



**Teslin Renewable Resource Council**  
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May 16, 2011

Review Committee Members  
For the Yukon Wolf Management Plan  
PO Box 31280  
Whitehorse, Yukon  
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Dear Review Committee Members:

**RE: Teslin RRC Comments on the Wolf Management Plan Review**

The Teslin Renewable Resource Council has devoted a lot of time, energy and money to the review of wolf management within the Yukon and within our Traditional Territory. Our Council hosted two workshops for our community and area residents to ensure we heard from everyone who had something to say. Our Council also invited all affected user groups within our Traditional Territory, some of which attended both our workshops. TRRC members also attended community meetings within the southern Yukon to hear what other Councils and communities were saying. With everything we have heard and with what we have learned in our capacity as a Renewable Resource Council, we respectfully wish to submit the following comments and/or suggestions to the Review Committee.

Firstly, the Teslin RRC was informed in writing (Nov. 23/10) by the Chair of the Yukon Fish and Wildlife Management Board that all four of our regulation change proposals dealing specifically with wolf management would be addressed during the Wolf Conservation Management Plan review. Our Council would like to ensure that these proposals are embedded in the plan.

**In the development and drafting of the new Wolf Conservation and Management Plan, we would like to recommend the following:**

1. The new Plan needs to be simple, written in plain language, be community based and be non-restrictive.
  - Incorporate traditional and local knowledge into the plan.
  - All decision making should be a balanced approach of local and traditional knowledge with YG scientific knowledge used as technical support.

- Local and Traditional Knowledge shall prevail, in the absence of current scientific data.
  - Develop structures in the new plan to require the use of local and traditional knowledge. YG has not been listening to people out on the land. It has been stated that YG appear to turn a deaf ear when Yukoners talk about wolves and that they do not want to do anything about wolf management.
  - RRCs need to know who the decision makers will be, and believe that one party to the Plan should not have veto power. It should be clear in the Plan who is paying and who is going to implement it?
2. Plan objectives should be achievable and affordable.
- The Plan to cover the different regions within the Yukon with an annual budget.
  - Incentives for the hunting and trapping of wolves must be developed.
  - Adequate funding must be made available to assist in developing hunting and trapping of wolves on an annual basis for long term objectives.
  - Mandate annual long term funding commitments to devolve implementation of the Wolf Management Plan objectives to the communities.
3. A long term Plan monitoring and review.
- Legal means of traditional management methods should be used as the main management tools (i.e. hunting, trapping, denning, etc.).
  - The enhancement of traditional hunting and trapping of wolves.
  - With regards to wolf harvests, the regulations must be streamlined. There are too many rules, regulations and reporting deadlines.
  - One reporting deadline should be established for the harvest of wolves, hunted or trapped.
  - No sealing requirements and unnecessary regulations and documentation.
  - Export regulations (as per CITES) need to be reviewed and changed. A mandate should be given to YG to undertake a review of all territorial and international export regulations to ship/export wolf and predator pelts out of the Yukon Territory.
  - On the International level, more emphasis must be put on the traditional and cultural aspect of hunting, trapping and fishing in the Yukon. When sending government representatives to international events the YG should also be sending First Nation representatives along with them.
  - The development of a course specifically for trapping wolves and a licence/permit just for the purpose of trapping wolves.
  - The baiting of wolves for the purpose of hunting should remain in regulation.
  - Raise the bag limit of wolves for non-residents.
  - Increase season dates for trapping and hunting of wolves to April 15.
  - While it is legal for trappers to use road-kill as bait if the meat is not edible, we want the reporting requirement, which is required in advance of use, to the Conservation Officer to be removed from current regulations to avoid excess work for trappers.
  - All wolves harvested by a trapper on the trapline to be considered as trapped.
  - For 3 days on either side of the full moon and on the day of the full moon, from November 1 to April 15, permit hunting of wolves after dark.

- As long as wolf harvests are not exceeding 30% of the Yukon population levels, there should be no bag limits and unlimited harvests should be allowed, with regard being given to the hides.
- Increase the use of traplines which would include the utilization of under-utilized or unused traplines to assist in wolf management.
- Conduct a joint and comprehensive review of under-utilized traplines within the Yukon.

#### 4. Intensive Management

- The majority of the 1992 Yukon Wolf Conservation and Management Plan should be declared obsolete.
- In intensive wolf reduction management zones allow the use aircraft for spotting to hunt and trap on the ground. This could be used prior to YG conducting an aerial kill of wolves. Then we could still try hunting and trapping as a primary measure.
- Encourage YG to do annual, cost-effective, flights to monitor calf recruitment in high use corridors.
- In the event that it is determined that drastic measures need to be taken to manage the wolf populations in intensive wolf reduction management zones, the plan should indicate how this will be implemented and that it should **be used only as a last resort**.
- When extreme management measures need to be taken, the affected First Nation and Renewable Resource Council and all parties to the Wolf Management Plan must be included in the decision making process.
- It is our opinion that sterilization programs are ineffective, too costly to effectively monitor and study and above all they need to be done in conjunction with respect to hunting and trapping rights. Instead, these dollars would be put to better use on incentives for trappers and hunters.

The Teslin RRC has been instrumental in getting the 1992 Plan to be reviewed and we have spent an enormous amount of time and resources in our quest to have proper wolf management in the Territory. Therefore, the Teslin Renewable Resource Council requests that when the DRAFT plan has been developed the Yukon Renewable Resource Councils be able to view and comment on the document before it's public consultation process.

Thank you for your consideration of our comments and recommendations. Our Council looks forward to reviewing the draft of the new Yukon Wolf Management Plan.

Sincerely,

Sandy Smarch  
Chair