

B.C. Wildlife Federation
101 – 9706 188 Street
Surrey, BC, V3W 5Y4

Honourable Minister George Heyman
Minister of Environment and Climate Change Strategy
ENV.Minister@gov.bc.ca

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The B.C. Wildlife Federation (BCWF) is responding to the call for feedback on the BC Provincial Government **Commercial Bear-Viewing Strategy Public Engagement**.

The BCWF supports sustainable hunting and associated management practices when based on evidence, and we are calling for similar measures when it comes to wildlife and bear viewing. We also recognize and acknowledge that Aboriginal rights and interests need to be protected, and that culturally important sites are respected and maintained.

The BCWF recognizes that commercial bear viewing is a highly profitable and sustainable use of a resource, however, we are concerned that without objectives, legislation, and regulation, there is a potential for misuse and serious impacts on wildlife and their habitats.

We are aware that most of the issues below are covered in the draft plan, but we are highlighting them as concerns that must be addressed as the plans are finalized.

- Protecting Aboriginal rights and title.
- Minimizing the impacts on habitat around viewing areas.
- Minimizing the impact to bears, including habituation of bears to humans in these areas.
- Prioritizing residents of BC during the tenure approval process whether it is for angling, hunting, trapping, recreating, or owning commercial bear viewing tenures.
- Providing solutions that prevent or minimize the exclusion of other activities.
- Providing stakeholders and the public opportunities for early and meaningful engagement.

The draft plan notes that commercial viewing licenses include ‘when and where’ stipulations that can exclude use from other stakeholders. Consideration must be given to others who might be hunting, trapping, and enjoying our resources. Will there be times when licensing bear viewing will exclude other activities? How will this consultation process work, and what are the criteria for exclusion?

Stakeholders need to be involved early on in discussions about protection and or other activity exclusion areas. This will not only impact recreational users, but commercial users such as trappers, guide outfitters, logging, and other resource-based users. There needs to be recognition that all activities on the landscape, especially when infrastructure and many people are involved, that this impacts wildlife and habitat, and clear and measurable objectives must be set with this in mind.

Furthermore, all anglers, hunters, and trappers contribute to the Habitat Conservation Trust Foundation when purchasing licenses and tags. Other activities on the landscape, including commercial bear viewing, should follow suit and contribute to conservation. Anglers, hunters, and trappers put millions of dollars into the resource in

British Columbia, and commercial bear viewing should contribute in a similar way as their activities affect wildlife and habitat. The BCWF supports these surcharges if the associated funding is dedicated to fish and wildlife management with a focus on actions that clearly make a difference for fish, wildlife and their habitats.

Science-based wildlife management in British Columbia continues to be a priority for the B.C. Wildlife Federation, and we support a highly regulated grizzly bear harvest where there are no conservation concerns. First Nations have indicated support for this hunt in some regions in B.C.

We believe that there is room for both sustainable hunting and viewing, however there are many issues that need to be brought to the forefront and involve a deeper conversation and discussion before this can move forward.

In Conservation,

On behalf of the B.C Wildlife Federation

CC:

Minister Brenda Bailey - Minister of Jobs, Economic Development and Innovation
JEDI.Minister@gov.bc.ca

Minister Lana Popham - Minister of Tourism, Arts, Culture and Sport
TACS.Minister@gov.bc.ca

Minister Nathan Cullen - Minister of Water, Land and Resource Stewardship
WLRS.Minister@gov.bc.ca

Minister Mike Bernier - Shadow Minister for Forests
mike.bernier.MLA@leg.bc.ca

Minister Renee Merrifield - Shadow Minister for Environment & Climate Change, Technology & Innovation
renee.merrifield.MLA@leg.bc.ca

Minister Lorne Doerkson - Shadow Minister for Water, Land & Resource Stewardship & Rural Development
lorne.doerkson.MLA@leg.bc.ca

Minister Ben Stewart - Shadow Minister for Tourism and Trade
ben.stewart.MLA@leg.bc.ca

Minister Todd Stone - House Leader, Shadow Minister for Jobs, Small Business & Economic Development
todd.stone.MLA@leg.bc.ca