Nov 15th 2017

Yukon Fish and Wildlife Management Board
Box 31104
Whitehorse, YT
Y1A 5P7

Dear Yukon Fish and Wildlife Management Board,

Yukon Conservation Society (YCS) is pleased to provide comments on proposed changes to the Yukon Wildlife Act Regulations, 2017.

Proposals 1 through 6, Changing various water body designations to an increased level of conservation: YCS supports these proposals

Proposal 7, Aquatic Invasive Species Inspection Authority: YCS supports this proposal

Proposal 8, Change in moose hunt season and permit #s, GMZ 7: YCS opposes this proposal because in our opinion it fails to address the reason the original regulation was introduced, i.e. when not enough permits are successful an extended season with limited time permits was introduced. The mechanism for obtaining the permits gave a slight preference to local harvesters, and in the opinion of YCS, this method of devolving harvest opportunities to locals leads to a higher level of general stewardship and thus should be retained.

Proposal 9, Allow for abandonment of black bear hides or meat: YCS opposes this proposal because: it fails to address the issue that bears are considered furbearers, a bear hide can be readily looked after (e.g. scraped and dried) with minimal cost without tanning. Tanning a bear hide is not prohibitively expensive, abandoning the hide is disrespectful to the bear and the proposal as written does not make clear that at least one of the hide or flesh of the bear be retained.

Proposals 10, Sheep hunting closure at Sheep Mountain: YCS supports this proposal.

Proposal 11, Pelt sealing of marten: YCS supports the intent of this proposal; we would also support a proposal to ensure mandatory reporting of fur harvests, similar to other commercial harvests.

Proposal 12, Wolverine trapping season adjustment: YCS supports this proposal.

Proposal 13, Personal Exemption Amount for Export Permit for Meat: YCS opposes this proposal. According to the figures supplied (over 1000 permits for 10kg over five years), if this
Proposal were to go forward, up to 2,000kg, two tonnes, of meat a year could be exported with no oversight. YCS is concerned such a liberal regime would be wide open to abuse.

Proposal 14, Allowing under 12s to hunt small game without a HEED course: YCS cautiously supports this proposal. While we support the idea that hunters should take the HEED course, we do acknowledge the problem of younger youth taking the course. YCS does suggest that the accompanying licensed hunter should show proof of having taken the HEED course.

Thank you for the opportunity to comment.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Sebastian Jones,

Yukon Conservation Society

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