IUCN/Species Survival Commission
Polar Bear Specialist Group

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12 December 2023

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Heads of Delegation of the Polar Bear Range States,

We are writing on behalf of the Polar Bear Specialist Group (PBSG) of the International Union for the Conservation of Nature, in the PBSG's capacity as scientific advisor to the Polar Bear Range States (Canada, Greenland, Norway, the Russian Federation, and the United States) under the 1973 *Agreement on the Conservation of Polar Bears* (hereafter "the Agreement").

Beginning with the 2019-2020 harvest season, management authorities in Nunavut, Canada changed its approach to polar bear harvest management by allowing an up to 1:1 male-to-female sex ratio in the harvest for all subpopulations within its jurisdiction. As harvest levels had previously been based on a 2:1 male-to-female sex ratio, and because Total Allowable Harvest (TAH) levels were not revised, this management change increased the allowable take of female polar bears by up to 50%.

A higher female harvest increases the risk that harvest will cease to be biologically sustainable and cause population declines and loss of future harvest opportunities. Female polar bears are critically important to

population growth. Like many other wildlife species, harvest management systems for polar bears have generally allowed more males than females to be taken as a conservation strategy to maintain healthy numbers of females and to maximize total harvest. Subpopulation-specific assessments of harvest risk that consider indices or estimates of reproduction, survival, and abundance are needed to estimate the sustainable harvest level, which depends primarily on the number of females taken. Without completing harvest risk assessments using recent population and harvest data, it is not possible to estimate the magnitude or severity of increased risk for each subpopulation resulting from the change to an up to 1:1 male-to-female harvest sex ratio without a reduction in the TAH.

The PBSG recognizes the nutritional, cultural, and economic importance of polar bears, as well as the need to prioritize human safety and the prerogative of management authorities to select harvest strategies that meet their specific situation and management objectives. The PBSG also supports the sustainable harvest management framework developed at the request of, and recently approved by, the Range States (Regehr EV, Andersen EM, Galicia MP, Iverson SA, Mangipane LS, Richardson ES, Ugarte F and SP Woodruff. *Polar Bear Harvest Management: Defining Biological Sustainability, the Components of a Quantitative Subpopulation Assessment, and the Components of a Sustainable Harvest Management Regime*. White paper developed at the request of the Polar Bear Ranges States, 20 January 2023).

The PBSG strongly advises that the change to an up to 1:1 harvest sex ratio, without having first evaluated the effects of this change or adjusting TAH, increases the risk that harvest is not biologically sustainable. The PBSG highly recommends that governmental and co-management organizations responsible for harvest management in Nunavut define management objectives for affected subpopulations and undertake quantitative harvest risk assessments, following the framework in the sustainable harvest white paper, to identify harvest strategies capable of meeting these objectives.

More broadly, the PBSG is of the opinion that some recent harvest management practices in Nunavut—including the switch to an up to 1:1 harvest sex ratio without reducing the TAH, carry-over of harvest credits from previous management intervals, and unilateral increases in TAH for subpopulations shared with other jurisdictions—are inconsistent with Article II of the Agreement, which states that the Range States "shall manage polar bear populations in accordance with sound conservation practices". In addition to increasing harvest risk, these practices have the potential to negatively impact hunters and communities that depend on polar bears, for example by reducing the availability of polar bears for future subsistence use or leading to the polar bear being uplisted to Appendix I under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). A CITES uplisting would effectively end international trade in polar bear hides and therefore have a negative economic impact not only on Indigenous communities in Canada but across the Arctic.

Sincerely,

Nick Lunn

Kristin Laidre