

In Attendance:

Meghann Cant, WRNBC Vice President
Kate Craig, Senior Wildlife Policy Analyst, HQ
Myke Chutter, Provincial Bird Specialist, HQ
Gerad Hales, Wildlife Policy Unit Head, HQ
Angelika Langen, WRNBC President
Cait Nelson, Wildlife Technician, HQ
Helen Schwantje, Provincial Wildlife Veterinarian, HQ
Dominique Sigg, Wildlife Conservation Specialist, MOE
Mike Badry, Wildlife Conflicts Prevention Coordinator, COS

Absent:

Billy Wilton, Wildlife Biologist, West Coast
Sean Pendergast, West Coast
Brent Gurd, Wildlife Biologist, South Coast

Agenda:

Review of Action Items from Previous meeting

1. Schedule C Decision Note

The Decision Note was sent to executive before BC election, but it was requested that we resend post-election. Kate and Gerad will review and re-send in the next week or two.

The good news is that FLNRO retained the same Minister and Assistant Deputy Minister; therefore executive is already informed on the issue.

2. Permit Renewal Update

No new business to discuss

3. WILD-One Reporting

WRNBC will identify 5 or so rehabilitators to test the inline reporting tool. Preliminary trials (by rehab community) have found the tool to be “user friendly”.

Currently most reports are from the USA, however WILD-One is agreeable to increasing the Canadian input.

4. WRNBC Annual General Meeting

There was good attendance at the March 2013 AGM. Brent Gurd (FLNRO) presented and there was a good exchange of information. Everyone appreciated the government presence and interest to work collaboratively.

5. Other Business

Helen: Grey Squirrel Euthanasia

A member of the public contacted Helen, wanting to develop a protocol for trapping and euthanizing grey squirrels. Currently he uses CO from car exhaust to euthanize, but received a "cease and desist" from the SPCA.

Squirrel kill-traps are not practical with current regulations (>200m from a dwelling)

The information is inconsistent or not practical for nuisance trappers. Helen has contacted Sara Dubois (SPCA) and asked about the SPCA "messaging" in this matter.

What do rehabbers do?

Meghann (while at critter care) used euthasol/barbiturates.

Angelika was told to use a CO2 tank.

There is a new euthanasia document for reference.

AVMA Guidelines for Euthanasia of Animals, 2013 Edition.

Action Item: Helen to forward to Angelika and Mike Badry

Ministry of Forests, Lands and Natural Resource Operations
Schedule C Decision Note Summary

Prepared for the Wildlife Rehabilitators Network of B.C.
November 14, 2012

A decision note will be sent forward to Tom Ethier, Assistant Deputy Minister of Forests, Lands and Natural Resource Operations by November 30, 2012 as was discussed and agreed upon by FLNRO staff and WRNBC representatives. This decision note will consider many of the issues that the WRNBC have brought forward regarding wildlife rehabilitation along with considerations as they affect the Government of B.C.

Please note that this decision note is focussed on making a decision in regards to the release of Wildlife Act Designation and Exemption Schedule C wildlife. There are other issues that have been put forward that will continue to be worked on through the working group meetings with FLNRO and the WRNBC. FLNRO staff are committed to working closely with the WRNBC to resolve issues and concerns brought forward.

The structure of a decision note consists of a full spectrum of options that are then broken down into pros, cons and other considerations with a description of how they may affect the provincial government, stakeholders, wildlife management and any other subjects related to the material being considered.

These options are presented to the decision maker and they may choose one of the options presented or not. On occasion further information or considerations are requested that may delay a final decision on the matter. The final decision lies with the decision maker and there is no set timeline for when a decision is made.

Please find below a summary of the issues put forward in this decision note.

BACKGROUND

There are currently 20 permitted wildlife rehabilitation facilities in British Columbia who rehabilitate and release injured and orphaned wildlife. Each permit has a condition that prohibits the release of species listed on Schedule C of the Designation and Exemption Regulation. This list consists of nuisance and invasive species and includes both native and alien species. Many of these species are known to be harmful to native wildlife and ecosystems. Some rehabilitation facilities have a condition that restricts the release of all Schedule C wildlife, while others have a condition that restricts the release of only alien Schedule C wildlife.

There is one exception to this permit condition. The BCSPCA's Wild ARC Rehabilitation Centre near Victoria has a policy to not euthanize healthy wildlife, and have been permitted to release sterilized Eastern Grey Squirrels into established habitats in the Capitol Regional District.

Originally, sterilizing squirrels was a compromise to public demands to humanely care for these animals, and prevent the spread of these species, while upholding Wild ARC's internal policy of not euthanizing any healthy wildlife. This special consideration was intended as a temporary measure until a more comprehensive plan to manage this issue was created. There is currently no evidence that chemical sterilization works specifically on Eastern Grey Squirrels. The Ministry is concerned that this approach has created mixed messages for the public regarding the Ministry's stance on invasive alien species, while potentially contributing to the spread of the Eastern Grey Squirrel on Vancouver Island.

For the last 10 years, approximately half of B.C. rehabilitation facilities have knowingly or inadvertently violated this condition on their permit by rehabilitating and releasing Schedule C species. Most recently, approximately 2811 Schedule C wildlife were reportedly released in one year by rehabilitation facilities. This made up 39% of all reported wildlife released in B.C. from rehabilitation facilities, most of which were in the Lower Mainland and on Vancouver Island. There has been little enforcement of these infractions from regional ministry offices or from the Conservation Officer Service in previous years. This past year, a number of advisory letters were sent out to facilities that were in violation of their permits which prompted the Wildlife Rehabilitators Network of BC (WRNBC) to issue a position statement to the Ministry.

DISCUSSION

There have been permit conditions restricting the rehabilitation and release of Schedule C wildlife for a number of years. The Government of British Columbia is the regulating body responsible for wildlife in British Columbia. As such, it is the Ministry's duty to protect and conserve British Columbia's natural resources for the use and enjoyment of all British Columbians.

The Government of British Columbia has committed to a number of agreements in regards to the control of invasive alien species.

Canada was the first industrialized country to ratify the *United Nations Convention on Biological Diversity* developed at the RIO Earth Summit in 1992. Under Article 8(h), all signatories are required to "prevent the introduction of, control or eradicate those alien species which threaten ecosystems, habitats or species". Under this strategy provincial governments have agreed to the responsibilities of managing invasive species, which includes the eradication, containment and control of those species. Specific to provincial permitting of wildlife, the strategy states:

Provincial and territorial governments play a significant role in authorizing /prohibiting intentional introductions of alien species on crown and private lands, a substantial portion of the national land base. Provincial, territorial and federal departments in the agriculture, forestry, wildlife, fisheries, and parks sectors must continue to work closely on invasive alien species issues.

The Government of British Columbia developed the *Invasive Alien Species Framework for BC: Identifying and Addressing Threats to Biodiversity* in 2004 which states the following as its primary goal:

To minimize and address threats of invasive alien species to British Columbia's environment, economy and human health, thus maintaining and restoring the natural diversity of BC's ecosystems, fish and wildlife species and their habitats.

Since 2004, the B.C. Inter-Ministry Invasive Species Working Group has coordinated invasive species management in the Province. This group consists of representatives from MOE, MOT, FLNRO and others. In previous years the group has focussed on invasive alien plant issues but has recently begun working on issues related to invasive alien animals. The group has offered to participate in working on this issue and the group does not support the rehabilitation and release of any invasive alien species.

Many of the species found on Schedule C are known to either cause damage to human infrastructure (buildings, land, crops, etc.) or damage to ecosystems and native species. Recent issues have included the spread of Eastern Grey Squirrel into the Okanagan, Starling control for agricultural and winery crops and ongoing European Rabbit control issues in urban areas. There is a large body of scientific knowledge describing the negative impacts of invasive alien species on native species and ecosystems globally.

A jurisdictional review found that many provinces and states either have legislation in place to restrict the rehabilitation and release of invasive alien species or the government is currently working on developing such legislation in recognition of these issues.

Ministry staff are concerned about the ecological consequences of expanding populations of Schedule C species in the province, and the role that rehabilitating those species may be playing in this trend. There is also concern that the approach now being used is creating inconsistent public messages regarding the best management practices for invasive alien species, while subjecting rehabilitation facilities to inconsistent administration by the Ministry.

Nonetheless, staff recognize that for some rehabilitators, invasive alien species comprise a considerable part of their work which helps to generate donations for their facilities. The Ministry is also aware that for some of the public, taking an injured animal to a rehabilitator gives them a valuable connection to wildlife, regardless of whether that species is native or invasive. Thus, staff recognize that if the Ministry prohibits all rehabilitation and release of invasive alien species, there must be efforts made to provide appropriate education materials that rehabilitators can easily distribute to the public, clearly explaining the risks to our native wildlife and habitat from these species.

Due to inconsistent messaging and decision making from the Ministry, the WRNBC is requesting that the condition to not release Schedule C wildlife be reconsidered and removed from permits and that a consistent, province-wide decision be made on this issue. If the Ministry requires more time to consider the issue, the WRNBC would like the permit condition removed during the interim. They are also requesting that if species are to be restricted, that the provincial government provides educational materials and messaging for the public as to why rehabilitation facilities can no longer take these animals, as well as a call-in number and provincial facilities for people to bring injured or orphaned Schedule C species that can no longer be taken in by rehabilitation facilities.

WRNBC members do not wish to continue to be in non-compliance of their permits yet they are concerned that if they are no longer allowed to rehabilitate Schedule C wildlife that this will greatly impact their funding and support from the public. Wildlife rehabilitation centres are privately funded in B.C. and rely solely on donations.

OPTIONS (in no particular order)

Status quo

Continue to issue rehabilitation permits with the current conditions related to not releasing Schedule C wildlife.

Pros

- There are negligible benefits to this option.

Cons

- Inconsistencies and confusion with permits, permit conditions and enforcement would continue.
- Regional staff will have to make decision to continue issuing permits to non-compliant facilities or take action against them.
- The WRNBC will likely escalate their actions regarding their concerns through media and public supporters.
- This option is not consistent with government policies concerning the control of invasive alien species and protection of native species and ecosystems.
- Would enable those in non-compliance to continue their activities with little or no repercussions.
- Would not resolve the issue for either rehabilitation facilities or Ministry staff.
- Would not have any direct economic cost to government, though would likely have repercussions to the health of native wildlife and increased wildlife/human conflicts which may result in future costs.

Remove condition from all permits

Remove the condition to restrict the release of all Schedule C wildlife. Release of wildlife would still be required to occur near the location where it was initially found.

Pros

- Would be supported by some members of the rehabilitation community.
- Negligible benefit to the Government of B.C.
- Would not have any direct economic cost to government, though would likely have repercussions to the health of native wildlife and increased wildlife/human conflicts which may result in future costs.

Cons

- Is not consistent with government messaging concerning the control of invasive alien species.
- Would not be consistent with or support existing provincial, national and international policies/strategies to control spread of alien species.
- Does not take into consideration concerns of other stakeholders (municipal governments, veterinarians, agricultural sector, species/habitat preservationists, etc).
- May increase the number of invasive alien species being released and could provide threats to native wildlife through continued expansion and survival of invasive alien species and may enable new invasive alien species to establish and spread.
- Would not educate the public regarding the alien species issue.

Enforce current conditions on permits

Similar to the option of maintaining the status quo, with the addition of immediate enforcement against facilities in non-compliance of their permits. This would entail a consistent province-wide approach to enforcement.

Pros

- Would provide a strong message about enforcement of existing permit conditions.
- May stop rehabbers from violating their permit conditions in the future.

Cons

- Action against facilities would be inconsistent as permit conditions are inconsistent.
- The WRNBC will likely escalate their actions regarding their concerns through media and public supporters.
- Would not educate the public, likely resulting in increased public complaints.
- May result in public bringing injured Schedule C alien wildlife to government staff, or trying to rehabilitate and release wildlife themselves.
- Would not have immediate costs associated with creating a pamphlet or sterilising/euthanizing wildlife. Would prevent potential future costs associated with repercussions to the health of native wildlife and increased wildlife/human conflicts.

Initiate a transitional plan to restrict the rehabilitation of invasive alien species on Schedule C

Staff will develop a transitional implementation plan to restrict the rehabilitation and release of invasive alien species listed on Schedule C. Ministry staff recognize that it is necessary to address some of the concerns raised by the WRNBC including public education, developing an euthanasia plan and permit consistency. The plan will include the development of invasive alien species educational materials for the FLNRO website and for rehabilitation facilities to distribute to members of the public. Staff will develop a euthanasia plan that will manage invasive alien species that rehabilitation facilities cannot handle. Permits will be reviewed for existing conditions and consultation will take place with regional managers, who are the decision makers, to discuss implementing consistent permit conditions during and after the transition period.

Pros

- Consistent with government mandate, policies and programs.
- Consistent with provincial, national and international invasive alien species agreements.
- Does not apply to native species.
- Creates a dedicated timeline with clear goals and requirements.
- Allows time for rehabilitation facilities to implement the change and provide messaging and education to funders and public supporters.
- Provides time for staff to develop educational materials on the control of invasive alien species to support this decision.

Cons

- May create discontent among some members of the public and the rehabilitation community.
- May result in public bringing injured Schedule C alien wildlife to government staff, or trying to rehabilitate and release wildlife themselves. This will be addressed in the education material.
- Will require staff time (FWHM, COS and MOE) and cost to develop and implement plan and educational materials, as well as to monitor facilities for compliance and to develop and administer a euthanasia plan and/or program.

Initiate a transitional plan to restrict invasive alien species on Schedule C *unless* those species are surgically neutered

Similar to the recommended option with the exception of allowing the release of neutered invasive alien species into established areas.

Pros

- Would provide a more middle ground option for the WRNBC.

Cons

- Staff have concerns about the ability to properly monitor and enforce this condition.
- Releasing neutered animals controls the reproduction of those released animals but does not remove the impact that those individuals may have on ecosystems and other species.
- Surgical neutering may be cost prohibitive for many facilities.
- This option is not consistent with government policies concerning the control of invasive alien species and protection of native species and ecosystems.