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Building *Nunavut* Together
Nunavut liuqatigiingniq
Bâtir le *Nunavut* ensemble

September 22, 2015

Josepi Padlayat
Chairperson,
Nunavik Marine Region Wildlife Board

Roderick Pachano
Chairperson,
Eeyou Marine Region Wildlife Board

RE: Nunavik Marine Region Wildlife Board (NMRWB) decision on Total Allowable Take for the Southern Hudson Bay polar bear subpopulation

I am writing to you in response to your letter dated July 23, 2015, in which you note that the Nunavik Marine Region Wildlife Board (NMRWB) and Eeyou Marine Region Wildlife Board (EMRWB) have made a decision concerning the establishment of a formal Total Allowable Take (TAT) of polar bears within the Nunavik Marine Region (NMR). I applaud the considerable effort and time invested by all parties in reaching this decision.

To reiterate, your decision is to establish an annual TAT of twenty-eight (28) polar bears in the NMR for the Southern Hudson Bay (SH) management unit, resulting in an overall proposed regional harvest of sixty-two (62) bears (25 bears for Nunavut, 9 for Ontario and Quebec, and 28 bears for Nunavik). Further, you have indicated that the implementation of a sex-selective harvest is not warranted at this time due to historical harvest records, which indicate that Nunavik Inuit have routinely harvested polar bears at a *de facto* 2:1 (male:female) sex ratio.

Despite the careful consideration that went into making this decision, I believe that the proposed TAT requires revision. Accordingly, I hereby advise that pursuant to Nunavik Inuit Land Claims Agreement section 5.5.16 and section 15.4.3 of the Eeyou Marine Region Land Claims Agreement I am rejecting the NMRWB's decision.

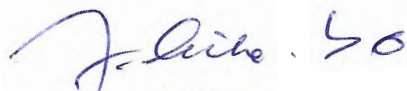
The reasons for the rejection are as follows:

1. The most recent abundance estimate for the SH management unit is 951 (95% CI = 662-1366). A total removal of 62 bears per year, which is above the current voluntary harvest, jeopardizes the sustainability of this subpopulation. This is particularly true if there is no male-bias incorporated into the harvest;
2. Adopting a TAT that is higher than the agreed upon voluntary harvest rate of 22 bears will undermine the cooperative spirit of the current agreement, likely resulting in the reestablishment of pre-agreement harvest levels in Nunavut (25), Ontario and Quebec (9). Again, this would result in a cumulative annual harvest of 62 bears, which is well above an acceptable maximum harvest rate;
3. The SH subpopulation may be subject to a range of pressures that could negatively affect population productivity, and ultimately population size, rendering it particularly vulnerable to overharvest. Documented declines in mean body condition and survival rates, along with reductions in regional sea-ice cover, pose serious concerns and necessitate the adoption of conservative harvest levels.

Although I am rejecting the decision to establish a TAT of twenty-eight bears (28), I encourage the Board to reconsider its decision such that the cumulative TAT for the SH subpopulation does not exceed the maximum sustainable harvest of 4.5 percent. Further, the Board should implement a formal male-biased harvest, whereby two male bears can be harvested for every one female.

I look forward to your response and reconsideration of your initial decision. In the meantime, please contact me if you have questions or concerns.

Sincerely,



Hon. Johnny Mike
Minister of Environment

Cc: Honourable Leona Aglukkaq, Minister of Environment, Government of Canada
Basile van Havre, Director Population Conservation and Management, Environment
Canada
Gabriel Nirlungayuk, Deputy Minister, Nunavut Department of Environment
