



May 11, 2020

Honourable Doug Donaldson Minister of Forests Lands and Natural Resource Operations and Rural Development PO Box 9049, Stn Prov Govt Victoria, BC V8W 9E2

Via email: flnr.minister@gov.bc.ca

RE: Caribou Recovery Strategies and the War on Moose

Dear Minister Donaldson

We are writing to you jointly, as two organizations deeply committed to effective, science-based wildlife management.

GOABC is a nonprofit society that was established in 1966 to represent the guide outfitting industry to government, and advocate for science-based wildlife management. Our vision is for a province with a strong and stable guide outfitting industry and abundant wildlife populations for all to enjoy, both today and in the future. As passionate advocates for wildlife, GOABC is the recognized voice of the guide outfitting family.

The BC Wildlife Federation was formed in 1951 to address the concerns of resident hunters and today is BC's leading conservation organization. Our vision is to lead the conservation and wise use of British Columbia's fish, wildlife and habitat. Our mission is to protect, enhance and promote the wise use of the environment for the benefit of present and future generations.

It is deeply concerning to both of our groups that your ministry has no objectives for wildlife. Our organizations want to see a multispecies approach to wildlife management, and we urge you to set population objectives, including density objectives, for all species and proactively manage to these objectives. What we have in BC is special. Wildlife is a valuable resource; it must be seen as such and managed accordingly. Bold action is vital to ensure we have abundant wildlife populations, both today and in the future. We must not wait until there are only a few of a species remaining before taking action.

Once objectives have been set, government needs to track the results of management actions and be held accountable for the outcomes. It must be clear what impacts our efforts are having, both positive and negative, and we must be aggressive in our efforts to achieve specific population-recovery goals.

Primary (Alternate) Prey Theory

Managing one species in isolation of the rest is not a management tool we can support. Managing any species in this manner can have significant ecological impacts, and may result in prey switching as well, putting the endangered species we are trying to protect at risk of extirpation. In two areas where primary prey reduction has been tried, the results were inconclusive. Science has demonstrated that a multi-pronged effort is the best approach.

In addition, reducing moose numbers in an attempt to mitigate caribou loss to predation is not a tactic we support. Government is not doing enough to help moose recover in many parts of the province where there are severe declines in moose numbers (and no conflicts with caribou).

Predator Control

Predator management, particularly wolves, has been demonstrated to be one of the most effective tools to deal with the proximate cause of caribou mortality. This tool will need to be used for decades until a healthy, balanced mix of predators and prey is achieved, but must be combined with other tools, such as limiting resource development, reducing linear features, and managing all species.

Maternal Penning and Captive Breeding

Studies on maternal penning show variable success in caribou survival and worked best in the Klinze-Za herd when accompanied by aggressive wolf removal.

We understand that government is considering some captive breading trials for caribou. Captive breading, as with maternal penning, will be expensive, has associated risks such as health issues and loss of "wildness," and likely will have little impact without associated landscape-level actions such as predator removal and habitat recovery. Maternal penning and captive breeding should only be considered in very limited situations for specific caribou studies.

Effective wildlife management requires difficult – and sometimes unpopular – decisions be made. We urge you to base your decisions and actions upon proven science.

Sincerely,

Sean Olmstead President, GOABC Bill Bosch President, BCWF

Encl. (1) – Primary Prey paper

CC: David Muter, A/Assistant Deputy Minister, FLNRORD