



**Environment and Climate Change Canada (ECCC) - Written Responses to Undertakings from the “Nunavik Marine Region Wildlife Board and the Eeyou Marine Region Wildlife Board Phase 2 – NMR/EMR ; Polar Bear Date of Hearing: February 4-7, 2025; Presiding Chairpersons: Iola Metuq, Chair NMRWB, Peter Hale, Vice Chair EMRWB”**

**Submitted to ECCC:** February 24th, 2025

**Version:** March 14<sup>th</sup>, 2025

**Due:** March 14th, 2025

**Undertakings for ECCC to address:** #3, #4, #5, #6 and #7

**3. Given by: Environment and Climate Change Canada/Canadian Wildlife Service (ECCC/CWS)**

**Undertaking:** in response to the question from B. Palliser of the Anguvigaaq

3)The [Federal] Environment Minister rejected and varied both Boards decisions in 2015 and set a TAT of 23, with 2:1 ratio, and other NQLs. What did the Government do to enforce that Minister’s 2015 decision?”

ECCC/CWS committed to answering the question in writing.

**Written Response by ECCC:**

3) Polar bear management in Canada is a shared responsibility among the federal, provincial and territorial governments, Wildlife Management Boards/Advisory Councils, and Land Claim Organizations that represent Indigenous rights holders. Wildlife Management Boards/Advisory Councils within polar bear range were established under Land Claims Agreements as institutions of public government to manage and regulate wildlife within their respective area/regions.

With a formal quota system, final decisions on harvest quotas are made by the relevant Wildlife Management Boards/Advisory Councils and provided to the responsible Minister who may accept, reject or vary the decision and provide reasons for rejecting or varying the decision. The Minister shall then proceed forthwith to do all things necessary to implement the final decision. The decision-



making process considers advice based on best available science (including periodic population inventories, harvest reporting, emerging threats and other relevant research, etc.) and Indigenous and Traditional Knowledge (including observations of problem bears, migration patterns, denning habits, etc.) provided by a multitude of stakeholders, partners, and interested parties, including governments, technical experts (scientists and Indigenous peoples) and non-government organizations.

Environment and Climate Change Canada recognizes the important roles of the Nunavik Marine Region Wildlife Board and the Eeyou Marine Region Wildlife Board as institutions of public government and their authority under the Nunavik Inuit Land Claims Agreement and Eeyou Marine Region Land Claims Agreement to manage and regulate wildlife. ECCC acknowledges the complexities related to polar bear management for the Southern Hudson Bay polar bear subpopulation given it is shared by multiple jurisdictions in an area experiencing rapid environmental change. ECCC notes the importance of cooperation and collaboration amongst all co-management partners for an effective polar bear management system that is underpinned by monitoring, Indigenous and Traditional Knowledge, complete harvest reporting and effective mechanisms to implement polar bear harvest decisions.

Since the final Minister's decision in 2016, the Government of Canada has continued to engage with co-management partners through a variety of fora on the matter of polar bear conservation and management in the EMR and NMR. Some examples include:

- Co-development of the 2023-2033 Quebec-Eeyou Marine Region- Nunavik Marine Region Polar Bear Management Plan.
- ECCC engagement through the Polar Bear Administrative Committee and the Polar Bear Technical Committee to monitor polar bear population status and trends and management objectives.
- ECCC engagement with Wildlife Management Boards and participation at Wildlife Management Board regular meetings on items pertaining to polar bear management.
- ECCC coordinating the Southern Hudson Bay Polar Bear Subpopulation Advisory Committee (supported by the Technical Working Group, and Consultation Working Group) to promote cooperation and coordinated decision-making by co-management partners with responsibility for polar bear management in the Southern Hudson Bay Polar Bear Subpopulation (SH);
- ECCC, Government of Nunavut and Quebec submitting a request for decision to NMRWB, EMRWB, NWMB and the Hunting, Fishing and Trapping Coordinating Committee (HTFCC) in August 2020 to re-assess the TAT in the SH subpopulation,



- ECCC helped coordinate decisions & supported the process to develop a draft SH Memorandum of Understanding between the NMRWB, EMRWB, and NWMB for coordinated decision-making (i.e., to hold a joint hearing), though the NWMB withdrew their support of the MoU in 2023.
- ECCC pursuing discussions with the Governments of Québec and Nunavut regarding coordinating efforts toward a harvest decision in SH, as well as identifying roles and responsibilities for implementing NMRWB and EMRWB polar bear harvest decisions.
- ECCC is committed to continuing work with co-management partners in the NMR and EMR toward an effective polar bear management system which includes complete harvest reporting, Inuit self-determination in harvest regulation and effective mechanisms to implement polar bear harvest decisions, within the framework of the QC-EMR-NMR polar bear management plan.

Interprovincial transport or exports of polar bear hides, mounts, rugs, or their parts and derivatives are routinely inspected to ensure they comply with Canada's existing acts and regulations, specifically the Wild Animal and Plant Protection and Regulation of International and Interprovincial Trade Act (WAPPRIITA). If ECCC enforcement officers detect non-compliance, appropriate action is be taken in accordance with the Compliance and Enforcement Policy for Wildlife Legislation ([www.canada.ca/en/environmentclimate-change/services/environmental-enforcement/publications/compliance-policy-wildlife-legislation.html](http://www.canada.ca/en/environmentclimate-change/services/environmental-enforcement/publications/compliance-policy-wildlife-legislation.html)).



#### 4. Given by: ECCC/CWS

**Undertaking:** in response to the following questions from the Board:

- 1) Is there data of pelts sold internationally - Over the last 20 years?
- 2) What are implications from moving away from the Total Allowable Harvest/Take approach, to a more local approach managing on just NQLs- what are the international implications for CITES and the risk of moving from Article 2 to Article 1?
- 3) Follow up, what is the implications for the Non-Detrimental Findings [of moving away from TAT/H and to a more local NQL approach]?
- 4) Regarding the 1973 Polar Bear Agreement- what did that agreement do for limiting trade? And please provide link to the Agreement for the Board to review

ECC committed to answering the questions in writing and providing the Board with a copy of the 1973 Agreement.

#### **Response:**

- 1) There are two reports prepared by E. Cooper Environmental Consulting that have reviewed and analyzed Canadian trade in Polar Bears which contain detailed information regarding the data of polar bear hides (i.e. “skins” and “bodies”) traded internationally from 2005 to 2021:

Cooper, E.W.T. (2015). [Review and Analysis of Canadian Trade in Polar Bears from 2005–2014](#). Environment Canada, Ottawa, Canada.

Cooper, E.W.T. (2022). [Review and Analysis of Canadian Trade in Polar Bears from 2012–2021](#). Environment and Climate Change Canada, Ottawa, Canada, 98 pp.

The number of export permits issued for polar bear is published since 2017 in the Wild Animal and Plant Protection and Regulation of International and Interprovincial Trade Act (WAPPRIITA) annual reports online at <https://www.canada.ca/en/environment-climate-change/services/convention-international-trade-endangered-species/publications.html>. The number of export permits presented in these annual reports include any types of Polar Bear specimens, for example skin, skull, claws, or baculum. Permits for scientific



samples are not included in this analysis, since they are not related to Polar Bear harvest.

Table 1 below provides a synthesis of the above information, as well as the most recent data for 2022–2024 on export permits and number of hides exported from Canada. The ECCC CITES E-Permitting System does not contain reliable data on export permits before 2014. As shown in Table 1, the proportion of Polar Bear hides exported from Canada relative to export permits issued varies from year to year within a range of 55 to 81%, while showing an overall linear trend.

*Table 1 Number of export permits issued for Polar Bear (2014-2024) and number of Polar Bear Hides Exported from Canada from 2005-2024.*

Calendar Year	Total Number of Export Permits issued for Polar Bear <sup>a</sup>	Number of Polar Bear Hides Exported from Canada <sup>b</sup>	Proportion (%) of Polar Bear Hides Exported from Canada relative to Export Permits Issued
2005	-	266	-
2006	-	294	-
2007	-	315	-
2008	-	278	-
2009	-	299	-
2010	-	316	-
2011	-	343	-
2012	-	365	-
2013	-	375	-
2014	237	176	74
2015	292	236	81
2016	232	180	78
2017	215	167	78
2018	206	161	78
2019	148	89	60
2020	109	75	69
2021	169	117	69
2022	100	55	55
2023	108	73	68
2024	78	56	72



<sup>a</sup> Any Polar Bear specimen, excluding exports for scientific purposes. Sources: 2014–2022: WAPPRIITA Annual Report, 2022; 2023–2024: Data extraction from ECCC CITES E-Permitting System.

<sup>b</sup> Excluding exports for scientific purposes. Sources: 2005–2011: E. Cooper report 2005-2014; 2012–2021: E. Cooper report 2012–2021; 2022: E. Cooper Pers. Comm. to ECCC from ECCC data, 2022; 2023–2024: Data extraction from ECCC CITES E-Permitting System.

2)

Any change in polar bear management that is seen to be loosening restrictions on harvest or possibly increasing harvest would likely be closely scrutinized internationally. A management decision that could possibly increase harvest levels could be perceived by some international stakeholders as rationale for stricter control under CITES and may therefore increase the risk of a successful proposal to transfer polar bear from Appendix II to Appendix I of CITES. There could also be a risk of other CITES compliance processes.

3)

The recently published Non-Detriment Finding Report would no longer accurately represent Canadian management, and a new Non-Detriment Finding would have to be prepared. The 2024 Non-Detriment Finding Report is available at: <https://www.canada.ca/en/environment-climate-change/services/convention-international-trade-endangered-species/non-detriment-findings/polar-bear.html>

4)

We have attached a copy to the *1973 Agreement on the Conservation of Polar Bears* to our submission. Additionally, the agreement can be downloaded at: <https://www.polarbearagreement.org/resources/agreement/the-1973-agreement-on-the-conservation-of-polar-bears>

Regarding the question of what the *1973 Agreement* did for limiting trade, we can provide the following observations:

- Article III of the *1973 Agreement* outlines conditions under which polar bears can be taken:
  - a) for bona fide scientific purposes; or
  - b) by that Party for conservation purposes; or



- c) to prevent serious disturbance of the management of other living resources, subject to forfeiture to that Party of the skins and other items of value resulting from such taking; or
  - d) by local people using traditional methods in the exercise of their traditional rights and in accordance with the laws of that Party; or
  - e) wherever polar bears have or might have been subject to taking by traditional means by its nationals.
- Article III also notes that the skins and other items of value resulting from taking under sub-paragraph (b) and (c) of paragraph 1 of this Article shall not be available for commercial purposes.
- At a high level, Article-III-2 limits the commercial trade of polar bears to those acquired through legal mechanisms.
- The Government of Canada has maintained a permanent record of all Polar Bear, hides, or any other products lawfully exported from or imported to Canada since 1975. However, as there is very limited trade data available prior to the 1973 Agreement coming into effect in 1976, it is difficult to assess the extent of how the *1973 Agreement* itself limited trade.
- The international trade of polar bears was restricted under Appendix II of the Convention on International Trade in Endangered Species of Wildlife Flora and Fauna (CITES) since the first CITES CoP in Bern, Switzerland in 1976(<https://cites.org/sites/default/files/eng/cop/01/E01-Appendices.pdf>.) Under CITES, any international shipment, trade, or sale of Polar Bear or parts thereof requires a non-detrimental finding and permit.



## 5. Given by: ECCC/CWS

**Undertaking:** in response to the question from the Board Staff in relation to studies and reports on the impacts of Polar Bears scavenging at dumps, E. Richardson referenced some studies and undertook to provide the Boards with such studies and reports. Research specifically out of Alaska.

Response:

Understanding the impacts of anthropogenic waste on polar bears has become an emerging issue as bears are attracted to settlements and dumps in response to longer periods of time spend on land. ECCC conducted some of the first research (Lunn and Stirling 1985) investigating the potential benefits/consequences of polar bear foraging on anthropogenic food sources in the Churchill dump. This study revealed that bears that fed in the dump were heavier than other bears but did not gain any survival or reproductive benefits as a result of the behaviour. However, this study did not address the direct effects of consumption of garbage on general bear health and is now 40 years old.

Clarkson and Stirling (1994) note that polar bears are known to consume a “wide range of indigestible and hazardous materials, such as plastic bags, styrofoam, car batteries, ethylene glycol, and hydraulic fluid.” many of which likely have unreported health impacts. However, more research is required to assess the extent to which these hazardous materials are consumed and what potential health outcomes of such behaviours may be. More recently, and as referenced in the Phase II hearings by ECCC staff, research from the North Slope of Alaska by Stimmelmayer et al. (2023), indicated acute gastritis in 7/12 bear stomachs that had consumed plastic waste. The authors of this report highlight the potential health implications of consuming plastic bags, and particularly the potential for digestive blockage in polar bears.

In addition to the potential health implications of foraging in dumps, a recent review by Smith et al. (2022) examines several case studies from across the circumpolar Arctic where uncontrolled access to anthropogenic food sources have resulted in the potential for increased human polar bear conflict. Collectively these studies suggest that reduced access to anthropogenic food resources can help reduce human polar bear conflict by reducing food conditioning. Restricting access to dumps will also limit the potential consumption of hazardous materials by bears, potentially avoiding negative health outcomes.

Articles referenced above have been attached separately:





Lunn, N.J. and I. Stirling. 1985. The significance of supplemental food to polar bears during the ice-free period of Hudson Bay. *Can. J. Zool.* **63**: 2291-2297.

Clarkson, Peter L. and Stirling, Ian, "POLAR BEARS" (1994). *The Handbook: Prevention and Control of Wildlife Damage*. 31.  
<https://digitalcommons.unl.edu/icwdmhandbook/31>

Smith, T. S. et al. Anthropogenic food: An emerging threat to polar bears. *Oryx*. 1–10 (2022).

Stimmelmayer, R., SimsKayotuk, C., Pederson, M., Sheffield, G., Frantz, R., Nayakik, J., and Adams, B. 2023. Anthropogenic waste ingestion of Southern Beaufort Sea polar bears, Alaska (2010–2020). *Ursus*, 2023(34e5):1–7



## 6. Given by: ECCC/CWS

**Undertaking:** in response to the following questions from Board staff:

- 1) What are the annual numbers of DLP kills in Southern Hudson Bay and Western Hudson Bay communities at dumpsites/or as a result of bears coming into the dumps.
- 2) Is there monitoring or studies on where and what is making bears problem bears?
- 3) Are there any policies or strategies for municipalities to adopt to manage waste better to address problem polar bears?

ECCC/CWS have Macro numbers on DLP kills undertook to try to get numbers on locations and further refined numbers. ECCC/CWS will inquire as to whether they can provide a more fulsome answer to question 2, and 3.

Response:

- 1)
  - The Canadian Polar Bear Technical Committee (PBTC) began tracking DLP kills in 2019-2020 as part of their annual population assessment work. The annual reporting period for Canada is July 1 to June 30. The data are reported by jurisdiction as “Number of polar bears included in Provincial and Territorial database under the category of defense of life and property kills.”
  - The Government of Canada uses the PBTC data to annually populate the Polar Bear Range States table titled “Polar bears injured or killed in conflict situations” online at: [Polar Bear Range States - Polar bears injured or killed in conflict situations; Humans injured or killed by polar bears](#)
  - Jurisdictional data are submitted to PBTC as an “annual total” by each Province/Territory or Region (Yukon (ISR); NWT (ISR); Nunavut, Manitoba, Ontario, Quebec-EMR-NMR and Newfoundland and Labrador).
  - DLP numbers submitted by the Government of Quebec for Quebec-EMR-NMR region are minimal values, since harvest reporting is incomplete and there is an absence of formal monitoring of polar bear conflicts in Qc.
  - The undertaking asks “What the annual numbers of DLP kills are in Southern Hudson Bay and Western Hudson Bay communities at dumpsites/or as a result of bears coming into the dumps?”
  - Details on DLPs specific to Southern Hudson Bay and Western Hudson Bay subpopulations are not directly available from the PBTC data. As such Environment and Climate Change Canada reached out to jurisdictions with shared management authority for Southern Hudson Bay and Western Hudson Bay to be able to provide relevant data. Data is provided in the table that follows.



*Table 2 - Number of polar bears included in Provincial/Territorial databases under the category of defense of life and property kills*

Province, Territory or Region	Source of Data	Date on which Input was provided to ECCC	Reporting Year (July 1 <sup>st</sup> to June 30 <sup>th</sup> )	Total DLPs reported	If available, number of DLPs reported		
					at a Dumpsite	from WH**	from for SH***
<b>Nunavut<sup>1</sup></b>	Department of the Environment	March 5 <sup>th</sup> , 2025	2019/2020	32	-	0	0
			2020/2021	42	-	2	0
			2021/2022	59	-	5	0
			2022/2023	40	-	5	0
			2023/2024	23	-	4	1
<b>Manitoba</b>	Department of Natural Resources and Indigenous Futures		2019/2020	1	0****	1	-
			2020/2021	0	-	-	-
			2021/2022	0	-	-	-
			2022/2023	0	-	-	-
			2023/2024	0	-	-	-
<b>Ontario<sup>2</sup></b>	Ontario Ministry of Natural Resources	March 6 <sup>th</sup> , 2025	2019/2020	5	Not tracked	NONE <sup>2</sup>	ALL <sup>2</sup>
			2020/2021	1			
			2021/2022	0			
			2022/2023	4			
			2023/2024	5			
<b>Quebec-EMR-NMR<sup>3</sup></b>	Ministère de l'Environnement, de la Lutte contre les changements climatiques, de la Faune et des Parcs	March 5 <sup>th</sup> , 2025	2019/2020	2	No DLP kill recorded directly associated with a dump site	-	-
			2020/2021	4		-	-
			2021/2022	7		-	-
			2022/2023	5		-	-
			2023/2024	4		-	-



<sup>1</sup> **Please note:** The Government of Nunavut information provided within this table is for the sole use & purpose of the Nunavik Marine Region Wildlife Management Board (NMRWB) and Eeyou Marine Region Wildlife Management board (EMRWB) public consultation process. The Government of Nunavut data on polar bears is not to be used for any other purposes or analysis without data sharing agreement with the Government of Nunavut.

<sup>2</sup> **Please note:** Ontario Ministry of Natural Resources does not receive complete reporting of the details around DLPKs & does not track specific instances around them (i.e. whether in a dump or not). By working definition all DLPKs would be SH bears as they are in SH when they are killed.

<sup>3</sup> **Please note:** Quebec-EMR-NMR region are minimal values, since harvest reporting is incomplete and there is an absence of formal monitoring of polar bear conflicts in Qc.

\*\* WH = Western Hudson Bay polar bear subpopulation

\*\*\* SH = Southern Hudson Bay polar bear subpopulation

\*\*\*\*\*The WHB DLP reported for 2019/2020 had interacted with a dumpsite twice (both times handled, housed at Polar Bear Holding Facility, and relocated). The DLP kill did not occur at the dumpsite in this case, but there is high likelihood that this bear was food conditioned, based on capture sites



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2)

There have been a limited number of studies investigating human polar bear interactions and factors that contribute to human polar bear conflict, DLP kills and human mortalities. The most comprehensive study of DLP kills was conducted by Dyck (2006) using data from 618 polar bear DLP kills in Nunavut. The primary results of that study were that young male bears  $\leq 6$  years of age were the most common type of bear killed in defense of life and property. Most DLP kills occurred in association with Indigenous camps where attractants (primarily country foods) were believed to have attracted bears.

The most comprehensive analysis of human polar bear attacks was published by Wilder et al. (2017) as an initiative of the Polar Bear Range States Conflict Working Group. The paper examined 73 polar bear attacks that resulted in 20 human fatalities and 63 human injuries. The authors note that "...nutritionally stressed adult male polar bears were the most likely to pose threats to human safety. Attacks by adult females were rare, and most were attributed to defense of cubs. We judged that bears acted as a predator in most attacks, and that nearly all attacks involved  $\leq 2$  people." Both Dyck (2006) and Wilder et al. (2017) note that attractants are a likely contributing factor to human bear conflict.

In addition to understanding local factors that influence human polar bear conflict, ECCC has also worked with the province of Manitoba to examine longer term trends in human polar bear conflict in western Hudson Bay. Towns et al. (2009) examined long-term trends (1970-2004) in human bear conflict near Churchill, Manitoba and similar to Dyck (2006) found that subadult male bears were the most common type of bears involved in conflict. They also noted an increasing trend in the number of problem bears that was related to a increasing ice free period which suggests a potential for increased human bear conflict in a warming Arctic. Articles referenced above have been attached separately:

Towns, L., Derocher, A. E., Stirling, I., Lunn, N. J. & Hedman, D. Spatial and temporal patterns of problem polar bears in Churchill, Manitoba. *Polar Biol.* 32, 1529–1537 (2009).

Wilder, J., Vongraven, D., Atwood, T., Hansen, B., Jessen, A., Kochnev, A., . . . Gibbons, M. (2017). Polar bear attacks on humans: Implications of a changing climate. *Wildlife Society Bulletin*, 41(3), 537-547.

Dyck, M.G. (2006) Characteristics of polar bears killed in defense of life and property in Nunavut, Canada, 1970-2000. *Ursus*, 17, 52-6

3)



Waste management is a municipal issue and varies by community. With regards to any policies or strategies for municipalities to adopt to manage waste better to mitigate the risks associated with interactions with polar bears, Canada, as a member of the Polar Bear Range States, participated on the Polar Bear Range States Conflict Working Group. The Conflict Working Group has published a range of materials to mitigate the negative impacts associated with human-bear interactions in a variety of scenarios. Materials related to managing human-bear interactions are posted on the Polar Bear Range States Website: <https://www.polarbearagreement.org/working-groups/human-polar-bear-conflict>. Of particular interest might be the links & materials associated with [Polar-Bear Deterrence](#) (Polar bear deterrence programs and training protocols available across the Range States).

From an ECCC science perspective, restricting access to dump facilities where polar bears may get food rewards or consume hazardous materials is the preferred waste management approach. ECCC has also reached out to provincial and territorial counterparts to understand availability of relevant policies and/or strategies. Their responses have been compiled below.

#### **Government of Nunavut –Department of Environment**

“The Department of Environment currently has no policies or strategies for municipalities to adopt to manage waste better that would mitigate polar bear conflict at waste management site. There are some guidance documents for some things but they are in the process of being repealed. As part of our Conservation Officer duties we conduct regular patrols and deter polar bears that come near their communities including when polar bears are near or at community dumps.”

#### **Government of Québec –Ministère de l’Environnement, de la Lutte contre les changements climatiques, de la Faune et des Parcs:**

“The presence of polar bears in communities’ dumpsites does not seem to be a major issue in Nunavik. We never heard of any complaints from the communities regarding Polar Bears being attracted by the communities’ dump sites (There are other animals using these sites, but no Polar Bears). Also, we are not aware of any policies or strategies for waste management sites that are directly addressed to mitigate human/polar bear conflicts. Nevertheless, the Regulation respecting the landfilling and incineration of residual materials (Q-2, r. 19 ) in Québec does impose some restrictions to be respected regarding the access of wildlife to landfills (fencing to prevent animals from entering), which in reality are not however always easily applicable in the context of northern communities, permafrost, and even more for preventing polar bears to enter a landfill. For the waste management



sites of Mining companies, there might be something in their Certificate of authorization, but not necessarily specific to polar bear.

Polar bears do not seem to be attracted to dump sites in Nunavik at the moment.”

### **Manitoba –Department of Natural Resources and Indigenous Futures**

“The Polar Bear Alert Program has been in place in Churchill since 1983. During the active polar bear season, the Polar Bear Alert phone line is monitored 24 hours-a-day, and the public can call to report polar bear sightings in Churchill’s vicinity. One of the objectives of the Polar Bear Alert program is to ensure that polar bears do not learn to depend on human based food sources in the Churchill area. A control zone around the immediate Churchill town site and dump was established in which polar bears are actively encouraged to move away by Polar Bear Alert staff. ”

### **Ontario –Ontario Ministry of Natural Resources and Forestry**

“ECCC was informed that while informal discussions have occurred with First Nations about waste management, to the best of their knowledge no formal guidance on waste management to reduce interactions with polar bears has been provided.”





## 7. Given by: ECCC/CWS

**Undertaking:** In response to the question from Makivvik

1) There is a sentiment that there is an onus now on Inuit to reduce harvesting to alleviate the risk of climate change on Polar Bear. But you mentioned tourism and industrial activities- and in the Management Plan, at section 3.5, there is an approach regarding industrial activities. So, my question is, is there anything from ECCC that is being done- there is the NMRIRB that review projects, but them alone can't tackle this huge issues with the increase of tourism activities in the region and other industrial activities. So, I am asking what is being done on your side to tackle these questions?

**Undertaking:** In response to the question from Makivvik:

ECCC/CWS undertook, in relation to the industries, to check in with their team to see if they have some specific policies, and/or what work is happening there.

### Response:

To help guide our response to this undertaking, we first would like to clarify that in the [ECCC Management presentation, slide 3](#) – there is a list of threats that is extracted from the Appendix I of the 2018 “Committee on the Status of Endangered Wildlife in Canada (COSEWIC) assessment and status report on the Polar Bear *Ursus maritimus* in Canada.” The 2018 Assessment and Status report contains a “Threats calculator exercise for Polar Bear.” This document is available online at <http://www.registrelep-sararegistry.gc.ca/default.asp?lang=en&n=24F7211B-1>. In terms of level of threat: tourism (i.e. Recreational activities (International Union for Conservation of Nature (IUCN) Threat 6.1) and other industrial development (i.e. Energy production & mining (IUCN Threat 3) were identified as negligible threats and hydro development projects (i.e. Natural system modification IUCN Threat 7) were identified as “Not a threat.”

We have also extracted the text being referred to as “Section 3.5” from the “*Polar Bear Management Plan for Québec, the Eeyou Marine Region and the Nunavik Marine Region 2023-2033*”:

*“Approach 3.5: Minimize the impacts of industrial development, shipping, tourism and other anthropogenic activities on polar bears within the management area.*

There is a growing interest to develop economic ventures in the region, many of which can negatively impact polar bears. It is important to understand the scope of these activities and the threats they pose, as well as to identify approaches to minimize them.



For instance, there is a need to identify sensitive polar bear habitats for which particular protections and stewardship measures may be necessary, or which may require special consideration during the evaluation of potential development projects. Establishment of industry guidelines and best practices will also help to thwart possible detrimental impacts from these emerging activities.

The impacts of hydro-electric development on polar bears, their prey and the sea ice are a concern to Inuit and Cree. Given the region's existing hydroelectric infrastructure and its strong potential for new projects, it is important to gain a better understanding of implications, particularly the impacts on polar bears, their prey and the sea ice."

Within this context, we acknowledge Makivvik's concerns regarding understanding how threats to polar bears linked with development activities are being addressed by the Government of Canada. Under Section 3.5 of the QC-EMR-NMR Plan there is a need expressed to identify sensitive polar bear habitats. We can share that as part of the Polar Bear Range States' 2015-2025 Circumpolar Action Plan, Canada (ECCC) co-led the work to advance CAP Objective 2: "Ensure the conservation of essential habitat for polar bears." In 2023, the Essential Habitat Working Group in close collaboration with IUCN Polar Bear Specialist Group (PBSG) delineated "commonly used polar bear habitats" defined as: habitats that are used by polar bears fairly consistently from year to year, focusing on contemporary distributions (post-2000) wherever possible. The associated maps were shared domestically in 2023. More information about how the maps were generated is available online on the Polar Bear Range States website at: <https://www.polarbearagreement.org/resources/circumpolar-action-plan/cap-2020-2023-implementation-plan/objective-3-plan/objective-3-reports/cap-objective-3-triennial-final-report-2020-2023>.