



**Pacific Wild**  
1529 Amelia Street  
Victoria, British Columbia V8W 2K1  
250-380-0547 / [www.pacificwild.org](http://www.pacificwild.org)

Legislative Assembly of British Columbia  
Special Committee on Reforming the Police Act  
c/o Parliamentary Committees Office  
Room 224, Parliament Buildings  
Victoria, BC V8V 1X4  
Canada

Via e-mail: [Policeactreform@leg.bc.ca](mailto:Policeactreform@leg.bc.ca)

**April 28<sup>th</sup> 2021**

Re: Submission of Pacific Wild Alliance, CANADA

Pacific Wild Alliance is a registered Canadian environmental charity, located in British Columbia. We have over 200,000 supporters. We respectfully make this submission for your review and consideration with a specific focus on the BC Conservation Officer Service's role as a law enforcement service provider in British Columbia.

According to our records, for over a decade, our organization has heard complaints from members of the public and our own supporters about state-sanctioned killings within their communities. Most notably, the BC Conservation Officer Service's killing of black bears, grizzly bears, and cougars. Other matters pertaining to the BC Conservation Officer Service's dealings with members of the public have also been raised.

Following various public flashpoints involving high profile bear killings, and the false arrests of citizens in Port Coquitlam in 2019, Pacific Wild retained Dr. Bryce J. Casavant in 2020 as a policy analyst to correspond directly with the responsible minister for the BC Conservation Officer Service on our behalf.

Attached as Appendix A to this letter are the letters to the responsible minister, the ministry's reply, and our subsequent rebuttal. The ministry did not respond to Pacific Wild further.

Our concern remains the accountability of environmental law enforcement services in British Columbia. As you will read in our correspondence with the responsible minister, hundreds of rounds of service ammunition are discharged by provincial constables from their service weapons every year. Yet, there is no mechanism for independent civilian oversight of the use of these issued weapons.

The unchecked use of lethal force on our wildlife, with issued service weapons, often creates community flashpoints in urban areas. In recent times, there have been at least three instances of officers publicly and falsely accusing members of the public of illegal actions within the media, only to be corrected at a later date after citizens suffer serious reputational harm. In one high profile instance, an officer is reported to have pulled a senior citizen from his own porch steps during an attempt to kill a mother bear and her cubs (which was done).

As evidenced by situations like this, it is clear that there can be overlap between a conservation officer's wildlife killing actions and subsequent treatment of human citizens. Often, a conservation officer's job takes place in the woods, or other areas of the urban interface environment where their actions are not seen by members of the public. And when members of the public are present, and conflict arises, it becomes the officer's word against theirs, with no forum for the member of the public to approach an independent party for post incident review.

For this reason, Pacific Wild has previously called on the minister to deploy body cameras to its constables serving as conservation officers. Although the ministry stated publicly that it would consider issuing body cameras to its officers, they have not corresponded further with our organization on this point.

Recommendation:

We strongly recommend that this committee does not leave the BC Conservation Officer Service unreviewed. Rather, we suggest that this committee considers making a recommendation that, if the BC Conservation Officer Service wishes to continue with a policing and public safety mandate in British Columbia, then it must be designated as a police agency and held to the same standards as other police forces in the province. We respectfully suggest that the ministry of Environment and Climate Change Strategy may not be the correct ministry to house the BC Conservation Officer Service as it lacks experience with policing operations and law enforcement leadership within its executive branch.

Respectfully submitted for your consideration,



Karen McAllister  
Conservation Director  
Pacific Wild Alliance



Dead wrong:  
An open letter to the Minister of Environment and Climate Change Strategy

Honourable George Heyman  
Minister of Environment and Climate Change Strategy  
PO Box 9047 Stn Prov Gov  
Victoria, BC V8W 9E2

Via e-mail [ENV.Minister@gov.bc.ca](mailto:ENV.Minister@gov.bc.ca)

January 1<sup>st</sup> 2020

Re: December 20<sup>th</sup> 2019 ministerial press release.

Dear Minister,

### Introduction

1. The B.C. Conservation Officer Service (BCCOS), in the last 8 years, has killed **4,341** black bears, **162** grizzly bears, and **780** cougars, with 542 black bears killed (2019) and 26 grizzly bears killed (2019) – a historically significant number of kills.
2. Pacific Wild is a registered Canadian charity located in British Columbia (B.C.) with a focus on environmental and wildlife conservation. Our organization has tens of thousands of supporters within B.C. and abroad.
3. Recently, many of our supporters, as well as, multiple other charities and members of the public, have expressed concern to your office and the B.C. Conservation Officer Service about the current killing practices of officers. In response to these concerns, a provincial news release was issued with direct quotes from yourself as the responsible minister. It is these quotes, coupled with current kill statistics, that cause concern amongst our organization and many of our supporters.
4. Pacific Wild is of the opinion that an open letter response to you is appropriate because of the public nature of the comments from yourself and due to widespread media coverage of the government news release.
5. This letter will first describe the overarching issue followed by a compiled death toll of wildlife killed by the BCCOS in the last 8 years. Next, a brief background of

Dead wrong

the BCCOS is provided. This background is followed by two issues pertaining to your comments as minister. Finally, concluding recommendations/comments will be made. These recommendations call on you, as the responsible minister, to take certain actions.

## Issue

6. A recent provincial news release dated December 29<sup>th</sup> 2019 and titled *Bear attractant audits aim to reduce human-wildlife conflicts* contained quoted comments from yourself (in your capacity as Minister of Environment and Climate Change Strategy). You were quoted as stating:

...Not a single conservation officer relishes the thought of having to put down an animal, which is always a last resort for public safety...

7. As a preliminary matter, it is important for you to be aware that Freedom of Information Requests made in early 2019 resulted in a finding that B.C. Conservation Officers were killing bears but not taking enforcement actions for offending parties. Following this finding, there was media coverage of the issue. The BCCOS responded by producing an operational plan for attractant audits. Pacific Wild notes the December 20<sup>th</sup> 2019 press release focuses on the attractant audits but does not mention or review the number of bears killed by Conservation Officers.
8. The question is raised, “how effective was the attractant audit if officers were simultaneously setting a historically high number of kills?” The implementation of the audit and its genuine intentions and legitimacy are in question when enforcement actions are compared against kill statistics. For this reason, accuracy of information being provided to you (in your capacity as Minister) is the theme of this open letter.

## Current death toll (2011 – December 2019)

| Black bears destroyed by the COS  |            |            |            |            |            |            |            |            |            |             |
|---|------------|------------|------------|------------|------------|------------|------------|------------|------------|-------------|
| Month   | 2011-2012  | 2012-2013  | 2013-2014  | 2014-2015  | 2015-2016  | 2016-2017  | 2017-2018  | 2018-2019  | 2019-2020  |             |
| Apr   | 3          | 5          | 9          | 13         | 21         | 18         | 7          | 12         | 16         | 104         |
| May   | 26         | 41         | 52         | 68         | 67         | 43         | 99         | 54         | 97         | 547         |
| Jun   | 96         | 60         | 40         | 73         | 32         | 35         | 86         | 61         | 81         | 564         |
| Jul   | 89         | 52         | 29         | 62         | 12         | 12         | 64         | 32         | 55         | 407         |
| Aug   | 91         | 59         | 24         | 70         | 58         | 64         | 43         | 13         | 67         | 489         |
| Sept  | 127        | 107        | 96         | 119        | 179        | 171        | 82         | 95         | 95         | 1071        |
| Oct   | 53         | 79         | 88         | 70         | 116        | 87         | 60         | 59         | 101        | 713         |
| Nov   | 33         | 26         | 28         | 14         | 29         | 43         | 32         | 26         | 30         | 261         |
| Dec   | 6          | 10         | 9          | 5          | 22         | 11         | 2          | 6          | n/a        | 71          |
| Jan   | 4          | 0          | 3          | 6          | 10         | 6          | 5          | 6          | n/a        | 40          |
| Feb   | 2          | 2          | 5          | 1          | 6          | 3          | 4          | 7          | n/a        | 30          |
| Mar   | 3          | 2          | 6          | 6          | 12         | 4          | 3          | 8          | n/a        | 44          |
| <b>Total</b>  | <b>533</b> | <b>443</b> | <b>389</b> | <b>507</b> | <b>564</b> | <b>497</b> | <b>487</b> | <b>379</b> | <b>542</b> | <b>4341</b> |
| Average number of bears killed per year:  |            | 482        |            |            |            |            |            |            |            |             |
| Source: <a href="https://www2.gov.bc.ca/assets/gov/environment/plants-animals-and-ecosystems/conservation-officer-service/predatorstatisticsblackbear.pdf">https://www2.gov.bc.ca/assets/gov/environment/plants-animals-and-ecosystems/conservation-officer-service/predatorstatisticsblackbear.pdf</a> |            |            |            |            |            |            |            |            |            |             |
| Accessed December 28, 2019  |            |            |            |            |            |            |            |            |            |             |
| Dec 2019 - March 2020 not available/published yet   |            |            |            |            |            |            |            |            |            |             |

## Dead wrong

| Grizzly bears destroyed by the COS  |           |           |           |           |           |           |           |           |           |            |
|---|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|------------|
| Month   | 2011-2012 | 2012-2013 | 2013-2014 | 2014-2015 | 2015-2016 | 2016-2017 | 2017-2018 | 2018-2019 | 2019-2020 |            |
| Apr   | 0         | 1         | 1         | 0         | 1         | 1         | 0         | 0         | 0         | 4          |
| May   | 0         | 5         | 2         | 0         | 0         | 1         | 3         | 1         | 3         | 15         |
| Jun   | 2         | 2         | 2         | 0         | 2         | 2         | 6         | 3         | 10        | 29         |
| Jul   | 1         | 8         | 1         | 3         | 1         | 0         | 1         | 5         | 5         | 25         |
| Aug   | 2         | 4         | 0         | 3         | 3         | 0         | 1         | 4         | 1         | 18         |
| Sept  | 6         | 3         | 2         | 5         | 3         | 0         | 2         | 0         | 0         | 21         |
| Oct   | 3         | 5         | 2         | 2         | 0         | 2         | 4         | 6         | 3         | 27         |
| Nov   | 0         | 4         | 2         | 0         | 1         | 1         | 0         | 6         | 6         | 20         |
| Dec   | 0         | 0         | 0         | 0         | 0         | 0         | 0         | 1         | n/a       | 1          |
| Jan   | 0         | 0         | 0         | 0         | 0         | 0         | 0         | 0         | n/a       | 0          |
| Feb   | 0         | 0         | 0         | 0         | 0         | 0         | 0         | 0         | n/a       | 0          |
| Mar   | 0         | 0         | 0         | 1         | 0         | 0         | 1         | 0         | n/a       | 2          |
| <b>Total</b>  | <b>14</b> | <b>32</b> | <b>12</b> | <b>14</b> | <b>11</b> | <b>7</b>  | <b>18</b> | <b>26</b> | <b>28</b> | <b>162</b> |
| Average number of grizzly bears killed per year: 18   |           |           |           |           |           |           |           |           |           |            |
| Source: <a href="https://www2.gov.bc.ca/assets/gov/environment/plants-animals-and-ecosystems/conservation-officer-service/predatorstatisticsgrizzlybear.pdf">https://www2.gov.bc.ca/assets/gov/environment/plants-animals-and-ecosystems/conservation-officer-service/predatorstatisticsgrizzlybear.pdf</a> |           |           |           |           |           |           |           |           |           |            |
| Accessed December 28, 2019  |           |           |           |           |           |           |           |           |           |            |
| Dec 2019 - March 2020 not available/published yet   |           |           |           |           |           |           |           |           |           |            |

| Cougars destroyed by the COS  |           |           |            |           |           |           |           |            |           |            |
|---|-----------|-----------|------------|-----------|-----------|-----------|-----------|------------|-----------|------------|
| Month   | 2011-2012 | 2012-2013 | 2013-2014  | 2014-2015 | 2015-2016 | 2016-2017 | 2017-2018 | 2018-2019  | 2019-2020 |            |
| Apr   | 3         | 4         | 13         | 6         | 4         | 2         | n/a       | 3          | 6         | 41         |
| May   | 1         | 5         | 17         | 6         | 9         | 8         | 9         | 13         | 10        | 78         |
| Jun   | 3         | 3         | 10         | 11        | 13        | 1         | 5         | 3          | 7         | 56         |
| Jul   | 9         | 6         | 16         | 6         | 13        | 11        | 9         | 2          | 6         | 78         |
| Aug   | 9         | 6         | 5          | 11        | 14        | 10        | 12        | 14         | 6         | 87         |
| Sept  | 11        | 6         | 9          | 16        | 4         | 3         | 6         | 10         | 10        | 75         |
| Oct   | 7         | 6         | 4          | 1         | 6         | 8         | 4         | 6          | 3         | 45         |
| Nov   | 5         | 9         | 5          | 5         | 6         | 5         | 9         | 6          | 1         | 51         |
| Dec   | 3         | 5         | 7          | 9         | 4         | 3         | 1         | 5          | n/a       | 37         |
| Jan   | 3         | 11        | 15         | 12        | 7         | 28        | 7         | 15         | n/a       | 98         |
| Feb   | 2         | 5         | 13         | 12        | 7         | 15        | 7         | 16         | n/a       | 77         |
| Mar   | 2         | 12        | 3          | 4         | 12        | 3         | 14        | 7          | n/a       | 57         |
| <b>Total</b>  | <b>58</b> | <b>78</b> | <b>117</b> | <b>99</b> | <b>99</b> | <b>97</b> | <b>83</b> | <b>100</b> | <b>49</b> | <b>780</b> |
| Average number of cougars killed per year: 86   |           |           |            |           |           |           |           |            |           |            |
| Source: <a href="https://www2.gov.bc.ca/assets/gov/environment/plants-animals-and-ecosystems/conservation-officer-service/predatorstatisticscougar.pdf">https://www2.gov.bc.ca/assets/gov/environment/plants-animals-and-ecosystems/conservation-officer-service/predatorstatisticscougar.pdf</a> |           |           |            |           |           |           |           |            |           |            |
| Accessed December 28, 2019  |           |           |            |           |           |           |           |            |           |            |
| Dec 2019 - March 2020 not available/published yet   |           |           |            |           |           |           |           |            |           |            |

## Background history

9. The establishment of environmental law in B.C. dates back to 1858 (at that time primarily hunting legislation known as *game ordinances*). Environmental law enforcement has been the responsibility of various Crown departments for more than 100 years. When B.C. became a province in 1871, the responsibility for environmental law enforcement was placed under the B.C. Constabulary. Between 1905 and 1920, the formalizing of environmental law enforcement as a specialized policing area began under the direction of the Provincial Game Warden.
10. Due to financial and staffing issues, various game associations in the provincial at the time directly funded the positions, salaries and expenses of game wardens. The history of game laws enforcement is factually and sequentially linked to pro-hunting organizations in B.C.
11. In the 1920s, environmental enforcement responsibilities transitioned to the (then) B.C. Provincial Police.

Dead wrong

12. It is trite knowledge that the B.C. Provincial Police were disbanded in 1950. Provincial policing was transferred under contract to the RCMP. The terms “Game Warden”, “Bush Cop”, and “Game Constable” were replaced in the early 1960s with the title “Conservation Officer.” Environmental law enforcement operations reverted to the responsible ministry of the day, where they currently sit under the (now) Ministry of Environmental and Climate Change Strategy, B.C. Conservation Officer Service.
13. The BCCOS was established in 1980 as a law enforcement agency and formalized in legislation in 2003 under Section 106 of the *Environmental Management Act*; which provides, *inter alia*, that a Chief Conservation Officer can be appointed and that this Chief can then in turn appoint anyone he sees fit as a Conservation Officer. The Chief has general supervision of Conservation Officers. The *Act* also provides that the Chief may develop policies internal to the agency respecting the establishment of operational procedures pertaining to officer duties and the use of equipment and firearms.
14. These discretionary supervisory powers are subject to the direction of the Minister, in this case, Honourable Minister George Heyman – you.
15. Two primary issues with your December 20<sup>th</sup> 2019 comments will be addressed next. These are:
  - A. First, the concept that “no Conservation Officer likes to kill bears.”
  - B. Second, the emerging provincial communications strategy of “it’s the public’s fault.”

**A: No officer likes to kill bears**

16. In the past year there have been multiple public comments made by senior and field level Conservation Officers which echo a pattern of narrative that, “no officer likes to kill bears.” This concept was repeated in your recent December 20<sup>th</sup> 2019 quote:

...Not a single conservation officer relishes the thought of having to put down an animal, which is always a last resort for public safety...
17. Respectfully, Mr. Minister, this cannot be asserted. The subjective thoughts or motivations of each officer (over 100 individual people) cannot be known by yourself or the staff that is advising you. Some officers may like killing wildlife under the guise of state-sanctioned hunting for work and genuinely enjoy this as part of the job of Conservation Officer, some may not. While you may have been told that no officer likes to kill an animal you cannot assert this to be true in your capacity as a Minister.

Dead wrong

18. You also state that killing animals is “always a last resort for public safety.” This is categorically untrue.
19. The situations with bear cubs Jordan and Athena in 2015, and multiple instances where officers have killed bears cubs, because in the officer’s opinion they were unlikely to survive in the wild (such as the Fur-Bearers case with bear cub Dawson in 2016, two cubs in Furry Creek in 2019, and two cubs in Coquitlam in 2019), serve as examples of the inaccuracy of your quote.
20. The killing of bears and other wildlife often includes circumstances which are beyond immediate public safety concerns and are based instead on each individual officer’s beliefs, opinions, experiences, learned organizational behaviours, and accepted internal agency practices – factors which many of the public question.

**B: It’s the public’s fault**

21. The second narrative that must be explored is the concept that all bear killings are a result of attractant management issues in local municipalities. This presumption is based on the belief that if there were no non-natural foods available then there would be no public safety issues; as a result, no bears would be killed by Conservation Officers.
22. Because of this narrative, officers and government executive staff are trained to believe all bear deaths are the public’s fault. A “you made me do it” and “we had no choice” approach to justifying killing actions is adopted and indeed supported by executive staff within the BCCOS, as evidenced by years of media correspondence on the issue and your recent comments.
23. Killing any species (human or non-human) with government-issued service weapons is the sole responsibility of the officer pulling the trigger. Blaming the public for deaths, after an officer has killed, allows the agency and individual officer to avoid responsibility and overall accountability for the discharge of service weapons and munitions. It is akin to victim blaming, a pattern of justification often identified in the narratives of those who conduct violent crimes.
24. The consequence of narrative that attempts to state “no officer is responsible for the killing of bears or juvenile cubs” results in the potential for gratuitous use of lethal force on non-humans and an overall cavalier approach to serious killing actions.
25. As the minister responsible for providing direction to the Chief conservation Officer under section 106 of the *Environmental Management Act*, you should be concerned about the discharging of firearms in urban environments and most certainly worried about the use of distancing narratives which seek to avoid responsibility for killing actions.

Dead wrong

26. While it is important to recognize the role attractant management plays in providing non-natural foods to wildlife, mere access to non-natural foods does not necessarily equate to the charge habituation and most certainly does not address temporary opportunistic feeding as a result of urban expansion and population dispersion (which is not habituation).

### Concluding recommendations/comments

27. Both of the issues identified above highlight a theme of concerns with the accuracy of narratives used by the B.C. Conservation Officer Service and use of ministerial communications systems to maintain a desired public image.
28. Ultimately, the minister should be separate and independent of law enforcement functions and agencies in order that the public is served impartially. The narrative of “no officer likes to kill bears” and “it’s the public’s fault” only perpetuates a power structure within the BCCOS that is largely dominated by hunters at the field level. It does not reflect the broader diversity of provincial society or needs of our natural environment. It is a narrative that defends an organizational status quo which is historically rooted in pro-hunting culture and provincial game associations. For this reason, Pacific Wild is making the recommendation that your office to suspends the BCCOS’s use of ministerial communications systems.
29. While our organization is aware that independent oversight is currently being reviewed by the Ministry, it is important that this is an independent process which is not un-duly influenced by the current power regime within the BCCOS. Our organization maintains the position that independent oversight of the BCCOS is needed. As such, Pacific Wild is calling on your office to make independent oversight a priority for 2020 and to ensure a strategic implementation plan is provided before the next electoral cycle.
30. The severity of an officer’s actions impact not just wildlife but also people. This was brought to light earlier this year in Coquitlam, where a Conservation Officer alleged he was obstructed in his attempts to kill a family unit of bears. After being simply yelled at by a witness, the Conservation Officer in question is reported as having chased down an elderly man and to have dragged him from the steps of his home.
31. It is clear that having armed police like agencies without oversight or accountability mechanisms can have far reaching consequences not only to our wildlife but also to the charter rights of citizens. Pursuant to your authority as Minister under Section 106 of the *Environmental Management Act*, Pacific Wild is recommending that you provide direction to the Chief Conservation Officer to have all field officers outfitted with body cameras and to develop operational procedures for their use no later than April 1<sup>st</sup> 2020.

Dead wrong

32. Historically and structurally, the BCCOS is factually and sequentially linked to pro-hunting organizations. This has been largely maintained in modern times, to the extent that a uniformed ceremonial guard was even provided to the annual general meeting of the B.C. Wildlife Federation in 2019 (a provincial pro-hunting organization).

33. This style of public appearance calls into question the social legitimacy and impartiality of the BCCOS overall and raises questions about the diversity within its ranks and recruitment practices, issues which have been previously brought to the attention of your office.

34. Pacific Wild remains open to a face to face meeting regarding the structure, past, and future direction of the B.C. Conservation Officer Service.

Sincerely,



**Bryce Casavant** | Senior Conservation Policy Analyst

Email: [bryce@pacificwild.org](mailto:bryce@pacificwild.org)

Website: [pacificwild.org](http://pacificwild.org)

Per:

Ian McAllister, Executive Director



**PACIFICWILD**

Distribution list:

Mark Zacharias (via e-mail [DM.ENV@gov.bc.ca](mailto:DM.ENV@gov.bc.ca))  
Deputy Minister of Environment and Climate Change Strategy

Douglas Forsdick (via e-mail [Doug.Forsdick@gov.bc.ca](mailto:Doug.Forsdick@gov.bc.ca))  
Chief Conservation Officer



Running head: Calibrating accountability

Calibrating accountability:  
An open reply to the Minister of Environment and Climate Change Strategy

Honourable George Heyman  
Minister of Environment and Climate Change Strategy  
PO Box 9047 Stn Prov Gov  
Victoria, B.C. V8W 9E2

Via e-mail [ENV.Minister@gov.bc.ca](mailto:ENV.Minister@gov.bc.ca)

**February 11, 2020**

Re: Reference 354656 – Reply to Minister.  
Ref: Appendix A (copy of email submitted by ADM Jim Standen)

Dear Minister,

1. On January 1, 2020, Pacific Wild issued an open letter to you titled *Dead Wrong* (January 1, 2020) (the “**open letter**”). Certain concerns were raised regarding quotes made by yourself in your capacity as minister.
2. On February 4, 2020 (indexed here as Appendix A), Assistant Deputy Minister Mr. Jim Standen responded on your behalf.
3. Pacific Wild thanks the ministry for its attention to our concerns and for its commitment to officer accountability and public safety. Having said this, Mr. Standen’s response on your behalf does require some minor clarification (addressed below). While by no means exhaustive or all encompassing, Pacific Wild’s reply is provided here.

**Issues in reply**

4. For clarity, the primary concerns of our organization remain threefold. These are:
  - A. Misrepresentation of ministry data,
  - B. Use of narrative and rhetoric, and
  - C. Individual officer accountability.

## **A. Misrepresentation of ministry data**

5. A total number of cougars, grizzly bears, and black bears killed by your ministry was reported to you in our open letter. Late 2019 kill numbers were not available as our open letter was going to press. The ministry has now reported all 2019 kill numbers (reflected below). In the interests of brevity, I will only correct the ministry's presentation of 2019 data. However, this correction style can be extrapolated to other years.
6. Black bears remain the wildlife species most involved in co-existence issues in British Columbia. 577 black bears were killed in 2019 by your ministry. In justifying these numbers, Mr. Standen states, on your behalf:

“With respect to predator statistics, the COS received more than 20,000 calls related to conflicts with bears last year alone. This is important context to any analysis, highlighting that only a small fraction of calls ultimately leads to Conservation Officers being forced to put down bears in the interest of public safety, or animal welfare.”
7. These comments have also been recently made by ministry staff to CBC (and subsequently corrected by the reporter). Mr. Standen's response on your behalf is misleading. What are being identified as “calls” are not “attendances” by an officer.
8. The RAPP line takes a wide variety of calls from the public. Sometimes calls are simply sightings, other times calls are a single bear reported multiple times. In addition, many calls are simply irrelevant information to public safety and never receive a response.
9. Therefore, to understand the field actions of officers, we must correlate “kills” with “attendances” where we know the officer was in the field making public safety decisions. Correlating general call numbers with officer kill numbers results in artificially low statistics which are not an accurate reflection of the situation.
10. The corrected ministry data (not weighted by region or by specific officer involved shootings) for 2019 is as follows:

### Black bears

- Only 12.17% of “calls” were actually attended (2620 officer attendances out of 21,521 RAPP line calls). Note: This is generally consistent with my 2017 findings in *Law Gone Wild* which showed that approximately 80% of people who call the RAPP line do not actually receive a visit from an officer.

## Reply to Minister

Reference: 354656

- 22.02% of attendances resulted in the death of a bear (577 kills in 2019); an approximate average of 1 death for every 5 officer attendances. Note: media reports show that certain officers, on multiple occasions, have killed the entire family unit of bears in a single attendance. This affects general averages.
- A black bear's chances of translocation were less than 1% (12 translocations in 2019).
- Approximately 2% of attendances resulted in a bear cub being brought to rehabilitation in 2019 (52 cubs).
- The ministry is not reporting how many cubs were killed by officers. Cub kills are included in the general kill totals without separation. However, certain media articles in the Tri-cities area, as well as other public reporting, reveals that officers were killing black bear cubs in 2019.
- In the interest of transparency, another way to view these numbers would be to state that approximately 78% of officer attendances did not result in a lethal use of force situation on wildlife.
- Or put another way, 22% of officer call attendances created the majority of the ministry's public perception issues and public outrage in 2019.

### Grizzly bears

- 29% of calls were attended by an officer in 2019 (274 attendances out of 943 calls).
- 10.22% of attendances resulted in a grizzly bear killed (28 kills).
- 1.09% of attendances resulted in a cub going to rehab (3 cubs). Cub kills are not reported separately.
- Statistically, grizzly bear calls have a higher percentage of officer attendances than black bear calls.

### Cougars

- 14.78% of calls were attended by an officer in 2019 (420 attendances out of 2841 calls).
- 20.95% of attendances resulted in cougar kill (88 kills).
- 2 cougars were translocated in 2019 (less than 1% of attendances).
- Cougars are not rehabilitated in B.C. (0%).

## **B. Use of narrative and rhetoric**

11. The large majority of current ministerial response letters provided to the public, concerned citizens, and to media, include certain key phrases. As seen in Mr. Standen's reply, and other ministerial documents and comments made by ministry staff, these phrases include language such as:
  - "Bears and cubs that have lost their fear of people, or are conditioned to human food sources, are not considered good candidates for relocation or rehabilitation"
  - "...lost their fear of people"
  - "...conditioned to human food sources"
  - "...not considered good candidates for relocation or rehabilitation"
  - "habituation"
  - "unfortunate moment when an animal must be killed in the interest of public safety"
  - "...forced to put down"
  - "dangerous wildlife"
12. There is no reason for officers to kill bear cubs and there is absolutely no scientific evidence to support your staff's assertion that bear cubs are able to lose their fear of people and therefore must be killed by government staff. This concept is patently ridiculous. Various issues with the ministry's use of rhetoric and language was previously addressed in our open letter.
13. At no time, does the ministry address the issue of urban expansion, habitat loss, and opportunistic feeding. Rather, in justifying a killing action ministry staff *assume* urban bears must be attracted to garbage and therefore they must be habituated simply because of their presence in a community.
14. I agree that attractant management is important. However, it is not, by any measure, the sole reason for a bear's presence in an urban community and most certainly does not equate to the charge of habituation or public safety risk in all cases.
15. Pacific Wild maintains the concern that government staff are using ministerial communications to project certain misleading concepts about "public safety" and that the ministry has failed to conduct its due diligence in cumulative factors that contribute to urban wildlife presence.

## **C. Officer accountability**

16. Mr. Standen's response conflates law enforcement use of lethal force (i.e., the use and discharging of service weapons) with ministerial wildlife control activities.

17. General wildlife management activities are not the responsibility of law enforcement and are not within your ministry's portfolio.
18. As highlighted on our open letter, it is, and must always be the individual law enforcement officer that is accountable for the discharge of a service weapon.
19. I do not continue to blame officers for wildlife kills as Mr. Standen suggests. I'm quite simply pointing out that trash doesn't kill a bear, the officer pulling the trigger does. In some cases, this use of lethal force may very well be justified. In other cases (such as the killing of cubs) it is not.
20. For a variety reasons, which I would hope are self-evident to a person in your capacity, victim blaming and responsibility deflection are not appropriate cultural norms for an armed law enforcement agency. The narrative of "you made me do it", echoed in Mr. Standen's response on your behalf, should not be supported by you in your capacity as a Minister of the Crown.
21. Recently, an officer in the Tri-cities area discharged their weapon in low light and nighttime winter conditions, while in an urban environment. The bear that was shot was not killed but rather roamed the neighbourhood for days, wounded and without being located. This highlights ongoing issues with public safety and wildlife welfare.
22. Pacific Wild maintains its concerns with accountability that were raised in our open letter. It is important that each individual officer is held accountable for use of lethal force encounters and the discharging of service weapons.

### **Concluding remarks**

23. Finally, Mr. Minister, rightly or wrongly the pro-hunting roots of the B.C. Conservation Officer Service is a historically factual claim – not conjecture. The involvement of officers in game associations and guide outfitting is well documented in provincial archives and records.
24. Mr. Minister, you will not be able to kill your way out of what is better described as a co-existence and wildlife proximity tolerance issue in expanding urban areas. To that end, I note academic advancements in compassionate conservation which are being adopted in various jurisdictions throughout the world.

Reply to Minister  
Reference: 354656

Sincerely,



**Bryce Casavant** | Senior Conservation Policy Analyst

Email: [bryce@pacificwild.org](mailto:bryce@pacificwild.org)

Website: [pacificwild.org](http://pacificwild.org)

Per:

Ian McAllister, Executive Director



**PACIFICWILD**

Distribution list:

Jim Standen (via e-mail [jim.standen@govbc.ca](mailto:jim.standen@govbc.ca))  
Assistant Deputy Minister of Environment and Climate Change Strategy

Mark Zacharias (via e-mail [DM.ENV@gov.bc.ca](mailto:DM.ENV@gov.bc.ca))  
Deputy Minister of Environment and Climate Change Strategy

Douglas Forsdick (via e-mail [Doug.Forsdick@gov.bc.ca](mailto:Doug.Forsdick@gov.bc.ca))  
Chief Conservation Officer

p/c  
OPEN

Reply to Minister  
Reference: 354656

## Appendix A

Reference: 354656

*February 4, 2020*

Bryce Casavant  
Senior Conservation Policy Analyst  
Pacific Wild  
Email: [bryce@pacificwild.org](mailto:bryce@pacificwild.org)

Dear Bryce Casavant:

Thank you for your letter of January 1, 2020, addressed to the Honourable George Heyman, Minister of Environment and Climate Change Strategy, regarding the Conservation Officer Service (COS). Minister Heyman has asked that I respond on his behalf.

In your letter, you repeat assertions regarding the integrity of the service and a perceived “pro-hunting culture.” Your letter challenges the concept that “no Conservation Officer likes to kill bears.” I will concede that it is beyond me or anyone to know the motivation of every single officer in the service. Neither you nor I can know for certain what thoughts and feelings each officer experiences in that unfortunate moment when an animal must be killed in the interest of public safety. What I can say with certainty is that the efforts of the organization and its leadership, myself included, are intended to deliver on its dual mandate of public safety and conservation.

With respect to predator statistics, the COS received more than 20,000 calls related to conflicts with bears last year alone. This is important context to any analysis, highlighting that only a small fraction of calls ultimately leads to Conservation Officers being forced to put down bears in the interest of public safety, or animal welfare. That said, even one bear put down is too many.

Unfortunately, the reality is that habituation is common, leads to conflict and then limits what options are available to officers. Several factors, including an animal’s history, level of food conditioning and habituation, are assessed as part of the decision-making process, which is also guided by scientific data, procedures and policies to ensure the correct conclusions are made. Conservation Officers will also consult with wildlife veterinarians, biologists and other experts, as appropriate.

Efforts are made to relocate or rehabilitate problem wildlife where possible. Bears and cubs that have lost their fear of people, or are conditioned to human food sources, are not considered good candidates for relocation or rehabilitation. Conservation Officers also use non-lethal projectiles and other deterrents, primarily in Bear Smart communities where these tools will be more effective. Research has found that these tools are less effective where bears have an opportunity to become food conditioned. So, while you may choose to lay blame with the COS, biology and circumstances often leave few options available, with many of these situations being human-caused and preventable.

To help reduce wildlife conflicts in communities, the COS recently undertook a province-wide attractant audit. During the audits, Conservation Officers patrolled neighbourhoods and other areas to ensure attractants were properly secured, which resulted in hundreds of enforcement actions. Hundreds of hours were also spent educating the public on the importance of managing attractants, which is the best way to prevent wildlife conflicts.

The ministry and COS are determined to significantly reduce the role of attractants through education and, where necessary, strengthened enforcement measures. Attractant audits will resume in the spring. To understate the significance of poor attractant management in human-wildlife conflict would be a disservice to wildlife and the safety of the public. Effective public communications through all available channels has been and will continue to be a key element of this strategy.

## Reply to Minister

Reference: 354656

With respect to your enquiries regarding oversight, the COS agrees that maintaining public trust and confidence is essential. We recognize that adding an independent third-party component to the COS complaints process could help in this regard and as such, we are committed to implementing this as soon as possible. We have already implemented changes to the COS website to make it easier to access information regarding the current complaints process, including the outcomes of complaints. The COS is also aware that numerous law enforcement agencies use body cameras as another tool to provide transparency and collect evidence for court proceedings. The COS is exploring the possibility of adopting new tools, such as body cameras, as part of its continuous improvement process.

As noted above, management of human-wildlife conflict follows policies developed by wildlife managers and scientists. To further ensure objectivity and increase transparency, the COS is also currently working with the Ministry of Forests, Lands, Natural Resource Operations and Rural Development to discuss innovative ways to receive comments related to policy review. While it is too early to speculate on any final decisions, further details will be released as they become available.

Thank you again for taking the time to write.

Sincerely,

Jim Standen  
Assistant Deputy Minister  
BC Parks and Conservation Officer Service Division

cc: Honourable George Heyman, Minister of Environment and Climate Change Strategy