

December 27, 2015

Fish and Wildlife Branch
Ministry of Forests, Lands, and Natural Resource Operations
PO Box 9391, Stn Prov Gov
VIA EMAIL: FishandWildlife@gov.bc.ca

RE: Proposed Changes to British Columbia's Regulations on the Grizzly Hunt; PN #2147

Animal Justice Canada Legislative Fund (“**Animal Justice**”) is a Canadian non-profit organization dedicated to enhancing legal protections for animals. The organization is comprised of lawyers, law professors and law students that seek to use the law and legal skills to protect animals.

Animal Justice appreciates this opportunity to provide comments regarding the Ministry of Forests, Lands and Nature Resource Operations (“**MFLN**”) proposed change to the regulations under the *Wildlife Act*, RSBC 1996, c 488 (“**WA**”).

Regulation Changes

As you are aware, the proposed amendment to the *WA* is as follows:

- a) Amend the Range of Authorization in Limited Entry Hunting Zone 7-52 from 1-50 to 1-150 for both spring and fall grizzly hunts.

Provided Justification

The MU 7-52 area supports the largest number of grizzly bears within the Peace Region. Currently, a maximum of 50 resident hunters are given permits to hunt grizzly bears in both the spring and fall seasons. The number of bears killed under this program consistently falls under the number of permits given out, averaging 4 bears killed by resident hunters, and 4 bears killed by non-resident hunts annually according to government statistics. The proposal states the maximum allowable mortality is 26 bears a year (6% of the estimated population) and thus, increasing the maximum number of permits granted to resident hunts to 150 would not pose a threat to conservation.

The proposed amendment is justified as being in keeping with conservation efforts and in response to the demands of resident hunters.

Commentary

Animal Justice submits that expanding the grizzly hunt is not in keeping with conservationist goals and contrary to the beliefs of the vast majority of British Columbians. Animal Justice also submits that animal welfare is a consideration that must be taken into consideration.

Conservation Concerns

Though the grizzly bear population is considered stable in this region, population estimates are simply ‘best guesses’ based on population modelling. Extensive fieldwork that would provide a more accurate picture of the number of grizzly bears in the province has yet to be conducted by the government. Indeed, though the BC government keeps track of the reported number of bears killed pursuant to the grizzly hunt, some reports indicate that human-caused grizzly bear mortalities, including female grizzly bear mortalities have not been managed below government thresholds.¹ Grizzly bears also have low reproduction rates, making them very slow to recover from population decline. Increasing the hunt three-fold in the face of such problems and uncertainties could lead to drastic declines in grizzly bear populations. As large predators, such a decline would also have severe effects on their ecosystem.

Hunters: A Minority Population

Though hunters may support an expanded grizzly hunt, a recent poll shows that 91% of British Columbians are opposed to the grizzly hunt.² The poll also shows that opposition to the bear hunt is strong across both urban and rural populations. Indeed, this September, a video of a grizzly bear being shot by hunters attracted over a million views in two days and attracted widespread criticism of the grizzly hunt.³ First Nations groups on BC’s north and central coasts have also voiced strong opposition to the grizzly hunt and in 2012, banned trophy bear hunting on their lands.⁴

Expanding The Spring Hunt: Killing Mother Bears and Orphaning Cubs

Hunting in the spring is especially problematic because it is a time of vulnerability for bears and other animals that have endured winter and lost body mass. Bears are hungry when coming out of hibernation, newborns must be nourished, and mothers are anxious to feed their young. For these reasons, it is illegal to hunt bear cubs and female bears with cubs. However, it is impossible and unrealistic to assume that a hunter will be able to distinguish a bear’s sex from a distance and cubs are often kept hidden in safety, making

¹ Kyle Artelle et al, “Confronting Uncertainty in Wildlife Management: Performance of Grizzly Bear Management” (2013), 8:11 PLoS ONE: e78041, online:

<<http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0078041>>.

² Gary Mason, "Opposition to trophy hunting overwhelming, poll finds amid grizzly debate", *The Globe & Mail* (2 October 2015), online:

³ Andrea Woo, “Graphic video fuels calls to end grizzly bear hunt in B.C.”, *The Globe and Mail* (9 September 2015), online: <<http://www.theglobeandmail.com/news/british-columbia/graphic-video-fuels-calls-to-end-grizzly-bear-hunt-in-bc/article26298947/>>.

⁴ *Ibid.*

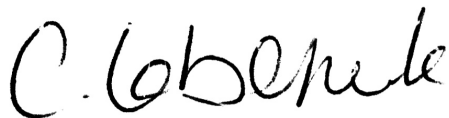
it unclear whether a roaming female has cubs. Consequently, increasing the number of permits issues for the spring grizzly hunt will necessarily result in greater orphaning of young bear cubs.

Conclusion

The proposal submits that the grizzly hunt be expanded based on hunter demand and the belief that meeting this demand would not pose a conservation concern. Animal Justice submits that the opposition to the grizzly hunt by First Nations groups and the vast majority of British Columbians, combined with live conservation concerns suggest that the proposal be rejected. Any anticipated economic benefit to the province of an expanded grizzly hunt can be met and far surpassed through curtailing the grizzly hunt, and encouraging bear viewing tourism as shown in a study of bear tourism in the Great Bear Rainforest conducted by Stanford University and the Center for Responsible Travel.⁵ Grizzly bears not only have more economic value alive than dead, but deserve to be treated in a manner in keeping with the dignity and respect that should be accorded to all animals in British Columbia.

Animal Justice appreciates the opportunity to comment on the proposed changes and hopes that the MFLN will take the concerns highlighted in this submission into consideration in respect of the proposed change.

Yours sincerely,



Camille Labchuk, BA, JD
Executive Director
Animal Justice

⁵ Center for Responsible Travel, *Economic Impact of Bear Viewing and Bear Hunting in the Great Bear Rainforest of British Columbia* (Washington: Center for Responsible Travel, 2014), online: <http://www.responsibletravel.org/projects/documents/Economic_Impact_of_Bear_Viewing_and_Bear_Hunting_in_GBR_of_BC.pdf>.