



**Wild Sheep Society of British Columbia**

#101-30799 Simpson Road  
Abbotsford, BC, V2T 6X4  
Tel: 250-619-8415  
Email: [kstelter@wildsheepsociety.com](mailto:kstelter@wildsheepsociety.com)

August 25th, 2023

Honourable Bruce Ralston  
Ministry of Forests  
Room 248 Parliament Buildings  
Victoria, BC, V8V 1X4

**Subject: Stewardship Framework for Grizzly Bear**

Dear Minister,

We are pleased to see the Draft of the Stewardship Framework for Grizzly Bear. It is encouraging to see a focus on wildlife and that grizzly bear management in British Columbia is a priority. However, we have several concerns relating to the Framework that must be addressed.

*Recognition of First Nations Rights*

The Wild Sheep Society of BC is encouraged to see that several First Nations across the province are continuing to manage predator populations. We will continue to support First Nations and their right to hunt; particularly when managing wildlife supported by science. It was noted that the Framework addresses reconciliation and addresses co-management through the Together for Wildlife Strategy- however we have yet to see significant inroads in the establishment of Regional Wildlife Advisory Committees (RWACs) and the protracted timelines for implementation of many of the concepts in this document.

*Goal and Objective Setting*

While this framework states that it does not seek to provide specific recommendations for site-specific grizzly bear challenges, the Wild Sheep Society of BC feels that the goals and objectives in this document lack specificity. Goals that are specific, measurable, achievable, relevant and have a time constraint are the expectation of the Wild Sheep Society and the broader conservation community. The framework is far too non-specific and lacks goals and timelines and we are concerned it will not achieve the desired outcomes. This must be rectified.

This framework document lacks details and courses of action specific to regions and sub-regions that are of concern. The framework omits areas where grizzly bear populations should be managed to reduce or limit impacts on other animal populations, as science dictates. There are also areas of concern relating to conflict areas primarily in rural communities.



Additionally, all wildlife populations need to have objectives set and management strategies implemented to achieve those numbers. The grizzly bear is no different.

The lack of specifics in this document shows that this serves only as an esoteric and non-binding guideline. A detailed and well-articulated commitment to civil servant accountability including actionable items is necessary.

### *Managing Grizzly Bears Based on Science*

The North American Model of Wildlife Management has been the bedrock of success for populations from whitetail deer to ducks across the continent, and this continues to be eroded based on emotionally charged campaigns.

Page 54 of the framework under 9.9 states that “In the winter of 2017, licensed grizzly bear hunting was closed in B.C. The broad closure was not specifically or directly in response to a conservation concern. Rather it was largely a reflection of many British Columbians’ ethical or moral opposition towards grizzly bear hunting.”

The decision to discontinue the licensed grizzly bear hunt was based on an online survey that was based on ethical or moral opposition from a small data set of British Columbians and respondents from outside of the province. The framework states that, “Before licensed and regulated hunting of grizzly bears was closed across B.C. in 2017, it is possible that it was a threat to grizzly bears in some areas, but given the conservative rates of harvest, that risk was very low; grizzly bears were hunted under a conservative harvest management procedure from the ‘80s to 2017, and no declines were attributed to overharvest under regulated hunting.”

It states that ‘a large number of British Columbians supported the closure’ while the government's own data from the engagement survey suggests otherwise. The public engagement survey relating to grizzly bear hunting held in 2017 resulted in less than 3,300 participants speaking out against the hunt which represents less than 0.07% of British Columbians. Given that non-residents could participate in the survey, the WSSBC is adamantly opposed to any government directive that aligns with less than 1% of the population.

Under Section 19, Measuring Progress, item 5 states, “Recover all grizzly bear populations, where it is socially desirable, such that each population is self-sustaining.” Again, we are seeing social values being utilized for wildlife management. The Society has an expectation that a science-based definition of “recovered” be established considering that grizzly bear populations are not endangered.

Uninformed, but likely well-intentioned social values are undermining wildlife management and should never have a place in replacing sound data. Emotions do not equal action. On the ground information and hard work from hunters and conservationists contribute more to wildlife every year to the tune over well over 300,000 volunteer hours than any plea to ‘save’ a species causes.



### *Managing for Biodiversity*

This framework does not address data that the impact grizzly bears can have on ungulate populations. It mentions that grizzly bears prey upon moose and caribou, but there have been studies that show the impact they have on other ungulate populations. Caribou populations are endangered, and moose populations are in decline, a trend that is a major concern for many First Nation and rural communities.

Managing the grizzly bear should not only serve to encourage the growth of the population where it needs to grow, but also control the population growth where the grizzly bears negatively impact our rural communities or other sensitive wildlife populations. Managing our wildlife populations for biodiversity cannot be overlooked.

### *Dedicated funding is not addressed*

Ultimately though, the Framework, while providing information and offering ideas, severely lacks specific goals and measurable outcomes - particularly when it comes to management objectives. There is no mention of how to implement any of the concepts in this document, and there is no recommendation on how to secure funding or how much funding would be required.

Funding mechanisms for grizzly bear management are not broached in the Framework document which is a significant concern. Having dedicated funding for grizzly bear management is important and there are no specifics on the source of funding or what funding levels should be. In Section 10, Measuring Progress, there is a reference to securing long-term funding for WildSafeBC and First Nations-led wildlife coexistence programs. While we support this, we are disappointed that securing long-term dedicated funding for grizzly bear management in BC is not a priority and was not included in Section 10 - Measuring Progress.

### *2017 Auditor General Report*

In October 2017, the Auditor General released "An Independent Audit of Grizzly Bear Management." In that report, they stated that the greatest threat to grizzly bears is not hunting, but rather, human activities that degrade grizzly bear habitat.

The report recommended the Ministry implement a grizzly bear management plan that includes clear goals and targets and the need to prioritize activities and timelines. We are concerned that we are just now receiving the Draft Framework Agreement seven years after the Auditor General's report. Additionally, the report recommended clear goals and targets that are prioritized and included timelines. Again, this Framework falls short.



*In Closing*

The Wild Sheep Society of BC thanks your Ministry on the effort and time that you have taken to create the Stewardship Framework for Grizzly Bear, and the opportunity to engage in this process. To truly respect and want abundant wildlife on the landscape, the Government of British Columbia must work with First Nations and other stakeholders to restore the science-based licensed grizzly bear hunt.

It is shown that science supports regulated and licensed grizzly bear hunting as outlined on page 23 of your Stewardship Framework. It states, 'grizzly bears being hunted under a conservative harvest management procedure from the 1980's to 2017 resulted in no decline being attributed to overharvesting due to regulated hunting.'

Prior to 2017, grizzly bears were the most studied animal in British Columbia, with the largest portion of the research coming from on-the-ground data received from hunters. Cancelling this hunt effectively ended ongoing and regular data on the very animal this was supposed to protect.

To truly recover populations, you must amend the Stewardship Framework for Grizzly Bear to reflect:

- Setting specific management goals and objectives focusing on population objectives.
- Increase the accountability to wildlife managers to work toward specific population outcomes.
- Set dedicated funding objectives for grizzly bears.
- Focus on managing grizzly bears and all wildlife on scientific principles.
- Set specific, measurable, achievable, relevant, and time-bound goals.
- Manage for biodiversity and reduce human-grizzly bear conflicts.
- Work with First Nations to reinstate a licensed grizzly bear hunt in British Columbia.

Yours in Conservation,

**Kyle Stelter**  
*Chief Executive Officer*

**Korey Green**  
*President*

CC: Mike Bernier  
[mike.bernier.MLA@leg.bc.ca](mailto:mike.bernier.MLA@leg.bc.ca)  
Shadow Minister for Forests