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# YUKON CHAMBER OF COMMERCE

Suite 201 - 208 Main Street  
Whitehorse, Yukon Y1A 2A9  
Website: <http://chamber.yukon.net>

Tel: (867)667-2000  
Toll-free: 1 800 661-0543  
Fax: (867)667-2001

Jan 5, 1998

Hon. Eric Fairclough  
Minister of Renewable Resources  
Government of Yukon  
P.O. Box 2703  
Whitehorse, Yukon Y1A 2C6

Dear Minister Fairclough

**Re: Development of Yukon Protected Areas Strategy**

After meeting with representatives of business organizations, the Yukon Chamber of Commerce wishes to formally submit this letter of concern regarding the development of a Yukon Protected Areas Strategy. As one of the Yukon Protected Areas Strategy Advisory Committee (YPASAC) members, we regret that this submission could not be made earlier, but the timelines set for this strategy to be put into place is one of our concerns.

We acknowledge the purpose of the YPASAC is to advise the intergovernmental YPAS Steering Committee on issues relating to the principles and development of a YPAS. It is expected that committee members will keep their respective organizations informed of the key issues and items discussed during YPASAC meetings.

1. **Overall, we are concerned that there is no clear process in place over the long term.** A commitment to key steps would strive to keep all parties on track during the development of the strategy, irrespective of political changes at all levels of government. The groundwork or parameters for establishing a strategy that fairly reflects all interest groups is not fully defined.
2. **The concept of interim protected areas is a major concern.** Although most people understand the need, the definition and application of interim protected areas has not yet been established. For example, when an area is deemed to be under interim protection, there are no guidelines in place to modify or reduce the area under protection when appropriate or required. Guidelines for interim protected areas must be clearly defined.
3. **There must be clear criteria for identifying all interests in an area.** Although 23 ecosystems have been identified, the resources throughout these areas have not been completely identified. As much of the Yukon remains unmapped in terms of resources and values, guidelines for developing the strategy

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must clearly specify how much land in the Yukon will be affected. We already know that 16% of the Yukon will be under the jurisdiction of Yukon First Nations as part of the land claims process. We need to know what further percentage of Yukon lands will be deemed to be protected under the strategy. Results of a Fraser Institute survey of Canadian mining companies showed that 39% of mining companies believe uncertainty over future protected areas is a deterrent to exploration investment in the Yukon.

4. **It is imperative that all representative groups be given the opportunity to provide their input**  
There has not been a strong representation from the First Nations in the communities. Their input is especially crucial as we need to know how this process will work with the mandates of First Nations and the Special Management areas identified through claims.

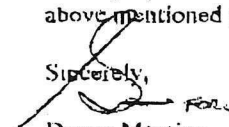
As well, other stakeholder groups in the territory have not been given adequate time to provide their input. Many have been busy with their businesses during the summer and fall months. We recommend an extension be made to the proposed deadline date of January 9, 1998 for public consultation. According to the minutes of the last YPASAC meeting, only about 200 people have attended the open houses to date, which is a very small percentage of the Yukon people who will be affected by this project.

The Yukon Chamber of Commerce is committed to be a collective voice of Yukon's business community. We work to create a climate conducive to a strong private sector economy by providing leadership and representation on issues and projects affecting business.

We are also committed to work with all levels of government and we always look forward to working with all governments in the best interests of everyone. It is important for the future well being of all Yukoners

This is a very important issue and will affect all Yukoners for decades to come. We do respect your desire to complete this project as set out in the timelines discussed. However, as government has stated that one of your mandates is to get as much information from the public as possible, we would appreciate an extension of the proposed January 9, 1998 deadline for more public consultation and also your response to the other above mentioned points.

Sincerely,

  
Donna Mercier  
President

cc.

Shirley Adamson, Grand Chief, Council of Yukon First Nations  
William Oppen, Deputy Minister of Renewable Resources  
Bob Kuiper, Chair, Yukon Protected Areas Strategy Steering Committee  
Yukon Protected Areas Strategy Advisory Committee members  
Ian Robertson, President, Whitehorse Chamber of Commerce  
John Alton, Klondike Placer Miners Association  
Rob McIntyre, President Yukon Chamber of Mines  
Pat Irvin, President, Tourism Industry Association of Yukon  
Yukon Chamber of Commerce members and Community Chambers  
Marsha Thompson, Yukon Outfitters Association  
Dorine Girouard, President, Yukon Agricultural Association  
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