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Province of British Columbia
Ministry of Environment & Climate Change Strategy
Ministry of Forests, Lands, Natural Resource Operations and Rural Development

RE: Wildlife & Habitat Engagement Submission

The British Columbia Society for the Prevention of Cruelty to Animals (BC SPCA) is North America's largest animal welfare organization of its kind, operating province-wide to enhance and protect the quality of life of companion, farm and wild animals. In addition to its role as the designated agency for animal cruelty enforcement and operating facilities in 44 locations, the BC SPCA regularly contributes to evidence-based policy development at national, provincial and municipal levels. The BC SPCA's Wild ARC near Victoria, is the province's second largest wildlife rehabilitation centre, caring for over 3,000 injured and orphaned wild animals each year under provincial and federal permits. Further, the BC SPCA's provincial hotline fields thousands of calls annually from across the province related to wildlife issues.

As a charity for social change, the over 100,000 supporters of the BC SPCA are regularly engaged in advocacy and have a demonstrated concern for wildlife welfare and the sustainability of their environment in the face of climate change, human population growth and industrial activities. The BC SPCA has a long-standing relationship with both Ministries and supports the broad consultative approach to public policy development through the current engagement process, but emphasizes the urgent need for interim wildlife and habitat protections and regulatory changes before 2020 when this process will conclude.

In 2007, the BC SPCA's submission to Wildlife Act amendments became the basis for a collaboration with government, which brought about legislative and policy changes for Controlled Alien Species in BC. The BC SPCA continues to participate as the only non-governmental representative on certain Ministry committees, including the Controlled Alien Species Permit Adjudication Committee and Provincial Urban Deer Advisory Committee. Further, the BC SPCA has frequently engaged with the Province on land-based oil spill response planning, having previously been the designated agency for oiled wildlife response in the 1990s. For the past two decades throughout these interactions, it is obvious that as cross-Ministry responsibilities have expanded and increased, staffing and department resources have not kept pace, but instead dramatically declined.

Funding is the core issue to address and will determine the success of any proposed initiatives for wildlife and habitat management going forward. This engagement is an opportunity to redefine wildlife management to ensure intergenerational benefits to all British Columbians, not just special interests, and recognize the inherent value of wildlife. Conservation is a non-partisan issue and funding should not be tied to political cycles, but rather seen as an essential investment in the health and economy of British Columbia.

The BC SPCA supports the Province's commitment to implement the United Nations Declaration on the Rights of Indigenous Peoples and engage meaningfully with First Nations on government-to-government agreements that are science-based and informed by traditional knowledge. Broad engagement for Species at Risk, Caribou Recovery and Wildlife & Habitat are very welcomed, but juggling identified priorities for each of these areas within a timely manner will be challenging given resource constraints. For example, the BC SPCA and many other NGOs recommended a moratorium on industrial and recreational activities within all critical caribou ranges to prevent further losses during recovery planning, providing the government more time to effectively create plans and engage stakeholders. Further, a temporary moratorium on old-growth logging would address NGO concerns for caribou and other species at risk during the consultation processes, which will take years to conclude. Bold leadership to suspend such activities is needed in such a critical conservation moment in time.

In regards to the Wildlife & Habitat Engagement, the BC SPCA views this as an opportunity to amend the Wildlife Act, Designation & Exemption Regulations and Controlled Alien Species Regulations. Therefore some of the below points are specific to such recommended changes although included under general engagement questions.

Challenge 1: Advancing Reconciliation with Indigenous peoples

What programs and policies are most important to advance meaningful and lasting reconciliation with Indigenous peoples and help implement UNDRIP?

True reconciliation would ensure Indigenous people act as decision-makers and are not just consulted. When looking at effective co-management or agreement models for natural resources, the Haida Nation and Coastal First Nations are excellent examples. Targeted hiring of Indigenous people in the Fish & Wildlife and Policy Branches should be considered.

Traditional Knowledge should play an important role alongside science in environmental decision-making. Respect indigenous laws of wildlife protection and empower Indigenous-led research.

Wildlife have a right to exist regardless of any utility to any people. Good conservation science and wildlife management is in the interest of all and one key to this is information. Therefore, while respecting treaty rights and title, harvest data for subsistence, ceremonial and social purposes should be collected and used to help empower decision-making that benefits wildlife and stakeholders.

Challenge 2: Increasing Involvement and Shared Stewardship

How should a broad range of stakeholders be involved in wildlife management and habitat conservation decisions?

What are your suggestions for a new governance model for wildlife management and habitat conservation?

A new governance model must work harder to ensure the views of the BC public (currently under-represented) are reflected in wildlife management and habitat conservation. These views can be found in the results of public polling and research from BC conservation centres and academic research institutions others. This would widen the information flowing to the government and provide wider context to the more narrow scope of information championed by traditional stakeholder user groups. One way to engage and educate so-called "urbanites" who traditional stakeholders believe are "too emotional" is to work through non-traditional wildlife stakeholders,

non-consumptive NGOs. Without broader approaches, the perceived “divide” between urban and rural values will continue to be perpetuated, when studies have shown both groups care about the conservation of wildlife and habitat for future generations.

There is a need to clarify that conservation and wildlife management are different science and policy frameworks – conservation aims to objectively enhance and protect biodiversity, while wildlife management studies populations based on subjective goals for allocation determined by government policy. Wildlife management can contribute to conservation goals but resource use decisions have traditionally been made to benefit special interests. Based on the past 20 years of wildlife population declines and habitat loss, the system needs a fundamental shift to engage new stakeholders.

There will always be various opinions about wildlife management from different stakeholder groups but leaving out all non-consumptive users is a public policy failure. Prior to this consultation, only pay-to-play users (guide outfitters, hunters, trappers, and industry) have been included in wildlife management policy development as traditional stakeholders. For example, in 2012, the BC SPCA requested to participate on the Provincial Hunting and Trapping Advisory Team and was told our participation would make other groups uncomfortable. PTHAT and regional wildlife management committees should also include members from diverse naturalist, tourism, advocacy and wildlife groups.

Traditional stakeholders state they support “science-based” approaches to wildlife management, but only recognize certain “science” principles. Social science is science. Science-based decision-making does not mean ethics have no place in policy, and in fact Conservation Ethics and Conservation Decision Science are entire fields of research and academic enquiry. One cross-Ministry recommendation would be for conservation ethics to be included in B.C. secondary school curriculum, similar to social justice and environmental requirements. Further, Human Dimensions of Wildlife is a well-established field and the government had previously committed to diverse and consistent stakeholder engagement through human dimensions research, creating a full-time position in this area. However, these goals were never fully realized and as such, many management plans lack transparency, external review and support from organizations who share certain conservation goals with government.

The BC SPCA is not opposed to [ethical hunting](#) and has staff, volunteers and supporters who hunt. We have supporters who represent a large spectrum of concerned citizens from pet guardians, animal business owners, students and academics, to farmers and vegans – reflecting broader society. Traditional wildlife stakeholders may feel that we have no common interests for the protection and enhancement of wildlife and habitat – yet we all agree that habitat loss and degradation is key issue.

Hunters who oppose the grizzly bear hunt ban are upset in submission comments because they believed the hunt to be sustainable and feel that the ban was not based on government science. Without accurate inventories of such sensitive wild species, banning the grizzly bear hunt was not only a good conservation decision, but reflected broad social values against an indiscriminate trophy hunt.

Government biologists are not the only qualified biologists in the province and there is a need to engage deeper with professional associations, academia and NGOs. There has been a reliance on internal experts with inherent biases to work with traditional stakeholders and outsourcing to industry through a professional reliance model, which itself is undergoing an overhaul to address deficiencies. A lack of funding for government research and expertise is obvious as many key positions have not been replaced when individuals retire, and there is limited travel, continuing education and conference budgets and publication access. New and innovative approaches to wildlife management internationally are being missed, while BC is stuck in the world of “Journal of Wildlife

Management". Since 2017, there have been four new wildlife and conservation labs established (UBC Wildlife Co-existence Lab, UBC Conservation Decisions Lab, UBC Okanagan Wildlife Restoration Ecology Lab, and UVic Applied Conservation Macro Ecology Lab), and there are tremendous opportunities to work on BC-based conservation and wildlife management dilemmas.

The [North American Model of Conservation is outdated](#); in the last century it may have been used to try to curtail overhunting and private ownership and sales of wildlife, but it is now failing to meet serious conservation and ethical challenges. Governance based solely on this model will fail to adapt to pressures of declining wildlife populations, increased human activity, climate change, etc., and set BC back from advancing meaningful protections for wildlife and habitat.

Controlled Alien Species regulations should be expanded to include species that pose serious environmental risks (e.g. red-eared slider turtles) and others known to escape captivity (e.g. servals, kangaroos). Even prohibition of sales, breeding, importation and display (not possession) would be significant to remove new animals in BC. A public registry of CAS locations should be available to the public to refer to for compliance purposes.

With recent the Rabbit Hemorrhagic Fever outbreak in feral rabbit populations, the BC SPCA has modified its previous request to remove feral rabbits from Schedule C designation knowing this is unlikely; thus, we request that the transfer of feral rabbit possession (through adoption/rescue) be allowed without permits. This will enable animal control agencies, rescues and the BC SPCA to take in rabbits as capacity allows and make welfare-based adoption decisions similar to feral cats.

Challenge 3: Declining Wildlife Populations

What measures need to be taken to proactively manage wildlife and habitat and prevent wildlife from becoming species at risk?

Habitat loss and fragmentation should be prioritized as this one major issue can affect all wildlife species and is within government control (vs. climate change). Although different species face different risk factors, there is a critical need to address the impact industry has on wildlife and plant species, and the cumulative effects of industry, development and recreation. Recommendations from the [2017 Auditor General's report on Grizzly Bear Management](#) is an excellent example of measures needed to properly manage wildlife and habitat, not just for bears, but many species.

A significant investment in multi-partner (academic, NGO, government) research, inventory and monitoring, is needed to get people in the field to collect real-time data. Government research should be open to the same review and publishing processes as external research to ensure accountability and transparency. Government animal use activities (e.g. trapping, culling, penning, breeding) should also be subject to national ethical review, a requirement for university institutions under the Canadian Council on Animal Care.

To a lesser extent, other mortality factors, such as hunting and road/rail collisions contribute to population declines and careful monitoring of these activities is necessary. The precautionary principle should be applied in cases of uncertainty to limit these activities' impacts on sensitive wildlife species and populations. Banning the grizzly bear hunt was not only a good conservation decision, but reflected broad social values against an indiscriminate trophy hunt.

Challenge 4: Increasing Human Activity

What is the most effective way of ensuring that wildlife and habitats are healthy while fostering a healthy economy to ensure life is affordable for British Columbians?

Ecosystem based management, such as that in the Great Bear Rainforest, should drive future management plans. The province's economy is tied to its natural resources and sustainable land-use decisions that work for people and wildlife are needed for the future. Cumulative impact assessments are necessary to understand how increasing human populations affect wildlife and habitat, but mandated action beyond assessments is required.

Increase protected and wilderness areas; restrict hunting, trapping, and motorized activity in protected areas as refuges for wildlife. In some cases and seasons, restrict non-motorized recreation and increase deactivation of unused roads with true restoration (not just closure).

Review Crown land use and wildlife impacts and create incentives and education programs for private landowners to contribute to wildlife and habitat stewardship.

Challenge 5: Wildfires and Extreme Weather

What are the most effective ways to proactively adapt to the impacts of climate change to wildlife and habitats?

Work with local communities and Indigenous peoples to use prescribed burns to enhance wildlife habitat, prioritizing resilient habitat over maximum forest harvest. Invest in forest ecology research, as government positions here have decreased, so reinvest and partner with academic institutions.

No dual roles for forestry staff; have specialized fire response teams that do not require staff to take secondment from research or leadership positions, leaving significant gaps in regional and provincial staffing during many months each year given annual wildfire season lengths.

Require companies to properly manage forestry debris; ban open burning and campfires earlier in the season as precautionary measure; and close vehicle access in sensitive areas during wildfire season.

Challenge 6: Better Information

How can Traditional Ecological Knowledge, citizen science and other forms of knowledge complement science to support decision-making?

What are the best ways to share information broadly so that there is transparency and trust is gained among all parties?

FOIs should not have to be filed to obtain government research communications and data. Instead, open source, but curated data that is accessible for non-experts should be achievable with advances in technology. From inventories and mortality records, citizen scientists and NGOs are already collecting information, as are industry EIAs which should be shared freely.

Transparency of decision-making is vital. The BC SPCA won a significant environmental appeal (2015-WIL-006) pertaining to its permit conditions in part due to misinformation being used to guide government policy. From this experience, it was clear that the Ministry does not have access to all information needed, as their policy decision was not based on current or relevant science. Further, staff were not transparent in their decision-

making, with the EAB even highlighting the unfair and harsh treatment of the BC SPCA. This appeal wasted government and charitable dollars and staff resources on a fighting to defend an unwritten and uninformed policy; on principle, policy and regulations cannot be based on a lack of data available to Ministry staff.

Challenge 7: Human-Wildlife Conflicts

What are the most effective ways to reduce wildlife-human conflicts in British Columbia?

Promoting co-existence should be the pre-dominant attitude towards wildlife. "Conflict" as a term in this context needs to be modified in our language, as the term inherently biases the interaction as fault of the wildlife, in many cases justifying negative consequences to the animals (e.g. culls, cruelty). Co-existence is the more appropriate term, as although both lethal and non-lethal outcomes are possible, ethical considerations are made.

There are many models of co-existence internationally that can be used as lessons for British Columbia, and entire scientific journals and NGOs that are dedicated to this field. They range from non-lethal predator management for agriculture, to wildlife tourism guidelines and urban wildlife management. Wildlife rehabilitation centres across the province deal with the consequences of human-wildlife interactions daily without government funding. Data from these centres is not consolidated or analyzed to reduce human impacts on wildlife (e.g., roads, electrocution, illegal shooting).

Expertise and implementation of various strategies to work on co-existence will need significant resources, yet fines could offset many such costs. Partnerships with academia and NGOs such as the BC SPCA and others could increase the reach and effectiveness of government programs. Several initial strategies could be implemented immediately to achieve these goals:

- Provincial regulations prohibiting wildlife feeding should be extended beyond Dangerous Wildlife (see BC SPCA Model Animal Responsibility Bylaw, pg. 31 *Wildlife feeding and attractant management bylaw*) to include all mammals and certain bird species; fines should be increased and municipalities required or incentivized to manage attractants through wildlife-proof disposal equipment (e.g. City of Coquitlam)
- Reduce wildlife collisions by identifying and prioritizing high risk locations where wildlife-vehicle collisions are common; review and update wildlife signage; implement strategic wildlife vehicle collision countermeasures such as highway brushing and decreasing driving speeds; carry out long term monitoring of mitigation measures
- Implement well-established non-lethal predator management programs (e.g. night corrals, guarding dogs, collars, hazing, improved husbandry) in agriculture and reduce compensation program payouts which sustain poor management practices

Do not transfer wildlife management to local government control, but involve municipalities as stakeholders to be held accountable for local activities. For example, in Cranbrook, urban deer culls have been conducted for many years and yet deer numbers in the city are increasing year after year, while local hunting opportunities in surrounding areas have decreased. The Provincial Urban Deer Cost-share Program for local governments should be evaluated annually based on success indicators, whereas there is currently no incentive for funded programs to actually resolve issues.

The Conservation Officer Service requires increased resources for staffing and training in conservation science, ethics and animal welfare. The COS should be held to the standard of the Police Act with an independent oversight body and be publicly accountable for all lethal interventions.

Challenge 8: Funding

What are the best funding models, funding sources, and creative financing ideas that could increase resources for wildlife management and habitat conservation and provide additional flexibility for how funding is prioritized and allocated?

As mentioned in the preamble, funding is the core issue in this engagement as BC's financial commitment to fish and wildlife research, protection, and recovery programs is weak compared to other jurisdictions. Advocates of the NAMC, suggest that all hunting and trapping revenue be allocated to wildlife management and those stakeholders who "pay to play" should have decision-making input. If funding is tied to only tag revenue it creates an unstable dependency on these revenue sources and as seen in other jurisdictions, programs and conservation goals will be jeopardized when tag sales decline. Meaning wildlife managers have a conflict of interest, as keeping their jobs relies on hunting revenue. This also creates an inequity and would be discriminatory to vulnerable populations and Indigenous people to say if they do not pay for conservation or wildlife management, they should not have a say.

Habitat Conservation Trust Fund does great work and should continue, but creating a new designated agency outside of government to manage wildlife and designated revenue is not appropriate.

Further, in BC, tags do not cover multi-Ministry expenses and general revenues are needed for core funding. Therefore, direct revenue from wildlife-related activities can supplement existing core funding. Extending the system to allow the majority of British Columbians and visitors who do not hunt or trap to contribute to wildlife management and conservation is also required:

- Nature tax to wilderness equipment, tourism and industry – giving people the opportunity to pay for recreation opportunities or existence value of wildlife and require higher industry compensation
- Vanity license plates for wildlife species
- Increase enforcement, fine amounts and their frequency for wildlife attractants, poaching, illegal possession, pollution and dumping etc.

Thank you for inviting the BC SPCA to participate in recent engagement meetings and for reviewing this submission. The BC SPCA welcomes research and outreach partnership opportunities to improve wildlife and habitat protections.

Sincerely,



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