



Nunavut Field Unit
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October 6, 2015

Ben Kovic
Chairperson
Nunavut Wildlife Management Board
P.O. Box 1379
Iqaluit, NU XoA oHo

**Re: NWMB Written Hearing concerning the Nunavut Polar Bear
Co-Management Plan**

Mr. Chairperson,

This letter is in response to the September 4th, 2015 invitation for submissions to the written hearing of the Nunavut Wildlife Management Board concerning the proposed Nunavut Polar Bear Co-Management Plan.

There are several reasons why polar bear co-management in Nunavut is of importance to Parks Canada and why the inclusion of Parks Canada in the development of territorial plans and polar bear management in the territory is of importance.

Conservation of endemic species and their habitat for future generations of Canadians is a key part of Parks Canada's 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."

In support of this mandate, Parks Canada cooperatively manages five national parks in Nunavut that are located within the range of polar bears. These national parks include 110,000 square kilometers of land and marine areas spread across

four subpopulations and the Arctic Basin. The Nunavut national parks protect areas of important denning habitat and movement corridors for polar bears.

Parks Canada also plays an important role in developing opportunities for responsible tourism in the territory and managing the risk of polar bear encounters for visitors and all park users. For this reason, Parks Canada works closely with other government departments, non-government organizations, outfitters, and communities to develop and deliver bear safety programs that are informed by Inuit knowledge and that reduce bear/human encounters.

Finally, in addition to Parks Canada's role as a land manager and tourism/safety partner in Nunavut, Parks Canada also has a role nationally in implementing the *Species at Risk Act* and working closely with Environment Canada to ensure that this legislation is upheld in national parks. As a Species of Special Concern, polar bears require a National Management Plan, in which Parks Canada will play a supporting role to Environment Canada in developing and ensuring that the plan can be implemented in national parks across the country.

For these reasons, we hope that the attached comments (Appendix 1) on the Nunavut Polar Bear Co-management Plan are welcomed and considered to the extent possible. We look forward to working with the Nunavut Wildlife Management Board, Government of Nunavut, Environment Canada, and all co-management partners to manage polar bears for their long-term conservation and enjoyment by Inuit and all Canadians.

Sincerely,



Jenna Boon
Field Unit Superintendent

Appendix 1 - Parks Canada comments on the Nunavut Polar Bear Co-management Plan

Prepared by: Andrew Maher, Resource Conservation Manager, Nunavut Field Unit, Parks Canada Agency

Date: Oct. 8, 2015

General Comments

The Government of Nunavut deserves credit in creation of this management plan because its development has been inclusive of communities and their knowledge and perspectives. There are, however, issues related to the content of the management plan that may open it to criticism with other jurisdictions within and outside of Canada, and may ultimately make the management of polar bears more challenging in Nunavut:

Inadequate representation of research

The plan does a good job of describing the knowledge and concerns of the communities but it is lacking a summary of the significant body of research that has occurred for polar bear in Nunavut. Both Inuit knowledge and academic literature used to inform this plan require much better referencing so that the plan can withstand public scrutiny.

Insufficient discussion of threats

The "Conservation Issues and Challenges" section does a poor job of describing and discussing the threats for polar bears. This is most acute in the section on climate change which is recognized internationally as the most significant threat to polar bears and referenced significantly in agreements between jurisdictions. The lack of discussion or reference to climate change and the impacts on polar bears throughout this document sets it apart from other plans and agreements on the species.

Of specific concern to Parks Canada is the grouping of industrial activity and tourism into one brief subsection. Granted that both can have conservation concerns associated with them and can contribute to cumulative impacts on bears, the scale and the impact of these concerns at present time are so different that they deserve individual treatment in the document. Large industrial projects and their associated activities have the potential to impact bears throughout and across a subpopulation or even to impact several subpopulations, whereas tourism activities at present limited in specific areas with impacts on individual bears or small areas of a subpopulation.

Missed Opportunity for Collaboration

Environment Canada and Parks Canada are mentioned infrequently and with great brevity in this document as partners in the conservation of the species. As significant land managers in Nunavut, both Parks Canada and Environment Canada (Canadian Wildlife Service) manage large areas within the territory which includes important denning sites and movement corridors. Furthermore, both

organizations have a role to play nationally in the conservation of the species and since the hope is that this plan can become a part of a National Management Plan under SARA, the lack of inclusion in the process of developing the plan and mention in the document itself will make this more challenging. Although there does not appear to be any direct conflict between the plan and the mandate of Parks Canada, the lack of details in Appendix C with regards to actions to support the plan may make it difficult to dedicate resources to assist in its implementation, or at very least it does not lend itself well to an integrated management approach for the species across jurisdictions/boundaries.

Management for status quo

Appendices A and B summarize the state of subpopulations using what appears to be an out of date Polar Bear Technical Committee (PBTC) Status Table and does not include the detailed definitions associated with the PBTC status table which help the reader interpret the terms used. It is paramount that the most recent and complete table is used in this plan. Furthermore, there is no discussion how the status and trend of subpopulations have influenced the approach taken in this plan to manage all subpopulations in Nunavut to maintain the current abundance. The reasoning behind managing the subpopulations for maintenance and not growth especially for reduced or data deficient ratings of status or declining or data deficient trend is required since this approach will be scrutinized by other jurisdictions.

Summary

Although there do not appear to be any direct conflicts between this plan and the mandate of Parks Canada or our ability to manage the national parks in Nunavut, we are concerned about the impact this plan could have on Canada’s reputation as leaders in polar bear conservation. Furthermore, in order for this plan to become adopted to form part of a SARA National Management Plan for polar bears in Nunavut, we suggest improvements in the discussion of threats, clarity of action items, and balance of knowledge sources will be required. Additional detailed comments are provided in the table below (Table 1).

Table 1. Detailed Comments:

Page	Paragraph	Line	Comment
1	3	2	There is no definition of stakeholder in the document. It is not clear here or elsewhere in the document if OGDs are considered stakeholders, partners, or something else.
2	1	1	It is not clear why EC and PCA are not considered co-management partners. Both manage lands in Nunavut of importance to polar bears and have a role in implementing the SARA.

Page	Paragraph	Line	Comment
5	1	10-13	Where are the references to support the idea that maintenance or reduction of populations may be required? Where is the references on detrimental impacts of polar bear overabundance on the ecosystem or the evidence of overabundance?
5	2	15	Again, references to the source of these statements would be useful given that they contradict.
5-6			Introduction – The language in this section is overly divisive. A more collaborative language and working together to change perceptions may be more productive in advancing the goals of the plan.
12			Section 6 – No mention of the role of federal departments (PCA/EC/others). Although the role in not necessarily as co-management partners, this is a missed opportunity for these departments to see themselves in this plan.
13	4		Industrial activity and tourism should be separated into two subsections due to their scale and impact.
15	2	3	This statement is true, and reinforces the need to include managers of protected areas in the development of this plan.
24	Bullet 4		This is point should also be reflected in the “within Nunavut” section since PCA and CWS both are land managers in the territory.
26			This appears to be an old version of the PBTC table and it does not include the definitions which are required to interpret the table.
27-33			All sub-populations will be managed to maintain current population abundance. Does this mean maintain all current TAHs? Is this approach supported by the significant research program in place? Should this be the approach for data deficient bears if a precautionary approach is listed in the guiding principles of the plan?
33	Appendix C		Overall this section lacks timelines and details to ensure they are completed within the life of this plan. Reference to the contributors to specific actions would be useful as well. This will likely be required for a future National Management Plan under SARA.

ወይም ስነ-ምግባር ስርዓት ለማሳካት ለሚያስፈልጉት ሰው ለማግኘት ለሚችሉ ሰዎች (በስነ-ምግባር 1)።

በስነ-ምግባር 1. ስነ-ምግባር ወይም ስነ-ምግባር:

የሰው ስም	በስነ-ምግባር ስም	ወይም የደረጃው ስም	ስነ-ምግባር
1	3	2	ጋራ ስነ-ምግባር ለሰነድ ስርዓት ለማሳካት ለሚያስፈልጉት ሰው ለማግኘት ለሚችሉ ሰዎች (በስነ-ምግባር 1)።
2	1	1	ጋራ ስነ-ምግባር ስርዓት ለማሳካት ለሚያስፈልጉት ሰው ለማግኘት ለሚችሉ ሰዎች (በስነ-ምግባር 1)።
5	1	10-13	ወይም ስነ-ምግባር ስርዓት ለማሳካት ለሚያስፈልጉት ሰው ለማግኘት ለሚችሉ ሰዎች (በስነ-ምግባር 1)።
5	2	15	የሰው ስም ስርዓት ለማሳካት ለሚያስፈልጉት ሰው ለማግኘት ለሚችሉ ሰዎች (በስነ-ምግባር 1)።
5-6			ወይም ስርዓት ለማሳካት ለሚያስፈልጉት ሰው ለማግኘት ለሚችሉ ሰዎች (በስነ-ምግባር 1)።
12			የሰው ስም ስርዓት ለማሳካት ለሚያስፈልጉት ሰው ለማግኘት ለሚችሉ ሰዎች (በስነ-ምግባር 1)።

ረገጽ/ገጽ	በገጽ/ገጽ ቆይታ	ደብዳቤ ቁጥር	ጥያቄ
			ለልዩነት/ጥያቄ ለማስፈጸም ለሚያስፈልጉት ሰነድ/ጽሑፍ ለማግኘት.
13	4		ለገንዘብ/ገንዘብ ለማስፈጸም ለሚያስፈልጉት ሰነድ/ጽሑፍ ለማግኘት ለሚያስፈልጉት ሰነድ/ጽሑፍ ለማግኘት.
15	2	3	ርዕድ ለማስፈጸም ለሚያስፈልጉት ሰነድ/ጽሑፍ ለማግኘት ለሚያስፈልጉት ሰነድ/ጽሑፍ ለማግኘት.
24	ርገጽ 4		ርዕድ ለማስፈጸም ለሚያስፈልጉት ሰነድ/ጽሑፍ ለማግኘት ለሚያስፈልጉት ሰነድ/ጽሑፍ ለማግኘት.
26			ርዕድ ለማስፈጸም ለሚያስፈልጉት ሰነድ/ጽሑፍ ለማግኘት ለሚያስፈልጉት ሰነድ/ጽሑፍ ለማግኘት.
27-33			ርዕድ ለማስፈጸም ለሚያስፈልጉት ሰነድ/ጽሑፍ ለማግኘት ለሚያስፈልጉት ሰነድ/ጽሑፍ ለማግኘት.
33	በገጽ/ገጽ "ገ"		ርዕድ ለማስፈጸም ለሚያስፈልጉት ሰነድ/ጽሑፍ ለማግኘት ለሚያስፈልጉት ሰነድ/ጽሑፍ ለማግኘት.