



BC Draft Wolf Management Plan

Comments submitted by the Raincoast Conservation Foundation

Our appraisal and comments are in response to the standards and principles set out by the draft management plan (page ii). Specifically,

“A management plan identifies a set of coordinated conservation activities and land use measures needed to ensure, at a minimum, that the target species does not become threatened or endangered or is being managed for use, ecosystem goals, or ecological services. A management plan summarizes the best available science-based information on biology and threats to inform the development of a management framework.”

and

“This document identifies the management actions that are deemed necessary, based on the best available scientific information, to prevent Grey Wolf populations in British Columbia from becoming endangered or threatened.”

This is a deeply flawed management plan that contains many scientifically unsound and uninformed objectives. There is an exaggerated view of the impacts of wolves on both the livestock industry as well as hunting opportunities and a failure to consider the many ecological and economic benefits of having significant wolf populations in BC. The plan identifies conservation as important, but focuses exclusively on exploitation management and population control with little regard for conservation of wolves.

Further, the recommended management strategies inappropriately conflate and confuse management of wolves with conservation of wolves. The plan promotes apparently contradictory management strategies that include protection of wolf populations, hunting and trapping of wolf populations, control of wolf populations, protection of livestock on public lands, and culling of wolves to protect caribou.

To make matters worse, there is little evidence that the best available science informed the development of the proposed management framework or was incorporated into the plan itself. As an example, the scientific literature cited and used to support the proposed management strategies is noticeably deficient, particularly relating to conservation of wolves and contemporary conservation science. The superficial use of literature and failure to cite and consider relevant peer reviewed publications suggests carelessness, a lack of necessary proficiency and knowledge, or an agenda that predetermined the content of the management plan.

Despite rhetoric about conservation, the main thrust of BC's wolf management plan is clearly predator control with the goal of reducing predator impacts on huntable species like moose, elk and deer, plus contributing to a presumed reduction in livestock conflicts. Any rational review of the impact of wolves on BC's hunting opportunities as well as livestock industry would demonstrate that there is no "problem" in need of solving. We are strongly opposed to any increase in wolf hunting and/or trapping and recommend that BC revamp and reconsider the fundamental assumptions behind hunting predators.

Conservation and wildlife damage management are in a period of profound change. Many wildlife professionals and government agencies are not in synch with contemporary public and scientific opinion. Notwithstanding the intent of legal and policy instruments, history has shown that societal values ultimately determine the survival of species such as the wolf. Public pressure now demands that those involved with management of wolves must consider a wide range of public interests that often appear to conflict with one another. These interests include wildlife conservation, biological diversity, and the welfare of animals, as well as the use of wildlife for purposes of enjoyment, recreation and livelihood.

At minimum, a Conservation Plan for Wolves in BC should include establishment of protected areas for wolves. The BC Ministry of Environment has an *unfulfilled* initiative that advocated the creation of “preservation areas” that are “remote and of sufficient size to ensure the long-term viability of wolves”. In these areas, wolves were not to be killed, and the primary objective was to “maintain viable populations of wolves in their natural state” (Archibald 1989). Moreover, another Ministry publication noted, “the ecosystems that offer the best opportunities for the continued existence of these wolf - ungulate populations are those which have not yet been substantially altered by human development...” (Blower and Demarchi 1994).

A truly enlightened and progressive conservation plan, however, would abolish the notion that it is acceptable to kill wolves for sport and trophy.

Archibald, W.R. 1989. Wolf Management in British Columbia. *In* Wolf-Prey Dynamics and Management Proceedings. British Columbia Ministry of Environment. Wildlife Working Report No. WR-40. Victoria, BC.

Blower, D., and R. Demarchi. 1994. Large predator - prey ecosystems. Wildlife distribution mapping. BC Wildlife and Habitat Protection Branch. Victoria, BC