



September 11, 2018

113 Concerned Hunters
Yukon Fish and Game Association
Yukon Backcountry Hunters and Anglers
Wild Sheep Foundation

Re: 113 Concerned Hunters

I recently received a letter, representing 113 licensed resident hunters that raised a number of questions and conveyed concerns regarding the 2018 Permit Hunt Authorization (PHA) and the Department of Environment's response to Ross River Dena Council's (RRDC) notice in the Yukon News in June 2018.

As I expect that your members may share some of these concerns, I am directing my response to your organizations, and encourage you to share it with your members. I have also attached the letter for your reference.

a. What is the reason this [Finlayson caribou] permit cancellation was not brought before the board, by Environment Yukon, in a timely manner over the last 11 years?

The Yukon Fish and Wildlife Management Board (YFWMB) provides recommendations on changes to hunting and fishing regulations through a biannual process. Recommendations to change the *Wildlife Act* are on a 'as needed' basis and occur much less frequently. These recommendations are based on public submissions, collaboration with the Department of Environment, and consultation with local Renewable Resource Councils.

In 1998, the YFWMB recommended that the Finlayson caribou herd be placed on a PHA because of conservation concerns raised by the Department of Environment. Based on this recommendation, the *Wildlife Act* and *Regulations* were changed. The YFWMB, in collaboration with Department of Environment population surveys and total hunting pressure estimations, determined that the Finlayson herd could sustain a licensed hunting pressure of 30 permits a year.

As your membership is aware, the Finlayson caribou herd exists primarily on the traditional territory of the RRDC. As an unsigned First Nation, RRDC does not currently have access to the same mechanisms available to signed First Nations when it comes to voicing concerns regarding the management of wildlife in their traditional territory. As a result, we do not have First Nation harvest information and this contributes to our overall uncertainty regarding herd status.

The YFWMB recommended that I issue 30 Finlayson caribou permits for the 2018 hunting season. Due to the lack of capacity to voice their input, RRDC was not consulted on this decision. However, when I met with RRDC in July 2018, they made me aware of their extreme concern regarding the health of the Finlayson herd. That feedback, along with the 2017 population data collected by the Department of Environment, pointed to the need for immediate action to be taken.

In recognition of the information provided by Department officials and the RRDC, I made the difficult decision to use the authority entrusted to me under the *Wildlife Act Regulations* to set the Finlayson permit hunt for the 2018-2019 hunting season to zero. Furthermore, the Outfitter quota has been set to zero for the 2019-2020 season.

The decision to limit the 2018-2019 Finlayson permit hunt to zero is a temporary, interim measure we are taking to allow for better data collection and collaboration with the RRDC. Any further changes will go through the YFWMB, who I have informed throughout this process. In addition, the YFWMB and I have had several positive conversations around ensuring the YFWMB can fulfil its mandate within the RRDC's traditional territory, regardless of their status as an unsigned First Nation.

b. In YG's negotiations, what plans has RRDC proposed to mitigate the conservation concern for the Finlayson caribou herd?

The RRDC has clearly expressed their concern over the health of the Finlayson herd to us. This is a concern that has come from their membership and is one they are communicating to their citizens and the community of Ross River through a document entitled *Hunting Laws Summary*. This document states that they will reduce their harvest of Finlayson herd and voluntarily end the subsistence caribou hunting season on September 15. To improve the accuracy of harvest data, RRDC is requiring their citizens to report all harvests to the Ross River Dena Land Stewardship Department. Furthermore, RRDC has committed to a joint check station to improve harvest reporting from both subsistence and licensed hunters.

c. Does Environment Yukon consider encouraging registered trapping concession holders, such as RRDC, to trap wolves as a viable option to kick-start the Finlayson Caribou Herd's recovery?

For many years we have provided trapper training and snaring workshops for trappers interested in increasing their wolf harvest. Most recently we held a wolf trapping workshop in Ross River in December 2017.

d. Given the findings of the 2012 [moose] study, is there any other evidence-based reason that the government would support restrictions on moose harvest in the North Canol area?

We are not currently looking at restricting the moose harvest in the North Canol area. We are currently working with RRDC to collect more comprehensive subsistence and licensed harvest data through the joint check station on the North Canol Road. An increase in the accuracy of total harvest data could provide an evidence-based reason to restrict the moose hunt.

e. Is it the position of the government that limiting harvest should occur in the absence of data, without due process or population assessment?

The best wildlife management occurs when scientific, traditional and local knowledge works together to inform decision making. However, often all three lines of evidence are not available. In those cases, we make the best decisions we can, being mindful of the need to steward our wildlife resources. Environment stands by the use of its species management guidelines to address harvest management of sheep, moose and caribou. These are guidelines because we recognize that local and traditional knowledge also have a role to play in management approaches and decisions.

f. Does the government intend to engage Yukon resident hunters on their observations in this area as well?

Yes. We value feedback from hunters who are on the land in Yukon as they are a key source for local knowledge. Currently, we have biologists in five Yukon regions who regularly engage with Renewable Resources Councils, hunters, trappers, and others so that we learn about what people see on the land. It is also why we work with stakeholder organizations, like Yukon Backcountry Hunters and Anglers, Wild Sheep Foundation, and the Yukon Fish and Game Association. We also undertake hunter effort surveys every year to solicit information from licensed hunters. The next hunter effort survey is scheduled for January 2019.

g. Is it the position of the government that the decision of the Supreme Court of Yukon does not apply or have merit in this case?

We have a duty to consult with RRDC on hunting within their traditional territory as directed by the Supreme Court of Yukon. Consultation requires ongoing dialogue. When new concerns are identified, we must take the time to listen to the views of the First Nation and look for positive and honourable solutions.

h. Does the government intend to update the outfitter quota guideline to conform with current harvest management planning?

Currently, the *Guidelines to Establish Outfitter Quotas* remains our guiding policy document with respect to Outfitter quotas. However, we make consistent efforts to have a continued dialogue with outfitters regarding their concessions and quotas.

i. Would the government please clarify under which regulations this harvest will be managed, exactly what expectations it has for Yukon resident hunters, and how potential conflicts will be addressed for the 2018-19 hunting season, and beyond?

Our expectations for Yukon hunters have not changed this year. The general laws of application are in effect this season, meaning the Government of Yukon laws and regulations have not changed. Details about these laws, including season dates, game management zones areas, and hunter responsibilities are found in the annual Hunting Regulations Summary booklet, available online or at your nearest Environment office.

Whether or not hunters choose to comply with the RRDC's requests is their decision.

In an effort to mitigate potential conflicts, should they arise, we have developed a joint check station on the North Canol road with RRDC. We have also increased the Conservation Officer presence in Ross River area and are keeping the RCMP apprised of the situation.

j. If YG plans to encourage Yukon First Nations to allocate allowable harvest and issue permits to resident hunters, how will you set First Nations up for success in taking roles traditionally held by branches of the Department of Environment such as Fish and Wildlife, and Conservation Officer Services? Furthermore, how will YG put a legal framework in place under which this is possible?

Yukon Government is not encouraging Yukon First Nations to issue hunting permits or otherwise create hunting regulations outside what is outlined in their rights under the *Umbrella Final Agreement*. First Nations have authority to manage their citizens, and Yukon government remains the authority for licensed harvest. We will continue to work with Yukon First Nations in regards to local wildlife management through mechanisms, such as Renewable Resource Councils, that have been established through the *Umbrella Final Agreement*. However, as the RRDC is an unsigned First Nation, they do not have access to the same mechanisms when it comes to the management of wildlife in their Traditional Territory. We, therefore, need to work collaboratively with RRDC do develop similar approaches utilized by First Nations who have signed the *Umbrella Final Agreement* to co-managed wildlife in the Ross River area.

k. **We ask that the government undertake a complete socio-economic assessment of Yukon resident hunting and angling to gain a full appreciation for the value these privileges hold territory-wide.**

As a fellow hunter, I appreciate the important place harvesting wild game for our families has in the lives of Yukoners. I have instructed staff at the Department of Environment to work with their colleagues in Economic Development to look into the details of a socio-economic assessment of Yukon licensed hunting and angling.

This government is committed to supporting Yukoners live vibrant, healthy lives. For many of us, this includes hunting. Whether you are a hunter, outfitter, or First Nations citizen, we all have the same goal; to ensure healthy animal populations in the Yukon, and the opportunity to put food on the tables of our families for generations to come.

I would like to thank you for your letter of concern once again and hope my response provided the clarity your organization was seeking.

Please do not hesitate to come forward with other concerns. My door is always open.

Mahsi,



Pauline Frost
Minister of Environment