



June 20, 2017

Honourable Doug Donaldson
Minister of Forests, Lands, Natural Resource Operations and Rural Development
PO BOX 9049 STN PROV GOVT
Victoria, BC, V8W 9E2
By e-mail: FLNR.Minister@gov.bc.ca

Dear Minister Donaldson

Re: Proposal for an alternative approach to wildlife management

Congratulations on your appointment as Minister. BC Nature is a federation of naturalist clubs across the province and we look forward to working with you and your ministry on important land management and conservation issues.

The BC Liberal government announced in April 2017, just prior to the provincial election, that they planned to establish an independent agency to manage wildlife within the province. This announcement, based on consultation only with hunter/trapper/outfitter groups, was met with dismay and strong opposition from numerous other groups, businesses and individuals in the province with a strong interest in BC's wildlife and ecosystems.

We urge you to end the discussions on establishing this external wildlife agency and instead direct the money already committed to this proposal to a more meaningful and publically-supported review of ecosystem management.

BC Nature, along with 17 other organizations and businesses have drafted the attached proposal to review the management of BC's wildlife and ecosystems. We strongly believe that this will lead to much needed improvements in how our living resources are managed. Our proposal will lead to better and more transparent science-based decision-making, improved public involvement and greater public trust in the government's ability to manage our wildlife and ecosystems.

Please let us know what the new government's intentions are with this proposed external management agency. We urge you to read and implement the attached proposal. Our organizations are eager to help create a new and trusted approach to ecosystem management in BC.

Yours truly,

Alan E. Burger, PhD
President: BC Nature (Federation of BC Naturalists)

On behalf of the following:

- **BC Nature (Federation of BC Naturalists)**
- **Nature Canada**
- **Wilderness Committee**
- **Pacific Wild**
- **Raincoast Conservation Foundation**
- **Commercial Bear Viewing Association of BC**
- **BC SPCA**
- **Humane Society International/Canada**
- **The Fur Bearers**
- **Justice for BC Grizzlies**
- **Bears Matter**
- **Great Bear Chalet Ltd.**
- **Wildlife Defence League**
- **Vancouver Humane Society**
- **Animal Justice**
- **Zoocheck**
- **Friends of the Lardeau River**
- **Lardeau River Adventures Ltd.**

CC:

Hon. John Horgan – Premier - premier@gov.bc.ca

Hon. George Heyman – BC Minister of Environment and Climate Change Strategy –
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Proposal for an Ecosystem-based Approach to the Management of Natural Living Resources in BC – an alternative to the wildlife-focused external agency proposal

20 June 2017

Background

On 22 March 2017 then Minister of FLNRO Steve Thomson announced that the BC Government would form a new external agency to manage wildlife in the province. The agency would be formed in the fall of 2017 with \$5 million start-up funding and \$9-10 million in subsequent years. The BC Government has given \$200,000 to the Fraser Basin Council to investigate ways to implement this external agency and engage stakeholders in discussions.

This external agency proposal has received enthusiastic support from the BC Wildlife Federation and other hunter/trapper/outfitter groups, but has been universally condemned by other naturalist, environmental and animal-protection groups. For example, BC Nature (Federation of BC Naturalists) outlined its concerns in a press release available here: <http://www.bcnature.ca/>

There is an opportunity to turn this narrow-focused proposal into something meaningful and positive that will benefit all natural ecosystems in BC and regain the public trust in managing BC's natural environment. We feel that the BC Government needs to manage public lands and publically-controlled living organisms in an open and transparent manner. There is an urgent need for the BC government to look beyond consumptive use of wildlife and put the priority on managing for healthy and functioning ecosystems.

This is also an opportunity to address the significant shortfall in funding and personnel within the responsible BC Govt ministries, which has greatly restricted and debilitated management of BC's natural ecosystems over the past 2 decades. This neglect is clearly and quantitatively outlined in the recent paper by Eastman et al. (2013):

Eastman, D. S., R. Archibald, R. Ellis, and B. Nyberg. 2013. Trends in renewable resource management in BC. *BC Journal of Ecosystems and Management*, [S.l.], v. 14, n. 3, mar. 2014. URL: <http://jem.forrex.org/index.php/jem/article/view/556>

Proposal

BC Nature and its partners suggest the following:

- That the proposal to establish an external agency to manage BC's wildlife be dropped immediately, and that, instead, a wider review of ecosystem management and conservation be undertaken, focused on strengthening the government ministries and departments currently responsible.
- The BC Government use the \$200,000 given to the Fraser Basin Council to initiate a thorough review of the management and conservation of ecosystems and natural living resources in British Columbia.

- This review will not be restricted to any target group of organisms, such as mammals and birds that are hunted or trapped, but will cover all natural living resources, ecosystems and native biological communities under the jurisdiction of the provincial government (i.e., excluding marine organisms).
- The review will not include a detailed review of forest and range management, except as they impact other living organisms, such as wildlife.
- The review will include all groups and BC residents with an interest in natural living resources, ecosystems and wildlife.
- As part of the review process the government will form a **Panel of Experts** to guide the review and lead the process in formulating new policies for managing and conserving ecosystems and natural living resources in British Columbia. This panel should include knowledgeable people, both male and female, from across the province, including:
 - At least three experienced and unbiased (i.e., not committed to any special-interest group or commercial interest) professionals from outside the government, representing wildlife biology, forestry/range management and conservation biology;
 - First Nations representatives;
 - One representative of the hunting, trapping and guide-outfitting groups;
 - One representative of the commercial non-consumptive user groups, such as the bear-watching or birding-guiding industry, preferably so as to provide equal representation of 'consumptive' and 'non-consumptive' interests;
 - One representative of the environmental and naturalist non-governmental organizations;
 - One representative of humanitarian and animal-welfare organizations;
 - An economist familiar with the economics of natural resource management.
- The Panel will elect a Chair from among its members who will lead the discussions and chair the meetings and workshops.
- The BC Government will provide secretarial and logistical support for this panel to facilitate its meetings, workshops, exchange of information and drafting of a final report.
- Part of the review process will include a 2-day workshop, led by the Panel named above, with invited representatives from the full range of stakeholders and BC residents interested in ecosystem and wildlife management.
- If necessary the government should appoint and fund an independent facilitator for public meetings, with the necessary skill and experience to deal with conflicting viewpoints.
- Written submissions will also be solicited from the public and interested groups within the province.
- Taking into account the results from the workshop and written submissions from all interested parties, the Panel will draft a set of recommendations for

enhanced management and conservation of living natural resources within BC. The recommendations should include, but not be limited to, the following:

- Changes in the laws covering natural ecosystems and their inhabitants within British Columbia;
- Changes in BC Government policies covering natural ecosystems and their inhabitants;
- Changes in funding for research, management and conservation of natural ecosystems and their inhabitants in the province;
- Methods to involve all interested parties in ongoing conservation of natural ecosystems and their inhabitants within the province;
- Ways to promote public appreciation, knowledge and stewardship of natural ecosystems and their inhabitants in the province.
- Ways to promote increased and sustainable economic benefit from the natural ecosystems and their inhabitants in the province;
- Recommendations to deal with the likely long-term effects of climate change on ecosystem management and conservation in BC.
- Part of the review process should include a thorough, independent and quantified analysis of the economic benefits of natural living resources and ecosystems to the people of BC. This should include, but not be limited to, the economic costs and benefits of:
 - Wildlife-watching and nature-focused tourism;
 - Hunting, trapping and guide-outfitting;
 - Expenditures within BC on equipment, supplies, travel, camping, accommodation and other related costs derived from people using or enjoying the living natural resources within the province;
 - The costs and benefits to the BC Government for administering hunting, trapping, fishing, outdoor recreation and other relevant permits and licences;
 - The review should consider the value of ecological services of nature (including such far-ranging items as bee pollination, water quality and water supply).
- The Panel will report its recommendations to the BC Government and to the BC public by a set date (ideally 31 December 2017, or early in 2018 if this date is not possible).

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The proposal is endorsed and supported by the following:



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Commercial Bear Viewing Association of BC

**Commercial Bear Viewing Association of BC**

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