

**BC Wildlife Federation Response:
B.C.'s Proposed Grizzly Bear Regulations**



The BC Wildlife Federation is British Columbia's largest and oldest conservation organizations. Our 50,000 members are passionately committed to protecting, enhancing and promoting the wise use of the environment across the province of British Columbia for the benefit of present and future generations. Our members donate over 300,000 hours per year to stewardship activities.

Executive Summary

The BCWF is extremely disappointed by the Provincial Government's deviation from science-based wildlife management. Managing one species in isolation of others undermines the fundamentals of the North American Wildlife Conservation Model. These proposed changes delegitimize sustainable use including hunting, trapping and fishing.

What has been portrayed by anti-hunting organizations, and is now supported by government, is not reflective of the realities of resident hunting.

The proposed changes violate the cultural heritage of resident hunters, values which are shared globally with other hunter-gatherer societies. Intentionally throwing out useable parts of wildlife is considered wasteful.

The proposed changes will result in more habituated bears, as well as human-bear confrontations and attacks in both the front and backcountry. The taxpayer will be responsible to manage bears over the long-run which will reduce the social value of grizzly bears, and funding for grizzly bear conservation.

The BCWF expects government to manage wildlife based on science. Using outcome-based polls, paid for by anti-hunting organizations, has marginalized government's ability to represent the public interest.

The public should be making evidence-based decisions, as should government, when it comes to conservation and wildlife related policies. These proposed regulations have undermined science-based wildlife management in favour of social and political decisions.

Hunting in Context

The rapid development of North America by Europeans in the 19th century resulted in the widespread decline of fish and wildlife populations due to commercial hunting and habitat loss. Hunters and anglers recognized that the approach was not sustainable and that limits and ethics were needed in order to protect land, fish and wildlife for future generations. To differentiate themselves from commercial over-hunting, these hunters were referred to as sport hunters thereafter. The first National Parks in the United States were created by hunters and anglers to give fish and wildlife much needed refuge to halt precipitous declines. This was the beginning of what is now known as the North American Wildlife Conservation Model (NAWCM).

The tenets of the model are as follows:

1. Wildlife resources are a public trust
 - a. Natural resource and wildlife management occurs through government agencies for the benefit of future generations.
2. Market Hunting is prohibited
 - a. Commercial hunting and the sale of wildlife is prohibited to ensure sustainable wildlife populations
3. Allocation of wildlife by law
 - a. Every citizen has the opportunity, by law, to hunt and fish.
4. Wildlife killed only for legitimate purposes
 - a. Wildlife may be killed for food, fur, and self-defence and property protection. Killing wildlife merely for antlers, horns or feathers is not deemed legitimate.
5. Wildlife is an International Resource
 - a. Many of our wildlife populations, particularly migratory birds are shared and shall be managed collaboratively.
6. Science is the tool for wildlife management
 - a. Science is the proper tool to discharge wildlife management.
7. Democracy of hunting is standard
 - a. Laws associated with hunting and fishing are shaped by a public process.

The NAWCM is the reason North America enjoys such diverse, intact wildlife populations and landscapes. Globally, it is one of the most successful conservation models and continues to propel and fund the conservation movement in North America. This is the lens through which hunters and anglers view conservation through in North America.

Hunting in BC

After decades of decline, hunting by British Columbians is on the rise. Between 2005 and 2015 resident hunter licence sales increased more than 30 percent from 85,633 to 111,711. Hunting's popularity is increasing; key drivers appear to be obtaining healthy, organic, and ethically-sourced meat and a move to reconnect with nature. The number of females taking up hunting has also gone up significantly. Hunting is increasingly becoming a family activity.

Between 2005 and 2015 hunting licences for all species increased; this trend is not limited to prey species. The number of resident hunters who hunted cougar more than doubled, as did those for lynx, and bobcat. Black bears hunters increased more than 90 percent between 2005 and 2015 from 7,206 to 13,874.

Why British Columbians Hunt

In 2009 a review of British Columbia's Limited Entry Hunting system was conducted to review hunter motivations, and satisfaction related to hunter recruitment and retention. Of 10 factors affecting the hunting experience getting out in the wilderness, the opportunity to harvest a legal animal, and spending time with friends and family were the three most important. The opportunity to harvest a trophy was the least important.

B.C.'s hunters self-identified as meat hunters (35.8%); meat, then selective (43.5%); selective (18.8%) and trophy (1.9%). Hunters' definition of a trophy hunter and the public's, media's, and elected officials definition appear to be different. The public perception is that the animal is killed only for its head/horns/antlers and the meat is wasted. The resident hunting community's understanding is trophy hunters are looking for an old male specimen, and these hunters retain and use the edible portions of the animal. Hunters who waste edible portions of wildlife are poachers. While only 1.9 percent of resident hunters identified themselves as trophy hunters, over 20 percent of respondents indicated they had applied to hunt grizzly bears. It appears most hunters who apply to hunt grizzly bears do not consider themselves trophy hunters.

The Hunting Experience

While resident hunters' values are shifting to focus more on a sustainable, organic, ethically-raised source of protein, hunting is about far more than quality protein. Hunting is about more than killing-in B.C., most hunters are unsuccessful. For 2015, only 18 percent of elk and moose hunters, 37 percent of deer hunters, 25 percent of black bear hunters, and 15 percent of grizzly bear hunters were successful. The hunting regulations and limits are designed to limit hunters' efficiency, to encourage fair chase (an ethics and regulatory based approach that is also known as "sport hunting"), and to allow as many hunters as possible to participate.

Hunters are in fact hunting for an experience. The experience is about planning, organizing, spending time with friends and family or spending time alone in nature - learning, watching, interacting and caring for natural systems, and sometimes killing an animal. Nature deficit disorder is real, and the need to unplug from modern life is more important more than ever. For an increasing number of British Columbians, this need is being filled by hunting.

While the motivations to hunt vary from hunter to hunter, and throughout a hunter's lifetime, the connection to the land, nature and sustainability is focal and undeniable.

The Harvest

Hunters share their harvest with friends, neighbours and co-workers. The hunting experience comes with a sense of pride, self-sufficiency, respect for wildlife, and a piece of ethically-sourced meat that motivates hunters to share; it is the same motivation as the neighbour who shares the spoils from their garden. Kids who might not normally eat all their dinner, ensure they eat every bite of an animal they harvested because they have made a significant physical and emotional investment which builds a deep respect and connection to the land and that animal. Even at a young age, the respect a young hunter has for an animal which he/she has harvested is engrained. Appreciating and sharing the harvest and the story of the hunt is in our DNA. While killing is a part of hunting, it is not the sole focus or focal point of the hunting experience. Hunters are often the first to advocate for hunting restrictions, even when the science tells them hunting is not affecting wildlife populations.

Resident Hunters Contribution

Resident hunters in B.C. spend approximately \$230 million dollars/year (2012 hunting season) hunting in their home province every year. This number has increased annually. In 2016 resident hunters spent \$11.2 million dollars on hunting licenses and fees, of which only \$1.9 million is dedicated to wildlife conservation via the Habitat Conservation Trust Foundation. Resident hunters spent approximately \$5 million on grizzly bear hunting and \$200,000 on grizzly bear species licences.

The BCWF's membership donates approximately 300,000 hours annually (~144 full-time person-years of work) to stewardship projects. Working collaboratively with our conservation partners across the province annually we contribute tens of millions of dollars of in-kind and direct support by acquiring conservation lands, conducting ecosystem restoration, funding wildlife research, and inventory.

Hunters and anglers have, and continue to be, the leaders of conservation and sustainability in British Columbia. The BC Wildlife Federation was one of the principal drivers to change provincial wildlife policy around grizzly bears decades ago to move the species social perception as one of a pest to one of value.

Science of Sustainable Human-Caused Mortality of Grizzly Bears

The scientific model (Harris 1984, 1986) used by government estimated a maximum human caused mortality (unknown, non-hunting mortality, hunting mortality) of 6.5 percent was sustainable if greater than 70 percent of the mortality was male. This model was based on a female natural survival rate of 92 percent. More recent data has shown the female natural survival rate is actually much higher, between 98-99 percent in Yellowstone, Northern Continental Divide Ecosystem, Banff and Flathead grizzly populations. Even in the most unproductive landscapes such as the Northern Continental Divide and Banff the model is far more conservative than empirical data suggests. Data from the Flathead, the most intensively studied grizzly bear population in North America from 1979-1998 suggest a harvest rate of 10.3 percent would have been sustainable.

Anti-hunting organizations have written a number of papers, including those which have been peer-reviewed, laying claims that grizzly bears would be extinct in B.C. by 2020 due to sport hunting, or more recently that risk and uncertainty in populations and hunting could be undermining the viability of grizzly bears. Nearly 20 years after these claims were originally made, they remain unsupported. Conversely, empirical evidence illustrates grizzly bears are recolonizing areas where they have not been seen for decades and most populations appear to be stable or increasing.

Between 2005 and 2015 the Elk Valley population declined, but that was principally driven by non-hunting human caused mortality. BCWF clubs were the first ones to contribute time and money to support research efforts to ensure the viability of grizzly bears even after the hunting season was closed. The anti-hunting organizations were nowhere to be found when funding was needed to pay for research.

It should be acknowledged that while the proponents of the anti-hunting message excel at maximizing their media attention, these organizations and individuals are poorly respected within the conservation, research and academic community. These are the same organizations and individuals who have opposed mountain caribou recovery in favour of wolves despite the recommendations by top scientists. The top bear ecologists in North America are cognizant that the 'headlines' are not consistent with reality and that the message being purported is simply an agenda, not science driven.

Wildlife Management

Grizzly bear hunting is a part of wildlife management. Introducing human populations to the ecosystem, particularly in today's growing population, will require intervention and management. For example, to recover caribou populations, it will be necessary to secure habitat, reduce local ungulate populations and conduct targeted predator removals. Fire suppression, highways, salvage logging, hydro-electric development and urban sprawl are all having a negative impact on wildlife populations. Putting one species on a pedestal in isolation of all others is an immature, beliefs-based approach, which is diametrically opposed to science-based wildlife management.

Proposed Hunting Regulation

Hunter Feedback

To date the BC Wildlife Federation has received varied feedback with regards to the proposed regulation changes. While the organization supports meat retention of grizzly bears, the membership also feels that this proposed policy is wasteful- this includes hunters who have never hunted grizzly bears and have no intention of hunting grizzly bears. Hunters and anglers believe that as much as possible of the animal harvested should be used with minimal waste. To force people to throw useable parts of an animal away is diametrically opposed to the direction of the NAWCM and does not appear to be supported by the hunting community

Trophy Hunting and Trophy Parts

Keeping the antlers, horns, hide or head of fish and wildlife is a cultural norm in B.C. and is consistent with every hunter-gatherer community globally. All cultures which hunt have worshipped and honoured animals in their written and oral history; it is in our culture and our DNA to share stories about our natural world and the experiences we have had with the environment.

New hunters often keep the antlers of the first deer they shoot, and the hide or skull of the first black bear they shoot. Big or small, old or young, keeping the antlers, horns, skull or hide of an animal is a way to remember the hunting experience and pay respect to the animal. This is also a universally adopted cultural norm – while it can be associated with stature and ego in some cultures, keeping antlers and hides is done universally across hunting communities. It is not consistent with the 'trophy hunting' concept being peddled by anti-hunting organizations.

Trophy hunting has been defined by some of the anti-hunting organizations as seeking out the largest males; these ‘trophy hunters’ keep only the hide and head and are motivated solely by egos. Grizzly bears have a life expectancy of ~25 years. According to the hypothesis put forward by anti-hunting organizations we should expect a male only harvest and most of the bears harvested being well into their teens or exceeding 20 years of age. The data does not support that assertion. Between 1980-2016 ~35 percent of the grizzly bears harvested by resident hunters were female. The average age of grizzly bears harvested by resident hunters is less than 8 years old. The majority of grizzly bears being harvested by resident hunters are not “old trophy males”. The evidence does not support the hypothesis, nor does it meet the beliefs put forward by government.

While 1.9 percent of resident hunters self-identify as trophy hunters, and anti-hunting organizations have identified grizzly bear hunters as a ‘fringe minority’ most years ~9,000 (10-12%) hunters who apply to limited entry hunts apply for a grizzly bear LEH. Between 2010-2015 nearly 21,000 different hunters applied for a grizzly bear hunt.

Delegitimization of the NAWCM

This proposed regulatory approach delegitimizes the tenets of the NAWCM and the concepts of sustainable use, public trust, and the use of science. While hunters do not support the concept of ‘trophy hunting’ (leaving the edible portions) of black bears and grizzly bears it is likely they are supportive of sustainable use of black bear and grizzly bears.

Now that government has proposed this change, the BC Wildlife Federation expects anti-hunting organizations which pushed for the ban on “trophy grizzly bear hunting” to go after the hunting of all carnivores, and other species such as sheep and goats as well as catch and release fishing. The narrative by anti-hunting organizations will shift from “we are opposed to trophy hunting” to we only support “hunting for sustenance”. By managing one species in isolation of all the others government has created a hyper-political environment which will encourage anti-use organizations to further erode consumptive use activities. By delegitimizing grizzly bear hunting, government will not have a legitimate rationale to combat any further pressures from anti-hunting which will undoubtedly arise over other species; this socio-political decision certainly may have a long-term impact on science-based hunting.

The BCWF expects the proposed regulation to have a long-lasting negative effect on hunting and angling in British Columbia.

Science

Currently our grizzly bear monitoring and management requires the age and sex of the bear harvested. This is obtained by bringing the skull and hide in, to prove evidence of sex and pull a tooth to age the bear. Forcing hunters to leave all of the scientific evidence in the forest is diametrically opposed to evidence-based decision making. The alternative policy is to require a hunter to pack out close to 100 pounds of an animal to have it destroyed. This goes counter to the frivolous use tenet set out in the NAWCM and does not sit well with hunters. While things like the gall bladder and penis bone are illegal to possess that is because of black market trade, an illegitimate use of wildlife. The ban on ‘trophy parts’ is not consistent with the ban on gall bladders and penis bones.

Hunting's Role with Grizzly Bears

In Banff, and the Yellowstone Continental Divide Ecosystem 75-85 percent of all bears are killed by humans. Neither of these areas has hunting. Banff has one of the highest rates of human killed bears anywhere in North America – there is no hunting in Banff, yet they are killing more bears than any other single place. In the Elk Valley, B.C., recent work has documented one of the lowest survival rates of grizzly bears in North America, despite having no hunt.

In B.C. where hunting occurs the rate at which bears are killed is nearly the same as National Parks, and other areas where there is no hunting.

Recent research of problem bears has demonstrated it is a learned behaviour, and generations of bears can become habituated to people, most often ending up in destruction of the mother's offspring. As shown in Banff, and Yellowstone whether there is hunting or not, bears will end up being killed by humans. While there has been no empirical review by well-respected researchers, it appears bears which exhibit bold behaviour are taught to have less fear of people by their moms; those are likely the bears harvested by hunters. Through hunting, the BCWF believes hunters are selecting bears which would become habituated or problem bears.

To deal with these problem bears the choice is to have hunters hunt bears, use the whole bear, and pay to fund conservation activities, or have the public pay conservation officers to deal with human-bear conflict, kill the same number of bears, and throw the entire bear in the garbage. Due to this proposed regulation it is expected the number of habituated bears, confrontations and attacks in both the front and back country to go up.

Consultation

The BC Wildlife Federation is supportive of including a more diverse group regarding conservation, fish and wildlife management. First Nations must be involved, and to move effective conservation forward in the province all legitimate interests must be represented. There are a number of ENGOs which the BCWF collaborates with regularly.

At the same time the BCWF is completely opposed to participating in any process which legitimizes fundraising organizations, or organizations which:

- 1) Are anti-hunting
- 2) Promote hate
- 3) Have no resident membership in B.C.
- 4) Do not participate meaningful on-the-ground conservation projects in B.C.
- 5) Perpetuate falsehoods about conservation, wildlife management and science

The BCWF will see the inclusion of these types of organizations as government support to eliminate hunting and angling in BC.

Conclusion

The BC Wildlife Federation believes the proposed regulations are out of touch with hunters and sustainable use in B.C. B.C. is charting a path away from sustainable use and the NAWCM. As the organization that led the change moving grizzly bears from pests to a valued species, the BCWF believes this direction will decrease the social value of grizzly bears in B.C. This proposed regulation delegitimizes hunting, and particularly trapping. There is significant valid concern that government will move on to other regulation changes due to more well-funded anti-hunting campaigns.

Hunters appear to see this policy as wasteful and prejudicial to hunting. With a reduction in harvest over time we expect to see more human-bear conflict and just as many bears, if not more bears, die due to conflict as have been killed by hunting. While this will take years to play out, we also expect to see more bear attacks in B.C.'s front and backcountry. The proposed regulation will put taxpayer dollars at the forefront of grizzly bear management in B.C. Furthermore, this proposal has effectively put one species in an ecosystem on a pedestal which will undoubtedly result in negative externalities for other species and has encouraged the anti-hunting organizations to continue to delegitimize hunting, an activity that is rapidly growing in B.C.

It would be best for government to invest in social science research to better understand First Nations, the public and hunters perception around hunting, particularly grizzly bear hunting, before making a decision on this issue. Rationalizing changes to public policy through outcome-based polls is reflective of a reality-TV show, not the democratic process.

A number of First Nations have expressed significant interest in increasing grizzly bear harvest. While the polls paid for by anti-hunting organizations have identified that the public and hunters do not support "trophy hunting of grizzly bears" (without a clear definition of trophy hunting), they have not identified where the public sits on issues related to grizzly bear hunting, conservation, and motivations related to sustainable use. There is clearly a lack of education and understanding regarding what grizzly bear hunting really means, and the unintended consequences that may result from ending the sustainable harvest of this species. For government to use polls paid for by anti-hunting organizations as a decision-making tool is a blow to democracy. The BCWF believes it is government's responsibility to gather the appropriate information before making unilateral decisions on these types of policy issues.

The BCWF would like to see government fund and conduct a proper review around First Nations, hunters, and public perceptions of hunting with a specific focus on grizzly bear hunting.