**KEY POINTS FROM VWS’S 13-PAGE SUBMISSION**

* VWS supports the rigorous enforcement of the *Species at Risk Act* for all Mountain Caribou.
* VWS supports a federal-provincial agreement because the provincial government has failed to provide adequate habitat protection. But we disagree with the content of the Section 11 Agreement because it is too weak to protect the caribou.
* VWS supports immediate cessation of activities destroying caribou habitat or displacing caribou while planning processes are ongoing.
* We support a significant increase in formal habitat protection and expanded snowmobile and heli-skiing closures in critical winter habitat.

**VWS ANSWERS TO THE GOVERNMENT’S QUESTIONNAIRE**

1. ARE THERE ANY ACTIONS IN ANNEX 2 THAT YOU STRONGLY DISAGREE WITH?
2. Two years to complete Herd Plans — BC has had a caribou recovery plan for 11 years; it shouldn’t take two years to add some more protected areas.
3. There is no moratorium on habitat disturbance for the Southern Group of Mountain Caribou: two more years of habitat destruction will mean that some herds don’t have enough habitat left to support long-term survival.
4. Planning tables stacked with logging, mining, energy companies and heli-skiing and snowmobile interests — these interests have a conflict of interest. We need scientific decision-making and science cannot be a political compromise.
5. “Best management practices” (i.e., logging) in matrix habitat — these are areas where the timber supply for logging, overlaps with caribou spring and early winter habitat. A large percentage has already been logged. We need to stop logging what little old-growth remains if we want to keep the caribou.
6. VWS opposes broad, indiscriminate shooting of wolves and other predators. Stop shooting wolves unless a herd is in bad trouble and needs immediate, short-term help. Do not use predator control on bears or wolverines because they are blue-listed. DO NOT USE POISON. Shut down predator-killing contests, there is no science in these contests, they are indiscriminate and ecologically damaging.
7. ARE THERE ANY ACTIONS IN ANNEX 2 THAT YOU STRONGLY SUPPORT?
8. Increased habitat recovery programs.
9. A caribou science panel, if it is composed of independent biologists.
10. Detailed Critical Habitat mapping — many areas used by the Southern Group of Mountain Caribou are not currently designated as critical habitat.
11. ARE THERE ANY ACTIONS THAT YOU THINK ARE MISSING FROM THE DRAFT SECTION 11 AGREEMENT?
12. There should be a moratorium on habitat disturbance in key areas needed for additional protection while the planning processes continue.
13. There is no real commitment to protecting additional habitat for the Southern Group of Mountain Caribou. There is no commitment to reduce the Allowable Annual Cut to save caribou old-growth forest.
14. There’s no commitment to expand closures of critical winter habitat from motorized winter and summer recreation.
15. The Central Selkirk caribou herd is left off of the list of herds requiring immediate attention; it is also left out of the list of herds to be considered for additional habitat protection. This herd was recognized by the federal government as being of particular concern. It is now our most southern herd and down to 25 animals.
16. OVERALL, DO YOU SUPPORT THE PARTIES ENTERING INTO THE SECTION 11 AGREEMENT? WHY OR WHY NOT?

VWS welcomes federal government involvement because BC will not protect a significant amount of habitat for wildlife. The BC government is biased towards maintaining an unsustainable amount of logging that is harming humans and other species in many ways. We need an agreement between the two governments, but a much stronger one, and if that is not forthcoming, the federal government should issue an Order to protect habitat right away.