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**YUKON FISH AND WILDLIFE  
MANAGEMENT BOARD**  
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July 15, 2020

Honourable Minister Pauline Frost  
Minister of Environment  
Government of Yukon  
Box 2703  
Whitehorse, Yukon  
Y1A 2C6

Dear Minister Frost,

**Re: Communications between the Board and the Government**

Thank you for taking the time to meet with our new Executive in your office on Friday, June 26, 2020. It was an excellent opportunity to enhance our working relationship and promote an open dialogue between the Board and the Department of Environment.

We found the meeting to be positive and productive, and we would appreciate the opportunity to continue having these meetings on a semi-regular basis.

As an Executive, it is one of our primary objectives to improve the Board's working relationship and lines of communication with all government levels, including both settled and unsettled Yukon and transboundary First Nations.

In the spirit of openness and transparency, we would like to highlight a few instances from the past few months, which, we believe, demonstrate the need for us to improve in these areas.

By addressing these situations more directly and formally, we intend to foster respectful yet forthright dialogue. We must continue working together collaboratively to honor the spirit and intent of the Yukon First Nations Umbrella Final Agreement.

Recognizing the UFA establishes the Board as "the primary instrument of Fish and Wildlife Management in the Yukon" (16.7.1), we will certainly strive to be a leader in this undertaking. However, we must also recognize that the Board bases its recommendations on the level of technical expertise and advice that the government provides.

The following instances highlight recent Government communication outputs that have negatively impacted the Board. We believe that all parties involved would have benefitted from a more transparent and unified approach in each of these cases.

### **Eurasian Wild Boar**

On November 18, 2019, the Board submitted a letter to the Department of Environment and Energy, Mines and Resources, calling for an outright ban of all Eurasian Wild Boar in Yukon. This recommendation was clear and had the support of every RRC. However, it was not until after inquiring with a follow-up letter in the spring of 2020 that the Board finally received a response.

The response letter we received reads, "We believe the review of legislation creates an opportunity ... to deal with feral populations that exist now or may exist in the future."

The phrase, "may exist in the future," implies that there is a possibility these animals may continue to be imported and reared in Yukon. Perhaps our initial recommendation was not persuasive and thorough enough.

This Board, along with all the Renewable Resources Councils, and several First Nations, provided the Government with a clear and unified message on this matter. Together, our collective voices represent Yukoners at almost every level. There is simply no reasonable and justifiable future for this species in Yukon.

The Eurasian Wild Boar poses an unprecedented threat to Yukon's wildlife, and cannot exist in harmony with the native species of the territory. The economic benefits in no way justify the risk of extirpation posed to our fish and wildlife, and thereby our very cultural fabric.



### **Fortymile caribou herd winter hunt**

On December 31, 2019, the Government issued a press release about opening a new winter hunting opportunity for Fortymile caribou.

The first sentence reads, "Following a recommendation received from the Yukon Fish and Wildlife Management Board, the Government of Yukon is opening a licensed harvest on Fortymile caribou herd from January 1 to March 31, 2020."

While the Board did make a recommendation to open the hunt, the recommendation should have been characterized as support for the Hunt Plan presented to us by Fish and Wildlife Branch staff. If the legitimacy of this plan hinged on the Board's support, that certainly was not made clear in the presentation.

A significant factor in the Board's recommendation to support the Hunt Plan was due to Branch staff was citing severe conservation concerns, based on the most recent herd data.

The wording of this press release opens with mention of the Board's recommendation. This wording gives the impression that opening the hunt was a Board initiative, which it was not.

The details and particulars of the Hunt Plan were coordinated by the staff of Fish and Wildlife Branch and presented to the Board. In this presentation, we were assured that adequate consultation with Tr'ondëk Hwëch'in First Nation had taken place and that moving forward with this hunt was the right thing to do, both for the herd's health and Yukoners.

Later in the news release, the first line of the Minister's quote reads, "We are pleased to accept the Yukon Fish and Wildlife Management Board recommendation to offer Fortymile caribou harvesting opportunities...".

Again, this statement is misleading because the Board did not initiate this Hunt Plan, but it was implied that the Board's recommendation was the impetus for opening the hunt. The fragility of the herd's health and an explanation of the other conservation concerns should have been identified as the real motives for opening this hunt.

The press release states that the Government has worked with its partners for 25 years to recover the herd, and the recovery is sufficient to now warrant a limited hunt opportunity.

We understand this was not the Department's intent. However, the characterization that this hunt was opened due to a Board recommendation has strained our working relationship with the Tr'ondëk Hwëch'in First Nation.



## Dall Sheep Permit Hunt Authorization Assignment (GMZ 7 East)

On February 19, 2020, a regional biologist from Fish and Wildlife Branch gave a presentation to the Board outlining the proposed changes to sheep management and adding new permits to the remaining subzones in Game Management Zone (GMZ) 7 East. The changes presented to the Board were limited to changing the number of permits in this zone, and the implementation of managing Dall's sheep by Sheep Management Units, rather than by Game Management Subzone.

The Board subsequently advanced a set of recommendations to the Minister, which focused on putting the remaining subzones in GMZ 7 East on permit and managing sheep populations by Sheep Management Units. We were not informed that these new Sheep Management Units would also be used to manage sheep *harvest*. The fact that some of these Sheep Management Units would form "conglomerates" holding as many as 60 permits was also not shared with the Board.

After announcing these changes, the public was critical of the Department's new approach. Some members of the public are raising concerns over the potential for overharvesting and local extirpation, given the size of some of the new Sheep Management Units, and the proximity to major egress routes.

The Department of Environment once again validated this change by stating publicly that this approach was based upon "Board consultations on this issue in November 2015 and a subsequent Thinhorn Sheep Working Group recommendation". As you know, the Board does not Consult, nor do Working Groups make formal recommendations.

The Board's formal recommendations were as follows:

- That the Minister should place the remaining Game Management Subzones (7-13, 7-17, 7-20, 7-24, and 7-26) in Game Management Zone 'seven east' on permit for Dall's sheep as per the regulation change proposed in 2015-2016.
- That following appropriate consultation with affected parties (including the First Nations, RRCs, and the outfitter of the area), the Minister should revoke the 1993 Commissioner's agreement regarding special conditions placed upon the outfitter for Game Management Subzones 7-23 and 7-25 in Outfitting Area 17.
- That the Minister advance a regulation change to open Game Management Subzone 7-15 for limited entry harvest opportunities.
  
- That the Minister, in partnership with the Board and Department Staff, should redistribute Permit Hunt Authorizations throughout Game Management Zone seven east to accurately reflect the most recent population data, and this redistribution should include creating opportunities in game management subzone 7-19.

Once again, this miscommunication provides a false perception that the Board was solely responsible for the creation of harvesting based on Sheep Management Units.

As it stands, relations between the Board and the Government are suffering due to repeated instances of miscommunication, and the misrepresentation of the Board's role and responsibilities.

If we are to continue effectively managing Fish and Wildlife, then we need to begin working together as allies. That includes supporting each other when necessary and standing firm to our decisions, roles, and responsibilities when scrutinized by the public.

We ask you to join us in our endeavour to improve communication channels and transparency with all managing parties, in the interest of fulfilling our respective duties under the UFA, and in the name of achieving Conservation. We strongly believe this will serve to improve our overall understanding of our respective functions, roles, and responsibilities, as outlined within the UFA.

We look forward to working together with the Department, as well as the RRCs and the First Nations, in an increasingly open and collaborative manner. Thank you for your time in considering how we can improve upon this issue. We look forward to meeting with you again soon.

Sincerely,

Carl Sidney, Chair