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OFAH MEMBERSHIP

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November 22, 2024

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SUBJECT: ERO# 019-7813 - Proposed enhancements to the points-based moose tag allocation process for resident hunters

The Ontario Federation of Anglers and Hunters Membership is Ontario's largest, non-profit, fish and wildlife conservation-based organization, representing 100,000 members, subscribers, and supporters, with over 700 member clubs. Thank you for listening to the moose hunting community and proposing improvements to the system. We have discussed the proposed changes with a wide variety of moose hunters via multiple channels, including social media, phone calls, emails, and through our province-wide network of directors. The feedback that we have received supports changes to the tag claim deadline and the implementation of a third allocation step, but there is general opposition the first change.

Since the introduction of the points-based moose tag system, OFAH Membership has been listening to moose hunters and wildlife policy experts, discussing and reviewing the system to learn where weaknesses lie and where improvements can be made to the benefit of moose hunters and general moose management.

We previously expressed our concern about the number of unawarded and unclaimed moose tags in our letter dated November 15, 2023. Unclaimed tags result in missed hunting opportunities and contribute to the loss of potential revenue to the Special Purpose Account that supports the fish and wildlife program. As such, the issue of unawarded and unclaimed tags has been a top priority of the OFAH Membership.

It is impossible to completely eliminate unclaimed moose tags, as some tags are simply undesirable to moose hunters (e.g. calf tags, remote areas). The best we can hope for is to minimize them, particularly in-demand tags for which there are hundreds of other applicants (e.g. gun bull tags).

Proposed Changes

1. *Any hunter awarded a tag based on their first choice in the 'second chance allocation' will forfeit their points, whether or not they decide to claim the tag.*

As mentioned, there is significant (but not total) opposition to this aspect of the proposal in the moose hunting community.

This change does not adequately consider the variable point distributions that exist within hunting groups and would benefit some groups at the expense of others. For large groups with a wide range of point totals (from high to low), this change will be neutral because a hunter with many points would be reasonably certain of obtaining a tag in the second chance/first choice. But many hunting groups are relatively small and/or made up of hunters with the same or similar point totals. These groups will be negatively impacted by this change. In the second chance allocation, some tags will be awarded by random draw (i.e. tiebreaker) because there are more applicants with the same point total than tags available. As such, many groups will attempt to maximize their chances of receiving a tag by having multiple people apply in the second chance allocation (especially if they were not awarded a tag in the primary allocation). This is particularly true in core moose range where a lot of hunting activity is directed and in units that have experienced significant tag reductions in the last ten years.

The primary benefit of proposed change #1 would be to drive down minimum points required (MPR) more quickly. While we understand the intention of this change is to influence application behaviour so hunters only apply for tags they intend to claim, there is no guarantee that the change will have the desired effect. For instance, some hunters have told us that they would claim any/all tags awarded at this stage - "if I'm going to lose my points either way, I'd rather have something to show for it." In those cases, there will be no improvement to the distribution of tags (even if there is a reduction in the number of unclaimed tags).

It is important to note that a third allocation stage, if implemented as proposed, would make this aspect of the proposal unnecessary.

2. *Advance the tag claim deadline of the second chance allocation to be prior to the opening of moose seasons.*

We support this change as a prerequisite to the addition of a third chance allocation stage. With a compressed timeframe for successful applicants to claim a tag in the first two allocations, a third round of the tag system could be introduced.

3. *Create a new 'last chance allocation' step in the process, where any unclaimed and unawarded moose tags would be made available for purchase by resident hunters.*

While details of the last chance allocation are not available at this time, we support the creation of a final step that facilitates the claiming of desired tags by moose hunters. The previous first-come first-served surplus moose tag system was polarizing, and we recommend the government develop a better system that addresses the many complaints received about the previous system.

Group Applications

There continues to be broad support within the moose hunting community for the reintroduction of group applications. As we all know, many moose hunters hunt in groups and most groups do not want to draw more than 1 or 2 tags per group. Returning to a group application will further the goals of expanding opportunities to more hunters - following the primary allocation stage, many groups will have been awarded a tag, resulting in many additional names being taken out of the process and opening the system to a wider applicant pool during the secondary and third allocation stages. We have received a variety of ideas for how to implement a group application system and would appreciate the opportunity to discuss this recommendation in more detail with the appropriate staff.

Ongoing Review

The points-based tag system is still relatively new, and challenges remain to make it a streamlined process that is fair and works for everyone. Addressing the problem of unclaimed tags is a crucial step towards the improvement of the system, and we applaud the MNR on focusing on fixing this unintended flaw. The OFAH Membership will continue to receive feedback from moose hunters and consult on ideas that could further contribute to the solutions needed to address system issues. We strongly believe in making sure no hunting opportunities are lost, while ensuring moose hunting remains a sustainable activity with a well-managed moose population in Ontario.

Thank you for listening to the moose hunting community and proposing changes to address their concerns about unclaimed moose tags. We appreciate the opportunity to provide our comments, and we look forward to further discussions on moose management.

Yours in Conservation,



Mark Ryckman
Manager of Policy

cc: OFAH Membership Board of Directors
OFAH Membership Big Game Advisory Committee
Matt DeMille, OFAH Membership Executive Director
OFAH Membership Policy & Programs Staff