



January 31, 2025

**Written comments from ECCC - Canadian Wildlife Service Wildlife Management and Regulatory Affairs Division to the Nunavut Wildlife Management Board concerning: “TAB 2 - Polar Bear Harvest Administration and Credit Calculation System (HACCS) and Use of Credits”**

**General comments**

- Environment and Climate Change Canada (ECCC) acknowledges the two recommendations submitted by the Government of Nunavut (ENV) to the Nunavut Wildlife Management Board (NWMB) of:
  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.
- ECCC acknowledges that ENV is recommending the removal of HACCS Section 5.7.2.1: *“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.”*
- ECCC acknowledges that ENV has come to this recommendation based on “many information discussions with the Regional Wildlife Boards since HACCS inception” and provided notice to ECCC on December 17, 2024 that they would be bringing these recommendations to the NWMB’s February 2025 meeting.
- ECCC acknowledges the concern raised by ENV regarding the potential delays in reviewing credit requests above the 25% threshold based on the NWMB moving to three meetings per year.

ECCC believes the outcome of the TAB2 submission could affect matters of federal jurisdiction. Accordingly, ECCC would like to submit the following clarifying questions for consideration by the NWMB:

1. With regards to the implications for polar bear subpopulations subject to multiple authorities
  - The HACCS applies to all polar bear subpopulations in Nunavut. Therefore, recommended changes to the HACCS may have management implications for polar bear subpopulations with shared jurisdiction that are subject to multiple authorities. ECCC supports the sustainable harvest of polar bears and equitable sharing of harvest among shared jurisdictions. What mechanisms are currently in place to ensure communication on decisions regarding the use of harvest credits between jurisdictions? Would the proposed changes to the HACCS result in any changes to these processes?

- It was noted that the recommended changes to the HACCS may affect the evaluation of the release of credits by Regional Wildlife Organizations and the Government of Nunavut. Are the criteria of evaluating conservation concern (including real and perceived conservation concern) and the outcomes of evaluations published (publicly accessible) and/or shared with neighboring jurisdictions that may have shared management authority?
2. With regards to Polar Bear Trade under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)
- While the submission does not reference CITES, ECCC would like to offer the observation that Canada is a Party to CITES. Currently, the polar bear is listed on Appendix II of CITES, requiring a CITES export permit (as per requirements under Article IV of the Convention) to enter international trade. CITES export permits can be issued only upon advice from the country's CITES Scientific Authority that the trade will not be detrimental to the survival of the species (known as a non-detriment finding or NDF). Canada updated and published an NDF document in March 2024 ([available here](#)). The NDF document provides background and considerations of the Scientific Authority when making the NDF for export permit applications. While this NDF Report provides an overall assessment of non-detriment, each permit is evaluated on a case-by-case basis. Have there been any considerations regarding how the proposed changes to the HACCS may impact (whether real or perceived) on the sustainability of polar bear harvest? While ECCC is currently unaware of any uplisting petitions for polar bear, it is important to recognize the potential international implications of changes within polar bear harvest systems in Canada.

We appreciate the opportunity to submit these clarifying questions in advance of the NWMB meeting and are looking forward to the discussion on February 26<sup>th</sup>, 2025.