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Joseph Judas, Chair
Wek'èezhii Renewable Resources Board

Delivered via email

October 23, 2020

RE: Revised Joint Tłı̨chq̓ Government-ENR Management Proposal for Wolves (Dìga) on the Bathurst and Bluenose-East Caribou Winter Ranges

Dear Mr. Judas:

The ᐱᕐᕈᕈᕐ ᑕᑦᕐᕐᕐ ᑕᑦᕐᕐᕐ ᑕᑦᕐᕐᕐ (Sahtú Renewable Resources Board – SRRB) thanks the WRRB for the opportunity to comment on the *Joint Proposal on Management Actions for Wolves (dìga) on the Bathurst and Bluenose-East Barren-ground Caribou (ᐱᕐᕈᕈᕐ) Herd Winter Ranges: 2020 – 2025* (“the Joint Proposal”). We understand that considerable work has been put into development of the proposal, including the Wolf Technical Feasibility Assessment (per the November 10, 2017 report), and the 2020 pilot project (per the report submitted with the revised Joint Proposal).

According to the Joint Proposal, “The goal of the proposed management actions is to sufficiently reduce wolf (dìga) predation on the Bathurst and Bluenose-East herds to allow for an increase in calf and adult caribou (ekwò) survival rates to contribute to the stabilization and recovery of both herds.” Proposed actions include 1. Enhanced support for dìga harvesters and the traditional economy (harvester training, harvest incentive program, harvest camps, use of baiting to support dìga removals); 2. Aerial dìga reduction actions; 3. Monitoring, research and assessment.

Targets for dìga removal are calculated using wolf (dìga) abundance estimates based on caribou (ekwò) density, extrapolated herd size and Ungulate Biomass Index. Based on experiences in other jurisdictions, the targets are set as a range representing 60-80% of the estimate, in order to achieve caribou population stabilization and recovery objectives. It is not clear whether or how Indigenous knowledge is applied in determining targets.

The WRRB's Notice of Decision of October 16, 2020 indicates that "that no significant public concern has been identified" with respect to the Joint Proposal, and therefore a public hearing will not be held for the 2020 Wolf Management Proceeding. The WRRB's Diga (Wolf) Management proceeding does however represent a valuable effort to compile traditional knowledge and science evidence on the topic of wolf management. The SRRB has planned a future Public Listening (Hearing) Session on *Caribou, Predators and Competitors*, and thus will carefully review the relevant evidence – including the WRRB's decisions document arising from the current proceeding.

In this letter, SRRB follows upon the October 16, 2020 letter of concern provided to the WRRB by the Délı̨ne Renewable Resources Council by providing additional relevant information, including evidence from the SRRB's 2016 Bluenose East Ɂekwé (Barren-Ground Caribou) Hearing¹ and Colville 2020 Public Listening (Hearing) Session on *Sahtú Ragóga (Hunting Laws) and Approaches to Wildlife Harvesting* (see Appendices A and B to this letter).

It is encouraging that the Joint Proposal is founded in an adaptive management approach, including a rigorous framework to evaluate the effectiveness of the program in achieving its stated goals and objectives. However, these goals and objectives are restricted to dı̨ga-Ɂekwé population management.² It would be helpful if critical socio-cultural factors identified in various submissions on the WRRB's public registry for this proceeding were also accounted for in the evaluation framework.

As the main instrument of wildlife management in the Sahtú region, the SRRB is interested in gathering further evidence about the possible impacts of dı̨ga management measures in Wek'èezhì on dı̨ga that follow Ɂehdaı̨la Ɂekwé (Bluenose East caribou) across the Sahtú (Délı̨ne District) boundary, as well as impacts on the health of the Ɂehdaı̨la Ɂekwé population. The SRRB is equally committed to understanding impacts of dı̨ga management actions on relationships among Indigenous peoples, dı̨ga and Ɂehdaı̨la Ɂekwé.

The SRRB notes that the Joint Proposal includes an engagement log with reference to an ENR meeting with the SRRB and Tulı́t'a Renewable Resource Council on January 30, 2019. We request a copy of ENR's notes from that meeting to assist in our understanding of the documented evidence with respect to cross-boundary implications of the Joint Proposal. It would also be helpful to be informed about efforts made to engage with the primary affected

¹ Briefly referred to in the Tı̨chq Government and ENR joint "Joint Wolf Diga Management Proposal: Responses to Information Requests Round No. 2." October 22, 2020.

² "The goal of the proposed management actions is to sufficiently reduce wolf (dı̨ga) predation on the Bathurst and Bluenose-East herds to allow for an increase in calf and adult caribou (ekwé) survival rates to contribute to the stabilization and recovery of both herds." Joint Proposal, August 25, 2020: 8.

party in the Sahtú region, the Délı̨ne Got'ı̨ne Government and Délı̨ne ʔehdzo Got'ı̨ne (Renewable Resources Council).

We understand that discussions between the Tłı̨chǫ Government and Délı̨ne Got'ı̨ne Government regarding shared traditional territory are ongoing, and we urge the WRRB to account for this in decisions related to management of wolves that also travel through this landscape.

Thank you for considering contributions from the Sahtú region in your decisions. We look forward to continued coordination with the WRRB to address shared concerns about caribou conservation measures.

Máhsı,

A handwritten signature in black ink, appearing to read 'Deborah Simmons', with a long horizontal stroke extending to the right.

Deborah Simmons
Executive Director

APPENDIX A

SRRB Bluenose East Hearing Theme 9 – ʔekwé Łákídákə (Predators)

Excerpted from ʔekwé hé Dene Ts'ı́ı - Sustaining Relationships: Final Report of the ʔehdzo Got'ı́ne Gots'é Nákedı Sahtú Renewable Resources Board Bluenose East ʔekwé (Caribou) Hearing 2016. 67-71.

The Délı́ne plan tells the story of ʔekwé and Díga (Wolf) godı kehtsı (making an agreement) to coexist, as an illustration of a Dene approach to understanding the relationship between ʔekwé and díga.³ The ENR plan outlines a pilot predator management program planned in collaboration with the Tı́chq Government (TG). In Part A of the report on its BNE ʔekwé Hearing, the WRRB recommended a “collaborative feasibility assessment of options for díga management, led by the Board” to complement the ENR-TG program.⁴ The SRRB heard further evidence about the planned predator management program when the SRRB attended the WRRB BNE ʔekwé Hearing in Behchokq. Control of ʔekwé łákídákə is an unresolved “Hot Topic” in the *Taking Care of Caribou* plan. Consistent with other forums, during its own Hearing, the SRRB heard evidence and questions about the effectiveness of ʔekwé łákídákə management actions in general, and díga management specifically.

When the earth was created, díga (wolf) and ʔekwé held a big meeting around the Aklavik area. Díga said to ʔekwé, "ʔekwé should not be on earth any longer." ʔekwé responded, "As long as we've been here, we've been good and we've eaten well. We've done nothing to you. We have not destroyed your food. You have lived well off us. So what's wrong with us?"

Díga said, "That's right. There's nothing wrong with ʔekwé. They don't get in anybody's way. So we shouldn't tell them what to do. Let them graze, and feed, and wander around. Let's not destroy them completely, because in the future we will need them."

– from *Belare wı́le Gots'é ʔekwé*, 5.

Dene Náoweró Evidence

The Délı́ne plan says that “we can't do much about predators because they need to achieve their own balance.”⁵ This is consistent with the ecological narrative in the keystone story of the meeting between díga and ʔekwé that frames the plan. The plan does note that disrespectful behaviour by ʔehdzo got'ı́ne (harvesters) like chasing ʔekwé can make them vulnerable to predators.⁶

³ DEWG, supra, footnote 3, 5, 15.

⁴ WRRB. 2016 (June 13). *WRRB Reasons for Decision Final Report, Part A – Bluenose-East Caribou Herd*, 50, WRRB PR 179.

⁵ DEWG, supra, footnote 3, 14.

⁶ DEWG, *ibid*, 28.

At the Hearing, Colville Chief Wilbert Kochon explained at length why deliberate programs of díga control are not considered appropriate, pointing out that the best form of “control” is for people to be exercising their traditional náts’ezé (harvest) practices on the land. For Chief Kochon, the concept of control is connected to people’s presence and ʔekwé hé Dene ts’ı́ı (sustaining relationships with ʔekwé).

Wolves are important for us, because they keep the caribou healthy. Always keeping the caribou moving. When you get rid of that balance, what happens then? When the caribou get sick, the wolves will kill it right away, and that sickness will never spread. If the caribou got sick and spread that sickness, the caribou will die faster in big numbers. So those kind of things you should really look at before you start killing so many wolves, or start putting bounties on it The way to control that is to be on the land. When you're on the land, the caribou comes around where you are, and the wolves stay away. Right now the wolves are just having a field day because there's nobody out there ... Maybe we have to work together more to try to control that. Not to wipe out the wolves, but control it more. And maybe try to get people out there more.⁷

ENR witnesses asked each community Party in turn about their perspective on díga control. In his response to one such query, Tulít'a Chief Frank Andrew echoed the view of his Colville counterpart:

The wolf are part of the caribou, from what I hear from my father way back, you know, when he said if there's a lot of caribou, there's a lot of wolves around it. It's always been like that, time immemorial, he said. So if we slaughter or kill all the wolves, then the caribou might disappear. So we have to think about this.⁸

SRRB Special Advisor and Tulít'a witness Leon Andrew provided supplementary testimony as a Shúhta Got'ı́ne (Mountain Dene):

The mountain Dene people respect the wolf in a way, because back in the ice age, the wolf kind of helped our people learn how to hunt. So that was the important role they played in the beginning of time, our life. So I really have respect for them. To go after the wolf and clean it out, or try to clean it out, I don't know. I have mixed feelings about that.⁹

Fort Good Hope witness Harry Harris described díga as “the doctor,” and recalled the traumatic experience of past government díga culling programs including the use of poison, which affected

⁷ HT March 1 (122:12-25, 123:1-16), PR 5.01.

⁸ HT March 3 (55:11-21), PR 5.03.

⁹ HT March 3 (56:7-19), PR 5.03.

other t̥ch'ád̥i (wildlife) as well. He testified that, in his view, “we should let nature take its course.”¹⁰

Similarly, the WRRB Traditional Knowledge Technical Session included a discussion of ʔekwé łákídákə. The summary report documented agreement that “wolves and bears have relations with caribou that are bigger than just their actions as predators.”¹¹

Likewise, the KHTO submission to the NWMB provided insights into a Kitikmeot Inuit perspective on relationships with both díga and sahcho (grizzly bears). It is notable that from a Dene náoweré perspective, Kitikmeot Inuit would be authorities on sahcho relationships with ʔekwé, since their primary interactions are reportedly at ʔekwé né golek'á (calving grounds). Like Colville witness Wilbert Kochon, the KHTO indicates that Inuit are the best positioned to ensure that ʔekwé relationships with ʔekwé łákídákə are in balance.

For years, the KHTO has expressed to the GN-DOE [Government of Nunavut-Department of Environment] the observations of the high number of predators, such as wolves and grizzly bears that are present in the range of the BNECH [BNE Caribou Herd]. Traditionally, Inuit have harvested wolves and grizzly bear in this area as part of day-to-day life on the land. Now that most Inuit spend the majority of their time in established communities, there are fewer Inuit on the land and less opportunity to harvest these animals.

Inuit have strong hunting skills in general, and there is a long history as wolf hunters. This combined with extensive traditional knowledge about wolves and grizzly bear give Inuit the ability to be very effective predator managers.¹²

Science Evidence

The number of caribou lost from BNE ʔekwé annually to predation by díga, sahcho, wolverines and eagles is a major question. The SRRB is aware that studies conducted on Porcupine ʔekwé (>100,000 individuals) have shown that díga kill about 7,600 bedzió (males) and tsída (females) annually, primarily during fall and winter.¹³ Some scientists have estimated that díga densities greater than 6.5/1000 km² will cause a herd to decline, while lower densities of díga will allow the herd to increase.¹⁴ An Alaskan study reported that sahcho killed from two tsíá (calves) per

¹⁰ HT March 3 (131:12-25, 132:1-2), PR 5.03.

¹¹ WRRB, supra, footnote **Error! Bookmark not defined.**, 9.

¹² KHTO, supra, footnote 57, 6.

¹³ R. D. Hayes, and D.E. Russell. 2000. Predation rates by wolves on the Porcupine caribou herd. *Rangifer* Special Issue 12: 51-58. As cited in C.R. Macdonald. 2016. *SRRB Final Technical Review - Science Advisor Colin Macdonald*, PR 3.17.

¹⁴ T. Bergerud. 1996. Evolving perspectives on caribou population dynamics, have we got it right yet? *Rangifer* Special Issue 9:95-115. As cited in C.R. Macdonald. 2016. *SRRB Final Technical Review - Science Advisor Colin Macdonald*, PR 3.17.

day for males to over 6 tsia/day for females with cubs, over the two weeks of the study.¹⁵

The extent of BNE ʔekwé losses to predation is unknown, as is the timing of when most losses occur during the annual cycle of calving, migration and overwintering. A recent study of díga distribution near the Bathurst herd indicates that as the herd declined and spent more time in its northern range in the summer, the pressure from díga was reduced due to the increased distance between the díga denning areas and the herd.¹⁶ ENR reported 4.43 active díga dens/1000 km in Bathurst ʔekwé habitat, based on an aerial survey flown in 2012. Díga dens were slightly more numerous than the lowest level of 3.55 dens/1000 km recorded in 2011.

A pup count in 2012 showed low numbers of pups per den, in addition to a generally low number of active dens.¹⁷ If this is also the case in BNE ʔekwé habitat, then predation from díga on the tundra will also decrease as the population declines and spends more time in the northern portion of its range.

ENR has responded to calls to reduce predation losses in the Bathurst and BNE herds with a general díga harvest program. However there have been no studies proposed to evaluate the effectiveness of the program in reducing predation losses or in aiding the recovery of the herds.

Balance of Evidence

The story about the meeting between ʔekwé and díga,¹⁸ shared in the Délıne plan, appears to be consistent with evidence from Colville, Tulít'a and Fort Good Hope witnesses at the Hearing that Sahtú Got'ıne are carrying forward teachings of the elders about ʔekwé hé díga ts'ılı (sustaining caribou-wolf relationships).

There is support for díga management programs in other regions, but there is also acknowledgement that further Dene náoweré and scientific research is needed to understand interactions of ʔekwé and díga in the context of ʔekwé decline, and to learn about approaches to supporting the appropriate balance.

The SRRB will review and evaluate the Wek'èezhı díga control feasibility study when it is complete, along with Dene náoweré from the Sahtú Region, as a basis for a future determination about whether a ʔekwé łákídákə management program should be put in place in the Sahtú.

¹⁵ D.D. Young, and T.R. McCabe. Grizzly bear predation rates on caribou calves in northeastern Alaska. *Journal of Wildlife Management* 61: 1056-1066. As cited in C.R. Macdonald. 2016. *SRRB Final Technical Review - Science Advisor Colin Macdonald*, PR 3.17.

¹⁶ M.R. Klaczek, C.J. Johnson and H.D. Cluff. 2016. Wolf-caribou dynamics within the central Canadian Arctic. *Journal of Wildlife Management* 80:837-849. As cited in C.R. Macdonald. 2016. *SRRB Final Technical Review - Science Advisor Colin Macdonald*, PR 3.17

¹⁷ ENR. 2014. *Barren-ground caribou 2012/2013 harvest & monitoring summary*. Submitted to the Barren-ground Technical Working Group.

¹⁸ DEWG, supra, footnote 3, 5, 15.

Research Priority

Hearing Decision 23

The ʔehdzo Got'ıne Gots'ę Nákedı (Sahtú Renewable Resources Board) will review and evaluate the Wek'èezhıı Renewable Resources Board's díga (wolf) control feasibility study when it is complete, and then engage in dialogue with ʔehdzo Got'ıne (Sahtú Renewable Resources Councils) to identify future research needs and whether a díga program should be put in place in the Sahtú Region.

APPENDIX B

Excerpts from Colville 2020 Public Listening Session – *Sahtú Ragóza (Hunting Law) and Approaches to Wildlife Harvesting*

Note that as of October 23, 2020 the SRRB's report on the Colville 2020 Public Listening Session had not yet been published. Although predator-caribou relationships was not a focus of the 2020 Session, the Colville and Norman Wells Panels provided evidence on the topic as part of the larger question posed by the SRRB for its five part Public Listening series: "What is the most effective way to conserve caribou?"

Government or researchers used the poison, that type of stuff, to kill off wolves, that kind of stuff. So the history kind of really laid out kind of the precautionaries for our Elders to make sure they keep track of everything. And so what we're doing today is just making sure we carry on that tradition into the forefront so that we know exactly what's happening to our animals. – *Joseph Kochon, Colville Lake Panel, January 21. 102:7-16.*

The wolf is not bad. Sometimes what the wolf does is get the caribou that is not healthy. And so we have to take care of our wildlife, our caribou, and it's okay for the wolf to be in amongst them. Sometimes they catch or they get the caribou that are not healthy, and that's how it keeps it balanced So when you overdo killing some certain animal, they're going to come back more. Like what they're doing with the wolves now, they're going to come back more. – *Chief Wilbert Kochon, Colville Lake Panel, January 21, 2020. 281:20-25; 282:1; 283:23-25; 284:1.*

Predator population control. We do not agree with predator population control, which is the culling of wolves, bears, wolverines. We don't agree with that. It's been brought up about wolf culls. – *Roger Odgaard, Norman Wells Panel, January 22. 24:4-8.*