



**ʔehdzo Got'ıne Gots'ę Nákedı**

PO Box 134, Tulita, NT, X0E 0K0

Phone (867) 588-4040

Fax (867) 588-3324

[chair@srrb.nt.ca](mailto:chair@srrb.nt.ca)

[www.srrb.nt.ca](http://www.srrb.nt.ca)

<http://www.facebook.com/SahtúWildlife>

Brett Elkin, Director  
Wildlife Division  
NWT Environment and Natural Resources  
[Brett\\_Elkin@gov.nt.ca](mailto:Brett_Elkin@gov.nt.ca)

***Delivered via email***

July 31, 2019

***RE: Bluenose West ʔedə (Caribou) Sustainable Harvest and Community Conservation  
Planning in the Sahtú Region***

Dear Brett:

The ʔehdzo Got'ıne Gots'ę Nákedı (Sahtú Renewable Resources Board - SRRB) is writing to provide clarification to the Ministry of Environment and Natural Resources (ENR) regarding the sustainable harvest for Bluenose West (BNW) ʔedə (caribou) in the Sahtú Region.

The SRRB appreciates the recent opportunity for discussions with ENR and Behdzi Ahda First Nation (BAFN) about the interim measures required for BNW ʔedə harvest regulation.

As you are aware, the 2016 Sahtú regional hearing on Bluenose East (BNE) ʔekwé (caribou) conservation resulted in the SRRB accepting the community conservation planning approach as the best option for achieving conservation outcomes for BNE ʔekwé in the region. This finding, based on the evidence, was reflected in the SRRB's *ʔekwé hé Dene Ts'ııı: Sustaining Relationships* Final Report on the Bluenose East Hearings, the findings of which were accepted by the Minister in February 2017. The 2016 hearing and subsequent engagement has involved all five Sahtú communities and resulted in region-wide discussions about the community conservation planning approach for ʔekwé/ʔedə in the region.

We understand that ENR would like further clarification in writing from the SRRB about the implications of the community conservation planning approach for the existing total allowable harvest (TAH) imposed as a result of the 2007 SRRB Report on the Bluenose West herd.

You will recall that the SRRB wrote to ENR on February 7, 2019 when the SRRB discovered that ENR was distributing harvesting tags to BAFN and Fort Good Hope for the BNW ʔekwé harvest. In that letter, the SRRB indicated:

The SRRB is extremely concerned about these recent developments which undermine the community conservation planning process underway in the Sahtú region since 2016 as a result of the Bluenose East hearings in 2016. These recent ENR announcements are inconsistent with the SRRB's evidence-based findings and decisions in the 2016 BNE Report, which was accepted by the Minister and is currently the basis for caribou management in the Sahtú region.

On May 17, 2019, the SRRB provided a letter supporting the recommendations put forward at the November 2018 status meeting of the Advisory Committee for Cooperation on Wildlife Management (ACCWM) regarding the Bluenose West ʔedə. The SRRB advised the Minister that the SRRB:

- is working to support BAFN in the process of finalizing the *Dehlá Got'ıne Caribou Management Plan and Tseduweh ʔade Ah'ah*;
- is planning a region-wide Hearing (in the form of a Public Listening session in each Sahtú community) to review the latest evidence regarding caribou harvest regulation in the region;
- supports the principle of fairness of harvest across regions and the use of best existing estimates of population estimates; and
- supports, therefore, the 2018 herd estimate and the sustainable overall harvest of 4%.

In recent meetings, ENR representatives have inquired about whether this May correspondence means that the SRRB accepts the use of TAH and tags to manage BNW harvest. The SRRB welcomes the opportunity to clarify that the SRRB does not accept the use of the TAH and related tag system, since this is contradictory to the current evidence that community conservation plans provide the best conservation outcomes. The TAH contradicts the past three years of efforts by the SRRB to support Sahtú communities (including BAFN) to develop their community conservation plans.

The SRRB is in the process of finalizing plans for a region-wide Hearing, in the form of Public Listening sessions, over the next 2 ½ years. These Public Listening sessions will take place in each Sahtú community, and each Public Listening session will focus on one of the five key issues of concern in the Sahtú region. This Hearing process will allow the SRRB to assess the evidence and provide a report on the efficacy of the community conservation planning approach on a regional basis, and next steps required for best conservation outcomes in the region. One of the Public Listening sessions will occur in Colville Lake and will address BNW ʔedə harvesting issues specifically and the SRRB anticipates that the Interim and Final Public Listening Reports will include recommendations specific to BNW ʔedə.

The SRRB looks forward to working with ENR and BAFN on an Interim Measures plan, as discussed in our recent meetings, to more clearly address the current requirements for BNW Ɂedə conservation for the interim period (until the SRRB has concluded its upcoming Hearing and addresses BNW conservation issues specifically).

We suggest that the interim approach should reflect the regulatory approach recommended in the SRRB's final decisions in 2016 for the BNE Ɂekwé. We note the following SRRB's decision made in 2016 and accepted by the Minister in 2017:

**Decision 32:** The SRRB recommends that the *Big Game Hunting Regulations* be amended to simply provide for Ɂehdzo Got'Iné (Renewable Resources Council) authorizations for any harvest rather than the current requirement for tags or for a “bull only” harvest.<sup>1</sup>

The SRRB is not recommending an immediate amendment to the *Big Game Hunting Regulations* for BNW Ɂedə (although it does remind ENR and GNWT Justice of the outstanding requirement for amending the regulations with respect to BNE to reflect the 2016 SRRB decisions accepted by the Minister in 2017). The SRRB is recommending that an Interim Measures Policy or approach be put in place, to recognize the role of the Colville Lake Ɂehdzo Got'Iné (Renewable Resources Council) in authorizing BNW harvest (rather than the current requirement for tags).

The Interim Measures Policy or approach should also be clear that no tags will be used for BNW for the period of time that the SRRB is in the process of a Hearing that specifically addresses BNW harvest, in order to respect the community conservation planning processes underway in the Sahtú communities.

The SRRB looks forward to working with ENR to support BAFN's community Ɂekwé/Ɂedə conservation planning process.

Máhsı cho,



Michael Neyelle, Chair

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<sup>1</sup> The SRRB notes that this is one of a number of decisions made by the SRRB in 2016 and accepted by the Minister in 2017 but still not acted upon by ENR and the GNWT Department of Justice. Other related decisions involve legal amendments to the *Big Game Hunting Regulations* and the application of provisions in the *Wildlife Act* which “Alternative Measures” for enforcement which recognize the restorative justice model developed in Délıne's *Belare wile Gots'é Ɂekwé* plan).