

**MARINE MAMMAL COMMISSION**  
4340 EAST-WEST HIGHWAY, ROOM 905  
BETHESDA, MD 20814

4 February 2005

Mr. Stephen A. Williams, Director  
U.S. Fish and Wildlife Service  
1849 C Street, NW, Rm. 3259  
Washington, DC 20240

Dear Mr. Williams:

Amendments enacted to the Marine Mammal Protection Act in 1994 authorize the Fish and Wildlife Service to issue permits allowing the importation of polar bear trophies from Canada under certain circumstances. Among the requisite findings to be made by the Service is that “Canada has a sport hunting program based on scientifically sound quotas ensuring the maintenance of the affected population stock at sustainable levels.” At present, affirmative findings are in place for six of the 14 polar bear management units that occur in Canada.

The Marine Mammal Commission recently was advised that the government of Nunavut, Canada, is considering increasing the allowable harvest of polar bears, based, apparently, on revised abundance estimates for several of the management units that occur in Nunavut. Reportedly, this includes three of the polar bear management units for which the Service has made affirmative findings under section 104(c)(5) of the Marine Mammal Protection Act. In addition, hunting would again be allowed from the M’Clintock Channel management unit, for which the Service revoked its affirmative finding in 2001 after determining that the population had severely declined from previous abundance estimates as a result of overharvesting. The largest quota increases, both in terms of absolute numbers and on a percentage basis, would be for some of the populations for which affirmative findings have not been made.

The proposal to increase harvest limits will be discussed at the Canadian Polar Bear Technical Committee meeting in Edmonton on 7-9 February 2005. Representatives of the Service will be attending the meeting. The Commission encourages the Service to use this opportunity to elicit a thorough review of the scientific basis for the increased harvest limits and to ensure that these harvest levels are sustainable. Although a key concern should be whether any of the proposed increases throw into question the affirmative findings currently in place for the management units from which imports to the United States are allowed, the Service should also look more broadly at whether any of the increases for other populations would be inconsistent with the purposes of the Agreement on the Conservation of Polar Bears.

The Commission understands that recent increases in the population size estimates for some of these populations are based, at least in part, on traditional knowledge. In particular, polar bears have been observed with increasing frequency near Inuit communities and hunting camps. That trend has been interpreted as evidence of an increase in the size of the population of polar bears in the corresponding management unit. Although the Commission respects the usefulness of traditional knowledge for many purposes, we are concerned that several different factors could cause

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changes in the frequency of sightings of polar bears near settlements or hunting camps so that the apparent increase in the number of bears sighted may not reflect actual changes in the size of bear population. Other possible explanations could include changes in the distribution of the polar bear population, attraction to inhabited sites as a source of food, changes in the availability of sea ice as a hunting habitat for polar bears, or decreased availability of prey (primarily ringed seals, which are strongly associated with sea ice). Although the trends detected through traditional knowledge suggest possible increases in polar bear abundance and merit additional investigation, the Commission questions whether hunting quotas should be increased without additional corroborating information.

The Commission is confident that the Service staff that will be attending the meeting have the requisite background and expertise to pursue these issues with their Canadian counterparts and encourage them to explore fully the basis for all of the revised population estimates and corresponding changes in harvest limits. We look forward to hearing about what is learned at the Polar Bear Technical Committee meeting and would welcome the opportunity to work with the Service as it considers possible action in response.

Sincerely,

A handwritten signature in black ink, appearing to read "David Cottingham", with a long horizontal flourish extending to the right.

David Cottingham  
Executive Director