

December 1st, 2020

Katrine Conroy, Minister of Forests, Lands, Natural Resource Operations and Rural Development,

George Heyman, Minister of Environment and Climate Change Strategy,

Nathan Cullen, Minister of State for Lands and Natural Resources, and

Premier John Horgan

Re: Stop Killing Wolves and Protect Habitat: Save BC's Caribou from Extinction

Dear Ministers and Premier,

Research recently published in the journal *Biodiversity and Conservation* found that wolf kill programs in British Columbia (and Alberta) cannot be shown to provide the presumed benefit for reversing the decline of endangered caribou¹ and are based, at best, on guesswork. Habitat loss, not wolves, is driving caribou to extinction. Killing wolves is a cruel distraction.

Since the 1970's, successive BC governments have ignored science and continued to waste time and money on the failed and misguided strategy of scapegoating wolves. It has been clear for decades that caribou are being driven to extinction by destructive human activities. Logging and other extractive industries damage and destroy critical habitat and snowmobiling, ATV's and heli-skiing harass already stressed herds. As a result, caribou generally and particularly BC's unique deep-snow dwelling mountain caribou have declined sharply over recent years.

Questions about cruelty also must be answered. More than 1,000 wolves in BC have died agonizing deaths through aerial gunning since 2015. Contractors hired by government to shoot wolves from helicopters are typically self-supervised and this killing method often entails extreme anxiety, pain and suffering prior to death, failing to ensure that wolves are killed humanely. In addition to these and other ethical concerns, wolf kill programs incur high environmental and economic costs and degrade ecosystems. Wolves play important roles in sustaining biological diversity and important ecological functions.

While we the undersigned acknowledge with respect that the BC government, the Salteaux and West Moberly First Nations and Canada have undertaken a recovery program for a few herds in N.E. BC we are concerned about the plan's reliance on wolf killing and maternal penning, neither of which provides the long-term benefit of habitat protection. Moreover, there are 54 herds in BC requiring protection and anything less than a province-wide recovery strategy will be a conservation failure.

¹ Harding, L.E., M. Bourbonnais, A.T. Cook, T. Spribille, V. Wagner and C.T. Darimont. No statistical support for wolf control and maternal penning as conservation measures for endangered mountain caribou. *Biodivers Conserv* (2020).

BC needs to expand caribou habitat protection without delay and must start to manage caribou as a priority not subordinated to economic and political considerations. The province's current approach of managing for the minimal needs of declining populations condemns caribou to remaining perpetually at-risk instead of recovered and self-sustaining. It also undermines BC's climate and biodiversity commitments and obligations to First Nations.

Therefore, we call on the government of BC to immediately heed the advice of the BC Forest Practices Board, caribou scientists and conservation groups to:

1. Suspend triage management and urgently create and implement a province-wide caribou recovery plan with specific range plans for each herd. Each plan must provide sufficient high quality habitat for self-sustaining populations.
2. Provide immediate, effective legal protection (non-reversible) for all remaining caribou habitat (especially high and medium capability) to ensure a minimum of 65% undisturbed habitat remains within each range as required by Canada's Species at Risk Act².

Habitat protection must include a moratorium on new recreation, exploration and extraction tenures in critical caribou habitat and a quick phasing out of existing tenures in habitat essential for recovery of self-sustaining herds.

3. End all wolf and predator kill programs under the guise of caribou recovery.
4. Undertake herd augmentation for declining and recently extirpated herds.
5. Eliminate recreational hunting of caribou across BC immediately.
6. Exclude disruptive recreational activities from critical habitat notably snowmobiling, ATV use and heli-skiing.
7. Develop an economic diversification plan to help resource dependent communities reduce dependency on economic activity harmful to caribou.
8. Include environmental leaders and First Nations in all decision-making, abandoning the practice of providing preferential involvement to stakeholders motivated by economic interest. The current approach undermines objective, science based decision-making and necessary cooperation.
9. Enact species at risk legislation which BC lacks, and the current government promised as it took office in 2017.

We call upon Ministers Conroy, Heyman, and Cullen and Premier Horgan to give priority to the substantial scientific evidence that habitat protection and restoration are critical to

² Environment and Climate Change Canada. 2016. Range Plan Guidance for Woodland Caribou, Boreal Population. Species at Risk Act: Policies and Guidelines Series. Environment and Climate Change Canada, Ottawa. 26 p.

restoring self-sustaining caribou herds and to discontinue policies that rely on killing wolves.

Sincerely,

Alpha Wildlife Research & Management Ltd.
Gilbert Proulx, Director of Science

Animal Alliance of Canada
Liz White, Director

Animal Justice Canada
Camille Labchuk, Executive Director

Animal Protection Party of Canada
Liz White, Leader

BC SPCA
Sara Dubois, Chief Scientific Officer, PhD, RPBio, Director Science & Policy

Robert Bateman, Naturalist and artist

Bears Matter, Barb Murray, Director

Michael Bloomfield, caribou biologist
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Coyote Watch Canada
Lesley Sampson, Founding Executive Director

Earthroots
Hannah Barron, Director, Wildlife Conservation Campaigns

EXPOSED Wildlife Conservancy
John Marriott, Co-founder and Director

The Fur-Bearers
Lesley Fox, Executive Director

Humane Society International/Canada
Rebecca Aldworth, Executive Director

International Fund for Animal Welfare (IFAW) Canada
Sheryl Fink, Director, Wildlife Campaigns

McCrorry Wildlife Services Ltd
Wayne P. McCrorry, RPBio.

Northern Lights Wolf Centre
Shelley and Casey Black, Co-founders

Pacific Wild Alliance,
Ian and Karen McAllister, Co-founders

Berney Pukay D.V.M.
Canadian Veterinary Medical Association Honorary Life Director

Save-The-Cedar League
Dr. Rick and Julie Zammuto

Valhalla Wilderness Society
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Wolf Awareness Inc.
Sadie Parr, Executive Director

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