

Valhalla Wilderness Society

Box 329, New Denver, British Columbia, Canada V0G 1S0
Phone: (250) 358-2333, Fax: 358-2748, E-mail: vws@vws.org, www.vws.org

October 30, 2017

Honourable Doug Donaldson
Minister of Forests, Lands, Natural Resource Operations and Rural Development
Room 248 Parliament Buildings
Victoria, BC V8V 1X4
Fax: 250-387-1040
doug.donaldson.MLA@leg.bc.ca

RE: Submission re Grizzly Bear Meat Hunt

Dear Minister Donaldson,

The Valhalla Wilderness Society (VWS) supports a *total* ban on grizzly bear hunting. The reasons for VWS's position are as follows:

1. Grizzly bears (alive) are deeply valued by a majority of British Columbians. We note that 91% of British Columbians favour an end to trophy hunting of grizzly bears (Insights West poll, 2017), while 74% specifically support a total ban. In addition, according to the same poll, 58% of hunters in BC support a *total* ban on grizzly hunting in BC.
2. Grizzly bears have been wiped out over a vast area of the Continent. BC, Yukon and Alaska are their last remaining strongholds, but even in BC they are listed as threatened, have been extirpated from parts of the province, and are scarce in many areas where they are known to exist.
3. Grizzly bears are known to suffer from high mortalities caused by humans, and hunting is part of these mortalities. Assurances that further hunting will be sustainable are based on grossly inadequate data. There is little reliable information on how many grizzly bears are in various regions of the province, and how many die each year due to poaching and human conflicts.
4. The Auditor General's recent report on Grizzly Bear Management indicates that grizzly bear conservation activities are in a sorry or non-existent state under the Ministry of Forests, Lands and Natural Resource Operations.
5. Grizzly bears are not generally needed or wanted for meat. Up until the present time, BC hunting regulations classed grizzly bears as non-game animals, and allowed hunters to take only trophy parts and leave the meat to rot.
6. Grizzly bears are very large animals that often must be shot multiple times with bullets that explode inside them before they die. This has been witnessed on videos posted by hunters on the Internet, and has sickened and outraged the public.
7. Grizzly bears are rarely seen, so viewing them safely is a highly cherished experience to much of the public, including many hunters.

8. Grizzly bear hunting tags bring a paltry \$6 to \$7.6 million annually to the province's economy. Grizzly bear viewing in the Great Bear Rainforest alone brings in \$15 million annually. Bear viewing does not reduce our bears, but leaves them for others to enjoy.
9. All of the proposed new hunting regulations AND ANY POSSIBLE CHANGES to accommodate a meat hunt are completely unworkable with any efficacy. The meat hunt will make the trophy hunt ban very difficult if not impossible to enforce. The proposed regulations provide an excellent cover for a thriving trophy hunt and black market in grizzly bear trophy parts.
10. The Policy Intent Discussion Paper states that a grizzly "sustenance hunt" will be open to both resident and non-resident hunters. We believe it is obvious that hunters would not be coming from out of the province or country to kill grizzly bears for meat. BC decision-makers apparently intend to cater to trophy hunters under the pretext of serving up meals for hungry foreigners.
11. The Auditor General's report states that "MoE and MFLNRO are not being transparent about their management of grizzly bears." The report says that the government has not been forthright about the uncertainty of its data, and that plans and strategies claimed on the ministries' website are not being carried out. Transparency with the public, then, is a measure of the integrity of the management. We would add that transparency of public process is important. In this process we object to the follow conditions:
 - The process presents the public with a predetermined result — the opening of a meat hunt — and seeks public affirmation by offering choices as to how it should be enforced. VWS's input into these matters in no way means to affirm this process.
 - Consultations began September 5, yet were not advertised before it began, nor even for one month afterward, although advertisement is a long-established practice of public process.
 - The Ministry has been holding consultations with "stakeholders" that have been required to sign confidentiality agreements, so as to keep information secret from the public. So meticulous has the Ministry been in its intent to muzzle participants, that they are allowed to share the information with only five people, who then each must sign confidentiality agreements. This silences a large swathe of the potential opposition to the meat hunt. As you will be aware, VWS was offered an opportunity to become a stakeholder and refused, since we believe that confidentiality agreements are a betrayal of the public interest and signing them would be a betrayal of our membership.
 - Connected with this, information has been provided to selected parties in the process with the expectation that they will keep it secret from the public.

Conservation

A Policy Intent Discussion Paper describes a 230,000-hectare total ban on grizzly hunting in the Great Bear Rainforest (GBR). The area does not cover the whole GBR, let alone the whole coastal rainforest, and is only a tiny fraction of grizzly bear habitat provincewide.

Grizzly bears are threatened by unrelenting logging, mining, pipeline and road networks in their habitat. These have wreaked destruction on numerous salmon streams on the coast, and all the way up the Fraser River. Salmon farms have spread disease to wild salmon. Both coastal populations and inland kokanee populations have suffered steep declines, posing significant uncertainty to the survival of grizzly bears across BC.

According to the recent Auditor General's report, MFLNRO has failed to meet its commitment to identify critical habitat for grizzly bears. Thus it cannot adequately assess the impact of development activities upon the animals' habitat and, as a matter of fact, does not do so at all. These failures add up to cumulative mortalities for grizzly bears.

The government should not be saying that hunting of grizzly bears is sustainable, because it does not know with any certainty how many there are, or how many can be killed without impacts on the population. In the interior valleys, grizzly bears disappear from areas near logging roads, which indicates that many are shot from the roads without a permit. Grizzly bears are sometimes found shot from the highway, and many are shot in human conflict situations.

The Proposed Meat Hunt Regulations Are UNENFORCEABLE

Over the last 16, years the government virtually destroyed the Conservation Officer service. The damage has been so severe that the government cannot overnight just increase the service. A large amount of experience in the field was simply thrown away, and a new conservation service would have to be trained.

It is also difficult, at the best of times, to get convictions for poaching violations, since the shooter can always claim the bear attempted to attack him. So it is better to have the clearest and simplest possible regulations if they are to be effectively enforced.

Even with a trophy ban only, regulations for this purpose *should explicitly prohibit trophy hunting*; instead the proposed regulations only ban the possession of trophy parts. Enforcement officers must now find the parts in the possession of the hunters. One option presented by the government would allow hunters to leave the trophy parts in the forest. Hunters could transport the trophy parts to a freezer, and enforcement officers would never know unless Conservation Officers track down the corpse.

Another option would allow hunters to transport the parts to an inspection station for disposal. They would have an exemption for transporting the parts, and would be able to store the parts in their freezers up to 30 days. Enforcement officers could find hunters in possession of trophy parts in their vehicles or freezers, and be unable to obtain a conviction due to being unable to prove the intent and time frame of possession.

If the government decides to collect the trophy parts at an inspection post, it will then have to freeze them immediately. Wherever they go, they will rot if not refrigerated. A government that has only a handful of Conservation Officers at present, to enforce the law, would suddenly be in the business of managing grizzly bear parts and apparently a bank of freezers.

Regulations can require hunters to take the meat home, but they cannot force hunters to eat unpalatable meat. In many instances the meat would be thrown out or fed to dogs, the magnificent grizzly bears of our wilderness areas would simply be shot for sport and allowed to rot.

Public Process Considerations

We note that many of the groups signing the confidentiality agreements say they do not like doing so. They feel pressured to sign under the threat that they will not have sufficient information on which to base their positions, and will not receive select treatment from government, with full access to information, unless they sign.

VWS was told by the Minister's Executive Assistant that "stakeholders" are people and groups that have a more direct stake in a decision to be made. We assert that every British Columbian has an equal stake in our grizzly bears. Thousands are thrilled to see them. They flock to grizzly bear viewing tourism business

and buy the superb photography coming out of British Columbia's grizzly bear habitat. We want our children to inherit these same opportunities.

In the early 1990s the government of the day brought open public process to BC. That is something to be proud of, but public consultation has since devolved until there is hardly a shred of openness left. At one

time open public process was promoted by government as a great ideal. Today the very opposite is practiced: holding consultations in secret, with groups hand-selected by the government, whose identity is kept secret, is deemed "normal". Logic must tell us that this "normal" is a violation of the basic democratic rights of public participation. We ask your office to restore open public process.

Sincerely,

A handwritten signature in black ink that reads "Craig Pettitt". The signature is written in a cursive, flowing style.

Craig Pettitt
Director
Valhalla Wilderness Society