



**MAY 18 2017**

Mr. Dan Shewchuk  
A/Chairperson of the Nunavut Wildlife Management Board  
1106 Ikaluktuutiak Road, Allavvik Building, 3rd Floor  
P.O. Box 1379, Iqaluit, NU X0A 0H0

Dear Mr. Shewchuk:

I am writing in response to your correspondence of April 13, 2017 to the Honourable Catherine McKenna, Minister of Environment and Climate Change regarding invited written submissions and the opportunity to attend a public hearing regarding the Nunavut Department of Environment's revised Nunavut Polar Bear Co-Management Plan.

Thank you for the opportunity to comment and participate in this process. General comments are provided below while more detailed information, including page- and section-specific suggestions for clarification and revision are included in the attached enclosure on behalf of Environment and Climate Change Canada (ECCC).

An ECCC departmental representative (Dr. Sam Iverson) will be present at the public hearing on June 8, 2017 to present ECCC's submission and answer any questions that arise. As per the suggestion of the Nunavut Wildlife Management Board, ECCC will gladly share a presentation and response session at the public hearing with colleagues from Parks Canada Agency.

### **General comments**

While it is recognized that the Plan has evolved and been improved significantly since the last iteration, our review identified three priority topics for suggested further revision. These topics warrant further attention with the aim to improve Canada's ability to communicate a stewardship message and demonstrate a commitment to responsible management both domestically and internationally. Specifically: (1) clarifying the goal and conservation objectives of the Plan, (2) addressing the observed and projected impacts of climate change on polar bear subpopulations more equitably, and (3) restructuring the document to separate threats to the population from challenges in implementing the Plan.

#### **(1) Goal and conservation objectives of the Plan**

The Introduction to the Plan casts the polar bear in Nunavut as a species for which the primary concern is population maintenance or reduction in response to public safety concerns and damage to the ecosystem. This characterization is inconsistent with the federal listing of the polar bear as a species of Special Concern in Canada and at various levels of at-risk in several of Canada's provinces and territories. While polar bears are not listed as an at-risk species in Nunavut and stakeholders in Nunavut may not be in uniform agreement about the threats identified in the *National Polar Bear Conservation Strategy for*

Canada (2011), it is nonetheless important that the Co-Management Plan demonstrate an appreciation and understanding of these threats and willingness to take management action should it be deemed necessary by Nunavut wildlife management authorities. The conservation goal stated in Section 3 of the Plan: "To maintain viable and healthy polar bear subpopulations for current and future generations, and to ensure that polar bears remain an integrated and functioning part of the ecosystem while monitored and appropriate harvests are allowed" is appropriate. However the Introduction should highlight the program that is in place to monitor polar bear status and trends and assure interested parties that appropriate management actions will be taken if significant declines occur.

## **(2) Climate change**

The issue described above is particularly pertinent with respect to ongoing climate change in the North and, in particular, its impacts with respect to projected declines in sea ice coverage. The Committee on the Status of Endangered Wildlife in Canada (COSEWIC) recommendation that Canada list the polar bear as a species of Special Concern was based primarily on projected sea ice decline and the potential impact that longer ice-free seasons could have on polar bear foraging ecology and population viability. A key consideration is that the projected declines in sea ice coverage go well beyond what has been observed by both Inuit living in the North and scientists and, thus a precautionary approach to management is advised. It is ECCC's view that a management plan that does not seriously consider the potential negative impacts of climate change on polar bears over both the short- and long-term does not demonstrate due diligence with respect to threat identification and mitigation.

## **(3) Threats and challenges**

As suggested in ECCC's previous review of Nunavut's Polar Bear Co-Management Plan, it is recommended that the description and assessment of threats be separate from the challenges. Threats are defined as the proximate activities or processes that have caused, or may cause in the future the destruction, degradation, and/or impairment of the species being assessed. Naturally limiting factors such as aging or disease are not normally considered threats unless they are altered by human activity. Thus, issues such as habitat alteration from climate changes or disturbances from shipping qualify as threats. In contrast, challenges that complicate the implementation of management actions, such as overlapping jurisdictional responsibilities, are not in and of themselves threats. Managing threats is best accomplished when they are classified, ranked, and specific management actions are identified for each threat to mitigate or alleviate its impact. ECCC's suggestion is to divide Section 7 into separate sections for "Threats" and "Management Challenges" and for greater attention to be paid to threat assessment and prioritization.

In closing, I would like to commend the Nunavut Department of Environment for its ongoing commitment and significant effort to develop a polar bear management plan for the territory. With some revisions, I am confident that the Plan will satisfy the needs of the territory and allow for incorporation into the national SARA management plan. I wish the Nunavut Wildlife Management Board well in completing this challenging work and finalizing a decision regarding this proposed Plan.

Sincerely,



Robert McLean  
Director General, Assessment and Regulatory Affairs  
Canadian Wildlife Service

Enclosure:

Detailed ECCC page and section specific comments table