

MAY - 9 2011

Mikidjuk Akavak  
Chairperson of the  
Nunavut Wildlife Management Board  
Box 1379  
Iqaluit, NU X0A 0H0

Dear Mikidjuk Akavak :

Re: Nunavut Wildlife Management Board (NWMB) Public Hearing on the Davis Strait Polar Bear Subpopulation

This letter is in response to the recently proposed modifications to the current Total Allowable Harvest (TAH) for the Davis Strait polar bear subpopulation in both the Nunavut Settlement Area (NSA) and in Labrador. We appreciate the opportunity to comment.

With respect to the establishment of a TAH for polar bears in Newfoundland and Labrador, the provincial *Wildlife Act* and regulations and the Labrador Inuit Land Claims Agreement provide the legislative framework for polar bear management. Within this framework, the Government of Newfoundland and Labrador is responsible for the management of polar bears within the province. Within the Labrador Inuit Settlement Area (LISA) the Torngat Wildlife and Plants Co-management Board (TWPCB), in consultation with the Nunatsiavut Government, establishes, modifies and eliminates the TAH for polar bears. This decision of the TWPCB is subject to disallowance or variance by the Provincial Minister.

As you may be aware, the Province has concerns with respect to the current distribution of the TAH among existing users of the Davis Strait subpopulation and, therefore, has an interest in the distribution of any future increases of the TAH. The Davis Strait subpopulation straddles Quebec, Nunavut, and Newfoundland and Labrador and, together, the three governments share responsibility for the management of this subpopulation. In our view, the current annual harvest of 67 is disproportionately allocated among these jurisdictions. The Government of Newfoundland and Labrador will continue to support and work toward a more equitable quota distribution among all users of the Davis Strait polar bear subpopulation.

An increase in the TAH as currently proposed will act to exacerbate the current inequity, raising concern for the management of this shared resource. Specifically, results from the recent mark-recapture study of the Davis Strait polar bear subpopulation support the need to manage this subpopulation as a whole, rather than through discrete jurisdictional boundaries. Mark-recapture results also indicate that demographic parameters vary among sub-regions (E. Peacock, pers. com.). Continued bias in harvest allocation for the northern regions of the Davis Strait runs contrary to the precautionary principle. Furthermore, in a recent publication in Canadian Journal of Zoology (*Conservation and management of Canada's polar bears [Ursus maritimus] in a changing Arctic*, E. Peacock, A.E. Derocher, G.W. Thiemann, and I. Stirling) researchers suggested that harvest management consider future loss of habitat due to climate change and thus, in the face of uncertainty, maintain harvest at levels lower than maximum sustained yield.

In accordance with The Agreement on the Conservation of Polar Bears (1973), we urge that TAH for the entire Davis Strait subpopulation be established cooperatively using an inter-jurisdictional approach. We suggest that a total Davis Strait polar bear TAH be allocated among jurisdictions according to criteria established *a priori* and based on the best available science. These criteria should consider recent demographic information for each of the sub-regions (Northern, Central, and Southern Davis Strait) to include survival, population trends, recruitment, age structure, and estimates of polar bear abundance, whereby harvest allocation within each of the jurisdictional boundaries reflect sub-regional variation in population demography.

Given population growth rates that extend beyond harvest and the higher survival for the southern Davis Strait, the Province considers that there may be support for a slight increase in TAH, particularly in the Labrador portion of the Davis Strait. Although current population trends may support an increase in TAH, evidence of a future declining population, likely due to habitat loss resulting from climate change, creates uncertainty in population projections associated with harvest reporting. Moreover, current and forecast rates of survival and reproduction supports only a slight increase in TAH.

In addition, biological indicators of population health and trends provide support that we may be under-harvesting from the Labrador portion of the population and over-harvesting in portions of this sub-population. For example, in a recent publication in the Canadian Journal of Zoology (*Conservation and management of Canada's polar bears [Ursus maritimus] in a changing Arctic*, E. Peacock, A.E. Derocher, G.W. Thiemann, and I. Stirling), survival and reproduction of bears in southern Davis Strait was higher than in the north and in combination with genetic studies provides evidence of geographic fidelity. Therefore, the biological evidence in combination with the existing inequity in allocation among jurisdictions provides support that any increase in TAH should come from the Labrador portion of the DS subpopulation and be allocated to Labrador Inuit.

In respect to the process for establishing a TAH for the LISA, the Province will consider a decision from the TWPCB respecting the TAH prior to the polar bear season.

Sincerely,



**ROSS WISEMAN, MHA**  
**Trinity North District**  
**Minister of Environment & Conservation**

- cc. Hon Patty Pottle, Minister of Aboriginal Affairs, Government of Newfoundland and Labrador**
- Hon. John Hickey, Minister of Labrador Affairs, Government of Newfoundland and Labrador**
- Hon. Dave Denine, Minister for Intergovernmental Affairs, Government of Newfoundland and Labrador**
- Hon. Glen Sheppard, Minister of Lands and Natural Resources, Nunatsiavut Government**
- Mr. Bruce Roberts, Chairperson – Torngat Wildlife and Plants Co-Management Board**