

SUBMISSION TO IMPROVING WILDLIFE MANAGEMENT AND HABITAT CONSERVATION CONSULTATION



July 31, 2018

Introduction

The BC Government and Service Employees' Union (BCGEU) represents more than 77,000 workers in various sectors and occupations in more than 550 bargaining units throughout British Columbia. Our diverse membership includes direct government employees who protect children and families, provide income assistance to vulnerable individuals, fight forest fires, deliver care to people with mental health issues and addictions, administer B.C.'s public system of liquor control, licensing and distribution, staff correctional facilities and the courts, and provide technical, administrative and clerical services.

Our membership also comprises workers throughout the broader public and private sectors where members provide clinical care and home support services for seniors, a diverse range of community social services, highway and bridge maintenance, post-secondary instruction and administration, as well as other non-governmental industries, including financial services, hospitality, retail and gaming.

Nearly 5,000 BCGEU members staff the public agencies that are responsible for protecting B.C.'s environment and managing our natural resources — collectively known as the “dirt ministries.” These workers include biologists, forest technologists, check scalers, mining inspectors, park rangers, GIS analysts, oil and gas operations officers, conservation officers, First Nations relations advisors, water resource specialists, natural resource officers, environmental protection officers, administrative professionals and many more. The BCGEU also represents workers involved in resource management at the Freshwater Fisheries Society, two regional districts, the Wilderness Committee, and the Oil and Gas Commission.

These members are on the frontline of wildlife and habitat management in B.C. They are involved in planning, permitting, decision-making, research, education, advocacy, monitoring, and compliance

and enforcement related to wildlife management and habitat conservation. They know the issues, and they have practical solutions to offer.

In June and early July, we conducted a survey of these BCGEU members to inform the Union's submission to this consultation. We asked members to identify key issues and suggest ideas for change in wildlife management and habitat conservation in B.C. Based on our survey, and the concerns and stories brought forward by our members over many years, the following submission provides a brief, overarching response to the issues raised in your discussion paper. Throughout, we include the voices of our members.

The need for change

Several daunting challenges were identified in the discussion paper - limited community and stakeholder involvement, declining wildlife populations, habitat loss and fragmentation, a lack of good information on habitats and wildlife, and the need to move more seriously toward reconciliation with Indigenous people in relation to wildlife management and habitat conservation.

It is true that urban and industrial development have long had precedence over conservation in British Columbia. However, this dynamic has intensified in recent decades, as the former BC Liberal government set out to cut costs and staff, and to reduce ‘red tape’ in environmental and natural resource management. During the Liberals’ tenure, the needs of resource companies were prioritized, and environmental laws were weakened.

“Traditional extraction industries like logging, mining, oil and gas for many years have been given greater consideration than wildlife and habitat conservation, despite the many ecosystem services and economic contributions natural habitats provide.”

“I have witnessed Senior government management make decisions supporting industry, guide outfitters and private development in the absence of

information or consideration for the environment or wildlife concerns.”

“I’ve been attempting to manage the province’s wildlife for more than a decade. Unfortunately, in that time, I can’t think of one instance where we had the knowledge of some factor on the landscape negatively influencing wildlife that we were able to effectively address. More and more, our roles seem to be relegated to observing and measuring the decline in the province’s wildlife. It certainly hasn’t been to manage the limiting factors so that wildlife can prosper.”

As the BCGEU has repeatedly documented, the BC Liberals made deep staff and budget cuts to the public agencies responsible for protecting our environment and managing our natural resources. Across the dirt ministries between 2002/03 and 2016/17, staffing levels were reduced by almost one quarter (-23 per cent) or about 1,500 positions. Provincial spending on resources and the environment over the same time period was reduced by almost one third (-30 per cent). Not only was specific funding for fish and wildlife management reduced, the broader cuts impacted the overall work of the dirt ministries - compliance and enforcement, research, monitoring, planning, policy development, and capacity for working with First Nations — work that is critical for effective wildlife management and habitat conservation.

It is important to note the significant impact that the cuts have had on public servants working in this area. BCGEU members care deeply about managing the environment and resources in the public interest. To this day, our members contribute many hours of unrecorded overtime and expenses trying to continue work that their organizations no longer have the capacity to do effectively.

“There is a chronic lack of resources for resource managers for things like research, inventory, monitoring and planning.”

“Too often action for wildlife/fisheries management is not proactive enough, but to address this we need the data and staff/resources before entering some kind of crisis mode.”

“Wildlife and fisheries staff - particularly in the Ministry of Environment - are too often managing too much off the side of their desk without adequate supports.”

Combined with cuts to the public service, over the past two decades the drive to advance professional reliance in the resource sector has served to limit the amount of information and expertise housed within public agencies. Over time, the embrace of professional reliance served to foster a culture of deference to outside experts, and left significant resource and environmental planning, monitoring and decision-making functions in the hands of professionals hired by industry proponents, instead of public servants.

Organizational changes have also had an impact. The formation of the Ministry of Forests, Lands and Natural Resource Operations (MFLNRO) in 2011 moved the Fish, Wildlife and Habitat sections out of the Ministry of Environment (MoE) and into the new ‘super-ministry.’ With higher-level policy staff and the conservation officer service (COS) still in MoE, the move separated the branch from its strategic and enforcement arms. BC’s Auditor General recently noted this “organizational fragmentation,” concluding that “MoE and MFLNRO have an unclear organizational structure and unclear accountabilities for wildlife management.”

“You have a sector that has NO decision-making authority on the ground being tasked with managing fish, wildlife and habitat, how can that ever work?”

“...not one agency is responsible for the situation the caribou are in right now...and that’s part of the problem.”

Through our recent survey, BCGEU members identified habitat loss and a lack of resources within public agencies as the top issues in wildlife management in B.C. Along with other pressures like population growth and climate change, deregulation and a lack of public investment in proactive management have meant that important habitats have been degraded or lost, and there are many wildlife populations in decline. It is clearly time to change course.



Prioritizing wildlife and their habitats

We urge the provincial government to make a serious commitment to prioritizing and proactively managing for the health of ecosystems across BC, and to make legislative and policy changes that reflect that commitment. Compared to the past two decades, a more holistic and precautionary approach should be adopted going forward. In our survey, BCGEU members acknowledged that there are many competing demands on the province's land base, and difficult decisions about when, where and how to allow industrial and other activities will have to be made if we are to achieve improvements in wildlife management and habitat conservation.

"Tip the scales in favour of wildlife management. The scales have been heavily weighted towards industrial activity & urban growth since BC was created as a political space. You can't go from complete bias towards those things to "balance" without prioritizing wildlife affirmatively."

"We need better recognition of the vital ecosystem services provided by natural habitats for humans and wildlife. Natural landscapes are the basis for resource activities."

"Timber-centric bias still exists. We must change the narrative so that we value what we leave behind in the forest, not just what we take out."

"If the government is truly interested in protecting and managing our wildlife in the long term, hard decisions need to be made."

More specifically, BCGEU members told us that in terms of policy and legislative change, improving wildlife management and habitat conservation should involve:

- Strengthening protections for wildlife and habitats in environmental and resource legislation;
- Ensuring decision-making is transparent and based on scientific evidence;
- Adopting a precautionary approach;
- Establishing clear and measurable objectives for the protection of habitats and wildlife populations;

- Ensuring that rules are clear and readily enforceable on a proactive basis, especially in the case of the Forest and Range Practices Act (FRPA);
- Increasing consistency across different resource management regimes, so that all industries (mining, forestry, oil and gas, tourism, etc.) are working to the same high standards;
- Giving wildlife and other resource managers the appropriate tools and authority to deliver effective wildlife management;
- Establishing better mechanisms for landscape level planning and decision-making, including managing cumulative effects;
- Pursuing agreements with other levels of government (federal, municipal and First Nations) to ensure consistent and efficient wildlife management;
- Addressing the failures of the professional reliance model in the resource sector;
- Establishing stiffer penalties to deter violations and ensure fines are more than just a "cost of doing business"; and
- Expanding our parks and protected areas system to improve connectivity for wildlife.

"Quietly over the past decade, wildlife practitioners in the province have been directed to include politics into decision-making. This has inflated the importance of calculators and our reliance on them, while removing the conservative and more holistic approaches that past generations were able to use and thus buffer some of the pressures that our wildlife and landscapes face."

"The main issue is that wildlife values aren't managed for on the landscape. Wildlife continually takes a back seat to other resource values such as timber and range. It must become a value equivalent to these other resources, and in key areas they should be a top priority that guides land use decisions."

"Wildlife biologists don't have the influence necessary to manage the things that truly matter for wildlife."



“Ensure fines are substantial to deter action, not just be a cost of doing business.”

“We are doing a lousy job at considering the cumulative impact of the increasing density of land tenures on public land.”

“Creating more reserves and protected areas is always good policy, so long as they don’t have conditions attached to them that allow for industrial activity or activity that causes a decline in wildlife populations.”

Advancing Reconciliation with First Nations

In 2016, Canada adopted the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), with the BC provincial government promising to embrace and implement UNDRIP across all government ministries. The adoption of UNDRIP is a key step for fundamentally transforming the relationship between the provincial and federal governments of Canada and Indigenous peoples and is a long-awaited step toward reconciliation.

UNDRIP protects and upholds the rights of Indigenous peoples to the right of self-determination, protects the rights of cultural practice, and grants Indigenous peoples rights to decide for themselves how their lands are used and identifies full inclusion and free-prior informed consent (FPIC) as necessary before industrial activity can take place.

By putting UNDRIP into practice, there are opportunities for the provincial government to build upon existing relationships with Indigenous communities and governments and to strengthen collaboration on issues of wildlife management and habitat protection. To be effective, additional resources and capacity building should be prioritized to improve cultural competency in the public service, as well as improve hiring practices to bring more Indigenous peoples into the workforce.

“As it relates to wildlife, it is my hope that there will be more support for environmentally minded initiatives and aspirations of First Nations, and that traditional knowledge will be studied and respected.”

I would like to see the culture of care and connection with the land becoming more widespread.”

“Initiatives need to be actually soundly implemented with an Indigenous perspective rather than a paternalistic ‘we tell First Nations how’ approach. A good start would be completing an equity audit to actually see how many First Nations people we hire in the Province in the key positions of natural resource management, advising and relationship building.”

“This is a complex issue. Lots of consultation is needed to help and protect the culture and address lands issues.”

Organizational change

In terms of the public agencies that manage BC’s wildlife, there is a need for organizational change. As the Auditor General recently concluded in relation to grizzly bear management, there is an unclear organizational structure and unclear accountabilities. A number of BCGEU members echoed this concern in our recent survey.

Government should consider changes, including the possibility of moving the Fish and Wildlife Branch back into the Ministry of Environment, that can address these issues and support more effective wildlife management. In our view, however, a ‘standalone’ or ‘arms-length’ wildlife management agency is not the solution. Wildlife management and habitat conservation both affects and is supported by the broader work of our dirt ministries and beyond. Rather than creating a separate organization, existing agencies should be strengthened and better connected with one another. Bolstering the Ministry of Environment and Climate Change Strategy is particularly important going forward, given its mandate to manage and protect B.C.’s wildlife in the context of intensifying climate change impacts.

Perhaps even more importantly, a cultural shift must also begin within public agencies away from deference to the needs of resource companies towards a renewed focus on supporting sustainable development. The stewardship mandate of our public agencies must be reaffirmed, and the public re-established as their primary client. Transparent,



science-based decision making and genuine community and First Nations engagement must also be reaffirmed as being central to guiding Ministry operations.

Renewed public investment in wildlife management and habitat conservation

As already outlined, the agencies tasked with managing B.C.'s environment and natural resources were gutted by staff and budget cuts over the past two decades. Overall spending on resources and the environment remains well below levels from the turn of this century, accounting for just 2.4 per cent of the province's total budget (down from 4.1 per cent in 2002). The 'dirt ministries' and other agencies need more resources to effectively carry out important functions related to wildlife management, including research, monitoring, inventories, compliance and enforcement, community engagement, building relationships with First Nations, planning, policy development, and conducting effectiveness evaluations.

In short, meaningful improvements in wildlife management and habitat conservation cannot be achieved without renewed public investment. We urge the provincial government to provide the resources needed to restore the scientific and operational capacity of the public agencies that do this work, as well as setting aside funds for other conservation activities like land acquisition.

On this, the BCGEU is concerned about proposals to fund wildlife management based primarily on "user" fees or a "pay to play" model, since this approach can risk prioritizing the needs of some interest groups or particular species above the overall health of ecosystems. In our view, the well-being and future prosperity of all British Columbians depends on our ecosystems being healthy and resilient. As such, it is the provincial government's responsibility to directly fund the management of our public lands appropriately.

"Speaking from my unique position within Government, and after working in other jurisdictions, there is a huge

lack of good and decisive information available to make informed and well thought out decisions."

"I think that unauthorized use of no motorized areas, ie. snowmobiling in Caribou areas, is a big concern, but gov't does not have the resources to monitor and enforce the no go zones."

"In forests, important wildlife habitat is being harvested and there is no government oversight."

"There needs to be more boots on the ground and sea in order to check to see if people are abiding by rules and regulations when it comes to hunting and being in remote recreation areas that these animals call home."

"We need to protect more and a greater diversity of habitats while simultaneously putting more resources into research and education of the public."

On the engagement approach:

As the Ministry moves ahead with policy development in this area, we urge you to engage meaningfully with workers in the public service. Rather than relying exclusively on senior managers, understanding the perspectives and experiences of frontline Ministry biologists, conservation officers, forest technicians, and administrative personnel – just to name a few – can make an invaluable contribution to sound policy development and organizational change decisions that are both sensible and cost effective.

Further, going forward the Ministry's engagement on these issues should not be executed in isolation from related government initiatives. Revitalizing BC's environmental assessment process, renewing land-use planning, responding to the recommendations in Mark Haddock's professional reliance review report, building a climate action plan and developing species-at-risk legislation are all processes that will be integral to achieving improvements in wildlife management and habitat conservation.

On behalf of BCGEU members, we appreciate the opportunity to provide this submission to the Improving Wildlife Management and Habitat Conservation consultation.

