



# Ministers Wildlife Advisory Council

“Wildlife and their habitats thrive, are resilient, and support and enrich the lives of all British Columbians”

Minister Nathan Cullen, Water, Land and Resource Stewardship

Minister Bruce Ralston, Forests

August 3, 2023

Dear Ministers Cullen and Ralston,

Your Ministers' Wildlife Advisory Council was pleased to have the opportunity to meet with you during our March Council meeting in Victoria. Thank you for making yourselves available. We look forward to opportunities to get together in the near future.

Council continues to address many issues of significance to wildlife in British Columbia. In this letter, we present you with important recommendations and advice on five topics. Where we have presented specific recommendations, numbering of such in this letter continue from recommendations provided in previous letters. We are grateful for your responses to-date and await further updates via Ministry staff.

## Framework and Office for Biodiversity and Ecosystem Health

Council appreciates the ongoing opportunities to comment on the development of the Framework for Biodiversity and Ecosystem Health. Council has indicated that a paradigm shift prioritizing ecosystem health is crucial to the full and successful implementation of Together for Wildlife. We consider these the two most important initiatives upon which government has embarked to reverse downward trends for wildlife and wildlife habitat throughout British Columbia.

We understand the challenges posed by a change of this magnitude, but we continue to be encouraged by the progress to date. We offer two recommendations to advance the spirit and intent of Together for Wildlife in a way that bolsters the Framework.

### ***Recommendation #23: Communicate the importance of the "Framework"***

Council understands that the original name of this initiative, as derived from the Old Growth Strategic Review (OGSR) and its call for "Prioritizing Ecosystem Health and Resilience", included the word 'declaration', and that for reasons relating to potential conflict or confusion with the Declaration on the Rights of Indigenous Peoples Act (DRIPA), that word was deemed

inappropriate here. Yet, Council feels that to meet the original intent of its origin in the OGSR and to convey a meaning worthy of its importance, it must be communicated with a title that distinguishes it from lesser initiatives bearing the moniker “framework”.

**We strongly advise that the Framework be renamed as an edict, pronouncement, promulgation or other such title that is worthy of its purpose and goal.**

***Recommendation #24: Establish the Office of Biodiversity and Ecosystem Health to oversee the implementation of the Biodiversity and Ecosystem Health Framework***

An advisory note is attached pertaining to the proposed Office. The vision is to establish the equivalent of a “Dr. Bonnie Henry” and her office, dedicated to “Weaving Indigenous and Western Science” and overseeing the implementation of the Biodiversity and Ecosystem Health Framework.

The proposal highlights some key attributes of the Office:

- ♦ A legislated mandate to ensure that biodiversity and ecosystem health are prioritized in all natural resource management decisions
- ♦ Expertise to bring both western science and indigenous traditional knowledge on biodiversity and ecosystem health to ministries and First Nation Governing Bodies
- ♦ An independent body, supported by an external advisory body
- ♦ Statutory authority to prevent decisions being made that may cause irreversible damage to biodiversity and ecosystem health — “stop work orders”.
- ♦ Sufficient budget to engage appropriate expertise
- ♦ Transparency through regular reporting to government, First Nations Governing Bodies, Stakeholders, and the public

The establishment of this Office would be seen as a positive action towards making the Framework a reality and would send a clear signal of the government’s position on the priority of ecosystem health in B.C. Beyond that, its value towards Reconciliation with Indigenous peoples cannot be overstated.

## **Resource Roads**

Since our formation in 2020, Council has identified roads as a primary topic of concern in the stewardship of wildlife and habitats. Two recommendations have been previously brought forward aimed at decreasing the amount (#17, November 2021) and mitigating the impacts (#19, July 2022) of roads.

Council recognizes that addressing the impact of roads on wildlife and habitats is complex and multi-faceted. We want Ministers and ministry staff to be successful in the implementation of

broad-reaching strategies to reduce road impacts in support of thriving wildlife and habitats, which are also important components of reconciliation under DRIPA.

Thus, we now bring forward a recommendation for a bold and sustained strategy to mitigate impacts of roads on wildlife. The key is to implement immediate measures while formulating the action plan leading to a comprehensive road and access management strategy.

***Recommendation #25: Resource Roads Action Plan and Comprehensive Road and Access Management Strategy***

1. Council recommends that Ministers Ralston and Cullen jointly, and formally, acknowledge the significance and importance of the issue at hand, together with the need to address it, and
2. Council recommends that an action plan and timetable to address this issue be prepared by Ministry staff by August 2024, including the short-, mid- and long-term actions required for a comprehensive road and access management strategy complete with performance measures.

A Briefing Note is attached and includes two attachments with suggestions for immediate measures to be taken while this strategy is under development.

### **Conservation Lands Strategic Plan**

Council appreciates the opportunities to participate in the development of the new Strategic Plan for Conservation Lands. We understand the plan is undergoing internal review and we look forward to engaging in its release and providing advice on its implementation. Many Wildlife Management Areas (WMAs) await approval and could contribute to the Province's commitment to 30% protected lands and waters by 2030. Adoption of the new Strategic Plan will enhance the role of Conservation Lands in Modern Land Use Planning in B.C. Council also commented that a substantial budget (\$50 million) for Conservation Lands was required to help fulfill your mandate regarding a new Conservation Funding Mechanism.

### **Wild Sheep in British Columbia**

Council members reviewed the "BC Wild Sheep Summit Outcome Statement and Action Plan" prepared by the Wild Sheep Society of BC. We have sent a response to the Wild Sheep Society (attached). In addition, we make the following recommendation:

***Recommendation #26: Wild Sheep in B.C.***

The spread of disease from domestic to wild sheep continues to be a crucial conservation issue facing wild sheep populations in B.C. Council strongly supports strengthening the

commitments and policy and regulation reforms that address disease risks and achieve effective physical separation of domestic and wild sheep.

1. We recognize the use of existing regulatory protections under the Forest and Range Protection Act, and in particular the Government Actions Regulation. However, these protections have not resulted in enough action to ensure the sustainability of wild sheep in B.C., due to ongoing disease transmission. We understand a policy team has been re-energized but Council recommends that you to seek a stronger level of involvement and commitment from your colleague, Minister Pam Alexis, Minister of Agriculture and Food. This cross-ministry effort could improve outcomes for wild sheep and bring greater certainty to those who husband domestic animals.
2. The Wild Sheep Society has prepared a film called "Transmission." We recommend that you and your staff [view this film](#) for additional information about the deadly infectious bacteria known as *mycoplasma ovipneumoniae* (movi) that is passed from domestic sheep to wild sheep. We expect the information in that video will inform matters covered under this recommendation.

### **A Note of Concern**

A Council Co-Chair and Forum Co-Chair attended the BC Wild Sheep Summit in May 2023. We were appalled at the racist, misogynistic, and hateful views expressed by one of the speakers, and applauded by some audience members. The Wild Sheep Society Executive have issued a letter of apology to T4W attendees; however Council feels that deeper and meaningful efforts at reconciliation and creating a safe, ethical space for discussion is essential for this Society (and others) to maintain credibility and effectiveness. Council stands by its commitment to reconciliation, and we urge the B.C. Government to work with stakeholders to ensure that this is understood as an essential path to collaboration and cooperation.

### **Fisher and the BC Trappers Association**

Council has discussed the letter that the BC Trappers Association sent to the Provincial Hunting and Trapping Advisory Committee (PHTAT) providing comments on the proposed 2023 trapping regulation changes with respect to fisher. That letter and Council's response are attached for your information.

Council is pleased that your Ministries are meeting regularly with the BC Trappers Association to ensure the viability of fisher stewardship and trapping in British Columbia. We look forward to participating in the multi-stakeholder Fisher Management meetings and workshop scheduled to begin this fall. We note that the Together for Wildlife Strategy commits the Province to make wildlife and habitat stewardship decisions based on a foundation of

transparent and sound peer-reviewed science, combined with Indigenous knowledge and citizen science. The Province also has a responsibility to use the Precautionary Principle, particularly in cases related to species at risk, and where the validity of the current science is under discussion.

## Closing

We are pleased to submit these latest recommendations. We look forward to your responses to these and the remainder of our previous recommendations. Our next letter will include an update on the implementation of Together for Wildlife Regional Wildlife Advisory Committees. Slowly and attentively those committees are being established, while building trust and respect among community members, First Nations, and stakeholders.

Thank you, Ministers, for providing the leadership to protect B.C.'s world-renowned biodiversity and wildlife resources. Together for Wildlife and the Biodiversity and Ecosystem Health Framework are two commitments that hold much promise for healthier, sustainable future.

Simoogit Hleek (Chief Harry Nyce Sr.) and Nancy Wilkin  
Co-Chairs, Ministers Wildlife Advisory Council

### Attach:

- Advisory Note on Office of Biodiversity and Ecosystem Health
- Briefing Note: Mitigating Impacts of Resource Roads on Wildlife
- Letter from Council to Wild Sheep Society
- Letter from Council to BC Trappers Association

CC: Lori Halls, Deputy Minister, Water, Lands and Resource Stewardship  
Rick Manwaring, Deputy Minister, Forests  
Ministers Wildlife Advisory Council  
First Nations – B.C. Wildlife and Habitat Conservation Forum  
Provincial Hunting and Trapping Advisory Team  
David Muter, ADM, WLRS  
Colin Ward, ADM, WLRS, Reconciliation and Natural Resource Sector Policy  
Jennifer Psyllakis, Executive Director, WLRS  
Logan Wenham, A/Director of Fish and Wildlife, MOF  
Michael Burwash, Associate Director Wildlife, Fish & Wildlife Branch  
Avril Nagel, Manager, Together for Wildlife Implementation

### Ministers' Wildlife Advisory Council: Advice to Ministers

Date: July 31, 2023

**Proposal:** *To establish a Provincial Office of Biodiversity and Ecosystem Health to demonstrate the weaving of Indigenous and Western Science in resource management decision making and support the Biodiversity and Ecosystem Framework.*

**Proposed by:** The Ministers' Wildlife Advisory Council in collaboration with the WLRB Biodiversity and Ecosystem Health Framework Team.

#### Proposed action:

Create a Provincial Office of Biodiversity and Ecosystem Health (the Office) to help meet government's policy commitments and to create demonstrable benefits regarding wildlife and ecosystems for British Columbia. The Office and the position of Provincial Biodiversity and Ecosystem Health Officer (the Officer) would be established in Phase 1 of the Framework. Supporting legislation would follow in Phase 2 (Implementation of the Framework).

#### Current needs and challenges:

- ♦ There is an urgent need to improve the way science and traditional ecological and cultural knowledge of wildlife and habitat are used in decision making, especially as shared decision making becomes a greater part of government work with Indigenous communities. Ecological health, scientific (social and ecological) evidence, and Indigenous Knowledge must be meaningfully considered in government decisions.
- ♦ More rapid and informed decisions are required, without sacrificing biodiversity and ecosystem health outcomes. A reliance on academic and government research alone is not responsive or wholistic enough to meet the urgency and content of some decision-making processes.
- ♦ The need to support decisions with more information has arisen because of recent B.C. Supreme Court decisions (e.g., Yahey), rapidly changing land use decisions, government commitments to DRIPA, the Global Biodiversity Framework, and the prospect of greater shared decision making between Indigenous communities and the Government of B.C.
- ♦ There is a lack of cohesion among various resource Ministries and other governments who manage activities that affect ecosystems, leaving some aspects of science, conservation, and restoration to fall through the cracks. The challenge for the Biodiversity and Ecosystem Health Office will be to demonstrate the benefits of collaboration without creating additional bureaucracy.
- ♦ A strong degree of independence of this proposed body is required to regain the public's trust in governments' natural resource management.

#### Other approaches considered:

- ♦ *Inside vs outside government:* Current models of external advisory bodies, such as the Auditor General, are effective at disseminating information and highlighting gaps in public institutions, but generally do not have the authority to compel problem-solving actions.
- ♦ *Within the Chief Forester's Office:* This was considered to reduce additional bureaucracy in government, but it was determined this approach would fail to harmonize efforts across ministries. The Biodiversity and Ecosystem Health Office must be a cohesive force among many Ministries and other government authorities.

#### Guiding principles:

- ♦ To work within an ethical space and weave western and Indigenous knowledge.

## Ministers' Wildlife Advisory Council

- ♦ To harmonize efforts across Ministries, municipal and regional governments, First Nations, and the private sector to ensure that the health of the ecosystem is conserved and/or restored.
- ♦ To hold authority to ensure protection of biodiversity and ecosystem health, in accordance with legislation created to implement the Framework.
- ♦ To report to the public and publicize decision rationales.
- ♦ To form strong connections and help direct priorities with external scientific bodies, independent, academic, and industry research.
- ♦ To be durable across political cycles.
- ♦ To be independent, non-partisan, legitimate, and credible in the eyes of the public, government, and Indigenous communities.
- ♦ To support the growth of a restoration economy to actively heal biodiversity, land, and water.

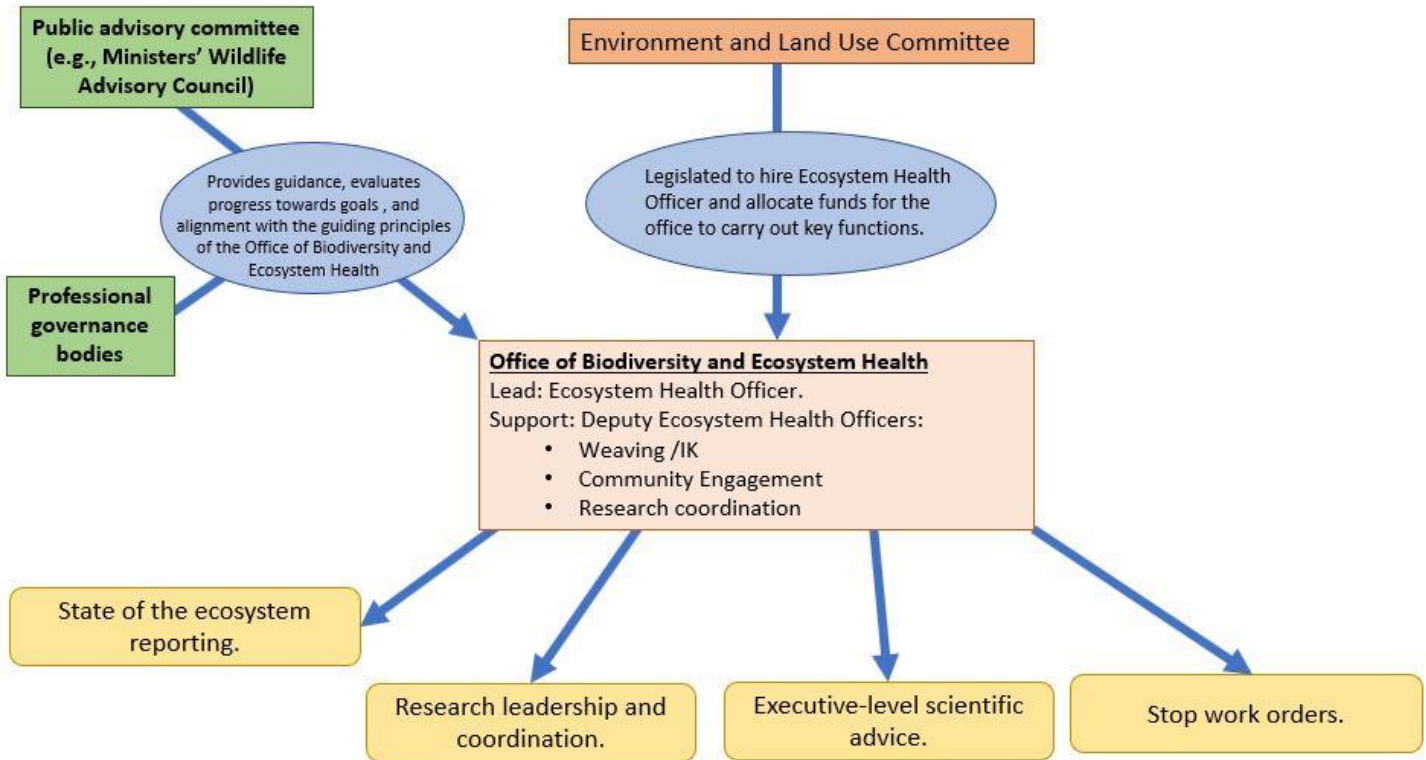
### Examples of Key Functions Performed by the Provincial Office of Ecosystem Health:

- ♦ Provide Ministers and First Nations with accountable, transparent, evidence-based recommendations on planned decisions forwarded to the Office.
- ♦ Provide a regular State of the Ecosystem Report, to track progress towards meeting the goals of the Biodiversity and Ecosystem Health Framework.
- ♦ Regularly convene western scientists and traditional ecological and cultural knowledge keepers to collect, share, prioritize, and weave together the best available information required to address biodiversity and ecosystem health protection and management.
- ♦ When planned decisions under current legislation, regulations, and policy may fail to ensure that the health of the ecosystem is sustainable and not at risk, the Officer will have the authority to issue ecosystem health orders, under the legislation established to implement the Framework. Such orders may defer or alter the rate, location, and types of planned resource extraction, land/water use, harvest, and restoration activities. Where there is potential for irreversible ecosystem loss, the Officer will be given powers equivalent to a "stop work order" under the legislation established to implement the Framework.
- ♦ Review past and current resource management policies to ensure past mistakes are not repeated and use this information to inform new policy and legislation in a transparent and accessible manner.

### Proposed structure and governance for the Provincial Office of Biodiversity and Ecosystem Health:

- ♦ **Leadership:** The Office will be led by a Biodiversity and Ecosystem Health Officer who has demonstrated commitment to weaving knowledge systems and expertise with provincial biodiversity, land, and water.
- ♦ **Expertise and diversity:** The Office will be supported by several Deputy Biodiversity and Ecosystem Health Officers whose role is to assist with the execution of the duties of the Office and to provide subject matter leadership, such as research prioritization, Indigenous Ways of Knowing, social science, ecology, and harvest management knowledge. Licensed professionals and Indigenous knowledge keepers will be a priority.
- ♦ **Durability:** The Office will be established in legislation and allocated a sufficient budget to function. A case could be made for selecting the Officer through an "all party" committee, with expert advice.
- ♦ **Accountability and Transparency:** The Office will report to the Environment and Land Use Committee. It will be responsive to a public advisory body, such as the Ministers' Wildlife Advisory Council, and the Office of Professional Governance. There will also be a reporting relationship with First Nations leadership, particularly in cases of shared decision making and co-management.

## Proposed structure for the Office of Biodiversity and Ecosystem Health





## MITIGATING IMPACTS OF RESOURCE ROADS ON WILDLIFE: INTERIM MEASURES AND LONG-TERM CHANGES CREATING TANGIBLE BENEFITS

**Date:** July 31, 2023

**Prepared for:** Honourable Bruce Ralston, Minister of Forests and Honourable Nathan Cullen, Minister of Water, Land and Resource Stewardship

**Issue:** Resource roads are one of the most significant factors negatively affecting wildlife and their habitat in British Columbia. Addressing the impacts of roads is complex and multi-faceted, but action should be taken to mitigate impacts and improve outcomes, including interim measures to address identified barriers to restoration while longer term strategies are developed.

### Background:

- ◆ Roads, and the human access they provide, can lead to excessive wildlife mortality, stream siltation and altered watershed dynamics, the dispersal of invasive plants, changes in animal behaviour and predator/prey dynamics, and the overall loss and degradation of wildlife habitat.
- ◆ Road networks create barriers to movement for many species, isolating their populations and interfering with their ability to shift habitats in a changing climate.
- ◆ There are approximately 680,000 km of resource roads in B.C., with ~10,000 km more built each year. Fewer than 1% of these are restored each year. The majority (75–90%) of these roads are built by the forest industry, although the petroleum industry is also a major contributor in the northeast part of the province. *Source: [Forest Practices Board Special Report 2015](#).*
- ◆ Thresholds for road densities and effective habitat distance from roads have been determined for grizzly bears, elk, and bull trout. Significant areas of the province now exceed these thresholds, with the vast majority in interior and northeastern B.C.
- ◆ Unrehabilitated resource roads directly impact the annual allowable cut as they remove future land from the timber harvesting landbase.
- ◆ Road restoration and access management is recognized as a complex, multi-faceted issue that, to be fully addressed, requires at a minimum:
  - better information and data management on road location, condition and ownership for all resource roads,
  - First Nation, stakeholder, and industry involvement,
  - effective mechanisms to a) restore roads as soon as possible once they are no longer needed to fulfill their original purpose, and b) reduce incentives to build roads and thereby decrease the overall number and length of roads built by all resource industries.

### Previous Advice from the Minister's Wildlife Advisory Council

Since its formation in 2020, the Ministers' Wildlife Advisory Council (the Council) has identified roads as a primary topic of concern for wildlife and habitat stewardship. The Council has previously provided two recommendations on this subject:

- Recommendation #17: Council recommends the implementation of a stumpage appraisal mechanism that enables the holder of a cutting authority to fairly and equitably recover the costs incurred of carrying out beneficial forestry roads rehabilitation work.
- Recommendation #19: We recommend that B.C. develop a cross-ministry strategy to systematically review high-risk locations, and to make recommendations for wildlife corridors and crossing needs/opportunities that will reduce harm to people and wildlife.

The Council recognizes the importance of the Province's success in the implementation of wide-reaching strategies to reduce road impacts in support of thriving wildlife and habitats, which are also important components of reconciliation and other vital initiatives. Restoration and reduction of roads are of key interest to many First Nations who are increasingly calling for restoration of roads as a condition of continued industrial activity within their traditional territories. Further, encouraging and prioritizing a multi-faceted approach to addressing roads will meet commitments laid out in the Together for Wildlife Strategy, Cumulative Effects Framework, Watershed Security Strategy, Old Growth Strategic Review, and the forthcoming Biodiversity and Ecosystem Health Framework.

### Recommendations:

1. Council recommends that Ministers Ralston and Cullen jointly and formally acknowledge the significance and importance of the issue at hand, and
2. Council recommends that an action plan and timetable to address this issue be prepared by Ministry staff by August 2024, including the short-, mid- and long-term actions required for a comprehensive road and access management strategy complete with performance measures.

Attachments 1 & 2 include suggestions for actions, including interim measures to be taken while this strategy is under development.

### Closing:

In the absence of bold and sustained action, the impacts of roads on wildlife and habitat will only compound over the coming years as road density increases on a finite landbase. By taking a comprehensive, phased approach to this issue, the Province will make great gains in securing tangible outcomes that reduce threats to biodiversity. As advisors to you both, we would welcome further opportunities to provide guidance and support your success on this important issue.

### **Attachment 1: Some actions that could be prioritized for inclusion within a road and access management strategy.**

Roads are a key threat factor and should be addressed as a common threat to multiple species versus a species-by-species approach. A comprehensive, phased approach will be required for success, including road restoration and new approaches to reduce road development. The approach should consider connectivity, corridors and wildlife crossings. It should also position habitat connectivity with other initiatives such as the Old Growth Strategic Review and 30x30.

Some actions that could be prioritized include:

Immediate, interim steps (1-2 yrs. to completion)

- ♦ Provide mandate to WLRS and FOR to collaboratively develop and implement a comprehensive road action plan that considers all elements of road management (rehabilitation, resource opportunities, recreation communities and pressures, future development, etc.) complete with performance measures.
- ♦ Adjust the Interior appraisal manual to encourage road restoration and decrease the number of roads built specifically within GAR order areas & areas deemed important for wildlife by Nations, the Province, and industry (see Attachment 2 for more details).
- ♦ Increase funding for the Cumulative Effects Framework to enhance its ability to model road management approaches for effective wildlife management.
- ♦ Encourage processes like forest landscape planning and modernized land use planning to set landscape and strategic-level objectives to control the proliferation of resource roads, reduce the density of existing roads, and reduce disturbance from roads across all industrial sectors.
- ♦ Provide the mandate, and accompanying resources, to FOR and WLRS to lead community dialogues on roads, access, and recreation.

Mid-term (4-7 yrs. to completion)

- ♦ Improve the quality and currency of road data across the province.
- ♦ Update the State of Environment reporting with improved data.
- ♦ Amend existing Government Action Regulations (Ungulate Winter Ranges, Wildlife Habitat Areas, Fisheries Sensitive Watersheds) to include road rehabilitation requirements as appropriate, and ensure these Orders are included in the Appraisal Manuals.

Long-term (8-15 yrs.+ to completion)

- ♦ Encourage processes like forest landscape planning and modernized land use planning to review and assess the effectiveness of objectives for roads and update according to new information.
- ♦ Continue mandate and accompanying resources for FOR and WLRS to lead community dialogues on roads, access, and recreation and review related policy decisions and actions to ensure the outcome of improved habitat for wildlife is being met.

### **Attachment 2: Example of Immediate Action: Broadening the Use of an Existing Tool in the Timber Appraisal Manual to Increase Road Restoration and Decrease the Number of New Roads Built.**

**Issue:** One of the most significant barriers to road rehabilitation by forest licensees is cost. Broadening the use of an existing timber pricing tool would address this barrier and result in an increase in the amount of newly built forestry road that is rehabilitated/restored and a decrease in the number of new roads built.

**Per Recommendation #17 of the MWAC:** Council recommends the implementation of a stumpage appraisal mechanism that enables the holder of a cutting authority to fairly and equitably recover the costs incurred of carrying out beneficial forestry roads rehabilitation work.

The information below provides an example of how Recommendation 17 could be implemented.

Current timber appraisal policy is based on the average efficient operator, which doesn't fully recognize the cost of road rehabilitation in areas where a greater amount of work than average is being undertaken. The exception is in two areas where rehabilitation is legally required under Ministerial Order: Omineca Moose Ungulate Winter Range (UWR) and East Kootenay Mountain Goat UWR. In these areas, Engineered Cost Estimates (ECE) are considered for roads rehabilitated to meet Order requirements, which recognize the actual costs incurred by licensees.

The current approach taken by the Ministry is to evaluate and amend the Interior Appraisal Manual separately for each new Government Action Regulation (GAR) order that contains road rehabilitation requirements.

Alternatively, amending the Interior Appraisal Manual to broaden the application of the ECE consideration so that it applies to areas already identified by the Province as important for wildlife (i.e., established UWR, Wildlife Habitat Areas, Fisheries Sensitive Watersheds) and for roads agreed upon by Nations, the Province, and licensees as being important for wildlife needs would be a **key interim step** that the Ministry of Forests could take while other, more time-consuming and comprehensive approaches are being developed and implemented. These other approaches include amending existing UWR/WHA/FSW Orders to include road rehabilitation requirements, and then following the current approach of listing them in the Appraisal manual on a one-off basis, and including road rehabilitation requirements in Forest Landscape Plans.

Note that this interim step would not result in roads that are necessary for fire evacuation, or that are deemed necessary for the safety of communities, being rehabilitated.

This step could be supplemented by the addition of the consideration for long-skidding as being ECE eligible. This would discourage the building of roads in situations where long-skids could be utilized instead, thereby decreasing the number of overall roads built.



# Ministers' Wildlife Advisory Council

"Wildlife and their habitats thrive, are resilient, and support and enrich the lives of all British Columbians"

Kyle Stelter, CEO

Wild Sheep Society of BC

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CC: Bill Jex [bill.jex@gov.bc.ca](mailto:bill.jex@gov.bc.ca), Chris Barker [barkerwildsheep@gmail.com](mailto:barkerwildsheep@gmail.com)

June 15, 2023

RE: BC Wild Sheep Summit Outcome Statement and Action Plan

Dear Mr. Stelter,

The Ministers' Wildlife Advisory Council met on May 10th, 2023 and reviewed the six Outcome Statements from your document entitled: "BC Wild Sheep Summit Outcome Statement and Action Plan".

As an overall statement, Council commented that wild sheep are a key icon of British Columbia. B.C. is a global stronghold for wild sheep diversity conservation and it is imperative to help ensure they survive and thrive into the future.

The role of the Council is to provide strategic advice to the Minister of Water, Land and Resource Stewardship and the Minister of Forests. Therefore we had to carefully consider what recommendations would be appropriate to make to the Ministers, in relation to the six outcome statements in your report.

We are pleased that Council came to the following advice:

1. The Ministers' Wildlife Advisory Council strongly supports strengthening the commitments and policy and regulation reforms that address disease risks and achieve effective separation of domestic and wild sheep. We acknowledge the ongoing collaboration and cooperation between the Ministry of Agriculture and Food and Ministry of Forests (joint ministry task force), and the MOF working with non-government organizations regarding sampling activities, surveillance of harvested sheep for disease, monitoring for innovative management techniques to reduce disease prevalence in wild herds in coordination with other jurisdictions, separation work and education, highway mitigation efforts to avoid collisions, and potential for a vaccine. In addition, we recognize

the use of existing regulatory protections under the *Forest and Range Protection Act*, and in particular the Government Actions Regulation. However, these protections have not resulted in enough action to ensure the sustainability of wild sheep in B.C. Council will encourage the Ministers to seek a stronger level of involvement and commitment from the Ministry of Agriculture and Food.

2. Council acknowledges the contributions the current Wild Sheep and Mountain Goat Specialist has made towards wild sheep and goat management and appreciate the support shown for that work by a variety of stakeholders, especially the Wild Sheep Society. Council does not advise on staffing decisions as they are the operational work of government. One suggestion that did come forward was that if government fully funded the position, the non-government portion of the funding could establish the beginning of a University “Chair” dedicated to wild sheep and goat research.
3. Your suggestion that the Mountain Sheep species Licence be separated into two separate species licenses is the business of Ministry staff and the Provincial Hunting and Trapping Advisory Team (PHTAT). We encourage you to continue working with staff in the Fish and Wildlife Branch and with PHTAT to explore this proposal as it could certainly enhance data collection and therefore inform management decisions.
4. Council supports an increase to the Conservation Surcharge for Mountain Sheep Species Licenses with those proceeds directed to wildlife and wildlife habitat conservation initiatives. We recognize that many license fees under the *Wildlife Act* have not been increased in some time and therefore, we have previously supported the BC Wildlife Federation’s resolution to double the Conservation Surcharge on hunting and species licenses (which includes Mountain Sheep Species Licenses). As for “dedicated” funding, this is an area being explored as part of the review of the *Wildlife Act*. The Conservation Surcharge (unlike hunting license fees) is already dedicated funding. Further, the Together for Wildlife Strategy includes a commitment to achieve increased and dedicated funding for all wildlife and habitat stewardship in B.C.
5. Council supports the development of a Provincial Bighorn Sheep Management Plan. We would also like to acknowledge the recent Provincial Stewardship Framework for Thinhorn Sheep—we understand this was a successful collaboration with First Nations, who have both an historic and cultural connection to Thinhorn Sheep. We understand that the Bighorn Sheep Management Plan is underway and being co-developed in a similar approach. Council looks forward to when Regional Wildlife Advisory Committees are established and working with First Nations and Stakeholders to develop objectives for wildlife and habitat stewardship, a key part of future management plans.
6. Council supports and will encourage the Ministers to view the film “Transmission”. Your organization is to be acknowledged for bringing public awareness to the importance of wild sheep and goat species in B.C. and therefore directly helping to ensure they survive and thrive into the future.

Once again Kyle, congratulations in bringing people together in Prince George at the Wild Sheep Summit and producing a thorough and important document. Council meets again in July and at that time we will be reviewing our next letter to the Ministers, which will include our advice as noted in this letter. Both this letter to you and the letter to the Ministers will be published on our website: [ministerswildlifeadvisory.ca](http://ministerswildlifeadvisory.ca).

Sincerely,

Simoogit Hleek (Chief Harry F. Nyce Sr.), Co-Chair  
Nancy L. Wilkin, Co-Chair

CC: Lori Halls, Deputy Minister, Water, Lands and Resource Stewardship  
Rick Manwaring, Deputy Minister, Forests  
Ministers Wildlife Advisory Council  
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Michael Burwash, Associate Director Wildlife, Fish & Wildlife Branch  
Avril Nagel, Manager, Together for Wildlife Implementation



# Minister's Wildlife Advisory Council

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Glen Cartwright, President  
BC Trappers Association  
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Prince George, BC, V2L 4V2  
By email: [info@bctrappers.ca](mailto:info@bctrappers.ca)

June 15, 2023

RE: Proposed 2023 Trapping Regulation Changes

Dear Mr. Cartwright,

Thank you for your February 2023 letter to the Provincial Hunting and Trapping Advisory Team (PHTAT), which the Ministers' Wildlife Advisory Council (MWAC) discussed at our May 10th, 2023 meeting. Council was very pleased to learn that the BC Trappers Association (BCTA) and the Province of B.C. have been meeting regularly to discuss fisher management and are continuing to meet for the foreseeable future. These collaborative efforts for wildlife and habitat management are critical to ensure effective data sharing, mutual understanding, and alignment of priorities wherever possible.

MWAC is also pleased to hear that planning for a multi-stakeholder Fisher Management Workshop and Symposium is underway by the Ministry of Water, Land and Resource Stewardship, Ministry of Forests, and the BCTA to review some of the fisher research, identify research gaps, discuss the listing and population health, and explore paths forward for fisher management. We understand that MWAC will be invited to take part once a date is set, and some members of Council do plan to attend. Although Council does not advise on regulations—that is the mandate of PHTAT—we feel the upcoming workshop will also include many strategic issues of interest to our members.

The Together for Wildlife Strategy commits the Province to make wildlife and habitat management decisions based on a foundation of transparent and sound peer-reviewed science, combined with Indigenous knowledge and citizen science. The Province also has a responsibility to use the Precautionary Principle, particularly in cases related to species at risk, and where the validity of the current science is under discussion.



We applaud your efforts to ensure the viability of trapping in British Columbia, fishers and their habitat, and acknowledge your long-time support for ecosystem health and environmental stewardship.

Council's mandate is to advise the Minister of Water, Land and Resource Stewardship and the Minister of Forests. In our next correspondence with the Ministers, we will be including our support for ongoing collaboration between BCTA and Ministry, and in particular the proposed workshop on fisher. That letter will be posted publicly on our website, [ministerswildlifeadvisory.ca](http://ministerswildlifeadvisory.ca).

Sincerely,

Simoogit Hleek (Chief Harry F. Nyce Sr.), Co-Chair  
Nancy L. Wilkin, Co-Chair

Attach: Letter from BCTA to PHTAT, February 2023

CC: Lori Halls, Deputy Minister, Water, Lands and Resource Stewardship  
Rick Manwaring, Deputy Minister, Forests  
Ministers' Wildlife Advisory Council  
First Nations – B.C. Wildlife and Habitat Conservation Forum  
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