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Daniel Shewchuk
Acting Chairperson, Nunavut Wildlife Management Board
P.O. Box 1379
Iqaluit, Nunavut, X0A 0H0

Via email: receptionist@nwmb.com

Dear Mr. Shewchuk:

Re: Comments on Nunavut Polar Bear Co-Management Plan

On behalf of WWF-Canada, thank you for the opportunity to submit comments on the Nunavut Polar Bear Co-Management Plan. We acknowledge the hard work from the Government of Nunavut (GN) that has gone into the drafting of this plan, including the many improvements from the previous draft, specifically the section on climate change and the addition of priorities and timelines for implementation.

We recognize the difficulty associated with drafting a management plan for such a wide-ranging species with multiple subpopulations and varying conservation perspectives. Few species elicit as wide a variety of viewpoints on the status, management goals, and future projections as polar bears, both within Nunavut and abroad. It is with these considerations in mind that we submit our comments on the co-management plan.

Section 2 – Guiding principles

The guiding principles for this plan are strong, and if adhered to, will ensure the proper management of polar bears in Nunavut. Of particular note is the need to ‘ensure that subpopulation information is available for timely conservation decisions and long-term sustainability’, and the acknowledgement that a ‘lack of certainty will not be a good reason for postponing reasonable or precautionary conservation measures’. In order to properly implement these two guiding principles, the GN will need to continue to invest heavily in polar bear monitoring and fulfill the survey schedule as listed in Appendix D. Obtaining updated population estimates for the Norwegian Bay, Northern Beaufort Sea, and Lancaster Sound subpopulations, all scheduled for assessment in 2018, is an especially high priority.

Section 5.3 – Legislative frameworks and agreements

Interjurisdictional agreements between Nunavut and neighboring provinces, territories and nations will be crucial to the success of both the Nunavut co-management plan, and the federal Species at Risk Act plan. We urge the GN to treat the renewal, and where necessary, development of interjurisdictional agreements with the highest priority.

The implementation of this plan will also need to consider the Circumpolar Action Plan (CAP) for polar bears, signed by the Government of Canada in 2015. While not a direct signatory, many of the actions in the CAP will be the responsibility of the GN. WWF will be creating a scorecard to monitor the implementation of the CAP across the range of the polar bear, and we look forward to engaging with both the Government of Canada and the GN to highlight the successes of the CAP and identify areas in need of further investment.

Section 7.4.1 – Climate change

Climate change represents one of the best understood threats to polar bears, but also the most challenging threat to combat at the local level. This draft of the plan includes greater reference to the anticipated negative effects of climate change on bears from a scientific perspective. While the vast majority of subpopulations are currently stable, the future trends are an area of concern. It will be important to continue to monitor the effects of climate change on polar bears to test the varying hypotheses regarding polar bears and declining sea ice, using both Inuit Qaujimajatuqangit and science.

Section 7.4.2 – Denning

While some denning areas are currently protected in Nunavut, the identification and protection of additional areas will be a necessary action of this plan. Multiple stakeholders and many of the community delegates at the March 2017 Qikiqtani public hearing for the Nunavut Land Use Plan (NLUP) expressed a strong desire to protect additional denning areas by land use designations. In many ways, the NLUP is the ideal avenue to pursue denning area protections, as the areas are not permanent, can include only seasonal restrictions, and can be altered according to changing community needs or shifts in polar bear distribution. As this plan moves into the implementation phase, we strongly encourage the GN to continue to engage with the Nunavut Planning Commission (NPC) to assign Special Management Area status to all known polar bear denning areas in Nunavut that seasonally prohibit incompatible uses that could disturb denning bears during the denning season.

Section 7.5 – Population boundaries

The proper management of polar bears in Nunavut will require accurate management unit designations to maximize harvest opportunities while ensuring sustainable subpopulations. As sea ice continues to decline, changes in subpopulation structure and distribution are expected. Currently, collaring studies are the only means by which these boundaries can be assessed and remain a necessary aspect of polar bear management.

Section 7.8 – Trade

WWF does not support uplisting polar bears on the Convention of International Trade in Endangered Species (CITES), and publicly commented against the September 2015 proposal to list polar bears on Appendix 1. The development and implementation of both the Nunavut and federal polar bear management plans will strengthen the case against an Appendix 1 listing. However, further actions, such as assigning a Special Management Area land use designation to all denning areas, continuing to monitor subpopulation structure and distribution through collaring studies, and increasing investment

in attractant management and the development of deterrent techniques to minimize human-polar bear conflict will further strengthen the non-detrimental finding from CITES and maintain the international trade of polar bears.

Section 8.1.3 – Harvest reporting and monitoring

If the objective is to decrease or maintain the population, and the total allowable harvest (TAH) is increased, it is noted that ‘appropriate monitoring must be conducted as a follow-up to measure the success of the management action’. The scale of what is considered ‘appropriate monitoring’ in this provision should be at the very least broadly defined in this plan so that the response of the GN can be evaluated following such a decision.

Section 8.2.1 – Gaining knowledge

The GN should improve information reporting related to polar bears and bear-human interactions through better attendance at the Polar Bear Specialists Group working group on human-polar bear conflict, and by contributing all available data to the Polar Bear Human Information Management System (PBHIMS). The GN should also prioritize research into the effectiveness of conflict mitigation techniques and attractant management in communities in conjunction with the hamlets and Hunters and Trappers Organizations across the territory. These actions may increase the polar bear co-existence threshold of Nunavummiut and avoid situations where the TAH is increased to manage human-polar bear conflict, which could be negatively perceived in international fora.

Section 8.3 – Habitat management and environmental stewardship (Avatitinnik Kamatsiarniq)

The GN should work with co-management partners to lead the way on research quantifying the effects of disturbance from industrial development on polar bears, from an IQ and science perspective. In the absence of concrete information on this subject, incompatible activities that could disturb denning polar bears need to be seasonally prohibited through land use designations.

The Last Ice Area (LIA), located in the High Arctic adjacent to the islands of the Canadian Arctic archipelago, is the area where summer sea ice will persist the longest based on climate modelling. Regardless of the debate on the importance of sea ice to polar bears, it is likely that the vast majority of polar bears will follow the sea ice. The management of the LIA, as critical polar bear habitat, will be a very important aspect of future iterations of this plan.

Section 9 – Implementation of the Plan

It is understood that while this plan is prescriptive in some regards, many management actions will come down to case-by-case decisions from the Nunavut Wildlife Management Board and subsequent decisions from the GN Minister of Environment. It will be important for both of these bodies to recognize and consider each of the objectives of this plan and interjurisdictional and international commitments when making decisions.

We applaud the addition of priority-setting and timelines for the management actions of this plan. However, given the short timeframe (less than five years) and ongoing nature of many of these actions, we believe that more frequent progress reporting is necessary, especially in the initial stages of the

plan, we suggest an interim report be drafted two years after the plan is implemented to track the progress of the plan and identify areas of improvement.

Section 9.3 – Habitat management and environmental stewardship (Avatitinnik Kamatsiarniq) actions

One particular action that we feel is not sufficiently prioritized is the study of the effects of marine shipping and development of mitigation measures on polar bears. Industrial development pressure is high in the Arctic, and the current ten-year timeline does not address the need to better understand the effects of disturbance on polar bears in order to allow for much needed industrial development while mitigating the impacts to wildlife. This action needs to be elevated to high priority and a timeline of no more than five years, with work beginning as soon as feasible.

Section 10 – Plan Review

As the jurisdiction with the most polar bears in the country, Nunavut's plan will be the cornerstone of polar bear management in Canada. As noted above, an interim review should come after two years so that problems can be identified. This is a first generation plan, and a review will not be onerous. WWF will also conduct a review of the progress of the plan after two years, which we hope will be a productive exercise to identify roadblocks that need to be addressed before the 5 year review mark.

Concluding remarks

WWF-Canada is supportive of this draft of the Nunavut Polar Bear Co-Management Plan. We have suggested minor revisions for consideration by the NWMB and the GN in their final drafting of the plan. We have also included areas of emphasis and future actions that will be necessary during the implementation of the plan, and we look forward to continued discussions on these topics. We thank the NWMB and the GN for the opportunity to submit comments which we feel will improve the plan, and look forward to expressing our points and hearing from others at the hearing in June in Iqaluit.

Sincerely,



Brandon Laforest
Senior Specialist, Arctic Species and Ecosystems
WWF-Canada

- C.c. Jason Akearok, Executive Director, Nunavut Wildlife Management Board
- C.c. Vicky Sahanatien, Director, Wildlife Management, Nunavut Wildlife Management Board
- C.c. Sarah Spencer, Wildlife Management Biologist, Nunavut Wildlife Management Board