



June 15, 2020

Honourable Doug Donaldson
Minister of Forests Lands and Natural
Resource Operations and Rural Development
PO Box 9049, Stn Prov Govt
Victoria, BC V8W 9E2
Via email: flnr.minister@gov.bc.ca

Dear Minister Donaldson,

RE: CARIBOU RECOVERY AND PRIMARY PREY REDUCTION PROGRAM FOR MOOSE

BC Interior SCI advocates for, and supports, scientific management practices needed to protect our biological diversity in British Columbia. Further, we agree that special considerations are required for our threatened caribou herds.

Primary Prey Reduction Programs (PPRP), by definition, is the planned reduction of primary prey species herd numbers in an effort to reduce predator populations. The theory is that by reducing primary prey species such as moose, it will limit the secondary predations on species such as caribou. The reduced population of a species like moose would then also contribute to a decline in predator population. However, science has indicated that PPRP can only be successful **when combined with an annual predator reduction program.**

We agree in principle with the May 11, 2020 letter authored by the British Columbia Wildlife Federation (BCWF) and the Guide Outfitters of British Columbia (GOABC) that promotes proven science-based management strategies within ALL regions and wildlife management units (WMU) in British Columbia. We also agree with BCWF and GOABC, that implementing a stand-alone PPRP as a holistic management strategy for the protection of caribou has a high-rate for failure if the Government has not committed to an annual predator-reduction program **in conjunction with** taking a serious look at developing a habitat rehabilitation plan. To reiterate, we **do not support** a PPRP as a stand-alone management strategy.

We do also express concerns in the areas that do not seem to overlap with caribou habitat where moose cow/calf LEH permits have increased. Based on personal communications (third-party), it is our understanding that the Province has issued these LEH permits for moose populations control measures. Hunting is an excellent tool for



managing herd surplus. However, we fully agree with other conservation organizations in this province that our ungulate populations in British Columbia are at a historic low. Urban encroachment and industry development have severely altered the landscape, thereby fragmenting and degrading the habitat. This development has also tipped the scales in favour of predators. As a result of the above stated, BC Interior SCI **will only support** LEH permit increases in areas that have clear management objectives such as caribou protection and/or to control populations due to herd surplus. Based on feedback from our membership, other conservation organizations and non-government biologists we do find it **highly unlikely** that in the current conditions we are dealing with moose populations that exceed the carrying-capacity of the land base.

Wildlife management in British Columbia has been underfunded, mismanaged, and designated as a low political priority for decades; as a result, public trust has severely eroded. The decline of caribou herds and the existing situation with our ungulate populations is a testament to this statement. In addition, the Province of British Columbia has employed reactive management versus proactive; this contributes to often executing management strategies when it is too late, such as the PRRP for caribou. Finally, there has been a severe shift in the past 10-years of social policy being the driving force behind wildlife management versus the legislated science-based approaches. The grizzly bear hunting ban is a prime example of this. SCI **does not support** blanket management; it is imperative that we manage minimally from a regional level but prefer down to the wildlife management unit. Obviously, cost is a factor here. We encourage our Government to utilize **ALL** revenue raised in British Columbia pertaining to hunting to be reinvested, in addition to looking at revenue raising ventures such as the United State's *Pittman-Robertson Act* and *Dingle-Johnson Act*.

We applaud our membership and the British Columbia hunting community for standing up, asking questions, and holding our government accountable as we seek information to justify decisions such as these. The British Columbia Government's accountability, transparency and openness to the hunting community has been dismal. We have a right, as citizens of British Columbia, to expect our government to provide clear objectives for each wildlife management strategy employed, especially in times when our wildlife populations are in decline.

BC Interior SCI believes that government needs to **FULLY COMMIT AND FUND** holistic, science-based wildlife management.

Sincerely,

Robin Unrau, President
Hunters for BC – Interior Chapter SCI