



**PACIFIC WILD ALLIANCE**  
1529 AMELIA STREET  
VICTORIA, BC  
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May 31, 2021

Honourable David Eby  
Attorney General  
PO Box 9044 Stn Prov Gov't  
Victoria, BC, V8W 9E2  
AG.Minister@gov.bc.ca

RE: Wildlife Killing Contests

Dear Honourable Minister Eby,

I represent Pacific Wild and on its behalf, I am writing to inform you of two wildlife killing contests currently underway in British Columbia that we believe to be illegal because they are being held without a permit or license and therefore contravene the BC Gaming Control Act. Furthermore, we believe these wildlife killing contests should be illegal under the Wildlife Act because they commercially incentivize indiscriminate killing of wildlife for individual profit, are unregulated and have no basis in science or accepted wildlife management practices.

<http://www.huntingbc.ca/forum/showthread.php?164755-Bear-derby-2021&fbclid=IwAR0HCIs7QI6sUA7o2wVI34tz1-VgBNufvLtHYcKSRmz3PKZJvsbv8jTqmUk>

<http://www.crestonvalleyrodandgunclub.org/search/label/Ungulate%20Survival%20-%20Predator%20Control>

*Under Canada's Criminal Code and British Columbia's Gaming Control Act for an activity to be considered gaming, the following three elements must be present: 1. Consideration means players must pay or exchange something of value to be eligible to participate; 2. Prize includes awarding money or anything of value; and 3. Chance means the outcome is not pre-determined or determined solely by skill. Gaming events conducted in British Columbia must be licensed by the Gaming Policy and Enforcement Branch (GPEB), which licenses eligible community organizations to conduct and manage gaming events in accordance with Sections 207(1)(b)(c)(d) of the Criminal Code of Canada. To conduct a gaming event without a licence is unlawful.*

We believe that number 2. and 3. clearly fall under the British Columbia Gaming Control Act definition of "Gaming" given that both of these contests are offering cash and other prizes and the outcome is not

predetermined. While we do not know what the application fee is for these particular contests we believe these contests contravene number 1. of the Act because general and specific hunting licenses must be purchased by contest participants providing the BC government with increased revenue which is a form of “consideration” and clearly places the Province in a conflict of interest position.

Wildlife killing contests are also a violation of public trust. It is the belief and understanding of the citizenry of British Columbia that the provincial and federal governments manage and steward wildlife in trust for broader ecosystem needs and for future generations.

The attached kill contests are currently underway and time is off the essence. We respectfully look forward to hearing from you.

Sincerely,



Karen McAllister  
Acting Executive Director

CC:

Honourable George Heyman  
Minister of Environment and Climate Change Strategy  
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