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Memphis, Tennessee

October 7, 2022

The Honorable Greg Nesbitt
Manitoba Minister
Natural Resources and Northern Development
450 Broadway
Winnipeg, Manitoba
Canada R3C 0V8

RE: Waterfowl Hunting Modernization in Manitoba

Dear Minister Nesbitt:

On behalf of the more than one million members and supporters of Ducks Unlimited, Inc., we want to thank you for the opportunity to provide comments regarding the proposed rules for non-resident waterfowl hunting in Manitoba. Every year, thousands of waterfowl hunters from across the United States travel to Manitoba to experience waterfowl hunting and invest significantly in your rural economies. While carrying out their passions, duck hunters also help form and reinforce the historic and enduring partnership between Canada and the United States where our combined efforts help manage one of the planets' most diverse and dynamic migratory bird landscapes. There are, however, growing concerns that the proposed new regulations will jeopardize this critical relationship, and we share these concerns.

Since the signing of the North American Waterfowl Management Plan (NAWMP) in 1986, the governments of Canada, the United States and Mexico recognized the need to manage migratory birds cooperatively, investing billions of dollars in on-the-ground conservation in all three countries. According to the Association of Fish and Wildlife Agencies' 2021 Fall Flights Report;

- "Since 1986, over \$2.7 billion (Canadian) has been invested in wetland conservation in Canada under the auspices of the North American Waterfowl Management Plan." This averages approximately \$77 million in funding to Canada each year.
- "This investment has resulted in over 27 million acres of wetlands and associated uplands habitat being conserved in Canada."
- "Annual investments by state agencies through the Fall Flights program over the period 2017 to 2020 averaged approximately \$3.7 million or \$4.5 million (Canadian) and had a significant influence on investments in waterfowl habitat by Canadian federal and provincial governments... cumulative investment by state agencies of \$85.5 million since 1991."
- Thanks to the generosity and support of US waterfowl hunters, 45 US States currently participate in the Fall Flights Program, which is funded almost exclusively by State Duck Stamp fees.

Furthermore, in support of NAWMP, for the latest fiscal year ending June 2022, DU sent \$22.3 million in philanthropic support for Canadian habitat conservation. This funding provides the necessary in-kind match for U.S. federal grants from NAWCA as well as unlocks grants sourced from Canadian governments.

And at the heart of this international, tri-partite partnership is the waterfowl hunter. President Franklin D. Roosevelt signed the Migratory Bird Hunting Stamp Act in 1934, at the urging of waterfowl hunters. Shortly thereafter in 1937, DU was founded by a group of waterfowl hunters. These efforts were initiated during the “dust bowl” days when waterfowl populations plummeted at the same time the U.S. was mired in the Great Depression. Despite bread lines and economic catastrophe, duck hunters were so passionate about the resource, they were emboldened to advocate for a “duck stamp” fee to make certain migratory birds, and waterfowl populations especially, were going to be valued and managed for the long term. To leverage these new funds for on-the-ground conservation projects, DU began raising money and sending it to Canada.

In 1984, DU began delivering conservation projects in parts of the United States to fulfill the life cycle needs of migratory waterfowl. Simultaneously, investments in Canada continued and increased with grant programs like the North American Wetlands Conservation Act (NAWCA) and substantial annual contributions from state fish and wildlife agencies across the U.S. These programs combined have invested several billion dollars in wetlands and waterfowl conservation throughout Canada with focus on priority waterfowl breeding areas including those in Manitoba. The foundation for establishing this successful cooperation, partnership and investment model is the duck hunter. It is this passion for waterfowling that drives individuals, states, and the U.S. federal government to invest in continental conservation projects in Canada and the U.S. We fear changes to Manitoba’s resident waterfowl hunting regulations that make Manitoba much less accessible to U.S. hunters will severely undercut this passion and jeopardize this longstanding and highly successful model for funding conservation in Manitoba and across Canada.

Our concerns are highlighted by the lack of evidence to support how these changes would increase the number of resident hunters in Manitoba. We fully respect and support the goal of increasing resident waterfowl hunters in Manitoba, but these proposed changes are not likely to achieve this goal. The proposal appears to be predicated on historical data showing a long-term decline in resident hunters in the province, which is accompanied by a decline in U.S. hunters as well. These data do not support the notion that further reducing U.S. hunters would stimulate an increase in resident hunters. This would create a “lose-lose” situation we believe everyone would hope to avoid. We would welcome the opportunity to collaborate with other stakeholders to develop and support policies to effectively expand and enhance access for waterfowl hunting in Manitoba while addressing specific concerns about access for resident hunters.

North American waterfowl hunters, and particularly US waterfowler hunters, are the lifeblood of NAWMP. They provide the political support that enables government investments in critical waterfowl habitat, at both the state and federal level. Additionally, duck hunters support user fee-based funding at the state and federal levels that providing millions of dollars in funding for investments in Canada, and billions across North America annually. We firmly believe that an action such as this risks undermining that strong foundation of support that is necessary to accomplish our conservation goals together.



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For these reasons, we urge you to reconsider these proposed regulations that restrict non-resident waterfowl hunting. If adopted, these changes would create a huge disincentive for U.S. waterfowlers to travel to Manitoba every year to enjoy the natural resources, support rural economies, and contribute to conservation in Manitoba.

Sincerely,

A handwritten signature in cursive script, appearing to read "Adam Putnam".

Adam Putnam
Chief Executive Officer