
BACKGROUND

December 5, 2011

Ministry of Forests, Lands and Natural
Resource Operations

Harvest Allocation Policy Review recommendations and responses

In March 2011, the Ministry received the *Harvest Allocation Policy Review* report from former Deputy Minister Chris Trumpy, who was contracted to review the policy. The report contained eleven recommendations. The Ministry's responses to these recommendations will be applied to the 2012-2016 allocation period. Those recommendations and the ministry's response as set in the new Harvest Allocation Policy are summarized below.

Recommendation 1

The allocation split between resident and guided hunters should not be set by species at the regional level using the new allocation model. While the model should inform the decision, the Ministry should also consider actual splits using data available for the last 10 years and circumstances unique to each region. A base level of guided hunter split should be available to every guide but regional managers should have some discretion to allocate individual guide share above the base level up to a regional split determined by the Ministry.

Ministry Response: Supports regional manager discretion through a consultative and transparent process. Policy will cap changes in allocation splits between allocation periods to no more than 10%

Recommendation 2

The splits should be set, beginning in 2012, for a minimum of 10 years.

Ministry Response: Maintain five-year allocation periods in order for the policy to be responsive to hunter harvest and effort trends. Capping changes in allocation splits between allocation periods at 10% should provide the guiding industry the certainty around shares this recommendation looks to achieve.

Recommendation 3

Allocation within a region to individual guides should consider access, level of resident hunter activity and be determined by the regional manager. The reasons for variances from the base level of regional splits should be disclosed.

Ministry Response: Supports regional manager discretion through a consultative and transparent process as the way to deliberate on this matter.

Recommendation 4

Individual guides with small allocations (less than 5 animals over a 5 year period) should be permitted to harvest all their allocation in a single year provided there is no impact on population sustainability.

Ministry Response: For the next allocation period and for moose only, guides allocated three or fewer moose over a 5-year period may harvest all of their 5-year allocation in a single year; guides allocated four or five moose over a 5-year period may harvest up to three animals in any one year. For subsequent allocation periods, other species may also be considered.

Recommendation 5

All of the allocation in areas where there are no guide territories should be allocated to resident hunters.

Ministry Response: Allocate all of the Annual Allowable Harvest to residents in areas without guiding territories. This response is consistent with the Harvest Allocation Implementation Plan for 2007-2011.

Recommendation 6

Species on General Open Season (GOS) for residents should not be on quota for guides.

Ministry response: This recommendation is supported in principle; however, it may not be feasible in all cases and it is not recommended for mountain sheep. Hunts will need to be reviewed on a region-by-region basis to determine if quotas are required.

Recommendation 7

If guides in a region fail to use their allocation over a two or three year period then it should be made available on a temporary basis to residents through a one or two year increase in LEH authorizations where such actions have no impact on population sustainability. There would be no possibility for reduction to guide split until the end of the 10 year period.

Ministry response: The Ministry does not support this recommendation. It is likely that the recommendation would not substantively increase resident opportunity and would require extensive tracking of individual hunts and substantial resources to support it. Further, neither the GOABC nor the BCWF tended to support this recommendation.

Recommendation 8

Regional managers should have access to a wide range of tools to support industry achievement of its split, at both the regional and individual guide level. Tools dropped in the new policy should be reconsidered and new options explored provided they are consistent with good wildlife stewardship.

Ministry response: The new policy will institute a Flexible Quota System, which will allow guides to more fully harvest their 5-year allocations while also providing them some flexibility to exceed that allocation should their clients be exceptionally successful at harvesting animals.

The new policy will also increase utilization increments to 25%, allowing under-harvesting by 25% before the allocation share could be reduced. This tool will address concerns that high performing guides can have their shares negatively affected by under-performing guides, alleviating a contentious issues with the allocation policy.

Finally, the new policy will allow guides to exceed quota without incurring penalty if they applied area-specific success rates. Area-specific success rates are a way for guides to use the historic average of his client's harvest success rates for a particular species, in order to determine how many clients to book to harvest the desired number of animals. Under this model, if the quota was exceeded because of unanticipated higher than average harvest success rates, the guide may not be penalized if they can demonstrate they used the average species-specific success rates within their guiding territory for deciding how many clients to book.

Recommendation 9

Guides not utilizing their allocation should be encouraged or required to transfer it to guides in adjacent territories provided there are no impacts on population sustainability.

Ministry response: Guides may share quota under specific circumstances, such as acceptance among the affected guides, if population sustainability is not a concern, if resident success rates will not be substantively impacted, and that decisions are transparent and disclosed.

Recommendation 10

The Ministry needs to clarify its policy for vacant guide territories to provide certainty for the industry. Fractional sales which provide marginal additions to strengthen existing operations should proceed.

Ministry response: The Ministry supports a process for selling fractional and vacant guide territories.

Recommendation 11

The Ministry should consider facilitating the consolidation of guide territories in regions where small territories are the norm to encourage more viable operations.

Ministry response: Small guide territories may be consolidated under specific circumstances.

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