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Deputy Minister

Sous-ministre

SEP 23 2015

Mr. Josepi Padlayat
Chairperson
Nunavik Marine Region Wildlife Board
P.O. Box 433
Inukjuak QC J0M 1M0

Mr. Roderick Pachano
Chairperson
Eeyou Marine Region Wildlife Board
81 Metcalfe Street, Suite 900
Ottawa ON K1P 6K7

Dear Messrs. Padlayat and Pachano:

On behalf of Environment Canada, I thank you for your correspondence of July 29, 2015, outlining the decision of the Nunavik Marine Region Wildlife Board and the Eeyou Marine Region Wildlife Board with regard to the total allowable take level for the Southern Hudson Bay management unit of polar bears.

Your decision is to: a) establish an annual total allowable take of 28 polar bears from the Southern Hudson Bay management unit within the Nunavik Marine Region, b) allocate at least one bear to the Cree of Eeyou Istchee within the Cree-Inuit Overlap Area, and c) have the decision in effect until new information is presented that would require it to be revised.

Environment Canada recognizes and appreciates the significant co-operation and co-ordination that your boards have demonstrated in reaching the first ever agreement on the harvest levels for this management unit under the respective land claims agreements. However, I hereby advise that, on behalf of the Minister of the Environment, I am rejecting this decision pursuant to paragraph 5.5.3(a) of the Nunavik Inuit Land Claims Agreement and paragraph 15.2.1(a) of the Eeyou Marine Region land claims agreement. Specifically, I am rejecting the first element of your decision, which is the annual total allowable take of 28 polar bears. This makes the other two points of the decision debatable, though it should be noted that there is no conservation concern respecting the allocation of one bear to the Cree of Eeyou Istchee.

A regional total allowable take of 28 polar bears for Nunavik Inuit and the Cree of Eeyou Istchee, combined with removals by Nunavut Inuit and Ontario Cree, is likely not sustainable and creates conservation concerns for this management unit. As stated previously in the Environment Canada submission to the public hearing held in Inukjuak in February 2014, a maximum sustainable harvest of 4.5 percent should not be exceeded as it could cause the population to decline. It should also include a sex-selective harvest of 2 males to 1 female.

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Furthermore, paragraph 5.5.4.1 of the Nunavik Inuit Land Claims Agreement and paragraph 15.2.2. of the Eeyou Marine Region land claims agreement refer to the need for the respective boards to, in making harvest decisions, take into account the terms of domestic interjurisdictional agreements pertaining to wildlife. The document entitled *Consensus from the Southern Hudson Bay Polar Bear Management Meeting, Ottawa, 27 September 2014* (also known as the 2014–2016 voluntary agreement) is a domestic interjurisdictional agreement. I hereby request that it be considered when you develop your final total allowable take decision.

We are confident that the Nunavik Marine Region Wildlife Board and the Eeyou Marine Region Wildlife Board will consider all of the available information and adhere to sound management practices and principles of conservation. I look forward to your final decision.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Martin', with a stylized flourish at the end.

Michael Martin