



March 28, 2018

Honourable Pauline Frost, Minister of Environment  
Department of Environment  
Government of Yukon  
Box 2703 (V-3A)  
Whitehorse, Yukon

Minister Frost,

**Re: Regulation Change to Increase Moose and Caribou Seal Fees**

This letter is a response to correspondence dated March 16, 2018 regarding the regulation to increase moose and caribou seal fees from \$5 to \$10, originally proposed by the Department of Environment in June 2015 through the Yukon *Wildlife Act* regulation change process.

In the March 16 letter it was stated that the “regulation change to increase the seal fees is moving forward”. However, it is further indicated that while the seal fee for moose and caribou will increase from \$5 to \$10, the funds generated from this increase will not go to Conservation (meaning to projects funded through the Enhancement Trust) as intended in the original regulation change but will in fact go to Yukon Government general revenue.

The regulation change was specifically proposed by the Department and recommended by the Board to support projects to protect and enhance moose and caribou populations through the Enhancement Trust process. The regulation change engagement process carried out in 2015 made the intent and value of the fee increase clear and recommended it to the Minister based on that intent. To deviate from the original intent now, with little notice before the decision is likely to be implemented for this hunting season (April 1, 2018), brings the integrity of the regulation change process in to question.

There are three points the Board would like to emphasize with regards to the outcome of this regulation change:

- The Board understands the financial difficulties currently facing the Yukon Government, and Yukon Government has the right to increase fees and generate revenue in whatever way deemed appropriate. However, government financing is not the business of the Board, and it should not be interpreted that the Board supports this regulation change

to increase Yukon Government finances as it is now presented, instead of to fund projects to enhance and protect moose and caribou populations.

- The decision to allocate the funds generated from the fee increase to general revenue is a departure from the work that has been done in good faith with the Department, including drafting a contribution agreement outlining how the funds would be allocated to the Enhancement Trust. With this change, the integrity of the entire regulation change process is called in to question.
- The organizations and public who supported this regulation change in its original form, with the additional funds being allocated to projects that protect and enhance moose and caribou populations, must be informed that what they supported has now been changed and that this change is not reflective of any decision or recommendation made by the Board.

We hope that this clarifies the Board's position with regards to this regulation change. Given that the intent of the original recommendation has been lost, the Board should no longer be associated with the decision to increase the seal fee for moose and caribou.

Sincerely,



Frank Thomas

Chair, Yukon Fish and Wildlife Management Board