

Feedback Submission on the Proposed Five-Year Extension of the Predator Reduction Program

Submitted to the Ministry of Water, Land and Resource Stewardship, Wildlife and Ecosystems Branch, on behalf of Pacific Wild

Executive Summary

Pacific Wild is a British Columbia-based conservation organization with over two decades of experience in wildlife research, documentation, outreach, and advocacy. We respectfully submit this feedback in response to the Province's engagement process regarding the proposed five-year extension (2026–2031) of the Predator Reduction Program (hereafter referred to as “the Program”), which authorizes the aerial lethal removal of wolves across 15 caribou herd ranges in British Columbia.

We acknowledge the dedication and expertise of the Wildlife Response Unit staff, and we appreciated the opportunity to meet with the Program team in May 2026. That conversation confirmed the complexity and difficulty of caribou recovery, and we are grateful for the openness with which team members engaged our questions. However, following careful review of the information provided, publicly available program reports, freedom of information records, and peer-reviewed literature, Pacific Wild must oppose the proposed five-year extension.

Our position rests on seven interconnected concerns: (1) the program lacks clearly defined, legally binding habitat recovery thresholds that would constitute an exit condition; (2) critical caribou habitat continues to be destroyed at a rate the Program's predator control component cannot address; (3) the government's own spending priorities remain poorly aligned with the acknowledged root cause of caribou decline; (4) the ecological consequences of sustained wolf reduction are inadequately assessed; (5) animal welfare concerns remain unresolved; (6) the consultation process raises questions about meaningful Indigenous engagement and DRIPA compliance; and (7) transparency and public accountability are insufficient given the Program's scale, cost, and controversy, particularly due to the reliance on taxpayer dollars.

We call on the Province to end the Predator Reduction Program and redirect resources toward a habitat-first recovery strategy grounded in legally binding protections, genuine co-governance with Indigenous peoples, and cross-Ministry coordination to complete comprehensive biodiversity accounting. We also urge the Province to instate a public comment period that allows British Columbia taxpayers to exercise their democratic right to provide input on this controversial program.

1. Background and Context

Since 2015, the Province has conducted aerial gunning of wolves across British Columbia under the stated goal of supporting caribou recovery. In the 2025–26 season, 300 wolves and six cougars were killed across 15 treatment areas. To date, the Program has resulted in the lethal removal of more than 2,800 wolves. In addition, thousands of additional wolves are also killed

annually through loosely regulated hunting and trapping in overlapping areas, creating cumulative impacts that are difficult to quantify, according to the Predator Reduction team.

The Program was launched as a short-term emergency intervention while habitat-based recovery actions were purportedly developed and implemented. More than a decade later, the Province is now proposing to extend the cull for an additional five years while habitat destruction continues at a steady pace. During our May 2026 meeting, Ministry staff confirmed that no legally binding habitat recovery threshold or measurable exit criterion exists that would trigger the Program's end. When asked directly whether a specific, measurable habitat recovery threshold would define success and end the Program, the response was: "That's a complex one. It's not a single metric."¹

This absence of an exit strategy is among the most serious deficiencies in the Program as proposed. A recovery program without enforceable endpoints is, in effect, a permanent program that normalizes indefinite predator killing in lieu of the structural changes needed to address habitat destruction.

2. Habitat Loss Remains the Primary Driver of Caribou Decline, Yet Is Not Being Adequately Addressed

2.1 The Science Is Clear

Federal recovery strategies for woodland caribou² identify undisturbed habitat as the foundation of self-sustaining populations. Research consistently shows that habitat fragmentation from logging, mining, oil and gas development, and recreation drives the predator–prey dynamic imbalance that puts caribou at risk. Specifically, early seral forest created by logging and other disturbances supports elevated moose and deer populations, which in turn sustain higher wolf densities, increasing predation pressure on caribou in a phenomenon known as apparent competition.^{3,4}

Ministry staff confirmed this dynamic during our May 2026 meeting, clearly stating that predation pressure on southern mountain caribou is driven primarily by wolf abundance, which in turn is driven by elevated primary prey abundance in disturbed landscapes. This means the predator–prey imbalance the Program is attempting to manage is itself a symptom of habitat destruction. Addressing wolf numbers without addressing the habitat conditions that sustain those numbers is, ecologically speaking, treating the symptom rather than the disease.

¹ (Caribou Recovery Team, personal communication, May 19, 2026)

² Environment Canada. (2014). Recovery Strategy for the Woodland Caribou, Southern Mountain Population in Canada. Species at Risk Act Recovery Strategy Series.

³ Labadie G, McLoughlin PD, Hebblewhite M, Fortin D. Insect-mediated apparent competition between mammals in a boreal food web. *Proc Natl Acad Sci U S A*. 2021 Jul 27;118(30):e2022892118. doi: 10.1073/pnas.2022892118.

⁴ Caroline Gagné, Julien Mainguy, Daniel Fortin. The impact of forest harvesting on caribou–moose–wolf interactions decreases along a latitudinal gradient. *Biological Conservation*. Volume 197, 2016, Pages 215-222. ISSN 0006-3207. Doi: 10.1016/j.biocon.2016.03.015.

Notably, the integrated population model by Lamb et al. (2024)⁵, cited by the Province as evidence of the Program's effectiveness, found that southern mountain caribou abundance declined by 51% between 1991 and 2023, and that 37% of subpopulations were functionally extirpated. Even with intensive intervention, overall abundance continues to fall across the range. The same study warns that unless habitat conservation and restoration become effective, caribou subpopulations will continue to be extirpated.

2.2 Habitat Destruction Continues Unabated

Caribou are listed as "threatened" under the federal *Species at Risk Act* (SARA) and are provincially red-listed. The federal *Recovery Strategy* requires protection of all core critical habitat. Yet clear-cut logging in critical caribou habitat has continued steadily since 2003. Since 2015 the annual amount of caribou habitat lost to clearcut logging has followed an increasing trend. Recently published data shows that 5,713 hectares of old-growth and primary forests are either approved or pending approval for logging across the ranges of three threatened southern mountain caribou herds, with 58% of their combined ranges at risk of logging.^{6,7}

Pacific Wild's GIS mapping analysis shows that 136,229 km² of caribou habitat has been lost to human disturbance, with over 23,700 km² attributable to forest practices alone. Figure 2 illustrates annual patterns identified through Pacific Wild's analysis of publicly available government data.

⁵ Lamb, Clayton T., Sara Williams, Stan Boutin, Michael Bridger, Deborah Cichowski, Kristina Cornhill, Craig DeMars, et al. 2024. "Effectiveness of Population-Based Recovery Actions for Threatened Southern Mountain Caribou." *Ecological Applications*, 34(4): e2965. <https://doi.org/10.1002/eap.2965>

⁶ Stand.Earth. (2025). Old Growth Logging in Endangered Caribou Habitat: Analysis presented by Stand.earth, Wilderness Committee, Wildsight.

<https://stand.earth/forest-eye/2025/06/23/old-growth-logging-in-endangered-caribou-habitat/>

⁷ In addition, Griffin et al. (2025) warn that mountain pine beetle outbreaks, which are becoming more severe under climate change, are an additional compounding threat to caribou habitat that requires early detection and proactive management. No amount of wolf killing can compensate for the continued destruction and fragmentation of the old-growth ecosystems that caribou depend on. Research by Gable et al. (2024) on wolf-prey dynamics in boreal systems similarly shows that winter severity and habitat conditions, rather than wolf predation alone, are the primary drivers of ungulate population dynamics. Nagy-Reis et al. (2021) found that caribou habitat loss has accelerated over time, linear features have increased, and minimal restoration has occurred. They conclude that "short-term recovery actions such as predator reductions and translocations will likely just delay caribou extinction in the absence of well-considered habitat management" (p.1).

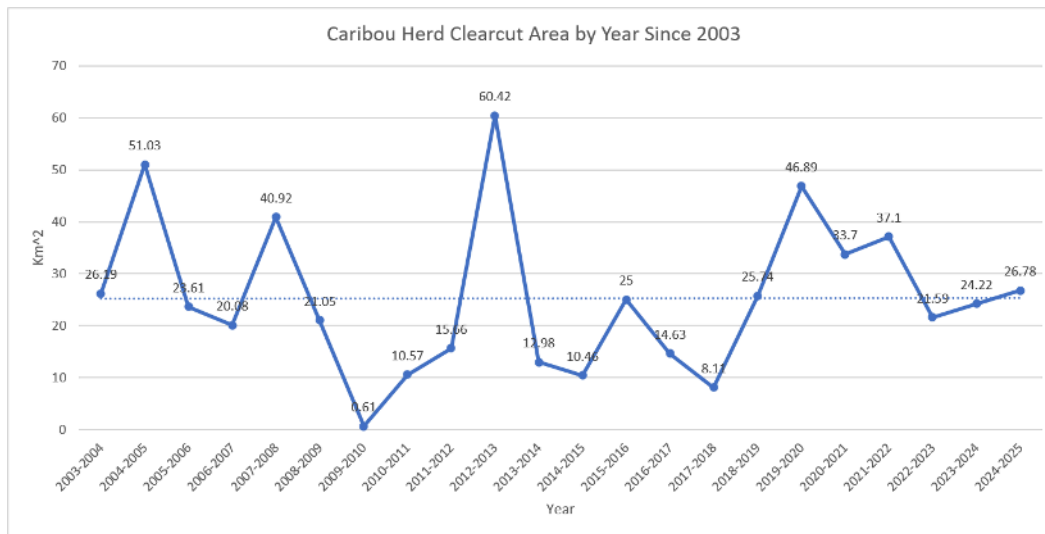


Figure 1. Annual area of clearcut logging within caribou herd ranges, 2003–2025 (not accounting for the suggested 500m buffer zone). Overall rates of habitat loss have remained relatively unchanged since 2003, resulting in the removal of 557.34 km² of forest within caribou herd areas. NOTE: this does not represent the full scale of habitat disturbance caused by roads, and other linear features or by other extractive industries like mining.

Analysis compiled by Kevin Lester, GIS Specialist. Data source: British Columbia Data Catalogue: Harvested Areas of BC (Consolidated Cutblocks).

<https://catalogue.data.gov.bc.ca/dataset/harvested-areas-of-bc-consolidated-cutblocks->

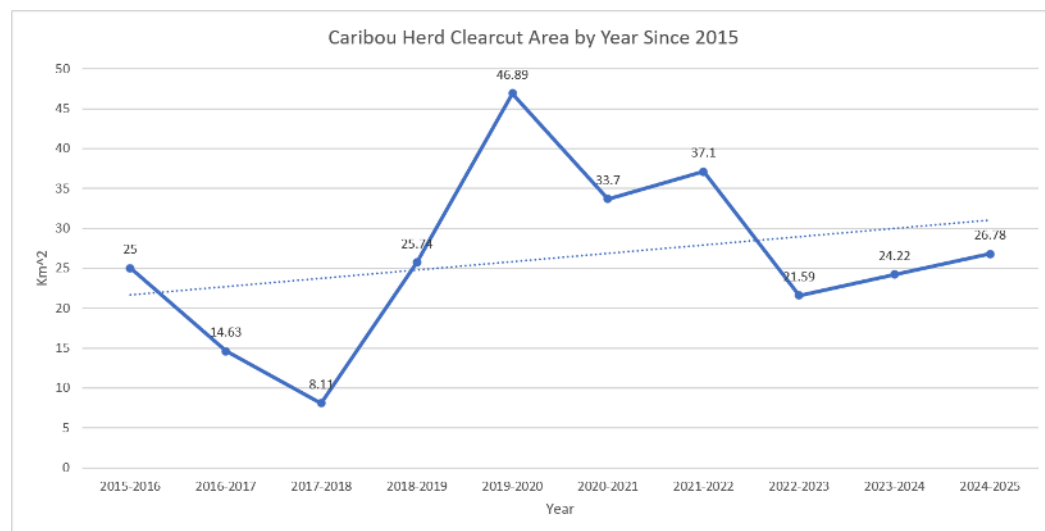


Figure 2. Annual area of clearcut logging within caribou herd ranges, 2015–2025 (not accounting for the suggested 500m buffer zone). Trend analysis indicates an increase in habitat loss over the study period, although the relationship is weak and not statistically significant ($R^2 = 0.08$). Since 2015, a total of 263.76 km² of forest has been clearcut within caribou herd areas. NOTE: this does not represent the full scale of habitat disturbance caused by roads, and other linear features or by other extractive industries like mining. Analysis compiled by Kevin Lester, GIS Specialist. Data source: British Columbia Data Catalogue: Harvested Areas of BC (Consolidated Cutblocks).

<https://catalogue.data.gov.bc.ca/dataset/harvested-areas-of-bc-consolidated-cutblocks->

The Wilderness Committee found that only approximately one-third of the critical habitat needed to support Columbia North caribou recovery is currently protected, despite the federal Southern Mountain Caribou Recovery Strategy's recommendation that 100% of core habitat be protected. Further highlighting ongoing gaps in caribou recovery efforts, the Wilderness Committee and two partner organizations are currently suing the federal government over its failure to complete critical habitat mapping for caribou, a legal obligation that has remained unmet for more than 11 years.⁸

During our May 2026 meeting, Ministry staff acknowledged that a news article⁹ about logging proceeding in an area the Program had flagged as critical “speaks for itself” and confirmed this is “a challenge we’re facing across several of these caribou herds.”¹⁰ This inter-ministerial disconnect, where the Ministry of Forests approves logging that the Caribou Recovery Program identifies as harmful, is a structural problem that predator reduction cannot solve.

2.3 Investment in Habitat Restoration Is Disproportionately Low

Between 2017 and 2023, the Province invested approximately \$2.53 million in direct habitat restoration within the Caribou Recovery Program, compared to approximately \$10.2 million on predator reduction over a similar period. This four-to-one spending imbalance directly contradicts the stated scientific understanding that habitat disturbance is the root cause of caribou decline.

A 2025 study by Maltman et al.¹¹ demonstrates that targeted tree planting in woodland caribou habitat across B.C. presents a major co-benefit opportunity, simultaneously advancing wildlife conservation and climate mitigation. Ecotypes in the Southern Mountain herd region showed the greatest potential, with high carbon sequestration productivity and minimal trade-offs when caribou habitat restoration is prioritized. We are encouraged to see individual caribou habitat restoration projects funded by entities such as the Habitat Conservation Trust, but investment in restoration must be scaled up to deliver lasting ecological, climatic, and economic returns that predator reduction cannot provide.

3. Concerns About the Scientific Basis for Program Continuation

3.1 Population Increases Are Conflated with Predator Control Effectiveness

The Province points to population stabilization and growth in 12 of 15 treatment herds as evidence of the Program’s effectiveness. We acknowledge that predator reduction may have

⁸ Environmental groups sue Ottawa over decade-long failure to map B.C. caribou habitat.
<https://www.biv.com/news/economy-law-politics/environmental-groups-sue-ottawa-over-decade-long-failure-to-map-b-c-caribou-habitat-11858015>

⁹ B.C. allowed logging in caribou habitat despite its own ministry’s recommendation.
<https://cheeknews.ca/b-c-allowed-logging-in-caribou-habitat-despite-its-own-ministrys-recommendation-1324965/>

¹⁰ (Caribou Recovery Team, personal communication, May 19, 2026)

¹¹ Maltman, J.C. et al. (2025). Climate change mitigation through woodland caribou (*Rangifer tarandus*) habitat restoration in British Columbia. *Environmental Research: Ecology*, 4(2), 025004.
<https://doi.org/10.1088/2752-664X/adc0aa>

contributed to these short-term outcomes in some herds. However, we are concerned that the Province presents these results as validation of predator reduction without adequately accounting for the confounding role of other simultaneous interventions.

The most-cited success cases — Kennedy Siding, Burnt Pine, and Quintet — all received a suite of recovery actions simultaneously: wolf reduction, maternal penning (led by Sauteau and West Moberly First Nations since 2014), supplemental feeding (led in partnership with McLeod Lake Indian Band since 2015), recreation restrictions, and significant habitat protection. Ministry staff confirmed this multi-lever approach during the May 2026 meeting. Attributing population growth primarily to predator reduction in these cases is not scientifically defensible.

Furthermore, the Program cites misleading data to support continued predator reduction. The purported 52% increase in Southern Mountain caribou populations reported in Lamb et al. (2024) is relative to a no-intervention simulation scenario, rather than observed herd data or alternative management strategies. The study further notes that wolf reductions applied in isolation are associated with only a modest increase in population growth of approximately 11%. Additionally, the cited ~1,500 increase in caribou from the Lamb et al. (2024) study includes caribou subpopulations in Alberta, Washington and Idaho.¹² B.C.'s caribou population increase would be less.

3.2 Data Gaps and Uncertainty Are Understated

During our meeting, Ministry staff acknowledged significant uncertainty in population estimates for smaller caribou herds, noting that in some cases the population is so small that a single missed survey could change the trend assessment from declining to stable or increasing. The Central Selkirk herd was specifically cited: “You could say it’s stable, you could say it’s declining, you could say it’s increasing”¹³ based on survey conditions. This level of uncertainty should be acknowledged prominently in Program justification documents.

We also note that the wolf density estimates used to justify the Program are based in part on an aerial survey methodology conducted during predator reduction operations. Staff acknowledged that hunters’ and trappers’ kills in the same areas are not incorporated into density calculations, introducing a potential undercount of total wolf mortality and an overcount of remaining wolf density.

Freedom of information (FOI) records obtained by Pacific Wild reveal caribou necropsy data that may complicate the Program’s central premise: of approximately 21 necropsies examined, only around 13% identified wolves as the likely cause of death.¹⁴ Ministry staff explained in our meeting that many of these necropsies occurred after predator reduction was underway, and that pre-reduction mortality investigations showed much higher rates of wolf predation, citing 78% for confirmed mortalities in the Central Mountain population pre-program. This is yet another instance where data has been presented in a way that exaggerates the impact of wolf

¹² B.C. Caribou Recovery Program. (2026). Proposed Continuation of Predator Reduction to Support Caribou Recovery [presentation slides]. Ministry of Water, Land and Resource Stewardship.

¹³ (Caribou Recovery Team, personal communication, May 19, 2026)

¹⁴ Pacific Wild. (2025). FOI Findings: Unveiling Hidden Truths of the B.C. Wolf Cull. pacificwild.org

predation: in a follow-up email, Program staff confirmed that the government report where this statistic is cited states, “Wolf predation accounted for 38% of all documented caribou mortalities, and 78% of all cases *in which a conclusive cause of mortality was determined* [emphasis added] (Seip and Jones 2014).”¹⁵ Seip and Jones reported that 25 out of 61 documented caribou deaths could be definitively attributed to wolves; the report also states that causes of calf mortality were not studied. We welcome clarification on the completeness of the FOI records and request the Province make pre-reduction mortality data more accessible for independent review.

We are also concerned that the Program claims to be informed by science and Indigenous knowledge, yet appears to favor its own internal research findings while ignoring not only a number of recent peer-reviewed studies, such as those citing limited effectiveness of wolf reduction in some habitat types¹⁶ and those suggesting functional restoration and other alternatives to wolf killing can increase caribou numbers^{17,18,19}, but also the direct observations of some Indigenous communities.²⁰

3.3 No Clear, Measurable Exit Criteria Exist

Effective adaptive management requires not only monitoring and feedback mechanisms but also pre-defined criteria for modifying or ending an intervention. When we asked the Province to identify specific, measurable habitat recovery thresholds that would end the Program, staff were unable to provide them. This is not a criticism of individual biologists, who work within policy constraints, but it is a serious gap in Program design that does not meet adaptive management standards.

Without defined endpoints tied to habitat recovery metrics, including a demonstrable reduction in early seral habitat within treatment areas, a documented decline in primary prey abundance (moose, deer), or a measurable reduction in wolf density attributable to habitat change rather than culling, the Program has no principled path to conclusion. The proposed five-year extension continues this indefinite status quo.

¹⁵ Bridger, M. (2019). South Peace caribou recovery following five years of experimental wolf reduction. British Columbia Ministry of Forests, Lands, Natural Resource Operations and Rural Development. https://www2.gov.bc.ca/assets/gov/environment/plants-animals-and-ecosystems/wildlife-wildlife-habitat/caribou/south_peace_caribou_recovery_following_five_years_of_experimental_wolf_reduction.pdf

¹⁶ Gharajehdaghpour, T., M. Auger-Méthé, and A. Cole Burton. 2026. Neonate mortality in mountain caribou: Patterns of predation during onset of a wolf reduction program. *Journal of Wildlife Management* 90:e70143. <https://doi.org/10.1002/jwmg.70143>

¹⁷ R. Serrouya, M. Dickie, C. DeMars, M.J. Wittmann, S. Boutin. Predicting the effects of restoring linear features on woodland caribou populations. *Ecological Modelling*. Volume 416, 2020, 108891, ISSN 0304-3800. <https://doi.org/10.1016/j.ecolmodel.2019.108891>.

¹⁸ Dickie, M., Bampfylde, C., Habib, T.J., Cody, M., Benesh, K., Kellner, M., McLellan, M., Boutin, S. and Serrouya, R. (2023), Where to begin? A flexible framework to prioritize caribou habitat restoration. *Restor Ecol*, 31: e13873. <https://doi.org/10.1111/rec.13873>

¹⁹ Keim, Jonah L. et al. Managing animal movement conserves predator–prey dynamics. *Front Ecol Environ* 2021; 19(7): 379–385, doi:10.1002/fee.2358

²⁰ Muir, B. R., and J. Richert. 2025. ““Walk the Land, Before You Talk About the Land”: TEK-Based Conservation Monitoring Invalidates Caribou Extirpation Status Assigned by British Columbia and Canada.” *Conservation Letters* 18, no. 5: e13152. <https://doi.org/10.1111/conl.13152>

4. Ecological Justification for Wolf Reduction Is Inadequate

Wolves are a keystone predator whose presence shapes ecosystem structure through top-down trophic cascades or bottom-up habitat and climate strictures.^{21,22,23} In cases of top-down control, scientific research across multiple ecosystems demonstrates that the removal of apex predators can trigger cascading effects: prey species populations increase, vegetation is overbrowsed, and overall biodiversity can decline.²⁴ In cases of bottom-up control, a prey population is limited by malnutrition and lowered birth rate because its numbers are bumping up against this ceiling, in which case removing predators will have no net effect.²⁵ In this situation the two potential mortality factors – predators and habitat – are compensatory to one another, meaning losses from predators are replaced by losses of habitat, which makes killing of wolves ineffective to caribou recovery.²⁶ Specific data on caribou such as physical condition, cow-calf ratios, and habitat assessment are necessary to rule out bottom-up caribou control. We are not aware of the Caribou Recovery Program ever having completed such an assessment. The Province's Program documentation does not include a comprehensive ecosystem-level assessment of these effects.

During our May 2026 meeting, Ministry staff confirmed that the Program monitors moose population responses to wolf reduction and has observed moose increases in three to four of the treatment herd ranges surveyed. This moose increase is an acknowledged outcome of wolf reduction, and this elevated moose density has poorly characterized ecosystem consequences, including potential vegetation impacts, habitat degradation for other species, and disease transmission risks. The Project team acknowledged that reducing moose populations would lessen the need for wolf reductions in several herd areas,²⁷ but cited pushback from some First Nations, recreational hunters, and commercial hunting outfitters as a challenge. This line of

²¹ William J. Ripple, Robert L. Beschta, Christopher Wolf, Luke E. Painter, Aaron J. Wirsing. The strength of the Yellowstone trophic cascade after wolf reintroduction. *Global Ecology and Conservation*, Volume 58, 2025, e03428, ISSN 2351-9894. <https://doi.org/10.1016/j.gecco.2025.e03428>.

²² Theberge JB and DA Gauthier. 1985. Models of wolf-ungulate relationships: when is wolf control justified? *Wildl Soc Bulletin*. 13:449–458.

²³ Borg, B.L. and D.W. Schirokauer. 2022. The role of weather and long-term prey dynamics as drivers of wolf population dynamics in a multi-prey system. *Frontiers of Ecological Evolution* 10:791161.

²⁴ In British Columbia's context, habitat degradation from logging, road-building, and forest fragmentation has reduced the environmental carrying capacity for caribou and other ungulates. Biologists and policymakers broadly agree that habitat loss, not wolf predation, is the primary driver of caribou decline, yet this understanding has not been adequately reflected in wildlife management policy. Given that wolf killing can be either harmful to ecosystem stability (in a top-down system) or simply ineffectual (in a bottom-up system), the scientific case for continuing large-scale wolf culling programs is unfounded. Studies also show that wolves preferentially target diseased animals, playing a role in controlling illnesses such as chronic wasting disease, a growing problem across North America. Culling wolves reduces genetic diversity and increases the risk of inbreeding. Adding to this complexity, White et al. (2026) is the first study to document wolves and cougars hunting feral horses in west-central B.C., finding that this non-native prey source may sustain predator populations and increase predation pressure on caribou — a complexity the Province's cull approach ignores.

²⁵ Vucetich, J.A. and R.O. Peterson. 2004. The influence of top-down, bottom-up and abiotic factors on the moose (*Alces alces*) population of Isle Royale. *Proc. Biol. Sci* Jan 22;271(1535):183-189 doi:10.1098/rsbp.2003.2589

²⁶ Ray, J.C., K.H. Redford, R.S. Steneck, and J. Berge 2005. Chapter: Detecting top-down versus bottom-up regulation of ungulates by large carnivores: Implications for conservation of biodiversity. In: book *Large Carnivores and the Conservation of Biodiversity* pp.342-36. Island Press Publishers.

²⁷ McLellan, B. et al. (2025). Restoring historical moose densities results in fewer wolves killed for woodland caribou conservation. *Journal of Wildlife Management*. <https://doi.org/10.1002/jwmg.22673>

reasoning is problematic and hypocritical: why does the Program respond to opposition against increasing moose harvest, while simultaneously ignoring the significant pushback from First Nations, scientists, and B.C. constituents against the wolf cull?

We also raised the issue of chronic wasting disease (CWD) during our meeting, noting that it has been detected in the Cranbrook area. Staff acknowledged the concern but confirmed the Program does not currently incorporate CWD risk into its decision framework. Given that elevated ungulate densities are a known factor in CWD spread, and that wolf reduction elevates ungulate densities, this is a significant oversight with potentially devastating consequences. Similarly, program documentation does not assess the role of wolves in limiting disease spread through selective predation²⁸ of weakened animals.

Research on wolf-mediated trophic interactions suggests that wolf removal in boreal forests can reduce net ecosystem productivity by allowing moose populations to increase browsing pressure on deciduous vegetation; this can alter forest composition, reduce leaf litter inputs, and diminish the ecosystem's capacity to store carbon.²⁹ Given that caribou habitat restoration and carbon sequestration are proposed co-benefit opportunities, the carbon implications of maintaining elevated wolf removal deserves explicit consideration.

5. Animal Welfare Concerns Remain Unresolved

5.1 Methods and Oversight

Wolves in the Program are shot from helicopters using high-capacity, rapid-fire weapons. Freedom of information (FOI) records reviewed by Pacific Wild reveal the use of bait piles, GPS-collared “Judas wolves” used to locate and eliminate entire packs, and game cameras utilized within the Program to locate and exterminate wolves. These methods would be illegal for members of the public to use as a hunting or trapping strategy under B.C. law.

During our meeting, Ministry staff provided context for some of these practices. For example, they explained that extended magazines are used to enable faster follow-up shots and maximize the humaneness of kills. However we’ve also heard from experts in predator control, that semi-automatic, high capacity weaponry is less accurate than lower-capacity shotguns. We accept that staff approach this work with genuine concern for animal welfare. However, in the absence of systematic, publicly available documentation, including video, photographs, or detailed field reports of wolf kills, there is no means for independent verification of compliance with the Province’s own standard operating procedures.

In an interview with Global News in 2022, Jennifer Woods, an Alberta-based certified animal welfare auditor and livestock handling animal care specialist said activists’ calls for greater oversight are not unprecedented or unreasonable. “We trust, but verify [...] you need to verify that those standards are being met.”

²⁸ Wild MA, Hobbs NT, Graham MS, Miller MW. The role of predation in disease control: a comparison of selective and nonselective removal on prion disease dynamics in deer. *J Wildl Dis.* 2011 Jan;47(1):78-93. doi: 10.7589/0090-3558-47.1.78. PMID: 21269999.

²⁹ Wilmers, C.C. & Getz, W.M. (2016). Effects of gray wolf-induced trophic cascades on ecosystem carbon cycling. *Ecosphere*, 7(10). <https://doi.org/10.1002/ecs2.1501>

Staff also acknowledged that photos previously disclosed through FOI were used to question the humaneness of shooting placement (including shots to the lung, chest, and neck), and that the Province felt those photos were “used against [them]” without context. We understand this concern and recognize the sensitivity involved. However, the solution to this dynamic is greater transparency, not less. We welcome a structured process through which Pacific Wild and other organizations could receive annotated operational documentation with Ministry context, rather than relying solely on decontextualized FOI disclosures.

In previous communications, we brought attention to evidence that the Program had violated its own *Wolf Reduction Procedure Manual* by not following its Decision Matrix.³⁰ In 2026, the Program’s *Caribou Recovery Program Wolf Reduction Procedure Manual* was updated, including a re-wording of the Decision Matrix. This change reflects an apparent government preference for revising policy language and decision frameworks rather than addressing underlying procedural flaws and non-compliance.

Even according to the updated Matrix, the Program appears to be violating its own policy, which prohibits implementing predator reduction for a given herd unless “effective habitat recovery or protection measures are planned or are being implemented within the boundaries of the caribou herd p. 4, Wolf Reduction Procedure).” At least eight out of the fifteen caribou herd ranges have disturbance levels ranging well above the threshold set out in the National Recovery Strategy for Woodland Caribou, identified as “65% undisturbed habitat in a range as the disturbance management threshold, and logging within caribou herds has not slowed, yet herd-by-herd plans for habitat recovery and protection have not been made public. At this stage, a promise to protect or recover caribou habitat is not enough, effective implementation is long overdue.

5.2 Independent Condemnations

³⁰ Analysis of the 2023–24, 2024–25, and 2025–26 predator reduction seasons reveals apparent non-compliance in at least one clear case: wolf reduction occurred in the Central Selkirks herd range despite provincial reporting stating the herd is “at imminent risk of becoming functionally extirpated” — a condition that, under the Decision Matrix, requires no wolf reduction. Furthermore, since predator reduction began in that range in 2019, there have been no documented adult female caribou mortalities attributable to wolf predation, casting serious doubt on the finding that wolves are a limiting factor for this herd, as required by the matrix. In addition: wolf population data is too uncertain to confidently rule out long-term harm to wolf populations. The Province’s own Decision Matrix requires that wolf reduction not proceed unless it can be demonstrated that it “would pose a minimal threat to the long-term viability of wolves in the area” (p. 4). Yet at the December 2025 Caribou Recovery Program stakeholder meeting, participants were informed that no province-wide wolf population survey is planned due to time and financial constraints. The most recent province-wide wolf population estimate (Anderson & Mowat, 2025) dates to 2022, relies on ungulate prey biomass modelling, and carries uncertainty ranges of approximately $\pm 23\%$. A comprehensive province-wide wolf census has never been conducted. Over 9,800 wolves have been removed since 2015 through culling and hunting combined, a number equivalent to more than the entire estimated provincial population in 2011 (Kuzyk and Hatter 2014). Under the Decision Matrix, this uncertainty alone requires further assessment before the Program should continue.

The BC SPCA³¹ and the Union of British Columbia Indian Chiefs (UBCIC) have both publicly condemned the Program as inhumane and ineffective.³² These are not marginal voices, they represent significant constituencies within B.C. civil society. In addition, multiple public surveys and studies, including the B.C. government's own public engagement survey, show that the majority of British Columbians are against predator reduction as a method of wildlife management — and specifically killing wolves.^{33,34,35}

5.3 Absence of Wildlife Protections in Law

British Columbia's *Prevention of Cruelty to Animals Act* does not extend protections to wildlife. This means there is no legislated standard of humane treatment that applies to wolves killed under the Program. The Province's internal operating procedures fill this gap administratively, but administrative guidelines can be changed without public process and do not carry the same accountability as law. We recommend the Province commit to legislative reform as a precondition for any future extension.

Creating a Biodiversity Law as part of the implementation of the Biodiversity and Ecosystem Health Framework will also help protect woodland caribou and other species like wolves for the current pitfalls of competing Ministry objectives and instead prioritize the goals of true species recovery.

6. Indigenous Consultation and DRIPA Compliance

The Province has legal obligations under the *Declaration on the Rights of Indigenous Peoples Act* (DRIPA) to engage in meaningful consultation and, where appropriate, shared decision-making with Indigenous peoples. During our meeting, Ministry staff described a consultation process involving formal letters through a provincial portal, virtual open house sessions, and one-on-one meetings with approximately 10–12 First Nations.

We note several concerns with this process as described:

- The consultations are conducted primarily with lands department staff rather than community members, limiting representative input and potentially excluding traditional knowledge holders, Elders, and community members who may have distinct

³¹ BCSPCA Position Statement on Predator Control.

<https://spca.bc.ca/programs-services/leaders-in-our-field/position-statements/position-statement-predator-control/>

³² UBCIC Resolution 2022-09 "Support for BC First Nations' Territorial Management and Protection of Caribou and Wolf Populations".

https://pacificwild.org/wp-content/uploads/2022/03/2022March_Resolution202209_UBCICtoBC.pdf

³³ Sara Dubois & H. W. Harshaw (2013): Exploring "Humane" Dimensions of Wildlife. *Human Dimensions of Wildlife: An International Journal*, 18:1, 1-19

³⁴ Predator Reduction for Caribou Recovery Engagement Survey: What We Heard. Final Report - December 2021. Prepared for: BC Ministry of Forests, Lands, Natural Resource Operations and Rural Development. Prepared by: R.A. Malatest & Associates Ltd.

³⁵ New Poll Shows B.C. Residents Want Stronger Protections for Wolves. February 10, 2026. <https://pacificwild.org/new-poll-shows-b-c-residents-want-stronger-protections-for-wolves/>

perspectives on predator-prey relationships and wildlife governance. In addition, consulting solely with elected chiefs and Council for Nation decision-making is inherently problematic as it is a colonial mechanism imposed on First Nations.

- We heard from the Province that views within and among First Nations are diverse, and that some Nations support the Program while others oppose it. This heterogeneity must be respected. No Nation's opposition should be overridden by the support of other Nations, nor should the Province characterize regional support as offsetting specific Nations' concerns about culling wolves in their territories.
- The engagement timeline is compressed: the Province began outreach in mid-April 2026 with feedback requested by mid-June, while the comprehensive program summary report — which Pacific Wild identified as essential to providing meaningful feedback — will not be publicly released until *after* the feedback deadline. Providing feedback on a program extension without access to a full program summary is not meaningful consultation with First Nations or other stakeholders.

DRIPA requires the Province to move toward genuine co-governance of wildlife decisions with Indigenous peoples. The current consultation model, in which the Province develops a proposal, presents it to Nations for feedback, and then makes a permit decision through a regional director, falls short of this standard. While we applaud the few Indigenous-led efforts to support caribou recovery,³⁶ this approach should be adopted at a systematic, provincial scale. Many First Nations are witnessing ongoing destruction of caribou habitat in their territories at the hands of government-sanctioned industrial old-growth logging. In the absence of Provincial action to protect threatened caribou, the Syilx Okanagan Nation this month formally petitioned the federal government to step in with an emergency order under Canada's Species at Risk Act.³⁷ We urge the Province to develop a shared decision-making framework for the Program as part of any continuation.

7. Transparency and Public Accountability

7.1 Publication of Program Reports and Data

During our meeting, Ministry staff confirmed that a comprehensive Program summary report for 2026, covering the last ten and five years of predator reduction activity, has been completed but must pass through the government communications department before public release. This report was not available during the engagement period. We strongly urge the Province to release this report immediately and to extend the feedback period to allow for thorough review by all stakeholders.

³⁶ Lamb, Clayton T., Roland Willson, Carmen Richter, Naomi Owens-Beek, Julian Napoleon, Bruce Muir, R. Scott McNay, Estelle Lavis, Mark Hebblewhite, Line Giguere, Tamara Dokkie, Stan Boutin, and Adam T. Ford. 2022. "Indigenous-Led Conservation: Pathways to Recovery for the Nearly Extirpated Klinse-Za Mountain Caribou." *Ecological Applications* 32(5): e2581. <https://doi.org/10.1002/eap.2581>

³⁷ Cox, Sarah. Will Canada Issue an Emergency Order to Protect Caribou?. The Tyee. <https://thetyee.ca/News/2026/06/02/Will-Canada-Issue-Emergency-Order-Protect-Caribou/>

We requested during the meeting that pre- and post-reduction wolf density estimates for each treatment area, including numbers remaining after culling, be made more accessible. Staff indicated this information is in annual program reports but acknowledged it is not consolidated. We request this data be synthesized into an accessible format as part of the engagement package.

We request that an environmental impact assessment be made on the potential ecosystem effects of removing wolves. We expect the government to honour their own Decision Matrix and ensure that wolf reduction can take place only if “effective habitat recovery or protection measures are planned or are being implemented within the boundaries of the caribou herd.” So far we have not seen evidence that this guideline is being adequately followed.

We requested a list of organizations and parties engaged in the consultation process. Ministry staff indicated they would check whether this could be shared. We reiterate this request. Understanding who has been engaged, and who has not, is necessary for evaluating whether the consultation process meets a meaningful standard.

7.2 Reporting Gaps

There are currently no mandatory reporting requirements for wolves killed outside Regions 1 and 2 through hunting and trapping. Between 2015 and 2024, in the regions where culling was taking place, 6,738 wolves were reported as killed by hunters and trappers, but this total is from voluntary self-reporting only. This means the Program operates in parallel with a largely unquantified and unmonitored additional mortality source for wolves. Without comprehensive mortality accounting, the Province cannot accurately assess the cumulative impact of the Program on wolf populations or make credible claims about wolf density management.

8. Policy and Legal Gaps

Multiple critical policy safeguards that would underpin responsible wildlife management remain absent or unimplemented:

- A “no net-loss” policy does not exist for critical caribou habitat outside existing protected areas, meaning development approval processes can continue to approve habitat destruction without offset or mitigation obligations.
- The *Draft Biodiversity and Ecosystem Health Framework* has not been implemented with legal accountability, binding objectives, or regular public reporting, leaving ecosystem health considerations advisory rather than enforceable.
- Limited Entry Hunting (LEH) of caribou continues, with over 1,053 tags tentatively allocated in 2026, despite caribou being listed as a threatened species under SARA and a Priority 2 species under the B.C. Conservation Framework. This is inconsistent with the urgency the Program purports to address and ignores the importance of genetic diversity in caribou recovery.
- Wolves have no mandatory reporting requirement outside two regions and no provincial harvest limits in most of B.C., creating a situation where the Program’s carefully

managed wolf density reductions are potentially undermined by unmonitored hunting and trapping mortality in the same areas.

- The Province's *Caribou Recovery Strategy* (November 2024)³⁸ identifies habitat as a priority but does not specify which herds will receive protection, over what timeline, or with what accountability mechanisms. Without enforceable habitat commitments, predator reduction cannot be justified as a bridge to habitat recovery because there is no confirmed bridge to build toward.

9. Questions Requiring Written Responses

Based on our May 2026 meeting and our review of Program documentation, we request written responses to the following questions as part of the Province's engagement process:

- **Exit criteria:** What specific, measurable, and publicly documented thresholds — in terms of habitat recovery, primary prey abundance, and wolf density — would trigger a reduction or cessation of predator reduction in each treatment area? Will these be legally codified?
- **Habitat spending commitment:** What is the Province's committed budget for habitat restoration, and estimated kilometers to be restored, within threatened caribou ranges over the proposed five-year extension period, and how will expenditure be tracked and reported publicly?
- **Inter-ministerial coordination:** What mechanism exists to prevent the Ministry of Forests from approving logging in areas identified by the Caribou Recovery Program as core and critical habitat, and will this mechanism be formalized?
- **Cumulative wolf mortality:** What is the Province's estimate of total annual wolf mortality across B.C. from all sources (Program culling, hunting, trapping), and how is this accounted for in wolf density and population assessments?
- **Ecosystem impacts:** Has the Province conducted or commissioned an independent ecosystem-level assessment of the effects of wolf reduction on biodiversity, ungulate populations, vegetation, and disease risk? If not, will one be commissioned before the extension is granted?
- **DRIPA compliance:** How does the Province intend to move from consultation toward co-governance of wildlife decisions, as required under DRIPA? Will a shared decision-making framework be developed for this Program?
- **Animal welfare documentation:** Will the Province commit to a structured, annotated documentation disclosure process that allows independent organizations to assess operational compliance with humane standards, in dialogue with Ministry staff?
- **Caribou hunting:** How does the Province justify allocating over 1,000 LEH caribou tags in 2026 while simultaneously spending millions to recover a species it acknowledges is threatened, without considering the importance of maintaining genetic diversity and the potential for future translocation from healthy herds?

³⁸ BC Ministry of Water, Land and Resource Stewardship. (2024–25). Predator Reduction to Support Caribou Recovery: 2024–25 Summary. Province of British Columbia.

10. Recommendations

Pacific Wild calls on the Government of British Columbia to:

- End the predator reduction program and commit to a recovery strategy grounded in habitat protection and restoration, including a legally binding “no net-loss” policy for critical caribou habitat across all 15 treatment herd ranges.
- Dramatically and immediately increase investment in direct habitat restoration in proportion to the scale of disturbance documented across caribou herd ranges.
- Implement the *Draft Biodiversity and Ecosystem Health Framework* with legal accountability, binding habitat objectives, and regular, transparent public reporting.
- Formally list southern mountain caribou as endangered under the *Wildlife Act*, implement an immediate moratorium on non-Indigenous caribou hunting, and rescind LEH tags until herds are demonstrably self-sustaining.
- Amend the *Prevention of Cruelty to Animals Act* to include wildlife, establishing enforceable, legislated humane standards for all government wildlife management programs.
- Develop a co-governance framework with Indigenous peoples for wildlife decisions in caribou ranges, moving beyond consultation to shared decision-making as required by DRIPA and the *UN Declaration on the Rights of Indigenous Peoples* (UNDRIP).
- Commission an independent, peer-reviewed ecosystem impact assessment of the Program’s effects on biodiversity, disease risk, trophic dynamics, and carbon cycling as a prerequisite for any future extension consideration.
- Establish mandatory reporting requirements for wolf kills province-wide to enable comprehensive mortality accounting.
- Create an independent, diverse advisory panel that includes ecologists, ethicists, Indigenous knowledge holders, and non-consumptive stakeholders to provide ongoing, transparent oversight of caribou recovery decisions.
- *At minimum*, release the completed Program summary report immediately, extend the feedback deadline accordingly, and open a public comment period with at minimum four weeks to respond after report release.

Conclusion

Pacific Wild recognizes that caribou recovery is a genuine conservation emergency and that the dedicated scientists and staff working on this Program are motivated by a real desire to prevent extinctions. We share that goal. Our opposition to the Predator Reduction Program’s extension is not opposition to caribou recovery. Rather, it is a call to pursue recovery through means that are scientifically robust, ecologically sound, ethically defensible, legally grounded, and reflective of the values of British Columbians and the rights of Indigenous peoples.

The Program’s own proponents acknowledge that human-caused habitat loss is the root cause of caribou decline. A government that recognizes these conditions yet continues to sanction wolf



culls alongside ongoing industrial disturbance of critical caribou habitat is managing a crisis of its own making while delaying the structural reforms needed to address it.

Pacific Wild remains committed to constructive engagement and welcomes ongoing dialogue with the Wildlife Response Unit and the broader Caribou Recovery Program team. We ask that the Province treat this submission as an invitation to a deeper conversation and to a genuinely different approach.

Respectfully submitted,

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