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## Introduction

Makivik Corporation (hereafter referred to as Makivvik) and the Anguvigaq wish to provide comments to the Nunavik Marine Region Wildlife Board (NMRWB) and the Eeyou Marine Wildlife Board (EMRWB) on the issue of the need for the establishment of Non-Quota Limitations (NQL) for polar bears in the Nunavik Marine Region (NMR) and the Eeyou Marine Region (EMR) including the Cree / Inuit Offshore Overlapping Interests Area. We hope that this final written submission will be helpful in supporting the NMRWB and the EMRWB decision-making process. Please note that this submission is not replacing but supporting the verbal and written statements provided by Makivvik and the Anguvigaq during the public hearing process.

## Considerations

Throughout this hearing process, Inuit have shown the depth of their knowledge on polar bear and how they have been successfully cohabiting in Nunavik for as far as Inuit collective memory goes. The knowledge on polar bear behavior, biology and habitat along with harvesting and cultural practices have been passed down from one generation to the next ensuring, up to this day, the safety of communities and the maintenance of a healthy polar bear population.

Inuit are stewards of their lands and an integral part of Nunavik ecosystem. The careful observation of their land and wildlife is what allowed Inuit to adjust their practices and adapt to changes for millennia. While the observation methods are changing and their role as wildlife managers is evolving and formalizing, their practices are still rooted in traditions and a profound respect for their homeland. Inuit values stood out during the hearing and guided our reflection on this important subject.

First, Makivvik and the Anguvigaq would like to remind the Boards that the foundation of this hearing lies in a clear and essential question: **Is there currently a conservation concern for polar bears?**

Throughout this process, evidence from Inuit knowledge, scientific research, and hearing submissions consistently indicates that polar bear subpopulations in Nunavik are either stable or increasing. For example, the Foxe Basin subpopulation has remained stable since the 1990s, despite sea ice loss. Governments and scientists further report an increase in bear numbers, improved body condition, and a higher number of cubs-of-the-year per female. While the Davis Strait subpopulation has recently shown a declining trend, both scientific surveys and Inuit knowledge highlight a longer-term pattern of population growth.

Similarly, in Southern Hudson Bay, scientific studies have identified a stable population, a conclusion reinforced by the Polar Bear Technical Committee's status table. Inuit knowledge shared during the hearing reinforces this assessment, with thoughtful observations noting that polar bears in the region remain in healthy body condition and are well-adapted to changing environmental conditions.

We recognize that climate change is driving shifts in sea ice patterns and ecosystems across the North. However, the appropriate response to these changes is not to limit Inuit harvesting rights, especially in the absence of a clear and demonstrated conservation concern. Instead, efforts should focus on improved, ongoing monitoring that integrates both scientific data and Inuit Knowledge, providing a more complete and nuanced understanding of polar bear populations, habitat changes, and ecosystem dynamics in the future.

Overall, all lines of evidence—scientific research, Inuit knowledge, and hearing submissions, support the same conclusion: there is no current conservation concern for polar bears in the NMR. This assessment is fully consistent with the definition of **conservation** under the Nunavik Inuit Land Claims Agreement (NILCA, 5.1.5(b)) which is defined as “the maintenance of vital, healthy wildlife populations capable of sustaining harvesting needs as defined in this Article.”

Additionally, we want to highlight the fact that the Southern Hudson Bay Harvest Risk Assessment, which includes three different scenarios provided by Eric Regehr, should not be viewed as prescriptive guidelines, but rather as an additional tool to inform decision-making on possible management measures. We must emphasize that these scenarios are grounded exclusively in western scientific approaches, without the inclusion of Inuit Knowledge in the modelling process.

It is important to note that effective wildlife management does not require a fixed population target to be biologically sound. Inuit have never required a specific number to care for and sustain animal populations; their stewardship is guided by close observation, experience, and respect for natural balance. Furthermore, managing a population based on observed trends—such as stable abundance and healthy body conditions—is a widely accepted conservation approach, especially for long-lived, wide-ranging species like polar bears.

The focus should be on maintaining population resilience and sustainability through ongoing, adaptive monitoring—not on achieving or maintaining a static numerical goal. This is particularly relevant in regions like Southern Hudson Bay, where available evidence indicates a stable subpopulation, while also acknowledging the possibility of some polar bear movement between the Southern and Western Hudson Bay subpopulations. Relying on multiple forms of knowledge, including long-term local observations, supports more effective and culturally appropriate management strategies that respects both sustainability outcomes and Inuit harvesting rights.

The above observation regarding the health status of the polar bear population of Nunavik, along with statements made by participants at both phases of the hearing regarding human-bear encounters, are key in shaping the Boards’ decision regarding TAT and NQLs. Additionally, said decision should align with and support the continued implementation of the 2023-2033 Qc-EMR-NMR polar bear management plan, which the NMRWB and EMRWB approved in 2022. As such, and as stated in our Phase 2 submission, we suggest that the objective guiding the Boards’ decision be:

- *to maintain a balance between sustaining the population to a level that supports Inuit harvesting and cultural practices, short to long term, while ensuring security of people and their properties.*

In the absence of a conservation concern, there are no grounds for limiting Nunavik Inuit harvesting rights to effect a conservation purpose or, consequently, for giving effect to the allocation system and reciprocal arrangements with other Cree and Inuit groups (NILCA 5.5.3 a, b). As for the public health and safety criteria that could allow the Boards to limit such harvesting rights (NILCA 5.5.3 c), no mention was made at the hearing of any such concerns that would support limits on harvesting. In fact, safety concerns that were raised rather called for the ability of Nunavimmiut to protect their communities from threats posed by polar bear to humans and property.

In this context, the Boards must refrain from imposing a TAT as part of their decision, such management tool being a last resort when needing to address a conservation concern through harvest limitations. This is also in line with the 2023-2033 Qc-EMR-NMR polar bear management plan's guidance on whether or how to use harvest restrictions depending on circumstances observed. As for NQLs, we believe that the measures already in place, or in the process of being put in place, must first be analyzed in order to determine whether there is a need for the Boards to establish management measures that are meant to be enforced by the responsible ministers.

- Cultural best practices and Inuit-led management, including:
  - Full polar bear harvest reporting to the Canadian Wildlife Service and the Government of Nunavut Department of Environment, using the Nunavik wildlife harvest monitoring mobile app. The mobile app implementation is led in partnership between the Anguvigaq and Makivvik. At the time of this submission, the app is being used as part of a pilot phase by employees of the Anguvigaq, the Anguvigait managers, and Makivvik's Department of Environment, Wildlife and Research. A full deployment of the app is planned on October 21, 2025;
  - The transfer of the management of the tagging system to the Anguvigaq, in collaboration with the MELCCFP;
  - Anguvigaq's continued implementation and updating, where needed, of the 1984 polar bear regulations; and
  - Polar bear safety trainings provided to Nunavik communities and supported by Makivvik. The program has been highly successful so far with close to 70 new certified bear guards in Nunavik. This training program will continue in 2026 with the five remaining communities with the objective to complete all 14 Nunavik communities and Chisasibi.
- 2023-2033 Qc-EMR-NMR polar bear management plan which, amongst various objectives and approaches, calls for:
  - Documenting the knowledge of Nunavik Inuit and the Crees of Eeyou Istchee; integrating such knowledge with scientific research; strengthening information exchange between community members, researchers, management authorities and other relevant stakeholders; all of which for better management decisions and implementation
  - Improving co-management partners' understanding of the shift in ecosystemic variables and their impacts on polar bear (climate change, prey abundance, development activities, etc.)

- Monitoring the health and abundance of polar bears in a collaborative and coordinated manner, at a frequency that allows robust decision-making
  - Convening regularly amongst co-management to partners for information sharing and review, best practices sharing, and adaptive management
- Populations surveys and habitat monitoring: In addition to the above, we believe that a specific requirement for regular surveying of the polar bear population and monitoring of habitat changes should be identified by the Boards in order to address questions raised at the hearing about potential threats caused by climate change and development activities in the NMR. This is essential in order to shift the burden of precaution efforts from Inuit bearing harvest limitations, to governments fulfilling their wildlife monitoring responsibilities. In line with the objectives and approaches put forward by the 2023-2033 management plan, and although such survey and monitoring program(s) are the ultimate responsibility of governments, we expect that they be developed and implemented in partnership with Inuit co-management partners.

Considering the NILCA's objective to recognize Nunavimmiut's central role in wildlife management, and in light of the right of self-determination and the importance of supporting reconciliation, we ask the Boards to refrain from turning Inuit-led management measures into enforceable NQLs. We rather emphasize government's ultimate responsibility for wildlife management to ensure that appropriate support, both financial and technical, be provided to Inuit co-management partners when and as needed, to help ensure the success of resource-intensive yet essential endeavors such as the harvest monitoring mobile app.

Lastly, we must address the couple interventions that were made by some of the hearing parties throughout Phases 1 and 2 regarding the potential impacts of a shift of management measures on the international trade framework and associated commercial possibilities. More specifically, we stress the need for external pressures not to interfere with NILCA-based management and rights.

To this effect, the Boards must consider how NILCA 5.5.3 and 5.5.4.1 interact with each other. In the absence of a conservation concern, harvest limitations are not warranted. However, this does not take away the need for sustained monitoring efforts, which in turn must influence the negotiation and implementation of agreements foreseen under 5.5.4.1 – not the other way around (i.e., international agreements influencing domestic decisions on whether or not to implement harvest limitations). Although the trade market was not raised as a primary concern by Nunavimmiut who took part in the hearing, and without taking position here as to whether the Convention on International Trade of Endangered Species (CITES) stands as an international wildlife agreement in the sense of 5.5.4.1, if the Boards decide to look into trade considerations as part of their decision making, we argue that the above rationale of a hierarchy between 5.5.3 and 5.5.4.1 must prevail. Further, considering that TATs and NQLs have never been made enforceable by Canada nor the Government of Nunavut, those limitations create and maintain a false sense of robust management and risk drawing away attention and resources from systematic monitoring programs and research partnerships that are necessary to fully understand the extent of threats from climate change and habitat shift and their potential linkages with population trends. It is these comprehensive monitoring and research programming and management systems such as the 2023-2033 Qc-EMR-NMR Management plan that must be considered for non-detrimental findings

evaluations by Canada, and that must be supported and showcased on the international scene so as to address any concerns regarding the sustainability of polar bear trade. Of course, this must be done by involving Inuit in the demonstration of the comprehensiveness and efficiency of the co-mgmt. system (NILCA 5.8.2).

Lastly, we wish to point out that our recommendation to refrain from imposing a TAT in an attempt to preserve the polar bear fur trade market does not go against the NILCA principles of a viable and desirable long-term, healthy, renewable resource economy or the need for systems of wildlife management that provide for its optimum protection (5.1.2 e and g). As explained above, in the current context of healthy bear populations, it is through the appropriate education and demonstration efforts on the domestic and international wildlife trade forums that the renewable resource economy must be safeguarded, not through a TAT.

In sum, and unlike what certain parties to the hearing have presented, we believe that maintaining quotas for the purpose of safeguarding the trade market is not an appropriate answer to the rights, interests, needs and issues put forward by Nunavimmiut throughout the hearing.

## **Recommendation**

Given that measures such as TAT and NQLs for polar bear are not only poorly understood, but also not being enforced by responsible governments in Nunavik, they can't be held responsible for the healthy polar bear population in Nunavik. There is no positive coming out of a TAT, but the negative impacts are numerous. First, it creates a mistrust in the management system and creates unnecessary restrictions on Inuit. Second, it shifts the focus away from opportunistic hunting and can increase pressure on the species. For example, if there is no TAT, Inuit will typically hunt polar bears as they come across them. With a TAT and the risk of losing the opportunity, hunters are more likely to seek them out. As expressed in our submission following Phase 2 of the hearing process, we believe that Inuit practices have proven to be the most effective management measures. This is why our focus is the establishment of a culturally appropriate monitoring system and to support the implementation of the Qc-EMR-NMR polar bear management. We hope to receive the support of our co-management in these endeavors.

In 2022, when Makivvik and the Anguvigaq started the work on the harvest monitoring system, it was with the firm belief that we were ready for this next step in our role as wildlife managers and that we are committed to make this project a success. Accordingly, our recommendation to the Boards is quite simple – do not impose management measures that are already in place or in the process of being implemented. Trust that our goals to maintain healthy wildlife populations are aligned and use this decision-making process to uplift our leadership and self-determined actions.

## **Conclusion**

Makivvik and the Anguvigaq would like to thank the NMRWB and the EMRWB for considering our comments regarding the consideration for non-quota limitations for polar bears in the Nunavik Marine Region and Eeyou Marine Region. We hope that this process will serve and support the establishment of a polar bear management system that is rooted in collaboration and guided by

Inuit values and practices. Throughout the hearing, some parties made it clear that 'the world is watching' and that the decision we are making now could have a tripling effect on the national or international spheres. Our response to that is - let them watch. Let's bring Inuit stewardship to the forefront of these national and international platform and break the narrative that without the government-imposed rules, management can't be successful. The knowledge and information shared during this hearing was proof that our Inuit ways have been the basis of an effective management system, and we are enthusiasts to keep working in that direction for the wellbeing of our communities and the health of the Nunavik polar bear population.