

# **NORTH SLAVE MÉTIS ALLIANCE**

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## **Re: True North Safaris Application for General Wildlife Permit to Bait Bears**

The North Slave Métis Alliance (NSMA) has reviewed the application, by True North Safaris for a General Wildlife Permit to hunt bears using bait, and has identified a number of potentially significant environmental impacts and a number of community concerns.

### **Environmental Impacts**

Baiting bears has potentially significant impacts on both the bear population and the local environment.

#### *Impacts on bear population demographics*

- ∞ Bear cubs may be orphaned, and bear productivity may be reduced because hunters are not always able to identify, and avoid killing, female bears.
- ∞ Reduced genetic diversity and the quality of the bear population from the removal of "trophy" bears.
- ∞ Habituation may lead to negative bear-human interactions, resulting in an increase of nuisance bear killings and a subsequent decrease in population size.

#### *Impacts on bear health*

- ∞ Bears may become addicted to unnaturally rich baits, and may act unusually aggressive, and/or suffer health effects from an unhealthy diet.
- ∞ Increased bear density in areas with bait may increase disease transmission.
- ∞ Increased bear density in bait areas may also lead to more fighting between bears, resulting in a higher number injured bears, particularly bear cubs.

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#### *Impacts on bear feeding behavior*

- ∞ The availability of highly attractive food sources in one area may discourage bears from ranging to other areas. Such a disruption of normal movement patterns and spatial distribution might cause habitat degradation for bears and for other species that occupy the same territory as bears.

#### *Impacts on the local environment*

- ∞ Hunters tend to be boisterous and may disturb species other than bears and affect their use of habitat. Disturbances of wildlife and birds while young are being raised may lead to population reduction and species diversity changes.
- ∞ Changes in wildlife behavior and habitat use, including unnatural concentration in an area which could lead to wildlife injuries and illnesses, and/or habitat degradation, including the introduction of invasive species.

### **Community Concern**

Baiting bears will not only negatively affect the local bear population and its surrounding environment it will also affect the North Slave Metis who use the land for traditional practices. The following concerns have been raised about bear baiting on our traditional lands.

#### *Insufficient data on bear demographics*

- ∞ All wildlife management decisions should be based on comprehensive and up-to-date wildlife data and information.

#### *Safety*

- ∞ There will be a community perception that it is too dangerous to fish or pick berries in areas where baited and potentially wounded bears may be and where there is the potential to be accidentally shot. The large area which needs to be avoided includes many NSMA camping, fishing, and harvesting sites.
- ∞ People may be afraid to eat bear meat due to concern about what the bear has been eating.

#### *Reduced landscape value*

- ∞ Reduced value of landscapes, objects or sites in the area that have heritage, cultural or historic importance to the Métis.
- ∞ Negative publicity for the region, and the NWT, related to the controversial practice may negatively impact on non-consumptive tourism businesses, and can even lead to diminished support for the recognition of Aboriginal Rights by animal rights groups who might normally be supportive.

#### *Unfair chase and other ethical concerns*

- ∞ Many members are against ALL sport hunting. They believe that killing is not a sport – you only do it out of necessity to feed your family.
- ∞ The community needs to come to consensus on the issue of whether baiting bears, especially in the spring when they are hungry and vulnerable, is acceptable or not over other hunting methods such as using dogs.

- ∞ Community spiritual/cultural beliefs and practices related to the relationship between humans and bears – lack of mutual respect can lead to future problems.
- ∞ Members may be concerned about the contradictory messages being provided by government to Métis youth. If a fed bear is a dead bear, then how will the number of “fed bears” be limited to only those few bears that will be harvested?

#### *Infringement on aboriginal rights to bear hunting*

- ∞ Non-aboriginal harvest of bears in competition with aboriginal harvest is contrary to Treaty 11 Rights. This outfitter does not have an Impact Benefit Agreement with the NSMA, and we object strongly to them harvesting our resources without one, especially for non-resident hunters' use. The first right to harvest wildlife through hunting and trapping activities belong to Dene and Metis people who are indigenous to the Northwest Territories. Elders will want the right to bear gall bladders and the distribution of meat, claws, teeth, galls, hide, and other by-products of sport hunting.
- ∞ Land and resource use conflict if one aboriginal group, or First Nation, is provided with preferential access to benefits such as employment, training, business, and procurement, from resource exploitation in comparison to another equally entitled First Nation or aboriginal community.
- ∞ Members are very likely to have significant property rights issues, since ownership of the wildlife, and the wildlife habitat, is not established.
- ∞ Members may be upset with the competition of commercial hunters for the best hunting locations.

#### *Management roles and responsibilities*

- ∞ How will the NSMA be involved in monitoring and enforcement, future review of the success, failure of permit conditions in achieving conservation and human safety goals? This becomes complicated considering the activities will be located in an overlap area between the Tlicho Settlement area, the Akaitcho Interim Measures Agreement area, and the Traditional Territory of the North Slave Métis. As happens so often, there is a high probability that Tlicho Dene and Akaitcho Dene will be preferentially involved, at the expense of Métis involvement.
- ∞ Members may not agree with permitting a second year of baiting after the infractions that occurred last year.

#### *Lack of consultation*

- ∞ The lack of Crown Consultation means that ENR and True North Safaris cannot know where NSMA camps, trails, or areas of current or planned activity are or will be during this spring hunting season.
- ∞ Communities should be directly involved in major decision-making in relation to wildlife management issues in their traditional area. This is a Bear Management Policy decision that should be the result of an adequate community Consultation process, not permitted on an ad-hoc basis.

Due to the number and complexity of these issues, and the likelihood that other long-term NWT residents may also have concerns, the NSMA recommends that an environmental assessment be done prior to issuing any such permit.

The North Slave Métis Alliance submits these comments as the elected political representative of the indigenous North Slave Métis People. The jurisdiction of the North Slave Métis Alliance applies to Métis Rights, including Aboriginal Rights and Titles and Treaty Rights throughout the area which lies between Great Bear Lake and Great Slave Lake, from the Mackenzie River to Contwoyto Lake. The North Slave Métis have shared their homeland with bears for many generations, and have practiced bear management since long before Europeans established effective control over bear management in our territory. The Constitution of Canada guarantees our right to continue doing so.

Sincerely,



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