

July 14, 2007

To: Honourable Barry Penner

Cc.: Premier Gordon Campbell, Carole James, Shane Simpson

From: Peter Hamilton, Lifeforce Foundation

Re: Changes to BC Wildlife Act

On behalf of the Lifeforce Foundation, I urge your government to take more time to review changes to the BC Wildlife Act. I urge you to contact concern animal protection organizations and to allow the public more time to comment. Most of the public is not aware of the proposals and, perhaps, a government mailing to all BC homes is necessary. Many sectors of our society should be heard from and proposals should reflect current attitudes and values of all British Columbians. The general public is not aware of the proposals and would certainly not support treating wildlife as commodities and promoting hunting and the killing of wildlife.

BC Wildlife attracts millions of people and dollars to Supernatural BC. These magnificent creatures are worth more alive and free than killed.

Some of our concerns are as follows:

1. At present the Discussion Paper and the "Hunter Recruitment and Retention Report" are heavily biased toward vested interests such as the hunting/trapping/guide outfitters lobby.

The Ministry should not have a mandate to set a goal of "recruiting" 20,000 hunters in BC over the next decade and to do so by streamlining regulations across the province along with many other proposals found in the "Hunter Recruitment-Retention Report". "The 2006/07 - 2008/09 Service Plan for the Ministry of Environment lists sustainable use of environmental resources, optimized public and commercial opportunities from wildlife and providing outstanding hunting among its goals and objectives." The plan goes on to set a performance measure of increasing the number of basic resident hunting licenses sold annually by 2014/15.

Your purpose should not be to make hunting cheaper, less restrictive and to promote it as being a quality "cool" experience. In this day and age, with changed public attitudes that respect and protect wildlife, your government should not be promoting killing wildlife. The decrease in hunting proves that there has been a change in public attitude. Wildlife is not here to be killed for entertainment to hunt and to "harvest".

2. There should be a prohibition on ownership, breeding and selling exotic animals. This would include all non-indigenous species such as lions, tigers, monkeys, alligators and so on. The exotic animal business results in cruelty and abuse to the animals and public safety threats.

Zoos and aquariums should be sanctuaries for animals presently in captivity not entertainment places. They must meet international standards and be licensed in order to keep exotic and BC wildlife. They must create non-public sanctuaries and not breed/sell the animals.

Game farm permits to private individuals must not allow exotic species. The exotic animal market must end.

3. Rescued and rehabilitated wildlife, birds, raptors must not be given to members of the public or used commercially in animal performances or in aquariums/zoos

Individual animals that are not releasable must be provided with the social and behavioral needs related to that species and housed in a non-public sanctuary. For example, lone animals must have companionship of another of his/her species if they would have if living in the wild.

4. Wildlife/Human Interactions

a) You must not modify the hunting license system to facilitate hunting on agricultural lands to control problem wildlife because it would amount to unregulated hunting.

It should not be up to the farmer or rancher or their friends to decide what is a nuisance animal. Mitigation methods are possible. For example, I have recommended "feed stations" in poor crop years to divert wildlife away from human conflicts.

b) You must not allow trappers and hunters to respond to wildlife conflicts to assess conflicts and kill/capture wildlife. This would transfer responsibility to people who have the sole purpose of killing wildlife for financial profits. And further, who is going to assess their level of expertise in the field of assessing non-lethal controls?

5. Under Possession of Live Wildlife:

a) You discuss the need to amend the Act to fill any existing legislative gaps relating to the humane treatment of captive wildlife. As stated above individuals must not own any exotic and BC wildlife. Any present zoo and sanctuary must comply with international standards. People working at those facilities must be trained, certified and licensed. If they do not comply they must be closed.

b) You made reference to captive-bred wildlife in the definition of "wildlife" that should be in the Act. What species are you talking about? In general, there should be a phase out of species that are captive bred.

6. Zoos:

As I stated, any zoo and aquarium must be licensed. They must be international standards and operated by trained, certified and licensed people. BC wildlife must not be sent to other countries because the facility and care cannot be determined and monitored for humane treatment.

The social and behavioural needs of the species must be provided for. For many species this is not possible and they should not be kept in captivity.

7. Wildlife Rehabilitators:

Provisions in the Act to permit the establishment of a licensing system for new rehabilitators should be allowed. Rehabbers must not be allowed to publicly display or take wildlife to public/private events.

Rehabilitated wildlife that is deemed non-releasable must not be provided to private entrepreneurs and/or zoos/aquariums.

Wildlife must not be treated like pets and captivity/public exhibition can lead to others wanting "wildlife" as pets.

8. Ownership of Dead Animals or parts

a) There should be stronger controls and penalties for illegal taking and trafficking in wildlife and wildlife parts. In order to do this the government should hire more Conservation Officers so adequate enforcement can be practiced.

b) The ownership of dead wildlife caught by trappers as nuisance animals and those protecting their property must not be allowed.

Who would decide if the animal killed was a nuisance animal/threat to property? And would sales be prohibited? This would open the door to more killing and marketing of BC wildlife.

9. Management of Recreational Use of Wildlife

a) The "use of wildlife" or the "harvesting" of wildlife as if they are simply plant crops is offensive to the animals and those who respect wildlife. The Ministry's Hunter Recruitment and Retention Project should be stopped because it should not be the mandate of the government to "recruit" hunters. The role of government must be as the guardians of the wildlife to protect them for present and future generations – alive not dead.

b) The ministry must abandon their target to increase the numbers of hunters by 20,000 over the next 10 years. If the government proceeds down this road it will have a negative impact on tourist when boycotts exposing the hypocrisy are implemented.

c) You discuss "quality hunting opportunities and being responsive to changing social norms" What is your definition of "quality hunting"? This appears to be against changing social standards against killing wildlife as sport for trophies and so on.

d) You mention that limited entry hunting also leads to better hunter distribution and better selection of animals of specific age and sex. Please clarify this statement.

e) What do you mean to amend the act and regulations so that they reflect new methods of hunting and new hunting tools? Are you making it easier to kill instead of protecting them? What new methods are you promoting?

f) What do you mean to clarify the limited exceptions that might apply to all forms of wildlife harassment? What are the present limited exceptions? Are you permitting some wildlife harassment?

g) You must not modify the hunting licensing system for junior hunters. A 10-years-old child is far too young to be given a gun to kill an animal. Are these kids making their own choice or being manipulated from parents/relatives? What psychological harm is done to a child who is forced to kill? This is promoting violence and violence towards animals leads to violence towards people.

h) Do not lower the price of species licenses. There should not be a sales price on killing these beautiful creatures. The costs are not why there is a decrease in hunting it is the change of public attitude towards killing animals. Many rather hunt with a camera not a gun.

i) You must guarantee that one-time-only hunters must take the CORE exam. Everyone must be properly trained for public safety and to try to kill the animal instantly without prolong suffering.

j) There should not be any special open seasons for people under 19 so they can kill mule deer and white-tailed deer. Why and who is promoting this?

k) There should not be any successful limited entry hunting applicant who can share his hunt with a partner. What exactly does this mean?

l) How would you propose to simplify regulations where feasible in order to achieve greater standardization of hunting requirement in different regions of the Province?

10. Management of Commercial Use of Wildlife:

a) You state that organizations representing operators want more involvement in the regulation of their members, including assuming some roles and responsibilities that have traditionally belonged to government. This could include: providing training and testing for new commercial

operators; issuing licenses and establishing standards of practice, codes of ethics and other expectations.

Self-policing does not work! The government must maintain responsibility and not privatized any "Wildlife for kill" industry. In fact, the government should work towards phasing out these businesses that can find alternatives.

11. Guide Outfitters

a) The Ministry should amend allocated quota to respond to new scientific data about conservation concerns. Will this put an end to all bear hunting? We hope so. The spring bear hunt is inhumane – hunters do shoot moms and there are orphaned cubs.

b) You propose to allow guides to provide and adhere to an operating plan for a specified period so they could move away from prescriptive regulation and towards an outcome-based model. What exactly is this and what is the benefit to wildlife?

12. Fur Traders

There should not be any change in administrative requirements for exporting so that fur-traders can export using their licence number without the need for separate individual export permits. The fur trade is decreasing and plans should be for a total phase out of this barbaric industry. For example, there has been a substantial decrease in the number of fur farms. I believe it has decreased from approximately 100 to 21 since 1980s. Most of the present ones are 'hobbyists'.

13. Wildlife Viewing

How do you propose to extract a surcharge on wildlife viewing?

I would agree because this puts a positive value on keeping animals alive and protected. However it must be done in a responsible manner because many ecotours, for example with orcas, do harass them and interrupts their lifestyles. So your proposal to establish provisions to manage high-value areas for wildlife viewing must be carefully planned. Organizations, such as Lifeforce should be consulted.

14. Taxidermists and Exporters

a) You should not provide for a taxidermist licensing system that allows them to export without the need for specific export permits and detailed records concerning ownership of all wildlife. This promotes trophy hunting and other threats to wildlife. You must keep strict controls in order to avoid poaching of animals.

b) You should not allow ownership of animal remains involved in wildlife/human conflicts and vehicle collisions to be sold to the public. You will just open up the door for illegal hunting that will be passed off as unavoidable conflicts

c) You should not expand the circumstances in which ownership of dead wildlife and parts of wildlife worth over \$200 can be transferred from the government to an individual. This could promote disrespect for wildlife. You also do not have the staff to assure that the animals are legally killed.

In Conclusion

The province of British Columbia has been at the forefront of the ecology movement to protect animals and the environment for all to enjoy. From Vancouver creating the first Animal Rights Day in the world to BC bans on performing animal acts to stopping some rodeo acts; our society is evolving towards a more compassionate place for all life.

The proposals in this Wildlife Act is a step back into the dark ages when people killed for their amusement. And it is no longer necessary to kill them for food since many people are choosing

healthy alternatives such as vegetarian foods.. It is time to stop all forms of violence and that includes violence towards animals.

The BC government must move away from the Tony Brummet days when he was given an American Sportsman Award for helping American trophy hunters. The BC government also changed laws to protect hunters from those who protest to protect wildlife.

The majority of people are pro-nature not pro-killing. Tourists flock to BC to enjoy wildlife living freely in their pristine habitats. They don't come to see stuffed animals in a museum or a bear rug in their hotel room. Most British Columbians appreciate the marvels of our wildlife paradise and would be shocked at these government plans. I hope anti-wildlife organizations and staff will not manipulate you. I hope you will value life instead death.

Is the BC Wildlife Act supposed to protect wildlife or should it be called the BC Hunting Act to profit from killing animals? The BC government must not promote violence by brainwashing children, women and others into thinking that hunting vulnerable animals is cool. Violence towards animals can lead to violence against people. We must promote a compassionate society that will respect and enjoy wildlife alive - not dead.

If you have any questions feel free to contact us. Lifeforce looks forward to your response.

Thank you.