

Yukon Conservation Society Response to the Recommended Yukon Wolf Conservation and Management Plan August 2011

The Yukon Conservation Society (YCS) requests that the deadline for comments on the Recommended Yukon Wolf Conservation and Management Plan August 2011 be extended beyond August 31, 2011. YCS received notification on August 2 that comments were being received – however we doubt that most members of the public were aware of the summer public comment period. Considering the effort and time the Review Committee made to ensure that the concerns and opinions of stakeholders across the territory were heard prior to drafting the plan, and that this plan may be guiding wolf conservation and management in the territory for many years to come, YCS hopes you will respect our request to extend the deadline to ensure that the public has the opportunity to have their views accurately represented in the plan.

Given that the Yukon election will be called imminently, a final decision should not, and likely cannot, be made by Yukon government until after the election. If Yukon government tries to push this plan through before the election, there is a risk that the Wolf Plan will become politicized, rather than continuing to be discussed in a productive, collaborative manner.

Comments on the Recommended Yukon Wolf Conservation and Management Plan August 2011

The Yukon Conservation Society (YCS) thanks the Review Committee and the others who supported the development of the recommended 2011 Yukon Wolf Conservation and Management Plan for their hard work; ensuring balanced consideration of the inherent right of wolves to exist, the range of values people place on wolves, and the desire in some communities to implement wolf control programs to increase human ungulate hunting opportunities is a challenging task.

YCS is pleased to see that First Nation governments, Inuvialuit, boards, councils and Yukon government have acknowledged the importance of information exchange - local, traditional and scientific - and that this commitment runs throughout the Plan through recommended implementation measures to support this exchange. Management and conservation efforts that sustain a species for the use and enjoyment of future generations

are in everyone's best interests, and timely, detailed information exchange that respects First Nation and Inuvialuit Final Agreements, can contribute to this. YCS hopes this spirit of cooperation extends beyond the wolf plan to management and conservation of other forms of Yukon wildlife, as species cannot be managed in isolation from one another.

YCS supports the Principles on page 8 of the Plan that will be used to guide work carried out to conserve and manage wolves in Yukon. We feel that these seven principles encapsulate the balanced, integrated approach that needs to be adopted when conducting any Yukon wolf conservation and management activity.

YCS is concerned, however, that some of the Goals and a number of the Recommended Implementation Measures in the Plan are not in keeping with these guiding Principles. Furthermore, some of these Recommended Implementation Measures are vaguely worded which, when taken out of context, could leave them open to potentially misguided interpretation and actions.

Our specific concerns are addressed below, organized under the headings used in the Plan itself.

The Management Context

Wolves in Yukon

In this section of the Plan, there is no discussion of wolf social behaviour and pack structure (indeed, throughout the entire plan only one reference is made to wolf packs on page 18). This is a serious oversight as wolf pack dynamics and pack territorial behaviour have important implications for ecosystem functioning and management actions. Wolves cannot be managed individually as this Plan may lead people to believe.

The 1992 Yukon Wolf Conservation and Management Plan includes a description that should be retained and expanded on given new developments in understanding of wolf pack behaviour and its management implications:

“To successfully hunt large mammals, wolves have evolved complex social behaviour that allows them to live in groups or packs. These packs are usually extended family units composed of a pair of breeding adults, their pups and older offspring. In the Yukon, packs average 7 or 8 in number, but they can commonly reach 16 to 20 animals. In most areas of the Yukon, wolves are territorial strongly defending their area from other wolves. This territorial behaviour has evolved to ensure the supply of large mammals is adequate for a pack of wolves to survive and successfully reproduce. The territory of a typical Yukon wolf pack is 600 to 1000 square kilometers in size, however in the far north of the Territory, wolves are migratory, living in packs that follow the seasonal movements of the Porcupine caribou herd.”

YCS is concerned about the implications of a section in the Recommended Plan that reads: “Currently wolves in Yukon are being harvested at roughly 2-3% annually. The current situation allows for flexibility in management, with no imminent threat of unsustainable harvest or loss of genetic diversity”. This sentence suggests a casual attitude towards wolf management that cannot be promoted. The grey wolf, once found throughout much of the northern hemisphere, has been extirpated from much of its former range. Canada (and in particular the Yukon) is one of the few places remaining with healthy and large wolf populations and we have a responsibility to the world to keep it this way - there is no room for ‘flexibility’ on this matter. We need to remember how limited our understanding of the planet’s ecology is, that we must be cautious in making statements expressing certainty and that there is still much to learn.

Management Regime - Local and regional management of wolves

YCS is concerned about the non-specific nature of the wording of the Recommended Implementation Measure on page 7 that reads “Amend the Yukon *Wildlife Act* and regulations to enable Renewable Resources Councils to establish bylaws.”

While the Plan does identify criteria for this Recommended Implementation Measure (conservation of the fur resource and the enhancement of Yukon’s fur industry), YCS feels that any proposed bylaws pertaining to wolf conservation and management should also have the Plan Principles (page 7) as criteria and that this should be included within the Implementation Measure. The revised Recommended Implementation Measure should read “Amend the Yukon *Wildlife Act* and regulations to enable Renewable Resources Councils to establish bylaws which adhere to the Plan Principles.” If the Wildlife Act is to be amended, more clarity is also required on the process for developing and approving bylaws of this nature as well as reporting mechanisms.

Management Goals

The Plan states “in cases of an emergency, the Minister may still consider aerial control of wolves and other measures as management options.” This statement is unacceptable when not accompanied by a description of a) conditions required before wolf reduction programs can be considered, b) guidelines for decisions on wolf reduction programs and c) implementation of and follow-up to wolf reduction programs.

As the 1992 Wolf Plan lays out in detail, this decision-making process should involve collecting information over a period of at least two years on wolves, ungulates, bears, habitat and the number of animals killed by people and then using this information to “help managers see whether or not wolves are limiting recovery of the ungulate population(s) and to tell whether wolf control would be much better than other ways of increasing ungulate populations such as stopping hunting or improving habitat” (p.11). All proposed wolf control programs, not just aerial programs, must have these strict guidelines regarding how to decide whether a wolf control program will be implemented.

The hugely resource intensive, government sponsored aerial control of wolves during the 1980s established that unless wolf reduction is sustained, aerial control is not a viable management tool; the insights gained from these control programs should not be ignored. The 2011 Plan needs to state much more strongly that there are many factors in addition to wolf predation which contribute to declining ungulate numbers and addressing these other factors may be much more effective over the long term in sustaining ungulate populations and conserving wolf populations.

The Government of Canada recently released a draft recovery strategy for woodland caribou. This recovery strategy ignores options to protect and restore caribou habitat in northeastern Alberta, instead proposing to rely on killing wolves to avoid having to put a limit on development. Is this the path the Yukon wants to take?

Goal 1: Conserve wolf populations in recognition of the role of wolves in ecosystems and the maintenance of biodiversity.

As the one goal in the Plan that addresses wolf conservation, the Recommended Implementation Measure accompanying Goal 1 needs to provide stronger protection measures for known wolf dens and wolf packs during the period of pup rearing. The 1992 Wolf Plan lasted 18 years - over the next 18 years and beyond, Yukon will see huge changes in land use and, while there may not be conservation concerns for wolves at the present time, cumulative impacts can change this. The Yukon cannot wait until wolf populations (or ungulate populations) are threatened before implementing strong protection measures. Since the Recommended Plan proposes other changes to the *Wildlife Act*, there is no reason not to propose that protection of dens and rearing sites is also included in the regulations.

Goal 2: Manage the harvest of wolves in recognition of their social, cultural and economic importance to all Yukoners.

Access to wolf trapping opportunities

As no Implementation Measure was recommended to address issues surrounding access to trapping opportunities, YCS hopes that the responsible parties are committed to resolving this issue in the near future given that the 2011 Wolf Plan promotes trapping as one of the primary wolf management tools available to communities.

Wolf harvest reporting, Wolf harvest reporting date and Wolf sealing (identification) method

YCS supports these Implementation Measures that are designed to streamline the harvest reporting and data collection processes.

Wolf Sealing Fee

YCS does not support removing the sealing fee for wolves harvest by licenced hunters. Wolves deserve the same respect as other big game animals that require tags purchased in advance. Removing the sealing fee and allowing hunters to shoot wolves opportunistically implies that wolves are a pest species of little value, which is contrary to the Plan's Principles and Goals.

Bag limit for wolves and Wolf hunting and trapping season

The Implementation Measures recommended under these topics promote an adaptive approach to wolf management, as is the case for bison and elk in Yukon. A key objective of the adaptive management frameworks used to manage elk and bison harvest is to set a number above which the population should not be allowed to increase. The goal of an adaptive management framework for wolves cannot be to set an upper population number against which the success or failure of the framework is measured – the focus must be on protecting a healthy Yukon wolf population that can continue to function in its vital ecosystem and biodiversity regulating role.

Ministerial ability to vary bag limits must be in keeping with the Plan Principles, in particular, recognition of the importance of wolves in the ecosystem. In setting these limits for wolves, it should be noted that the bag limit for grizzly bears, another carnivore that plays an important role in regulating ungulate numbers, is one bear for every three license years.

In recommending a measure to adaptively manage the wolf trapping and hunting seasons, seasons must continue to coincide with prime pelt conditions of wolves as people do not eat wolf meat – senseless waste of wolf lives cannot occur. Different bag limits and hunting and trapping seasons across the territory will require extensive communication between Yukon government, Inuvialuit, boards and councils, the public and prospective hunters to ensure changes are appropriate and there are no areas of confusion.

Training for wolf trappers

Trappers that are wolf trapping must be able to demonstrate proper wolf fur and pelt handling – pelts cannot be wasted.

Wolf trapping methods

Consistent with conservation ethics and Canada's role as a leader in trap research, humane methods of wolf trapping should not just be promoted but be required. A humane trapping requirement will be essential in conjunction with implementation of Goals 3 and 7 of the Plan.

Goal 3: Manage wolf populations in recognition of the enjoyment and appreciation that Yukoners and visitors have in experiencing wolves in Yukon wilderness.

We agree with Goal 3.

Goal 4: Use wolf harvest as a management tool to reduce predation rates of moose and caribou in local areas.

Discussed under this goal is the concern among many Yukoners that the limited entry permit system “is biased against local hunters by virtue of the fact the majority of those people licensed live in Whitehorse” and that, community members have expressed strong interest in exploring “the trapping and hunting of wolves to increase moose and caribou before harvest limitations are introduced.” YCS suggests that prior to community-led, localized wolf reduction programs which may have limited effectiveness as acknowledged by the Plan, consideration is given to changing the limited entry system to address concerns over unfair license allocation, to ensure that local hunters have fair access to ungulate hunting.

While YCS recognizes the importance of reflecting input from the consultation processes in the recommended Plan, we question the value of including some of the considerations outlined under this goal without further clarification of the context in which these considerations were discussed. In particular:

- Sustained success in any given area will lower the number of wolves, which increases the effort and expense of harvesting them; (This may or may not be true, and even if it is, what is the relevance – if the goal of wolf control is to reduce local wolf populations, why note that as a result, they become harder to kill?)
- The 48-hour aerial spotting limit on spotting and reporting from aircraft should be amended to provide flexibility in program areas; (No justification for this recommendation is provided, and spotting for wolves from the air comes close to aerial control, which the Recommended Plan does not support.)

YCS supports collaborative development of studies that consider local, traditional and scientific knowledge. As commented on previously under “Management Goals”, all proposed wolf reduction programs need to undergo a rigorous process of developing conditions, guidelines, and implementation follow-up. Consideration needs to be given to how wolf pack behaviour, in particular dispersal of older offspring, will affect the success of localized trapping and hunting efforts as measured by increased numbers of local ungulate populations. In turn, the effects of trapping and hunting on pack hierarchy and reproduction also needs to be considered.

Goal 5: Integrate ungulate management with wolf management goals.

YCS supports the Recommended Implementation Measures under this goal as they promote information exchange and collaborative design and implementation of ungulate

studies. YCS strongly agrees with the need for studies of the cumulative impacts of development on ungulate populations. However, no mention is made of using the information gained from ungulate studies to inform wolf management and conservation. Before decisions to undertake wolf kill programs are made, the full spectrum of reasons for ungulate population declines must be examined. If wolves are not the primary factor, ungulate declines must be addressed by changing other factors like human hunting, impacts from new access, habitat fragmentation, etc. Despite the complexity of an ecosystem approach, integrated management and conservation efforts are critical to ensuring populations of all Yukon wildlife are sustained.

Goal 6: Manage wolves to address human-wildlife conflict.

YCS feels this Goal should be amended to “Manage wolves and humans to address human-wildlife conflict” as much of what is discussed under this Goal and the accompanying Recommended Implementation Measure is how humans can reduce negative interactions with wolves through education, awareness and safe practices.

Goal 7: Promote research, education programs and information sharing to enhance understanding of wolf behaviour and ecology and management decisions affecting wolves.

YCS supports the Recommended Implementation Measures under this goal as they promote the timely exchange of traditional, local and scientific knowledge. However, the final Recommended Implementation Measure that addresses experiential learning programs should also include teaching about wolf ecology and behaviour not just conservation, management and harvesting practices.

YCS Concluding Comments

YCS is concerned that, although the Principles for this plan seem to support wolf conservation, the Implementation Measures deal almost entirely with wolf control. The Implementation Measures are far too likely to be taken out of context, allowing indiscriminate wolf kill programs without scientific basis or justification. The role of human hunting and other human caused impacts like roads and industrial activity must be acknowledged and addressed before wolf control programs are implemented.

Yukon society needs to answer a fundamental question: do we support wolf kill programs in order to increase human hunting of ungulates, or are we willing to live within the biological limits of Yukon ecosystems? The 1992 Wolf Plan did not propose wolf control programs as a way to increase or maintain levels of human ungulate hunting success; the 1992 Wolf Plan allowed for wolf kill programs if ungulate populations are in serious trouble. By recommending wolf control programs in order to increase human hunting opportunities, the Recommended Wolf Plan has taken a fundamentally different approach.

YCS does not believe that the Yukon public is aware of the new direction that the Recommended Plan has taken. The Recommended Plan needs to be publicized and the Yukon public needs an opportunity to understand and respond to it. Therefore the deadline for comments needs to be extended, and the Yukon government needs to be open to changing the Recommended Plan if the public calls for changes.

Sincerely,

A handwritten signature in cursive script that reads "Karen Baltgailis".

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