



**Province must recall assault-style rifles issued to staff:**  
*An open memorandum of concern to the B.C. premier-designate*

David Eby  
Premier Designate  
Province of British Columbia

**October 25, 2022**

Re: Memorandum of concern. Recall of assault-style rifles in public services.

**Our concerns & request**

- [1]. Pacific Wild Alliance is an environmental charity with headquarters in Victoria, British Columbia. It has recently come to our attention that the Province is using assault-style rifles for wildlife conservation work.
- [2]. The class of weapons being issued and used is relatively the same as those in the École Polytechnique Massacre and more recent Nova Scotia shootings.
- [3]. Based on the records before us, the use of assault-style rifles is shown as happening in two program areas: the Ministry of Forests (wolf cull), and the Ministry of Environment, B.C. Conservation Officer Service (“**BCCOS**”) (general uniformed duty).
- [4]. For the reasons discussed below, we find it highly unlikely that the program areas have been transparent with this administration and the public in their intentions to purchase this class of weapons for general duty work.
- [5]. We respectfully request your action on three fronts:
  - a. The assault rifles being used by the province’s staff are recalled immediately and secured in government storage facilities authorized and inspected by the RCMP (in many cases the assault rifles are currently being taken home by provincial staff and stored on personal premises while off duty).
  - b. A civilian police oversight board is immediately struck to oversee the operations of the BCCOS.

- c. Plain language regulations should be brought into immediate effect respecting the naming convention of the class of weapons being purchased and used by public service staff. A plain language provision is suggested as:

**Definition:** A rifle or carbine designed and manufactured with intention for use in modern military combat operations, whether fully automatic or not. This includes, but is not limited to, 'AR'-style weapons platforms, patrol carbines, patrol rifles, and assault-style weapons, including semi-automatic military-grade rifles.

### **BCCOS specific concerns**

- [6]. The BCCOS program area has confirmed the purchase of new 'patrol rifles' and that these rifles are common in law enforcement agencies. A picture was released publicly on the government Twitter page.
- [7]. In using this language, the BCCOS has failed to adequately advise the ministry's designated authorities on three main fronts:
  - a. First, by calling it a 'patrol rifle' the BCCOS has inappropriately disguised the class of weapons it intended to purchase. It has left the ministry and the public with the impression that it was replacing old hunting rifles with new ones. In fact, it was setting the stage for a military upgrade. By downplaying the military-grade weapons it intended to buy, the BCCOS has misled this NDP administration and the public. It should not be further rewarded as a program area by being allowed to keep the weapons, without strict control measures in place and direct ministry supervision.
  - b. Second, the BCCOS appears to be taking the prerogative to arm itself without 3rd party oversight. To our knowledge, the BCCOS has not informed the responsible minister that it is standard practice for officers to take rifles home (unlike their police counterparts). This places the responsible ministry in a position of great liability and potential for significant harm to the public and others. This style of weapon, especially with high-capacity magazines, must be stored in a secure government facility when off duty and must not be stored in the personal homes of staff. An immediate recall of government property is therefore warranted.
  - c. The BCCOS has not restricted the use and deployment of these assault-style rifles in any way. For example, there is no restriction on their use in urban areas and environments or when interacting with the public. The public-facing response that the use of firearms is only wildlife-oriented is incorrect and misleading. It is our understanding these weapons are being widely used in the lower mainland of B.C., in a wide array of circumstances involving public interactions.

### **Wolf cull specific concerns**

- [8]. In freedom of information records obtained by our organization (#FNR-2022-20672), it is stated by government staff that a .308 semi-automatic rifle with a high-capacity 30 round magazine will be used to shoot wolves. This is an assault-style weapon. The 30 round magazine referenced is prohibited for civilian possession and use.
- [9]. There are no exemptions on the public record, or in the ministry documents before us, that allow for the possession or use of prohibited items by a civilian, whether under government contract or not. This raises many questions regarding the exact nature of acquisition and use of prohibited items by civilian ministry contractors.

### **Previous communications & lack of responses**

- [10]. On January 1, 2020, we wrote an open letter to the responsible ministry titled *Dead Wrong*. Our organization highlighted a trend in wildlife killings by government staff and situations of inappropriate use of force involving the public.
- [11]. In *Dead Wrong*, we asked for greater transparency in provincial environmental police services and called for the use of body cameras on frontline BCCOS officers.
- [12]. On February 4, 2020, the ministry responded with a series of boiler plate answers to our concerns. These were insufficient and contained inaccurate government kill data and concerning rhetoric. The ministry did not commit to a body camera pilot project.
- [13]. On February 11, 2020, we wrote a follow-up communication to the responsible ministry titled *Calibrating accountability*. In this letter we corrected ministry boilerplate rhetoric and kill data. We confirmed our calls for greater transparency and oversight.
- [14]. As we appreciate the complex nature of the BCCOS and its program area, we provided a full year for the ministry to further respond. The ministry did not respond.
- [15]. On January 7, 2022, we wrote a further follow-up letter to the minister titled *No Response: An open letter to the Minister of Environment and Climate Change Strategy*. In this letter we reviewed the communications to date and specifically requested a meeting.
- [16]. No response was received and no meeting granted.
- [17]. On September 21, 2022, and in reference to the wolf cull, we obtained copies of freedom of information responsive records #FNR-2022-20672.

- [18]. At page 21 it states “[...]. The rifle will be a .308 semi-automatic rifle equipped with extended 30 round magazines using a red dot scope for quick and accurate target acquisition.”
- [19]. On September 25, 2022, a picture was posted on the government’s BCCOS public Twitter page showing a BCCOS officer carrying such a rifle on the front lawn of the Legislature.
- [20]. Between September 25 and October 10, 2022, we sought to verify the information provided to us.
- [21]. On October 11, 2022, we reached out to the BCCOS requesting confirmation of the rifles and involvement of the BCCOS in the wolf cull, if any.
- [22]. The BCCOS did not respond and has not responded to date.

### **Further discussion**

- [23]. In today’s climate, with the current federal government’s ban on military-assault style rifles, it is inappropriate that the provincial NDP administration would allow staff to possess (sometimes off-duty) and deploy weapons like these.
- [24]. It is our understanding that there was no Indigenous consultation or community engagement prior to the purchase and deployment of these weapons.
- [25]. The use, possession and deployment of these weapons suggests to the public that the Province is paramilitarizing our wildlife conservation services. This situation now presents a reasonable probability of escalating officer use of force on non-human species and contributing to greater ministry and government liabilities in the long term.
- [26]. For over two years Pacific Wild has advocated for increased transparency in wildlife killings and use of force on the public by the B.C. Conservation Office Service (BCCOS). We previously called for a pilot project that would place body cameras on BCCOS officers. We have called for independent civilian oversight. Instead of body cameras and greater transparency, the public is presented with assault-style rifles and further paramilitarization.
- [27]. This type of ministerial behaviour only promotes the use of assault-style weapons in Canadian society and an *us-versus-them* policing approach. It is escalatory and ill-considered for public services.
- [28]. Pacific Wild is willing to assist in the structuring of a body camera pilot project. We are further able to help the ministry explore partial and joint funding opportunities for the purchase of body cameras for officers.

### Summary remarks

- [29]. As the premier-designate, it is important that you are aware of the purchase and use of these weapons in your public service.
- [30]. The deployment and use of these weapons sends a cumulative *war-like* provincial message to the public, a hardened stance that is militaristic in appearance and operational practice. Where we seek a wild peace, we receive only provincial messages of aggression from this NDP administration.
- [31]. It is incredulous to our organization that a simple request for body cameras and civilian oversight receives no consideration, while the purchase of assault-style weapons is prioritized and expedited. We remain committed to assisting the responsible ministry and your government with the development of a body camera pilot project for officers.
- [32]. We further maintain the requests made in the first part of this letter, presented again in brief as:
- a. These weapons are recalled immediately from any homes of provincial staff and that they are secured in approved government facilities. That their use be ended in general duty operations.
  - b. The direction for a civilian oversight body to be struck to oversee the operations of the BCCOS.
  - c. Plain language regulations be drafted without delay respecting the naming convention for military grade assault style weapons in the public service.

Yours in concern,



**Dr. Bryce J. Casavant** *Director of Conservation Intelligence*  
Program area: Green Governance & Emerging Legal Affairs  
Email: [Bryce@pacificwild.org](mailto:Bryce@pacificwild.org)  
Website: [pacificwild.org](http://pacificwild.org)