

**Subject:** Re: Sanikiluaq credit use request

**From:** Michael Ferguson <wildlifeadvisor@niws.ca>

**Date:** 2020-04-07, 6:54 p.m.

**To:** PolarBearLab <polarbearlab@gov.nu.ca>, "qwbac@niws.ca" <qwbac@niws.ca>

**CC:** Lucassie Arragutainaq <sani@baffinhto.ca>, "Gissing, Drikus" <DGissing@GOV.NU.CA>, "England, Kate" <KEngland@GOV.NU.CA>, "Qavvik, Daniel" <DQavvik@GOV.NU.CA>, "Dyck, Markus" <MDyck1@GOV.NU.CA>, "Pynn, Jonathan" <JPynn@GOV.NU.CA>, Denis Ndeloh <DNdeloh@nwmb.com>

Dear Jasmine,

This is unfortunate! It appears that the GN may be attempting to prevent Sanikiluaq from using the accumulated credits that the community has.

The use of these credits is sustainable according to the principles of conservation, and the polar bear TAH and credit system. The legitimate use of credits is NOT a conservation concern because the TAH legally established the sustainable harvest level for past years and the current year, and the credits were accumulated because the community harvested below the TAH. The unharvested bears were left in the population to reproduce and mature, and therefore the delay in harvesting those bears has been a net benefit to the population. These have been voluntary actions by the hunters of Sanikiluaq. As I understand it, delayed harvesting which benefits bear populations is one reason behind the credit system, which has been approved by both the NWMB and GN.

In November 2019, Drikus Gissing informed me orally that it is the intent of the GN to request that unused credits for Southern Hudson Bay sub-population to be zeroed and for the TAH to be reset, as of July 1, 2020.

Now, the GN informs us that legitimate use of accumulated credits according to the GN- and NWMB-approved procedures is being intentionally denied or stalled, until the GN asks the NWMB to verify, re-approve or change the current legitimate procedures for use of the polar bear credits. Such delays and denials were not mentioned at the NWMB's public hearings on polar bear management. GN's intentional denial to promptly issue tags for existing credits is not legitimate according to existing procedures as the QWB understands them.

Your suggestion, that Sanikiluaq's request could be spread over 2-3 harvest years, is not supported by either Drikus Gissing's statement to me in November or the GN's and other jurisdiction's recent presentations in Sanikiluaq and at the User-to-User meeting in Montreal, where they advocated for a reduced harvest of this sub-population. Is your offer to allow the HTO to use the accumulated credits over the next three years binding on the Minister of the Environment and the NWMB?

I also wish to point out that, normally, if tags are not used in a given year, they are returned to the GN and then added back as credits for future years, except when credits are zeroed if the TAH is reset. If it is truly the intention of the GN and the NWMB not to reset the Southern Hudson Bay TAH for at least 3 years (which would be contrary to all oral statements and formal presentations from the GN since November 2019), then the system could be allowed to function as normal. The 29 credit tags could be issued promptly as Sanikiluaq legitimately requested, and any unused tags could be returned to the

GN and re-credited for future use.

Sanikiluaq's request does follow the current legitimate procedures. Sanikiluaq have only a few months to use any of the credits that it has (on GN's papers), given the apparent likelihood that the GN will propose to rest the TAH and zeros the credit for this sub-population as of July 1, 2020.

Use of polar bear credits that Sanikiluaq has on record should NOT be referred to the NWMB for additional approval because that is not required, to my knowledge. These are bears that could have been harvested in previous years, but the community held back. Instead of the GN fully acknowledging, recognizing and supporting Sanikiluaq's restraint and voluntary harvest reductions for several years, it appears that the GN intends to penalize them for having done so. The QWB wishes to encourage that all parties foster a greater level of trust and cooperation in polar bear management, going forward.

On behalf of the HTO and the QWB, and with all due respect for the GN and DOE's efforts to conserve polar bears and to encourage their traditional use by Inuit, I again request that the GN follow established procedures and promptly issue the 29 credit tags to Sanikiluaq as requested. Based on the trust that that may engender, the QWB and HTO will then cooperate with the GN and the NWMB and begin discussions on how to avoid zeroing unused credits for at least three years, in order to allow Sanikiluaq to use of credit tags over 2-3 years and perhaps longer.

Sanikiluaq's past voluntary harvest reductions should be sufficient to encourage the trust so that the GN will accept this offer. In the opinion of the QWB, this is not a matter of conservation concern because the TAH was approved by the NWMB and the GN and the bears could have been taken legally and sustainably already.

Sincerely,

Mike

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On 2020-04-07 4:04 p.m., PolarBearLab wrote:

Hello James, Mike, and others,  
Please find attached the GN's letter in response to Sanikiluaq's credit use.

Please advise the Polar Bear lab if this request will remain at 29 or it will be changed. The attached letter outlines the available credits and the associated conservation concern with using 29 extra tags in a single season.

Thank you for your patience and we are looking forward to hearing from you.

Best,  
Jasmine