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April 10<sup>th</sup> 2008

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Re: WWF-Canada SUBMISSION TO NWMB PUBLIC HEARING ON PROPOSED POLAR BEAR T.A.H. REDUCTIONS FOR BAFFIN BAY POPULATION

Dear Mr. Tigullaraq:

Thank you for the opportunity to provide a written submission for this important hearing to be held by NWMB later this month in Mittimatalik (Pond Inlet).

For over 30 years WWF has supported a large number of conservation projects across northern Canada that focus on the gathering of information – both traditional and local ecological knowledge, and scientific research – that will assist with effective planning and decision-making on the use of natural resources. WWF is proud to have been able to support a series of Inuit community-based projects compiling IQ/TEK on Polar Bears and other ice-dependent species, as well as world-class scientific research on various Polar Bear populations in Canada and other Arctic nations.

As you will know well from past issues and projects in Nunavut, WWF is not opposed to the sustainable harvesting of wildlife species, and we fully recognise the provisions of the NLCA and the traditions of Inuit. However, as a leading worldwide conservation organisation we also know from numerous case studies that adequate research, monitoring and cautious management approaches must be sustained if healthy wildlife populations are to be utilised, managed and sustained in the long term.

There is much concern now at all scales about the rapid rates of change to Arctic ecosystems, driven primarily by accelerating climate change, but also by long-range transportation of anthropogenic toxins. In addition, wildlife species like Polar Bears will continue to be increasingly challenged by escalating industrial pressures within their natural habitats. Polar Bears are at the top of Arctic foodwebs, and acknowledged to be very sensitive to a range of human-induced pressures. In that sense, they are widely regarded as an important indicator of planetary health. But it is the projected swift reduction and eventual loss of sea-ice habitat that is of greatest significance for the long-term survival prospects of Polar Bears. Few credible people would imagine that Polar Bears could adapt and survive in healthy wild populations without sufficient sea-ice habitat. The outstanding and highly collaborative compilations, analyses and projections of IPCC and ACIA and IUCN must clearly all be



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taken very seriously and in full as decisions are made about managing human pressures on wild Polar Bear populations for the rest of this Century.

In this context, and recognising similar situations elsewhere in the world with other wildlife populations that have mistakenly or consciously been over-harvested in the past, WWF strongly recommends that a highly precautionary approach be taken at this point with future management of the highly significant Baffin Bay Polar Bear population (among the largest of the world's 19 Polar Bear 'populations/management units'). It is very clear that a 30% population decline in less than a decade, from 2100 in 1997 to about 1500 presently, is a massive problem for such a species. In this situation, WWF would strongly support the Govt. of Nunavut's DOE Option 4 ("harvest moratorium until the population has increased to the target number of 2074"). This management response option will have the highest prospects of succeeding quickly, and will allow the Baffin Bay Polar Bear population to recover to a healthy level sufficient to: best adapt to climatic changes, permit any resumption of well-managed and well-monitored sustainable harvesting, and allow effective management of other human pressures.

WWF notes that the previously un- or under-reported harvesting of Baffin Bay Polar Bears by Greenland Inuit is a significant part of the current problem, and that some measures to address this are now being put in place. We also note that in the NWT, similar steep declines in barren-ground caribou herd populations (based on local observations and science-based surveys) have caused great concern among communities and Aboriginal groups, which have led to a range of very substantial voluntary reductions in harvest levels by First Nations harvesters. This is very good - precautionary conservation planning and management adjustments in the interests of the wildlife species resource and future generations of humans.

It is also very important to note that the management and stewardship of Canada's wild Polar Bears is not only the responsibility and concern of Nunavut and Inuit, but also of the Government of Canada and the broader Canadian public. Many millions of world citizens too are extremely concerned for the future well-being of Polar Bears and Arctic ecosystems. WWF recognises that a number of binding commitments have been made by the Govt. of Canada regarding the conservation of biological diversity, and that these require our nation to adhere to these in decision-making within its borders. Of special relevance here in the Baffin Bay and Nunavut Polar Bear context is the 1973 International Agreement on the Conservation of Polar Bears and their Habitats. We urge the NWMB and all key parties involved to ensure that all the Articles in this Agreement are fully respected in the interests, ultimately, of successful conservation of Polar Bears and their habitats, for future generations.

In particular, WWF underscores the need for sufficient credible information and rigorous analyses of the facts – both scientific and observations of local people. Without this, further critical mistakes will be inevitable, leading to more situations such as that confronting NWMB just now for the Baffin Bay population of Polar Bears. Of course, numerous laws and policies of governments across Canada have rightly recognised that the precautionary principle must apply to effective decision-making – such that in the absence of scientific certainty, decisions taken must be based on a highly precautionary



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approach. Further, Article VII of the 1973 Polar Bear Agreement emphasises the need for high quality "research relating to the conservation and management of the species". This is so fundamental to the management of Polar Bears and their habitats, yet it is very apparent that adequate information is NOT available for most Canadian Polar Bear populations. This situation must clearly be rectified if continued human activities such as industrial developments and harvesting are to be permitted and sustained in Nunavut, without compounding further the problems for wild Polar Bears.

And finally, to avoid future problems such as that created by over-harvesting of the Baffin Bay Polar Bear population at a time of rapid climatic and environmental and social change, WWF believes that a long-term, rangewide conservation action plan for the world's Polar Bears is urgently needed, satisfactorily addressing all current threats to Polar Bears and their habitats, and that this should be developed, adopted and implemented swiftly by all range jurisdictions.

Thank you again for this opportunity to provide WWF's views, and I do hope that you will contact me if you would like further details or discussion of these points.

Yours sincerely

Peter J. Ewins, D.Phil. Species Conservation Director WWF-Canada

cc. Sue Lieberman, Director, Species Programme, WWF-International, Gland, Switzerland.