



**Wolf Awareness**  
Research • Education • Conservation

**Wolf Awareness Inc.**

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September 22, 2019

Attention: Premier Horgan, Minister Donaldson, Minister Heyman, Minister McKenna, Assistant Deputy Minister Milburn-Hopwood, and Mr. Darcy Peel

**RE: Proposal to expand wolf gunning to Tweedsmuir-Entiako, Hart Ranges and Itcha-Ilgachuz caribou herd ranges and paying hunters to kill cougars in Itcha-Ilgachuz range**

Dear Public Input Coordinator, Ministers, BC Premier and Mr. Peel,

We urge the BC Government to abandon the proposal to initiate a wolf kill program in the Tweedsmuir-Entiako, Hart Ranges, and Itcha-Ilgachuz caribou herd ranges (August 22nd 4-pg document “Predator Reduction for Caribou Recovery”). We additionally urge FLNRORD to abandon its proposal to pay hunters to kill cougars in the Itcha-Ilgachuz caribou range, or to engage in any form of predator reduction under the guise of caribou recovery. We maintain that we wish to see an end to tax-funded predator-kill programs underway in British Columbia.

Wolf Awareness has engaged directly with the province regarding caribou recovery as part of the Provincial Caribou Recovery Program Stakeholder Engagement process, and consequently we were very disappointed and concerned to learn that this existing proposal was not: i) shared with us directly; ii) publicized on the Caribou Recovery engagement website; nor iii) shared with the general public beyond selected members of the communities (“targeted stakeholders”) where the killing is proposed. We are ALL stakeholders in decisions such as this, yet there was no media release or effort to provide due diligence to all British Columbians regarding this plan. Despite Mr. Peel’s statements during our phone conversation Sept. 19<sup>th</sup> that this proposal falls under regulations set by the BC Wildlife Act and therefore does not require broad public engagement, this indicates your government’s serious lack of transparency regarding decisions surrounding the future of caribou, as well as wildlife communities including predators and their alternate prey in these areas. Wolves, caribou, and ecosystems are all part of a larger public trust and these management decisions reflect upon the Natural legacy of all Canadians. As such, all British Columbians should be consulted about decisions for wide-scale predator killing that are funded by tax-dollars.

Moreover, earlier this year, several in-person consultations sessions about the bilateral Section 11 Agreements for caribou recovery proved to be catastrophic failures – they incited misinformation, fear-mongering and racism in northern communities, where economics are widely dependent on extractive industry that is damaging caribou habitat and leading to these population declines. When the province abandoned these consultations, it did so promising to do better. The province broke this promise in its proposal to increase the wide-scale killing of wolves and also cougars, as well as suggesting that alternate prey like moose, elk, deer and/or wild horses will also need to be killed yet deliberately preventing fulsome public participation. What is allegedly a consultation for “targeted stakeholders” wrongly bars the public from consultation and engagement regarding the management and conservation of wildlife in this province and willfully ignores and neglects public demands that the

province commit to meaningful habitat protection and restoration and puts an end to the killing of an increasing number of species serving as scapegoats.

The proposal makes clear that ongoing destruction and disturbance of critical habitat that caribou rely on is negatively impacting not just caribou, but likely also many other species that are endemic to old-growth ecosystems. Removing at least 80% of local wolf populations is likely to impact not only caribou, but negatively affect the wolf populations themselves (both short and long-term) and have adverse impacts on various species and ecological processes. It is unacceptable that there has never been an environmental impact statement that assesses the impacts that killing hundreds of wolves repeatedly for years has on wolves, non-caribou species, or ecological processes. Conservation goals should not be species-specific, but rather promote and allow for ecological functions and diversity which may enable adaptations during this time of changing climate. Wide-scale killing of predators may increase caribou numbers short term, but this is a tunnel-visioned approach that will wreak havoc and peril for the ecosystem at large, and to the psyche of our society.

The NDP government asserts that their wolf kill program results in the “most humane method to thoroughly reduce wolf populations”, yet this is extremely deceptive as AERIAL GUNNING IS NOT CONSIDERED HUMANE by any standards. While it remains of high concern that BC has not adopted Canadian standards set by the Canadian Council on Animal Care, it is important to clarify that the AVMA Guidelines for the Euthanasia of Animals: 2013 Edition that is cited in the Sept. 22 proposal clearly state that a gunshot to the head of a captive animal can be considered humane but when it comes to aerial shooting please review the following:

*Pg. 36: A **properly placed gunshot** can cause immediate insensibility and a humane death.....For wildlife and other freely roaming animals, the **preferred target area should be the head**. It may, however, not be possible or appropriate to target the head when killing is attempted from large distances (missed shots may result in jaw fractures or other nonfatal injuries).... The appropriate firearm should be selected for the situation, with the **goal being penetration and destruction of brain tissue without emergence from the contralateral side of the head**. A gunshot to the heart or neck does not immediately render animals unconscious, but may be required when it is not possible to meet the POE's definition of euthanasia.*

*Pg. 38: Ideally, the muzzle of the firearm should be held within 1 to 2 feet of the animal's forehead and perpendicular to the skull with the intended path of the bullet roughly in the direction of the foramen magnum. This will reduce the potential for ricochet while directing the bullet toward the cerebrum, midbrain, and medulla oblongata, which will assure immediate loss of consciousness and rapid death.*

This is not possible when flying in an aircraft over uneven ground in pursuit of a running wolf. Nowhere in the cited American Veterinary Medical Association guidelines for animal euthanasia is helicopter pursuit deemed humane. Even if gunshots do result in quick deaths of these animals, for which there has been no veterinary oversight in the field nor documentation shared with us despite repeated requests, the degree of distress and panic experienced before being killed this way is unacceptable.

If the government is so determined to now assert that the aerial gunning program is humane, despite members of the Provincial Mountain Caribou Recovery Science Team conceding (pg. 6) “**There are no humane methods to directly reduce wolf numbers**” in a report prepared for the province in 2016 titled *Next Steps for Southern Mountain Caribou recovery in planning unit 3A*. We formally request that FLNRORD provide independent and expert supervision of all killing (whether it be completed by contractors or ministry staff) including video documentation. We emphasize that it is cause for concern

that you have chosen to ignore the most relevant guidelines about animal killing: the Canadian Council on Animal Care and the Canadian Veterinary Medical Association.

Furthermore, we formally request the province publicizes all evidence and evaluations (such as forecast modelling for habitat change and concurrent population viability analyses) that caribou are likely to be self-sustaining at the federally designed habitat disturbance thresholds that would be achieved through habitat protection and restoration efforts. Without this information, this proposal is reduced to one more empty promise that something—herd planning in this case--will be done for caribou later, meanwhile what is being done now is indirect killing of caribou by means of ongoing habitat disturbance and destruction; active denial of the likelihood that climax forests will not sustain future caribou populations due to unpredictable and significant impacts of climate change; and further down-ratcheting ecosystems through the unethical killing of wolves and other apex predators.

While the BC Government is making claims that the science is clear that killing wolves in the South Peace region for the previous 5 years indicates an increase in caribou numbers, it is important to point out that this has happened alongside maternal pens, feeding programs, and herds combining. We believe that the scientific rationale is highly questionable, yet even if the science were clear, we oppose killing one species to potentially help recover another on ethical grounds, especially because the situation is human-caused and the ultimate cause, habitat destruction, is ongoing.

Although caribou decline is certainly a cause for concern, we should not and cannot neglect other current environmental threats that rely on wolves and large carnivores to maintain resiliency in ecosystems, such as chronic wasting disease and climate change.

Wolves and wolf families have intrinsic value, as do all living individuals. Wildlife management and conservation practices should be ecologically and ethically sound. Wolf killing programs are neither and as such should be abandoned. We recommend an immediate end to killing of predators and alternate prey species throughout the province on ethical and ecological grounds. We ask that the Government immediately halt habitat destruction and forbid recreators to disturb caribou while herd planning is underway. This is the only acceptable response given that the proposal cites significant annual declines in caribou populations.

Finally, and importantly, we encourage the BC Government to commit to diversifying the northern economy to reduce reliance on extractive industry which continues to bring about the demise of caribou and the biodiversity they represent as indicator species. Certainly, the many millions of dollars that have already and are proposed to be spent on killing programs could be used to restore habitats and support the economic diversification required in caribou ranges.

Sincerely,



Sadie Parr - Wolf Awareness Inc. Executive Director

References:

[Serrouya, R. and B. McLellan. 2016. Next steps for Southern Mountain Caribou recovery in planning Unit 3A, the Revelstoke Shuswap Region October 12, 2016](#)

[Underwood, W., Anthony, R., Cartner, S., Corey, D., Grandin, T., Greenacre, C.B., Gwaltney-Bran, S., McCrackin, M.A., Meyer, R. and Miller, D., 2013. AVMA guidelines for the euthanasia of animals: 2013 edition. Schaumburg, IL: American Veterinary Medical Association.](#)