

**Pankratz,Rhiannon (elle, la | she, her) (ECCC)**

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**From:** SAR-NT/ LEP-NT (ECCC)  
**Sent:** Monday, January 22, 2024 3:20 PM  
**Subject:** RE: FOR COMMENT: Proposed SARA amendments Hoary Bat (Due January 15, 2024)

Hello,

This is a follow up to an earlier email requesting comments on the proposed amendments to the Species at Risk Act for the Eastern Red Bat and Hoary Bat, by January 15, 2024 (see below for more information). If you are interested in providing comments but require additional time, please respond by Jan 26 ,2024.

Kind Regards,

Rhiannon Pankratz  
(*She,Her/Elle*)

Northern Liaison Biologist  
Canadian Wildlife Service - Northern Region  
Environment and Climate Change Canada / Government of Canada  
[rhiannon.pankratz@ec.gc.ca](mailto:rhiannon.pankratz@ec.gc.ca) / Tel: 867-445-7927

Biologiste – Liaison Régionale  
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[rhiannon.pankratz@ec.gc.ca](mailto:rhiannon.pankratz@ec.gc.ca) / Tél.: 867-445-7927



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**From:** SAR-NT/ LEP-NT (ECCC)  
**Sent:** Friday, November 17, 2023 4:02 PM  
**Subject:** FOR COMMENT: Proposed SARA amendments Hoary Bat (Due January 15, 2024)







Species	Status	Reason for listing and Implications	Nunavut Range
<p><b>Hoary Bat</b></p>  <p><a href="#">Species Information (SARA Registry)</a></p>	<p>Under consideration for addition to list.</p> <p>New Proposed (COSEWIC) status – <b>Endangered</b> (2023)</p> <p>Current (Schedule 1) status SARA – Not listed</p>	<p>This species was assessed as endangered due to steep declines, over 50% over three generations. The primary threat to this species is mortality at wind energy facilities. Wind power capacity is expected to increase but this threat can be mitigated.</p> <p>If listed as Endangered, a national Recovery Strategy will be required, including identification of critical habitat.</p>	 <p>It occurs irregularly in Nunavut. It has been reported near Arviat and Coral Harbour (see red circles). The regular breeding range excludes Nunavut.</p>

For more information please refer to the attached “Part 1: Consultation on Amending the List of Species under the Species at Risk Act: Terrestrial Species”, the “Part 2: List of Species Eligible for an Amendment to Schedule 1” and the Part 3: Species Summaries. These documents explain the process and contain more information on the species under consideration. You are invited to submit comments regarding the potential impacts of these proposed amendments to the List of Wildlife Species at Risk. Your comments will be considered and will inform the Minister’s recommendation to Cabinet.

Given the steep decline of these species, we are conducting consultations on the proposed listing of these species quicker than we normally would. We would appreciate if you could provide comments by **January 15<sup>th</sup>, 2024**. If you require additional time, please inform us prior to the requested deadline. Our intent is to present these species at the first meeting of the Nunavut Wildlife Management Board in 2024. Comments can be submitted until we present at that meeting.

Please contact Rhiannon Pankratz, ([SARA.North@ec.gc.ca](mailto:SARA.North@ec.gc.ca), 867-445-7927) directly if you would like to provide comments, if you have questions about the SARA process or the species under review, or if you would like to request an online presentation of this material.

Please indicate your decision on the listing of these species under SARA. We would appreciate your response by **January 15<sup>th</sup>, 2024.**

I welcome your participation in this matter.

Yours sincerely,

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**Pankratz,Rhiannon (elle, la | she, her) (ECCC)**

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**From:** SAR-NT/ LEP-NT (ECCC)  
**Sent:** Monday, January 22, 2024 3:16 PM  
**Subject:** RE: FOR COMMENT: Proposed SARA amendments Eastern Red Bat and Hoary Bat (Due: January 15, 2024)

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**From:** SAR-NT/ LEP-NT (ECCC)  
**Sent:** Friday, November 17, 2023 4:26 PM  
**Subject:** FOR COMMENT: Proposed SARA amendments Eastern Red Bat and Hoary Bat (Due: January 15, 2024)

*English follows*











Every year the Government of Canada considers the scientific assessments of terrestrial species by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) that are eligible either to be added to the List of Wildlife Species (Schedule 1) of the *Species at Risk Act (SARA)* or to have their status changed. This year they are considering two species of bats, the Hoary and the Eastern Red Bat (see table below). These species do not regularly occur in Nunavut. We are interested to know if you have any comments on these species and your position on the proposed addition of these species to Schedule 1 of the SARA.

Briefly, the species found in Nunavut included in the proposed amendments to Schedule 1 are (to see more details see attached species summaries):

Species	Status	Reason for listing and Implications	Nunavut Range
<p><b>Hoary Bat</b></p>  <p><a href="#">Species Information (SARA Registry)</a></p>	<p>Under consideration for addition to list.</p> <p>New Proposed (COSEWIC) status – <b>Endangered</b> (2023)</p> <p>Current (Schedule 1) status SARA – Not listed</p>	<p>This species was assessed as endangered due to steep declines, over 50% over three generations. The primary threat to this species is mortality at wind energy facilities. Wind power capacity is expected to increase but this threat can be mitigated.</p> <p>If listed as Endangered, a national Recovery Strategy will be required, including identification of critical habitat.</p>	 <p>It occurs irregularly in Nunavut. It has been reported near Arviat and Coral Harbour (see red circles). The regular breeding range excludes Nunavut.</p>

Species	Status	Reason for listing and Implications	Nunavut Range
<p><b>Eastern Red Bat</b></p>  <p><a href="#">Species Information (SARA Registry)</a></p>	<p>Under consideration for addition to list.</p> <p>New Proposed (COSEWIC) status – <b>Endangered</b> (2023)</p> <p>Current (Schedule 1) status SARA – Not listed</p>	<p>This species was assessed as endangered due to steep declines, over 50% over three generations. The primary threat to this species is mortality at wind energy facilities. Wind power capacity is expected to increase but this threat can be mitigated.</p> <p>If listed as Endangered, a national Recovery Strategy will be required, including identification of critical habitat.</p>	 <p>It occurs irregularly in Nunavut. It has been recorded in Coral Harbour (see red circle). The regular breeding range excludes Nunavut.</p>

For more information please refer to the attached “Part 1: Consultation on Amending the List of Species under the Species at Risk Act: Terrestrial Species”, the “Part 2: List of Species Eligible for an Amendment to Schedule 1” and the “Part 3: Species Summaries”. These documents explain the process and contain more information on the species under consideration. You are invited to submit comments regarding the potential impacts of these proposed amendments to the List of Wildlife Species at Risk. Your comments will be considered and will inform the Minister’s recommendation to Cabinet.

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Please contact Rhiannon Pankratz, ([SARA.North@ec.gc.ca](mailto:SARA.North@ec.gc.ca), 867-445-7927) directly if you would like to provide comments, if you have questions about the SARA process or the species under review, or if you would like to request an online presentation of this material.

Please indicate your decision on the listing of these species under SARA. We would appreciate your response by **January 15<sup>th</sup>, 2024**.

I welcome your participation in this matter.

Yours sincerely,

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## Eastern Red Bat

Photo: © Sherri Fenton and Brock Feinton



**Scientific Name**  
*Lasiurus borealis*

**Taxon**  
Mammals

**COSEWIC Status**  
Endangered

**Canadian Range**  
British Columbia, Alberta, Saskatchewan, Manitoba, Ontario, Québec, New Brunswick, Nova Scotia, Prince Edward Island, Newfoundland and Labrador, Yukon, Northwest Territories

### Reason for designation

This medium sized reddish-orange bat is found across most of Canada in the summer months and during its fall migration. This bat migrates annually, and this seasonal migration exposes individuals to numerous threats, of which the greatest is from mortality at wind energy facilities. Although there is considerable uncertainty regarding exact rates of decline for these bats across Canada, declines in carcass counts at wind energy facilities suggest declines far in excess of 50% over three generations. The planned increase in wind power capacity will increase this threat but mitigation is possible. Additional threats include habitat loss and degradation, habitat change and pesticide use, and widespread declines in prey insect abundance.

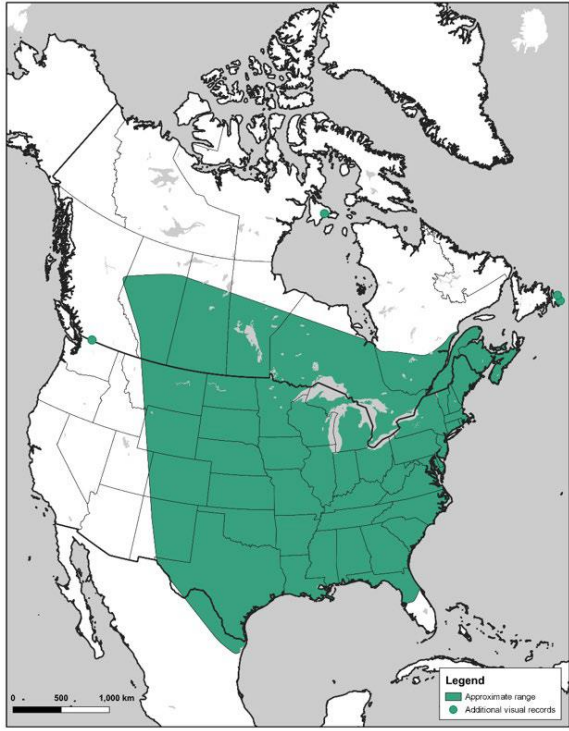
### Wildlife Species Description and Significance

Hoary Bats, Eastern Red Bats, and Silver-haired Bats are medium to large in body size relative to other bats species in Canada, with Hoary Bats being the largest species in Canada. All three species have complex and varied colouration that aids in camouflage while roosting or hibernating. These three bat species are similar in that they mostly roost in trees, migrate long distances between summer breeding grounds and their winter range, are long-lived, give birth to more than one pup per year, and share similar diets and ecomorphology.

There is no evidence of population genetic structure in any of these three species. There is only one designatable unit for each species in Canada.

### Distribution

All three species are widely distributed in North America, found from the northern boreal forest to central Mexico. In Canada, the three species have a range that extends from British Columbia to the Atlantic provinces during the summer, although their extent of occurrence in Prince Edward Island and the territories is uncertain. These species migrate seasonally from their northern summer ranges to their southern wintering areas outside of Canada; however, some Silver-haired Bats overwinter in British Columbia and around the Great Lakes.



Approximate distribution of Eastern Red Bat based on visual records in green and additional visual records represented with green dots. Data are insufficient to accurately delineate the northern range limits of this species.

Sources: Nagorsen and Nash 1984, Knowles 2005, Brown and Hamilton 2006, Lucas and Hebda 2011, Nagorsen and Paterson 2012, Natural Resource Solutions Inc. 2012, Cebellos 2014, GBIF.org 2020, Government of Alberta 2020, Solick *et al.* 2020, Humber pers. comm. 2023, Canadian Museum of Nature (CMNMA 2822), R Barclay unpub. Data, Klymko pers. comm.

## Habitat

Habitat requirements for these species include foraging, drinking, and roosting habitats, with the latter considered the most limiting. All three species roost in trees; however, Hoary Bats and Eastern Red Bats roost by hanging from branches, and Silver-haired Bats roost in tree cavities or under exfoliating bark.

All three species catch aerial insects while in flight. Foraging habitats vary for all three species but include wetlands, open areas, and edge or gap habitats in forested landscapes.

## Biology

All three bat species migrate seasonally. They are relatively fast flyers that hunt most often in open habitats or along habitat edges and within

canopy gaps in forested landscapes. They are obligate insectivores that prey on aerial insects.

These species are relatively fecund compared to other bats. They likely first give birth in their second year. Hoary Bats and Silver-haired Bats usually have twins, but Eastern Red Bats may have up to four pups.

Vital rates (survival, longevity, age structure, etc.) are mostly unknown but it is inferred from similar, related species that they are relatively long-lived, with maximum lifespans of at least 12–15 years. Generation time is unknown but estimated to be 2–6 years based on IUCN methodology and inferences for similar bats.

## Population Sizes and Trends

The primary means used to assess the relative abundance of bats include mark-recapture studies and emergence counts. However, coordinated North American-wide monitoring for bats (e.g., NABat) has not occurred for long enough in Canada to generate population trend data. Given the limitations, multiple sources of information were used to assess population trends, including carcass searches at wind energy facilities, changes in capture and acoustic detection rates, rabies submission rates, and population viability modelling that relied on expert estimates.

Current population levels for all three species are unknown; however, experts postulated that the most likely population size of Hoary Bats across North America is approximately 2.25 million individuals. Given the similarities in life history and ecology, it was assumed that this estimate can also be broadly applied to Silver-haired Bats and Eastern Red Bats.

In 2007, expert elicitation and projected fatality rates were used to model the effect of wind energy production on Hoary Bat populations in North America. The models were based on variable initial population size, levels of wind energy build-out and fatality rates from the year 2014, along with favourable population growth rates without mortality due to wind turbines. That is, the models only considered additive mortality as a result of fatalities at wind turbines, not other threats. Some plausible models suggested that Hoary Bats will decline by 50% to 90% in the next 50 years, a 1.4% to 4.5% annual decline. The “most likely” demographic scenario predicted that

fatalities associated with wind energy facilities would result in a 90% population decline over 50 years, with a 22% probability of extinction over the next 100 years. Follow-up studies that included population models accounting for projected build-out (with/without mitigation to reduce fatality rates) estimated extinction risk at 0–40% by 2050 based on various build-out scenarios with a midpoint of 20%. These results suggest that significant population declines may have already occurred if the initial Hoary Bat population size was below 3 million individuals. Recently, multiple, independently derived genetic estimates of effective population size for all three species across North America also suggest their current population sizes are well below 3 million. It is expected that similar probabilities apply to Eastern Red Bats and Silver-haired Bats; however, neither of these species has been explicitly modelled.

In support of the decline suggested by population modelling for Hoary Bats, there are multiple lines of evidence to suggest that population declines are occurring in migratory tree-roosting bats including declining capture rates of lasiurine (bats within the genus *Lasiurus*) bats, and a decrease of annual rabies submissions. Change in fatality rates at wind turbines, change in capture and acoustic detection rates, and change in rabies submission rates all suggest declines for all species.

In Ontario, the number of carcasses found under wind turbines during the late summer and autumn migration declined significantly over seven years and recent occupancy modelling in the US Pacific Northwest provides evidence of a decline in the regional occurrence probability of Hoary Bats (2016–2018 relative to 2010). Multi-year acoustic and capture studies also provide evidence for population changes for all three species. In the US, all three species have declined in terms of the proportion of overall bat submissions for rabies testing.

### **Threats and Limiting Factors**

These three bat species face several threats, some of which are common to all bats found in Canada, while others are more specific to these migratory species. Several threats contribute cumulatively to suspected declines for all three species. Based on the IUCN threats calculator, the threats assessment is High to Very High for

Hoary Bats, Eastern Red Bats, and Silver-haired Bats.

Wind energy development is the most immediate and concerning threat. Hoary Bats, followed by Silver-haired Bats, and then Eastern Red Bats, account for most fatalities at wind turbines in Canada. The number and extent of wind energy facilities (hereafter “build-out”) will continue to increase substantially across the range of these species.

The global decline of insects is of particular concern for these bats, which are obligate insectivores, as it is for migratory birds, which are aerial insectivores. The causes of insect declines are likely multifactorial, cumulative, and difficult to reverse. While long-term abundance data do not exist for migratory bats, they are likely just as affected by widespread declines in prey as birds with similar diets are.

Other threats include chemical and noise pollution, as well as deforestation that results in the loss of roosting habitat. However, these threats are considered to have a low impact over the next three generations for all three species.

### **Protection, Status and Ranks**

None of these bats receive special protection in Canada, except in Quebec where they are included on the Liste des espèces susceptibles d’être désignées menacées ou vulnérables (list of wildlife species likely to be designated threatened or vulnerable). Quebec is also the only province to have established a recovery strategy for Eastern Red Bats. In most jurisdictions, in conjunction with other wildlife, they are provided general protection by provincial and territorial wildlife acts. In 2018, Hoary Bats and Eastern Red Bats were added to Appendix II of the Convention on Migratory Species (CMS) based on their “unfavourable conservation status” related to the rapid expansion of wind energy and the need for international cooperation for their conservation.

All three species are ranked as Least Concern in the IUCN Red List, but key threats identified in this assessment were not considered. In contrast, NatureServe’s global status (G ranks) for all three species is G3G4, rounded to G3 (Vulnerable). The national status (N ranks) for all of these bats in Canada by NatureServe is N5B, NUM; that is,

the breeding population is assessed as Secure, while the status of the migratory population is Undetermined. The status of each of these three bat species assessed in each province, territory, or state (S ranks) is variable, likely reflecting more about the state of knowledge in each jurisdiction rather than their actual conservation status.

Source: COSEWIC. 2023. COSEWIC assessment and status report on the Hoary Bat *Lasiurus cinereus*, Eastern Red Bat *Lasiurus borealis* and the Silver-haired Bat *Lasionycteris noctivagans*, in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. xxi + 101 pp

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[Enviroinfo@ec.gc.ca](mailto:Enviroinfo@ec.gc.ca)



# Hoary Bat

Photo: © Sheri Fenton and Brock Fenton



**Scientific name**  
*Lasiurus cinereus*

**Taxon**  
Mammals

**COSEWIC status**  
Endangered

**Canadian range**  
British Columbia, Alberta, Saskatchewan, Manitoba, Ontario, Québec, New Brunswick, Nova Scotia, Prince Edward Island, Newfoundland and Labrador, Yukon, Northwest Territories

**Reason for designation**  
This large-bodied bat has light yellow-brown fur on its face and neck and white tipped hairs over most of its body. It is found across Canada in the summer months and during fall migration. Seasonal migration exposes individuals to a variety of threats including a high risk of mortality at wind energy facilities. Although there is considerable uncertainty regarding the exact rates of decline for these bats across Canada, declines in carcass counts at wind energy facilities suggest declines far in excess of 50% over three generations. The planned increase in wind power capacity will increase this threat but mitigation is possible. Population viability modeling estimates the probability of extinction is least at the 20% threshold by 2050 (3 generations). Additional threats to this species

include ongoing and widespread declines in insect abundance, loss of forested roosting and foraging habitat, and pollution.

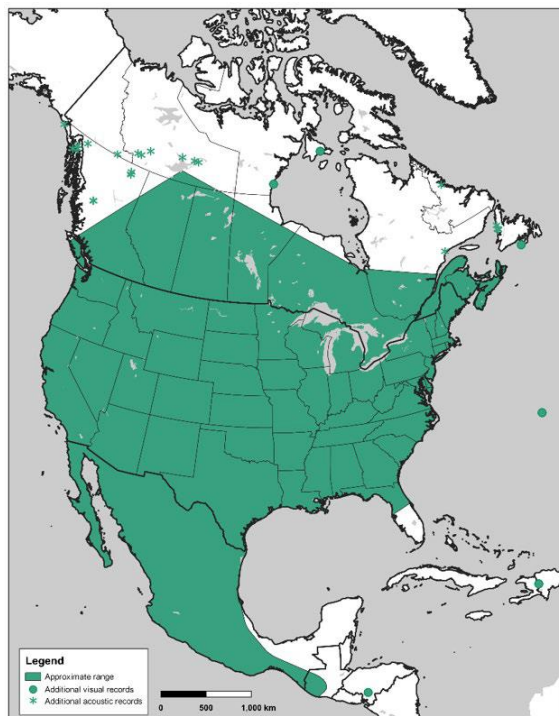
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Approximate distribution of Hoary Bat based on visual records in green, additional visual records represented with green dots, and additional acoustic records represented with an asterisk. Data are insufficient to accurately delineate the northern range limits of this species. Winter range based on Cryan and Veilleux (2007) but not differentiated in this figure.

Source: Hitchcock 1943, Shump and Shump 1982, Anand-Wheeler 2002, Maisonneuve *et al.* 2008, Stantec Consulting Ltd 2012, Blejwas *et al.* 2014, Mora and López 2014, Slough *et al.* 2014, Wilson *et al.* 2014, Hansen *et al.* 2018, de Lacoste and SFEPM 2020, Faure-Lacroix *et al.* 2020, GBIF.org 2020, Washinger *et al.* 2020, Rae and Lausen 2021, Slough *et al.* 2022, Humber pers. comm. 2023, New Brunswick Museum (NBM-5801, NBM-1202).

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## Threats and Limiting Factors

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migratory species. Several threats contribute cumulatively to suspected declines for all three species. Based on the IUCN threats calculator, the threats assessment is High to Very High for Hoary Bats, Eastern Red Bats, and Silver-haired Bats.

Wind energy development is the most immediate and concerning threat. Hoary Bats, followed by Silver-haired Bats, and then Eastern Red Bats, account for most fatalities at wind turbines in Canada. The number and extent of wind energy facilities (hereafter “build-out”) will continue to increase substantially across the range of these species.

The global decline of insects is of particular concern for these bats, which are obligate insectivores, as it is for migratory birds, which are aerial insectivores. The causes of insect declines are likely multifactorial, cumulative, and difficult to reverse. While long-term abundance data do not exist for migratory bats, they are likely just as affected by widespread declines in prey as birds with similar diets are.

Other threats include chemical and noise pollution, as well as deforestation that results in the loss of roosting habitat. However, these threats are considered to have a low impact over the next three generations for all three species.

## Protection, Status and Ranks

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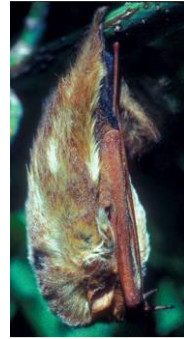








# Hoary Bat and Eastern Red Bat



## Proposed status of Endangered

We would like your input on the proposed status for Hoary Bat and Eastern Red Bat as Endangered on the List of Wildlife Species at Risk under the federal *Species at Risk Act* (SARA). Since adding or reclassifying species on the SARA List may affect the way you or your community, nation, business or organization interact with the species, the Minister wants to know what these changes could mean to you. It could be that you need to know that the species will be there for future generations, but you also may have concerns about your future activities. Your comments will help the Minister understand what the changes to the SARA List would mean to you.

The following questions are intended to assist you in providing comments. They are not meant to be limiting and any other comments you may have are welcome.

*By completing this questionnaire, you understand that this information will be used to inform the Minister of Environment in their recommendation to the Governor in Council. Any information provided here will be shared and could be shared in the public realm.*

**Please send completed forms to Rhiannon Pankratz, Northern Liaison Biologist.**

**Email: [SARA.North@ec.gc.ca](mailto:SARA.North@ec.gc.ca)**

**Please send forms by December 15, 2023**

**Name (First and Last Name):** \_\_\_\_\_

**If you are representing an organization please provide the name of the organization:**

\_\_\_\_\_

**Date:** \_\_\_\_\_

Have you seen the Hoary Bat in your area? Yes  No

If yes, where have you seen them? \_\_\_\_\_  
\_\_\_\_\_



Have you seen it often? Yes  No

What is your or your organization's position/opinion on the proposed status of Hoary Bat as Endangered?

- Support the proposed status of Hoary Bat as Endangered
- Do not support the proposed status of Hoary Bat as Endangered
- Indifferent to the proposed status of Hoary Bat as Endangered

Have you seen the Eastern Red Bat in your area? Yes  No

If yes, where have you seen them? \_\_\_\_\_  
\_\_\_\_\_



Have you seen it often? Yes  No

What is your or your organization's position/opinion on the proposed status of Eastern Red Bat as Endangered?

- Support the proposed status of Eastern Red Bat as Endangered
- Do not support the proposed status of Eastern Red Bat as Endangered
- Indifferent to the proposed status of Eastern Red Bat as Endangered

Do you need more information from Environment and Climate Change Canada to make your decision?

Yes  No

**What do these species and their habitats mean to you or the group for which you are responding?**

**Could you describe your or your group's relationship with these species (e.g., cultural, spiritual, ceremonial, practicing rights, health, wellbeing, livelihood)?**

**How might your relationship with these species change if this proposed status goes through?**

**Could the recovery of these species support your livelihood, or well-being? Yes  No**

**Do you have any additional comments?**









Δεῦτε ἵνα ἴδωμεν τὰ σημεῖα σου, ἵνα πιστεύσωμεν σοι.



Archived: Monday, January 29, 2024 3:18:46 PM

From: [Machtans, Craig \(ECCC\)](#)

Sent: Monday, December 11, 2023 3:02:32 PM

To: [Pynn, Jonathan](#)

Cc: [Svoboda, Michael \(ECCC\)](#); [Pankratz, Rhiannon \(elle, la | she, her\) \(ECCC\)](#); [Ringrose, John](#); [MacDonald, Bruce \(ECCC\)](#); [Gissing, Drikus](#)

Subject: RE: FOR COMMENT: Proposed SARA amendments Eastern Red Bat, Hoary Bat and Silver-haired Bat (Due: January 15, 2024)

Sensitivity: Normal

Hi Jonathan –

Thanks for this, appreciate your specific comments. We're planning for the March 2024 NWMB meeting.

Craig

From: Pynn, Jonathan <JPynn@GOV.NU.CA>

Sent: Monday, December 11, 2023 7:22 AM

To: Machtans, Craig (ECCC) <Craig.Machtans@ec.gc.ca>

Cc: Svoboda, Michael (ECCC) <Michael.Svoboda@ec.gc.ca>; Pankratz, Rhiannon (elle, la | she, her) (ECCC) <Rhiannon.Pankratz@ec.gc.ca>; Ringrose, John <JRingrose@GOV.NU.CA>; MacDonald, Bruce (ECCC) <BruceA.MacDonald@ec.gc.ca>; Gissing, Drikus <DGissing@GOV.NU.CA>

Subject: RE: FOR COMMENT: Proposed SARA amendments Eastern Red Bat, Hoary Bat and Silver-haired Bat (Due: January 15, 2024)

Hi Craig,

After discussing this internally, please see the GN's comments and position below.

For planning purposes, is there a general idea which NWMB meeting this will be brought to?

*The Government of Nunavut has reviewed the limited information provided in support of the uplisting for Eastern Red Bat and Hoary Bat; as there are no reports for Silver-haired bats in Nunavut we are not providing comments on their proposed listing other than a general support for following the species listing process.*

*The Nunavut Department of Environment is not currently conducting bat research in Nunavut but will report to ECCC should these species be observed in Nunavut. As stated, there have been some recorded instances of these bat species in Coral Harbour and Arviat; anecdotal evidence is that these recorded sightings are not evidence of range expansion into Nunavut, rather a result of accidental introduction via shipping containers.*

*We support the efforts of the Government of Canada in their conservation efforts and have no objections should these species be considered by the federal Minister of Environment and Climate Change Canada for listing under the Species at Risk Act.*

If there are any questions on this, please feel free to reach out.

Thank you,

Jonathan

**Jonathan Pynn**

Senior Wildlife Advisor  
Department of Environment  
Government of Nunavut

Senior Wildlife Advisor  
Department of Environment  
Government of Nunavut

Angijukhiq Uumajuliqikkut  
Uqaujiji  
Avatiliqiyikkut  
Nunavut Kavamangat

Conseiller principal en conservation de la faune  
Ministère de l'Environnement  
Gouvernement du Nunavut



PO Box 1000, Stn. 1370 Iqaluit, Nunavut, X0A 0H0  
867-975-7793  
[jpynn@gov.nu.ca](mailto:jpynn@gov.nu.ca)

From: Machtans, Craig (ECCC) <[Craig.Machtans@ec.gc.ca](mailto:Craig.Machtans@ec.gc.ca)>

Sent: Tuesday, November 21, 2023 11:48 AM

To: Gissing, Drikus <DGissing@GOV.NU.CA>

Cc: Pynn, Jonathan <JPynn@GOV.NU.CA>; Svoboda, Michael (ECCC) <Michael.Svoboda@ec.gc.ca>; Pankratz, Rhiannon (elle, la | she, her) (ECCC) <Rhiannon.Pankratz@ec.gc.ca>; Ringrose, John <JRingrose@GOV.NU.CA>; MacDonald, Bruce (ECCC) <BruceA.MacDonald@ec.gc.ca>

Subject: FOR COMMENT: Proposed SARA amendments Eastern Red Bat, Hoary Bat and Silver-haired Bat (Due: January 15, 2024)

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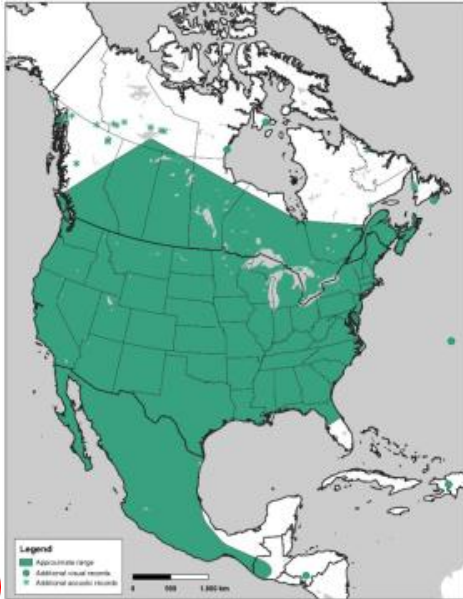

Hi Drikus,

Every year the Government of Canada receives the scientific assessments of terrestrial species by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) and consults about their addition to Schedule 1 of the *Species At Risk Act* (SARA) or to have their current status changed. For 2024, there are 2 terrestrial species, the [Eastern Red Bat](#) and [Hoary Bat](#) which have been recorded in Nunavut, but well outside the known breeding range, and are being considered for addition. Both species were assessed as Endangered. There is uncertainty around the exact rates of declines. However, despite this uncertainty, carcass counts at wind energy facilities in Ontario during their migration suggest that the declines for all three species are far in excess of 50% over three generations, and COSEWIC believes that this could be true across the country. Given these dramatic declines, Environment and Climate Change Canada (ECCC) would like to accelerate the consultations on the possibility to add these bats to the *Species at Risk Act's* Schedule 1.

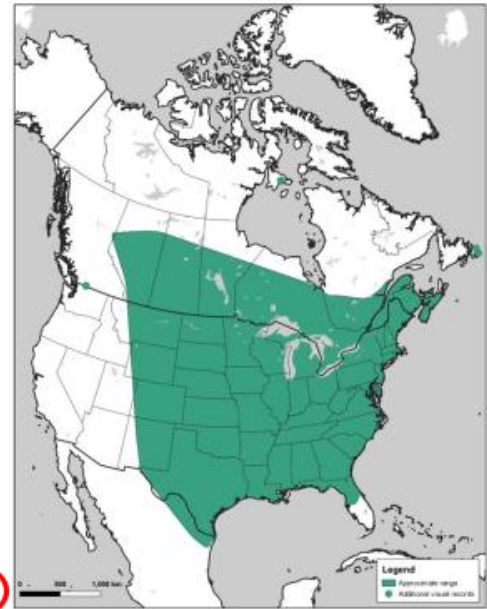
At this time, we are seeking comments and a position on the proposed listing for the 2024 species. It is my assumption that you will solicit the input of other Government of Nunavut departments as necessary and will provide comments on behalf of the Government of Nunavut.

Hunter and Trapper Organizations, Regional Wildlife Boards and Inuit Associations, and Nunavut Tunngavik Incorporated also being consulted separately at the same time.

Briefly, the species found in Nunavut included in the proposed amendments to Schedule 1 are:

Species	Status	Reason for listing and Implications	Nunavut Range
 <a href="#">Species Information (SARA Registry)</a>	Under consideration for addition to list.  New Proposed (COSEWIC) status – <b>Endangered</b> (2023)  Current (Schedule 1) status SARA – Not listed	This species was assessed as endangered due to steep declines, over 50% over three generations. The primary threat to this species is mortality at wind energy facilities. Wind power capacity is expected to increase but this threat can be mitigated.  If listed as Endangered, a national Recovery Strategy will be required, including identification of critical habitat.	 It occurs irregularly in Nunavut. It has been reported near Arviat and Coral Harbour (see red circles). The regular breeding range excludes Nunavut.
	Under consideration for addition to list.  New Proposed (COSEWIC) status – <b>Endangered</b> (2023)  Current (Schedule 1) status SARA – Not listed	This species was assessed as endangered due to steep declines, over 50% over three generations. The primary threat to this species is mortality at wind energy facilities. Wind power capacity is expected to increase but this threat can be mitigated.  If listed as Endangered, a national Recovery Strategy will be required, including identification of critical habitat.	

[Species Information \(SARA Registry\)](#)



It occurs irregularly in Nunavut. It has been recorded in Coral Harbour (see red circle). The regular breeding range excludes Nunavut.

For more information please refer to the attached “Consultation on Amending the List of Species under the Species at Risk Act: Terrestrial Species” for 2024. These documents explain the process and contain the species profiles for the species found in Nunavut under consideration.

Given the steep decline of these species, we are conducting consultations on the proposed listing of these species quicker than we normally would. We would appreciate if you could provide comments by **January 15<sup>th</sup>, 2024**. If you require additional time, please inform us prior to the requested deadline. Our intent is to present these species at the first meeting of the Nunavut Wildlife Management Board in 2024 (March). Comments can be submitted until we present at that meeting.

Please contact Rhiannon Pankratz, Northern Liaison Biologist, ([Rhiannon.pankratz@ec.gc.ca](mailto:Rhiannon.pankratz@ec.gc.ca), 867-445-7927) directly if you would like to provide comments or if you have questions about the SARA process or the species under review.

Please indicate if you support the listing of these species under SARA. We would appreciate your response by **January 15<sup>th</sup>, 2024**.

Yours sincerely,

Craig

Craig Machtans  
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