

Wildlife Restoration/Hunter Education Advisory Team



Advisory 2020-015: Wildlife Harvest Donation\Processing Cost – Wildlife Restoration
July 21, 2020

Question: Can a State fish and wildlife agency develop a program that passes through funding to eligible partners for the purpose of paying wild game processing and distribution costs to support field to fork programming and pay for it using Wildlife Restoration Act funds under the category of: "hunter recruitment and recreational shooter recruitment" means any activity or project to recruit or retain hunters and recreational shooters, including by— (A) outreach and communications as a means— (iv) to promote conservation and the responsible use of the wildlife resources of the United States?

Background:

The “field to fork” movement has provided State fish and wildlife agencies with an opportunity to highlight the nutritional value of the game harvested through hunting activities. There appear to be additional flexibilities afforded under the Modernizing the Pittman-Robertson Fund for Tomorrow’s Needs Act (Modernizing PR Act) that would allow State agencies to promote conservation and the responsible use of wildlife resources through enhancements of “field to fork” activities. An example might be: Hunters Helping the Hungry has long supported the concept of harvesting game through regulated hunting as a responsible use of wildlife. Hunters Helping the Hungry has further enhanced the image and value of hunting by using donations, both cash and vendor services, to pay for the processing and distribution of game to individuals through non-profit organizations. Some grants include “creating field to fork programming” as an approved activity. The question asks if a State may use funds under 16 U.S.C. 669c(c) or 16 U.S.C. 669h-1 to develop partnerships with organizations that “promote conservation and the responsible use of wildlife resources” under 16 U.S.C. 669a(3)(A)(iv).

Discussion: The specific question is related to the narrative phrase within the Definitions at 16 U.S.C. 699a(3)(A)(iv) as amended by the Modernizing PR Act. All activities under the definition of “hunter recruitment and recreational shooter recruitment” are related to recruitment of hunters and recreational shooters. We are not aware of any research or findings that indicate wild game donation programs have any measure or effect on recruiting or retaining hunters or shooters, and cannot readily see a link between a grant approach and objective related to donation or sharing of wild harvested game as a recruitment tool or motivator. Perhaps future research could identify such a link, but none exists, and it is not apparent for an R3 strategy\activity.

In review of this activity (donating\sharing wild harvested game), we noted that a State may have high localized big game densities and a need for controlling selected populations with associated high bag limit per hunter (e.g., 10 deer), and has objectives to open lands (private and public) to facilitate hunting big game to control numbers to meet management objectives. Public support and understanding of hunting are important to facilitate access to ensure hunting pressure and harvest of big game to meet management objectives. There is an existing body of human dimensions

research that indicates the public overwhelmingly supports hunting for food (as opposed to “sport” or “recreation”). To meet management objectives to maintain viable habitat conditions and keep the deer herd in balance with management objectives, a food sharing\donation cost could be necessary and reasonable and considered eligible using funding at 16 U.S.C. 669c(b) (Traditional Wildlife Restoration). The relevant elements are to maintain public support for access of hunting, and to facilitate hunters continuing to pursue harvesting deer (within liberal bag limits), to facilitate further reduction in big game population levels in identified areas.

Advisory:

(1) We believe a State fish and wildlife agency could demonstrate that paying for wild game processing and distribution costs is necessary and reasonable and eligible using funds at:

16 U.S.C. 669c(b) (Traditional Wildlife Restoration).

These activities could facilitate big game harvest to meet management objectives in reducing populations and help maintain public support for hunting that is needed to keep or maintain regulated hunting as a viable management option in urban areas. This should be determined on a case-by-case basis. The State would need to demonstrate how the management objectives in the grant are achieved with this activity, and that the costs are necessary and reasonable to accomplish the overall purpose and objectives of the grant.

(2) We believe this activity is ineligible using funds at:

16 U.S.C. 669c(c)(4) (Basic Hunter Education or R3) for R3 activities, or
16 U.S.C. 669h-1 (Enhanced Hunter Education/R3)

as such activities have not been shown to be successful in recruiting and retaining hunters or recreational shooters.