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

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Minister of Environment
Ministat Avatiliqiyitkut
Ministre de l'Environnement

October 6, 2016

Josepi Padlayat
Chairperson,
Nunavik Marine Region Wildlife Board

Roderick Pachano
Chairperson,
Eeyou Marine Region Wildlife Board

RE: Final Decision – Establishing a Total Allowable Take and Non-Quota Limitations for the Southern Hudson Bay Polar Bears within the Nunavik Marine Region

This letter is in response to your Boards' final decision about the establishment of a Total Allowable Take (TAT) and Non-Quota Limitations (NQLs) for the Southern Hudson Bay (SH) polar bear subpopulation within the Nunavik Marine Region, dated December 21, 2015. I commend you for your efforts that led to this decision.

To confirm, your final decision is to establish an annual TAT of twenty-eight (28) polar bears in the Nunavik Marine Region (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, as one of the NQLs listed in your letter you indicated that cubs, females with cubs, or bears that are less than two (2) years old shall not be killed, except in defense of life and property circumstances.

After careful consideration of the presented information and pursuant to the Nunavik Inuit Land Claims Agreement section 5.5.20 c) and section 15.4.8 c) of the Eeyou Marine Region Land Claims Agreement I am varying the Nunavik Marine Regional Wildlife Board's final decision as follows:

- a) The annual TAT in the Nunavik Marine Region for the SH management unit will be twenty-three (23) where at least one (1) polar bear from this TAT will be allocated to the Cree of Eeyou Istchee for harvest within the Cree-Inuit overlap area. The allocations of the TAT is to be determined jointly by Regional



Nunavimmi Umajulirijiit Katujiqatigininga (RNUK) and the Cree Trappers' Association according to the provisions in the NILCA and EMRLCA;

- b) All human-caused mortalities will be deducted from the TAT, including all bears killed in defense of life and property (DLP) circumstances;
- c) If the sum of all human-caused polar bear mortalities exceeds the TAT in a given year, the following year's TAT will be reduced correspondingly;
- d) If the harvest in a given year is below the TAT an increase may be permitted the following harvest year. The RNUK will provide a written request to the NMRWB outlining the increase in TAT. Upon review, the NMRWB and/or another relevant authority, as agreed upon by the responsible Ministers, then may approve this request in writing to ensure the request does not represent a conservation concern. A maximum of five (5) tags may be transferred to subsequent years even if the harvest is lower than the TAT by more than 5 bears;
- e) When the transfer has been granted, the credits will expire at the end of the next harvest season. Credits cannot be accumulated over multiple harvest years.

The following non-quota limitations will be established:

- a) The TAT will be based on an annual harvest, with a sex ratio of 1 female per 2 males.
- b) All human-caused bear mortalities (subsistence harvest and DLP kills) will be reported to the appropriate authorities as soon as possible (e.g., within 24 – 48 hours of the kill), regardless of whether or not the kills are intended for sale;
- c) The hunting of polar bears shall be permitted throughout the year, however, for administrative purposes the harvest year shall begin 1 July and end 30 June the following year;
- d) Cubs, females with cubs, or bears that are **less than three (3) years old** shall not be killed, except in DLP circumstances.



- e) Polar bears may not be killed while in their dens. Furthermore, no one may disturb a denning polar bear, unless authorized to do so after consultation with the RNUK and approval by the NMRWB;
- f) Pursuant to NILCA s.5.7.4(d), the RNUK will allocate the TAT among the LNUKs;
- g) Pursuant to NILCA s. 5.7.2 (d), each LNUK will allocate the TAT among its members (by any means it deems appropriate) and will ensure and enforce these allocations as they see fit;
- h) Pursuant to NILCA s.5.7.2(c) and 5.7.4(c), the LNUKs and RNUK may, respectively, impose additional non-quota limitations to their members (e.g. hunting seasons); such measures shall not conflict with those established by the NMRWB or the Minister of Environment.

Reasons for a rejection of the proposed TAT of 28 to you from Minister Mike letter dated 22 September 2015, which for clarification 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.

