



**SUBMISSION TO THE**

**NUNAVUT WILDLIFE MANAGEMENT BOARD**

**FOR**

**Information:**

**Decision: X**

**Issue:** Polar Bear Harvest Administration and Credit Calculation System (HACCS) and Use of Credits

**Background:**

- The Department of Environment (ENV) has worked closely with co-management partners to develop and implement the Nunavut Polar Bear Co-Management Plan.
- A key component of the Co-Management Plan is a credit system, presently known as the Polar Bear Harvest Administration and Credit Calculation System (HACCS).
- HACCS, in its current form, has been in place since 2022 and there have been multiple requests for using credits made since its inception. Some notable requests include:
  - Arctic Bay requested the use of 5 credits in the 2022/2023 harvest year. This was under 25% of the Total Allowable Harvest (TAH) for Lancaster Sound (85) and was approved.
  - Kinngait requested the use of 12 credits in the 2022/2023 harvest year. This was under 25% of the TAH for Foxe Basin (123) and was approved.
  - Pangnirtung requested the use of 16 credits in the 2022/2023 harvest year. This was over 25% of the TAH for Davis Strait (61).
  - Arctic Bay requested the use of 6 credits in the 2023/2024 harvest year. This was under 25% of the TAH for Lancaster Sound (85) and was approved.
  - Kinngait requested the use of 6 credits in the 2023/2024 harvest year. This was under 25% of the TAH for Foxe Basin (123) and was approved.
  - Pangnirtung requested the use of 36 credits in the 2023/2024 harvest year. This was over 25% of the TAH for Davis Strait (61).
  - Sanikiluaq requested the use of 2 credits in the 2023/2024 harvest year. This was under 25% of the TAH for Southern Hudson Bay (35) and was approved.
- ENV has encountered challenges with the implementation of HACCS particularly surrounding the requirement for review by the Nunavut Wildlife Management Board (NWMB).

- Section 5.7.2.1 of HACCS states that, *Requests for credits that are greater than 25% of the subpopulation TAH in a given harvest year will automatically be sent to the NWMB for review of a potential conservation concern.*
- On January 16, 2024, the NWMB provides notice to its co-management partners that it will be moving to three meetings per year. This change could foreseeably cause delays in reviewing credit requests above the 25% threshold.
- We believe the need for a NWMB decision is unnecessary when the deciding parties (Regional Wildlife Organizations (RWO) and ENV) are in support of releasing the credits requested and agree there is no conservation concern.
- There is an active request by Cambridge Bay for 1 credit to be used for the Viscount Melville polar bear subpopulation. This request is above the 25% threshold for review by the NWMB as the current TAH for that subpopulation is 3 bears. Both the RWO and ENV agree there is not a concern with the release of this one tag, however we are restricted in releasing this by the process outlined in HACCS.
- This standard of review threshold has been noted by Canada during the Non-Detriment Review as a positive step in conservation, however in instances such as the Viscount Melville and Pangnirtung request has proven this process is impracticable and onerous in its implementation and needs to be reviewed to ensure speedy decisions on community credit requests.

#### **Current Status:**

- Through external and internal feedback, it is apparent there remains confusion around the exchange and request process for credits.
- In response to general feedback, ENV is proposing to remove HACCS Section 5.7.2.1, the 25% threshold for NWMB review. As part of this removal, ENV also recognizes that some requests for credit use may present a real or perceived conservation concern. In these instances of real or perceived conservation concerns, it is proposed that any affected party could bring this to NWMB for decision on the use of credits. This will also be more consistent with NWMB's role to consider harvest limitations when there is a potential conservation concern.

#### **Consultations:**

- There have been many informal discussions with the Regional Wildlife Boards since HACCS' inception. Based on our understanding, there remains a general lack of understanding about the system by harvesters who are most impacted by the system.
- ENV provided written notice to staff at the three Regional Wildlife Boards and Environment and Climate Change Canada on December 17, 2024, that it intends to bring the 25% threshold for NWMB review to the February 2025 meeting.

#### **Recommendations:**

1. ENV recommends that the NWMB approve the removal of the 25% threshold for NWMB review.
2. ENV further recommends that NWMB direct ENV to refine HACCS such that use of credits will only be brought to the Board where an affected party believes there to be a legitimate concern to polar bear conservation.