



Mr. Mark Chambers  
Great Lakes Areas of Concern  
Regional Director General's Office – Ontario  
Environment Canada

February 23, 2015

Dear Mr. Chambers;

The members of the St. Marys River Binational Public Advisory Council (BPAC) were presented with the preliminary results of the assessment of the *Bird or Animal Deformities or Reproduction Problems BUI* at our June 19<sup>th</sup>, 2013 meeting. Additional contaminants analysis was performed after this time, the results of which were included in the final report shared with the BPAC at our March 5<sup>th</sup>, 2014 meeting. The results of the assessment showed that there is: *little evidence of impairment in colonial waterbirds attributable to local contamination effects within the AOC.*

In November 2014, Environment Canada completed an addendum to its final report on bird deformities and reproductive health which provided the results of further assessment of embryonic deformities in herring gull and common tern eggs collected from within the AOC and from outside reference colonies in 2013 and 2014. It concluded that: *deformities cannot be linked to either geographical area, or to contaminant burdens.*

In December 2014, Environment Canada completed and shared a BUI Redesignation report with the BPAC for the Bird and Animal Deformities or Reproductive Problems BUI. The key findings reinforced were that:

- No physical deformities have been detected in herring gull or common tern chicks or adults.
- There is a low incidence of embryonic deformities that cannot be linked to contaminant burdens or to geographical area (i.e., there is no significant difference between AOC and non-AOC bird colonies).
- Contaminant levels are low overall, and not sufficiently elevated to have an adverse impact on reproductive success and development. This is the case for Polychlorinated biphenyls (PCBs) and other organochlorines, dioxins/furans, heavy metals like mercury, and Polybrominated diphenyl ethers (PBDEs).
- The reproductive success for herring gulls within the AOC is high, and that of the common tern is similar to the rest of the region.

The formal recommendation resulting from the assessment was for the removal of this BUI. The BPAC supports this recommendation and requests that EC and the MOECC proceed with the formal redesignation.

Sincerely,

Donald L. Marles, Canadian Chair  
Binational Public Advisory Council for the St. Marys River RAP