
**YUKON FISH AND WILDLIFE
MANAGEMENT BOARD**



January 7, 2020

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

Minister Frost,

Re: 2019 Recommendations on Yukon *Wildlife Act* Proposed Regulation Changes

According to the joint process established by the Yukon Fish and Wildlife Management Board (hereafter 'the Board') and the Government of Yukon, the Board makes provisions for public involvement in the review of proposed regulation changes pertaining to the Yukon *Wildlife Act*. The Board recently completed the public review of 14 substantive regulation changes proposed in 2019. This public review was conducted over a 31-day timeframe, and closed on December 9th, 2019.

During the review period, the Board received direct input from members of the Yukon public, First Nations, Renewable Resources Councils, as well as a number of other interested parties and stakeholders, including: the Yukon Fish and Game Association, , the Yukon Outfitters Association (and individual outfitters), the Yukon Backcountry Hunters and Anglers, as well as Yukon's chapter of the Wild Sheep Foundation. The Board also hosted a number of public meetings, both in the communities and in Whitehorse, and received written correspondence and heard from over five hundred and fifty responses through our online survey. All of this feedback and information has been carefully considered in the development of the Board's recommendations.

After listening to concerns raised by many different parties and stakeholders, it is apparent to the Board that more time for public engagement is required before



the Board can make recommendations on the first three proposals. These proposals all relate to moose management, adaptive management, and are all proposals submitted by the Fish and Wildlife Branch of Environment Yukon.

The Board understands that changing our current harvest framework to an adaptive approach, which aims to enable Ministerial discretion in the management of moose harvest in Yukon, is a substantial change. Furthermore, the Board acknowledges that these proposals intend to address, and elevate, moose management issues in the territory by creating a framework which facilitates a more timely and direct response to conservation concerns, however the language used to advance the adaptive proposal was too vague, and the examples utilized in the proposals themselves were overwhelmingly not well received. In summation, it is apparent to the Board that a majority of members from the Yukon public did not fully understand the nature of these proposals.

In order to adequately address these concerns, the Board has elected to extend the public review period for proposals one, two and three [*only*], by 90 days. During which time, the Board will re-engage with the department and develop a clearer approach. WE will then engage the Yukon public, First Nations, associations, Councils, and any other interested stakeholders. The Board, together with Fish and Wildlife Branch, have committed to creating a clearer and more strategic approach to communicating these regulations to facilitate and improve the public's understanding of adaptive management, and the need for area specific management in the Sifton/Miner's Range and on the South Canol.

Our recommendations for the remaining 11 proposals (4-14) are as follows:

Proposal 4. Mayo MMU Moose Harvest Management

Mayo Renewable Resources Council proposed to limit licensed harvest of moose in the Mayo Moose Management Unit (MMU) to a maximum number, per season, through a threshold hunt regulation. The threshold will be set to reflect current harvest levels and will properly address the declining trend of bull moose in the area.



This proposal would also see a change in the season start date from August 1st to September 1st, in order to curb the early-season influx of hunters coming to the Mayo area from other communities. This proposal would also result in the requirement of harvest reporting within 72 hours, to avoid over-shooting the threshold before the season closes.

Recommendations:

- 1.1** The Board recommends the Minister **accept** the proposal to change the Mayo MMU to a threshold hunt, which includes 13 available bull moose to be available for licensed harvest, with a delayed start date of September 1st.
- 1.2** The Board further recommend the Department and the Mayo Renewable Resources Counsel monitor the population of moose in this MMU closely to ensure that population fluctuations are matched with appropriate harvest quota should the population either rise or fall in the foreseeable future.

Rationale:

The public response to this proposal was similar to other three adaptive moose management proposals, with the majority of respondents not in favour of the proposal, as it is currently written. The Board, however, understands the amount of work that has been done over the past 10 years in the Mayo area, by the RRC and the regional biologist, to bring this proposal to its current state.

This is a well thought-out, community led proposal that resulted from countless community engagements and support from residents of the Traditional Territory. The Board acknowledges the extensive local, traditional, and scientific knowledge that has gone into this submission. Furthermore, this measure would adequately provide the opportunity for local hunters to have some degree of preference, in such a way that is both legal and favourable to the Board.

It should also be noted that the Board supports the RRC's desire to begin the moose hunting season on September 1st, rather than on August 1st to avoid an early season rush. The Board disagrees that opening the hunt on August 1st (which is customary across the Yukon) will increase the chances of potential meat



wastage which was implied by the RRC. Many hunters take moose, caribou, and other large ungulates in August, this is not a cause of meat waste, and in fact moose are generally considered fatter and better eating in August. Notwithstanding, the proposal should go forth as proposed.

Proposal 5. Enable Sustainable Harvest Management of Hart River Caribou Herd

Environment Yukon proposed to enable the sustainable management of the Hart River caribou population. This provision would allow the Minister to modify harvest regulations for specific areas during the hunting season, based on current information instead of definitive non-discretionary regulations that provide no flexibility or adjustment abilities. This measure would utilize either a threshold or a permit hunt, which would provide managers an opportunity to continue providing harvest opportunities, without over harvesting or creating crowding issues.

The proposal was submitted because of increased harvest rates over the past decade, now nearing sustainable limits based on the most recent population estimates. The herd is also subject to incidental harvest by hunters targeting Porcupine caribou.

Recommendations:

2.1 The Board recommends the Minister **accepts** the proposal as it is written.

2.2 The Board recommends the Minister utilize a **threshold hunt** for Hart River caribou, to ensure all licensed hunters still have an opportunity to harvest a bull from this herd, rather than making this a Permit Hunt Authorization, which generally favour higher population centers like Whitehorse.

Rationale:

During the public review process, this proposal steadily grew in favour of acceptance. With some clarification required to confirm this was not a prohibiting measure. Many Councils, and members of the Yukon public came to accept this



proposal over time once it became clear this was an enabling proposal. Some respondents to the online survey felt this proposal was lacking in evidence, however, the Board recognizes the validity of the scientific information that is available regarding sustainable limits for this herd.

The data presented to the Board by Environment Yukon clearly indicates that Hart River Caribou experience the highest licensed harvest of any mountain caribou herd in the Yukon, likely owing to their relative accessibility. As such, the herd is consistently nearing the limit of sustainable harvest. The department demonstrated clearly the need for this proposal as a proactive measure to ensure harvest of Hart River Caribou, and ensure conservation for future generations.

Proposal 6. Nelchina Caribou Herd Adaptive Harvest Management

Environment Yukon proposed to reopen a hunting opportunity that has been closed since the 1990's, which enables a sustainable harvest of the Nelchina caribou herd. This herd periodically occupies parts of Game Management Subzones (504, 505, and the north end of 506). This proposal aims to achieved this by adding these Game Management Sub-zones to Schedules B and C of the *Wildlife Act*, and enable either a threshold, an open season (with season manipulation), or a Permit Hunt Authorization.

The Board acknowledges that this proposal is the Department's response to repeated appeals by Alaskan wildlife managers, requesting Yukon's help in maintaining this herd at what they deem to be a sustainable level of between 35 and 40-thousand animals. The herd is currently over 50,000 animals creating some concern that the herd could over-graze its available range and the population could then suddenly crash.

Recommendations:

3.1 The Board recommends the Minister **accepts** the proposal as it is written.



3.2 The Board recommends careful Ministerial discretion for this herd, owing to the fact that it only inconsistently occupies parts of the Yukon. This means the Minister may want to utilize a different provision depending on the herd size, strength and location for any given year whereby any harvest on the Yukon-side is deemed possible by managers and regional biologists (**i.e. either a threshold hunt, open season or Permit Hunt Authorization**).

Rationale:

During the public review process, this proposal received an overwhelming amount of support from respondents. Of all proposals put forward for public review, this proposal garnered the strongest favour amongst interested parties and stakeholders that responded to our review.

A number of associations and councils flagged this conservation success-story as a potential model that may be considered for the future management of other herds, including the 40-mile caribou herd.

The Board believes this renewed opportunity will also help to alleviate some harvest pressure from other caribou herds, so long as it is enforced with careful consideration as to the proximity and likelihood of incidental harvest on Chisana caribou.

Proposal 7. Enable Adaptive Management of Roadside Hunting for Grizzly Bear

Environment Yukon proposed this change to the current harvest framework of grizzly bears. Currently, hunting of grizzly bears is permitted throughout the territory, however, there has been longstanding public debate over the practice.

This proposal is intended to enable local prohibitions while ensuring that if a roadside closure is *proposed and supported by the community*, that the prohibitions be enforced and enacted in a standardized manner.



The Board acknowledges that the issue of roadside hunting remains divisive, as regional differences with some communities in support of closures - while others are in direct opposition to any closures at this time. The Board acknowledges these important regional and cultural differences on the matter and believes that by enabling an adaptive framework, which would support local sentiment and practices, this proposed change will serve to mitigate the intense polarity around this issue.

Recommendations:

4.1 The Board recommends the Minister **accepts** the proposal as it is written.

4.2 The Board recommends the Minister utilizes a **standard distance of 100 meters** from the centerline of a road, beyond which hunting of grizzlies will be permitted. The Board believes this will assist in the enforcement of this regulation and will also create some consistency for hunters in areas where harvest along the roadside may be limited.

Rationale:

During the public review process, the responses garnered around the adaptive management of roadside hunting for grizzly bears mirrored the results of other surveys previously conducted on this topic. This is a highly divisive topic, which commonly sees polls split almost exactly 50/50 (in support and against). The Board would like to acknowledge that while some communities in Yukon support the roadside hunting of grizzly bears, others see the practice as undesirable and adamantly oppose it.

A number of councils and associations expressed moderate disapproval over the proposal, mainly owing to the fact that it was too vague in its scope and it was unclear as to how the process would actually work. The Board also received feedback with concerns over the definitions of what a 'community led' proposal would entail, as many Yukoners live outside of rural communities and may, therefore, be subject to a different interpretation of this wording. The Board also received feedback from councils and outfitters with concerns over this change in management eventually becoming a territory-wide regulation.



Another concern, which was common among respondents to the Board’s online survey, raised the issue of this practice encouraging the habituation of bears to roadside corridors. Those respondents cited the fact that this practice may increase the potential for human bear-conflict and interaction, as well as motor vehicle collisions.

The Board acknowledges that grizzly bears are important to the health of many ecosystems in Yukon, while also providing unique and valuable opportunities for non-consumptive use (such as tourism and wildlife viewing).

The Board understands this is an issue that varies drastically from community to community, therefore, the Board would like to emphasize that the implementation of such prohibitions *must first be supported and proposed at the local level*.

The Board recommends the Minister accepts the proposal, owing to the fact that this is supposed to be a community-led endeavor, which empowers community-based regulations that should reflect local, traditional and scientific knowledge. This regulation also directly aligns with the newly released Conservation Plan for Grizzly Bears in Yukon.

Proposal 8. Prohibit the Roadside Hunting of Grizzly Bears in Southern Lakes

This proposal came as a joint submission between Carcross-Tagish Renewable Resources Council, and the Taku River Tlingit First Nation. The Nations represented by these bodies have a close cultural connection to grizzly bears, and would like to see prohibitions on roadside hunting of grizzly bears within 100 meters of the following roads: from the McLintock River Bridge to Jakes Corner, the Tagish Road; the Atlin Road to the B.C. border; the South Klondike Highway from the Carcross Corner to the B.C. Border.

This proposal highlights the fact that this topic has been the most important, most sensitive and emotional public wildlife issue these Nations have ever dealt with. It also clearly identifies that this proposal is not intended to affect, limit, or impede in any way on traditional or subsistence harvesting rights.



Recommendation:

5.1 The Board recommends the Minister **accepts** the proposal as it is written.

Rationale:

During the public review process, this proposal received more support than the previous adaptive management grizzly bear proposal (submitted by Environment Yukon), by all respondents who provided input. The Board believes this reflects the validity and support by Yukon’s public for community-led regulations, such as this proposal.

The Board acknowledges this is a community-led proposal which has been discussed extensively, and debated heavily over the past decade. This is not the first time this proposal has been put forward, and the Board acknowledges the patience and understanding shown by the Carcross-Tagish RRC in waiting for the Conservation Plan for Grizzly Bears to come into effect before re-submitting this proposal. This proposal has a high degree of support from the local level, is shaped by cultural values, the Board supports this proposal as it encourages the principles of fair chase and respectful hunting.

Finally, the Board notes this regulation directly aligns with the newly released Conservation Plan for Grizzly Bears in Yukon

Proposal 9. Change the burbot limits in Yukon Lakes to 3 per day and 6 in possession

This proposal, submitted by Environment Yukon, would change the current regulations surrounding burbot fishing in Yukon from 10 burbot per day and 20 in possession, to 3 burbot per day and 6 in possession. It would also amend the set-line license conditions from the current allowance of 10 hooks at any one time, to 3 hooks at any one time.

This proposal comes forward after burbot populations surveys were performed in 7 Yukon lakes. These studies found that burbot populations in these lakes were



lower than anticipated, and that conversely, the effort and harvest on burbot is increasing. These studies also showed that burbot abundances are low relative to current catch and possession limits, and a need for a regulation change was in order.

Before 2003, licensed burbot harvest was not subject to catch and possession limits in Yukon. When the change from unlimited harvest to a limit of 10 per day and 20 in possession was made, it was done without population data for Yukon burbot and the regulation limit which was imposed was essentially an arbitrary change from unlimited catch.

Given the current information on Yukon burbot abundance and harvest rates, Environment Yukon believes a change in management strategy is required to ensure burbot populations persist and that harvest is sustainable.

Recommendations:

- 6.1** The Board recommends the Minister **accepts** the proposal, with conditions.
- 6.2** The Board recommends that **only smaller lakes be included** in this regulation change, until further studies on burbot populations are conducted on Yukon's larger lakes.
- 6.3** The Board has requested that **Environment Yukon create a list** of which 'puddle lakes' are to be included in this regulation change.

Rationale:

During the review process, it became evident to the Board that the public strongly supports conservation efforts aimed at ensuring burbot populations persist in Yukon lakes, however, there was also a high degree of disapproval for a 'blanket regulation' to be put in place. The proposed regulation, as it is currently written, would affect all bodies of water, many of which have not been studied yet to monitor burbot populations and health.



The Board acknowledges that burbot are a slow growing species of fish, similar to Lake Trout, and that they are also a predatory fish which uses its sense of smell (scent) to locate its prey. Coupled with the fact that this is the only species licensed anglers are allowed to use set lines for, the Board realizes the potential for sudden over harvest on smaller lakes with low density populations, which could lead to a sudden population collapse.

Furthermore, the Board acknowledges this is an important fishery to conserve, while also offering some harvest opportunities. It is important to note that burbot population densities may be low in some smaller lakes because some of those lakes are more readily accessible to anglers, and their ecosystems may be less productive than larger bodies of water (such as Teslin, Atlin, Aishihik, Kusawa, and Kluane lakes).

The Board understands the intent of this proposal and believes strongly in the merit of the work that has been done Environment Yukon fisheries biologists. Nevertheless, the Board is not willing to change regulations for all Yukon lakes without further studies being done and feel that the proposal can still achieve its goal without changing the current harvest limits on the larger lakes in the Yukon.

During our deliberations, it was apparent that Environment Yukon is agreeable to the Board's stance on this topic and is willing to work with the Board to develop a list of lakes to be excluded from this proposed regulation change. Environment Yukon has also agreed to continue its work studying burbot populations on larger bodies of water, in order to supplement the limited data that is currently available and further enhance our body of knowledge on this matter.

Proposal 10. Remove Slot Size for Northern Pike on Teslin Lake

This proposal, submitted by the Teslin Renewable Resources Council, involves two components related to the catch limit of northern pike on Teslin Lake, as follows:

First, it would see the removal of the slot size for northern pike (with current restriction of only 1 individual over 41 inches to remain in place). Second, it would



revert catch limits of this species back to General Regulations (daily catch limit of 5 fish and possession limit of 10 fish).

This proposal stems directly from local conservation concerns over Lake Trout and salmon populations on Teslin Lake. Northern Pike are known to be highly predatory on these vulnerable and slow-growing species; species which hold esteemed cultural value to the local community and First Nations peoples. The local community also firmly believes there is no conservation concern for Northern Pike on Teslin Lake. By encouraging the harvest of pike on Teslin Lake for food, the local RRC believes this will help to alleviate the pressure on more vulnerable fish species, while still providing ample opportunity for harvest.

Given the current restrictions on pike harvest, many edible fish are being released into the lake, instead of being kept for food. This causes an increase in mortality rates of an otherwise edible food source, and also encourages a practice that is considered to be unsightly by the local community.

Recommendation:

7.1 The Board recommends the Minister **accepts** the proposal as it is currently written.

Rationale:

During the public review period, this proposal received very strong support by all respondents who chose to provide their input; ranging from individuals commenting on the online survey, to councils and associations.

The Board acknowledges that this is not a science-based proposal, but rather one led by a community perception of an ongoing issue and a harvest liberalization. It will, therefore, be a deviation from the normal 'regime' of fish management that is currently in place across the vast majority of Yukon waters.

The Board is in agreement with the proposal as it is currently written, owing to the fact that this is a community led initiative that encourages sustainable fishing and enhanced harvest opportunities, while also mitigating predation on lake trout which are slower growing and experiencing high harvest levels on Teslin Lake.



In addition, we anticipate further discussions with Environment officials and other members of the Angling Working Group on the existing fisheries management regime currently in use for licensed anglers, and hope to work towards better education, and potential improvements to the current system for freshwater fish in the Yukon.

Proposal 11. Habitat Protection Area – Off-road Vehicle Restrictions

This proposal, submitted by Environment Yukon, intends to give effect to provisions for restrictions on the use of motorized ground access (Off Road Vehicles, ORVs) by any user into Habitat Protection Areas (HPA), where approved management plans indicate ORV restrictions. Currently, only the Ddhaw Ghro Habitat Protection Area Management Plan includes such a provision.

The Management Plan for this HPA was approved by all parties in October 2018: Recommendation 39 of that HPA plan is to develop and advance regulation proposals addressing prohibition of motorized ground access into Ddhaw Ghro HPA, with the intention to restricting use of ORVs, *by any user*, within the HPA. This regulation would be established under HPA provisions (Section 93), prohibiting the use of motorized ground access (ORVs) into HPAs, per approved management plans.

Recommendation:

8.1 The Board recommends the Minister **accepts** the proposal as it is currently written.

Rationale:

During the public review period, the Board heard a mix of responses with regard to the proposal to restrict ORV access in Habitat Protection Areas. Many respondents were unsure whether this proposal would affect only the Ddhaw Ghro HPA, or all HPAs. There were also concerns raised by individuals and Councils about the redundancy in legislation being proposed by Energy Mines and Resources' on ORV restrictions. Many individuals seemed to be confused by



the potential overlap in legislation and how that may affect them, however overall there was a reasonable amount of support, especially by local conservation groups, for ORV management being a priority as future HPAs are created and their management plans are drafted.

There were also a number of comments recommending that Government of Yukon take further steps to strengthen protections for habitats and species threatened by ORVs, in addition to the proposed regulations through ORV Management Areas.

The Board understands that the regulation change, as it is currently written, would have limited immediate effect outside of the Ddhaw Ghro HPA. The Board supports this proposal, using Ddaw Ghro as a real-time example of how this regulation will come into place, while also allowing for the regulation to branch out wider in the future, as more HPAs are put in place.

Proposal 12. Surface Disturbance Thresholds in Critical Habitat for Species at Risk in HPAs

This proposal, submitted by Environment Yukon, will enable the Minister to manage and set thresholds in HPAs for surface disturbance in relation to Critical Habitat to meet Federal Species at Risk Act requirements, as prescribed in particular Recovery Strategies. Intent of this proposal is to designate all or portions of areas which contain critical habitat for species at risk (such as boreal caribou in the Peel) as being protected habitat and subject to limitations on surface disturbance. This proposal would provide for Ministerial authority to regulate total impacts to meet Species at Risk obligations.

Recommendation:

9.1 The Board recommends the Minister **accepts** the proposal as it is currently written.



Rationale:

During the public review period, the Board received an equal split amongst all respondents regarding this proposal. Many respondents commented saying ORV measures are vital to protect many species and critical habitats. An equal number of respondents found this proposal poorly worded and misleading, with a lack of tangible evidence or examples. Another concern raised is that as this regulation stems from the *Wildlife Act*, this measure can only protect vertebrate animals, meaning fish are left out of the protections and, therefore, only representing a small portion of species in Yukon. There was some suggestion that Yukon needs standalone species at risk legislation to adequately protect vulnerable species in the territory.

Overall, there seems to be some confusion around how this differs from other ORV regulations.

The Board understands that the importance of this proposal, and developing surface disturbance thresholds include natural (i.e. wildfires and landslides) as well as anthropogenic disturbances such as Off-Road Vehicles and exploration/mining. Furthermore, the Board is aware that the areas this regulation currently pertains to sees minimal human activity, almost zero harvest records exist in the area to date, and this regulation is essentially more about the ability to fight fires in the region and protect critical habitat for Boreal Caribou. The Board is supportive of this regulation change.

Proposal 13. Mandatory Furbearer Harvest Reporting

Conservation Officer Services Branch (COSB) is proposing to amend regulations to include mandatory licensed trapper reporting for all fur-bearers harvested on or before April 15, this date is 15 days after the close of the winter trapping season and consistent with other harvest reporting requirements related to licensed activities. COSB is proposing to make it an offence for failing to provide harvest information on or before April 15, similar to that of other reporting requirements. COSB is also proposing to make it an offence to provide false or



misleading furbearer harvest information; and to prohibit the issuance of a trapping licence if a harvest report has not been submitted related to any trapping licence issued previously.

Recommendations:

10.1 The Board recommends the Minister **accepts** the proposal.

10.2 The Board recommends that **Environment Yukon engage with industry**, as well as the Teslin Renewable Resources Council, to ensure they are agreeable with the conditions regarding potential offences included in this proposal.

10.3 The Board recommends that the date of April 15th be revisited by all affected parties involved in this proposal, due to the incorrect season end date listed (as April 15th).

Rationale:

The Mandatory Fur Harvest Reporting regulation change stemmed from a recommendation from the Board in December of 2017, as a variation from the proposal for mandatory sealing requirements for marten - advanced by the Carcross Tagish RRC. Specifically, **“11.2 The Board recommends undertaking the development of a comprehensive, mandatory fur harvest reporting system, in direct collaboration with trappers and the Yukon Trappers Association, as well as all Renewable Resource Councils and First Nation Governments”**.

During the public review period, this proposal received strong support from all respondents who provided their input on the matter, however, some respondents that would be directly affected by this regulation change brought to the Board’s attention the fact that during initial discussions, and the original recommendation by the Board did not include the language surrounding potential offences (i.e. *if a trapper fails to comply with the mandatory harvest reporting*). These parties are in support of the proposal but are confused as to why the proposal was changed to include this section.



It should, therefore, be clarified with industry and those affected parties to ensure the outcome of such circumstances is supported by those bodies. Furthermore, it was also brought to the Board's attention that while the standardization of reporting is acceptable, the end of trapping season is actually June 30th, when beaver (also considered a fur-bearer) season closes, therefore a modification of this proposal might be in order.

The Board understands the importance of collecting accurate harvest data, as this can influence the allocation of new or underutilized traplines. Furthermore, the Board acknowledges that potentially taking traplines away from trappers because of a failure to report their harvest, may be an unnecessarily drastic measure in the case of traplines held by elders or those who require assistance. However, the Board understand that without some kind of tangible repercussion for not complying, this regulation would be for naught.

Proposal 14. Allow for wolves and coyotes to be harvested and recovered using snowmobiles in designated routes of Zone 5

This proposal, submitted by Alsek Renewable Resources Council, intends to amend regulations to harmonize the recovery rules around harvested wolves and coyotes with the recovery of harvested bison.

Currently, the use of a snowmobile is only permitted for the purpose of hunting and transporting bison during the bison season (in these GMS) and no other species may be hunted or transported by snowmobile at any time on the designated routes. Alsek RRC is proposing that should a hunter encounter a wolf or coyote while out on a bison hunt in Zone 5, they should be allowed to harvest the animal and transport it back on their snowmobile (legally).

Recommendations:

11.1 The Board recommends the Minister **accepts** the proposal.



11.2 The board recommends the **proposal be clarified to include the specific Game Management Subzones** to which this regulation is intended to address (i.e. GMS 5-34 5-36, 5-37 and 5-38 and 5-39).

11.3 The Board recommends that the Minister makes provisions to **ensure that this regulation is specific to those who are legally allowed to bison hunt only.**

Rationale:

The Board supports the rationale that bison hunters should be allowed to harvest wolves and coyotes while out bison hunting in GMZ 5, however, the Board does not want snowmobiles to be used to chase or otherwise harass wildlife. Therefore, the Board supports this proposal on the condition that it must be restricted to those hunters out legally bison hunting (i.e. hunters must have a bison seal that has not been cancelled, or has been cancelled but the wolf/coyote were harvested on the same outing).

This proposal received support throughout the public review process, by online survey respondents, Councils, and associations. There were, however, comments from conservation groups that echo the stance of the Board on this subject, noting the potential of this regulation opening up predator hunting in a manner that skirts the boundary of what is ethical hunting, and the practice of fair chase.

It should be noted as well that the subzones in question, particularly those bordering Kluane Lake are sensitive habitat areas that are subject to a significant amount of access and disturbance already. Despite the RRC's desire to right this perceived "wrong", the area should be managed with consideration of its sensitivity and it should also be noted that these subzones have a significant amount of Category A land within them, so harvesters should be educated not only on this liberalization, but the respectful use of the area and its cultural history and significance.

Administrative Regulation Changes:

The Board recommends the Minister of Environment **accept** the following proposed Administrative Regulation Changes:



12. Allow trappers to sell non-edible by-products (i.e. skulls, bones, claws) from fur-bearing animals, wolves and coyotes

Amend section 16 of the Trapping Regulation in order to allow trappers to sell non-edible by-products (including skulls, bones, and claws from fur-bearing animals, such as wolves and coyotes).

Licensed trappers may currently sell legally harvested pelts of fur-bearing animals from black bears, wolves, and coyotes, under the authority of their trapping license, however, trappers must obtain a wildlife act permit to sell non-edible by-products other than pelts from their harvest including such things as skulls, claws or bones. Trappers would still be restricted from sale of black bear claws and organs.

This amendment would remove barriers to trappers seeking the most commercial benefit from their harvest and expansion of their markets into areas other than fur. This would also reduce paperwork and administration processes for legally harvested fur-bearing animals, and improve client service, which would better support Yukon's trapping industry.

13. Standardized pelt sealing for wolf, wolverine, and lynx

Standardization of pelt sealing requirements for wolf, wolverine, and lynx to April 15 (or prior to sale or transfer of pelt—whichever comes first) requires the amendment of section 20 and repeal of section 20.1 of the Trapping Regulation.

Section 20 of Trapping Regulation requires sealing of wolf, wolverine, and lynx pelts within 15 days of season closure for each species (or prior to sale, transfer of pelt—whichever comes first). Trapping seasons for lynx, wolves and wolverine close on March 10, March 31 and February 28, respectively (once the amended wolverine trapping season dates come into effect). Creates pelt sealing deadlines of April 15 for wolf and lynx; March 15 for wolverine.



Section 20.1 of Trapping Regulation provides opportunity for a trapper to request an extension until April 15 to seal pelts (should they remain on the trapline past the close of the season). Request must be made in advance, requires written authorization of a Conservation Officer. These timelines potentially require a trapper to attend a local Environment office more than once to seal their furs.

This amendment is required to promote compliance, provide administrative efficiency, improve client service and will simplify regulations by removing the current requirement for trappers to pre-arrange special deadline in advance (if they will be out on the trapline).

14. Administration of First Nations Community Group traplines

Currently several traplines throughout Yukon are administered by local First Nations. "Community Group Traplines" are administered as group trapping concessions with no group members and an official from that First Nations named as a spokesperson for the group. Assistant trapper licenses are issued to trappers for community group line through written authorization provided by spokesperson to Department of Environment.

Amending the Trapping Regulation would formally recognize community group trapping concession areas by creating within the Trapping Regulation, a new regulatory authority defining these areas and a new schedule identifying which specific trapping concession areas form community group traplines are administered by First Nations Governments.

This change is required to comply with chapter 16 of Umbrella Final Agreement: respecting local First Nations local interests, knowledge, rights in administration of traplines. It will provide formal regulatory authority to allow First Nations to administer these group traplines and aligns with the Government of Yukon's commitment to reconciliation with First Nations.

The implementation of this measure would simply formalize practices currently in place.



15. Allow issuance of Fur Trading License to Corporations

The current legislation prohibits the issuance of Fur Trading License to a corporation. This requires Departmental staff to issue fur trading licenses to individuals working with the corporation. In some instances (e.g. the Yukon Trappers Association), these individuals are volunteers who then take on the legal obligations of the license on behalf of their employer or association.

Amend section 106 of Wildlife Regulation to add Fur Trading Licenses as license which can be issued to other than an individual as required by section 125 of the Wildlife Act. Proposal is also to repeal subsection 13(4) of the Trapping Regulation requiring issuance of a Fur Trading license to “agent” for licensed fur trader and replace this subsection with:

“A fur trading license issued to a corporation authorizes any agent of that corporation to act under the authority of that license.”

This change is required to update the Trapping Regulation to recognize current industry needs and improve client service to the trapping industry. This will further allow all volunteers or employees working for named corporations/associations to conduct activities authorized in license, without requirement of additional licenses being issued.

This will better support the trapping industry and recognize the current needs and activities of Yukon Trappers Association.

16. Generic Yukon seal and online registration of seal to an e-license

The Department of Environment is developing a new administrative and regulatory regime for the issuance of seals for all license holders: this will include a new generic seal, instead of species-specific seals.



Proposed Process for Purchasing Seals

1. Hunters purchase books of uniquely identified seals at various vendors across Yukon.
2. Hunters may renew or update hunting license by registering seals on their Environment ID account, pay appropriate seal fee + complete required administrative process determined by Minister to validate seal, and hunting license through e-licensing.
3. Hunters would be able to print off copy of new updated hunting license (or save pdf copy on phone) along with seals and carry both while in the field to be able to produce these documents on request of a conservation officer.

This proposal would:

Revoke all species-specific big game seals + replace with generic Yukon big game seal; granting Ministerial discretion to determine any/ all conditions that apply to seal (similar to current ability to set conditions on licenses + permits).

See an amendment to section 19 to require a person to record information, such as species, year and name, Environment ID or other relevant information on seal at time of issuance, granting the Minister discretion to determine how this information is recorded.

Amend s.22 validating seals upon registration on department e-licensing system, in accordance information requirements in section 19.

Create a new offence (with fine under the Summary Act Regulations): "failing to complete information requirements on seals", and create a new offence (with fine under the Summary Act Regulations): "failing to provide current license, permit or seal on request of a conservation officer". Finally, it would establish a fee schedule for generic seals.



17. Remove hunter education requirement for trapping concession holders born after April 1, 1987

Remove the requirement for Yukon hunting license eligibility for trapping concession applicants in subsection 6(1)(d) of the Trapping Regulation. Appropriate hunter education training is an eligibility requirement for big game hunting license holders. Applicants such as First Nations beneficiaries who aren't subject to licensing should not be prevented from obtaining a Yukon trapping concession.

Paragraph 6(1)(d) of Trapping Regulation requires concession holder to be eligible to hold Yukon hunting license. For concession applicants born after April 1, 1987, this includes completion of hunter education training (HEED, or other Government of Yukon accepted equivalent). Yukon Trapper Education training meets appropriate goals/ criteria for trapping, is requirement for trapping concession eligibility.

Any hunting conducted by a trapping concession holder other than that of fur-bearing animals within their concession area (authorized under their trapping license) requires concession holder to obtain Yukon big game hunting license. Appropriate hunter education training is required for any individual born after April 1, 1987 who wants to obtain this license.

This aims to remove barriers for trapping concession applicants, particularly younger ones needed to replace an aging trapper population. To allow First Nations subsistence hunters who don't require hunter education training but want to trap commercially the ability to

obtain trapping concession. This change supports Government of Yukon mandate of reconciliation with First Nations with Traditional Territory in Yukon. It also supports the Yukon fur industry; promotes youth and First Nations participation.

Thank you for reviewing our recommendations, the Board looks forward to your response. In accordance with sections 16.8.4 to 16.8.6 of the Umbrella Final Agreement, our recommendations will remain confidential unless you choose to waive this requirement. The Board does not have any concerns, should you



choose to waive the confidentiality requirement under the 16.8.0 process of the Umbrella Final Agreement.

If you have any questions or concerns, please contact our Executive Director, Graham Van Tighem, at (867)-667-5835.

Sincerely,

John Burdek, Chair, Yukon Fish and Wildlife Management Board

CC: Christine Cleghorn, Director, Fish and Wildlife Branch, Department of Environment