

Mutually-Engaged Wolf-Human Relations: Indigenous Human Rights and Wild Animal Rights in the United States

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1. Introduction

Legal protections for wolves in recovery from near extinction are inconsistent and fluctuating across the United States. Some wolf populations receive federal protection.¹ Others are the target of aggressive hunting – a legacy of the ‘Western hierarchical relationship of human’ as superior over animals.² The persecution of wolves and ‘hate narratives’ began with the arrival of Euro-Americans and continue to dominate human-wolf decision-making in North America today.³ Yet, these relational dynamics contrast with the reciprocal, appreciative, and harmonious relations Native Americans have with wolves – as teachers, protectors, guides, and family members.⁴

This article begins by examining Native American views of, and responses to, recent U.S. federal and state wolf decision-making, including North American Tribal Nations’ unequivocal and united condemnation of State-sanctioned harm to wolves. Ancient and enduring relations with wolves are further considered, pointing to the indivisibility of cultural, environmental, and wolf rights for Native Americans. The analysis explores how the relationship between Native American and wolves contrasts, and addresses, anthropocentric hierarchies and hegemonic dynamics found in wolf decision-making and contemporary animal rights discourse. A key distinction is that Native American-wolf relations are mutually-engaging – simultaneously disrupting stereotypes about wolves as dangerous, disinterested, or unable to co-shape decisions. These interwoven wolf-human relations are based on equitable partnerships, whereby humans and wolves co-shape exchanges, contributions are appreciated by each other, and interactions are spiritually and culturally sustaining. Put another way, Tribal-wolf relations are synonymous with empowering wolf agency to determine their own life path, relationships, family, and territorial sizes. This lifeway also offers practical guidance on how to center, respect, and reverence for a diversity of lively relatives in an active cultivation of reciprocal and respectful exchanges. Finally, this article is, in part, a response to ongoing silencing of Naive American understandings of, and relations with, wolves in decision-

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¹ Endangered and Threatened Wildlife Plants, 85 FR 69778, effective on 4 January 2021.

² Dennis Vasilis Papadopoulos, ‘Politically Engaged Wild Animals’ (Dissertation, University of York, September 2021) <yorkspace.library.yorku.ca/server/api/core/bitstreams/9bc9aaab-a9fa-4a84-b7e7-bbee3e3d1cf0/content> accessed 23 January 2024, 8. His use of the word engaged inspired my title.

³ Kayleigh Moses, ‘Indians, Wolves, and Colonists: How Colonial Power Left an Incomplete Framework for Wolf Narratives in the Native Northeast’ (2022) *The Trinity Papers (2011 - Present)* <digitalrepository.trincoll.edu/cgi/viewcontent.cgi?article=1106&context=trinitypapers> accessed 23 January 2024, 6.

⁴ The traditions of the Cheyenne and Blackfeet Tribes living with wild wolves and the Shoshone living with socialized wolves are described in Brandy R Fogg, Nimachia Howe, and Raymond Pierotti, ‘Relationships Between Indigenous American Peoples and Wolves 1: Wolves as Teachers and Guides’ (2015) 35 *Journal of Ethnobiology* 262, 267.

making processes.⁵ It is not intended to be a substitute for meaningful and thorough consultations with, and consent from, First/Tribal Nations or peoples on any matter related to wolves.

2. The Wolf-Human Relations that Matter

[T]he howl became a word, a name. Wa'ya to the Cherokee, to whom the mountains also listened in the old time. Son of the wind; companion to Kana'ti; father of Ani'-Wa'ya, the Wolf people, principal clan. Familiar spirit ... Perfect walker. Far traveler
Christopher Camuto⁶

Contemporary legal and political systems have formed around diverse interspecies relations, where some voices are heard (or not) and certain animal-human relations come to matter.⁷ Generally speaking, anthropocentric Euro-American white settler-voices and domination-power-dynamics direct contemporary political and legal wolf decision-making in North America. Conversely, less or non-anthropocentric voices and mutually-respectful reciprocal relations, such as those existing between wolves and Native Americans, are less prominent and de-valued.⁸ The former human-wolf relations have received extensive attention and legitimization in the law and literature on wolves.⁹ Meanwhile the latter, which reflects possibilities for more peaceful and kind wolf-human relations, remains under-explored and somewhat ignored. These imbalances reflect structural and social inequalities, as well as limited attention to empowering wolves to flourish 'in their own way'.¹⁰ The de-listing of gray wolves (*Canis lupus*) from the Endangered Species Act in late 2020 effectively turned wolf decision-making over to the states. Its aftermath brought relations between wolves and humans to a head by highlighting, inter alia, the diversity of human-wolf relations within local communities,¹¹ the influence of politics,¹² and the power dynamics at play between different interest groups and branches of government.¹³

⁵ George Tinker, *Spirit and resistance: Political theology and American Indian liberation* (Fortress Press 2004) 6.

⁶ Christopher Camuto, *Journeying Toward the Cherokee Mountains* (Georgia Press 1997) quoted in United States Fish and Wildlife Service, 'Far Traveler: A Teacher's Companion to Red Wolf Recovery' (January 2008) <redwolves.com/newsite/wp-content/uploads/2017/02/far_traveler_2008.pdf> accessed on 23 January 2024, 3.

⁷ Marianne E Lien, 'What's Love Got to Do with It? Care, Curiosity, and Commitment in Ethnography beyond the Human' (2022) 14 *Environmental Humanities* 457, 457.

⁸ There are many examples of legal and conservation scholarship on wolves which are silent on indigenous perspectives and rights. See Catherine Danley, 'The Decline of Denali's Wolves: Federal Options in the Face of Non-Cooperative Wildlife Federalism' (2019) 34 *Brigham Young University Journal of Public Law* 1; Francisco J Santiago-Ávila and Adrian Treves, 'Poaching of Protected Wolves Fluctuated Seasonally and with Non-Wolf Hunting' (2022) 12 *Scientific Reports* 1; Holly Firlein, 'Continental Divides: How Wolf Conservation in the United States and Europe Impacts Rural Attitudes' (2018) 45 *Ecology Law Quarterly* 327; Nicole M Tadano, 'Piecemeal Delisting: Designating Distinct Population Segments for the Purpose of Delisting Gray Wolf Populations is Arbitrary and Capricious' (2007) 82 *Washington Law Review* 795.

⁹ Examples in media include Katie Shepard, 'Montana's Governor Broke Rules to Kill a Yellowstone Wolf: A State Agency Gave him a Warning' *Washington Post* (24 March 2022) <www.washingtonpost.com/nation/2021/03/24/montana-greg-gianforte-wolf/> accessed 23 January 2024; Ted Williams, 'America's New War on Wolves and Why It Must Be Stopped' *Yale Environment* 360 (17 February 2022) <e360.yale.edu/features/americas-new-war-on-wolves-and-why-it-must-be-stopped> accessed 23 January 2024.

¹⁰ Martha C Nussbaum, 'Working With and For Animals: Getting the Theoretical Framework Right' (2017) 94 *Denver Law Review* 609, 623. On structural inequalities and the continued exercise (or abuse) of power over animals, sometimes referred to as 'biopower domination', see Dinesh Wadiwel, *The War Against Animals* (Brill 2015).

¹¹ And how hunting voices, which are in the minority, have considerable sway in these decisions. See note 14 below.

¹² Wolf decision-makers are politically appointed, see Leah Campbell, 'A Fight Over Wolves Pits Facts Against Feelings in Wisconsin' *UNDARK* (6 June 2022) <undark.org/2022/06/06/a-fight-over-wolves-pits-facts-against-feelings-in-wisconsin/> accessed on 23 January 2024.

¹³ idem; Robert Keiter, 'Grizzlies, Wolves, and Law in the Greater Yellowstone Ecosystem: Wildlife Management Amidst Jurisdictional Complexity and Tension' (2022) 22 *Wyoming Law Review* 303.

In February 2021, significant harm was inflicted on wolves in Wisconsin, when hunters killed 218 wolves in 63 hours during breeding season.¹⁴ This equated to one wolf being killed every 17 minutes day and night.¹⁵ It reduced the wolf population by 15 to 20 percent,¹⁶ without respecting tribal-wolf relations or the tribal allocation of wolves enshrined in treaty rights.¹⁷ The Ojibwe people had a ‘visceral reaction’ to this slaughter, as ‘Ma’ingan’ (how they call the wolf) are ‘relatives whose fates are intertwined’.¹⁸ A second wolf hunt scheduled for 2021 was halted by a county court just two weeks before it was set to take place.¹⁹

At the regional level, North American Tribal Nations, on both sides of the Canadian-United States border, responded strongly to anti-wolf developments in the United States by launching ‘The Wolf: A Treaty of Cultural and Environmental Survival’.²⁰ This treaty intertwines the rights of wolves with indigenous human rights.²¹ Its purpose is to ‘honor, recognize, and revitalize the ancient relationship’ with wolves and to ‘welcome the wolf to once again live beside us’ to ‘nurture each other culturally and spiritually’.²² The Wolf Treaty recalls the United Nations Declaration on the Rights of Indigenous People (UNDRIP).²³ It notes that what happens to wolves in the United States also impacts wolves in Canada and Mexico. Thus, it aims to ‘protect and recover the wolf – and by doing so protect, preserve and perpetuate indigenous cultures’.²⁴ In thirteen articles, the Wolf Treaty sets out Tribal/First Nations’ position on behalf of wolves.²⁵ Tribal Nations also made public submissions to the United States’ Fish and Wildlife Service despite the requirement for

¹⁴ Hunter Nation Inc v Wisconsin Department of Natural Resources, Declaratory Judgement 30701, 2 February, Wisconsin Circuit (2021). See also notes 15 and 16 below.

¹⁵ However the number of wolves injured is likely higher as ‘the number of unrecovered crippling loss or animals intentionally left unretrieved is unknown’, Jonathan H Gilbert et al, ‘Ojibwe Perspectives Toward Proper Wolf Stewardship and Wisconsin’s February 2021 Wolf Hunting Season’ (2022) 10 *Frontiers in Ecology and Evolution* 1, 2.

¹⁶ According to the Department of Natural Resources, wolf populations were reduced by 15%. See Danielle Kaeding, ‘DNR: Wisconsin Wolf Population Dropped 14 Percent after Controversial Wolf Hunt Last Year’ *Wisconsin Public Radio* (20 September 2022) <www.wpr.org/dnr-wisconsin-wolf-population-dropped-14-percent-after-controversial-wolf-hunt-last-year> accessed 23 January 2024 According to modeling and populations estimates, the real impact was closer to 20%. See note 17 below.

¹⁷ Of the total hunting quota of 200 wolves, the Ojibwe people claimed a treaty allocation of 81 wolves, which they planned to protect. See Jonathan H Gilbert et al, ‘Ojibwe Perspectives Toward Proper Wolf Stewardship and Wisconsin’s February 2021 Wolf Hunting Season’ (2022) 10 *Frontiers in Ecology and Evolution* 1, 2, See also the law suit filed on their behalf, *Red Cliff Band of Lake Superior Chippewa Indians of Wisconsin v. Preston Cole*, Case 3:21-cv-00597 <earthjustice.org/sites/default/files/files/wisc-case.pdf> accessed 23 January 2024, dismissed without prejudice on 26 April 2022.

¹⁸ ‘Slaughter’ is the word used by the Ojibwe to describe the hunt, see Jonathan H Gilbert et al, ‘Ojibwe Perspectives Toward Proper Wolf Stewardship and Wisconsin’s February 2021 Wolf Hunting Season’ (2022) 10 *Frontiers in Ecology and Evolution* 1.

¹⁹ Danielle Kaeding, ‘Dane County Judge Temporarily Bars Wisconsin’s Wolf Hunt, Orders DNR to Set Quota of Zero Wolves’ *Wisconsin Public Radio* (22 October 2021) <www.wpr.org/dane-county-judge-temporarily-bars-wisconsin-wolf-hunt-orders-dnr-set-quota-zero-wolves> accessed 23 January 2024; *Great Lakes Wildlife Alliance et al v. Wisconsin Natural Resources Board et al*, Circuit Court, Dane County, Wisconsin 2021, Cvo02103.

²⁰ Global Indigenous Council, ‘The Wolf: A Treaty of Cultural and Environmental Survival’ (Wolf Treaty) <www.globalindigenouscouncil.com/wolf-treaty> accessed 23 January 2024, art II - Culture.

²¹ *ibid*, including the Canadian Assembly of First Nations.

²² *ibid*, Purpose and Objective, 1.

²³ United Nations General Assembly (UNGA), United Nations Declaration on the Rights of Indigenous People (13 September 2007) 61/295 (UNDRIP), endorsed by the United States in 2010.

²⁴ Wolf Treaty, Purpose and Objective, 1.

²⁵ *ibid*, Conservation; Culture; Management Principles; Recovery Objectives, Native American Endangered Species Act; Economics; Education; Hunting; Research; Threats; Conflict Resolution; and Partnerships, 1–6.

government-to-government consultations.²⁶ All Tribes emphasized the absence of, and a desire for, ‘thorough’ and ‘meaningful’ consultations to be initiated at the federal level with the Fish and Wildlife Service and the Department of the Interior on any decision to delist grey wolves from the Endangered Species Act.²⁷

Native American Tribal Nations see the de-listing of wolves, as well as the hunting or culling of wolves,²⁸ as a ‘destruction of their culture’²⁹ and a violation of human rights.³⁰ Various tribal resolutions have reinforced this position.³¹ For Tribal Nations, harm to wolves jeopardizes religious and spiritual freedoms, treaty rights, tribal sovereignty, and violates the UNDRIP, in particular the right to ‘free, prior and informed consent’.³² Particularly pertinent in relation to legal protections for wolves are the rights of indigenous peoples to conserve animals and ‘to maintain and strengthen distinctive spiritual relationship with their traditionally owned or otherwise occupied and used lands, territories, and waters and coastal seas’ and the obligation of States to ‘give legal recognition and protection’ with ‘due respect to the customs, traditions and land tenure systems of the Indigenous peoples’.³³ International environmental instruments reinforce respect for indigenous knowledge and practices, but fall short of explicitly referring to wild animals.³⁴

The Global Indigenous Council released a short film about the sacred connection between Native American people and wolves called ‘Family’. The film ends with a sober statistic that ‘wolves are functionally extinct in over 85% of their former range across continental United States’ and a request to protect wolves ‘before it’s too late’.³⁵ The issue is raw for Native Americans who have been here before on behalf of other wild animals.³⁶

²⁶ Executive Order 13175, ‘Consultation and Coordination With Indian Tribal Governments’ (6 November 2000) 65 FR 67249.

²⁷ Wolf Treaty. See also public submission by Tribal Nations notes 66–72 below.

²⁸ Including trophy or sport hunting, which harms tribal eco-tourism programs. See, Rocky Mountain Tribal Leaders Council, ‘RE: The US Fish and Wildlife Service (FWS) Proposed Rule: Endangered and Threatened Wildlife and Plants; Removing the Gray Wolf (*Canis lupus*) from the List of Endangered and Threatened Wildlife’ (10 July 2019) <www.globalindigenouscouncil.com/files/ugd/13fe3b_459a373ae3f34236bb7633063775f4dc.pdf> accessed 23 January 2024, 1.

²⁹ UNDRIP, art 8.

³⁰ Native American Tribal Nations previously defended against changes in the endangered status of the Grizzly Bear under the Endangered Species Act in *Crow Tribe et al v. Zinke*, CV 17-89-M-DLC (5 December 2017) US District Court for the District of Montana.

³¹ See for example, United Tribes of Michigan, ‘Resolution 036 2-11-2015: United Tribes of Michigan Opposition to Removal of Protections for the Great Lakes Gray Wolf’ (11 February 2015) <blog.humanesociety.org/wp-content/uploads/2015/02/036_02112015_oppose_removal_of_protection_for_wolves1.pdf> accessed 23 January 2024.

³² UNDRIP art 19; Great Plains Tribal Chairmans Commission, ‘RE: The US Fish and Wildlife Service (FWS) Proposed Rule: Endangered and Threatened Wildlife and Plants; Removing the Gray Wolf (*Canis lupus*) from the List of Endangered and Threatened Wildlife’ (10 July 2019) <www.globalindigenouscouncil.com/files/ugd/13fe3b_cd4d1c382cf94e239b6e1c03f29324bd.pdf> accessed 23 January 2024, 2.

³³ UNDRIP, arts 24, 25, 26.

³⁴ E.g., United Nations General Assembly, Rio Declaration on Environment and Development (12 August 1992) A/CONF.151/26; Convention on Biological Diversity (CBD), 5 June 1992, 1760 UNTS 79, entered into force 29 December 1993, art 8 (j).

³⁵ YouTube, ‘Family’ (7 July 2021) Global Indigenous Council <youtu.be/8ZWmfMK6bfc> accessed 23 January 2024, a new short film asking Sec. Haaland to re-list the wolf under the Endangered Species Act.

³⁶ Such as the Grizzly Bear, see Louisa Willcox, ‘Tribes Make History with Signing of Grizzly Bear Treaty’, *CounterPunch* (30 September 2016) <www.counterpunch.org/2016/09/30/tribes-make-history-with-signing-of-grizzly-bear-treaty/> accessed 23 January 2024.

Diverse relational dynamics between humans and wolf-subspecies, which are treated differently under the Endangered Species Act, are also playing out in the United States. In Alaska, a federal Species Status Assessment is underway for Alexander Archipelago wolves (*Canis lupus ligoni*). These wolves hold special significance for the Tlingit People,³⁷ following a devastating no-limit two month hunting and trapping season endorsed by the state.³⁸ In July 2022, the federal government halted the killing of Mexican Gray Wolves (*Canis lupus baileyi*) in Arizona, called Ba'cho by the White Mountain Apache Tribe.³⁹ This followed a court order to revise the recovery plan to respond to human-caused mortality,⁴⁰ including illegal killing which accounts for 74% of fatalities.⁴¹ The 21 wild Red Wolves (*Canis rufus*) in North Carolina, known as Wa'ya by the Cherokee People, are known individually by alpha-numeric codes following captive breeding and reintroduction, after being declared functionally extinct in 1980.⁴²

Federal protections were reinstated for gray wolves across the lower-48 states in early 2022.⁴³ However, they do not apply to the 'Northern Rocky' wolves in Idaho, Wyoming, or Montana.⁴⁴ In these states, aggressive hunting is permitted by cruel methods, without input from Native Americans, which impacts 'tribal sovereignty and silences Native voices'.⁴⁵ In an emergency petition, nearly 200 Tribal Nations called for the Northern Rocky wolves, and all wolves in the United States, to be restored to the Endangered Species Act.⁴⁶ The United States Fish and Wildlife Service issued a commitment to conduct stakeholder engagement with the intent of proposing a new

³⁷ United States Fish and Wildlife Service, Proposed Rule, 86 FR 40186 (27 July 2021) 2021-15497; YouTube, 'Gooch: Wolves in Tlingit Culture and Experience' (25 October 2022) Sealaska Heritage Institute <youtu.be/TTGQbq0B3VE> accessed 23 January 2024.

³⁸ During the 2019–2020 trapping season 165 wolves were 'legally trapped from a population last estimated at 170 wolves', see Center for Biological Diversity et al, 'Petition to List the Alexander Archipelago Wolf (*Canis lupus ligoni*) in South East Alaska as Threatened or Endangered Under the U.S. Endangered Species Act' (15 July 2020) <www.krbd.org/wp-content/uploads/2020/07/20-07-15-Petition-to-list-the-Alexander-Archipelago-wolf-in-Southeast-Alaska-under-the-ESA.pdf>, 9; Jacob Resneck, 'Prince of Wales Trappers Report 68 Wolves Taken in 2020' *KRBD* (20 January 2021) <www.krbd.org/2021/01/20/prince-of-wales-trappers-report-68-wolves-taken-in-2020/> accessed 23 January 2024.

³⁹ United States Fish and Wildlife Service, 'Endangered and Threatened Wildlife and Plants; Revision to the Nonessential Experimental Population of the Mexican Wolf' (1 July 2022) Final Rule, RIN 1018–BE52, effective 1 August 2022.

⁴⁰ *Centre for Biological Diversity v. Haaland* (14 October 2021) 562 F Supp 3d 68, United States District Court, District of Arizona.

⁴¹ United States Fish and Wildlife Service, Endangered and Threatened Wildlife and Plants; Draft Recovery Plan for the Mexican Wolf, Second Revision, 14 April 2021

⁴² United States Fish and Wildlife Service, 'Red Wolf Recovery Program' <www.fws.gov/project/red-wolf-recovery-program> accessed 23 January 2024.

⁴³ *Defenders of Wildlife v. U.S. Fish and Wildlife Service* (10 February 2022), California District Court; Edward A. Fitzgerald, 'Premature Gray Wolf Delisting' (2022) 62 *Natural Resources Journal* 183.

⁴⁴ 76 FR 25,590 (5 May 2011) on 2011 Northern Rockies Delisting Rule for Idaho & Montana; 77 FR 55,530 (10 September 2012) for Wyoming vacated then reinstated by *Def. of Wildlife v. Zinke* (2017) 849 F.3d 1077, 1081, D.C. Circuit; United States Fish and Wildlife Service, '2022 Gray Wolf Questions and Answers' (11 February 2022) <www.fws.gov/sites/default/files/documents/2022-Gray-Wolf-FAQs.pdf> accessed 23 January 2024.

⁴⁵ Relist Wolves, 'Tribal Consultation' <www.relistwolves.org/tribes> accessed 23 January 2024.

⁴⁶ *ibid*; Ted Williams, 'America's New War on Wolves and Why It Must Be Stopped' *Yale Environment* 360 (17 February 2022) <e360.yale.edu/features/americas-new-war-on-wolves-and-why-it-must-be-stopped> accessed 23 January 2024.

rule for grey wolves by early 2024.⁴⁷ However, at the end of 2023, an independently facilitated National Dialogue for Wolves was announced, which is set to run into 2026.⁴⁸

In examining the diversity of human-wolf relations,⁴⁹ it becomes apparent that animal rights approaches arising from settler colonial world views cannot address conflicts between human-led institutions and wild animals.⁵⁰ The majority of animal rights scholars also refer to ‘non-human animals’ in the aggregated abstract. This in itself embodies a form of violence and neglects the nuance of species-specific considerations and relations.⁵¹ Moreover, the persistent invisibility of tribal-wolf relations in contemporary academic discourse and administrative decision-making raises questions on social justice, equality, and human rights. The following section brings to the fore Native American relational dynamics with wolves. In doing so, it draws attention to the indivisibility of cultural, environmental, and wild animal rights for Tribal Nations.

3. Native American Relationships with Wolves

In describing the relational dynamics between Native Americans and wolves, numerous similarities can be found as many Tribal Nations share cultural practices akin to each other. Yet, subtle and stark differences do exist.⁵² Tribal-wolf relations also have broader applicability as it is not only wolves which are viewed as family, but all animals,⁵³ and natural elements.⁵⁴ In contrast to mainstream western-liberal views, which generally consider non-human animals as inferior,⁵⁵ the Native American world view sees animals to be equal or superior to humans.⁵⁶ The first sub-section

⁴⁷ United States Fish and Wildlife Service, ‘Statement on the Gray Wolf in the Lower-48 United States’ (13 February 2023) <www.fws.gov/sites/default/files/documents/2023%20USFWS%20Gray%20Wolf%20Statement.pdf> accessed 23 January 2024.

⁴⁸ United States Fish and Wildlife Service, ‘National Dialogue Initiated on Working Landscapes and Gray Wolves’ (13 December 2023) <<https://www.fws.gov/press-release/2023-12/national-dialogue-initiated-working-landscapes-and-gray-wolves>> accessed 26 January 2024.

⁴⁹ For diverse views on wolves, see for example, Jerry Vaske et al, ‘Attitudes, Emotions, and Acceptance of Wolf Management in Illinois’ (2021) 27 *Human Dimensions of Wildlife* 1; Karen Jones, ‘From Big Bad Wolf to Ecological Hero: Canis Lupus and the Culture(s) of Nature in the American–Canadian West (2010) 40 *American Review of Canadian Studies* 338.

⁵⁰ Dennis Vasilis Papadopoulos, ‘Politically Engaged Wild Animals’ (Dissertation, University of York, September 2021) <yorkspace.library.yorku.ca/server/api/core/bitstreams/9bc9aaab-a9fa-4a84-b7e7-bbee3e3d1cf0/content> accessed 23 January 2024, 2.

⁵¹ I also use the term ‘animal’ for simplicity, although I wish I had the creativity and where-with-all to define a more appropriate and respectful term. For the violence inherent in this terminology, see Lynn Worsham, ‘Toward an Understanding of Human Violence: Cultural Studies, Animal Studies, and the Promise of Posthumanism’ (2013) 35 *Review of Education, Pedagogy, and Cultural Studies* 51.

⁵² Brandy R Fogg, Nimachia Howe, and Raymond Pierotti, ‘Relationships Between Indigenous American Peoples and Wolves I: Wolves as Teachers and Guides’ (2015) 35 *Journal of Ethnobiology* 262; Margaret Robinson, ‘Animal Personhood in Mi’kmaq Perspective’ (2014) 4 *Societies* 672; For an example of differences, Tlingit peoples, at times, would hunt wolves, but they still respected them, see Bob Jickling and Paul C Paquet, ‘Wolf stories: Reflections on Science, Ethics, and Epistemology’ (2005) 27 *Environmental Ethics* 115, 127.

⁵³ Another well-documented example is the interwoven Gwich’in-Porcupine Caribou relationship, see Sarah Agnes James, ‘The Gwich’in Are Caribou People’ in Daniel M Cobb, *Say We Are Nations: Documents of Politics and Protest in Indigenous America Since 1887* (University of North Carolina Press 2015) 230.

⁵⁴ Anishinaabe scholar John Borrows shares how the abundance of the river are ‘acts of love’ in Dennis Vasilis Papadopoulos, ‘Politically Engaged Wild Animals’ (Dissertation, University of York, September 2021) <yorkspace.library.yorku.ca/server/api/core/bitstreams/9bc9aaab-a9fa-4a84-b7e7-bbee3e3d1cf0/content> accessed 23 January 2024, 102.

⁵⁵ Eva Meijer, ‘Speaking with Animals: Philosophical Interspecies Investigations’ in Morten ristinilver (eds), *Thinking about Animals in the Age of the Anthropocene* (Lexington Books 2016) 73.

⁵⁶ Nolan Yellow Kidney, Blackfeet Sun Dance Leader, unnamed video on Global Indigenous Council website at 1:44 min, <www.globalindigenouscouncil.com/wolf-treaty> accessed 23 January 2024.

teases out some of the underlying differences between Native American and western views, as well as how Native American relationality with wolves (and other animals) addresses some gaps and limitations in existing theories of wild animal rights.

3.1 Tribal-Wolf Relations

In pre-colonial times, the relationships between Native Americans and wolves, which are well-documented, are described as reciprocal, respectful, cooperative, and brotherly.⁵⁷ These dynamics were expressed through life practices between Tribes and wolves, such as living and working with both wild and socialized wolves, hunting and sharing food together, feeding wolves first, protecting each other, letting wolves take the lead, singing songs to encourage wolves to join them, and offering each other friendly-companionship.⁵⁸

Some tribes, such as the Cheyenne, could ‘understand the speech’ of wolves, a skill learned by living with them.⁵⁹ By listening to howls, they could anticipate events, prepare themselves, and potentially warn others. The Algonquian peoples communicate directly with wolves – as the Algonquin languages are part of the knowing of the land and can be understood by all animals.⁶⁰ There are also many accounts, from different tribes, of wolves rescuing, feeding, or guiding them, when they were injured, hungry, or lost.⁶¹ The relations are mutually-engaged and reciprocal because both wolves and Native Americans were free to choose when, and how, to interact (or not).

The submissions by Tribal Nations to the United States’ Fish and Wildlife Service all strongly opposed the de-listing of gray wolves from the Endangered Species Act. They repeatedly refer to relations with wolves. Some themes reoccur frequently.

For the Oneida Nation, wolves are ‘sacred being[s]’, ‘balance the ecosystem’, are there ‘to guide the people’, and have a ‘prominent place in cultural practices’.⁶² Harm to wolves equates to ‘irreparable harm’ to Oneida societal structures which infringes on ‘religious and spiritual freedoms’.⁶³

The Tribes of the Great Plains also describe wolves as culturally and spiritually significant and an ‘integral’ part of the ‘emergence of our people’ on earth.⁶⁴ The Native Justice Coalition describes

⁵⁷ Brandy R Fogg, Nimachia Howe, and Raymond Pierotti, ‘Relationships Between Indigenous American Peoples and Wolves 1: Wolves as Teachers and Guides’ (2015) 35 *Journal of Ethnobiology* 262, 279.

⁵⁸ *idem*, 274, 273. In contrast to western notions of wolf domestication centering on fear and wolves eating scraps.

⁵⁹ Who call themselves Tsistsista, *idem*, 269.

⁶⁰ Dennis Papadopoulos, ‘Indigenizing Wild Animal Sovereignty’ (2022) 54 *Journal of Social Philosophy* 583, 588–9, citing to Shiri Pasternak, *Grounded Authority: The Algonquins of Barriere Lake against the State* (University of Minnesota Press 2017) 96; Winona LaDuke, ‘Traditional Ecological Knowledge and Environmental Futures’ (1994) 5 *Colorado Journal of International Environmental Law and Policy* 127, 127–8.

⁶¹ For example, the Cheyenne, Blackfeet, Sioux (Lakota), Arapaho, Brandy R Fogg, Nimachia Howe, and Raymond Pierotti, ‘Relationships Between Indigenous American Peoples and Wolves 1: Wolves as Teachers and Guides’ (2015) 35 *Journal of Ethnobiology* 262, 269, 272, 273, 277.

⁶² Oneida Nation, ‘Letter to the Principal Deputy Director of the United States Fish and Wildlife Service’ (23 July 2019) <www.globalindigenouscouncil.com/files/ugd/13fe3b_3b858fcd577f481686a5003e6b472eb8.pdf> accessed 23 January 2024, 1.

⁶³ *idem*, 2.

⁶⁴ Great Plains Tribal Chairmans Commission, ‘RE: The US Fish and Wildlife Service (FWS) Proposed Rule: Endangered and Threatened Wildlife and Plants; Removing the Gray Wolf (*Canis lupus*) from the List of Endangered and Threatened Wildlife’ (10 July 2019) <www.globalindigenouscouncil.com/files/ugd/13fe3b_cd4d1c382cf94e239b6e1c03f29324bd.pdf> accessed 23 January 2024.

that their community hold wolves in ‘reverence’, as guides and teachers in the ‘physical and spiritual’ realms, and as part of their ‘ceremonial lifeway’.⁶⁵

The Rocky Mountain Tribal Leaders Council acknowledges that, since the beginning of time, for many tribes, wolves are ‘foundational to their place upon and understanding of the earth and the stars’.⁶⁶

The Union of British Columbia Indian Chiefs holds wolves as ‘relative, revered as sacred’, ‘entrenched in our lifeways’, and culturally significant for the ‘spiritual integrity’ of tribal members.⁶⁷

The Great Lakes Indian Fish and Wildlife Commission sees wolves not as a ‘resource’, but as possessing ‘equal, or superior, capacity to human beings with respect to intelligence and agility’, and that, according to their creation story, ‘the Ojibwe and Ma’iingan would always be related’.⁶⁸

Following the controversial wolf hunt in Wisconsin in 2021, the Ojibwe further elaborated on their relationship with wolves, and their important role in tribal culture and wellbeing.⁶⁹ The wolf is central to the creation story of the Anishinaabe (which includes the Ojibwe), whereby ‘Ma’iingan was provided by the Creator to be a companion’ to humans.⁷⁰ The Anishinaabe see wolves as a relative, a brother, an ‘integral’ part of kinship, and through ‘stories, membership and culture, the wolf is woven into the spirit and identity of Anishinaabe people’.⁷¹ The slaughter of wolves left the Anishinaabe people ‘traumatized and outraged’ because it was an ‘assault on family members’ who were mourned.⁷² The Anishinaabe want a mutually-beneficial coexistence based on a ‘respectful and appreciate relationship’, where ‘Ma’iingan are allowed to determine their own range and population levels’.⁷³

The Wolf Treaty echoes a desire for mutually-respectful relations, recalling the many names of the

⁶⁵ Native Justice Coalition, ‘Public Comment: The US Fish and Wildlife Service (FWS) Proposed Rule: Endangered and Threatened Wildlife and Plants; Removing the Gray Wolf (*Canis lupus*) from the List of Endangered and Threatened Wildlife’ (11 July 2019)

<www.globalindigenouscouncil.com/files/ugd/13fe3b_9d49a03588614693a10129419b297c15.pdf> accessed 23 January 2024, 1.

⁶⁶ Rocky Mountain Tribal Leaders Council, ‘RE: The US Fish and Wildlife Service (FWS) Proposed Rule: Endangered and Threatened Wildlife and Plants; Removing the Gray Wolf (*Canis lupus*) from the List of Endangered and Threatened Wildlife’ (10 July 2019)

<www.globalindigenouscouncil.com/files/ugd/13fe3b_459a373ae3f34236bb7633063775f4dc.pdf> accessed 23 January 2024.

⁶⁷ Union of British Columbia Indian Chiefs, ‘RE: The US Fish and Wildlife Service (FWS) Proposed Rule: Endangered and Threatened Wildlife and Plants; Removing the Gray Wolf (*Canis lupus*) from the List of Endangered and Threatened Wildlife’ (10 July 2019)

<www.globalindigenouscouncil.com/files/ugd/13fe3b_a81d95dd8a514218b81794d48ae79591.pdf> accessed 24 January 2024, 1.

⁶⁸ Great Lakes Indian Fish and Wildlife Commission, ‘Public Comments to United States Fish & Wildlife Service’ (10 July 2019) <www.globalindigenouscouncil.com/files/ugd/13fe3b_0a62f765ce544ee9be736dc17b28310b.pdf> accessed 23 January 2024, 2.

⁶⁹ Jonathan H Gilbert et al, ‘Ojibwe Perspectives Toward Proper Wolf Stewardship and Wisconsin’s February 2021 Wolf Hunting Season’ (2022) 10 *Frontiers in Ecology and Evolution* 1, 1.

⁷⁰ *idem*, 2.

⁷¹ *idem*.

⁷² *idem*, 4.

⁷³ *idem*, 5.

wolf by Tribal Nations.⁷⁴ Wolves ‘brought knowledge and understanding of Mother Earth that is mirrored in the stars’ and they taught tribal people ‘how to survive’ and live in a ‘spiritual compact of reciprocity’.⁷⁵ Wolves are a ‘foundation’ of ‘traditional ways’ as a ‘teacher, a guardian, a clan guide – a relative’.⁷⁶ Respecting indigenous relationships with wolves means respecting ‘ecology, spirituality, human and animal relationships, and more’.⁷⁷ The Wolf Treaty also dispels a common narrative that wolves are inherently dangerous for humans by pointing out that dogs pose a greater risk to humans than wolves.⁷⁸ Elders recall times in nature with wolves who ‘never attack us’.⁷⁹

During a Minnesota Wolf Management Committee Meeting, Shirley Nordrum of the Anishinaabe shared how ‘wolves have a different meaning, they are spiritually important, give us many teachings about how we should live our lives, how we should live as family structures, so that’s a piece of who I am’.⁸⁰ She reinforced that she has never had any issues with, or fear of, wolves, even when she is outside in nature with her dogs. The results of a survey were presented at the meeting, which outlined community perceptions of wolves. However, only three categories of people were broken down — hunters, livestock farmers, and urban residents — which Shirley felt was biased because it prioritized understanding two special interest groups (hunters and livestock farmers) who have similar, and generally negative, views of wolves.⁸¹

Native Americans face well documented challenges when asserting their relations with wolves in a natural resource management paradigm that routinely separates ‘ethical, emotional, and spiritual knowledge’⁸² on the basis of objectivity.⁸³ The following sub-section turns to how Native American relationships with wolves expand upon, and address, a number of gaps, dualities, and stereotypes in western settler approaches to theories of animal rights.

3.2 *Expanding on Theories of Wild Animal Rights with Native American-Wolf Relations*

To expand upon existing theories of wild animals rights, tribal-wolf relations turn various aspects of conventional theories on their head. This is likely, in part, explained by oft-cited animals rights theories deriving from western, neo-liberal (white) men, with many Cartesian masculinities

⁷⁴ Wolf Treaty, 1, ‘Hó’nehe’, ‘Shó’nto’nga’, ‘Cheétxiilisee’, ‘Šuŋgmániu tháŋka’, ‘Ómahkapi’si’, ‘Mélemštye’, ‘Makoyi’, ‘Bia isa’, ‘Hooxei’, ‘Ruv’, ‘Tha:yö:nih’, ‘Okwaho’, ‘Othahyu-ní’, ‘Ma’iingan’, ‘Skiri’, ‘Nci?cn’, ‘Kwewu’, ‘Wahya’, ‘Himíin’, ‘Shin-ab’, ‘Tséena’.

⁷⁵ idem.

⁷⁶ idem, art II - Culture.

⁷⁷ idem, art III - Management Principles.

⁷⁸ idem, art VIII - Education. The Humane Society also aggregated data to show negligible impact of wolves on cattle and sheep, in The Humane Society of the United States, ‘Government Data Confirm that Wolves Have a Negligible Effect on U.S. Cattle & Sheep Industries’ (March 2019) <www.humanesociety.org/sites/default/files/docs/HSUS-Wolf-Livestock-6.Mar_.19Final.pdf> accessed 24 January 2024.

⁷⁹ Wolf Treaty, art XII — Conflict Reductions.

⁸⁰ DNR, Wolf Management Committee Meeting Wolf management plan advisory committee - Meeting 1, (June 2020) <https://www.youtube.com/watch?v=YkKvRrA_HT8> at 1:47:16 min accessed 26 January 2024.

⁸¹ idem, at 1:47. Other meeting participants from environmental and wildlife groups echoed similar concerns and questioned why groups like bird-watchers or trail-hikers were not interviewed and de-aggregated as categories, also because they would have more positive views of wolves and balance the results of the survey.

⁸² Bob Jickling and Paul C Paquet, ‘Wolf stories: Reflections on Science, Ethics, and Epistemology’ (2005) 27 *Environmental Ethics* 115, 125.

⁸³ idem. See also, Carroll Clint and Angelica Lawson, ‘New Media, Activism, and Indigenous Environmental Governance: Politics and the Minnesota-Wisconsin Wolf Hunt’ in Salma Monani and Joni Adamson (eds), *Ecocriticism and Indigenous Studies* (Routledge 2016) 137; Davinna Ohlson et al, ‘Advancing Indigenous Self-Determination Through Endangered Species Protection: Idaho Gray Wolf Recovery’ (2008) 11 *Environmental Science & Policy* 430, 431.

embedded within them.⁸⁴ On wolves, very few animal rights scholars have spent a considerable amount of time with, or contemplating, their specific individual preferences, life realities, and relational desires with humans in the way Native Americans have. When wolves are specifically referenced by notable scholars, a relationship based on separation and fear may be (unconsciously) re-enforced.⁸⁵

Native American approaches to wild animal rights go beyond judicially-orientated contributions. Such contributions often focus on animals sharing similar traits or qualities with humans, such as genetic similarities.⁸⁶ For example, Chimpanzees and Bonobos are generally considered the closest relatives of humans in western-liberal thought because of shared genetics and theories of evolution. For Native Americans, this is illogical because Great Apes are not an ancestor, but merely another family member.⁸⁷ Employed by Steven Wise, these ‘So-Like-Us’ approaches to animals rights, have also been critiqued with reference to issues of hierarchy.⁸⁸ This could be a relic of the inbuilt superiority complex inherited from Judeo-Christian conceptualizations of nature, which place humans as separate and at the top.⁸⁹ Other critiques include the embedded highly idealized standard of ‘humanness’, which does not reflect the reality of human diversity,⁹⁰ and stereotypical views about animals lacking ‘epistemic humility’.⁹¹ As more similarities between humans and animals become more widely recognized, such as democratic decision-making, cultural traditions, dialects and languages, the goal posts for sameness always change.⁹² Therefore, the question arises: who decides where to draw the line on sameness and by which criteria?⁹³ Angela Fernandez

⁸⁴ Martha C Nussbaum, ‘Working With and For Animals: Getting the Theoretical Framework Right’ (2017) 94 *Denver Law Review* 609, 610; Maneesha Deckha, ‘Toward a Postcolonial, Posthumanist Feminist Theory: Centralizing Race and Culture in Feminist Work on Nonhuman Animals’ (2012) 27 *Hypatia* 527, 529, 536; Eva Meijer and Bernice Bovenkerk, ‘Taking Animal Perspectives into Account in Animal Ethics’ in Bernice Bovenkerk and Jozef Keulartz (eds) *Animals in Our Midst: The Challenges of Co-existing with Animals in the Anthropocene* (Springer 2021) 49, 50.

⁸⁵ In a dialogue with Charlotte Blattner, Will Kymlicka specifically refers to wolves and how fear-based relations may be beneficial for humans citing concerns about wolves getting too friendly and preying on companion animals, in Youtube, ‘The 2022 Tom Regan Memorial Lecture: Charlotte Blattner, ‘Transitional Justice and Animal Rights’ (12 November 2022) <youtu.be/dMUnY5IKRjk> accessed 24 January 2024 at 1:00:19.

⁸⁶ This leads to an emphasis on protecting species like Great Apes, Elephants, or Marine Mammals. The NonHuman Rights Project by Steven Wise is an example of this in practice, see NhRP <www.nonhumanrights.org/> accessed 24 January 2024.

⁸⁷ ‘That might be your ancestor, but it’s not our ancestor. He’s a relative, but not an ancestor’, Floyd Red Crow Westerman (Kanghi Duta), Dakota, Great Sioux Nation in Youtube, ‘Indigenous Native American Prophecy (Elders Speak part 1) <youtu.be/g7cylfQtkDg> accessed 24 January 2024.

⁸⁸ Martha C Nussbaum, ‘Working With and For Animals: Getting the Theoretical Framework Right’ (2017) 94 *Denver Law Review* 609, Nussbaum, *supra* note 11 p. 610, & 613–4.

⁸⁹ *idem*.

⁹⁰ Maneesha Deckha, ‘Toward a Postcolonial, Posthumanist Feminist Theory: Centralizing Race and Culture in Feminist Work on Nonhuman Animals’ (2012) 27 *Hypatia* 527, 530; Zakiyyah Iman Jackson, ‘Animal: New Directions in the Theorization of Race and Posthumanism’ (2013) 39 *Feminist Studies* 669.

⁹¹ Eva Meijer and Bernice Bovenkerk, ‘Taking Animal Perspectives into Account in Animal Ethics’ in Bernice Bovenkerk and Jozef Keulartz (eds) *Animals in Our Midst: The Challenges of Co-existing with Animals in the Anthropocene* (Springer 2021) 49, 50; Eva Meijer, ‘Interspecies Democracies’ in Bernice Bovenkerk and Jozef Keulartz (eds), *Animal Ethics in the Age of Humans: Blurring Boundaries in Human-Animal Relationships* (Springer 2016) 53.

⁹² Eva Meijer and Bernice Bovenkerk, ‘Taking Animal Perspectives into Account in Animal Ethics’ in Bernice Bovenkerk and Jozef Keulartz (eds) *Animals in Our Midst: The Challenges of Co-existing with Animals in the Anthropocene* (Springer 2021) 49; Maneesha Deckha, *Animals as Legal Beings, Contesting Anthropocentric Legal Orders* (University of Toronto Press 2021) 129; Andrew Whiten, ‘The Burgeoning Reach of Animal Culture’ (2021) 372 *Science*; Antonino Pennisi and Laura Giallongo, ‘Animal Biopolitics: How Animals Vote’ (2018) 31 *International Journal for the Semiotics of Law* 491.

⁹³ Not surprisingly, there are a range of views on this issue with some scholars arguing that not all animals ‘need legal rights’ in Anne Peters, *Animals in International Law* (Brill 2021) 500.

acknowledges Indigenous world views deserve more respect in legal practice and argues for a quasi-property-personhood approach.⁹⁴ Her contribution is a direct response to the reality that efforts to extend the legal concept of personhood to animals have not yielded much success in achieving legal recognition, or rights, for wild animals in the United States.⁹⁵

Most notably advanced by Peter Singer, utilitarian approaches prioritize the welfare of animals by advocating for extending the same moral considerations to all sentient beings capable of suffering.⁹⁶ This shifts the focus to implementing broad strategies which minimize pain and discomfort.⁹⁷ These strategies have been extensively critiqued for their pleasure-focused, narrow, and reductionist qualities which do not ‘respect the diversity of animal lives’ and are ‘least common denominator’.⁹⁸ Singer and animal rights scholar Tom Regan apply rule-based, liberal, anti-species arguments, which post-human feminists critiqued for subordinating both women and animals alike in devaluing emotions, while privileging logic and moral valuation as the basis for judgement.⁹⁹ This style of argumentation remains influential among some animal rights scholars.¹⁰⁰ This approach maintains the silence of animals and indigenous peoples, while reflecting ‘a deeply gendered and imperial understanding of human relationships with animals’.¹⁰¹ Martha Nussbaum’s response is the ‘Capabilities Approach’, which emphasizes a dignified life for animals that enables flourishing based on compassion and a framework of justice.¹⁰² However, ‘species norms’ and hierarchies between humans and animals may have been reinforced, while oppressive institutions and structures have not been disrupted.¹⁰³

Reductionist posturing towards, and devaluation of, animals were also intensely critiqued by influential continental philosopher Jacques Derrida. Derrida considered the binary human/animal divide to be violently oppositional, while failing to acknowledge the ‘lively’¹⁰⁴ complexity and

⁹⁴ Angela Fernandez, ‘Not Quite Property, Not Quite Persons: A Quasi Approach For Nonhuman Animals’ (2019) 5 *Canadian Journal of Comparative and Contemporary Law* 185.

⁹⁵ Anne Peters, *Animals in International Law* (Brill 2021) 449–52. And perhaps unlikely to yield future success, in Maneesha Deckha, *Animals as Legal Beings, Contesting Anthropocentric Legal Orders* (University of Toronto Press 2021) 14.

⁹⁶ Most scholars include the utilitarian approach in a discussion on animal rights because it is so influential, see for example Dennis Vasilis Papadopoulos, ‘Politically Engaged Wild Animals’ (Dissertation, University of York, September 2021) <yorkspace.library.yorku.ca/server/api/core/bitstreams/9bc9aaab-a9fa-4a84-b7e7-bbee3e3d1cf0/content> accessed 23 January 2024, 2. Although most scholars agree that the welfarist approach is not actually advocating for animal rights. See Anne Peters, *Animals in International Law* (Brill 2021) 442.

⁹⁷ C.f. Peter Singer, *Animal Liberation: A New Ethics For Our Treatment Of Animals* (Random House 1975).

⁹⁸ Martha C Nussbaum, ‘Working With and For Animals: Getting the Theoretical Framework Right’ (2017) 94 *Denver Law Review* 609, 619–20.

⁹⁹ Maneesha Deckha, ‘Toward a Postcolonial, Posthumanist Feminist Theory: Centralizing Race and Culture in Feminist Work on Nonhuman Animals’ (2012) 27 *Hypatia* 527, 527.

¹⁰⁰ E.g. Saskia Stucki, ‘Towards a Theory of Legal Animal Rights: Simple and Fundamental Rights’ (2020) 40 *Oxford Journal of Legal Studies* 533; Visa Kurki, ‘Legal Personhood and Animal Rights’ (2021) 11 *Journal of Animal Ethics* 47.

¹⁰¹ Maneesha Deckha, ‘Toward a Postcolonial, Posthumanist Feminist Theory: Centralizing Race and Culture in Feminist Work on Nonhuman Animals’ (2012) 27 *Hypatia* 527, 537.

¹⁰² Jennifer Davidson, ‘Justice for All: The Shortcomings and Potentials for the Capabilities Approach for Protecting Animals’ (2018) 24 *Animal Law* 425, 439.

¹⁰³ Maneesha Deckha, *Animals as Legal Beings, Contesting Anthropocentric Legal Orders* (University of Toronto Press 2021) 10; Dennis Vasilis Papadopoulos, ‘Politically Engaged Wild Animals’ (Dissertation, University of York, September 2021) <yorkspace.library.yorku.ca/server/api/core/bitstreams/9bc9aaab-a9fa-4a84-b7e7-bbee3e3d1cf0/content> accessed 23 January 2024, 95.

¹⁰⁴ Carey Wolfe, “‘Life’ and “‘the Living,’” Law and Norm: A Foreword’ in Irus Braverman (ed), *Animals, Biopolitics, Law: Lively Legalities* (Routledge 2015) x, xx.

richness of animal experiences.¹⁰⁵ Toward more respectful relations, Derrida calls for new ways of thinking about, and speaking with, animals, to disrupt the many ‘conceptual cages’ inherited from philosophers like Aristotle and Descartes.¹⁰⁶ Rather than re-inventing the wheel, another option exists. Ancient and enduring indigenous relations, which include communication with animals (and are not merely theoretical, critical, or academic in character), offer guidance on practical ways for being in kinship with diverse beings.¹⁰⁷

The lack of attention to the inbuilt violence within the systems which produce harm to animals led to a ‘political turn’ in animal rights and increasing attention to decision-making structures.¹⁰⁸ An influential juncture in this space were the contributions of Sue Donaldson and Will Kymlicka. These scholars extended political categories to animals based on broad human-animal relationships, such as ‘citizen’ to animals living with and in close proximity to humans, while wild animals were extended ‘sovereignty’ with control over their own territories.¹⁰⁹ This body of work moved the conversation forward on what is possible for animals within political structures and power relations. This was notable because they argued that wild animals should, at least, have some say in shaping the rules and policies impacting them.¹¹⁰ Yet, critical animal scholars questioned whether these proposals went far enough in disrupting anthropocentric notions, while political philosophers pointed to the downfalls of group-level differentiation of animals.¹¹¹ Unhelpful colonial binaries and dualities also persist, such as a divide between wild and non-wild animals,¹¹² which assumes conflict-laden relations.¹¹³ There is also a failure to listen to ‘how wild animals already live with us’.¹¹⁴ Furthermore, mainstream ethical and political approaches to animal rights challenge existing institutions to consider animal interests and facilitate more than just interspecies relations. However, the larger frameworks (such as citizenship, sentience, etc.) are still left for humans to

¹⁰⁵ See ‘Animot’ in Matthew R Calarco, *Animal Studies: The Key Concepts* (Routledge 2020) 23; Cary Wolfe, *Animal Rites: American Culture, the Discourse Of Species, and Posthumanist Theory* (University of Chicago Press 2003) 66 and 74.

¹⁰⁶ idem. See also Jacques Derrida and David Wills, ‘The Animal that Therefore I Am (More To Follow)’ (2002) 28 *Critical Inquiry* 369, 383.

¹⁰⁷ Gavin Van Horn, Robin Wall Kimmerer, and John Hausdoerffer, *Kinship: Belonging in a World of Relations* (Center for Humans and Nature 2021). For an analysis of Indigenous approaches as a framework for judicial animal decision-making, see Maneesha Deckha, ‘Animalization and Dehumanization Concerns: Another Psychological Barrier to Animal Law Reform’ (2023) 2 *Psychology of Human-Animal Intergroup Relations* 1. See also Osager scholar, George E Tinker, ‘An American Indian Theological Response to Eco-Justice’ in Jace Weaver (ed) *Defending Mother Earth: Native American Perspectives on Environmental Justice* (Orbis Books 1996) 153 and Margaret Robinson, ‘Animal Personhood in Mi’kmaq Perspective’ (2014) 4 *Societies* 672.

¹⁰⁸ Tony Milligan, ‘The Political Turn in Animal Rights’ (2015) 1 *Politics and Animals* 6.

¹⁰⁹ Sue Donaldson and Will Kymlicka, *Zoopolis: A Political Theory of Animal Rights* (Oxford University Press 2011) 101 and 156.

¹¹⁰ idem, 101–3.

¹¹¹ Dinesh Wadiwel, *The War Against Animals* (Brill 2015) 101; Cochrane Alasdair, *Cosmozoopolis: The case against group-differentiated animal rights*, *Law, Ethics and Philosophy* (2013) 127-141.

¹¹² Although this paper also adopts this terminology with its embedded binaries, from a Native American perspective, the distinction between wild animal and domestic (or liminal) animals does not really exist. As a result, the use of the terminology caters to western expectations and categorizations, and does not necessarily reflect which animals a mutually-engaged-relational approach may apply to from an indigenous perspective.

¹¹³ Maneesha Deckha and Erin Pritchard, ‘Recasting Our Wild Neighbours: Contesting Legal Otherness in Urban Human-Animal Conflicts’ (2016) 49 *UBC Law Review* 161. See the absence of sharing in Dennis Vasilis Papadopoulos, ‘Politically Engaged Wild Animals’ (Dissertation, University of York, September 2021) <yorkspace.library.yorku.ca/server/api/core/bitstreams/9bc9aaab-a9fa-4a84-b7e7-bbee3e3d1cf0/content> accessed 23 January 2024, 95.

¹¹⁴ Dennis Vasilis Papadopoulos, ‘Politically Engaged Wild Animals’ (Dissertation, University of York, September 2021) <yorkspace.library.yorku.ca/server/api/core/bitstreams/9bc9aaab-a9fa-4a84-b7e7-bbee3e3d1cf0/content> accessed 23 January 2024, 11.

define, without any formal engagement or inquiry as to the wishes or needs of the animals in question.¹¹⁵ In short, these approaches are not mutually engaging.

From a Native American perspective, these theories fail to integrate foundational pillars of indigenous understanding, namely that everything is alive and that we are all related.¹¹⁶ George E. Tinker shares how the Lakota phrase, ‘Mitakuye Oyasin’, can be translated as ‘for all my relations’.¹¹⁷ Relations include immediate family, the whole tribe and nation, ‘and particularly all of the two-leggeds—the four-leggeds, the wingeds, and the living-moving things’.¹¹⁸ Margaret Robinson elaborates that Mi’kmaq understanding means that both humans and animals experience life ‘in the first person overcoming fears, having adventures, falling in love, raising families, vanquishing enemies, and having a relationship with Kisu’lk, the Creator’.¹¹⁹ Importantly, human responsibility is to respect all beings and ‘provide the conditions for animals to thrive’.¹²⁰

When violence, such as hunting, is necessary for survival, it must be ‘accompanied by an act of spiritual reciprocation intended to restore the balance of existence’.¹²¹ When animals are respected, they offer themselves as a sacrifice in the spirit of reciprocity. Each animal must be therefore thanked for their sacrifice, prayers are offered, and, like a ‘deceased friend’, the bones must be given a ‘respectful burial’ in the area where the animal lived.¹²² Deceased animals are seen as spiritually alive. If animals have been mistreated, they may retaliate, or at least warn others, who may refuse to sacrifice themselves in the future.¹²³ Importantly, animals must ‘not be exploited, over-hunted, or killed for sport’.¹²⁴ A challenging nuance (for some) is the way Native Americans draw a distinction between hunting for subsistence – when all parts of the animal must be used and nothing is wasted – and the strong condemnation by Tribal Nations of ‘trophy-hunting’ and ‘wildlife killing contests’.¹²⁵ This may be because Indigenous world views remain poorly understood, including the full extent of the respect they give to animals. In a review of animal rights critiques of hunting, Lauren Eichler and David Baumeister found that Native American needs and ‘perspectives on hunting appear to be almost totally absent from the scholarly conversations’.¹²⁶

¹¹⁵ Eva Meijer wants a co-shaping of relations in Eva Meijer, *When Animals Speak: Towards an Interspecies Democracy* (New York University Press 2019) 23. Anne Peters submits that animal interests, even when non-verbal, can be discerned by humans, in Anne Peters, *Animals in International Law* (Brill 2021) 582.

¹¹⁶ Margaret Robinson, ‘Animal Personhood in Mi’kmaq Perspective’ (2014) 4 *Societies* 672, 674.

¹¹⁷ George E Tinker, ‘An American Indian Theological Response to Eco-Justice’ in Jace Weaver (ed) *Defending Mother Earth: Native American Perspectives on Environmental Justice* (Orbis Books 1996) 153, 158.

¹¹⁸ *ibid.*

¹¹⁹ Margaret Robinson, ‘Animal Personhood in Mi’kmaq Perspective’ (2014) 4 *Societies* 672, 674.

¹²⁰ *ibid.*, 675.

¹²¹ George E Tinker, ‘An American Indian Theological Response to Eco-Justice’ in Jace Weaver (ed) *Defending Mother Earth: Native American Perspectives on Environmental Justice* (Orbis Books 1996) 153, 160.

¹²² Margaret Robinson, ‘Animal Personhood in Mi’kmaq Perspective’ (2014) 4 *Societies* 672, 675 and 680.

¹²³ *idem.*, 676.

¹²⁴ *idem.*

¹²⁵ Union of British Columbia Indian Chiefs, ‘RE: The US Fish and Wildlife Service (FWS) Proposed Rule: Endangered and Threatened Wildlife and Plants; Removing the Gray Wolf (*Canis lupus*) from the List of Endangered and Threatened Wildlife’ (10 July 2019)

<www.globalindigenescouncil.com/files/ugd/13fe3b_a81d95dd8a514218b81794d48ae79591.pdf> accessed 24 January 2024, 1.

¹²⁶ Lauren Eichler and David Baumeister, ‘Hunting For Justice: An Indigenous Critique of the North American Model of Wildlife Conservation’ (2018) *Environment and Society: Advances in Research* 75, 84.

Alternative rights frameworks, such as rights of nature, hold the potential to extend rights to wild animals.¹²⁷ While their origins are contested,¹²⁸ nature rights have been described as the ‘sister discourse’ of animals rights.¹²⁹ They may represent an opportunity for a closer intertwining with environmental law.¹³⁰ There are undoubtedly indigenous influences within rights of nature concepts globally.¹³¹ In the United States, local communities and Tribal Nations have mobilized to recognize rights of nature in over twenty local and tribal laws and declarations, including in the Wolf Treaty,¹³² for critically endangered Southern Resident Orcas,¹³³ and wild rice in treaty law.¹³⁴ However, some scholars are concerned that rights of nature may operate to constrain the full potential of indigenous lifeways.¹³⁵ This is especially true in settler colonial contexts where there is a high risk of ‘yet another instrument’ being imposed on First Nations peoples.¹³⁶ As anthropocentric and colonial norms dominate decision-making with respect to wild animals in the United States, rights of nature and Native American relationships with animals are yet to be fully respected.¹³⁷

There are overlapping conceptual and embodied similarities between, on the one hand, feminist-infused approaches and, on the other, Native American relations with animals as a basis for animal rights. Feminist legal theory has long critiqued atomistic and egotistical tendencies embedded in the liberal account of self, which do not reflect the lived experiences of women as in ‘more continuous’

¹²⁷ This already happened in Ecuador where rights of nature are constitutionally enshrined: *Mona Estrellita*, 253-20-JH, Quito (27 February 2022). For a brief overview, see Tom Sparks, Visa Anton Julius Kurki, and Saskia Stucki, ‘Animal Rights: Interconnections with Human Rights and the Environment’ (2020) 11 *Journal of Human Rights and the Environment* 150.

¹²⁸ Mihnea Tănăsescu, *Understanding the Rights of Nature: A Critical Introduction* (New Ecology 2022) <www.transcript-publishing.com/media/pdf/ed/d3/24/oa9783839454312JJ3njHne6oCpI.pdf> accessed 24 January 2024, 19–48.

¹²⁹ *idem*, 22.

¹³⁰ Historically this relationship has not always been easy, see Kirsten Stilt, ‘Rights of Nature, Rights of Animals’ (2021) 134 *Harvard Law Review Forum*, 276.

¹³¹ Rights of nature were initially integrated into legal systems with strong Indigenous communities, such as Bolivia and Ecuador to protect Mother Earth. See, United Nations Harmony with Nature, ‘Chronology’ <<http://www.harmonywithnatureun.org/chronology/>> accessed 24 January 2024, which cites to Constitution of the Republic of Ecuador (2008), art 71(1) and Law of the Rights of Mother Earth, Law 071 of the Plurinational State of Bolivia, 2010.

¹³² Wolf Treaty, Purpose and Objective.

¹³³ United Nations Harmony with Nature, ‘United States, Local Regulations’, <<http://www.harmonywithnatureun.org/rightsOfNature/>> accessed 24 January 2024. At the time of writing, a total of four cities (Port Townsend, Gig Harbor, Langley, Bainbridge) and two counties (Jefferson County and San Juan County) in Washington State have recognized the rights of Southern Resident Orcas. For a brief summary of Native Americans using rights of nature approaches, see Joshua C Gellers, *Rights for Robots: Artificial Intelligence, Animal and Environmental Law* (Routledge 2020) 106.

¹³⁴ 1855 Treaty Authority, ‘Resolution Establishing Rights of Manoomin: Resolution Number 2018-05’ (5 December 2018) <static1.squarespace.com/static/58a3c10abebafb5c4b3293ac/t/5c3cdbc940ec9ab9b9ffde9d/1547492298497/1855+Treaty+Authority+Resolution+for+2018-05+Rights+of+Manoomin+12-5-18.pdf> accessed 24 January 2024.

¹³⁵ Mihnea Tănăsescu, ‘Rights of Nature, Legal Personality, and Indigenous Philosophies’ (2020) 9 *Transnational Environmental Law* 429; Mihnea Tănăsescu, *Understanding the Rights of Nature: A Critical Introduction* (New Ecology 2022) <www.transcript-publishing.com/media/pdf/ed/d3/24/oa9783839454312JJ3njHne6oCpI.pdf> accessed 24 January 2024, 44.

¹³⁶ Rachel Garrett and Stephan Wood, ‘Rights of Nature Legislation for British Columbia: Issues and Options’ (2020) Centre for Law and the Environment Working Paper No 1/2020, 12.

¹³⁷ C.f. Kyle Whyte, ‘Settler Colonialism, Ecology, And Environmental Injustice’ (2018) 9 *Environment and Society* 125.

relation with others.¹³⁸ More specifically, Lori Gruen recognizes our empathetic entanglement with animals.¹³⁹ Maneesha Deckha emphasizes our shared relationality, vulnerability, and beingness; thus, inviting a listening to animals for animal-friendly decision-making.¹⁴⁰ Josephine Donovan wants to move from care toward dialogue.¹⁴¹ Lisa Jean Moore and Mary Kosut explore different ways of knowing other beings through all of our senses.¹⁴² However, Native American scholars have questioned whether feminist critiques remain grounded in a hierarchical paradigm which does not see animals as relatives.¹⁴³ Yet, some shared themes emerge of inter-connectedness, the possibility of mutually-engaged relations, and an emphasis on relationality as a way of knowing each other which goes beyond rationality. These are perhaps explained by a more balanced valuing of feminine kinship within indigenous cultures compared to the saturation of patriarchal norms in western culture.¹⁴⁴ Although western feminist animal scholars use different linguistic terminology, their contributions arise from concerns similar to those of Native Americans (and other historically oppressed groups), including an understanding of what it feels like to be silenced, ignored, and de-valued.¹⁴⁵

Indigenous relational dynamics with wild animals go beyond the materialistic dimension. They are rooted in a much deeper and holistic ontology which recognizes, and has reverence for, the interconnectedness of all life.¹⁴⁶ Ben Nuvamsa of the Hopi Bear Clan explains: ‘We were told by our Creator to take care of Mother Earth. Our culture is holistic. Everything is connected’.¹⁴⁷ This integrated relationality guides interactions with (animal) brothers and sisters, which ‘enhance and preserve’ ecosystems,¹⁴⁸ while also recognizing and valuing the spiritual essence of all entities, which may pass into other dimensions, and lifetimes.¹⁴⁹ Furthermore, each animal has a protector spirit, which may punish those who abuse, or do not respect, animals.¹⁵⁰ It is beyond the scope of

¹³⁸ Robin West, ‘Feminism, Critical Social Theory and Law’ (1989) 1989 *University of Chicago Legal Forum* 59, 85–6.

¹³⁹ Lori Gruen, *Entangled Empathy: An Alternative Ethic for Our Relationships With Animals* (Lantern Books 2015).

¹⁴⁰ Maneesha Deckha, *Animals as Legal Beings, Contesting Anthropocentric Legal Orders* (University of Toronto Press 2021) 122, 171.

¹⁴¹ Josephine Donovan, ‘Feminism and the Treatment of Animals: From Care to Dialogue’ (2006) 31 *Journal of Women in Culture and Society* 305.

¹⁴² Lisa Jean Moore and Mary Kosut, ‘Among The Colony: Ethnographic Fieldwork, Urban Bees And Intra-Species Mindfulness’ (2014) 15 *Ethnography* 516.

¹⁴³ Talk by George E Tinker at Yale Divinity School on 17 April 2018, Youtube, ‘Individual Salvation vs. Cosmic Balance: An American Indian Perspective’ (30 April 2018) <youtu.be/2PtUcb4ImvQ> accessed 24 January 2024, at 15:20–24:22.

¹⁴⁴ Patricia Dudgeon and Abigail Bray, ‘Indigenous Relationality: Women, Kinship And The Law’ (2019) 3 *Genealogy* 23.

¹⁴⁵ Zakiyyah Iman Jackson, ‘Animal: New Directions in the Theorization of Race and Posthumanism’ (2013) 39 *Feminist Studies* 669, 681; Maneesha Deckha, ‘Toward a Postcolonial, Posthumanist Feminist Theory: Centralizing Race and Culture in Feminist Work on Nonhuman Animals’ (2012) 27 *Hypatia* 527.

¹⁴⁶ Enrique Salmón, ‘Kincentric Ecology: Indigenous Perceptions of the Human–Nature Relationship’ (2000) 10 *Ecological Applications* 1327; Margaret Robinson, ‘Animal Personhood in Mi’kmaq Perspective’ (2014) 4 *Societies* 672; Talk by George E Tinker at Yale Divinity School on 17 April 2018, Youtube, ‘Individual Salvation vs. Cosmic Balance: An American Indian Perspective’ (30 April 2018) <youtu.be/2PtUcb4ImvQ> accessed 24 January 2024.

¹⁴⁷ Chairman Ben Nuvamsa, Hopi Bear Clan Elder and former Chairman of the Hopi Tribe in unnamed video on Global Indigenous Council website <www.globalindigenouscouncil.com/wolf-treaty> accessed 24 January 2024, at 0:58.

¹⁴⁸ Enrique Salmón, ‘Kincentric Ecology: Indigenous Perceptions of the Human–Nature Relationship’ (2000) 10 *Ecological Applications* 1327.

¹⁴⁹ Courtney Carothers et al, ‘Indigenous Peoples and Salmon Stewardship: A Critical Relationship’ (2021) 26 *Ecology & Society* 15, 16.

¹⁵⁰ Brandy R Fogg, Nimachia Howe, and Raymond Pierotti, ‘Relationships Between Indigenous American Peoples and Wolves 1: Wolves as Teachers and Guides’ (2015) 35 *Journal of Ethnobiology* 262, 274.

this article to fully delve into all aspects of tribal multi-being entanglements which span thousands of years and multiple dimensions.¹⁵¹ Of note is how this way of being: rooted in a indivisibility, a broader cosmology, a valuing of knowledge and experiences arising from reciprocal relations, is why harm to wolves means harm to Native Americans.¹⁵² The film *Family* explains simply: wolves ‘became a part of us, they are a part of you’.¹⁵³

4. Toward Mutually-Engaged Wolf-Human Relations

In colonial settler narratives, animals are passive, to be extracted and dominated. But for Native Americans, animals are part of a continuity of relations, who ‘share the same breath’,¹⁵⁴ are ‘friends and kin who, when engaged with properly and respectfully’ reciprocate the relationship.¹⁵⁵ Wolves, and all animals, ‘are seen as full persons with rights and responsibilities’.¹⁵⁶ Respecting each wolf is synonymous with respecting Native American relations with all wolves.¹⁵⁷ It is clear that Tribal Nations want the life of individual wolves to be valued, appreciated, and respected.¹⁵⁸ For wolf-families to be free to determine their own life path.¹⁵⁹ To empower wolves to flourish –

¹⁵¹ Kimberley Greeson, ‘Pili‘Oha/Kinship: (Re)Imagining Perceptions of Nature and More-Than-Human Relationality’ (2019) 10 *Imaginations: Journal of Cross-Cultural Image Studies* 375.

¹⁵² For example, with regard to the Native American relationship with the river, it’s not just about respecting the river, it’s about a mutual giving without taking as an act of love, in the same way the river offers her abundance without taking anything in return, in Dennis Vasilis Papadopoulos, ‘Politically Engaged Wild Animals’ (Dissertation, University of York, September 2021) <yorkspace.library.yorku.ca/server/api/core/bitstreams/9bc9aaab-a9fa-4a84-b7e7-bbee3e3d1cf0/content> accessed 23 January 2024, 103.

¹⁵³ YouTube, ‘Family’ (7 July 2021) Global Indigenous Council <youtu.be/8ZWmfMK6bfc> accessed 23 January 2024, at 0:33.

¹⁵⁴ Enrique Salmón, ‘Kincentric Ecology: Indigenous Perceptions of the Human–Nature Relationship’ (2000) 10 *Ecological Applications* 1327, 1328.

¹⁵⁵ Lauren Eichler and David Baumeister, ‘Hunting For Justice: An Indigenous Critique of the North American Model of Wildlife Conservation’ (2018) *Environment and Society: Advances in Research* 75, 80, referencing Lakota scholar Vine Deloria Jr.

¹⁵⁶ *idem*, 86.

¹⁵⁷ Oneida Nation, ‘Letter to the Principal Deputy Director of the United States Fish and Wildlife Service’ (23 July 2019) <www.globalindigenouscouncil.com/files/ugd/13fe3b_3b858fcd577f481686a5003e6b472eb8.pdf> accessed 23 January 2024; Native Justice Coalition, ‘Public Comment: The US Fish and Wildlife Service (FWS) Proposed Rule: Endangered and Threatened Wildlife and Plants; Removing the Gray Wolf (*Canis lupus*) from the List of Endangered and Threatened Wildlife’ (11 July 2019) <www.globalindigenouscouncil.com/files/ugd/13fe3b_9d49a03588614693a10129419b297c15.pdf> accessed 23 January 2024; Union of British Columbia Indian Chiefs, ‘RE: The US Fish and Wildlife Service (FWS) Proposed Rule: Endangered and Threatened Wildlife and Plants; Removing the Gray Wolf (*Canis lupus*) from the List of Endangered and Threatened Wildlife’ (10 July 2019) <www.globalindigenouscouncil.com/files/ugd/13fe3b_a81d95dd8a514218b81794d48ae79591.pdf> accessed 24 January 2024; YouTube, ‘Family’ (7 July 2021) Global Indigenous Council <youtu.be/8ZWmfMK6bfc> accessed 23 January 2024; Jonathan H Gilbert et al, ‘Ojibwe Perspectives Toward Proper Wolf Stewardship and Wisconsin’s February 2021 Wolf Hunting Season’ (2022) 10 *Frontiers in Ecology and Evolution* 1, 4.

¹⁵⁸ Rocky Mountain Tribal Leaders Council, ‘RE: The US Fish and Wildlife Service (FWS) Proposed Rule: Endangered and Threatened Wildlife and Plants; Removing the Gray Wolf (*Canis lupus*) from the List of Endangered and Threatened Wildlife’ (10 July 2019) <www.globalindigenouscouncil.com/files/ugd/13fe3b_459a373ae3f34236bb7633063775f4dc.pdf> accessed 23 January 2024; Great Plains Tribal Chairmans Commission, ‘RE: The US Fish and Wildlife Service (FWS) Proposed Rule: Endangered and Threatened Wildlife and Plants; Removing the Gray Wolf (*Canis lupus*) from the List of Endangered and Threatened Wildlife’ (10 July 2019) <www.globalindigenouscouncil.com/files/ugd/13fe3b_cd4d1c382cf94e239b6e1c03f29324bd.pdf> accessed 23 January 2024.

¹⁵⁹ Great Lakes Indian Fish and Wildlife Commission, ‘Public Comments to United States Fish & Wildlife Service’ (10 July 2019) <www.globalindigenouscouncil.com/files/ugd/13fe3b_0a62f765ce544ee9be736dc17b28310b.pdf> accessed 23 January 2024.

where, in the way, and in the family sizes that they see fit.¹⁶⁰ In short, Tribal Nations are not deciding for wolves, but are being guided by wolves and living in harmony with wolves. Listening to, and learning from, wolves in reciprocal exchanges are foundational aspects of mutually-engaged wolf-human relations. This involves inviting wolf perspectives and relational desires into decision-making processes ‘rather than assuming what they are’.¹⁶¹

The ‘inverted triangle’ embedded within Native American animal-human relations means that ideas of human superiority are less prominent within this world view and notions of anthropocentrism may not need to be so strongly disrupted.¹⁶² By seeing wolves as equitable partners, this more humble approach to wild animal rights, if adopted, would be more likely to reduce the risk of domination dynamics making their way into human-saturated institutions and decision-making processes. This is the main concern raised by many feminist, critical scholars, and progressive political philosophers in defining governance structures for animals.¹⁶³ This reverence and care for wolves, as family members, was operationalized by the Ojibwe when they asserted their hunting rights to protect, not hunt, their treaty allocation of wolves – even though their efforts came to nothing.¹⁶⁴

Legal and political systems in the United States have been built around a very different relationship with wolves, which does not respect wolves or Native American people.¹⁶⁵ Native Americans have politically engaged to show United States’ governments and local communities what wolves mean to them and the relations they have, and want to continue to have, with them. Yet, these interventions remain somewhat on the periphery within a natural resource paradigm premised on claims of objectivity and within contemporary animals rights discourse. The outline of theories of

¹⁶⁰ Jonathan H Gilbert et al, ‘Ojibwe Perspectives Toward Proper Wolf Stewardship and Wisconsin’s February 2021 Wolf Hunting Season’ (2022) 10 *Frontiers in Ecology and Evolution* 1, 1.

¹⁶¹ Maneesha Deckha, *Animals as Legal Beings, Contesting Anthropocentric Legal Orders* (University of Toronto Press 2021) 172; Brandy R Fogg, Nimachia Howe, and Raymond Pierotti, ‘Relationships Between Indigenous American Peoples and Wolves 1: Wolves as Teachers and Guides’ (2015) 35 *Journal of Ethnobiology* 262, 5; Elder Joe Copper Jack’s Land and Peoples relationship model includes animal and plant stakeholders in decision-making processes and has been used in natural resource decision-making institutions in Yukon, British Columbia, Northwest Territories (Canada) and Alaska (USA United States), , Keynote Address presented at the International Multi-species Research Methods Symposium (10 May 2023) <<https://drive.google.com/file/d/1CIBOpARNi5Yp7b87mvkAKeMyniZcyTU-/view>> accessed 26 January 2023; Oren Lyons, of the Iroquois Confederacy, offered the service of the Haudenosaunee to be the international voice of animals in decision-making at the United Nations in 1977. See: John Mohawk, “‘Animal Nations Right to Survive’”, (1988) 2:3 *Daybreak* <p. 2, at: <http://blogs.nwic.edu/briansblog/files/2015/04/Animal-Nations-Right-to-Survive.pdf>> accessed 24 January 2024, 2,

¹⁶² Nolan Yellow Kidney, Blackfeet Sun Dance Leader, unnamed video on Global Indigenous Council website at 1:44 min, <www.globalindigenouscouncil.com/wolf-treaty> accessed 23 January 2024; Anna Grear, ‘Deconstructing Anthropos: A Critical Legal Reflection On “Anthropocentric” Law And Anthropocene “Humanity”’ (2015) 26 *Law and Critique* 225.

¹⁶³ Maneesha Deckha, ‘Critical Animal Studies and Animal Law’ (2012) 18 *Animal Law* 207; Eva Meijer and Bernice Bovenkerk, ‘Taking Animal Perspectives into Account in Animal Ethics’ in Bernice Bovenkerk and Jozef Keulartz (eds) *Animals in Our Midst: The Challenges of Co-existing with Animals in the Anthropocene* (Springer 2021) 49; Dinesh Wadiwel, *The War Against Animals* (Brill 2015); Will Kymlicka, ‘Human Rights Without Human Supremacism’ (2018) 48 *Canadian Journal of Philosophy* 763.

¹⁶⁴ Jonathan H Gilbert et al, ‘Ojibwe Perspectives Toward Proper Wolf Stewardship and Wisconsin’s February 2021 Wolf Hunting Season’ (2022) 10 *Frontiers in Ecology and Evolution* 1. See also Leah Campbell, ‘A Fight Over Wolves Pits Facts Against Feelings in Wisconsin’ *UNDARK* (6 June 2022) <undark.org/2022/06/06/a-fight-over-wolves-pits-facts-against-feelings-in-wisconsin/> accessed on 23 January 2024; *Red Cliff Band of Lake Superior Chippewa Indians of Wisconsin v. Preston Cole*, Case 3:21-cv-00597 <earthjustice.org/sites/default/files/files/wisc-case.pdf> accessed 23 January 2024, dismissed without prejudice on 26 April 2022.

¹⁶⁵ Walter R Echo-Hawk, *In the Courts of the Conqueror: The 10 Worst Indian Law Cases Ever Decided* (Fulcrum Publishing 2010) 560.

animal rights shows that Native American lifeways have not been fully listened to, or reflected in, contemporary, utilitarian, ‘So-Like-Us’, or political philosophy approaches. While there are some conceptual overlaps and continuities with feminist, critical animal studies, and nature rights approaches, deeply listening to Native American relationships with animals as a basis for conceptualizing and operationalizing wild animal rights remains far away from a mainstream practice in existing structures and discourse.

This contribution aimed to fill this gap. It did so by listening to and respecting tribal-wolf relations which are inclusive of wolf desires and knowledge arising from mutually-engaging exchanges. The environmental and cultural rights of Native Americans are synonymous with the rights of wolves and other wild animals. This understanding, and practice of listening, is equally important for animal and environmental rights scholars, educators, lawyers, and wildlife defenders who have not always had an inclusive relationship with indigenous people. Tribal relationality and equitable partnerships with wolves challenge deeply held anthropocentric and stereotypical notions about animals which are embedded in colonial settler thought, education, and doctrine according to which wolves are inferior to humans, disinterested in shaping society, or unable to contribute in a meaningful way. As wolf policies and laws continue to evolve in the United States, amplifying tribal-wolf relations serves to overturn colonial and destructive norms, while contributing to the momentous task of rectifying the many long-standing and deeply ingrained injustices which persist.¹⁶⁶

Full and equal participation of Native Americans at all levels of wolf-decision-making would begin to repair ‘fragmented relations among humans and their more-than-human counterparts’.¹⁶⁷ This degree of inclusion would be a radical shift in practice from what is occurring today. Yet, it holds the potential to yield beneficial outcomes, both for the well-being of wolves and for Native Americans. As the Ojibwe say: ‘what happens to the wolf, happens to us’.¹⁶⁸

¹⁶⁶ And can help with reconciliation efforts, in Maneesha Deckha, ‘Unsettling Anthropocentric Legal Systems: Reconciliation, Indigenous Laws, and Animal Personhood’ (2020) 41 *Journal of Intercultural Studies* 77.

¹⁶⁷ Angela McGinnis et al, ‘Strengthening Animal-Human Relationships as a Doorway to Indigenous Holistic Wellness’ (2019) 11 *Ecopsychology* 162; Davinna Ohlson et al, ‘Advancing Indigenous Self-Determination Through Endangered Species Protection: Idaho Gray Wolf Recovery’ (2008) 11 *Environmental Science & Policy* 430, 431; George Tinker, *Spirit and resistance: Political theology and American Indian liberation* (Fortress Press 2004) 5.

¹⁶⁸ The ‘Ma’iingan and Ojibwe have lived parallel histories, suffering from the effects of colonization, the decimation of wolf populations and decline of tribal culture’, see Jonathan H Gilbert, et al, *Ojibwe Perspectives Toward Proper Wolf Stewardship and Wisconsin’s February 2021 Wolf Hunting Season* (2022) 10 *Frontiers in Ecology and Evolution* 1.