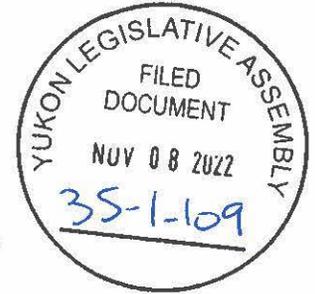




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Honorable Nils Clarke, Minister of Environment
Yukon Legislative Assembly
Box 2703
Whitehorse, Yukon
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November 7, 2022

Minister Clarke,

Thank you for your November 7 letter and the engagement of your officials in response to the October 24, 2022 Yukon Outfitters Association (YOA) letter. We have reviewed Bill 20 in detail and identify the following elements that require detail and definition. Primarily, we reiterate that species-specific standards of care require development that fit the Yukon outfitting context. These working horses and dogs are an integral part of many Yukon outfitting businesses and make a significant contribution to our successful operations. Given the key role they play in business success, these animals are afforded an appropriate level of care with provision of food, water and health care to ensure they are fit to complete the work we ask of them. That being said the species-specific standards of care must acknowledge the Yukon context that these animals work and live in, and the hardiness of the animals we choose, to ensure they can endure the often harsh environmental conditions of the Yukon.

We cannot support the current draft of Bill 20 without amendments to the legislation itself detailing the "standards of care" for working animals that fit Yukon and definition of terms that fit the Yukon and outfitting context. We do not favor the approach of deferring this work until the development of subsequent regulations, which are easily subject to being changed by the "Government du jour" of the future. As such, we reiterate our request from our previous letter to place a pause on this bill so that the YOA and other stakeholder groups can be appropriately consulted and ensure the standards of care are fitting at the legislation level.

Our perspective on Bill 20 is colored by our recent experience with the Department of Environment's revision of outfitter quota process, implementation of Moose Management Unit harvest restrictions resulting in significant unintended consequences, removal of licensed harvest of Finlayson Caribou (with no recovery plan defined), and an intent of the Department to unilaterally revise the long established "Guidelines to establish Outfitter Quotas." Our collective experience around these and other unresolved issues do not instill confidence that outfitter interests will be addressed if we defer the details lacking in Bill 20 to the development of supporting regulation.

We will gladly participate in further consultation to ensure that the outfitting context is considered and that the new act delivers intended outcomes of animal protection and control.

Sincerely,
Rosie Sandulak
Vice President, Yukon Outfitters Association

CC: Hon. John Streicker, Minister of Energy, Mines, and Resources
Manon Moreau, Deputy Minister of Environment
Dr. Mary Vanderkop, Chief Veterinary Officer
Currie Dixon, MLA
Kate White, MLA