

August 17, 2023



Attn: Stephen MacIver
Stephen.MacIver@gov.bc.ca
The Fish and Wildlife Branch,
BC Ministry of Forests

RE: Engagement on the Draft Provincial Grizzly Bear Stewardship Framework

Hunters for BC (H4BC Hunt.Gather.Conserve. Society) has reviewed the B.C. Provincial Government's Grizzly Bear Stewardship Framework and provides the following response to their Public Engagement Request.

H4BC supports the reinstatement of a resident Grizzly bear hunt in B.C.

Although certain Grizzly bear populations within our province necessitate continuous recovery endeavors, several other populations do not. Grizzly bears are well-documented as apex predators. The [Moose Population Research Project](#) specific to British Columbia highlights notable occurrences of cow moose mortalities during the months of May and June annually, which coincides with the most critical period for moose and results in the loss of our primary population contributors. Although the historical Grizzly bear harvest through licensed hunting stood at approximately 2%, when used as a conservation and ungulate species recovery strategy under regional management, the impact of apex predator harvesting on ungulate populations will inevitably exceed zero and should not be disregarded.

Furthermore, it is imperative that as a civil society, we pledge to ensure the safety, appreciation, and enjoyment of the land for every resident of British Columbia. Especially for those residing in rural areas, the coexistence of apex predators and humans is seldom harmonious, underscoring our duty to consider the impacts of thriving Grizzly bear populations on our fellow inhabitants. Safeguarding their enjoyment and well-being falls upon the collective responsibility of us all.

H4BC supports First Nations initiatives to reinstate the Grizzly bear hunt beyond their cultural and ceremonial purposes, as is their right as co-managers of wildlife. The debate surrounding reinstatement of the Grizzly bear hunt intersects with the broader issues of Indigenous rights and representation. A government committed to UNDRIP and co-governance of wildlife cannot ignore the numerous First Nations communities that are seeking a reversal of the ban on licensed, regulated Grizzly bear hunting.

Governments routinely make decisions they believe serve the greater good of their citizens, even when those decisions are not universally popular. The recent decision to [decriminalize personal possession of illicit drugs](#) serves as a notable instance where the majority of the public does not lend their broad support.

HUNTERS FOR BC
5070 MacKinnon Road
Peachland, BC V0H 1X2
www.HuntersForBC.ca

Government inconsistency raises questions about the alignment between prioritizing citizen emotions and maintaining ecological balance, particularly in the realm of wildlife and habitat management. Emotional management of wildlife, driven by sentiment rather than evidence, often yields suboptimal outcomes, potentially undermining the delicate equilibrium of ecosystems.

The wildlife, including Grizzly bears, that we enjoy today is the consequence of active wildlife management that has largely included hunter harvest. It's not accidental survival and the resistance to management comes primarily from urban belief in miraculous self-regulation. With predator control, there would be more ungulates and consequently, more food for grizzly bears.

We advocate for a B.C. Government pledge to allocate funding and meaningful legislation for the implementation of actions, demonstrating a resolute dedication to science-driven management principles.

When a government commits financial resources to support the actions of a wildlife stewardship plan, the benefits will extend far beyond the targeted species. Healthy ecosystems have cascading positive effects on air and water quality, soil stability, wildlife sharing habitat and even climate regulation. Lack of financial and subsequent legislative support for proposed stewardship plans targeting any species will inevitably result in goals not being achieved.

We express our frustration with what we perceive to be an overall “rinse and repeat” of previous B.C. Government commitments to the 1995 Grizzly Bear Conservation Strategy. As noted in the [2017 An Independent Audit of Grizzly Bear Management](#), there have been similar commitments made to Grizzly bears that have failed to reach their intended goals. Developing concrete, time-sensitive strategies with clear-cut priorities and actionable steps will enhance our Grizzly bear populations' prospects. Looking back in another three decades, we could be commemorating achievements instead of revisiting the need to rework stewardship plans for Grizzly bears, or any other species, yet again.

The lack of concrete actions outlined in this Framework raises concerns, leading us to question whether this might be another attempt to develop a plan without clearly defined and attainable outcomes.

We hold significant apprehensions regarding various absent components within the Grizzly Bear Stewardship Framework, such as precise inventory plans, impactful monitoring approaches, clearly defined GBPU (Grizzly Bear Population Unit) objectives, sustained dedication to research, and the identification of priorities regarding large connecting habitats. These are a few instances where we perceive a deficiency in well-defined goals and actionable measures.

The Grizzly Bear Stewardship Plan developed unfortunately falls short in its efforts to action the pressing issue of human-wildlife conflict. While the plan does acknowledge the importance of mitigating conflicts between humans and Grizzly bears, it lacks a comprehensive strategy for significantly reducing such conflicts. It is evident that key components, such as the reduction of human attractants and the establishment of a robust bear conflict support staff, have been identified as necessary actions to undertake. Regrettably, these essential measures have not been adequately integrated into the plan, perpetuating a critical concern that directly contributes to the mortality of Grizzly bears.

To secure the well-being of these magnificent creatures, it is imperative that the plan be revised to include a more comprehensive conflict reduction approach that effectively addresses human-wildlife interactions and fosters coexistence.

Commercial Bear Viewing Framework – 100 Meter Distance

Commercial Bear Viewing and hunting can and should co-exist. We do disagree with the popular belief that Commercial Bear Viewing is a non-consumptive use of a resource.

Bear viewing has been found to increase the risk of habituation which inevitably results in a bad outcome for the bears. Additionally, bears have been found to modify their feeding behaviour in the presence of humans. This can result in reduced feeding and abandonment of feeding areas which can affect their nutrition and energy intake.

The presence of human observers can cause stress for bears, leading to increased energy expenditures as they divert energy away from activities like foraging or perceived threats. Bear viewing sites can attract numerous visitors, leading to competition among bears for limited food resources. Lastly, human presence may disrupt breeding activities or maternal care, which can be crucial for cub survival.

What is bear viewing, if not consumptive use of the land and its wild inhabitants with the potential for very real negative impacts. At a minimum, we propose the elimination of the 50 – 150-meter viewing distance and advocate for the establishment of a stringent 100-meter policy. Our aspiration is for robustly formulated legislation to direct the licensing and conduct of bear viewing activities.

It's unrealistic to expect the public to comprehensively grasp a 75-page stewardship document and subsequently provide meaningful feedback within that extensive content, hindering active and thoughtful public participation.

We write to offer a suggestion for improving the communication strategy surrounding Grizzly bear stewardship; indeed, all government feedback requests share similar issues. While we understand the importance of comprehensive documentation, we believe there is room for enhancing meaningful public engagement by simplifying the presentation of vital information.

Currently, the 75-page Grizzly Bear Stewardship Framework is overwhelming and will deter widespread understanding, likely to affect the value of feedback submitted. We propose the B.C. Government introduce a more concise and accessible version of these types of documents that distills key points and strategies into a format that is easier for the public to digest.

By creating a condensed version that highlights the most critical information, we can capture the attention of a broader audience and encourage greater awareness and participation. This simplified document would serve as an introductory guide, outlining the essential aspects of Grizzly bear stewardship, its significance, and the proposed strategies for their conservation.

For those who desire a deeper understanding, the full 75-page document can still be made readily available. This approach will cater to both those seeking a comprehensive understanding and those who prefer a more succinct overview.

Ultimately, this initiative aims to bridge the gap between the expert research within the comprehensive document and the public's engagement. Through simplifying intricate concepts into more accessible language, individuals will gain the ability to engage actively in Grizzly bear stewardship initiatives. This will lead to a heightened sense of community involvement and endorsement, enhancing their shared understanding of the topic and resulting in more dependable responses to your feedback solicitation.

Yours in conservation,

A handwritten signature in black ink, appearing to read 'Robin Unrau', with a long horizontal flourish extending to the right.

Robin Unrau, President
Hunters for BC
H4BC Hunt.Gather.Conserve. Society
www.huntersforbc.ca

cc: Jennifer Psyllakis
Jennifer.Psyllakis@gov.bc.ca
Director, Wildlife and Habitat Branch
BC Ministry of Forests, Lands, Natural Operations and Rural Development