



BRITISH COLUMBIA CATTLEMEN'S ASSOCIATION

Representing the Beef Cattle Industry of British Columbia

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Hon. Nathan Cullen
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BCCA File: 2023-038

SENT BY EMAIL

Dear Honourable Ministers:

RE: BC Cattlemen's Comments on the Grizzly Bear Stewardship Framework

Thank you for the opportunity to provide comments on the draft grizzly bear stewardship framework. The Association has reviewed the draft framework and have submitted comments through the online portal. In our view, the online questionnaire was a challenging way to express our feedback and therefore are submitting this letter to summarize our requests for changes/action.

Calls to Action

1. **Remove Unconscious Bias:**

The current approach is not effective. Decisions on grizzly population and habitat management have unconscious urban bias toward conservation without appropriate consideration of impacts of decisions on rural and remote communities, primarily the agricultural community. Remove unconscious bias toward conservation and a moratorium on hunting. Monitor and mitigate for unconscious bias that has an urban influence on the framework. For example, agriculture is listed as a threat but fails to acknowledge that many agricultural croplands provide habitat, a food source, and refuge. The framework also fails to acknowledge the population increases that many agricultural areas are experiencing and what might be driving those increases.

2. **Population Assessment:**

Improve the accuracy of population assessments. Seek local population knowledge from the local agricultural community. More details and transparency is needed to explain the population estimates being used for various Grizzly Bear Population Units (GBPU). Explanations about how the individual GBPU population estimates are derived are needed. You can only manage what you monitor. Current data on inventories including accurate mortality rates is crucial to species management.

3. **Prioritize Human Safety:**

Prioritize human and livestock safety (self-defence) without penalty. Remove penalties for self-reporting regardless of timing of reporting the incident. Fines discourage reporting, even in unavoidable situations and erode the trust between rural landowners and COS.

4. **Establish a 3-Strikes Policy for Habituated/Aggressive Bears:**

BCCA has met with the Minister of Environment and the COS to recommend the Province establish a three-strikes policy for habituated and/or aggressive bears. This type of policy would provide rural landowners with the ability to take justified lethal action after three aggressive incidents (three strikes) have occurred.

5. **Include Agriculture in Local Planning:**

Ensure that local planning processes engage with agricultural stakeholders and involve individuals who have knowledge and experience (regardless of academic or professional titles).

6. **Flexibility:**

Avoid a "one size fits all" approach to stewardship. BCCA supports local planning featuring local solutions.

7. **Strengthen Protections for Agriculture:**

Retain Sec 26(2) of the Wildlife Act (and its attendant regulations) that relate to the protection of livestock when wildlife is a menace to domestic animals that are on private land.

8. **Cumulative Impacts of Overregulation on Agriculture:**
Consider the impacts of legislation, regulation and policies on agriculture and food security. Ensure agricultural compensation programs 100% compensate for grizzly bear damage where menacing bears are impacting agriculture and hunting moratoriums are in place.
9. **Citizen Science Data from Agriculture:**
Seek out population information that incorporates local knowledge from farmers and ranchers; many of whom have been in the region for generations. Include historical information passed down from previous generations. Many agricultural producers document the wildlife presence, numbers and movement patterns on a daily basis as part of their regular ranch operation. This is valuable citizen-science information that should be sought out during population assessments to improve the accuracy of the information for planning purposes.
10. **Hunting:**
Re-instate a science-based hunt, where populations are stable and can sustain the hunting harvest.
11. **Mitigate Bear Impacts:**
Acknowledge that bear caused conflicts are a downside of having an abundance of bears on the landscape. Bears impact other species (caribou and moose calves). Ongoing management will require significant funding for population assessments, funding for bear management strategies specific to agriculture (bear safe infrastructure for agriculture, bear proof fencing, etc.)
12. **Stewardship Recognition:**
There is a missed opportunity for the province to acknowledge ranchers and farmers for the management of their private pastures and crop lands that are a source of refuge, habitat, and high-quality food sources. Corn crops were acknowledged in the document; yet there are many more sources of feed and habitat provided by agricultural lands. In addition to corn, the grain and cereal crops such as barley, oats, etc. are a substantial part of the grizzly diet. Unfortunately, there are also livestock losses due to grizzly presence on ranches. This framework is an opportunity to recognize BC ranchers and farmers for their stewardship of private lands that provide benefit to grizzly bears.
13. **Bear Conflicts:**
This document could recognize the effects of grizzly conflicts with agricultural farms and ranches. Agriculture is also facing cumulative impacts from wildlife depredation and predation on our crops and livestock. First and foremost is the concern that many ranchers in rural and remote locations have about threats to the safety of their children, family and workers. Grizzly bears are being encountered in fields, pastures and range on a more frequent bases than ever before. The bears are also being seen where they never were before. Ranchers understand that we must do our part in reducing attractants on the ranch. It is essential that the safety of our producers, their families, their employees and livestock be held in the highest regard.
14. **Retain Sec 26 (2) of the Wildlife Act:**
It is imperative that the province retain Section 26(2) in the *Wildlife Act* (and its attendant regulations that relate to the protection of livestock when wildlife is a menace to domestic animals that are on private land.
15. **Accountability:**
Establish a process to review/amend management decisions based on agriculture-conflict and impact data. Consider the impacts of legislation, regulation and policies on agriculture and food security. Ensure agricultural compensation programs 100% compensate for grizzly bear damage where hunting moratoriums are in place.

In summary, BCCA believes that stewardship and bear management are necessary. Representatives from the Association would be pleased to meet and discuss our recommendations at your convenience.

Regards,



Brian Thomas, President
BC Cattlemen's Association