



Follow-on correspondence respecting the B.C. wolf kill program photo release

Honourable Nathan Cullen
Minister of Water, Land and Resource Stewardship
PO Box 9012 Stn Prov. Govt.
Victoria, BC V8M 9L6

Via e-mail: WLRs.minister@gov.bc.ca

Lori Halls
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Via e-mail: lori.d.halls@gov.bc.ca

April 18th 2023

Re: Troubled Triggers (2023) – FWR 2022 23324 (2023) – Ministry ancillary reference 29094 (2023).

Dear Minister,

- [1]. Pacific Wild Alliance (PWA) is a registered environmental charity with a direct interest in the B.C. wolf cull.

Background in brief

- [2]. Between July 7th and October 28th, 2021, PWA brought various concerns relating to the wolf cull forward to the B.C. Supreme Court for Judicial Review. On June 1st, 2022, written reasons for judgment were issued.¹
- [3]. On January 5th, 2023, a previous FOI request was narrowed in ministry-applicant collaborative efforts to streamline responsive records release.²

¹ Pacific Wild Alliance v. British Columbia (Forests, Lands, Natural Resource Operations and Rural Development), 2022 BCSC 904.

² Ministry File: 292-30/LWR-2022-23324.

Wolf cull - photos

- [4]. On January 19th, 2023, the undersigned author issued an open letter titled *Trouble Triggers: Correcting the Aim on B.C.'s Wolf Cull*. This letter challenged the province on its withholding of certain photographic evidence relating to the B.C. wolf cull and called for such records to be publicly released. Additional comments pertaining to the litigation history noted above were mentioned. Further, general history of the wolf cull was provided, and a third-party independent audit was requested.³ This letter is attached here as Appendix A. The Province of B.C. has not responded.
- [5]. On February 24th, 2023, a sister NGO received ministerial correspondence from Deputy Minister (DM) Lori Halls stating, in part, that no photos were taken or existed of the wolf cull within the Itcha-Ilgachuz area. Problematically, this confirmation appears to run counter to the permit requirements issued by the ministry. DM Halls further asserted that the American Veterinary Medical Association's (AVMA) *Guidelines for the Euthanasia of Animals* (2020) are followed for gunshot killings. DM Halls' letter was assigned Reference # 29094 and is attached here as Appendix B. The name and email of the recipient has been removed at their request.
- [6]. On March 6th, 2023, the undersigned author wrote an opinion editorial relating to the B.C. wolf cull. This was published by the Times Colonist. This opinion editorial raised various issues with government program staff stating they would never release photos of the B.C. wolf cull.⁴
- [7]. On April 12th, 2023, the Province of B.C. partially complied with PWA's FOI request LWR 2022 – 23324. Forty-six colour photos of wolves killed between 2015-2022 were released.

Preliminary review of photos

- [8]. Some of the photos released may not align with the assertions of DM Halls that veterinarian guidelines are being met. Specifically, the majority of shots indicated in the responsive records are not controlled head shots. Further, a review of the AVMA's *Guidelines for the Euthanasia of Animals* (2020)⁵ do not reveal consistency with DM Halls' assertion that "gunshots" broadly are "[...] an acceptable and effective method for humanely killing carnivores and is the preferred method for removing large, free-ranging carnivores from the landscape."
- [9]. The AVMA guidelines go to great lengths to separate the types of shots, location of shots on an animal's body, and types of ammunition used. The AVMA guidelines are clear that body shots (chest, shoulders, lungs and so forth) are not forms of instantaneous kills which eliminate suffering. To the contrary, while noting headshots for free-roaming wildlife are not always possible.

³ Pacific Wild Alliance. (19 January 2023). *Troubled Triggers: Correcting the Aim on B.C.'s Wolf Cull*. Victoria: PWA. <https://pacificwild.org/open-letter-troubled-triggers-correcting-the-aim-on-b-c-s-wolf-cull/>

⁴ Casavant, B. (6 March 2023). Comment: Province's wolf kill requires transparency — and another look. Victoria: Times Colonist. <https://www.timescolonist.com/opinion/comment-provinces-wolf-kill-requires-transparency-and-another-look-6652026>

⁵ American Veterinary Medical Association. (2020). *AVMA Guidelines for the Euthanasia of Animals*. s. M3.5 – M3.5.4. <https://www.avma.org/sites/default/files/2020-02/Guidelines-on-Euthanasia-2020.pdf>

Wolf cull - photos

- [10]. The AVMA maintains: “For wildlife and other freely roaming animals, the preferred target area should be the head [...] The appropriate firearm should be selected for the situation, with the goal being penetration and destruction of brain tissue without emergence from the contralateral side of the head. [...] A gunshot to the heart or neck does not immediately render animals unconscious but may be required when it is not possible to meet the POE’s definition of euthanasia.” PWA has sought independent and specialized veterinarian advice on the AVMA guidelines.
- [11]. Further, contrary to DM Halls’ letter, and previous extensive provincial records released through FOI, ministry staff have not provided a high level of shooter oversight on all occasions. The photos, in part, therefore run counter to long-standing ministry narratives.

Ongoing matters

- [12]. While PWA is thankful to staff within IAO and DM Halls’ office for ensuring our information requests were processed (in part), our organization remains concerned that out of the over 1,700 wolves killed there are only a mere 46 photographs of responsive records. In assessing the overall humaneness of the wolf kill program, this sample size of shooter actions is not large enough to currently make a fully informed decision on the ethical matters at play. Concerningly, there appear to be over 600 photos missing from responsive records.
- [13]. On April 14th, 2023, PWA received further records relating to the wolf cull. These records included detailed shot notes from wolf kills and a further ministry policy document dated December 2022 in which the ministry purports to suggest that killing wolves with buckshot from a shotgun is a humane killing method. PWA will be addressing these matters in further correspondence at a later time.

Concluding comments

- [14]. While PWA continues to work with ministry staff to recover further responsive records, it is our position that these extensive (and often frustrating) information recovery efforts should not be required. Rather, the Province of B.C. should proactively release all wolf cull photos, videos, and postmortem reports. This would allow for independent scientific analysis and audit of the wolf cull.

Sincerely,



Dr. Bryce J. Casavant *Director of Conservation Intelligence*

Per,

Pacific Wild Alliance

Website: pacificwild.org

Personal contact information redacted

APPENDIX 1



Troubled triggers: Correcting the aim on B.C.'s wolf cull

An Open Letter to the Responsible Minister

Mr. Nathan Cullen
Minister of Water, Land and Resource Stewardship
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Victoria, BC V8M 9L6
Via e-mail
LWRS.Minister@gov.bc.ca

Mr. Bruce Ralston
Minister of Forests
Via e-mail
FLNR.Minister@gov.bc.ca

Mr. David Eby
Premier
Province of British Columbia
Via e-mail
premier@gov.bc.ca

January 18 2023

Re: Request for proactive disclosure of wolf cull photos and videos.

Ref: *Appendix 1 to this letter contains a list of public media relating to the cull, which is a policy factor required for your decision in relation to this request for proactive disclosure.*

Dear Minister,

- [1]. Pacific Wild Alliance is a registered Canadian environmental charity specializing in visual storytelling and public conservation education. Pacific Wild has a direct interest in the Province of B.C.'s wolf cull program.
- [2]. Pacific Wild seeks the Ministry's proactive release of pictures and videos pertaining to the B.C. wolf cull. This proactive release would be consistent with the statutory intent of the Province's information laws.

Wolf cull image release

- [3]. In response to recent mainstream news media coverage about the wolf cull, the Ministry did not publicly provide the photos of killed wolves currently in the Ministry's possession.
- [4]. In December 2022 Pacific Wild tried to recover the aforementioned photos in the government's possession by filing information requests with both the Ministry of Forests (MoF) and the Ministry of Water, Land and Resource Stewardship (referenced here as "the responsive Ministry"). The program head for the MoF responded that the records could not be found and that a new ministry had taken over the government's wolf killing program (i.e., the responsive Ministry). No confirmation of records transfer, retention, or information security for responsive records between the responsible ministries was provided to Pacific Wild. The request for records was unilaterally closed by MoF, in part.
- [5]. In late December 2022 and early January 2023, Pacific Wild responded with a series of questions for the government's communications branch. Pacific Wild sought clarity on the retention of responsive records (i.e., photos and videos of government sanctioned wolf kills) and confirmation that they were being handled securely and without deletions.
- [6]. The government did not provide any further substantive response, other than no further information would be forthcoming while Pacific Wild pursued the long and arduous information process.
- [7]. Pacific Wild was then informed by the responsive Ministry (Water, Land, Resource Stewardship) that a preliminary search revealed the government may, at a minimum, have approximately **600 photographs and 14 videos** relating to the wolf cull. Pacific Wild was requested to pay a preliminary fee of \$810 dollars for the government to continue to search its own records systems for further photographs and videos relating to the wolf cull.
- [8]. On January 5th 2023, Pacific Wild did pay the fees from charitable funds received from our donors. Although this information request continues, in Pacific Wild's view it should not be necessary. This letter is the next logical step in escalating the matter of proactive disclosure for photos and videos of the wolf cull.

A brief history of public interest & controversy

- [9]. The B.C. wolf cull has a long history of controversy and public outrage dating back to the early 1900s. Between 1920 and 1950 a "bounty" program killed over 27,000 wolves in B.C.. This was ended, in part, due to public outrage and political protest surrounding the government expenditures of large-scale bounty payments to individual civilian hunters, often because of fraudulent claims for compensation.

Wolf cull image release

- [10]. Between 1950 and 1980, resulting in large part from provincial fraud investigations, the bounty system was replaced with a government-run predator culling program in which thousands of wolves were killed. Following renewed public outrage and media scrutiny, a successful court case in the late 1980s was filed by the Wilderness Committee and the cull was halted.
- [11]. In 2015 the wolf cull was once again revived. Between 2015 and 2022 around **1704 wolves were killed** at a cost of approximately 6 million program dollars. The government has stated it intends to continue with the cull. The government's killing of wolves has a long history directly tied to heated public controversy surrounding the ethics of the killing activities and the expenditures of public finances for such killing actions.
- [12]. Since the 1980s, the *Wildlife Act* has undergone many iterations with the most recent being 2020, following a legal challenge to the wolf cull's permitting provisions filed by Pacific Wild. In that case, to avoid negative judicial consideration, the Province facilitated an emergency rewrite of the applicable regulations and also obtained the missing federal exemption permits it otherwise required. Although Pacific Wild was grateful to the courts for their analysis and granting of public interest standing in the wolf cull, it remains a frustrating point of contention that the public service is able to avoid legal challenge to its programs by emergency regulatory drafting and secretive records retention processes. From Pacific Wild's perspective, the Ministry is not able to stand public or judicial scrutiny on the factual, ethical, or substantive legal merits of the wolf cull. Rather, it is required to resort to clandestine records retention regimes and underhanded carpet-pulling litigation strategies to avoid an independent weighting and review of the wolf cull. Currently, the B.C. wolf cull employs individuals with semi-automatic rifles (i.e., assault-style weapons) to shoot wolves from helicopters during the winter. Recently, the public learned that the government was also killing wolf pups. The government maintains that its shooting activities are ethical and humane and that the kills are verified by the shooters and independently by a provincial veterinarian. Yet, at the same time, the public is being denied access to records that could verify or challenge such claims.

A matter of public interest

- [13]. The Ministry has publicly confirmed to news outlets that photos of wolf kills have been taken during the cull and are retained by various public servants. Indeed, this is also a requirement of the *Wildlife Act* permits issued for these activities.
- [14]. Although the government has routinely stated the killing of wolves is humane and ethical, the shootings have largely been done in a secretive manner with little oversight. This is reflected in the Ministry's own correspondences, contracts, policies, and missives; documents which clearly state that provincial oversight was not always possible due to government staff availability. The withholding of pictures and videos of the wolf cull unnecessarily restricts the public's ability to hold the government to account for the humaneness and ethical aspects of the wolf killings.

Wolf cull image release

- [15]. Pictures which may show dead wolves and various shot placements can speak directly to the ethical controversies and provide new information to the public debate on this matter.
- [16]. The public's interest in the treatment of canids was clear during the Whistler sled dog cull trial, in which sled dogs were shot multiple times and some had their throats slit with a knife. The Crown Prosecution Service prosecuted the file in the public's interest – a focal point of the case were the actions being used to kill the sled dogs, and if those processes were humane and ethical or caused unnecessary suffering.
- [17]. Recently, Global News has reported that renowned animal behaviorist Temple Grandin maintains third-party auditing of the government's wolf kill actions are essential to accountability and transparency. The photos and videos of these wolf kills speak directly to field-level killing practices. It is only with this information that the humaneness and ethics of the cull can be analyzed and assessed by third parties and the public, essential factors to open and transparent ministerial and public debate.
- [18]. Pacific Wild has also directly participated in public interest litigation on the B.C. wolf cull which saw substantial revisions to the regulatory frameworks allowing the culling activities to occur.
- [19]. A partial list of media attention and issues notoriety is attached to this letter as Appendix A. It cannot be disputed that there is significant notoriety pertaining to the B.C. wolf cull and that the photos and videos would allow environmental charities and the public greater transparency of the government's policy decisions.

The authority to release

- [20]. The intent of B.C.'s information access laws is clearly established by statute and further interpreted by various orders of the privacy commissioner. In brief, access to information is essential to an accountable government in a democratic society. It is not necessary to force all information to go through a lengthy process of information requests. The government has the statutory authority to take proactive steps in releasing certain information critical to public discourse and interest.
- [21]. Section 25(1)(b) of the *Freedom of Information and Protection of Privacy Act*, RSBC 1996, c. 165 ("FIPPA") provides that the head of a public body must disclose without delay information that is clearly in the public's interest or relates to a significant risk to the environment.

Information must be disclosed if in the public interest

25 (1) Whether or not a request for access is made, the head of a public body must, without delay, disclose to the public, to an affected group of people or to an applicant, information

(a) about a risk of significant harm to the environment or to the health or safety of the public or a group of people, or

(b) the disclosure of which is, for any other reason, clearly in the public interest. [emphasis added].

Summary remarks

- [22]. The B.C. wolf cull is an issue of significant public controversy and notoriety. A reasonable and objective observer can see that the release of photos and videos would allow for verification of killing ethics and more detailed information in the public debate on the matter of financial allocations and uses of government finances. It may seem cliché to say, “a picture is worth a thousand words” but Pacific Wild does believe proactive release will help tell a fuller story about a thousand wolves. Considering no independent research ethics certificate can be located for the province’s wolf cull, it is reasonable and prudent to allow the public access to records that can assist in verifying the results of government policies, decisions, and financial expenditures. As well, this would allow for fact checking of government communications being made to the public and media about the humaneness and ethics of the cull.
- [23]. The historical information stated in this letter is readily available through provincial seminal reports and ministerial missives from the years of 1905 to present, as well as, various government wolf cull contracts, formal policies, and shooting permits between the years of 2015-2022. In the interests of brevity, the expansive referencing catalogs, previous freedom of information requests, and statutory and case references have been eliminated here. However, this referencing information is available if required, or on further request from your staff (if required).
- [24]. As a final comment, Pacific Wild wishes to advise your Ministry (and the MoF) that all responsive records relating to pictures and/or videos of the wolf cull must be secured and retained in a manner that future access can be provided should the program head not proactively release them as requested here. We thank you in advance for your consideration. Pacific Wild can be reached at the contact information provided within the signature block of the email dated today.

Wolf cull image release

Sincerely,

A handwritten signature in blue ink, appearing to read "B. Casavant". The signature is fluid and cursive, with a large initial "B" and a long, sweeping tail.

Dr. Bryce J. Casavant *Director of Conservation Intelligence*

Per,

Pacific Wild Alliance, CANADA

Website: pacificwild.org

Personal contact information redacted for public release

APPENDIX 1

2023:

'Death by a thousand clearcuts': Canada's deep snow Caribou are vanishing

<https://thenarwhal.ca/canada-deep-snow-caribou-vanish/> The Narwhal, January 14, 2023, Sarah Cox

2022:

B.C. extends aerial wolf cull for five more years

<https://www.cbc.ca/news/canada/british-columbia/bc-wolf-cull-extended-1.6330780> CBC, January 31, 2022, Courtney Dickson

British Columbia Will Extend Its Controversial Wolf Cull Program to Help Mountain Caribou

<https://www.outdoorlife.com/conservation/british-columbia-wolf-cull-program-to-help-caribou/>

Outdoor Life, Feb 1 2022, Dac Collins

Animal rights group in B.C. says wolf cull extended without proper evidence

<https://www.aptnnews.ca/national-news/animal-rights-group-in-b-c-says-wolf-cull-extended-without-proper-evidence/> APTN National News, March 22, 2022, Tina House

'It's shameful, it's horrifying': B.C. conservationists call for end to controversial wolf cull

<https://globalnews.ca/news/8795246/bc-wolf-cull-helicopter-gunning-conservation-caribou/> Global News, April 28, 2022, Amy Judd & Paul Johnson

Wolf management in B.C.

<https://spca.bc.ca/ways-to-help/take-action/wild-animals/wolf-management/>

Caribou recovery plan sees 156 wolves culled in West Chilcotin mountains in last 3 years

<https://www.clearwatertimes.com/news/caribou-recovery-plan-sees-156-wolves-culled-in-west-chilcotin-mountains-in-last-3-years/> - Clearwater Times, September 15, 2022, Monica Lamb-Yorski

Advocates suggest BC taxpayer-funded wolf cull is hypocritical

<https://dailyhive.com/vancouver/bc-wolf-pup-cull-hypocrisy-conservation> Daily Hive News, November 24, 2022, Amir Ali

B.C. government won't release photos of controversial wolf cull

<https://globalnews.ca/news/9336734/bc-government-photos-classified-wolf-cull/> - Global News, BC Government, December 8, 2022, Elizabeth McSheffrey & Paul Johnson

B.C. government admits to no audits of wolf kill program

<https://globalnews.ca/video/9356037/b-c-government-admits-to-no-audits-of-wolf-kill-program> Global News, December 16, 2022

Wolf cull image release

2021:

B.C. subsidizes oil and gas drilling in caribou habitat it's supposed to protect: study

<https://www.piquenewsmagazine.com/must-reads/bc-subsidizes-oil-and-gas-drilling-in-caribou-habitat-its-supposed-to-protect-study-4479246> Pique News Magazine, Oct 1 2021, Stefan Labbe

Killing Wolves Is A Cover Up For Destroying Caribou Habitat

<https://www.vws.org/bc-wolf-cull/> Valhalla Wilderness Society, 2021

The Wolf & The Caribou

<https://tilaiellistairs.ca/blogs/news/thewolfandthecaribou> Blog, Nov 24, 2021, Tilai Ellis-Stairs

2020:

BC government spends \$2 million on wolf cull

<https://www.raincoast.eco/2020/05/bc-government-spends-2-million-on-wolf-cull/> Raincoast, April 5, 2020

The complicated tale of why B.C. paid \$2 million to shoot wolves in endangered caribou habitat this winter

<https://thenarwhal.ca/the-complicated-tale-of-why-b-c-paid-2-million-to-shoot-wolves-in-endangered-caribou-habitat-this-winter/> - The Narwahl, April 25, 2020, Sarah Cox

A Canadian Province Killed 463 Wolves for No Good Reason

<https://www.theatlantic.com/science/archive/2020/07/how-simple-statistical-error-killed-463-wolves/614134/> - The Atlantic, July 14, 2020, Sabrina Imbler

Killing nearly 500 wolves in a year failed to protect endangered caribou – study

<https://www.theguardian.com/environment/2020/jul/14/wolf-culls-do-not-protect-caribou-new-study-shows-aoe> - The Guardian, July 14, 2020, Leyland Cecco

Wolf culls will not save endangered caribou in Western Canada, new study finds

<https://www.cbc.ca/news/canada/british-columbia/wolf-cull-endangered-caribou-western-canada-1.5650167> CBC, July 15, 2020, Hina Alam

Wells Gray Caribou Chronicle: 1954–2020

<https://1000clearcuts.ca/the-rest-of-the-story/> Death by a Thousand Clearcuts, July 30, 2020

2019:

Island Voices: Wolf cull is no caribou solution

<https://www.timescolonist.com/opinion/island-voices-wolf-cull-is-no-caribou-solution-4670887> - Times Colonist, March 17, 2019, Bryce Casavant

Wolf cull image release

Vaughn Palmer: Caribou protection plan generates protests among northern residents

<https://vancouver.sun.com/opinion/columnists/vaughn-palmer-caribou-protection-plan-generates-protests-among-northern-residents> Vancouver Sun, April 10, 2019, Vaughn Palmer

A small town's economy. Endangered caribou. Which do we protect?

<https://www.theguardian.com/world/2019/jul/15/caribou-revelstoke-british-columbia> - The Guardian, July 15 2019, Cassidy Randall

B.C. predator cull would target 80 per cent of wolves in caribou recovery areas

<https://vancouver.sun.com/news/local-news/b-c-predator-cull-would-target-80-per-cent-of-wolves-in-caribou-recovery-areas> - Randy Shore, September 12, 2019

80% of BC wolves could be killed under expansion of controversial program: Group

<https://dailyhive.com/vancouver/bc-wolves-caribou-conservation> - Daily Hive, Sept 20, 2019, Michelle Morton

U.S. lists B.C. caribou as endangered while province approves logging in critical habitat

<https://thenarwhal.ca/u-s-lists-b-c-caribou-as-endangered-while-province-approves-logging-in-critical-habitat/> - The Narwhal, October 4, 2019, Sarah Cox

Wolf culls, caribou protection and habitat management

<https://adamolsen.ca/2019/11/wolf-culls-caribou-protection-and-habitat-management/> - Question Period BC Legislature, November 20, 2019, Adam Olsen

2018:

B.C. decision to cull predators while expanding bighorn sheep hunt blasted by conservationists

<https://www.cbc.ca/news/canada/british-columbia/bighorn-sheep-open-hunt-predator-cull-bc-1.4845480> - CBC, October 1 2018

2017:

Kootenay conservation officers believe someone intentionally poisoning wolves

<https://www.cbc.ca/news/canada/british-columbia/kootenay-wolf-poisonings-1.4121946> - CBC, May 18 2017, Matt Meuse

Forget wolf culls: researcher says more moose and deer hunting would help B.C. caribou

<https://www.cbc.ca/news/canada/british-columbia/bc-caribou-wolf-cull-1.4269660> - CBC, August 13 2017, Liam Britten

Wolf cull image release

Hunt Moose to Save Caribou That Are Killed By Wolves, Scientists Say

<https://www.vice.com/en/article/vbbpk4/hunt-moose-to-save-caribou-that-are-killed-by-wolves-scientists-say> - Vice, August 29, 2017, Jacob Dube

2016:

West coast wolf-cull challenged in court

<https://www.rcinet.ca/en/2016/01/20/west-coast-wolf-cull-challenged-in-court/> - Radio Canada, January 20 2016, Marc Montgomery

B.C. wolf cull critics take fight to court

<https://www.cbc.ca/news/canada/british-columbia/b-c-wolf-cull-critics-take-fight-to-court-1.3411575> - CBC, January 20 2016

Meet the wolves targeted in B.C.'s controversial kill

<https://www.nationalobserver.com/2016/01/22/news/meet-wolves-targeted-bcs-controversial-kill> - National Observer, January 22 2016 by Charles Mandel

B.C. wolf cull needed to save elk and moose, says biologist

<https://www.cbc.ca/news/canada/british-columbia/wolf-cull-save-elk-moose-1.3450522> - CBC, February 16 2016

Controversial helicopter wolf cull underway in northeast B.C.

<https://www.ctvnews.ca/canada/controversial-helicopter-wolf-cull-underway-in-northeast-b-c-1.2785784> - CTV News, February 19 2016

Shocking audio released of wolf cull worker talking about B.C.'s "Judas wolf"

<https://www.nationalobserver.com/2016/02/23/news/audio-released-wolf-cull-worker-talking-about-bc-s-judas-wolf> - February 23, 2016, by Charles Mandel

British Columbia Government Using 'Judas' Wolf in Unethical Hunt, Say Wildlife Advocates

https://www.earthisland.org/journal/index.php/articles/entry/british_columbian_government_using_judas_wolf_in_unethical_hunt/ Earth Island Journal, March 9, 2016, Elizabeth Claire Alberts

163 wolves killed in second year of B.C.'s controversial cull

<https://bc.ctvnews.ca/163-wolves-killed-in-second-year-of-b-c-s-controversial-cull-1.2886672> CTV News, May 3 2016, Andrew Weichel

Wolf advocates angry that state preparing to kill entire pack

<https://www.seattletimes.com/seattle-news/wolf-advocates-outraged-that-state-preparing-to-kill-wolves/> Seattle Times, August 25 2016, Nicholas K. Geranois

Wolf cull image release

'Necessary evil': saving the endangered caribou might mean killing wolves

<https://www.theguardian.com/world/2016/may/13/caribou-endangered-species-act-us-canada>

Vancouver Sun, September 10, 2016, Camille Labchuck, Exec Dir Animal Justice: BC's deadly wildlife policies need a rethink, Opinion

Encounter with Discovery Island's lone wolf sees island closed to tourists

<https://www.cbc.ca/news/canada/british-columbia/discovery-island-wolf-1.3769858> - CBC, September 19 2016, Deborah Wilson

2015:

B.C. Hunting wolves by helicopters to save endangered caribou

<https://globalnews.ca/news/1775813/b-c-hunting-wolves-by-helicopter-to-save-endangered-caribou/> - Global News, January 15 2015, James Keller

Wolf cull commences in West Kootenay

<https://www.nelsonstar.com/news/updated-wolf-cull-commences-in-west-kootenay/> Nelson Star, January 15, 2015, Tamara Hynd

The War on Wolves in Canada's Pacific Northwest

<https://www.vice.com/en/article/kwpvky/the-war-on-wolves-in-canadas-pacific-northwest-853> Vice, February 3, 2015, Sarah MacDonald

B.C. wolf cull will likely last 5 years, assistant deputy minister says

<https://www.cbc.ca/news/canada/british-columbia/b-c-wolf-cull-will-likely-last-5-years-assistant-deputy-minister-says-1.2952556> - CBC, February 11 2015, Chris Brown

B.C. wolf kill a misguided effort to save mountain caribou

<https://www.straight.com/news/401591/anne-murray-bc-wolf-kill-misguided-effort-save-mountain-caribou> - The Georgia Straight, March 2 2015, Anne Murray

B.C. Wolf Cull Petitions and Protests Costs

<https://www.nelsonstar.com/news/bc-wolf-cull-petitions-and-protests/> - Nelson Star, March 13 2015, Tamara Hynd

B.C. Green Party MLA changes positions on controversial wolf cull

<https://www.theglobeandmail.com/news/british-columbia/bcs-green-party-mla-changes-position-on-controversial-wolf-cull/article23486930/> -The Globe and Mail, March 17 2015, Maura Forrest

B.C. Wolf Cull leads to 'removal' of 84 wolves

<https://www.cbc.ca/news/canada/british-columbia/b-c-wolf-cull-leads-to-removal-of-84-wolves-1.3037023> - CBC, April 17 2015

Wolf cull image release

B.C. Controversial wolf cull program to save caribou will continue

<https://www.theglobeandmail.com/news/british-columbia/bc-wolf-cull-program-will-continue/article24496415/> - The Globe and Mail, May 19 2015, Mark Hume

Miley Cyrus targets B.C.'s wolf cull, grizzly hunt in video

<https://www.cbc.ca/news/canada/british-columbia/miley-cyrus-wolf-cull-1.3236655> - CBC, September 21 2015

Wolf-culling policies need updating, Alberta conservationists says

<https://www.cbc.ca/news/canada/edmonton/wolf-culling-policies-need-updating-alberta-conservationists-says-1.3278440> - CBC News, October 19 2015

2014

Canadian grey wolves thriving too much for some in U.S.

<https://www.cbc.ca/news/canada/british-columbia/canadian-grey-wolves-thriving-too-much-for-some-in-u-s-1.2503815> - CBC, January 20, 2014

B.C. releases wolf-population control plan

<https://globalnews.ca/news/1278221/b-c-releases-wolf-population-control-plan/> - Global News, April 17, 2014

Alberta sells off habitat of endangered caribou

<https://globalnews.ca/news/1328679/alberta-sells-off-habitat-of-endangered-caribou/> - Global News, May 13, 2014, Bob Weber

Heavily hunted wolves more stressed, study says

<https://www.timescolonist.com/local-news/heavily-hunted-wolves-more-stressed-study-says-4615788> - Times Colonist, November 12 2014, Sarah Petrescu

Stress affects wolves in hunting grounds, and it may alter their evolution: study

<https://www.theglobeandmail.com/news/british-columbia/stress-affects-wolves-in-hunting-grounds-and-it-may-alter-their-evolution-study/article21562661/> - The Globe and Mail, November 12, 2014

2012

Vancouver Sun, October 12, 2012, Opinion: Cattlemen's call for cull undercut by dubious numbers, letter Gwen Cornfield referring to [Stephen Hume article](#)

Vancouver Sun, November 26, 2012: Wolf kill a poor strategy to manage wildlife. Most of a full page collection of letters regarding the wolf cull

LETTERS

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Wolf kill a poor strategy to manage wildlife

Re: Contest offers prizes for wolf kills, Nov. 20 and Wolf-hunting contest backlash threatens northern tourism, Nov. 21

I carefully read the B.C. government's proposed management plan for the grey wolf.

Killing wolves is the only method proposed to manage a population we don't know much about.

I did a quick Internet search to find out how conflicts between wolves and ranchers are handled elsewhere.

Ranchers in Wyoming and Idaho are changing their practices to reduce wolf predation on livestock without resorting to kills.

Rather than spending tax dollars on killing wolves, I would like to see the B.C. government help ranchers move toward practices that will allow them to coexist with wolves.

Otherwise, we are going to have to keep killing wolves year after year.

It's time to find a better way.

B. COUSINS
Enderby

During the 1970s, a plan was implemented to pay ranchers up to \$500 for each animal killed by predators.

The ranchers brought in the nose so the game warden could estimate the animals age, and a cheque was issued.

After 10 years, taxpayers were paying ranchers about \$50,000, representing about 500 cows and sheep.

In the tenth year the wardens were told to investigate each kill. They found only three animals in B.C. had been killed by predators. Most of the rest had tangled in barbed wire and been chewed on afterwards by vultures.

Although it worked better than culling to reduce predation, and was cheaper, the program was discontinued.

Culling predators causes increased die-offs as ungulates overeat their habitat and/or increases disease in ungulates.

The wolf that eats an occasional sheep also eats thousands of mice, rats and others that compete with sheep for habitat.

JIM ERKILETIAN
Nanaimo

Re: Contest offers prizes for wolf kills, Nov. 20 and Man who killed 56 sled dogs to be sentenced, Nov. 20.

Both articles involve shooting animals. One is deemed cruel to sentence pending while the other is a contest for cash.

Is this the fog of nature?

JANET SHAUNTZ
Delta

The first time I met renowned wolf researcher Paul Paquet, he had to decide whether to have me thrown in jail.

I had deliberately destroyed substantial portions of a research trap line Paul and his team had established in Banff National Park; and, then, wandered the streets of my hometown, waving two of Paquet's leghold traps



NATHAN DENETTE/THE CANADIAN PRESS FILES

Peace River is holding a contest aimed at thinning out the area's wolf population, awarding prizes for the largest killed. Some readers question the need for the kill and the amount of damage the wolves are doing in the area.

in the faces of local residents.

In the ensuing uproar, the RCMP came to my work — I was a reporter at the local newspaper — and threatened to seize the paper's assets until I returned the traps.

It was determined I would meet with Paul to discuss the matter. He patiently explained how critical trapping and radio tracking was to understanding wolves; and the future of these magnificent and vital animals could be determined by science.

I didn't go to jail and Paul got his traps back. He knew what I had done was born from a love for wolves.

A little cautionary tale for Fort St. John hunters Rich Petersen, Guy Lahaye and friends. People will go to extraordinary lengths to protect these animals from the hateful and cowardly "social thing" you shamefully label as a hunt.

Enjoy the backlash folks.

MAX WILKIE
North Vancouver

I am sure many people will write letters expressing outrage. I too am outraged and sickened by this butchery (dressed in the sheep's clothing as "fun"), but I'll allow other letter writers to discuss the inhuman brutality, if not insanity, of this event.

I'd like to comment on the publicity poster mentioned in the article that depicts the stereotypically evil looking, snarling wolf.

Perhaps this poster could have a better, far more accurate and descriptive image instead: That of the stereotypical redneck hick (with the obligatory beer gut and buck teeth), dressed in overalls — holding a sawed-off shot gun? I think this image is far more suitable.

B. KENDALL
New Westminster

The government of B.C.'s management plan for wolves is beyond my comprehension.

How can the wholesale slaughter of a species by any member of the public, regardless of age, (what a wonderful thing to teach our children "look Billy, there's a wolf — can you aim your gun and shoot it for fun?) be called "management"?

If the sole purpose of this plan is to protect the ranchers then the near eradication of a species seems to be overreacting.

And I would suggest re-evaluating the numbers of losses attributed to wolves — they don't make any sense (see Stephen Hume's column, Live Stock Statistics don't justify wolf cull, Oct. 10).

I don't know why so much government policy regarding the "management" of our wildlife seemingly ignores the concerns of not only the general public, but the conservationist's viewpoint.

Instead it is usually overridden by the viewpoint and lobby of those that want to hunt and kill our wildlife.

DAVID MILLER
Coquitlam

Temporary foreign workers worth having and protecting

Re: Temporary foreign workers: Filling labour gap or depressing wages?, Nov. 17

Temporary foreign workers are a necessity. The argument that TFWs are paid less and suppress free wage market conditions, and that they grab

jobs from Canadians and permanent residents, is not grounded in reality.

Service Canada vigorously assesses the requirements of employers and issues a Labour Market Opinion (LMO) on the basis of which an employer can hire a TFW.

It's a pretty comprehensive process requiring employers to actively advertise the positions. The LMO is granted only if there are no permanent residents or Canadian citizens available to fill these positions.

The supply of low skill workers is extremely low not only in Metro Vancouver but in the Interior and northern B.C.

In many instances owners have to close down businesses or curtail working hours due to the shortage of labour. Many retiring owners are unable to sell their businesses as prospective buyers can't find labour.

There are instances when the rights of TFWs have been violated, but that's also true in the case of Canadians and permanent residents.

This is neither desirable nor should it be tolerated. Labour laws should be rigorously implemented and violators punished.

Immigration laws, federally and provincially, require changes.

To become a permanent resident the B.C. Provincial Nominee Program under Strategic Occupations requires the employee to work with the same B.C. employer for nine months and to meet the requirements and criteria on which the original application was approved throughout the application process.

The path to permanent residency of TFWs is employer driven and this leads to exploitation.

Let's not politicize this issue. Let's find ways to improve it.

We are a God-gifted country with an abundance of natural resources that need to be sensibly exploited.

We require tremendous infrastructure development and a boost to small business, and for both we require TFWs.

JATINDER ROSHA
Surrey

According to some unions and economists, TFWs keep wages depressed. That's simply not true in the construction sector and with skilled labour, where new TFWs earn upwards of \$30 per hour in a sector that will take every warm-bodied Canadian it can get.

The problem is not enough Canadian youth are pursuing skilled trades. This is mainly because many of today's parents believe that white-collar professions offer the only choice for lifelong career success.

So that leaves Canada's fast growing construction sector with no option but to hire foreign workers, many of them from countries such as the United Kingdom and Ireland where the local economy is struggling.

The rules of the Foreign Worker Program allow spouses to come to Canada on an open work permit.

Many workers take advantage of this to bring their families with them, and many workers will quickly integrate into society and apply to stay, pay taxes and be part of Canada's future. We should encourage this to happen.

Immigration of skilled labour has and always will be a key component of our economy's success.

DAVID BERRINGTON
Vancouver

A few years ago, for reasons that we were never able to discern, a number of migrant workers from a local greenhouse operation were prohibited from participating in a weekly social event co-sponsored by our church.

Even though the activity was conducted during their non-working hours, they were warned that they would be immediately put on an airplane back to their Central American country with the added threat that they might not even make it home safely.

We shared our concerns with our member of Parliament who informed us that any actions taken would need to be "complaint driven."

When we pointed out that these men had been cowed to the point that there was no likelihood whatsoever they would make any formal complaints, he indicated that the government had no plans to amend this policy.

Notwithstanding that most employers in our country treat their workers with fairness and respect, the reality is that whenever vulnerable people are deemed to be a "resource," some will unjustly take advantage of them.

Governments bear a fundamental responsibility to defend, whenever possible, the vulnerable under their purview from abuse and oppression.

The current "complaint-driven" structure will not provide this protection.

JOHANNES B. KELDER
Abbotsford

Wolf cull image release

2003

Vancouver Sun, March 22, 2003, no byline: Call off the wolf cull in our great wilderness - Let's distinguish between preservation and management and interfere as little as possible in the Muskwa-Ketchika

2002

August 14, 2002 Vancouver Sun, Nicholas Read: Wolf, Cougar Kill Planned for Vancouver Island. Raincoast quote: stone age wildlife management. 30% cull targeted for both wolves and cougars... let the world know what goes on here.

2001

June 2, 2001, Vancouver Sun, Nicholas Read: Wolf Kill Plan Irresponsible. BC Government quoted with population of 8000 wolves in BC 2001 but it's based on 1979 estimates and 800 wolves a year being killed.

1984

November 26, 1984, Vancouver Sun, no byline: Greenpeace Critics Knock Attempt to Join World Group. Paul Watson went up north on Project Wolf to block BC's wolf killing program, said all the culling of wolves, seals, etc. Sealer's Association undermined their attempt to join world wildlife organization.

APPENDIX 2



Reference: 29094

February 24, 2023

[REDACTED]

[REDACTED]

Thank you for your email of December 5, 2022. My apologies in the delayed response.

Your concern regarding sufficient oversight and monitoring of the predator management program that supports the recovery of woodland caribou populations is important. Ensuring high standards of humane treatment of animals is a central expectation of the program.

Woodland caribou recovery is a top priority for the province of British Columbia (the Province). The primary objective of the Caribou Recovery Program is to ensure that caribou herds in BC are recovered to self-sustaining levels, through short-term (e.g., predator management, maternity penning, habitat protection) and long-term (e.g., habitat recruitment and restoration) actions. The Province's approach to predator management is based on science and sound wildlife management principles. The decision to reduce predator populations is not taken lightly, nor is it something done across all caribou herds.

In regard to your concerns about the oversight of humane standards of the Province's wolf reduction programs, we monitor humaneness through multiple controls. The Province follows the American Veterinary Medical Association's *Guidelines for the Euthanasia of Animals* (2020) and the *Guidelines for the Depopulation of Animals* (2019) – which state that gunshot is an acceptable and effective method for humanely killing carnivores and is the preferred method for removing large, free-ranging carnivores from the landscape.

Ministry staff, designated as Officers under the Wildlife Act, provide a high level of oversight during the operations of wolf reduction programs. When aerial methods are used, ministry staff are onboard the helicopter for many of the flights and provide real-time assessments of effectiveness and humaneness. Ministry staff have constant communication with the contractors, other Ministry colleagues, and the Provincial Wildlife Veterinarian throughout the program implementation, thus can quickly address any issues that may arise.

The Animal Care Applications accompany the Wildlife Act permits provide guidance on the procedures used to achieve humaneness during the field delivery of the programs. All personnel involved in these programs are also vetted for skill and experience through multiple steps including: the contract procurement process, a review of Animal Care Applications by the Provincial Wildlife Veterinarian, and a final review by the Regional Manager prior to the issuance of Wildlife Act permits. All personnel are expected to follow these procedures.

I can confirm that Provincial personnel provided direct oversight of the Itcha-Ilgachuz and Tweedsmuir-Entiako on most aerial operations (i.e., on board helicopters) and photographs were not taken. Although, this is not viewed as a violation of the permit provided, we recognize that better data and documentation are necessary to track implementation. We are taking steps to ensure that all staff and contactors are reminded of this expectation and provide alternatives to photographs as field conditions are not always suitable for this approach.

I recognize this is a challenging and controversial management action. The Province will continue to limit aerial control to specific circumstances for the caribou herds most at risk of localized extinction.

I appreciate your sincere concerns. Again, thank you for writing.

Sincerely,

A handwritten signature in cursive script that reads "Lori Halls".

Lori Halls
Deputy Minister
Ministry of Water, Land, and Resource Stewardship