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# INTERIM BIG GAME OUTFITTING LAND TENURE POLICY

LAND RESOURCES DIVISION, DIAND

October **21**, 2002

~~Final Draft~~

Latest

**TITLE**

Interim Big Game Outfitting  
Land Tenure Policy

**APPLICABLE TO**

Territorial Lands in Yukon  
(As defined in the Territorial Lands Act)

**PURPOSE**

The purpose of this interim policy is to prescribe the conditions under which land may be leased for big game outfitting camps or licensed for related airstrips.

**REFERENCES/AUTHORITIES**

Territorial Lands Act  
Territorial Lands Regulations  
Canadian Environmental Assessment Act  
Federal Real Property Act  
Federal Real Property Regulations

**BACKGROUND**

Big game outfitters have historically used their campsites on an informal basis. Many sites are being used without associated land tenure. Management of land resources requires that use of the land be reviewed and that tenure be provided where appropriate. Accordingly, land will be provided for those sites where such facilities are regarded as appropriate.

This policy does not apply to Commissioners or Settlement Lands or to National Parks.

By interim it is meant that the policy will apply until a commercial wilderness policy is developed post devolution. At that time, the BGO policy will be reviewed to ensure that the policies are complimentary.

Land Resources Division must provide tenure in order to support the outfitting industry, to manage outfitting activity on camp sites and to facilitate management of unauthorized occupancy.

The Department of the Environment, Yukon Government is responsible for the management of wildlife and inland fisheries on territorial lands. That department issues concessions for big game guide outfitting which provide the right to guide non-resident hunters within concession areas.

Yukon First Nations are responsible for the management of land and resources on Settlement Lands and participate on the Federal Territorial Lands Advisory Committee (FTLAC) that advises DIAND regarding the disposition and management of territorial lands.

#### PRINCIPLES

- Land tenures provided for big game outfitting are tied to concessions provided under the Yukon Wildlife Act.
- Land tenures authorized under this policy do not imply an interest or allocation of fish or wildlife resources.
- Lands for activities based on the use of natural resources (including resource extractive, industrial and resource commercial uses) will be made available by lease or licence.
- Public access will be maintained on territorial lands for public recreation and other resource users.

Use of fish and wildlife is managed under Yukon Government legislation. Land tenures issued under this policy, do not convey an interest in or allocation of fish and wildlife resources.

In order to manage land resources effectively, the Federal, Territorial and Yukon First Nation governments need to review applications in a coordinated manner. FTLAC provides a forum for government and public review of applications.

***Following devolution applications under this policy will be reviewed by the Yukon Government's Land Application Review Committee (LARC).***

Only sites that are necessary to the operation of the outfitting concession can be applied for under this policy. If a concession is cancelled, land tenures associated with that concession shall also be cancelled.

In recognition that Yukon hinterland areas are a shared resource, activities based on the use of natural resources are made available only by lease or license. It is generally recognized that commercial operators should be able to restrict access to camp facilities in order to protect their business investment.

## **DEFINITIONS**

### **Outfitting Concession**

Outfitting Concessions convey a limited right to outfit hunters in a designated area. They are granted under the Yukon Wildlife Act.

### **Base Camp**

A main location for an outfitting operation. Facilities may include a lodge or cabins and other related improvements.

### **Secondary Camp**

A camp that is ancillary to a base camp and is used for temporary accommodation during guiding excursions. Typically, facilities may include improvements such as tent frames, simple cabins, corrals and caches that are not completely removed at the end of each season.

### **Federal Territorial Lands Advisory Committee (FTLAC)**

The mandate of the FTLAC is to co-ordinate mutual action and the exchange of information between the Federal and Territorial and First Nation Governments with respect to the administration of territorial lands including the review of policy and regulatory proposals. FTLAC is an advisory body to the Land Resources Division, DIAND.

### **Land Application Review Committee (LARC)**

*The mandate of LARC is to provide a forum for the technical and interest-based review of land management matters including applications for land and policy development. LARC is advisory to Lands Branch, Yukon Government.*

*This policy is being developed by the Land Resources Division, DIAND using FTLAC as the forum for intergovernmental and public consultation. The policy will be implemented by the Lands Branch, Resource Management Division, Yukon Government using LARC as the forum for the review of applications.*

Lease

A lease is a contract which grants the lessee the right to possess, use and enjoy a site for a specified period. It is the standard form of tenure for the authorization of land for resource commercial operations, e.g. big game outfitting camps, where permanent facilities including cabins, lodges, and docks (water lot lease) are being constructed.

License

A licence conveys a limited right to carry out specified activities e.g. airstrips, but does not provide exclusive use of the land to the licensee.

**POLICY**

**A. FORM OF TENURE**

1. A lease is the form of tenure that will be provided for base and secondary camps in remote areas. A water lot lease will be provided for docks. It is proposed that all campsites and docks be included, by schedule, under one head lease.
2. *A secondary camp may also be authorized under a license where overlapping or conflicting land uses preclude authorization of a camp site under a lease.*
3. A licence is the form of tenure that will be provided for airstrips, authorized in association with remote camps. It is proposed that all authorized airstrips be included, by schedule, under one licence.

The single lease/license approach keeps outfitters costs in line with value and is an administrative convenience for all parties, including those who want to review applications.

A license does not provide exclusive use so facilitates multiple use. Provision of a license facilitates management of the activities on the land over an extended period.

**B. TERM OF TENURE**

1. Leases will be up to 10 years and will coincide with the term of the outfitting concession.
2. Licences for authorized airstrips or campsites will be for up to 10 years and will coincide with the term of the outfitting concession and head lease.

**C. SIZE OF TENURE**

1. Size of leases will be as required to accommodate existing or planned facilities as per application.
2. Size of licenses will be as required to accommodate planned facilities.

**D. COST OF TENURE**

1. The annual lease fee will be not less than 10%, of the total appraised land value for all lands described in the lease.
2. The annual license fee will be not less than 10%, of the total appraised land value for all lands described in the licence.

**E. SITE SELECTION CRITERIA**

1. Only those sites that are necessary to the operation of the outfitting concession, may be applied for under this policy.
2. *Sites existing as of the effective date of this policy may be applied for under this policy. Sites required to replace sites lost in land claim processes or as a result of environmental assessment processes eg. sites moved from the*

Leases and licenses will be for the remaining period of the concession and for the term of the concession thereafter.

Parcel size will be addressed on a case by case basis in relation to the operations and site plans, environmental conditions and other resource values, use and management issues.

The Territorial Land Regulations specify that annual lease fees will not be less than 10% of appraised value. *Appraisers are being contracted to provide standard values for different types of camps. Eg. Base, secondary; remote, close to highway or community; on lake or river, not on water. DIAND will coordinate with the Yukon Government on the process to establish appraised value. Outfitters will be consulted prior to establishment of standard values.*

*February 1, 2003 is targeted as the effective date for this policy.*

**30.48 set back may also be applied for.**

3. Historic use of campsites will be considered in the review of applications.
4. Lands are disposed of only in an amount reasonably necessary to satisfy the purpose for which the land is needed.
5. Airstrips may be licensed where required as outlined in the application and operations plan and on the determination that there is no alternative means of access. Alternative means of access may include a body of water capable of supporting floatplane access, an existing airstrip in the area, or a practical surface route. Applications will be considered on a case by case basis.
6. Applications for guide outfitter camps and airstrips will normally be within the applicant's concession area.

**F. ENVIRONMENTAL PROTECTION CRITERIA**

1. Applications will be reviewed to assess the potential for environmental impact and to determine mitigation measures where required.
2. Leasehold parcels will be set-back a minimum of 30.48 metres from the ordinary high water mark (OHWM) except in exceptional circumstances e.g. where topography limits building construction and public access is not unduly constrained. *The public reserve may be increased where a greater setback is required due to terrain vegetation, fish, wildlife, cultural or*

Exceptions can be made where logistics require access facilities outside of concession areas. The neighboring concession holder would be consulted in the event an application is made in their outfitting area.

The setback is intended to protect water quality, to facilitate public access on shorelines and to help maintain the public and wilderness character of the Yukon's remote lakes and rivers.

*scenic values.*

3. Camp sites will be set back a minimum of 10 metres from creeks, or such greater distance as environmental conditions or *other land uses* may require.

**G. RESOURCE MANAGEMENT CRITERIA**

1. Unique or representative landscape features, environmentally sensitive areas, archaeological and historic sites will be retained for public use rather than alienated for exclusive private use.
2. Sites needed to accommodate public access to and use of land or water resources will normally be retained for public use rather than alienated for private use.
3. Applications will be reviewed to ensure that the needs of other wilderness resource users are considered in an equitable manner.
4. Consideration will be given to the need for both spatial and temporal separation between wilderness resource activities in order to avoid conflict and maintain a wilderness experience.
5. Applications under this policy will comply with approved land use and resource management plans where applicable.
6. As a general rule, lake or river frontage shall not exceed 25% of the overall parcel boundary.

Resource management concerns will be identified in the government referral and public consultation process on the application.

*Public participation in the application review process will be important in ensuring that the needs of other resource users are not overlooked in the application review process. The field knowledge of Resource Management Officers and Conservation Officers as well as the outfitters themselves will also be important sources of information in assessing the relationship between outfitters and other resource users. The goal is to be equitable and to avoid ongoing resource use conflicts.*

This criteria is intended to minimize the impact on public access on lakes and rivers and to protect the wilderness character. Exceptions can be addressed on a case by case basis.

7. Leases/licences may be cancelled if development is not undertaken in accordance with the terms and conditions of the tenure granted.

## **PROCEDURES**

### **A. APPLICATION REQUIREMENTS**

- 1. *Applicants must fill out an Application Form as shown in Appendixes I & II. The application should be made in the name of the business or business owner.***
2. Applications must include:
  - i. a copy of the outfitting concession Certificate issued to the **business owner** by the Department of Environment, Yukon Government;
  - ii. *a list of all existing leases and applied for sites (see appendix I);***
  - iii. a 1:250,000 scale map of the concession area showing the location of all existing and proposed base camps, secondary camps, docks and airstrip sites;
  - iv. *a completed Big Game Outfitting Camp Site Information Form for each site being applied for (see Appendix II);***
  - v. a 1:30,000 scale map showing the location of each individual camp site and airstrip (for attachment to Appendix II);
  - vi. a detailed site plan, drawn to scale, showing the location of each camp site relative to adjacent landscape

*The application form has been modified to reflect the blanket lease approach ie. One page for general information and individual information pages for each camp site.*

*Land Resources Division will assist applicants transfer information from their 1:250,000 scale maps to a map for application review purposes.*

*Outfitters requiring assistance with their application may contact Sheila Smith, Carolyn Carruthers or Roger Horner, Land Resources Division, DIAND.*

features and the layout of facilities for each camp and airstrip (for attachment to Appendix II);

*vii. recent photographs (within 2 years) showing each camp site and existing facilities (photographs taken from the air are preferred);*

3. The applicant must ensure that the boundaries of the site are clearly marked on the ground to enable ongoing identification of the site. A legal survey of sites will not be required unless there is potential for conflict with other land uses.

#### **B. APPLICATION REVIEW PROCESS**

1. Land for big game outfitting camp sites will be made available by direct offer in response to individual applications.
2. *Applications will be reviewed at special LARC meetings scheduled in the spring and fall 2003 and following spring and fall until a final outfitting land tenure policy is completed.*
3. Applications received before July 1992, currently on hold, will be reviewed on a priority basis (once updated). Applicants will be informed of this policy and provided an opportunity to update their applications in order to ensure that all application requirements, under this policy, are met.

*Resource Management Officers and Conservation Officers may be contacted for recent photographs where an operator doesn't have one.*

Applications will be reviewed using the principles, policy statements and procedures established in the final policy to determine the suitability of the lands applied for. Applications are reviewed in an open process.

*Outfitters with existing applications may contact Land Resources staff for assistance to transfer information from existing applications to the new forms.*

4. Prior to April 1, 2003 applications should be sent to:

Head, Land Dispositions  
Land Resources Division,  
Northern Affairs Program, DIAND  
320 - 300 Mains Street  
Whitehorse, Yukon  
Y1A 2B5

*On and after April 1, 2003 applications should be sent to:*

*Manager, Land Disposition & Client Services K-16  
Resource Management Division  
Energy Mines and Resources  
Yukon Government  
345 – 300 Main Street  
Whitehorse, Yukon  
Y1A 2B5*

5. Applications are reviewed for completeness.
6. *Complete applications will be put on a LARC meeting agenda and circulated to the LARC Distribution List thirty days prior to the meeting date. The LARC agenda is advertised in local newspapers fourteen days prior to meetings.*
7. *The Fish and Wildlife Branch, Yukon Government will review the application to confirm that the sites applied for are existing and are required for the operation of the concession.*
8. Applicants may request to make personal representation to LUAC.

**9. Members of the public may send comments in writing to the Manager Land Dispositions & Client Services for consideration by LUAC or request to make personal representation to the LUAC meeting.**

**10. Upon reviewing all information from the applicant, government agencies, Yukon First Nations and the public, LUAC makes a recommendation to the Director, Lands Branch, Resource Management Division, Yukon Government.**

**11. LUAC minutes are provided to LUAC members.**

**12. Applicants are notified of the decision, in writing, by the Director, Lands Branch, Resource Management Division, Yukon Government.**

*BGO Policy in columns Oct 21, 02*

**Federal Territorial Lands Advisory Committee  
Fireside Room, Yukon Inn  
May 2, 2002**

**INTERIM BIG GAME OUTFITTING POLICY  
Questions and Answers**

- 1. Will applications for new sites, ie. sites that have not previously been used for big game outfitting, be accepted under this interim policy?**

The Interim policy is focusing, first and foremost, on authorizing existing sites with permanent facilities and secondarily on existing sites without permanent facilities. It proposes to do this under a single blanket lease. It was agreed at the May 2<sup>nd</sup> meeting that further consideration would be given to the review of new sites under three conditions. 1. Where land claim negotiations necessitate a move by the outfitter into a new area or 2. Where wildlife resource managers and Renewable Resource Councils are requesting outfitters to move into new areas to reduce hunting pressure in areas used by First Nations and resident hunters. 3. Where existing sites located in the 30.48M waterfront reserve cannot be moved back to the adjacent upland area. It was also said that outfitters may be asked to move their harvest to shift hunting pressure out of protected areas and to comply with environmental assessment processes.

Further discussion with Department of Environment, wildlife resource managers indicates that some of requests to move outfitters into new areas are in response to outfitter requests for increased harvest rather than relocation of existing harvest. It was suggested that in order to simplify the Interim policy that a cut off date be included in the policy and that the policy also allow for replacement of sites lost to land claims and environmental assessment processes. This would include sites located in the 30.48 meter setback or precluded by limitations imposed by protected areas. The effective date of the policy, targeted for February 1, 2003, is proposed as the cut off date.

- 2. How can detailed information on the hunting activity be kept relatively private and still allow for a fair public and government review of applications?**

It was proposed that the Environment Department, Wildlife Managers/Conservation Officers be requested to make a recommendation to FTLAC, on the application, based on information which is provided to them by outfitters but which is not normally made public.

It was noted that this approach is similar to the Agricultural Branch application review process for farm land. The application is made public but the Farm Development Plan is reviewed internally by a Farm Development Officer who determines if the Plan is satisfactory. It was agreed that this approach would be explored with the Environment Directorate and incorporated into the next draft of the policy.

The October draft policy states, under Application Review Process, that the Fish and Wildlife Branch, Yukon Government will review applications to confirm that sites are

existing and are required for the operation of the concession. The application form requests general information on the period and amount of use and means of access for each site.

While it was recognized that FTLAC is the forum for Renewable Resource Councils to provide input to outfitter camp applications, it was also suggested that direct communication between outfitters and RRCs would help RRCs to understand where they were coming from. The possibility of an annual meeting with outfitters and representatives from RRCs was raised.

**3. Can applications under this policy be reviewed twice a year rather than every month?**

It is proposed that special FTLAC/LARC meetings be scheduled for the spring and fall of 2003. This approach will facilitate public notification and involvement in the application review process. It will create an opportunity for outfitters to submit/update applications right away or to prepare applications for the fall review. It will also facilitate a concerted effort by government departments to address the back log of applications.

**4. Camps indicate the location of hunting activity. How can outfitters confidentiality regarding the location of sites be protected?**

The location of all land tenures are shown on land tenure maps in order to facilitate land management. The locations are marked with a number and do not indicate the use. Government agencies and the public must ask to see a file in order to confirm the type of use at a particular site. Outfitters may choose not to apply for a lease for a camp site where there are no permanent improvements.

**5. What lease fee values have been established for outfitting sites?**

Land Resources Division is currently in process to contract with appraisers to make an informed decision and will coordinate this process with the Yukon Government. Outfitters will be consulted on the valuation of sites.

**6. How will the policy address the possibility that outfitter sites may be used for purposes other than big game outfitting?**

This concern is addressed in the policy and the lease document. Under Site Selection Criteria it is specified that only sites necessary to the operation of the concession may be selected under this policy. Under the Application Review Process, members of the public may send comments or make personal representation to FTLAC should there be concerns regarding the use of specific/existing sites. Additionally, the lease document indicates that camps may be used for big game outfitting purposes only. Therefore, an outfitter puts their lease in jeopardy if they use it for purposes other than outfitting.

The interest of outfitters and other land tenure holders to diversify will be considered when we begin discussion of the commercial wilderness policy.

In discussions with outfitters, it was noted that one operator has periodically allowed a mining exploration company to base its seasonal activity from its camps. This non tourism related activity would seem to be in keeping with the principle of multiple use as it reduces short term impacts on the environment. Policies and procedures to facilitate multiple use of sites will require further consideration in the development of the final big game outfitting and commercial wilderness policies.

7. **Once an outfitter has tenure for outfitting, will he/she also be able to apply for commercial wilderness use at his outfitting camps?**

This question will be discussed when the commercial wilderness policy is developed following devolution. It is also an important question for trappers and other land tenure holders in remote areas including people with cottage lots and rural residential holdings. It may be necessary to consider a commercial wilderness licencing mechanism that is separate from the land tenure agreements since most of the activity and impact occurs off site.

8. **How were the existing big game outfitters leases issued?**

Existing leases were issued under the Land Resources Division, Land Disposition Policy. That policy established categories under which land dispositions could be made ie. residential, commercial (including highway and resource commercial) and industrial/manufacturing. Guide outfitting, trapping and commercial wilderness were identified as resource commercial land uses. The policy contained no criteria to address resource management issues or the relationship to other commercial wilderness activities. With the increase in commercial wilderness activity in the early '90s, this policy was thought to be inadequate to manage the land disposition process for big game outfitting and commercial wilderness purposes.

9. **The policy says that public access will be maintained. Does that mean that every site that comes under this policy will be open to the public?**

No, a lease provides exclusive use. However, the needs of the public and other commercial resource users for access in the back country will be considered in the application review process. The intent of this review is to facilitate multiple use and to avoid situations that create ongoing land use conflicts.

If access to a particular site/access point (lake, river or upland feature) is required by an outfitter and the public at different times of the year, (eg. in situations of limited access), a license may be a more appropriate form of tenure.

If a lease is allowed in the 30.48 M waterfront reserve (normally a historic lease) it is only done with the proviso that public access is allowed.

- 1 6. **With the substantial investment that occurs at certain places, why can't outfitters apply for an agreement for sale rather than just a lease? This would facilitate consolidation of big game outfitting activities and commercial wilderness activities at the same site and reduce impacts on the environment. We are being told by government to diversify but are not being provided a process to do it. This needs to be discussed.**

Governments pursue a lease only policy in remote areas to facilitate their ability to manage in the public interest over the long term where multiple public uses occur and are subject to change based on development pressures and changing social and cultural values. Discussion of this question involves consideration of many factors including land use planning and zoning. It is not possible to fully consider this question in the context of an interim land tenure policy for outfitting camps.

- 1 7. **YTG Renewable Resources has prepared a draft Yukon Shoreline Guidelines. Can we look at this document for guidelines on setbacks?**

The Yukon Shoreline Guidelines specify a minimum 30.48 M setback from shorelines and also allows for increased setbacks where required due to terrain, vegetation, wildlife, fish, scenic or cultural values. This provision has now been incorporated directly into the policy under the Environmental Protection Criteria section.

12. **Will outfitters be allowed to attend FTLAC to defend their application?**

It is the practice at FTLAC to allow an applicant to make a presentation to FTLAC and to answer any questions the committee may have. As FTLAC is not a public meeting, the applicant needs to get the permission of the Chair. Normally, a time is arranged for the applicant to address the meeting.

Concern was expressed that questions may arise after the applicant has left the meeting and that lack of information results in the deferral of an application. It was suggested that the applicant could be invited to stand by while FTLAC reviews the application so they could be asked for clarification if further questions arise in the discussion of the committee.

## Ella.LeGresley

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**From:** Ella.LeGresley  
**Sent:** Wednesday, October 23, 2002 11:29 AM  
**To:** 'hornerr@inac.gc.ca'  
**Cc:** Shirley.Abercrombie; Bryony.McIntyre; Lyle.Henderson  
**Subject:** Interim BGO Policy - Oct. 21 draft

Hi Roger,

Thanks for the latest draft of the BGO policy you sent yesterday morning. There's not enough time to circulate it to the resource folks in EMR before your need for comments by today, but I did find some comments on file from Marg Crombie in the e-mail below that arose from my last attempt to engage the resource folks in this matter. I apologize for not providing this earlier. Note that Marg's comments are not concerns from an oil and gas perspective, but rather are around the clarity of the language used, and I note she does say to feel free to pass on or ignore, but I'll leave it up to you. I did check with Bryony on Marg's comment on Cost of Tenure and Fee Schedule and Bryony advised the fee schedules do mesh together, so you can ignore Marg's last comment.

### Page 2 - Background

See Marg's comment below.

### Page 3 - Principles

See Marg's comment below.

### Page 6 - E. Site Selection Criteria

Note that Harvey Jessup suggested reversing the order of the first two items. Further to this, I don't think the language "lost in the land claims processes" should be used. Please note that EMR does not serve as expert on such language, and I haven't had the time to consult with our Land Claims and Implementation Secretariat. I can suggest "Sites required to replace sites that have become or are proposed as First Nation Settlement Land or as a.....", but you may want to consult Federal Claims & Indian Government on this matter.

### Page 8 - G. Resource Management Criteria

I have put this title in bold print as this is probably EMR's most important comment area. First I'll note that I think the new, additional explanatory comments in the right column are very good, and I'd like the policy text to better reflect the described intent. We've made comments about this section before but I don't think the current language addresses the concern. Items 3 and 4 refer to other wilderness resource users and wilderness resource activities. I am concerned that these terms could be interpreted to exclude economic resource users. For Item 3, I suggest either dropping the word "wilderness" or adding "....other wilderness and **economic** resources users....".

For Item 4, I suggest dropping the first "wilderness" term and adding additional words at the end of the sentence. The revision would be "Consideration will be given to the need for both spatial and temporal separation between resource activities in order to avoid conflict and maintain a wilderness experience **and access to economic resources.**"

Another minor suggestion for Item 6 would be the addition after the end of the sentence of (i.e. 1:1 frontage-depth ratio). This might further help explain the concept.

All for now, Roger, except to say thanks for your efforts to address our concerns. Next I'll have a look at the Q & A you sent yesterday.

Ella.

-----Original Message-----

**From:** Marg.Crombie  
**Sent:** Thursday, April 18, 2002 11:23 AM  
**To:** Ella.LeGresley  
**Cc:** Tammy.Allen; John.Masterson  
**Subject:** Interim Big Game Outfitting Land Tenure Policy

Ella: I don't have any concerns relative to this draft interim policy from an oil and gas perspective, but I do have a few comments, mainly around the clarity of the language used. feel free to pass on or ignore.

#### P. 4 - Background

- The statement that management of land resources requires that tenure be provided where appropriate appears to be more prescriptive than it need be. Similarly language that Land Resources will provide territorial lands where such facilities are regarded as appropriate appears to be pretty prescriptive. However I have no suggestions for alternative wording.
- In the right hand column, I would recommend that they flip this around slightly to say that "The provision of land tenure shows support for the outfitting industry, allows for the management of outfitting activity on camp sites and facilitates the minimization of unauthorized occupancy". I believe this says basically the same thing, but in a less prescriptive manner. Maybe something similar could be crafted for the left hand column.

#### P. 5 - Principles

- the third principle is not clear. I assume from reading the rest of the document that they are trying to say that land tenure authorized under this policy will be by lease or license. When I first read it I was not sure if they were trying to say that lands for other resource activities will continue to be made available or land tenure does not imply an interest in land outside of the sites tenure or what. As it was not accurate to say that all resource based activities are authorized by lease or license. There are also permits and other forms of authorization for gravel, land use, timber, mining, etc..

#### P. 8 - Cost of Tenure

- how does this fee schedule mesh with Yukon Government's Lands fee schedule (re trying to harmonize the fee structures post devolution)?

That's all from here. Thanks Ella. You get all the good ones I see.

Marg