's (QWB) request to increase levels of total allowable harvest for the Foxe Basin polar bear sub-population.

Please confirm reception of this document and of its inclusion within the NWMB's public hearing registry. The information and positions detailed within this submission will be explained in further detail by the NMRWB during your September 10-11, 2013 public hearing in Iqaluit. Should you or your staff require clarification on any of the information contained herein, please do not hesitate to contact our staff at the coordinates below:

Nunavik Marine Region Wildlife Board
 P.O. Box 433, Inukjuak, QC, J0M 1M0
 Phone: (819) 254-8667 | Fax: (819) 254-8816
 Email: moconnor@nmrwb.ca

On behalf of the NMRWB, I thank the Nunavut Wildlife Management Board in advance for giving full consideration to the information presented herein when reaching a decision on this matter.

Sincerely,

R. Tookalak
 Robbie Tookalak
 A/ Chairman
 Nunavik Marine Region Wildlife Board

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The Foxe Basin polar bear sub-population

Having reviewed the Government of Nunavut's Foxe Basin (FB) polar bear aerial survey report, the Nunavik Marine Region Wildlife Board (NMRWB) considers this sub-population to be healthy. While we caution a direct comparison of the latest population estimate with those obtained previously through mark-recapture studies, it appears based on these findings and on the observations of Inuit, that the population has at least remained stable under recent harvesting pressures.

However, given that no time-series information is available to validate the findings of the aerial survey the NMRWB recommends that any increases above current harvesting levels (Nunavik and Nunavut combined) should be slight. This is especially important considering the management actions being undertaken to ensure the sustainability of harvests in Nunavik (see below).

Given the shared-nature of this sub-population, between Nunavut and Nunavik communities, it is imperative that the NMRWB and NWMB have similar management objectives (e.g. target population size, time to reach target population, etc.) going forward. Although the NMRWB currently has not established its management objectives for Foxe Basin polar bears, we are open to working with the NWMB to establish agreed-upon management objectives and to determine the overall level of harvests necessary to meet these objectives. Such an exercise should be carried out before the NWMB makes a decision regarding the QWB's request to increase the total allowable harvest (TAH).

Harvesting by Nunavik Inuit

As indicated in the NWMB's public hearing notice, you must consider harvests by Inuit from Puvirnituq, Akullvik, Ivujivik and Salluit when rendering a decision regarding TAH of FB polar bears (harvest statistics are maintained by the Quebec government). Since the NMRWB has yet to consult these communities, we will not comment on their needs; doing so may be done by the Makivik Corporation on behalf of Nunavik Inuit, or by the *Regional and Local Nunavimmi Umaajilirijiit Katujj/qatigilinnnga* (RNUK and LNUKs respectively).

Historically no limits have been imposed on the number of FB bears harvested by Nunavik Inuit, in accordance with the *Guaranteed Harvest Levels* established under s. 24.6.2 of the James Bay and Northern Quebec Agreement. It should be noted that sport-harvesting is currently not permitted in Nunavik.

The management of Foxe Basin polar bears in Nunavik

Harvesting, by Nunavik Inuit, is presently regulated by the government of Quebec. All polar bears that are harvested must be registered; a tag affixed to the pelt attests that this requirement has been met.

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Following a request from the Minister of Environment Canada in January 2012, the NMRWB is undertaking the establishment of a comprehensive management system, including levels of total allowable take, for all polar bear sub-populations occurring in Nunavik based on an understanding that the absence of harvesting limits poses a potential conservation concern.

A number of issues have led to delays in this process, however the establishment of a comprehensive polar bear management plan remains a priority for the NMRWB. It is anticipated that a first hearing on Southern Hudson Bay polar bears will be held this fall. Additional hearings for FB and Davis Strait will be held as soon afterwards as is feasible.

Impact of the NWMB's decision on polar bear management in Nunavik

Any decision of the NMWB on this matter will likely be associated to a management objective for the FB sub-population as a whole. In other words, the NWMB will determine a level of TAH that is Nunavut's portion of the overall number of bears that can be harvested while either maintaining the population at current levels, allowing it to increase, or to reducing the number of bears in FB, depending on the management objectives decided upon. Because FB is a shared sub-population the NWMB's decision will to a certain extent limit the number of bears that can be hunted by Nunavik Inuit to meet the same population objective.

Should both Boards be managing FB polar bears in hopes of achieving the same population objective, it is important that the NWMB's decision be such that remaining harvests be sufficient not only to meet the basic needs of Nunavimmiut, but also to allow the NMRWB to put in place a management system that can be applied feasibly at the community level. Since no consultations or hearings have taken place towards this management system, it remains premature for us to advance how many bears would be sufficient to attain this purpose.

Whatever the outcome of the NMWB's consideration, we trust that your decision will explicitly describe the considerations that you have given to the NMRWB's efforts to put in place a management system that will limit harvesting by Nunavik Inuit. Given the potential implications of a TAH increase on Nunavik Inuit harvesting, we trust that the NWMB will explore whether alternatives to address the growing number of defense kills, other than the QWB's proposal to increase the TAH are feasible.

Concluding Remarks

The NMRWB empathises with the request put forward by the QWB as the issue of defense kills and the presence of bears in or near communities is a growing issue in Nunavik as well. Given that, the position that we are putting forward seeks collaboration between the NWMB and the NMRWB in determining a single management objective for this subpopulation, and to subsequently ensure that the resulting harvest levels meet the needs of both Nunavut and Nunavik Inuit.