GRIZZLY BEAR FOUNDATION

July 30th, 2018

To: The Ministry of Forests, Lands, and Natural Resource Operations and Rural Development
Via email: wildlifeandhabitat@gov.bc.ca
Hard copy: PO Box 9391, Stn Prov Gov't, Victoria BC V8W 9M3

Re: Improving Wildlife Management and Habitat Conservation in British Columbia

Minister Donaldson,

We are grateful that the government is committed to improving wildlife management and habitat conservation in British Columbia. Your commitment to building a new framework to sustain and manage wildlife together with Indigenous peoples and a broad range of non government stakeholders is an important step to ensuring BC wildlife and habitat is here for future generations to enjoy.

As you move forward with developing our wildlife management and habitat conservation strategy, we offer our assistance and our best wishes for a plan that marries sound science, traditional ecological knowledge, and a comprehensive understanding of the threats and opportunities offered by our ever changing world. The primer indicates that Phase Two of participation will include analysis and collaborative policy development (fall 2018 to spring 2019). As the only organization solely dedication to the grizzly bear, one of our most iconic umbrella species, we wish to be consulted as a stakeholder, and as such would like to be involved in Phase 2 of this process. Additionally, we wish to be consulted as a stakeholder in the development of the upcoming grizzly bear management plan.

We have outlined the Grizzly Bear Foundation's opinion and position in response to the primer "Improving Wildlife Management and Habitat Conservation in British Columbia" in the bullet points below.

Challenge 1: How to increase the involvement of non-government conservation organizations as well as a broad range of wildlife and habitat stakeholders and the general public in wildlife management and habitat conservation.

Discussion Q 1: What programs and policies are most important to advance meaningful and lasting reconciliation with Indigenous peoples and help implement UNDRIP?

- **Consensus-based decision making:** The above question is perhaps best posed to Indigenous nations as we cannot speak to what would be most important to advance meaningful and lasting reconciliation, however we believe it is important that First Nations be approached nation to nation as the first step. Their governments should be included in the decision making process in conjunction with the Province of British Columbia.

- **Guardian programming**: Indigenous Guardian programs are enormously important and allow for self-determined wildlife management and habitat conservation planning on traditional territories, with proven social return on investment[1]. Increased accessible funding for these types of programs,

[1]https://www.indigenousguardianstoolkit.ca/community-resource/analysis-current-and-future-value-indigenous-

specifically having a fund to enhance, build, and benefit Indigenous Guardian programming would, in our minds, advance reconciliation.

- **Traditional ecological knowledge**: We must respect the value of traditional ecological knowledge and First Nations driven research, and consider it in management decisions.

Challenge 2: How to increase the involvement of non-governmental conservation organizations as well as a broad range of wildlife and habitat stakeholders and the general public in wildlife management and habitat conservation.

Discussion Q 1: How should a broad range of stakeholders be involved in wildlife management and habitat conservation decisions?

- **Adjust Phase 2:** Page 7 of the primer lists out the Phases of Participation in this engagement process. The list of perspectives sought in Phase 1 is comprehensive, but Phase 2 only includes Indigenous peoples and stakeholders. We recommend explicitly including wildlife and habitat organizations in Phase 2. Processes like this one, by which comments from regular citizens are heard on a publicly available platform, ensure multiple voices, opinions, and lenses are heard.
- **Limit reliability on consumptive groups**: Consumptive groups are generally the only ones that have opportunity and permission to lobby for their causes at the governmental level, leaving groups that don't have the benefit of mobilization behind and unheard. Historically, consumptive groups have been given additional opportunities for government engagement, and we believe that multiple views should be engaged. For example, we recognize the historical role the Guide Outfitters of BC has played in wildlife and habitat management, but we don't feel they should be the sole contributors to population estimates and hunting quotas.
- **Inclusive stakeholder lists**: Identify key conservation NGO stakeholders and include them in wildlife management and habitat conservation discussions.
- **Education:** Improve understanding of the social, economic, and environmental value of wildlife and their habitats within functioning ecosystems through curriculum-based education for students. This will foster future generations that think holistically about our ecosystems, and value and appreciate the need for wildlife management and habitat conservation.

Discussion Q 2: What are your suggestions for a new governance model for wildlife management and habitat conservation?

- **Panel of Experts:** We suggest creating a wildlife management and habitat conservation panel of experts to help lead the process of decision making. This panel should include at least:
    - two experienced and unbiased biology, conservation, or natural resource professionals
    - two Indigenous representatives
    - one consumptive group representative
    - one non-consumptive group representative

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- one environmental NGO representative
- one natural resource economist

- **Interjurisdictional decisions:** Ensure regular discussions are had around the interjurisdictional issues surrounding migratory wildlife and cross-border habitat corridors. Currently, migratory birds, many marine mammals, and the odd migratory mammal are the federal government's responsibility, but large carnivores require swaths of space that may cross borders. Conservation and management decisions should perhaps be made with input from other provincial and state governments.

Challenge 3: Some wildlife populations are declining across the province.

Discussion Q 1: What measures need to be taken to proactively manage wildlife and habitat and prevent wildlife from becoming species at risk?

- **Ongoing monitoring (both government and non-government data):** Regular and ongoing monitoring needs to be done. It is very difficult to know if wildlife is at risk without knowing the size of the population(s). Recognizing that this type of work requires many staff, monitoring could be done through contracts with other agencies (ie. NGOs, universities, Indigenous Guardians) and resulting data should be acknowledged at the same level as government collected data. Independent peer reviewed science should be utilized, and government could set standards and develop best practices to ensure non-government research is acceptable for government use.

- **Traditional ecological knowledge:** Accept Aboriginal traditional ecological knowledge as valuable in the decision making process.

- **Redefine "Best Available Science":** Government decisions should be made using the following hallmarks: measurable objectives, evidence, transparency, and independent review. Evidence can include government collected science, peer reviewed research, and public values, and should all be acknowledged at the same level. Any science that is used to inform government decisions should be peer reviewed. This will help to ensure provincial management that reflects the public interest of all British Columbians.

- **Food security:** Include food security as a mortality factor when discussing wildlife populations. For this purpose, food security should be defined as "Sufficient food quality and quantity as needed to drive sustainable reproduction; quality food that is available, accessible, and free from threat."

- **Precautionary approach:** The precautionary approach should be used in all decision making, with a lens toward long-term ecosystem health.

- **Protected areas:** Increase the level of protection of wildlife habitat corridors.

Challenge 4: Habitat loss, alteration and fragmentation are increasing due to human activity.

Discussion Q 1: What is the most effective way of ensuring that wildlife and habitats are healthy while fostering a healthy economy to ensure life is affordable for British Columbians?

- **Transparency:** We are concerned that this discussion question has little to do with the challenge presented. "Fostering a healthy economy" and "ensuring life is affordable" seems vague and relative with regard to habitat loss, alteration, and fragmentation due to increasing human activity. We recommend prioritizing a 'sustainable economy' over just a 'healthy economy', and removing 'affordable'.

- **NGO economy:** It should be noted that consumptive stakeholders are not the only ones growing the economy. Non-governmental environmental organizations are also employing thousands British Columbians while supporting a diverse, sustainable economy.

- **Ongoing monitoring (both government and non-government data):** Regular and ongoing monitoring needs to be done. It is very difficult to know if wildlife is at risk without knowing the size of the population(s). Recognizing that this type of work requires many staff, monitoring could be done in through contracts with other agencies (ie. NGOs, universities, Indigenous Guardians) and resulting data should be acknowledged at the same level as government collected data. Government could set standards and develop best practices to ensure non-government research is acceptable for government use.

- **Ecotourism:** Ecotourism, with regulation to minimize impact on wildlife and habitat, should be prioritized as an economic opportunity as it is a useful conservation tool.

- **COS funding / resources:** Increased funding and resources should be provided to the Conservation Officer Service for the enforcement of human activity (recreational use, resource development, hunting and trapping, agricultural use).

- **Land use planning:** it should be noted that many land use plans have objectives for maintaining wildlife habitat. Land use plans cannot just be created, however - they must also be implemented. Focusing provincial resources on land use planning initiatives as well as implementing said plans presents a major opportunity to improve the use of our crown lands for the benefit of all.

- **Road management:** The development of roads (resource roads, recreational roads, public roads) should be carefully monitored as they are affecting migration routes, using best practices that ensure minimal impact on wildlife.

- **Environmental assessment standards:** Work should be done with industry to ensure they are meeting environmental impact standards. This could be done through natural resource legislation. Environmental impact assessments should be based on both scientific and Indigenous knowledge.

Challenge 5: Climate change is resulting in more wildfires and extreme weather, contributing to wildlife diseases, forest health issues, and the spread of invasive species, affecting wildlife populations and altering habitats.

Discussion Q 1: What are the most effective ways to proactively adapt to the impacts of climate change on wildlife and habitats?

- **Precautionary principle:** Ensure the precautionary principle is used in all wildlife management and habitat conservation decision making.

- **Precautionary principle:** Include the precautionary principle in larger climate change action plans.
- **Proactive wildfire mitigation:** Proactively invest in wildfire mitigation practices such as prescribed burns.
- **Protected areas**: Ensure that habitat corridors are protected so wildlife can move between habitats in order to meet their needs.
- **Traditional ecological knowledge:** Apply Aboriginal traditional ecological knowledge to inform useful practices in maintaining ecosystem balance.
- **Include wildlife in management, conservation, and climate change action plans:** Ensure that wildlife and habitat are included in any future management plan that is produced by all Ministries (for example, Minister Heyman's upcoming climate change action plan "Towards a Clean Growth Future for B.C.").
- **Consider food security:** Climate change is impacting when and where food sources for wildlife are available, and can impact the quality of those sources. If wildlife are unable to get enough food, human-wildlife is sure to increase as they move into communities to find other food sources. Consider wildlife allocations when managing food sources (ie. wild salmon stocks, non-timber resources, etc.) so that wildlife have access to enough without needing to risk interaction with humans.

Challenge 6: There is a growing need for better information on wildlife and habitats to inform management and conservation outcomes as well as achieving robust compliance and enforcement.

Discussion Q 1: How can Traditional Ecological Knowledge, citizen science and other forms of knowledge complement science to support decision-making?

- **Redefine "Best Available Science":** Partnerships between Western scientific communities and Indigenous peoples/local communities should be fostered to better inform management and conservation outcomes.
- **Traditional ecological knowledge:** Indigenous guardianship programs should be supported, and scientific data gathered as part of the programming should be government recognized.
- **Redefine "Best Available Science":** Citizen science is valuable, but it should be noted that non-governmental scientists and organizations should not be considered 'citizen scientists', and acknowledge peer reviewed non-government science contributes to the "best available science". Government could set standards and develop best practices to ensure non-government research is acceptable for government use.

Discussion Q 2: What are the best ways to share information broadly so that there is transparency and trust is gained among all parties?

- **Public accessibility:** Government's scientific databases should be made publicly accessible.
- **Transparency:** Transparency about the weight of criteria in decision making (ie. this decision was backed

by a) strong science using the precautionary principle, b) citizen consult / public opinion, and c) political motivation).

Challenge 7: Concerns about human-wildlife conflicts are increasing, including those related to agricultural impacts, urban wildlife, wildlife-vehicle collisions and dangerous wildlife.

Discussion Q 1: What are the most effective ways to reduce wildlife-human conflicts in British Columbia?

- **Additional Conservation Officer Service funding:** Enforcement is key - commit more funding and resources to the Conservation Officer Service (COS) to give them a better chance of monitoring and enforcing regulations.

- **Evaluate efficacy and increase effective education:** Increase the number of coexistence education programs province-wide. Recognizing that this type of work requires many staff, coexistence programs could be realized through contracts with other agencies (ie. NGOs, contractors). For example, the Auditor General of BC notes in *The Independent Audit of Grizzly Bear Management* that the "the COS relies on WildSafe BC to deliver an education program to prevent conflict with bears but the program is limited and the COS has not evaluated it for its effectiveness"[2]. Evaluation should be done to understand which programs are effective and thus worthwhile supporting.

- **Consider food security:** Climate change is impacting when and where food sources for wildlife are available. If wildlife are unable to get enough food, human-wildlife is sure to increase as they move into communities to find other food sources. Consider wildlife allocations when managing food sources (ie. wild salmon stocks, non-timber forest products, etc.) so that wildlife are getting enough without needing to risk interaction with humans.

- **Amend the Right to Farm Act:** The Conservation Officer Service (COS) currently does not have jurisdiction on agricultural land. Amending the Right to Farm Act to give the COS enforcement authority on agricultural land will help to reduce human-wildlife conflicts.

- **Land use planning:** Focusing provincial resources on land use planning initiatives as well as implementing said plans presents a major opportunity to improve how humans use our landscapes in a way that reduces the risk of human-wildlife conflict.

- **Target specific communities:** Address the underlying causes of human-wildlife conflict with targeted communities (ie. BC Cattlemen's Association, amateur wildlife photographers, recreationalists) and areas that are experiencing high rates of human-wildlife interaction and conflict.

- **Pilot coexistence strategies:** Pilot new and innovative wildlife coexistence programs. In relation to grizzly bears, this could include range rider programs, livestock disposal sites, fallen fruit jam harvest programs, etc. Ensure programs are evaluated and continue those with proven success.

Challenge 8: Wildlife management and habitat conservation are funded through annual Ministry budgets, contributions to the Habitat Conservation Trust Foundation from surcharges on hunting, trapping and guide outfitting licenses, and through partnerships (ie. academia, NGOs, industry, etc.) Current funding levels may

[2] Auditor General of British Columbia. An Independent Audit of Grizzly Bear Management. October 2017. Page 8.

not meet expectations for improved wildlife and habitat conservation.

Discussion Q 1: What are the best funding models, funding sources, and creative financing ideas that could increase resources for wildlife management and habitat conservation and provide additional flexibility for how funding is prioritized and allocated?

- **Conservation licensing fee:** Establish a user-pay model Conservation Licensing Fee with ecotourism operators province-wide, directing all collected funds back to species and habitat conservation. Separate conservation licensing fees from the hunting, trapping and guide outfitting licensing fees that go to the Habitat Trust Conservation Foundation for transparency.

- **Guardian programming**: Indigenous Guardian programs are enormously important and allow for self-determined wildlife management and habitat conservation planning on traditional territories. Support, leverage, and enhance these programs.

- **Collaborative work:** Management, conservation, and ongoing wildlife and habitat monitoring could be done through contracts with other agencies (ie. NGOs, universities, Indigenous Guardians) provided there is funding assistance. Often, people and organizations are willing and able to do the work but simply do not have the financial resources to do so.

- **Grants:** Open BC Gaming grants to have a section for Wildlife (separate to Environment).

CONCLUSION

We would like to reiterate our support for a new framework using a collaborative approach to improve wildlife management and habitat conservation in British Columbia.

The primer indicates that Phase Two of participation will include analysis and collaborative policy development (fall 2018 to spring 2019). As the only organization solely dedication to the grizzly bear, one of our most iconic umbrella species, we wish to be consulted as a stakeholder, and as such would like to be involved in Phase 2 of this process. Additionally, we wish to be consulted as a stakeholder in the development of the upcoming grizzly bear management plan.

Sincerely,

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