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BC SPCA Submission on Grizzly Bear Trophy Hunt & Grizzly Bear Hunt in Great Bear Rainforest

Prepared by Dr. Sara Dubois, BC SPCA Chief Scientific Officer

Dr. Dubois (BSc, UVic; MSc & PhD, UBC) is a Registered Professional Biologist and an Adjunct Professor in Applied Biology at UBC. Over the past 20 years, her expertise has focused on human dimensions of wildlife, wildlife control, wildlife rehabilitation and compassionate conservation. She has previously conducted grizzly bear research with Parks Canada, and worked a summer with the Ministry on the LEH and other hunting management activities. Dr. Dubois has taken the CORE Program and holds salvage and rehabilitation permits on behalf of the BC SPCA Wild ARC. She spent 10 days in the Great Bear Rainforest in September 2017 speaking with tour operators and First Nations about their concerns related to hunting activities in the area.

The BC SPCA is the largest animal welfare organization of its kind in North America, with more than 550 staff and 5000 volunteers across 44 locations in the province. As an evidence-based animal welfare charity, we engage with our 80,000+ supporters on our mission work to protect and enhance the welfare of companion, farm and wild animals. The BC SPCA is the only animal welfare organization in the province with the authority to investigate animal cruelty laws, including cruelty acts to wildlife.

Summary Statement

The BC SPCA supports a total ban on grizzly bear hunting in the Great Bear Rainforest (GBR) to respect Indigenous laws of the Coastal First Nations, to preserve the cultural and ecological importance of this unique ecosystem as well as the inherent value of the bears, and to promote world-class ecotourism. The full ban should include all areas of Management Units (MUs) located in the GBR, even if only partially within the GBR, for both administrative and enforcement purposes.

The BC SPCA supports a total ban on grizzly bear hunting province-wide, given the uncertainty in population estimates and increasingly unpredictable environmental pressures on a threatened keystone species. However, in the absence of a total ban at this time, a regulated meat hunt will require diligent monitoring and transparent data sharing to ensure the hunt is managed to reduce illegitimate hunting using the meat hunt as a guise for a trophy hunt. Further, no meat hunt should be authorized in provincial parks and all areas where Indigenous laws ban grizzly bear hunting to honour reconciliation.

Finally, the BC SPCA recommends the government wait for the release of the Auditor General's report this fall before any final policy recommendations or cabinet vote. Independent oversight of the consultation process is required to ensure that the review of all submissions from internal and external stakeholders and the public is objective and free from conflict of interest. Ministry staff experts who have previously supported a sustainable grizzly bear hunt have not demonstrated neutrality to this consultation process.

BC SPCA Position on the Grizzly Bear Trophy Hunt

The BC SPCA is opposed to hunting any animal for trophy purposes, but supports ethical hunting when the principles of fair chase, population sustainability, humane killing and “eat what you kill” are applied. Further, the BC SPCA is opposed to hunting keystone species and any animal at risk or threatened, as their role and value in the ecosystem extends beyond the animal itself. The grizzly bear is a blue-listed species¹ in BC and federal critiques of provincial management reiterate concerns for high undocumented mortality of this vulnerable species with low recruitment rates. See: [BC SPCA Position Statement on Hunting](#)

Great Bear Rainforest (GBR)

The BC SPCA supports a total ban on grizzly bear hunting in the GBR in all 13 MUs to respect Indigenous laws of the Coastal First Nations. Further, research conducted by Coastal First Nations² and environmental non-governmental organizations (ENGOs) in the GBR continues to advance knowledge of populations and individual animals, serving as a holistic model for Ministry objectives. Any hunting of grizzly bears in this unique ecosystem is detrimental to the existing research goals and ecosystem-based management³.

The grizzly bear hunt would have a negative impact on world-class commercial bear viewing in the GBR, due to the removal of bears and the potential for reputational damage to the “Beautiful BC” brand. Reduction in bear viewing opportunities will also cause economic harm to viewing operations, some of which are operated by local First Nations. In addition to the bears’ inherent value, bears are also architects of entire communities of animals and plants. Their role as nutrient transporters is critical for plant biodiversity⁴ and thus their removal through hunting will have cascading effects and result in significant changes to local ecosystems.

The full ban should include all areas of MUs located in the GBR, even if only partially within the GBR, for both administrative and enforcement purposes. The policy implications include a ban in the eight MUs fully contained within the GBR (1-14A, 1-14B, 1-15B, 1-15C, 5-08A, 5-08B, 5-08C, 5-09A) and a ban in the five MUs partially within the GBR (5-6, 6-03B, 6-10, 6-11, 6-16B). Reviewing past kill data provided, in a 5-year period only nine animals were hunted in these latter MUs, mostly by non-residents through guided hunts; therefore closing these low activity areas would have very limited impact on residents of BC. Practically speaking, bears are moving within these sections of the MU and do not know when they are inside GBR or outside. Given the limited number of Conservation Officers in the area, it would be difficult to enforce both a ban and permitted hunting within an MU that has mixed authorizations.

Meat Hunt

The BC SPCA supports the rights of First Nations to hunt grizzly bears pursuant to aboriginal rights for food, social, or ceremonial purposes, treaty rights, and other traditional use, and where independent science confirms local populations can sustain removal of these animals. Additionally, to respect Indigenous laws in areas where First Nations have totally banned the grizzly hunt, the BC SPCA believes there should be no regulated meat hunt within these MUs. Further, no regulated meat hunt should be allowed within provincial parks⁵, which are intended to be, and there is a public expectation of, a safe haven for wildlife within preserved habitat. Finally, the Ministry should fulfill its own commitments to establishing “*Grizzly Bear No Hunting Areas*” (GBNHAs) across the nine ecoprovinces⁶ previously promised and implement GBNHAs before considering a regulated meat hunt outside the GBR.

Although the BC SPCA does not support a meat hunt, we understand this is the current policy direction of the Ministry. In consideration of these new regulations, we are aware that the technical aspects of managing bear parts will be informed by internal stakeholders and the BC SPCA supports the recommendations of the David Suzuki Foundation, Raincoast Conservation Foundation and the Commercial Bear Viewing Association of BC. We will note however, that no animal welfare science or wildlife cruelty enforcement representative was invited to participate as an internal stakeholder, and therefore expert animal protection input is missing.

Current Science and Policy Issues - Uncertainty in Population Estimates

A fundamental tenant in wildlife biology is the *Precautionary Principle*; in this case, the burden of proof that hunting grizzly bears is not harmful to their populations falls upon those regulating and conducting the hunt. Yet, this principle is not being met despite knowing the irreversible harms caused by removing large predators from the ecosystem, and knowing that sufficient scientific knowledge about populations is lacking and existing data is disputed. While Ministry population estimates based on modelling claim the hunt to be sustainable⁷, other experts have shown that significant overmortality (e.g., poaching, road and rail kill, agricultural conflict, overhunting of females) is being overlooked⁸.

In an external review of the grizzly bear harvest management system prepared for the Ministry⁹, authors state the *“the future of grizzly bears in the coming decades will be challenged as the human population in the Province increases.”* Key recommendations include extensive improvements to the current management system, which they describe as too under-resourced to conduct population inventory, monitoring, data handling, and analysis. A critique of this same report¹⁰ prepared for the Auditor General disagrees with the authors overall conclusion that the hunt remains sustainable and describes this conclusion as conjecture, that would not meet the standards of peer-review.

The recent legal killing of a female bear collared for research¹¹ is only one example where even the best-intentioned regulations – asking hunters to avoid females and research subjects (collared animals) – is outside the control of wildlife managers. Further, although few First Nations hunt grizzly bear, no reporting or licensing is required for them, adding another uncertainty to Ministry’s allowable harvest numbers.

Perhaps the greatest uncertainty remains outside of the research scope for Ministry wildlife staff, as the effect of climate change on grizzly bear populations is not being considered in population estimates. Following the devastating wildfires this summer in grizzly bear habitat, these affected MUs should be closed for meat hunting until further study. The Ministry has already made changes to hunting access for motor vehicles¹² this fall as a result of vegetation loss from fires that will impact deer and moose populations. Experts suggest this summer’s worst fire season on record will be repeated in coming years and this must be accounted for. Climate change will also have a dramatic impact on food availability throughout the province as salmon run returns decline. This has already pushed grizzly bears to become established on new island habitats on the coast, and this further alters areas in need of bear protection.

The BC Wildlife Federation’s suggestion that hard-to-access, primary source data will be unavailable if trophy hunting is banned is misleading. A transparently regulated meat hunt should require submission of all trophy items and parts of scientific interest to the Ministry. Further, in the event of a total ban, First Nations who continue to hunt for traditional use can participate in scientific collection. DNA hair snaring is conducted by ENGOs and First Nations now and data sharing agreements could be negotiated, plus funding for more research.

The Selfie is the new Trophy

Internationally concerns for individual animals have been raised by experts in relation to the new “selfie” phenomenon. Social media and other distribution of digital media has encouraged hunters to participate in a new digital form of trophy hunting. In these scenarios, the photo of the hunter posed with the animal they have killed becomes the trophy itself, as a means of status seeking¹³ and displaying achievement¹⁴. Therefore, the Ministry should be aware that even regulating a meat hunt that restricts possession of non-edible parts, still enables hunters with non-meat motivations to pose with grizzly bears they killed and obtain a “digital trophy”.

Auditor General’s Report

In June 2016, the Auditor General¹⁵ (AG) announced a performance audit to determine if the Ministry of Environment and the Ministry of Forests, Lands and Natural Resource Operations are effectively managing the grizzly bear population:

“This audit will determine whether government is meeting its objective of ensuring healthy grizzly bear populations throughout B.C. The audit will focus on the Ministry of Environment and the Ministry of Forests, Lands and Natural Resource Operations and their roles in meeting government’s objective. It will also look at government’s planning and activities in this area, as well as its reporting to the public and legislators as to the effectiveness of grizzly bear management.”

It is imperative that the AG’s report be released and fully considered before any new regulations are finalized or cabinet vote taken. This independent process may reveal there is insufficient scientific evidence to ensure viable grizzly bear populations, or a lack of a social license, for any further bear hunting. Any policies rolled out in advance risk being contrary to the AG’s findings and could derail the goodwill of the government to fulfill its commitment to ending the grizzly bear trophy hunt and a complete ban in the GBR.

Public Consultation

The BC SPCA applauds the Ministry’s announcement on Oct 3rd to solicit public feedback until Nov 2nd on the policy documents. In the past, public consultation on such controversial issues has been lacking and we appreciate the workload this presents. Transparency in decision-making is vital to public policy.

Conflict of Interest

It is important to recognize that the Fish and Wildlife branch experts that have previously written and published reports supporting a sustainable grizzly bear hunt are not neutral to this consultation process. There is a clear conflict of interest if these same staff compile public feedback and process internal and external consultation results, as only selective information may find its way into the corresponding policy recommendations. There is a need for an independent oversight panel to oversee policy development.

The BC SPCA has first-hand experience with improper and non-transparent decisions made by Ministry experts relating to wildlife management. In a 2016 ruling, the Environmental Appeal Board (EAB) strongly critiqued a Ministry decision-making process as *“arbitrary, unfair, unsupported by science, and ignored important considerations”* in an appeal case launched by the BC SPCA¹⁶. The EAB encouraged the BC SPCA to seek costs given the egregious behaviour of Ministry staff, and costs were awarded.

Thank you for the opportunity to participate in the external stakeholder process of grizzly bear hunt consultation process. If you have any additional questions about this submission, please contact me directly at sdubois@spca.bc.ca or 604-647-6403.

With sincere regards,
Sara Dubois, PhD, RPBio



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