

Ref: 194398

December 14, 2012

Dear Guide Outfitter:

RE: Implementation of the Harvest Allocation Policy for 2013

I am writing this letter to inform you of recent decisions made on the implementation of the Harvest Allocation Policy. This policy and supporting procedure describe the process for Ministry staff to consider when determining how the government should divide the annual allowable harvest (AAH) of specific game populations between resident hunters and guides. More information can be found on the Harvest Allocation website: http://www.env.gov.bc.ca/fw/wildlife/harvest_alloc/.

Since early 2012, the Ministry has been examining how the Harvest Allocation Policy should be implemented in 2013 and beyond. Direction is now going out to regional Ministry staff that:

- 1. The Harvest Allocation Policy should be fully implemented for the 2013/14 licence year. Full implementation includes:
 - a) The allocation splits for an allocation period, as determined by the Director, and with assistance from the Harvest Allocation Procedure, should be applied to the AAH within a guide's territory to determine his or her allocation.
 - b) In areas without guide territories, 100% of the AAH should be provided to resident hunters.
 - c) Ministry policy does not support the use of regional success factors in determining guide allocations and quotas.
- 2. Guides who may be "substantively impacted" by the policy's implementation should have those impacts mitigated for the remainder of the current allocation period, after which those mitigation measures should be removed.

Individual guides should be considered "substantively impacted" if their 2012-16 allocation would decrease by more than 30% compared to their 2007-11 harvest for that species, excluding any changes in allocation not attributable to the Allocation Policy (e.g. changes to a game population AAH). In specific instances, staff may have to adjust the 2007-11 harvest figures to account for legitimate periods of guide inactivity or past allocation periods that may have differed in some areas.

Further, to mitigate the impacts of the policy for those that have been "substantively impacted," staff will consider capping those decreases at no more than 30% of their 2007-11 harvest. To

http://www.env.gov.bc.ca/fw/

achieve this cap, Ministry staff will consider the conservation of the species/population, underutilization of harvest opportunity, and temporary adjustments to resident hunter opportunity in their decision.

3. The 2013/14 licence year will be considered year 2 of a 5-year allocation period that started in 2012 and will end in 2016.

When it was decided that the impacts of fully implementing the Harvest Allocation Policy would be mitigated for the 2012/13 licence year, it was questioned whether 2012 would be considered its own one-year allocation period, or if it would be considered year one of a standard 5-year (2012-16) allocation period.

I can confirm that 2012/13 will be the first year of a 5-year allocation period, and 2013/14 will be considered the second year, because:

- a) For 2012, regions were asked to consider developing quotas using "potential" 2012-16 allocation numbers. This was done so staff could apply administrative guidelines to quota calculations.
- b) For sensitive species such as grizzly bear, it is imperative to ensure the potential for over-harvest is mitigated, which can be achieved by managing over 5-year periods.

Some allocations for 2012 were originally calculated using a different formula. To account for this, the portion of an individual guide's 2012 harvest that was greater than one fifth of the new 2012-2016 five year allocation, should not count against the allocation that is available for the remainder of the allocation period (i.e. 2013-2016). Where 2012 harvests were less than one fifth of the new 2012-2016 allocation, the standard allocation policy calculation for the subject species should apply. It must be recognized that such adjustments cannot adversely affect conservation or First Nations harvest needs.

In some areas of the province, the AAH for allocated species changed in 2012, and those changes will be applied to the 2013/14 hunting season, along with the implementation of the Harvest Allocation Policy. The Ministry's Administrative Guidelines Procedure (available at: http://www.env.gov.bc.ca/fw/wildlife/harvest_alloc/) provides guidance for wildlife managers to consider when faced with an allocation change mid way through an allocation period.

4. Harvest allocation splits, as determined through the Harvest Allocation Procedure, will not be recalculated until the 2022/23 licence year. This means that allocation splits determined for the 2012-2016 allocation period should remain unchanged until the end of the 2017-2021 allocation period.

One of the concerns voiced during the 2007-11 transition period was that both resident hunters and guides did not know what their shares would be at the end of that transition period. This was because the allocation splits, as determined through the Harvest Allocation Procedure, were going to be recalculated for the 2012-16 allocation period. By holding those splits constant for the first full allocation period after the 2012-16 extended transition period, regional staff will be

able to provide both guides and residents with better information sooner on what their allocations may be for 2017. Any allocation projections are to be considered preliminary and not final, and subject to change.

A number of new initiatives and previous commitments will be maintained with full implementation of the Harvest Allocation Policy, including the following:

- 1. An Allocation Working Group (AWG) comprised of regional and headquarters staff, has been formed. This group will:
 - d) Work to ensure consistent and transparent approaches to regional decision making and communications relating to harvest allocation and the assignment of quota.
 - e) Develop strategies to address issues of under and over-harvest, and changes in annual allowable harvest.
 - f) Develop and improve allocation policies and procedures in order to reflect direction received.
 - g) Review and implement recent changes to policy, legislation and regulations that increase guide certainty.
 - h) Consider the development of new licence products that increase resident hunter opportunity.
- 2. Most of the Ministry responses to the recommendations in the 2011 *Harvest Allocation Policy Review* will be maintained with the exception of the recommendation concerning the use of what was once called "area-based success factors" (see response #8 at: http://www.env.gov.bc.ca/fw/wildlife/harvest_alloc/docs/FS_Nov2011.pdf), but is now referred to as a "guided client calculation system". As it is currently an offence to break licence conditions by exceeding quota, regulation changes are required for this recommendation to be effective, and the Ministry is currently reviewing the issue.

The Harvest Allocation Policy and Procedure, along with the recent policy direction will provide guidance for Regional Managers and their delegates to consider when assigning annual quotas for allocated species. Once quota calculations for 2013 have been finalized, you can expect a letter from the Regional Manager explaining how your quota was determined.

In the meantime, however, if you do have any specific questions or comments, please contact wildlife staff at your regional Ministry of Forests, Lands and Natural Resource Operations office. Regional Office phone numbers can be found at: http://www.env.gov.bc.ca/fw/offices.html.

Thank you.

Original Signed by:

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