

**SUBMISSION TO THE
NUNAVUT WILDLIFE MANAGEMENT BOARD (NWMB)**

Regular Meeting No. RM 002-2020

FOR

Information: ☐

Decision: ☒

Issue: ***Advise GN to Follow Approved Procedures to Promptly Issue Polar Bear Credit Tags***

Background:

On October 16, 2019, the Government of Nunavut (GN) sent a letter (with appendices) to the Chairperson of the QWB explaining that the GN had updated the polar bear harvest credit calculation system, and that the NWMB had approved the proposed system on an interim basis.

Appendix B of the October 16, 2019 letter explains the NWMB-approved interim process for communities to receive tags for their accumulated credits, as follows:

5.8.2. Requests by communities to use credits to increase their annual recommended quota shall be made to, and approved by, the responsible RWO. The GN will verify and confirm the number of available credits.

On March 2, 2020, the QWB received a motion from the Sanikiluaq HTO requesting the QWB's approval to use 13 female and 16 male credits for harvesting. The QWB had checked on the number of credits available to Sanikiluaq and confirmed that the community had enough credits.

In an extraordinary step, outside the scope of the NWMB-approved system for requesting and approving use of available credits, the GN has refused to issue all of the duly requested and approved credit tags.

On April 7, 2020, the QWB and HTO received a letter from the GN Polar Bear Lab stating that on January 14, 2020, they had confirmed with the HTO that Sanikiluaq had 16.03 male and 14.97 female polar bear credits available. In that same letter, the GN expressed a conservation concern and asked that the HTO spread this amount of credits over 2-3 harvest years.

In subsequent correspondence, the QWB and HTO made two requests:

1. That the GN follow the NWMB-approved process as specified in the GN's October 16, 2019 letter and promptly issue the duly requested, confirmed and approved credit tags, after which the HTO and QWB could begin discussions on the timing of the harvesting.
2. That the GN guarantee that the TAH would not be reset and the credits zeroed for at least 3-5 years.

The GN refused to agree to these requests from the QWB and the HTO.

Instead, on April 16, 2020, the GN's Polar Bear Biologist wrote a letter stating the following:

1. *"... the department can release the number of tags that would not constitute a conservation concern without the involvement of the Nunavut Wildlife Management Board."*

QWB Comment: According to Appendix B, 5.6, "Credits accumulate for unused portions of the recommended quota or TAH." The process for issuing the credit tags to Sanikiluaq

as described in Appendix B, 5.8.2 was based on past harvesting below the TAHs that were previously approved by the NWMB. The 5.8.2 process, specified by the GN itself, for issuing credit tags does not involve the NWMB. Further, the described process does not enable the GN to unilaterally and retroactively modify either past TAHs or processes that the NWMB has already approved. If the GN or other governments do have such authority, then the RWOs and HTOs will have great difficulty trusting co-management processes going forward.

2. The biologist sent only 9 (4 females, 5 males) of the 29 duly requested, confirmed and approved credit tags.
3. *“Our department has requested that the Nunavut Wildlife Management Board make a decision over the use of the remaining 20 credits (9 females, 11 males) at their earliest opportunity.”*

QWB Comment: As stated above, the process described in Appendix B 5.8.2 related to issuing credit tags, based on past harvesting below NWMB-approved TAHs, does not involve the NWMB.

There is nothing in the interim credit system approved by the NWMB that allows the GN to take these actions. In the situation of a conservation concern, Appendix A and Appendix B 5.4 of the October 16, 2019 letter describe the following potential actions:

“If conservation concerns related to harvesting pressure on female bears arise, there may be a need to adjust the sex ratio to 2:1 at the subpopulation level. As such, the option to return to a 2:1 harvest sex ratio will be available, as and when TAH recommendations are submitted to the NWMB.”

“5.4. Subpopulation credits accumulate until a new TAH is determined. This may include a subpopulation inventory that has been conducted and a final abundance estimate result is produced. In some circumstances, a completed and finalized harvest risk analysis may also be conducted, or the Nunavut Wildlife Management Board recommends a change in TAH for other management purposes. Under these circumstances, all credits are set back to zero.”

To the best knowledge of the QWB, as of the May 4, 2020, the GN had not formally made new TAH recommendations for the Southern Hudson Bay polar bear sub-population to the NWMB.

The actions described in the GN's Polar Bear Biologist's letter of April 16, 2020 are not allowed based on the current knowledge of the QWB.

Recommendations:

The Qikiqtaaluk Wildlife Board recommends that the Nunavut Wildlife Management Board advises the GN to follow the interim procedures described in the GN's letter of October 16, 2019, including promptly confirming the number of available polar bear credits to either the RWO or the HTO as requested, and then promptly issuing all duly HTO-requested and RWO-approved credit tags that may be available. This should be done immediately for Sanikiluaq's request.

Prepared by: Michael Ferguson, Qikiqtaaluk Wildlife Board

Date prepared: May 4, 2020