



September 25, 2017

Strategic Priorities
Canadian Wildlife Service
Environment and Climate Change Canada
15th Floor, Place Vincent Massey
351 St. Joseph Blvd.
Gatineau, QC
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RE: Action Plan for the Woodland Caribou, Boreal Population

Dear Canadian Wildlife Services,

The Wildlife Society's Manitoba Chapter is Manitoba's oldest scientific based wildlife management organization representing approximately 150 wildlife professionals including scientists, professors, managers, biologists, veterinarians, educators and planners. We are pleased to provide comments and concerns from the Manitoba Chapter on the recently released Federal Action Plan for the Woodland Caribou, Boreal Population (Environment and Climate Change Canada. 2017. Action Plan for the Woodland Caribou (*Rangifer tarandus caribou*), Boreal Population, in Canada – Federal Actions [Proposed]. *Species at Risk Act* Action Plan Series. Environment and Climate Change Canada, Ottawa. vii + 24 pp.).

It is encouraging to see Environment and Climate Change Canada release this action plan for boreal woodland caribou in Canada. Focusing on science as a primary pillar is important, as many unanswered questions currently exist regarding not only the exact causes of some of these dramatic population declines but also the best approaches to recovery efforts for the boreal caribou populations in various locations throughout Canada. Science, along with traditional knowledge and community engagement, is likely to provide the best opportunity to help find answers to these questions and solutions to these problems. Further to this we have attached a copy of The Wildlife Society's Position Statement on "Endangered and Threatened Species" as further support for scientific-based approaches to wildlife management.

Overall, there is a lack of detail regarding exactly what aspects will be studied, with minimal mention of the need to study the impact of disease on the recovery of these populations. Environment and Climate Canada should ensure that caribou health is considered an important parameter in all research, recovery, and range plans. Currently little is known about disease in free-ranging caribou populations; however the general health of these populations will definitely impact recovery efforts. Historic findings and current research activities indicate that ongoing changes in climate and habitat will likely put boreal caribou populations at risk of numerous diseases. Preliminary results from research currently being conducted in northern British Columbia, Alberta, and the Northwest Territories indicates that the health and fitness of boreal caribou may be negatively impacted by nutritional deficiencies, internal parasites such as *Neospora caninum*, and external parasites such as *Dermacentor albipictus* (winter tick) (Boreal Caribou Health Research Program - http://blog.healthywildlife.ca/monitoring-caribou-health-contributes-to-conservation/). Various other bacterial, viral, and parasitic infections as well as toxins and the prion disease, Chronic Wasting Disease, have potential significance to the health of boreal caribou populations in Canada.

Overall the conceptual pillars of recovery and protection as well as reporting on progress are important components of this action plan. Numerous times within the plan there is mention that the "vast majority of boreal caribou critical

habitat is located on non-federal land", and a reliance on provinces and territories to compile their own caribou range plans. As such the report does not address all measures as outlined in the Species at Risk Act (SARA) as provincial and territorial governments are yet to complete their portion of these reports. We understand that enacting this type of legislation is the responsibility of the provinces and territories and we recognize the high value in the inclusion of Indigenous communities and various stakeholders from within each jurisdiction. The 2012 Recovery Strategy provided a deadline of October 2017 for completion of these reports. We would like to encourage the federal government to provide improved guidelines for provincial and territorial commitments as well as incentives to meet judicious, timely deadlines. A national recovery strategy needs to be developed in which appropriate levels of funding (provincial, territorial, and federal) as well as personnel and resources are allocated to ensure successful implementation of recovery efforts for species at risk in Canada. On the ground action really matters and in many cases, provincial and territorial budgets have not expanded to cover these increasing demands.

Thank you for considering our comments and concerns regarding the federal action plan for boreal caribou in Canada. We hope our comments can help ensure successful implementation of this plan and recovery efforts.

Sincerely,

Brian Kiss, President

The Wildlife Society, Manitoba Chapter, Inc.

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