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**Honourable Minister Bruce Ralston,**

**BCWF feedback to the Grizzly Bear Stewardship Framework Public Engagement**

The B.C. Wildlife Federation is responding to the call for feedback on the B.C. Provincial Government’s **Grizzly Bear Stewardship Framework Public Engagement**. The BCWF is committed to working with First Nations to restore the Grizzly bear hunt in B.C., governed by science-based management.

The foundations of renewable resource management include funding and capacity; science (inventory, management, monitoring, objectives, and research); legislation; and finally, governance. A number of these are missing from the stewardship framework.

A future with abundant Grizzly bears will not occur in absence of these fundamentals:

- B.C. has consistently reduced funding to renewable resource management and eliminated 100 years of institutional knowledge from Grizzly bear programs.
- B.C. has failed to set objectives for Grizzly bear recovery and continues to make wildlife management decisions based on political expediency rather than available evidence.
- Evidence points to habitat disturbance as a main driver of Grizzly bear declines, not hunting.
- On-the-ground action to protect Grizzly habitat is practically non-existent. Research and data collection have ground to a halt.

**Funding and Capacity**

There is no commitment for funding or resources to implement this Framework. Before the hunt was closed, there were three researchers/policy analysts (all PhDs with extensive grizzly bear experience) and a wildlife conflict manager working predominantly on grizzly bears in British Columbia. There is now only one individual within the B.C. government working on grizzly bears. More than 100 years of combined expertise has been eliminated.

Montana, an area 40 per cent the size of British Columbia, with grizzly bears only occupying half of the jurisdiction has 14 full-time equivalents dedicated to grizzly bear stewardship, and a budget of \$1.44 million per year while British Columbia has one full-time equivalent and a shoestring budget.

Compared to our neighbours to the east, north and south, British Columbia is the most poorly funded fish and wildlife agency. Given the biodiversity and number of fish and wildlife species in British Columbia, it is likely the most poorly resourced jurisdiction in North America. As a proportion of the provincial budget, 2022 was the worst year on record for funding renewable resource management with only an estimated 1.13 per cent of the provincial budget dedicated to renewable resource management, a 75 per cent cut compared to 1992.

**The threats British Columbia is now facing are orders of magnitude more than they were just three decades ago and the Provincial government's response has been to dramatically reduce funding and capacity.**

***Without a commitment to provincial funding and capacity in the plan, this is a plan to fail.***

## Science

This plan does not contain a provincial objective for grizzly bear populations, or habitat. This allows the provincial government to be unaccountable to the public and First Nations as it relates to the future with grizzly bears. Leadership means setting a provincial objective and committing resources to achieve that objective. Without funding and capacity, science simply does not exist, ensuring government operates in isolation of evidence.

Even when the province has science and evidence it has consistently departed from this science into unprincipled management by emotions. On May 17, 2022, former Forests Minister Katrine Conroy was questioned in the House regarding LEH (Limited Entry Hunting) decision making strategies, and stated "Yes, our decisions are influenced by science."

The decision to close the grizzly hunt was made in contradiction to the Vision, Principles & Goals of Together for Wildlife, the new Provincial Wildlife Management Strategy. Instead of upholding these principles, the decision was made under social values, instead of science and evidence-based management.

The Office of the Auditor General of British Columbia released a report on October 24, 2017, entitled "An Independent Audit of Grizzly Bear Management." This independent audit found that the greatest risk to the province's grizzly bear population is loss of habitat, not hunting, and furthermore "Grizzly bear populations in some areas of B.C. are now increasing." Since that report, cumulative effects on the landscape have only increased.

During the time of the hunt, grizzly bears were mandatory inspection after licensed harvest. This process was completed by a government inspector. During these exams, DNA in the form of hair, tooth removal, as well as proof of sex and location markers were given to the biologists by the hunter. This data allowed the B.C government biologists to track not only age/sex, but to set Annual Allowable Harvest quotas for each GBPU (Grizzly Bear Population Units) to sustainably manage harvest. This data collection and related science is now missing from grizzly bear management. Grizzly bears are currently being harvested across the province, but the province has no data on these bears. The BCWF is extremely concerned that the rapid departure from science-based wildlife management to politics has resulted in a data gap for grizzly bears.

Multiple recent decisions related to endangered and threatened salmon and steelhead, moose in the Northeast, sheep and goats in the Kootenay region, and Caribou recovery demonstrate that the province of British Columbia has walked away from a future of science-based wildlife management and abundance to a future where it continues to manage fish and wildlife to zero.

The closure of the grizzly bear hunt not only leaves a gap in science and knowledge, but effectively removed a large portion of the very funding required to monitor and manage grizzly bears.

**The BCWF fully supports the return of a science-based grizzly hunt.**

***Without legislated objectives and a commitment to science-based wildlife management, this plan will fail.***

### **Priority Areas**

Threatened/endangered GBPU's need immediate action and priority. The province has a long track record of plans that fail; we have reason to believe this is no different. Setting measurable, time-bound plans with specific priorities and actions is mandatory. Grizzly bear populations do not respond to plans; they respond to on-the-ground actions.

**The Sea to Sky grizzly bear recovery initiative has been 'in play' for decades. While a number of Ministers have talked about it, none have committed to it.**

***Without a commitment to threatened/endangered GBPU's including measurable actions and objectives, this plan will fail.***

### **Timelines and Deliverables**

This document fails to address future planning, deliverables, and objectives. Like thousands of other plans created by the province, this plan will collect dust while sitting on the shelves of an office in Victoria without a meaningful outcome achieved.

The province paid for "A Strategy to Help Restore Moose Populations in British Columbia" in 2016. Since then, moose populations have continued to decline and the management actions in the document have not been actioned.

***Without a commitment to a timeline for delivery of action items, this plan will fail.***

### **Wildlife Act**

Changes to the *Wildlife Act* are necessary to move away from an act that focuses exclusively on hunting regulations and permitting to an act and legislation that ensures a future for wildlife. This document does not address those needs, nor does it address conflict or the *Farm Act*. There is insufficient funding to manage human-wildlife conflict in the province, a lack of municipal bylaws, lack of enforcement of municipal bylaws and a lack of capacity both provincially and at the municipal level to manage conflict.

***Without a provincial commitment to create a Wildlife Act focused on the future of wildlife, and resource and managing conflict, this plan will fail.***

## Conclusion

The BCWF supports sustainable grizzly bear populations, recovery of endangered and threatened populations, as well as hunting and associated science-based wildlife management practices. The B.C. Wildlife Federation recognizes and acknowledges that Aboriginal rights, and that culturally important sites are respected and maintained. Both above statements suppose a future with grizzly bears.

It is not possible to manage wildlife, including grizzly bears, without dedicated funding and capacity. There is no mention of these long-standing, pervasive issues in the draft plan. This draft plan is built so that the province is unaccountable for timelines and outcomes. This appears to be another form of displacement activity which has been demonstrated dozens of times over the past six years.

If the province does not commit to and include resourcing, objectives and timelines, this plan will be viewed by the B.C. Wildlife Federation and its membership as another paper exercise that the province is not legitimately committed to. Without funding and capacity this plan, amongst thousands of others, will be yet another example of the province planning to fail.

The BCWF will continue to work with First Nations and other groups to support a properly funded fish and wildlife management structure and the return of a grizzly bear hunt in British Columbia.

Cited- [https://engage.gov.bc.ca/app/uploads/sites/121/2023/05/Grizzly-Bear-Stewardship-Framework\\_Draft-Final.pdf](https://engage.gov.bc.ca/app/uploads/sites/121/2023/05/Grizzly-Bear-Stewardship-Framework_Draft-Final.pdf)

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[https://www.bcauditor.com/sites/default/files/publications/reports/FINAL\\_Grizzly\\_Bear\\_Management.pdf](https://www.bcauditor.com/sites/default/files/publications/reports/FINAL_Grizzly_Bear_Management.pdf)

We invite the opportunity to discuss these concerns further. Please contact us with your availability at [jesse.zeman@bcwf.bc.ca](mailto:jesse.zeman@bcwf.bc.ca).

In Conservation,

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