

Morrison, Trevor FLNR:EX

From: Daniel MacDonald (GOABC) <MacDonald@goabc.org>
Sent: Friday, October 17, 2014 9:02 AM
To: Minister, FLNR FLNR:EX; Thomson.MLA, Steve LASS:EX
Cc: Bond.MLA, Shirley LASS:EX; Bennett.MLA, Bill LASS:EX; Barnett.MLA, Donna LASS:EX; Morris.MLA, Mike LASS:EX; Scott Ellis; Aaron Fredlund; brian@monasheeoutfitting.com; info@bcguideoutfitters.com; Michael Schneider ; Scott Ellis
Subject: Letter regarding recent Allocations Working Group & Harvest Allocation Policy
Attachments: LETTER - Minister Steve Thomson re. Resolution to HAP 17.10.2014.pdf

Hello Minister Thomson,

Attached is a letter on behalf of the Guide Outfitters Association of BC regarding recent Allocations Working Group meetings, and our stance on the Harvest Allocation Policy.

We would like to request a meeting in Victoria for October 27th, where we would be interested in further discussing these matters with you. Please contact us if this time is suitable for you, or with an alternative if you find that it is not.

Thanks very much.

Regards,

Daniel MacDonald
Policy and Communications Assistant
Guide Outfitters Association of British Columbia
Phone: 604-541-6332



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Guide Outfitters Association of British Columbia™

Suite 103, 19140 – 28th Avenue, Surrey, BC Canada V3Z 6M3 Telephone: (604) 541-6332 Facsimile: (604) 541-6339 Email: info@goabc.org

October 17, 2014

The Honourable Minister Steve Thomson
Minister of Forests, Lands, and Natural Resource Operations
PO Box 9049 Stn Prov Got
Victoria, B.C. V8W 9E2

RE: Fair resolution to the Harvest Allocation Policy

Dear Minister Thomson,

The Guide Outfitters Association of British Columbia (GOABC) appreciates your continued support of the guide outfitting sector. The establishment of the Allocations Working Group (AWG) was another sign of your desire to implement a Harvest Allocation Policy that is fair and balanced for all concerned parties.

The AWG's goal was to provide a "better understanding of the full impact of the policy on both the guide outfitter and resident hunting sectors, and to determine how the policy fits with the original guiding principles and objectives from the terms of reference used in the development of the new Harvest Allocation Policy." We believe that your AWG team has done a fine job of understanding the complexities of the new Harvest Allocation Policy, and in developing a framework package for it, but we do not see the proposed AWG package as mitigating the financial impacts to our sector.

The negative financial impacts to the guide outfitting industry arising from the implementation of the new Harvest Allocation Policy have been well-documented. The Economic Impact Assessment completed by Lion's Gate Consulting for the AWG confirmed that there are significant financial impacts to the guide outfitting sector as a result of the new Harvest Allocation Policy. This report is consistent to the 2011 Chris Trumpy Report, which estimated that "the actual revenue loss would be in the neighbourhood of \$6 million annually" for the guide outfitting sector. The Trumpy Report also states that the implementation of the new Harvest Allocation Policy, intended to bring consistency, fairness, equity, and transparency to wildlife allocation, had largely failed in its mandate and "...has failed to be fair."

The BC Wildlife Federation (BCWF) is seeking legislative splits that would see the resident hunters share increased above current allocation levels. Given the findings in the Lion's Gate Consulting assessment and the 2011 Chris Trumpy Report, it is clear that implementing the legislative 'splits' proposed by the BCWF would devastate the guide outfitting industry in British Columbia.

Our desire is to find a fair and equitable solution which addresses the financial hardship to the guide outfitting industry that has been caused by the implementation of the new Harvest Allocation Policy. In order to help you with your decision, we have clearly set out our position below on the key issues discussed with the AWG:

Legislated Allocation Percentages

AWG Recommendation: 'Legislated 'splits' at the current allocation calculator split percentages'

LETTER – Fair resolution to the Harvest Allocation Policy (OCTOBER 2014)

Legislated splits would provide more business certainty to the guide outfitting industry with respect to future allocations between user groups. However, the current splits have caused, and will continue to cause, the bulk of the negative financial impacts and hardship to many of our members.

We therefore recommend that government implements legislated splits as follows:

- 60:40% (resident-to-outfitter) ratio for sheep, goat, and grizzly bear;
- 98:2% (resident-to-outfitter) ratio for antlerless species;
- 75:25% (resident-to-outfitter) ratio for the remainder of 'Category A' species

Implementing splits at those ratios would have a minimal impact on the resident hunting opportunity, and would bring the allocation levels closer to the historical levels that existed prior to the implementation of the new Harvest Allocation Policy. These proposed splits would also go a long way to reducing financial impacts, and would decrease the need for compensation towards negatively-affected outfitters.

Mitigation and Compensation

AWG Recommendation: 'Mitigation to guide outfitters for loss of quota, through the direct awarding of fractional and vacant territories, and/or compensation/retraining through an established mitigation trust'

We agree that all types of mitigation and compensation should be available to the affected guide outfitters. We request priority be placed on amending the *Wildlife Act* to allow for the direct awarding of vacant guide territories to impacted outfitters. In addition, fractional territories need to be dispersed to guide outfitters who have lost quota as soon as possible. Delays in this disbursement would create additional hardship on the affected parties.

We also request that government provide the resources required to establish a mitigation trust for the purposes of compensating affected guide outfitters. This measure should also be implemented as soon as possible.

Administrative Guidelines

AWG Recommendation: 'Increased flexibility in the Administrative Guidelines, to better allow the ability to harvest the 5-year quota'

We agree that the annual Administrative Guideline percentage should be increased, as doing so would provide guide outfitters greater flexibility with respect to the management of their allocation. We request that government implement the increased Administrative Guideline as soon as possible.

Population Management Units (PMU's)

AWG Recommendation: 'Change to management by Population Management Unit (PMU)'

We do not support changing the spatial scale used to determine allocations until sufficient due diligence has been completed. Changing the spatial scale at this time would further complicate potential changes in quota to guide outfitters.

After the work on PMU's is completed and a quota impact analysis is conducted at a guide territory level, we would be happy to discuss the spatial scale that applications be applied to.

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(OCTOBER 2014)**

Summary of Recommendations

The GOABC seeks a fair and reasonable Harvest Allocation Policy, which provides the industry with equitable access to its share of the wildlife resource. As set out above, the new Harvest Allocation Policy has led to unintended financial consequences in our industry. Implementation of the proposed recommendations would be revenue-neutral for government and would have negligible impact to the average resident hunter.

The following is a summary of recommendations to provide a fair resolution to the new Harvest Allocation Policy:

1. Legislated splits at:
 - 60:40% (resident-to-outfitter) ratio for sheep, goat, and grizzly bear;
 - 98:2% (resident-to-outfitter) ratio for antlerless species; and
 - 75:25% (resident-to-outfitter) ratio for the remainder of 'Category A' species.
2. Mitigation of losses caused by the new Harvest Allocation Policy by immediately:
 - amending the *Wildlife Act* to allow for the direct awarding of vacant guide territories to impacted outfitters;
 - disbursing the fractional territories to guide outfitters who have lost quota; and
 - creating a 'mitigation trust' for the purposes of compensating affected guide outfitters.
3. Implementation of the new Administrative Guidelines as soon as possible.
4. We do not support managing wildlife by Population Management Unit at this time. After comprehensive analysis is completed, we would be happy to discuss changing the spatial scale to which allocation decisions are applied.
5. The AWG framework has identified some industry issues, and we request that matters relating to the administration of the industry allocation be moved to bi-lateral discussions between the GOABC and government at a later date.

A decision that follows these recommendations would allow the guide outfitting industry to further contribute economic and tourism opportunities in rural British Columbia communities. In addition, bringing closure to this matter would allow all parties to focus their attention on important wildlife and habitat matters.

Please call 604-541-6332 or e-mail ellis@goabc.org if you have any questions.

Sincerely,



Scott Ellis
Executive Director



Brian Glaicar
President

cc: Shirley Bond, Minister of Jobs, Tourism and Skills Training & Minister Responsible for Labour; Bill Bennett, Minister of Energy and Mines & Minister Responsible for Core Review; Donna Barnett, Parliamentary Secretary for Rural Communities and Development to the Minister of Community, Tourism, Sport and Cultural Development; Mike Morris, M.L.A.

**MINISTRY OF FORESTS, LANDS AND NATURAL RESOURCE OPERATIONS
INFORMATION NOTE**

Date: October 22, 2014
Date of previous note: October 1, 2014
File: 280-20
CLIFF: 209743

PREPARED FOR: Honourable Steve Thomson, Minister of Forests Lands and Natural Resource Operations

ISSUE: Guide Outfitters Association of BC (GOABC) is meeting with Minister Thomson on October 27, 2014 to discuss the Wildlife Harvest Allocation Policy Review outcomes.

BACKGROUND:

At the end of September 2014, the Wildlife Harvest Allocation Policy review was completed and sent to Minister Thomson for decision. As part of this review, the key stakeholders were given the opportunity to submit their final position on the outcomes of the review. The meeting with GOABC on October 27, 2014 is meant to be a discussion with them on their position of the review as articulated in the letter sent October 17, 2014 (attachment 1). There is also a meeting being held between GOABC and Minister Bennett and information was also requested by Minister Rustad in response to the GOABC letter being copied to him.

DISCUSSION:

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In the October 17th letter from GOABC they mention the following additional items of concern:

1. *“The proposed package does not mitigate the financial impacts to our sector.”*

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2. *“The BCWF is seeking legislative splits that would see the resident hunters share increased, above current allocation levels.”*

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3. *“Mitigation to guide outfitters for loss of quota, through the direct awarding of fractional territories, and/or compensation/retraining through an established mitigation trust needs to be implemented as soon as possible.”*

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4. *“Increased flexibility in the Administrative Guidelines to better allow the ability to harvest the 5-year quota.”*

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CONCLUSION:

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Contact:

*ADM: Tom Ethier
Div: Resource Stewardship
Phone: 250-356-0972*

Prepared by:

*Name: Diane Nicholls
Div: Resource Stewardship
Phone: 250-387-1544*

Reviewed by	Initials	Date
DM		
DMO		
ADM	TE	October 23, 2014
PRGM Dir./Mgr.	DN	October 22, 2014