



April 30, 2019

Jennifer Psyllakis  
Director, Wildlife and Habitat  
Ministry of Forests, Lands and Natural Resource Operations  
PO Box 9391 STN PROV GOV'T  
Victoria BC V8W 9M3  
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Dear Ms Psyllakis,

**Re: Southern Lakes caribou and continued BC licensed harvest**

The Yukon Fish and Wildlife Management Board (the Board) is an advisory body established within the Yukon First Nations Final Agreements and the Umbrella Final Agreement (UFA) as the “Primary instrument of fish and wildlife management in the territory” (UFA, 16.7.1). While the Board appreciates that Taku River Tlingit First Nation is not a signatory to the UFA, because of the transboundary nature of this issue, and the involvement of several Yukon First Nations in the Southern Lakes Caribou Recovery Plan, we would like to express our support for the regulation change proposal currently before the Government of British Columbia regarding the Carcross Caribou herd (*Carcross Caribou Regulation Change Proposal 2020*).

The Board supports the proposal submitted to the Province of BC by Taku River Tlingit First Nation to close GMU 6-27 to caribou harvest (zero authorizations issued) until the herd has recovered to population levels agreed upon through a collaborative process such as the Southern Lakes Caribou Management Plan. The Board has remained in support of this proposal since it was first brought forward in 2017 and feels that this proposal should be implemented as quickly as possible given the conservation concerns outlined in the proposal document.

As per the UFA, management of all Fish and Wildlife resources and their habitats must ensure Conservation (UFA, 16.1.1.1), which means the management of both Fish and Wildlife populations and habitats *and* the regulation of users to ensure the quality, diversity and Long Term Optimum Productivity of Fish and Wildlife populations (UFA, Chapter 1 - Definitions).

Following this principle, the Yukon portion of the Southern Lakes caribou herds range has been closed to licensed hunting to support recovery of the herds, including for the Carcross herd whose range continuously extends into BC GMU 6-27. BC has acknowledged that the Atlin herd requires restrictions in GMU 6-25; however, BC has not yet extended restrictions to the



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Carcross herd. The current open season in the BC portion of the Carcross herd's range infringes on the recovery of the herd, and therefore infringes on the Aboriginal Right to harvest of six Southern Lakes First Nations, including Teslin Tlingit Council, Carcross/Tagish First Nation, Kwanlin Dun First Nation, Ta'an Kwach'an Council, Champagne & Aishihik First Nation, and Taku River Tlingit First Nation. For almost three decades, these First Nations in the Yukon and Northern BC have made considerable sacrifices by imposing a voluntary moratorium on harvest of caribou to recover these declining Southern Lakes herds.

The Board also supports the identification of the need for the adoption of a Southern Lakes Caribou Management Plan. This plan would cover all aspects of caribou management including habitat, cross-border collaboration, and harvesting allocations. The Board sees this Management Plan initiative as a means of moving forward respectfully with all management partners on the recovery of the herds and hopes that the BC government will commit to this process in good faith.

The Board would like to again recognize the significant sacrifice the Southern Lakes First Nations have made for over 20 years by limiting their harvest, and the positive impact this has had on the recovery of caribou in this region. We ask that the BC government implement this regulation to close all licensed harvest on the Carcross herd in GMU 6-27, and participate in the Southern Lakes Caribou Management Plan, in order to create a future where all Southern Lakes caribou herds are once again abundant on their lands and can meet the food, ceremonial, and spiritual needs for First Nations in the Southern Lakes area.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Burdek'.

John Burdek, Chair

Cc: Ryan LaPointe, Wildlife Coordinator, Taku River Tlingit First Nation

Kaitlin Wilson, Natural Resources Manager, Teslin Tlingit Council

Tami Grantham, HLNR Senior Manager, Carcross/Tagish First Nation