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May 19, 2017

Daniel Shewchuk  
A/Chairperson  
Nunavut Wildlife Management Board  
P.O. Box 1379  
Iqaluit, NU X0A 0H0

**RE: Public Hearing of the Nunavut Wildlife Management Board concerning the revised Nunavut Polar Bear Co-Management Plan**

Mr. Chairperson,

This letter is in response to your invitation of April 13, 2017 to provide submissions and participate in the public hearing to consider the revised Nunavut Polar Bear Co-Management Plan (Plan), developed by the Government of Nunavut. Thank you for the opportunity to participate in this important process; below is a broad overview provided on behalf of the Parks Canada Agency – Nunavut Field Unit.

First, I commend the NWMB and Government of Nunavut for being open to following a modified approval process over the past year and a half; it has resulted in a vastly improved Plan. Parks Canada acknowledges the Government of Nunavut's hard work and dedication to develop an immensely important plan that covers a vast area with such an array of stakeholder and public opinions.

As a manager of over 110,000 square kilometers of land within Nunavut, Parks Canada has a significant responsibility in the management of polar bears and their habitat. There are many examples of terrestrial and marine habitat managed by Parks Canada that is particularly sensitive and important to certain life history stages of polar bears. Some examples are the northern and eastern fiords of Auyuittuq National Park contain substantial denning areas; the coastal areas of Ukkusikasalik and Sirmilik National Parks are heavily used summering areas for polar bears of the Foxe Basin and Baffin Bay subpopulations, respectively.

The conservation of significant species, such as polar bears, and their habitat plays a central role within Parks Canada in Nunavut and nationally, and is a key component of our mandate:

*“On behalf of the people of Canada, we protect and present nationally significant examples of Canada's natural and cultural heritage, and foster public understanding, appreciation and enjoyment in ways that ensure the ecological and commemorative integrity of these places for present and future generations.”*



Our mandate is to also present these significant examples of Canada's natural place to the public; thus, Parks Canada also has the important role of developing responsible tourism opportunities for Canadians. A primary concern when developing these opportunities is the need to ensure not only the safety of visitors, but also of polar bears, and managing the risk of bear-human conflict. To ensure this, Parks Canada continues to work closely with other federal and territorial government departments, non-government organizations, outfitters, and communities to develop bear safety programs, and tourism opportunities that are as informed as possible to reduce conflict and educate visitors on bear protection.

Being a federal authority, Parks Canada also has major responsibility in implementing the Species at Risk Act, including working closely in support of Environment and Climate Change Canada, which is leading the development of the National Polar Bear Management Plan. Collaboration between territorial and federal government will also be immensely valuable in the development of this national plan, ensuring it can also be implemented throughout the range of polar bears.

The following attachment includes detailed comments on the Plan; again, thank you for the opportunity to participate in the public hearing. We are encouraged by the progress in the development of the Plan and look forward to continuing to work with the Nunavut Wildlife Management Board, Government of Nunavut, Environment and Climate Change Canada, other co-management partners and the public to ensure successful sustainable management and long-term conservation of an iconic species.

Sincerely,

Jenna Boon

Field Unit Superintendent

Attachments - 1



## **Appendix 1 – Parks Canada comments on the revised Nunavut Polar Bear Co-Management Plan**

Prepared by: Peter Kydd, Acting Resource Conservation Manager, Nunavut Field Unit, Parks Canada Agency

Date: May 19, 2017

The revised Nunavut Polar Bear Co-Management Plan is greatly improved, for which the Government of Nunavut should be applauded. As always, the Government of Nunavut has done a great job respecting community input throughout the consultation process and incorporating local views and recommendations within the Plan. The Government of Nunavut has also done a great job of balancing Inuit Qaujimagatuqangit and science in the Plan. However, there are outstanding issues that are of concern with several components of the Plan. Many of these concerns are consistent with those of Environment and Climate Change Canada; generally, we are supportive of the detailed submission provided by Environment and Climate Change Canada.

### *Missed Opportunity for Collaboration*

While in the revised Plan, Parks Canada has been included within the description of co-management partners and their roles, the continued absence of consultation and collaboration between the Government of Nunavut and Parks Canada is clear. Parks Canada manages a significant amount of land in Nunavut, much of which contains sensitive Polar Bear habitat. As Polar Bear is a federally listed species at risk, Parks Canada plays an important role in the development and implementation of a National Management Plan under the Species at Risk Act. Greater coordination between federal and territorial government departments would lead to a strengthened co-management system, reflected in effective territorial and federal management plans, collaborative use and sharing of resources and expertise, and a healthy, well-managed Polar Bear population.

### *Management for Status Quo*

Parks Canada appreciates the inclusion of the most recent Polar Bear Technical Committee Status Table. However, there is still no discussion or rationale pertaining to why all subpopulation recommendations are to Maintain current population abundance and review management objectives and TAH when a new inventory study is complete. The PBTC Status Table clearly indicates that several populations are not stable, either decreasing (increasing the risk to bear survival), increasing (potentially increasing the risk to humans) or are uncertain; should these subpopulations not be managed accordingly, including taking the precautionary approach?

### *Citation of Research*

The current draft of the Plan has done an insufficient job of citing literature throughout the document. It is encouraging to see a list of literature reviewed in the appendix of the Plan, but the lack of citations throughout document does not assist the reader in understanding what information, both from the scientific and Inuit Qaujimagatuqangit perspective, has been drawn



from where. Citing references through documents is consistent practice with recovery documents and management plans produced by other territorial, provincial and federal governments and would be greatly beneficial in this context.

### *Threats and Challenges*

While there are some linkages between threats to Polar Bears and challenges in Polar Bear management, the inclusion of threats and challenges in one category seems odd; they have drastically different definitions and should be clearly distinguished from one another. Specifically, by understanding the descriptions of and concerns surrounding denning, population boundaries, and inter-jurisdictional considerations, these are obvious challenges in management. The remaining are the clear threats, and should be grouped accordingly.

### *Climate Change*

As indicated in Parks Canada's review during the initial written hearing of the Plan, there is still substantial concern with the lack of discussion or reference to climate change and the impacts on polar bears. There is a growing body of peer reviewed literature that speaks to these changes and impacts on polar bears in Canada. The international community recognized climate change as the most significant threat to polar bears, and is explicitly stated in several agreements between jurisdictions. As stated before, this could impact Canada's reputation as leaders in polar bear conservation and provide other jurisdictions the opportunity to scrutinize polar bear management in Canada.

### *Implementation of the Plan*

The description of Management Actions to be taken to reach each of the Management Plan Objectives is important, especially the revisions that have added priority levels and timelines to each action. Understanding that there are many actions to be completed, most within 3-5 years, this may be an opportune place to facilitate collaboration between co-management partners. Including an additional column, or description in the text preceding the tables, identifying key partners in achieving each action would identify areas where the Government of Nunavut will be looking to co-management partners, including Parks Canada and Environment and Climate Change Canada for assistance. To complete all management actions within the timelines indicated in the Plan, it is anticipated that the Government of Nunavut will need to work closely with co-management partners.

Parks Canada also sees value in the Government of Nunavut including, in the communications strategy for public outreach for bear safety, general information on the status of polar bears, and the need for conservation initiatives. Harvest management is in place for conservation purposes, delivering the message as to why there is a need for conservation is highly important, and will increase public awareness.

### *Summary*

Generally, this Plan is largely improved from the 2015 draft; however there is still room for improvement. Of greatest concern are the lack of consultation and collaboration between Parks



Canada, Environment and Climate Change Canada and the Government of Nunavut; management for the status quo; and, the unsatisfactory description of threats from climate change. With improvements in these areas, Nunavut Polar Bear Co-Management Plan will be a strong guiding document, which will be smoothly implemented, and well respected throughout the polar bear management community.