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Qikiqtaaluk Wildlife Board

October, 28, 215

Mr. Ben Kovic, Chair Nunavut Wildlife Management Board Iqaluit,NU XOA 0H0 Sent by email to: reception@nwmb.com

RE: Qikiqtaaluk Wildlife Board's response to the GNs proposed Polar Bear Management Plan.

The Qikiqtaaluk Wildlife Board appreciates this opportunity to provide a written submission on the Government of Nunavut's Polar Bear Management Plan.

Overall, QWB supports the development of a new Management Plan for Polar Bears. As Chair of QWB, I am all too aware of the lasting legacy of the MoU's. This was discussed throughout the Qikiqtaaluk leg of the Nunavut wide consultation tour, often with some frustration and anger. There is a sense that managing polar bears in Nunavut requires more direct input from people and communities, more so than what the MoU's was designed to provide.

QWB would like to recognizes the GN's effort in working with co management partners in the development of this plan. The GN sought to include the various co management partners early on its development and completed a Nunavut wide consultation tour on this topic. These were necessary actions and QWB appreciates being part of the early discussions and the Qikiqtaaluk leg of these consultations.

This submission is not intended to critique the management plan itself, but rather, raise questions about the implementation of this plan. QWB anticipates some difficulties in implementing the proposed plan using the structures and processes currently in place. Therefore, QWB feels it is necessary to raise these concerns formally. It would be unfortunate to approve a plan that cannot be implemented within the current management structure.

We have 9 points we would like to raise.

1) The goals of the plan are 1) Improved Communication, 2) Stakeholder Participation, 3) Cooperation. These are valid and important goals for this plan. As a regional wildlife organization that works with 13 HTOs, we appreciate that improvements on these matters can be improved. QWB wonders what actions the GN will be putting in place internally to improve its communication, allow more

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engaging stakeholder participation and foster greater cooperation amongst comanagement partners?

2) The plan is committed using science and improving its engagement with Inuit experience and IQ. This is a necessary work for the territory as a whole and for all species.

It is clear that this new management plan sees its future development through IQ. It provides IQ with a lot of space and continually recognizes its importance. On paper, this is an important argument to make. In action, this will require a lot of work, specifically around engagement and ongoing support directly with knowledge holders.

As an organization that works with the HTOs directly, we know HTOs have been calling for better engagement with Inuit knowledge and experience. As we understand it, it is a call for experience and knowledge to be share, but also the freedom to engage with the process and co management partners more directly. We would like to address this in two parts: the plans renewal/review dates, and IQ research itself.

First to the renewal process for the plan itself. Does the GN plan to support a review process that involves all co management partners and one that is open to critiques raised by community members.

Related to IQ research: Since the creation of Nunavut the goal of incorporating Inuit knowledge into policies and procedures has been constant. Inuit have been making this call for as long as wildlife management became about enforcement. And yet, no structures have been developed to collect IQ and Inuit feedback in a way that is comfortable for communities to share, and that is in a form comanagement partners can use. QWB believes it is now time for all comanagement partners to work together to develop a system for continual IQ collection and reporting.

To begin collecting the IQ needed to move this proposed plan into the future, there needs to be a method of collection, sharing, remuneration and reporting developed. HTOs and their membership require an administrative support network that will allow them to then do the work of collecting IQ. What also must be developed is a means for getting this information to co management partners,

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the effective cataloging of information and guidelines for the use of IQ information collected by co management partners. There must also be a process for looping in new information into the decision making process, but also verifying information as well.

In light of a management plan that relies heavily on IQ, QWB wonders what strategies the GN, and all co management partners, have in order to meet the IQ specific needs outlined in this plan. This is a responsibility that is larger than a council of elders or a single IQ coordinator. It requires a Nunavut wide strategy that includes all co management partners. This is needed because no useable methodology for collecting IQ from beginning to reporting has been developed. Not spending time and committing resources to this results in nothing more than having a plan that speaks of the importance of IQ but does not act from it.

Perhaps no where is this work more pressing than when considering polar bear sub populations and boundaries. QWB understands that polar bear boundary discussion occur at the PBTC and are scientific in nature. We are also aware that boundary related decisions are based on collaring data (page 15). The question we would raise is where does this leave Nunavut communities? In what ways does the GN anticipate informing and engaging the communities on these important matters. These are practical questions that must be considered and some thought must be put into a response as both the plan itself, and the consultation report stress the importance of changing existing polar bear boundaries.

Finally, in relation to IQ and science, we encourage the GN to consider the tension of using both systems within the department itself. We raise this question based on our experience with the Foxe Basin subpopulation. As you are aware, QWB requested an increase for this subpopulations TAH. After a public hearing, NWMB provided an initial recommendation to the GN. The GN rejected the initial recommendation and in a letter dated May 29, 2014, provided its rationale for that rejection. The rationale focused largely on the scientific data and population estimates connected to the MoU system. The letter also raised concerns about the validity of the mark and recapture system in developing accurate population estimates. This argument was present just months after a Nunavut wide consultation tour in which the delegates representing the GN presented to all communities this very system, and touting the value of this method in lieu of collaring. This contrast, the two arguments by the same department within a





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small timeframe is confusing at best, and it leads QWB to wonder which perspective the GN really supports. We feel it is necessary for the GN to find their own common ground on this matter and ensure the management plan reflects it.

- 3) QWB recommends that a section be included to the plan that highlights the dangers of polar bears, or explain how polar bears attack. This is necessary to ensure the plan speaks to the real danger polar bears pose to people. This will also interrupt the gentle or victim view the international community has on Polar Bears.
- 4) HTOs continue to state that investigations into defense kills do not occur as efficiently as the plan presents them. Polar Bear hides have been ruined and HTOs have not been active in claiming those damages. Does the department have a staffing plan and secured funds to address this matter? QWB staff are committed to ensuring HTO's follow up with claims for damaged hides.
- 5) QWB would argue that the focus of the plan will need to develop to not just focus on the polar bear as an autonomous being, but take a broader approach include polar bear habitat. For example, on page 19 of the plan, its states that if a decline in population is noted by science/local knowledge, then action to be taken will be to reduce the TAH. The concern is that in action, the plan focuses on the harvestors only.
- 6) QWB understands the GN is committed to on going polar bear research. Does the GN have a departmental plan to ensure it has the needed resources and staff to carry out the research schedule, ensure research analysis can occur, and an effective system for reporting back is in place?
- 7) QWB recommends that a comprehensive communications plan on this plan be developed. It would need to be a plan that is rooted in Inuktitut and developed not from the government perspective, but from the community perspective. As the GN was represented at the community consultation tour, as were members of the commangement partners, we believe a commangement approach to develop an appropriate communication plan would greatly inform the communities about this new management plan, and be an important catalyst in applying the plan within each community.

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- 8) Regarding the SARA listing, we would appreciate some clear indication on how many bears would be needed in order to remove the bears from the "special concern" listing, either by subpopulation, or the population as a whole.
- 9) Regarding compensation, QWB does wonder if the department can enforce compensation for the HTOs if a polar bear is killed. We understand that the management plan currently has provisions as it relates to research, and that IIBA's as it relates to mining companies, but what other cases, such as tourism? Instead of dividing these matters amongst different departments and offices, could the Department of Environment be the contact point for all polar bear matters for the GN?

Thank you for this opportunity,

James Qillaq, Chair Qikiqtaaluk Wildlife Board