

MINUTES
PHTAT STAKEHOLDER CONSULTATION
RE: PROPOSED GRIZZLY BEAR HUNT REGULATIONS
October 13, 2017 @ 9:00 am – 11:30 am

Location: 2975 Jutland Road, 1st Floor, Meeting Room 1-1

Independent Facilitator: Sheila Beauchemin (SB)

Government Staff (Victoria):

- Jennifer Psyllakis (JP), Director of Fish and Wildlife
- Penny Lloyd (PL), Manager of the Legislative and Regulatory Reform
- Cole Winegarden (CW), Senior Advisor, Legislative & Regulatory Reform
- Claire Yick (CY), Senior Policy Analyst
- Steve MacIver (SM), Regulations and Policy Analyst
- Suzanne Harkness (SH), Senior Policy and Legislative Analyst
- Kate Craig (KC), Senior Wildlife Policy Analyst
- Michael Burwash (MB), Associate Director, Wildlife (via phone)
- Tony Hamilton (TH), Large Carnivore Specialist (via phone)
- Dr. Bruce McLellan (BM), Wildlife Research Ecologist (via phone)
- Helen Schwantje (HS), Wildlife Veterinarian (via phone)

PHTAT Stakeholder Attendees:

- BC Trappers Association - Brian Dack (via phone), Shaun Freeman
- BC Wildlife Federation - Al Martin, Jesse Zeman, Gerry Paille
- Guide Outfitters Association of BC (GOABC) - Scott Ellis, Sean Olmstead
- United Bowhunters of BC - Bill Tozer, Jim Turner (via phone)
- Wildlife Stewardship Council - John Henderson, Bill Oestreich (via phone)
- Wild Sheep Society of BC - David Heitsman, Lisa Hettrich (via phone)

Introduction and Welcome by Jennifer Psyllakis (5 mins)

- Will be covering technical details of policy

Introduction by Sheila Beauchemin on format of consultation (5 mins)

- Discussion guide:
 - Everyone will have opportunity to be heard
 - All views are valid
 - We will stay on task and on time

Introductions by Stakeholders (10 mins)

- **Scott Ellis** – Guide Outfitters Association of BC (GOABC)
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- **John Henderson** – Wildlife Stewardship Council
s.21

- **Bill Tozer** – United Bowhunters of BC
s.21

- **Al Martin** – BC Wildlife Federation
s.21

- **Jesse Zeman** – BC Wildlife Federation
s.21

- **Brian Dack** – BC Trappers Association
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- **Jim Turner** – United Bowhunters of BC
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- **Bill Oestreich** – Wildlife Stewardship Council
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- **Gerry Paille** – BC Wildlife Federation

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Key discussion items:

1. *Any issues or recommendations for the proposed boundaries for the Great Bear Rainforest closure?*
2. *Which grizzly bear parts should be considered a trophy?*
3. *Is there support for the broadening of the definition of edible portions?*
4. *Is a one year grace period long enough to allow for a smooth transition to a trafficking prohibition?*
5. *What information should taxidermists and tanners be reporting?*
6. *Are there concerns with maintaining the status quo for import and export?*
7. *Should all trophy parts be brought into government?*
8. *What grizzly bear parts are required for compulsory inspection?*

Final Thoughts (30 mins)

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Wrap-up (5 mins)

- **JP** – Productive meeting. Not only forum for comments. Open to accept submissions, as is Minister. So much more to talk about.

Parking Lot

- How does this apply to FN people who own guide outfitting territory?
- How does the regulation square with the UN declaration?
- Will changes in population structure in the closure area and adjacent areas be monitored?
- Is government's intent to expropriate assets by decreasing commercial value? Is that the intent on prohibition?
- What is formula for compensation for affected parties (e.g., personal property - those who own grizzly bear mounts; guide outfitters)
 - o Will there be compensation available? Will my grizzly mount now be worthless?
- What is definition of trophy (not exclusive to GB)?
- What is definition of sustenance hunt?
- This discussion to extend to other species (e.g., cougar)
- How can BC prohibit grizzly bear trophy hunting yet still allow work on trophies from other jurisdiction? How is this equitable?
- What thresholds have to be crossed in public polling to result in a policy change?
- What about FN/FN Artists? Will they be able to get items from across the border as well (e.g., from US)?
 - o PL – will bring question to Abo lawyers re: this point
- British Columbia Trappers Association: wants to know if GB will become a fur bear like black bear?

MINUTES
ENGO STAKEHOLDER CONSULTATION
RE: PROPOSED GRIZZLY BEAR HUNT REGULATIONS
October 13, 2017 @ 1:30 pm – 4:00 pm

Location: 2975 Jutland Road, 1st Floor, Meeting Room 1-1

Independent Facilitator: Sheila Beauchemin (SB)

Government Staff (Victoria):

- Jennifer Psyllakis (JP), Director of Fish and Wildlife
- Penny Lloyd (PL), Manager of the Legislative and Regulatory Reform
- Cole Winegarden (CW), Senior Advisor, Legislative & Regulatory Reform
- Claire Yick (CY), Senior Policy Analyst
- Steve MacIver (SM), Regulations and Policy Analyst
- Suzanne Harkness (SH), Senior Policy and Legislative Analyst
- Kate Craig (KC), Senior Wildlife Policy Analyst
- Michael Burwash (MB), Associate Director, Wildlife (via phone)
- Tony Hamilton (TH), Large Carnivore Specialist (via phone)
- Dr. Bruce McLellan (BM), Wildlife Research Ecologist (via phone)
- Helen Schwantje (HS), Wildlife Veterinarian (via phone)

ENGO Stakeholder Attendees:

- Coast to Cascades Grizzly Bear Initiative - Johnny Mikes (via phone)
- David Suzuki Foundation - Faisal Moola (via phone)
- Grizzly Bear Foundation - Suzanne Veit
- Raincoast Conservation Foundation - Brian Falconer
- Wilderness Tourism Association of British Columbia - Kevin Smith

Introduction and Welcome by Jennifer Psyllakis (5 mins)

- Overwhelmed by response from multiple interest groups

Introduction by Sheila Beauchemin on format of consultation (5 mins)

- Discussion guide:
 - Everyone will have opportunity to be heard
 - All views are valid
 - We will stay on task and on time

Introductions by Stakeholders (10 mins)

- **Brian Falconer** – Raincoast Conservation Foundation

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- **Suzanne Veit** – Grizzly Bear Foundation
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- **Kevin Smith** – Wilderness Tourism Association (WTA) of British Columbia
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- **Faisal Moola** - David Suzuki Foundation
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- **Johnny Mikes** - Coast to Cascades Grizzly Bear Initiative
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F. Conclusion (Penny Lloyd)

Key discussion items:

1. *Any issues or recommendations for the proposed boundaries for the Great Bear Rainforest closure?*

2. *Which grizzly bear parts should be considered a trophy?*
3. *Is there support for the broadening of the definition of edible portions?*
4. *Is a one year grace period long enough to allow for a smooth transition to a trafficking prohibition?*
5. *What information should taxidermists and tanners be reporting?*
6. *Are there concerns with maintaining the status quo for import and export?*
7. *Should all trophy parts be brought into government?*
8. *What grizzly bear parts are required for compulsory inspection?*

Final Thoughts (30 mins)

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Wrap-up (5 mins)

Parking Lot

- Does the government want to be seen as promoting the increase in sustenance hunting?
- Strong opinion against killing bears in the province. Total mortality needs to decline or government will have challenges explaining the point of the regulations.
- What is the outcome that government is trying to achieve?
- There should be a complete ban on GB hunting within BC – this decision does not go far enough.
- The public is confused. The public doesn't have appetite for trophy hunting.
- Smallest definition being used for GBR, expand to include MU is very small ask



ALAN DOLAN
& ASSOCIATES

*Community Engagement,
Facilitation, Communications*

Ministry of Forests, Lands, Natural Resource Operations & Rural Development

Engagement Report Regulatory and Policy Changes to the Grizzly Bear Trophy Hunt

November 15, 2017
Alan Dolan & Associates

Executive Summary

In mid-August, the Government of BC announced that effective November 30, 2017, grizzly bear trophy hunting will cease throughout the province and that all hunting of grizzly bear will cease in the Great Bear Rainforest.

This three-part report summarizes the results of engagement with public, stakeholders, and First Nations

Public engagement

Two policy intent papers were developed and posted to the Fish & Wildlife website on October 2, 2017 and the Ministry of Forests, Lands, Natural Resources Operations & Rural Development (FLNRORD) announced a public engagement process. Participants in the engagement process were asked to comment on the policy papers and in particular to comment on:

- Changes to manage the ban in hunting areas that overlap the Great Bear Rainforest
- Changes that will prohibit the possession of "trophy" grizzly bear parts
- Changes that will manage prohibited grizzly bear parts
- Changes to prohibit the trafficking of grizzly bear parts
- New reporting requirements for taxidermists

A total of 4,180 emails was received, which included 1,765 emails based on form letters published by interest groups.

Analysis of the broader content of the emails revealed responses that were categorized into seven main areas (Figure 1). The overwhelming largest response (78%) was "to ban grizzly bear hunting in all parts of the province" (in subsequent sections these respondents will be referred to as Group 1). The second highest response was those who opposed the end of the trophy hunt (13.2%) (referred to as Group 2), followed by those who opposed banning grizzly bear hunting anywhere in the province (4.6%).

Very few respondents (less than 3%) simply supported the ban on the trophy hunt as proposed. Respondents tended to be emphatic that this did not go far enough (it should be a total ban on all grizzly hunting, not just in the Great Bear Rainforest), or conversely that banning the trophy hunt was a bad idea for reasons related to economic contributions, a long history of hunting, grizzly bear population management, etc.

Of those respondents who supported banning all grizzly hunting in BC (Group 1), the most frequent reasons in descending order of importance were:

- Too many loopholes in the regulations as proposed
- Nobody (or almost nobody) eats grizzly bear meat
- Grizzly bear population is endangered
- Increasing value of eco-tourism and bear watching to the economy
- Full ban is the only way to end the trophy hunt
- Hunting such an iconic species is unacceptable in this day and age

Of those respondents who want the grizzly bear hunt to continue (Group 2), the most frequent reasons in descending order of importance were:

- Grizzly management should be based on science, not emotion and politics
- Hunting is an important population management tool
- Grizzly bear populations are mostly healthy
- There will be more human-bear conflicts if there is less hunting
- Other ungulate populations will be negatively affected if the hunt is stopped
- Hunting is important to the economy

Very few respondents addressed the specific proposed regulations, but tended to provide input on broader policy issues. Respondents raised a number of issues, in descending order of frequency:

- Hunt is no longer appropriate
- Too many loopholes in the proposed regulations
- Wasteful to leave anything behind after an animal is killed
- Hunt should be based on science, not emotion and politics
- Significance of the meat hunt for grizzly bears
- Economics of grizzly bear hunting
- Hunting as a management tool
- Population dynamics of grizzly bear
- Habitat of grizzly bear
- Urban / rural split around grizzly bear hunting
- Great Bear Rainforest hunting closure
- Hunting by First Nations
- Lack of enforcement
- Trophy terminology

Stakeholder engagement

Emails and letters were sent to the Ministry's key stakeholder lists and meetings were held with 15 different organizations. Letters were also received from many of these key stakeholders as well as 11 other stakeholder organizations. Results of these letters and meetings are summarized. Many of the same issues that were raised in the public engagement were also raised but stakeholder groups. Certain groups provided more in-depth feedback than was usually provided by members of the public.

First Nations Engagement

Emails were sent on September 27 and 28, 2017 to more than 200 First Nations across the province including First Nations with signed treaties regarding the grizzly bear trophy hunting ban. Emails were also sent September 27 and 28 to the 41 First Nations that either overlap or are adjacent to the Great Bear Rainforest.

Engagement meetings were set up with First Nations and five letters from First Nations organizations and four emails from individuals were received. The meetings and letters were summarized individually but summaries were purposefully not aggregated because each nation has a different situation, point-of-view and governance structure, and aggregation would be inappropriate. Meetings with First Nations suggest that some support the grizzly bear hunt, while others do not.

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Public Engagement

1. Background

In mid-August, the Government of BC announced that effective November 30, 2017, grizzly bear trophy hunting will cease throughout the province and that all hunting of grizzly bear will cease in the Great Bear Rainforest. Two policy intent papers were developed and posted to the Fish & Wildlife website on October 2, 2017.

The Ministry of Forests, Lands, Natural Resources Operations & Rural Development (FLNRORD) announced a public and stakeholder engagement process was announced with the posting of the policy intent papers. The process extended until November 2, 2017.

2. Purpose

The purpose of this section of the engagement report is to provide a summary of the results of the public engagement process.

3. Methods

3.1. Information out

The policy intent papers (Appendix A) were posted to the Fish & Wildlife website (Appendix B) in a downloadable PDF format and participants in the engagement process were invited to comment on the papers by sending their input to the email address: grizzly.bear@gov.bc.ca. They were also asked to comment on the following five points:

- Changes to manage the ban in hunting areas that overlap the Great Bear Rainforest
- Changes that will prohibit the possession of "trophy" grizzly bear parts
- Changes that will manage prohibited grizzly bear parts
- Changes to prohibit the trafficking of grizzly bear parts
- New reporting requirements for taxidermists

Following the government's announcement on August 14, 2017 (Appendix C), there was considerable media around the grizzly bear trophy hunt.

With the posting of the policy intent papers, the provincial government issued an Information Bulletin on October 3, 2017 (Appendix D) that generated additional media coverage.

Many interest groups re-posted information about the announcement, the policy papers and how to get involved in the engagement process on their websites, in emails and newsletters, and via social media.

On October 24, 2017, the Auditor General of BC released a report titled "An Independent Audit of Grizzly Bear Management." The report generated considerable media attention and resulted in an increase in emails to the grizzly bear trophy hunt address.

3.2. Email input

A total of 4,180 emails were received at grizzly.bear@gov.bc.ca. These were treated in one of three ways:

- Submissions from one of several form letters (Appendix E) were tracked and counted. Key points of concern and support were identified, and rolled into the discussion section of each issue area.
- Simple emails (*e.g.*, that simply said “ban the hunt” or “don’t stop the hunt”) were also tracked and used in the overall tallies of support or opposition to the regulations.
- Emails with content were individually numbered and placed into a qualitative online analysis software (Dedoose). To protect privacy, email and street addresses were stripped before uploading. A record of emails was kept in a separate Excel file, which also helped to identify duplicate respondents. Duplicate submissions were later removed.

3.3. Analysis

Each email in Dedoose was carefully read and coded to capture key messages from the respondent, and was assigned one of the following seven broad “level of support” categories:

- Support banning ALL grizzly bear hunting
- Do not support banning ALL grizzly bear hunting
- Support banning trophy hunting
- Qualified support for banning trophy hunting
- Opposed to banning trophy hunting
- Qualified opposition to banning trophy hunting
- Not specified

Where possible, the respondent was identified by their region (using the FLNRORD regions) and their affiliation (*e.g.*, guide outfitter, hunter). Many of the respondents did not identify their region or their affiliation as this information was not requested as part of the process. Therefore, there are a large number of respondents whose region is “unidentified” (approximately 63%) and who are identified as “individuals” (approximately 84%). This limits the ability to provide useful analysis of perspectives summarized by region or affiliation.

Each email was coded depending on several different issue areas mentioned and how people felt about them. Issue areas including such things as habitat, grizzly bear management, economics, First Nations hunting, etc. These issue areas are identified and discussed in Section 4.3.

4. Results

4.1. Note on quantification

Any quantification of the results in this engagement process need to be interpreted with a great deal of caution. Those participating in the engagement do not constitute a representative sample of the community or the province at large. Participants represent those who learned about the engagement process and decided to participate in it. Hence they are “self-selected” and they are not randomly selected, and do not constitute a statistically significant sample.

4.2. Overview

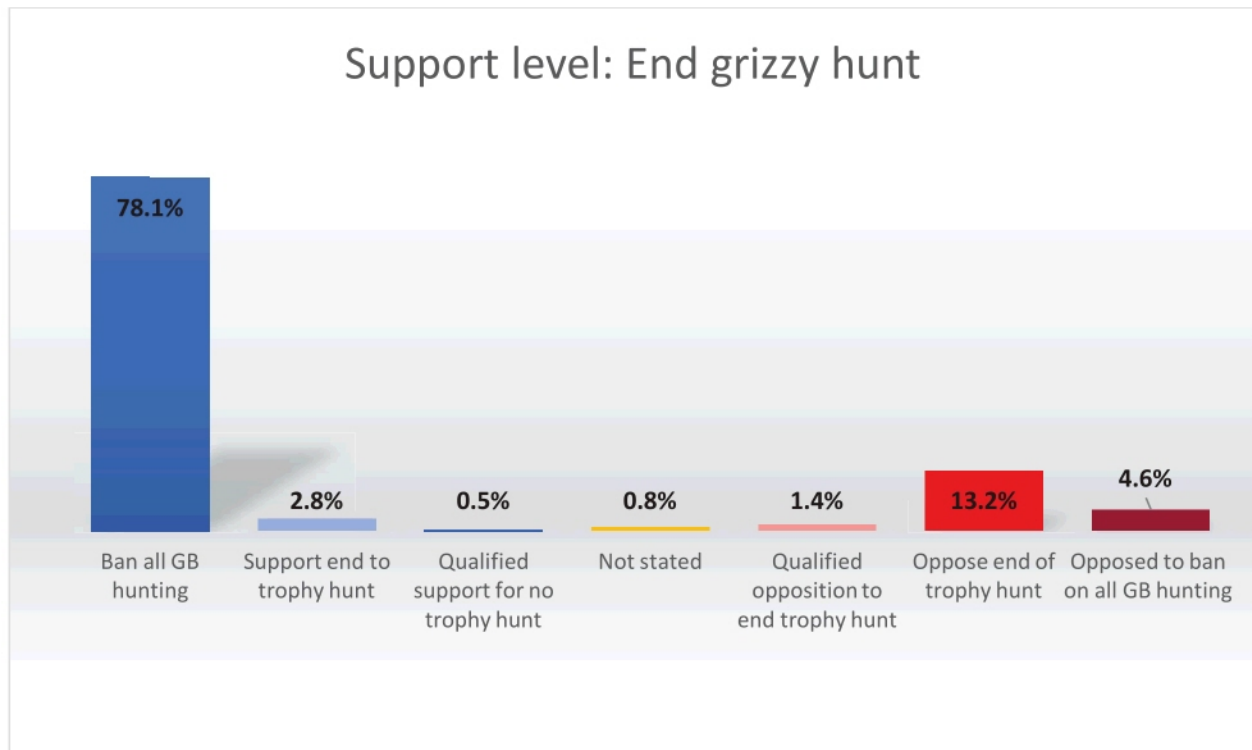
A total of 4,180 emails was received, which included 1,765 emails based on form letters published by interest groups.

Analysis of the broader content of the emails revealed responses that were categorized into seven main areas (Figure 1). The overwhelming largest response (78%) was “to ban grizzly bear hunting in all parts of the province” (in subsequent sections these respondents will be referred to as Group 1). The second highest response was those who opposed the end of the trophy hunt (13.2%) (referred to as Group 2), followed by those who opposed banning grizzly bear hunting anywhere in the province (4.6%).

Very few respondents (less than 3%) simply supported the ban on the trophy hunt as proposed. Respondents tended to be emphatic that this did not go far enough (it should be a total ban on all grizzly hunting, not just in the Great Bear Rainforest), or conversely that banning the trophy hunt was a bad idea for reasons related to economic contributions, a long history of hunting, grizzly bear population management, etc.

Two other smaller categories were: “Qualified support for no trophy hunt” (0.5%), which means respondents supported the proposed regulations with some modifications; and “Qualified opposition to end trophy hunt” (1.4%), which means respondents were opposed to the regulations but they qualified their opposition by saying that they supported one or two sub-sections of the regulations.

Figure 1 Frequency of public responses to grizzly bear trophy hunting regulations (N=4,180)



Of those respondents who supported banning all grizzly hunting in BC (Group 1), the most frequent reasons in descending order of importance were:

- Too many loopholes in the regulations as proposed
- Nobody (or almost nobody) eats grizzly bear meat
- Grizzly bear population is endangered
- Increasing value of eco-tourism and bear watching to the economy
- Full ban is the only way to end the trophy hunt
- Hunting such an iconic species is unacceptable in this day and age

s.21

Of those respondents who want the grizzly bear hunt to continue (Group 2), the most frequent reasons in descending order of importance were:

- Grizzly management should be based on science, not emotion and politics
- Hunting is an important population management tool
- Grizzly bear populations are mostly healthy

- There will be more human-bear conflicts if there is less hunting
- Other ungulate populations will be negatively affected if the hunt is stopped
- Hunting is important to the economy

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Most email respondents did not respond to the specifics in the policy intent papers but were more concerned with broader policy implications.

Emails included some very thoughtful opinions from all sides of the issue, as well as very emotional pleas from individuals with a pro- or anti-grizzly bear hunt stance.

4.3. Issue Areas

This section discusses the primary issues raised by respondents, roughly in descending order of frequency of mention.

4.3.1. Hunt is no longer appropriate

Many respondents in Group 1 refer to grizzly hunting as cruel and barbaric, something that is no longer appropriate in 2017. Several respondents spoke of the fact that most trophy hunters were “foreigners,” primarily “Americans.” A few people stated that if there was going to be hunting in BC, it should only be conducted by residents.

A large number of participants who support banning the grizzly bear hunt feel that all the resources would be better placed into conservation efforts for the species, particularly given the grizzly bear’s “keystone predator” role in the ecosystem.

4.3.2. Too many loopholes

A large number of respondents, the majority of whom were in Group 1, said that the proposed regulations had too many loopholes. They said that trophy hunters, like most bear hunters, had no interest in eating the meat, and that for many hunters, a photo was enough of a trophy, thereby rendering the requirement to take the meat from the forest irrelevant. It was felt that packing the meat out was not practical and that most hunters would not be interested in doing that. Also, participants said that bringing the trophy parts into the government office was onerous and would probably not happen, mostly because enforcement would be inadequate.

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4.3.3. Wasteful to leave anything behind

Many respondents, both in Group 1 and Group 2, agreed that there should be an effort not to waste any of the animal if it is harvested/killed.

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4.3.4. Hunt should be based on science

Many people in Group 2 said that the decision was based on emotion, not on science. Many of the same group also said that the decision was purely political, that it was designed to “buy votes” in urban areas.

Both groups felt that the hunt should be “based on science.” Group 1 cited studies showing the bear population is endangered. Group 2 felt that the hunt is a sustainable process, based on solid information.

Part way through the engagement process, the Auditor General of BC released a report on grizzly bears that was fairly critical of past management practices. A number of respondents referred to this report and outlined the need for better management of grizzly bears in the province. Both Group 1 and Group 2 respondents mentioned one of the principal conclusions of the report — habitat loss is more of a problem for grizzly bears than hunting. Group 1 concluded from this that it made sense to eliminate as many different grizzly bear mortality factors as possible. Group 2 concluded that hunting was not the problem, so the regulatory management focus should be on habitat loss.

4.3.5. The grizzly bear meat hunt

Many respondents raised the issue that there was very little interest in eating bear, especially the older grizzly bears that are targeted in the trophy hunt, because they do not taste good. A smaller number of respondents said that they eat the meat of grizzly bear and like it.

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4.3.6. Economics

Many participants raised the issue of economics of grizzly bears, both in terms of the value of the hunt and the value of the bear-viewing industry.

- Group 1 said that eco-tourism and bear viewing was good for the economy and created jobs, and that this is a growing industry that fits the international image of “Super, Natural BC.”
- Group 2 said that hunting and the economic spin-offs from hunting (guiding, guide outfitters, accommodation providers, etc.) was important to the rural economy and jobs.

4.3.7. Hunting as a management tool

Many hunters spoke of the need to continue the grizzly bear hunt as it is an important tool to manage the bear population. They cited multiple reasons for this need:

- If the hunt ends, there will be more bear-human interactions and more people will be injured or killed
- If the hunt ends, grizzly bears will kill more cubs, thus negatively impacting grizzly bear populations
- If the hunt ends, grizzly bears will kill more wildlife such as elk, deer, moose and caribou and have a negative impact on those ungulate populations
- Most of the grizzly bear population numbers are healthy, so a managed hunt is sustainable and justified
- Killing of grizzlies allows for the collection of scientific data to learn more about the populations and manage them better

A few respondents spoke to the ability of hunting to address grizzly bear populations sub-regionally by releasing the “right” number of Limited Entry Hunt (LEH) authorizations per sub-region.

4.3.8. Population dynamics of grizzly bear

There were varying opinions as to whether grizzly bear populations in BC were endangered or not, with both sides of the issue citing personal experience and/or “scientific” studies. Respondents in Group 1 said that grizzly bears were at risk and hence that was another reason to stop the hunt. Respondents in Group 2 said that populations were growing and that they were not in danger; many providing stories of seeing more grizzlies in their area in recent years.

4.3.9. Habitat of the grizzly bear

Participants from all viewpoints stressed the importance of quality habitat for grizzly bears and agreed that lack of suitable habitat was a problem. As mentioned previously, habitat and hunting were prioritized differently by Group 1 and Group 2 respondents.

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4.3.10. Urban/rural split

A number of participants suggested that there is a philosophical urban/rural split of people regarding the hunting of grizzly bears, with rural dwellers citing a lack of understanding by urban dwellers of the realities of living in grizzly country, and the role played by hunters in conservation. Some respondents suggested that urban dwellers were primarily driven by emotion and politics. They went further to suggest that “southerners” and “city people” should not be making decisions about something they don’t know anything about.

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4.3.11. Great Bear Rainforest hunting closure

Many respondents congratulated the government on its decision to close the Great Bear Rainforest. Almost all the respondents who supported the hunting closure in the Great Bear Rainforest went on to say that they wanted the closure to be extended to the entire province.

Respondents who did not support the Great Bear Rainforest hunting closure cited the same reasons that they don't support stopping the trophy hunt in other parts of the province.

4.3.12. Hunting by First Nations

Some respondents were concerned that First Nations are allowed to hunt when other British Columbians are not. They called for a "level playing field" for Aboriginal and non-Aboriginal British Columbians. Other respondents supported allowing a hunt by First Nations and in particular, many respondents in Group 1 said that although they want a province-wide ban, they were supportive of First Nations hunting for food, social and ceremonial (FSC) purposes.

4.3.13. Enforcement

A number of respondents commented on enforcement aspects of the proposed regulations. The reporting requirements for taxidermists were supported by several respondents although it was felt that confirming where the bear was killed would be difficult. Some respondents noted that the Conservation Officer Service needed to be better funded to improve enforcement. They said that there were not enough Conservation Officers in BC to enforce the regulations, police poachers and stop illegal trafficking in bear trophy parts. Several people indicated that without improvements to the Conservation Officer Service, the best approach to stopping trophy hunting was to ban the hunt altogether.

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Many respondents believe that poachers should receive higher fines and stiffer sentences.

4.3.14. Trophy terminology

A number of respondents expressed concern that the term "trophy" was not well defined and that the word is a media term that has been used to build public support against the hunt.

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4.4. Comments on the proposed regulations

The vast majority of emails did not address the specifics of the proposed regulations. Those that did comment offered the following thoughts, discussed in Section 4.4.1 to 4.4.6.

Many respondents in Group 2 said that the grizzly hunt should be managed like the black bear hunt, where all the meat (along with the trophy parts) must be taken out of the bush.

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4.4.1. Regulation: prohibit possession of grizzly bear parts

Although not many respondents addressed the specific regulations, many respondents were opposed to this particular regulation. All of those who were against this regulation were supportive of the trophy hunt, and they particularly wanted to be able to keep the head, hide and paws. Many felt the prohibition would result in waste of parts that they normally use, but this was in part based on the notion that all bear parts would be left in the woods, which is only one of three options (see 4.4.3.). Those respondents opposed to this regulation were also those who did not support the trophy hunt or all bear hunting.

4.4.2. Regulation: expand definition of edible portions and require them to be removed

The first part of this regulation addresses expanding the edible portions to include the neck and ribs. Very few respondents commented on this aspect. On the second aspect of this regulation — requiring parts to be removed — all respondents who mentioned this were in support of it.

s.21

4.4.3. Regulation: managing prohibited grizzly bear parts

Of the respondents who addressed this aspect of the regulation, most supported taking all the trophy parts out of the forest (option 1), as opposed to leaving the parts in the forest (option 2) and only removing the parts with scientific value (option 3). Although not specifically addressing the regulation, a number of respondents commented on the logistical problem of transporting heavy bear parts long distances in order to have them inspected. They said it was time consuming, and could lead to spoilage of the meat.

4.4.4. Regulation: prohibition on the trafficking of grizzly bear parts

A total of 100 respondents mentioned trafficking of grizzly bear parts and were overwhelming in favour of stopping the illegal trade, but they did not comment specifically on the proposed regulation that expands the ban on trafficking to include all grizzly bear parts.

4.4.5. Regulation: importation and exportation of grizzly bear parts

Generally, respondents did not single out this regulation as they seemed most concerned with the illegal trafficking of bear parts.

4.4.6. Regulation: reporting requirements for taxidermists

Almost all the respondents on this aspect of the regulations indicated that they supported reporting requirements for taxidermists.

4.5. Engagement Process

A number of concerns about the timing and nature of the engagement process were raised. Several respondents were concerned that the process began before the release of the Auditor General's report. They felt that the engagement process could have benefitted from the Auditor General's conclusions. A small number of participants felt the engagement process was poorly advertised and that decisions seemed to be already made.

s.21

5. Discussion

s.13

Stakeholder Engagement

1. Background

In mid-August, the Government of BC announced that effective November 30, 2017, grizzly bear trophy hunting will cease throughout the province and that all hunting of grizzly bear will cease in the Great Bear Rainforest. Two policy intent papers were developed and posted to the Fish & Wildlife website on October 2, 2017.

2. Purpose

The purpose of this section of the engagement report is to provide a summary of the results of engagement with key stakeholder groups.

3. Methods

Emails and letters were sent to the ministry's key stakeholder list (see table below). Emails and letters were sent to a prepared list of taxidermists, tanners and fur traders taken from permit applications and hunting synopsis ads. Letters and emails were also sent to all guide outfitters offering an opportunity review and respond to the policy intent papers.

Meetings with key stakeholder groups were held in-person and via conference call. Detailed notes were taken at the meetings. A list of meetings is presented in the table below.

Sector / Groups	Date
<i>Provincial Hunting and Trapping Advisory Team (PHTAT) Meeting</i> 1. BC Trappers Association 2. BC Wildlife Federation 3. Guide Outfitters Association of BC 4. United Bowhunters of BC 5. Wildlife Stewardship Council 6. Wild Sheep Society of BC	Oct 13, 2017 9 – 11:30 am
<i>Environmental Non-Government Organizations (ENGO) Meeting</i> 7. Coast to Cascades Grizzly Bear Initiative 8. David Suzuki Foundation 9. Grizzly Bear Foundation 10. Raincoast Conservation Foundation 11. Wilderness Tourism Association of BC	Oct 13, 2017 1:30 – 4 pm
12. Commercial Bear Viewing Association of BC	Oct 12, 2017 11 am-12 pm
13. BC Cattlemen's Association	Nov 10, 2017 2 – 3 pm
14. BC Nature Alan Burger	Oct 16, 2017
15. International Humane Society	Sept 18, 2017

For a detailed engagement summary, please see Appendix F. Letters were received from most of these key stakeholder groups as well as additional stakeholder organizations from across the province. Letters were summarized and the points themed by subject area.

4. Results

4.1. FLNRORD's key stakeholders

Meetings were held with all of the FLNRORD's 13 key stakeholders.

Eight letters were received from FLNRORD's key stakeholders (See Appendix F):

- BC Wildlife Federation
- Guide Outfitters Association of BC
- United Bowhunters of BC
- David Suzuki Foundation
- Grizzly Bear Foundation
- Raincoast Conservation Foundation
- Commercial Bear Viewing Association of BC
- BC Cattlemen's Association

Some of the key ENGO stakeholder groups were also listed as one of 45 signators on a letter titled "Open Letter to the BC Government Opposing the Grizzly Bear 'Meat Hunt'" (See Appendix G).

4.1.1. Summary of meeting with and written submissions from FLNRO's environmental non-governmental organizations (ENGO) key stakeholders

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Page 040 to/à Page 045

Withheld pursuant to/removed as

s.21;s.13

First Nations Engagement

1. Background

In mid-August, the Government of BC announced that effective November 30, 2017, grizzly bear trophy hunting will cease throughout the province and that all hunting of grizzly bear will cease in the Great Bear Rainforest. Two policy intent papers were developed and posted to the Fish & Wildlife website on October 2, 2017.

FLNRORD acknowledges that grizzly bear hunting may be of significant interest to many First Nations across BC and sought to share information and receive comments on how the prohibition on possession of grizzly bear trophy parts could be implemented and on other associated policy (definitions of “trophy parts” and “edible portions”; approaches for managing prohibited bear parts; prohibition on trafficking of grizzly bear parts, etc.) that will inform regulatory changes.

The prohibition on possession of grizzly bear trophy parts will not apply to First Nations who harvest grizzly bears within traditionally used areas pursuant to aboriginal rights for food, social, or ceremonial (FSC) purposes, or treaty rights. FLNRORD acknowledges many First Nations across BC have expressed interest in grizzly bear hunting and guide outfitting.

2. Purpose

The purpose of this section of the engagement report is to provide a summary of the results of engagement with First Nations.

3. Methods

Emails were sent on September 27 and 28, 2017 to more than 200 First Nations across the province including First Nations with signed treaties regarding the grizzly bear trophy hunting ban.

Emails were also sent September 27 and 28 to the 41 First Nations that either overlap or are adjacent to the Great Bear Rainforest (as defined by the Great Bear Rainforest Land Use Order) regarding the grizzly bear hunting closure in the Great Bear Rainforest. Staff set up engagement meetings with:

- All 41 First Nations that either overlap or are adjacent to the Great Bear Rainforest on October 12, 17 and 18, 2017 (no callers took part in the October 12 and 17 conference calls)
- Three conference calls with all First Nations on the trophy hunt ban on October 12, 17 and 18, 2017
- The Gitksan First Nation on October 11, 2017
- The Nisga’a First Nation on October 10, 17, 31 and November 4, 2017
- The Tsilhqot’in First Nation on October 10, 2017
- **s.14,s.16**
- Coastal First Nations representatives on November 1, 8 and 9, 2017
- Representatives of the Gitanyow on November 3, 2017

In the original September 27 and 28, 2017 emails, First Nations were invited to provide comments on the proposed regulatory changes via email to FirstNationsEngagement@gov.bc.ca.

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Page 048 to/à Page 052

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Page 053 to/à Page 061

Withheld pursuant to/removed as

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Appendix B FLNRORD Website

BRITISH COLUMBIA

Search **Go** [Advanced Search](#) | [Help](#) | [Contact Us](#) Text Size

☐ All B.C. Government ☒ Forests, Lands and Natural Resource Operations

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B.C. Home » [FLNRORD](#) » [Fish and Wildlife](#) [Printer Version](#)

Ministry of Forests, Lands and Natural Resource Operations

Fish and Wildlife Branch

Province seeking feedback from the public on proposed grizzly bear hunting regulations

On Aug. 14, 2017, the B.C. government announced that effective Nov. 30, 2017 it will end trophy hunting of grizzly bears and stop all hunting of grizzly bears in the Great Bear Rainforest.

The public can provide input into [two policy documents](#) outlining the proposed regulation changes required to implement the ban.

As part of the consultation, input is being sought on:

- Changes to manage the ban in hunting areas that overlap the Great Bear Rainforest;
- Changes that will prohibit the possession of "trophy" grizzly bear parts;
- Changes that will manage prohibited grizzly bear parts;
- Changes to prohibit the trafficking of grizzly bear parts; and,
- New reporting requirements for taxidermists.

Members of the public may send comments to the Fish and Wildlife Branch at grizzly.bear@gov.bc.ca.

When a comment is sent, the writer will receive an email back confirming that the response has been received. Due to the expected volume of material, individual response will not be possible.

The consultation period will conclude on November 2, 2017.

Regulations Synopses

- » Freshwater Fishing
- » Hunting & Trapping
- » Limited Entry Hunting
- » Latest In-Season Fisheries Regulation Changes

Freshwater Fishing e-Licensing

Controlled Alien Species Regulation

New Angling, Hunting and Trapping Engagement Website

Popular Topics

- » Electronic Licensing Information
- » Skeena Quality Waters Strategy
- » Hunter Recruitment & Retention Strategy [PDF 2.04MB]
- » Wild Bird Mortality

B.C. Home

Forests, Lands and Natural Resource Operations

Fish and Wildlife

- » Fish
- » Wildlife
- » Habitat
- » Wildlife Act Review
- » FrontCounter BC
- » Regional Offices
- » Contact Us
- » Site Map
- » News Updates

RESOURCES

- » BC Parks
 - » Park Use Permit Information
- » Ecosystems
- » The Ecological Reports Catalogue
- » Conservation Officer Service
- » Government Agents / Service BC
- » FrontCounter BC

DOCUMENTS

- » VISA/Mastercard Payment Authorization Form
- Certificate of Insurance:
 - » Fish and Wildlife
 - » Parks

Appendix C Provincial Government News Release August 14, 2017



NEWS RELEASE

For Immediate Release
2017FLNR0232-001442
Aug. 14, 2017

Ministry of Forests, Lands, Natural Resource Operations
and Rural Development

B.C. government putting an end to the grizzly bear trophy hunt

VICTORIA – Effective Nov. 30, 2017, the British Columbia government will end grizzly bear trophy hunting throughout the province and stop all hunting of grizzlies in the Great Bear Rainforest, Forests, Lands, Natural Resource Operations and Rural Development Minister Doug Donaldson announced today.

“By bringing trophy hunting of grizzlies to an end, we’re delivering on our commitment to British Columbians,” Donaldson said. “This action is supported by the vast majority of people across our province.

“In particular, we owe it to generations past and future to do all we can to protect the beauty and uniqueness of the Great Bear Rainforest. We believe the action we’re taking goes beyond the commitment to Coastal First Nations made as part of the 2016 Great Bear Rainforest agreements.”

There are an estimated 15,000 grizzly bears in British Columbia. Each year, approximately 250 are taken by hunters. While the trophy hunt will end, hunting for meat will be allowed to continue.

During the fall months, Donaldson said that government will consult with First Nations and stakeholder groups to determine next steps and mechanisms as B.C. moves toward ending the trophy hunt. Additionally, government will be moving forward with a broader consultation process on a renewed wildlife management strategy for the province.

“The key elements of that strategy will include dedicated funding for wildlife and habitat conservation and a collaborative process in developing short and long-term plans for wildlife resources,” Donaldson said.

Contact:

Media Relations
Ministry of Forests, Lands, Natural Resource
Operations
and Rural Development
250 356-5261

Connect with the Province of B.C. at: www.gov.bc.ca/connect

Appendix D Provincial Government Information Bulletin October 3, 2017

Government to consult on grizzly bear ban | BC Gov News

<https://news.gov.bc.ca/releases/2017FLNR0316-001676>

British Columbia News

Government to consult on grizzly bear ban

<https://news.gov.bc.ca/15531>

Tuesday, October 3, 2017 2:00 PM

Victoria - British Columbians are being given the opportunity to provide input on new proposed grizzly bear regulations.

On Aug. 14, 2017, the B.C. government announced that effective Nov. 30, 2017 it will end trophy hunting of grizzly bears and stop all hunting of grizzly bears in the Great Bear Rainforest.

Until Nov. 2, the public can provide input into two policy documents outlining the proposed regulation changes required to implement the ban.

As part of the consultation, input is being sought on:

- Changes to manage the ban in hunting areas that overlap the Great Bear Rainforest;
- Changes that will prohibit the possession of “trophy” grizzly bear parts;
- Changes that will manage prohibited grizzly bear parts;
- Changes to prohibit the trafficking of grizzly bear parts, and
- New reporting requirements for taxidermists.

The two policy documents can be reviewed at: <http://www.env.gov.bc.ca/fw>

Members of the public may send comments to the Fish and Wildlife Branch at: grizzly.bear@gov.bc.ca

When a comment is sent, the writer will receive an email back confirming that the response has been received. Due to the expected volume of material, individual responses will not be possible.

Contacts

Media Relations

Ministry of Forests, Lands, Natural Resource Operations and Rural Development
250 356-5261

Appendix E Form letters

The Hon. John Horgan,
MLA Premier of BC
Parliament Buildings
Victoria, BC V8V 1X4

Dear Premier Horgan:

I am writing to protest the blatantly political ban on grizzly bear hunting. My family and I are hunters and we see this decision as directly threatening our way of life.

This ban is just grandstanding. Numerous independent scientific studies have confirmed that grizzly bears are not endangered in BC. Your decision launches the government down a "slippery slope." Should hunting regulations depend upon whatever species some well-funded gang can single out to raise money? What's next, eliminating black bear hunting? Banning hunting or trapping of wolves? All predators? Deer?

I support Harvey Andrusak, President of the *BC Wildlife Federation*, who said, "The province must maintain a science-based hunt to determine if there is a sustainable harvest which includes the opportunity for hunters to utilize all portions of any animal or fish harvested. We cannot be managing fish and wildlife on a one-off basis. All wildlife management must be consistent with science-based recommendations."

Conservation, fishing and hunting are important to my family and to future generations. I support the North American Wildlife Conservation Model which relies upon hunting, trapping and angling (or sport fishing) for a balanced approach to conservation. This model has sustained wildlife populations in North America for more than 100 years.

Instead of arbitrarily playing politics, I urge the government to accept a regional roundtable approach, such as the BCWF has long advocated, with specific conservation measures and social considerations discussed with residents, First Nations, commercial and recreational sector representatives before wildlife management policy is changed or adopted.

Thank you for considering my comments. I look forward to your reply.

Print name:

Cordially,

Address:

Postal code:

Copy to:

MLA
Parliament Buildings
Victoria, BC V8V 1X4

From:
To: <grizzly.bear@gov.bc.ca>
Cc:
Bcc:
Date: Sun, 22 Oct 2017 21:13:12 -0400
Subject: Grizzly bears management
To whom it may concern:

It is my opinion that managing the hunting of grizzly bears and the harvesting and trafficking of the various trophies, parts, or meat of their carcasses cannot be effectively accomplished within British Columbia at this time. Without significant increases to the resources of the Conservation Officer Service and their counterparts at the Ministry of Forests, Lands, and Natural Resource Operations, there is simply no manner of ensuring any policy allowing for some harvesting of grizzly bear trophies, parts or meat. Additionally, long-standing questions regarding the models and research used to make policy decisions on grizzly bear hunting have not been answered (see [recommendations from the Scientific Review of Grizzly Bear Harvest](#) and the [yet-to-be delivered report from the Auditor General](#)).

How this will interfere with the thriving grizzly bear viewing industry is also not included in your policy papers - a critical oversight.

In conjunction with these vital issues on the conservation and science side, the lack of resources to properly manage the hunt, and the overwhelming shift in societal views on hunting grizzly bears, all grizzly hunting should cease in the province.

Sincerely,

From:

Date: Wed, 1 Nov 2017 13:08:06 -0700

Subject: Grizzly Bear Meat Hunt Regulations

To whom it may concern,

I am writing to thank you for following the lead of the Coastal First Nations and banning the trophy hunting of grizzly bears in British Columbia, as well as banning all hunting of grizzlies in the Great Bear Rainforest. While I do not agree with the need for the meat hunt of grizzlies, I understand that you are asking for insight on the regulations for the meat hunt and not for my opinion on if it should be done at all. So I will try to keep this focused on the regulations around the meat hunt.

Several of the current hunting areas that overlap with the Great bear Rainforest. As there is no longer any grizzly bear hunting allowed in that area, I propose new lines be drawn for these hunting areas, so the Great bear Rainforest can be completely devoid of potential hunters. This way, there is no reason for a hunter to be out there, so poachers will not have a viable reason to be in that region, and borders can be more easily patrolled by park rangers,

As for the possession of “trophy” grizzly bear parts, it will be difficult to discern between grizzly bear “trophy” parts that were harvested before the ban, and parts that might have been taken after the ban. To combat this, I recommend all current owners of grizzly bear “trophies” register their parts and the dates they were harvested, so further confusion and misunderstanding can be avoided. Anyone who owns grizzly parts and is not registered on this database could be a potential suspect for illegal poaching. People who harvested grizzly bears before the ban should not be made to give up their “trophies” as it was technically legal, even though it may not have been ethical. However, I believe that no grizzly bear parts should be able to be sold or even given away. This will limit the potential black market opportunities on the grizzly parts because there will be no legal loophole for the grizzly parts to be sold. Because of this, the demand for grizzly “trophy” parts will die down and the grizzlies would be further protected from potential poaching.

Taxidermists, on their part, should be legally required to notify officials if someone tries to get grizzly parts taxidermied and are not on the database I spoke of previously. If a taxidermist fails to do so, there should be consequences for both the taxidermist and the potential poacher in

the form of a fine, or even jail time. However, taxidermists should not be threatened, so to speak, with these consequences, as it would not be wise to turn them against the government.

Grizzly bears have been in my life ever since I could remember. The memory of these wildly beautiful and majestic creatures have been ingrained into my mind since I first laid eyes on them when I was a child, from watching them on the big screen to reading about them in picture books. Grizzly bears have been an item of mystery and wonder for humans for generations upon generations. They have an impact on anyone who is lucky enough to gaze upon them. Conserving these animals is our duty, losing them would be a tragedy greater than I wish to imagine. Their role in our ecosystem is also a matter of utmost importance. Grizzly bears are a keystone species, and that applies especially here in British Columbia. They help keep prey populations healthy and under control. Not to mention the fact they help spread nutrients through the forest in the form of salmon they catch in the rivers. Grizzlies are essential to both our environment and our souls. Protect our grizzlies, do not let this be the end of them.

Thank you for your consideration,

Submitted on Thursday, October 12, 2017 - 20:28 Submitted by anonymous user: 172.31.47.41
Submitted values are:

==Send a Message==

First Name:

Last Name:

Email Address:

City:

Postal Code/ZIP:

Province / State:

Country:

Subject: Ban the Grizzly Bear Trophy Hunt

Your Message:

To:

Honourable Premier John Horgan, Provincial Government of British Columbia

Honourable Minister Doug Donaldson, Minister of Forests, Lands, Natural Resources, and Rural Development

Honourable Minister Lisa Beare, Minister of Tourism, Arts, and Culture

Honourable Minister George Heyman, Minister of Environment and Climate Change Strategy

Honourable Scott Fraser, Minister of Indigenous Relations and Reconciliation

I am writing to thank you for following the lead of Coastal First Nations in banning grizzly bear hunting in the Great Bear Rainforest, and for listening to the vast majority of British Columbians by moving forward to protect grizzly bears from trophy hunting in other areas of B.C.

However, I do not support a meat hunt for grizzlies in other parts of the province. This loophole will be too difficult to enforce given the lack of conservation officers in the province, will likely encourage poaching, and weakens the intention of a ban, which should be to protect these vulnerable animals from exploitation. Grizzly bears are listed as a Species of Special Concern in B.C. because of their slow reproduction rate (the lowest among North American land mammals), ongoing and rapid loss of habitat, declining salmon stocks, and high numbers of road and rail kills. They should not be killed for food or for trophies.

Grizzlies have been extirpated from much of their historical habitat and population estimates are a point of debate. Not only do independent scientists question the models used to estimate grizzly populations throughout the province, suggesting the models inflate grizzly bear numbers, but a recent peer-reviewed study found that the provincial government is failing to keep grizzly bear mortality below its own targets in some regions. Previous governments have done an abysmal job of protecting grizzly bear habitat.

Economically, B.C.'s grizzly bear trophy hunt threatens a sustainable and revenue-generating industry. Eco-tourism and bear viewing attract thousands of people to B.C. every year, create sustainable employment, and generate far greater revenue than bear hunting. Grizzly bear hunting directly impacts bear viewing in areas where they overlap.

Please put a stop to all grizzly bear hunting throughout the province now, and tell us how your government intends to protect, restore, and manage habitat for grizzlies and other species at risk.

I look forward to your response and welcome the opportunity to speak with you further via a call or meeting.

Sincerely,

[Your Name]

Updates and Alerts from Pacific Wild:

The results of this submission may be viewed at:

<https://pacificwild.org/node/1203/submission/15960>

Appendix F Summary of Engagement

CONSULTATION/ENGAGEMENT LOG GRIZZLY BEAR HUNT UPDATED NOV 15, 2017

	DATES
INTERNAL GOVERNMENT	
Regional staff – DRMs, Section Heads, select REDs related to GBR	Sept 11, 2017 (Section Head call, emails, phone calls) Oct 26, 2017 (2 nd Section Head call)
ENV Alec Dale Peter Trotzki Alicen Chow	Sept 29, 2017: 9:30am
COS Doug Forsdick, Chief	Sept 29, 2017: 1:00pm Oct 26, 2017: 9:30am
FLNRORD Regional Economic Operations Branch Sarah Fraser, ED	Oct 27, 2017: 1:00pm
BC Parks Ken Morrison	Oct 2, 2017: 9:30am
JTST Amber Mattock, Director	Oct 27, 2017: 1:00pm
Habitat Conservation Trust Fund (HCTF) Aaron Bremner Brian Springinotic	Oct 31, 2017: 9:30am
FIRST NATIONS	
s.13,s.16	

STAKEHOLDERS

<i>“PHTAT Meeting”</i> BC Trappers Association BC Wildlife Federation Guide Outfitters Association of BC United Bowhunters of BC Wildlife Stewardship Council Wild Sheep Society of BC	Oct 13, 2017: 9-11:30am
<i>“ENGO Meeting”</i> Coast to Cascades Grizzly Bear Initiative David Suzuki Foundation Grizzly Bear Foundation Raincoast Conservation Foundation Wilderness Tourism Association of BC	Oct 13, 2017: 1:30 – 4pm
Commercial Bear Viewing Association of BC	Oct 12, 2017: 11:00am
BC Cattleman’s Association	Nov 10, 2017: 2:00pm
BC Nature Alan Burger	Oct 16, 2017: 9:00am
International Humane Society	Sept 18, 2017
PUBLIC	
Public Comments	Information posted to website on Oct 2, 2017 Comment period closed Nov 2, 2017
TAXIDERMISTS, TANNERS & FUR TRADERS	

Prepared list List taken from permit applications & hunting synopsis ads	Emailed/mailed Sept 25, 2017
s.22	Nov 2, 2017: 4:00pm
GUIDE OUTFITTERS	
Letters sent to all GOs offering opportunity to review and respond to policy intent papers	Emailed/mailed Sept 26, 2017

Page 074 to/à Page 097

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Appendix H Open letter from 45 stakeholder groups

OPEN LETTER TO THE BC GOVERNMENT OPPOSING THE GRIZZLY BEAR “MEAT HUNT”

Environmental Organizations

Applied Conservation GIS
Baden Cross

BC Nature
Dr. Alan Burger

Bears Matter
Barb Murray

Canadians for Bears
Ainslie Willock

Clayoquot Action
Bonny Glambeck

Craighead Institute
Dr. Lance Craighead

David Suzuki Foundation
Faisal Moola

DeerSafe
Kelly Carson

Friends of the Lardeau
Rhonda Batchelor

Friends of Nemaiah
Dave Williams

Justice for BC Grizzlies
Valerie Murray

Lifeforce Foundation
Peter Hamilton

Pacific Wild
Lindsay Marie Stewart

Purcell Alliance for Wilderness
Gary Diers

Save-the-Cedar League
Rick and Julie Zammuto

SeaLegacy

Stop the Grizzly Killing Society
Trish Boyum

The Fur-Bearers
Lesley Fox

Tourists against Trophy
Hunting, Judy Malone

Valhalla Wilderness Society
Wayne McCrory, R.P.Bio.

Wildlife Defence League
Tommy Knowles

Wolf Awareness Incorporated
Sadie Parr

Animal Welfare Organizations

Animal Advocates of BC
judy@animaladvocates.com

October 14, 2017

We, the undersigned 45 environmental and animal welfare organizations, wildlife-based businesses, and independent activists, are pleased that the current BC government is committed to end the trophy hunt of grizzly bears. However we strongly oppose the government's plans to allow continued grizzly bear hunting, under the pretext of hunting for meat, except for a jointly-regulated First Nations ceremonial/sustenance hunt. Part of the Great Bear Rainforest would have a total ban on hunting, but that's only a very small part of grizzly bear habitat in BC. We oppose the meat hunt for the following reasons:

1. Grizzly bears are a species at risk. They are blue-listed in BC, and threatened by poaching, human conflicts, habitat destruction and hunting. They have disappeared from 18% of their range in BC. (1) Out of 56 grizzly bear subpopulations in BC, 9 are classified as “threatened” by British Columbia.
2. We expect to see much trophy hunting continued under the guise of “meat” hunting. In the past, almost all grizzly bear hunting has been trophy hunting. Many hunters find the meat unpalatable. Grizzly bears were included by BC Fish & Wildlife with non-game animals such as wolverines, wolves and cougars. Previously, BC hunting regulations have had a provision allowing hunters to leave the meat on the ground and take only the trophy parts. People do not travel hundreds or thousands of kilometres, pay tens of thousands of dollars, and risk their lives shooting at grizzly bears to put meat on the table. The proposed new regulations for meat hunting will simply disguise trophy hunting as meat hunting. Even if the head, hide and claws are left on the ground, or given to a conservation officer, the hunter will take away trophy videos, photographs and bragging rights. The bears will still be killed for sport.

The BC government is considering various options to distinguish trophy hunting from meat hunting, but they only increase our conviction that this division is unenforceable. For many years BC has been unable to control substantial poaching of bears, how will it account for every trophy part of every bear shot by hunters?

3. The government has claimed the grizzly hunt is sustainable. However, independent biologists have been saying for years that this is not true. We do not even know with certainty how many grizzly bears there are in BC, or how many can be killed without reducing the population. Peer-reviewed studies by scientists have found numerous cases of too many bears being killed (by all causes), even according to the government's own population numbers. Studies have proven that hunters often kill too many female bears. The European Union investigated BC's grizzly bear hunt, ruled it environmentally unsustainable, and banned the import of trophies.
4. Closing the meat hunt in a limited area will concentrate hunting in other areas. While the government proposes to stop all grizzly bear hunting in part of the Great Bear Rainforest, this is only a small part of grizzly bear habitat across BC. Grizzly bear hunting in this area will simply move to other coastal and interior areas of the province.

Animal Alliance of Canada
Liz White

Animal Justice
Camille Labchuck

Animal Protection Party of Canada,
Liz White

BC SPCA
Dr. Sara Dubois

Humane Society International
/Canada, Julie MacInnes

Zoocheck Canada
Julie Woodyer

First Nations

First Nations Environmental Net-
work, Suzanne Lawson

Kwiah First Nation
Frank Voelker

Nature-based Businesses/ Scientists/Artists/Photographers

Dr. Barrie Gilbert
Research Ecologist
Utah State University

Cas Sowa
Photographer

Craig Wardle Photography
Craig Wardle

Ellie Lamb
Artist/Bear Viewing Guide

George Rammell
Grizzly bear activist

Great Bear Chalet
Jefferson Bray

Ocean Adventures Charter Co.
Eric Boyum

Kootenay Reflections
Photography, Jim Lawrence

Khutzeymateen Wilderness Lodge,
Jamie Hahn

Ocean Light II Adventures
Jenn Broom

Pacific Rainforest Adventure Tours
Inc., Ronda and Gary Murdock

Steve Williamson Photography
Steve Williamson

West Coast Wild Art
Leanne Hodges

In addition, the undersigned object to the following aspects of the public consultation process for the new grizzly bear hunting regulations.

1. The process only considers how to manage the meat hunt, not whether there should even be a meat hunt. Participants are forced to accept the meat hunt as fait accompli.
2. Poor public access to information. Only those who sign confidentiality agreements can have access to some important information. Only those willing to sign the confidentiality agreements can be "stakeholders", which receive priority consultation. The government has not released a complete list of stakeholders. The process was not advertised until recently, when it had already been running about a month, unbeknownst to many undersigned organizations. The confidentiality agreements represent muzzling of public organizations and suppressing information.

In June of this year, 23 organizations concerned with the welfare of wildlife sent a letter to the BC government that stated: "The wildlife of the province belongs to all British Columbians, and has by law been held by the government in trust." The letter came about because the provincial government had been giving hunting organizations and related businesses priority access to consultation on matters related to wildlife, resulting in glaring policy bias.

Today the undersigned organizations and businesses are seeking increased recognition by the government that BC wildlife belongs to all Canadians, who have an equal stake in how it is managed, and an equal right to relevant information. We expect proportionate representation in all provincial wildlife matters. BC has over 1,500 species at risk. Recognizing the worldwide biodiversity crisis, the management of our wildlife must shift away from maximizing how many animals hunters can kill, to the practice of conservation biology to ensure the survival of species at risk.

We hold that the upcoming Auditor General's report on the grizzly bear hunt — which was due to be released in September — is critical information for all parties to have before making decisions on this issue. Rushing to change the hunting regulations before the report is released wastes the tax dollars that have been spent to better inform decision-making. We urge the BC government not to authorize any further grizzly bear hunting until it has done a full review of public input and the soon-to-be released Auditor General's report.

Sincerely,
45 Signators

References

1. COSEWIC assessment and update status report on the Grizzly Bear of Canada, <https://www.registrelep-sararegistry.gc.ca/default.asp?lang=En&n=A32186C4-1&offset=9>
2. Artelle, K. A., Anderson, S. C., Cooper, A. B., Paquet, P. C., Reynolds, J. D., Darimont, C. T., "Confronting Uncertainty in Wildlife Management: Performance of Grizzly Bear Management," PLOS ONE, Nov. 2013, Vol. 8, <http://journals.plos.org/plosone/article/file?id=10.1371/journal.pone.0078041&type=printable>

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Appendix J Letters from First Nations



October 25, 2017

Provincial Government
Grizzly Bear Review Panel
Via Email: Grizzly.bear@gov.bc.ca

Jennifer Psyllakis
Director of Fish and Wildlife
Via Fax: 250 387-9568

Re: Stopping all hunting of grizzly bears in the Great Bear Rainforest

Coastal First Nations (CFN) applaud the BC NDP 's latest announcement to close the grizzly bear hunt in the Great Bear Rainforest (GBR). Bears are an integral part of our culture and our economy, and play an important role as an indicator species for ecosystem health. We have invested millions of dollars over the last decade in our bear research looking at population abundance and distribution, habitat and security, and impacts such as hunting, to make sure that we can continue to have bears in the Great Bear Rainforest.

This progressive and bold approach by the NDP government to close the bear hunt in the GBR directly supports local communities and local businesses as we continue to develop long-term sustainable economic opportunities in eco-tourism. This ban also supports our indigenous laws where we are taught to respect all wildlife, and is a welcomed step toward reconciliation for Coastal First Nations. Thank you for the opportunity to give input into the recent Policy Discussion Intent Paper entitled Stopping All Hunting of Grizzly Bear in the Great Bear Rainforest. Our responses to the intent paper are included below.

1. Management system sustainability

We want to bring your attention to the first statement in the intent paper, which we disagree with. The statement claims that "[t]he current management system for grizzly bear hunting in the Great Bear Rainforest is considered sustainable and the proposed closure is not a response to a conservation concern." We do not in any way believe the current management system for grizzly bear hunting in the GBR, or any part of the province, to be sustainable. We have shed light on this issue through our grizzly bear work and campaign over the past many years.

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As noted in the recent Auditor General's Report released in October 2017, there is currently no organized inventory and limited monitoring of grizzly bears populations in British Columbia. The province does not adequately account for uncertainty in populations and unreported mortalities, and is not transparent as to how it considers uncertainty when allocating hunting licences. In general the province does not use a precautionary approach in decision-making processes despite their data being limited.

2. Legislative Changes

We are concerned with the proposed legal changes to enact the closure of grizzly bear hunting in the GBR. It is suggested that the Limited Entry Hunt (LEH) seasons will be eliminated in the GBR (in particular wildlife management units). However, it is not clear the exact mechanism (e.g. section of the Wildlife Act or Regulation) that will be changed to eliminate the LEH seasons. Coastal First Nations is interested in developing the strongest legislation possible in order to close hunting of grizzly bears in the GBR permanently. We are also interested in including the commitment to close the hunt in the GBR in the Coastal First Nations and BC Reconciliation Protocol Agreement.

3. Including relevant GBPU's and MUs in Hunting closure

To truly protect grizzly bears in the GBR, they need to be protected at a population unit scale, with consideration given to connectivity, movement and habitat. As much as possible Management Units (MUs) should not be split up, but rather closed as a unit. Better yet, we recommend closing all Grizzly Bear Population Units (GBPU's) in the GBR (in whole or in part). By the Province's own account, grizzly bears in BC are comprised of discrete or nearly discrete GBPU's and they are managed as such to ensure local conservation and management objectives are being met and to reflect known and suspected fractures in grizzly bear distribution. GBPU's have been used for setting land use priorities for grizzly bear conservation during strategic land use planning and are currently being used to direct population recovery.

GBPU's that overlap the GBR area in whole or in part include: Stewart, Khutzeymateen, North Coast, Bulkley-Lakes, Kitlope-Fiordland, Tweedsmuir, Kwatna-Owikenno, Klinaklini-Homathko, Kingcome-Wakeman, Knight-Bute.

We are concerned about the status of bears that move even slightly out of their designated areas. Grizzlies depend on the ability to move freely over vast landscapes. We know from many studies, including our own bear research, that coastal grizzly bears travel great distances up and down the coast and back and forth from the



interior to the coast. As proposed, the closure will protect some bear populations in only part of their population unit.

Of particular concern are the grizzly bears in areas 5-6 and 5-5 (located in the Klinakliini-Homathco GBPU), which are a unique population of bears in the GBR. From our bear research projects throughout the GBR, we have not detected grizzly bears from the Bella Coola River Valley (e.g. upriver of the estuary or the tributaries such as Atnarko) elsewhere in the GBR, suggesting that the bears in this area are moving down from the Chilcotin Plateau or area 5-6, 5-5. Put another way, these areas contain key rearing/habitat for grizzly bears on the coast and should be protected from hunting under this proposed closure. The Bella Coola Valley is currently one of the most hunted areas in the Great Bear Rainforest due in large part to easy road access.

The Policy Discussion Intent Paper identifies 13 MUs that have current Limited Entry Hunting (LEH) designation and that overlap the GBR area. 5 of these MUs are identified as lying partially within the GBR. The grizzly bear populations in these 5 LEH areas would be arbitrarily divided based the percentage of land within and outside the GBR. For instance, there are 104 grizzlies in MU/Zone 5-06, which is 40% within the GBR. Of those grizzlies, it is estimated that 40% (42 grizzlies) are within the GBR. However, the actual distribution of grizzlies in 5-06 at any given time may be quite different than the arbitrary percentages indicated due to geographical realities of the entire zone, and how grizzly bears move around.

We recommend that 100% percent of the MUs captured by the GBR boundary be closed to hunting and the MUs that have been arbitrarily split by the GBR boundary be included in the hunting closure in their entirety. As noted the GBPU's should also not be split up by the GBR boundary as much as possible. This approach would create a management buffer and further protect several hundred previously unprotected grizzlies and the GBR bear populations as a whole. The table in Appendix 1 indicates the GBPU's and MUs in the GBR, and the recommended hunting closures.

Some GBPU's and/or MUs within the GBR are also currently closed to hunting due to their designation as a Grizzly Bear Management Area (GBMA). These GBMA's are not identified in the intent paper maps but we are interested in confirming that the hunting closure will continue in these areas and MUs as well.



4. Packing out of grizzly bear meat and confiscating trophy parts

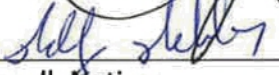
We want to confirm that CFN do not support a “pack it out policy” and support a complete closure of grizzly bear hunting in the GBR.

5. Black Bears

We want to confirm that the hunting of black bears should also be closed in the GBR. Many black bears in GBR carry the recessive gene that produces the white phase of the black bear known as Spirit bears.

Thank you for the opportunity to participate in this discussion.

Respectfully,

 _____ Kitasoo/Xais'Xais First Nation	 _____ Heiltsuk First Nation
 _____ Nuxalk Nation	 _____ Giga'at First Nation
 _____ Wuikinuxv Nation	 _____ Metlakatla First Nation
 _____ Council of the Haida Nation	

CC: Honourable Doug Donaldson, Minister of Forests, Lands, Natural Resource Operations and Rural Development
Honourable Scott Fraser, Minister of Indigenous Relations and Reconciliation
Honourable George Heyman, Minister of Environment and Climate Change Strategy



**COASTAL
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GREAT BEAR INITIATIVE

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Wulkinuxw Nation

Council of the Haida Nation

Heiltsuk First Nation



Giga'at First Nation



Metlakatla First Nation

CC: Honourable Doug Donaldson, Minister of Forests, Lands, Natural Resource
Operations and Rural Development
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Strategy



**COASTAL
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GREAT BEAR INITIATIVE

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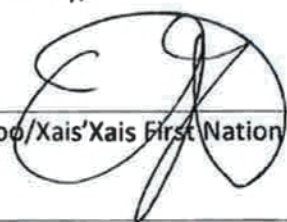
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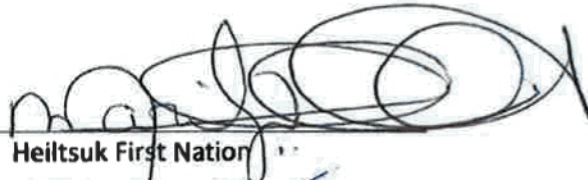


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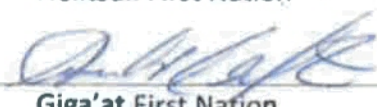
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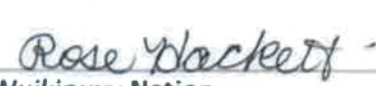
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