# Provincial Caribou Recovery Program WHAT WE HEARD REPORT

Ministry of Forests, Lands, Natural Resource Operations and Rural Development



OCTOBER 2018



Ministry of Forests, Lands, Natural Resource Operations and Rural Development

CARIBOU RECOVERY PROGRAM: WHAT WE HEARD REPORT OCTOBER, 2018

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## **BACKGROUND**

this year.

From April to June 2018, the Province engaged with the public and industry stakeholders regarding a new program to recover and conserve woodland caribou in British Columbia. In parallel, the Province continues to engage with and consult Indigenous peoples, both through this process, as well as with specific discussions. In engaging with these three groups, the Province has collected unique perspectives and expertise that will help inform the development of a draft plan that is targeted for completion later

While caribou can thrive in challenging environmental conditions, changes in their habitat have created significant threats to ensuring a sustainable population. As a result, the Province drafted the Provincial Caribou Recovery Program discussion paper, which outlines the challenges and opportunities associated with conservation efforts of caribou across the province. While many actions have been highlighted in the draft report, the Province values the knowledge, ideas and experiences of the public, and is working to incorporate feedback into the final Caribou Recovery Program.

## APPROACH TO GATHERING INPUT AND RESPONDENT DEMOGRAPHICS

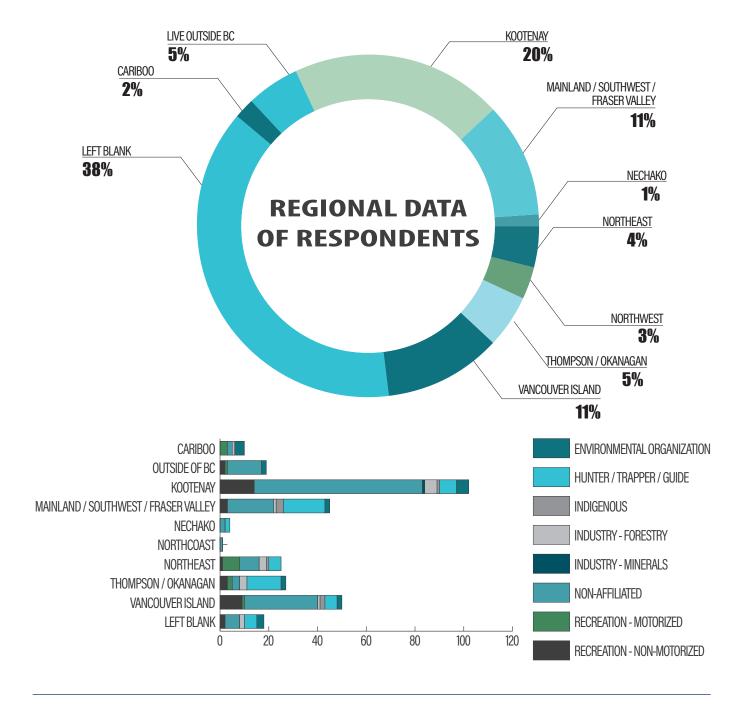
In soliciting feedback, the draft Recovery Program discussion paper was made available to the public from April 20 to June 15, 2018. The website received over 2,000 views and



generated approximately 600 comments, 2,590 emails, and 23 stakeholder submissions. The ideas from the paper were also discussed with over 40 stakeholders and at 12 meetings with Indigenous groups.

Members of the public who commented on the draft report had the option of disclosing regional demographics. Of the 598 comments, 338 were associated with a specific region. As respondents were encouraged to comment on multiple sections of the report, a single respondent's location could be reflected in the data several times. Of the 10 regions identified, the majority of respondents reported being from Kootenay (20%), Mainland/Southwest/Fraser Valley (11%), and Vancouver Island (11%), while another 38% did not disclose a location.

Along with regional demographics, respondents were also able to identify their roles, which are depicted in the bar chart below. 313 of the 598 comments were associated with a specific role. These identifiers were associated with the regional data, with the majority of respondents being non-affiliated from Kootenay (69), or hunters/trappers or guides from the Mainland (17).





### **COMMENTS ON DRAFT REPORT**

The following section provides an overview of the most commonly identified themes from the comments made throughout the Draft Recovery Program discussion paper. Additional details regarding the number of comments associated with each key theme can be found in Appendix 1 of this document.

#### **PRIMARY THEMES**

The primary themes identified represent areas of common interest and/or concern from respondents throughout the province and have been further broken down into subthemes where applicable.

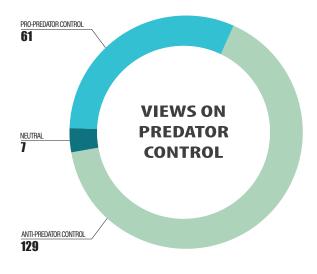
#### 1. PREDATOR MANAGEMENT

Respondents held strong opinions both for and against the practice of removing predators within caribou habitat. Of the 598 comments, 197 made reference to predator control, of which 61 were for the removal of predators, 129 were against, and 7 held a neutral opinion.

The majority of proponents of predator control believe that removal should be treated as a stopgap measure until old growth habitat can regrow and remain protected in perpetuity. Many respondents agreed that the speed of implementing this approach would help to reduce mortality rates of caribou and their young as an interim

measure, but that habitat restoration would ultimately act as the long-term solution. As well, this action was primarily targeted at controlling the wolf population, since wolves are the main predators of caribou in British Columbia.

Those who made comments opposing the use of predatory control measures were also of the opinion that a lack of scientific evidence exists to support culling practices. Respondents believe that those efforts imposed by the government in the past have not helped





to increase caribou populations and are often misguided attempts to cover up the issue of deforestation and habitat degradation. Commentary that is against predator control is therefore generally accompanied by comments about focusing on limiting industrial activity and focusing on habitat protection and restoration.

#### 2. HABITAT MANAGEMENT

Much of the conversation around caribou conservation centred around habitat management. Those respondents that commented on habitat were primarily advocating legislation focused on protecting critical habitat, as well as expressing concerns regarding the government's ability to restore caribou habitat in a timely and cost-effective manner. Of the 598 comments, 196 mentioned habitat management, and often in conjunction with the other main themes above.

Regarding legislation, respondents asked that the government impose recovery targets with clear and measurable objectives and implementation pathways. Many people thought that the protection of these habitats is more important than restoration, as the latter would take centuries to achieve. For this reason, a number of

comments expressed the importance of ensuring the enforcement of legislation by way of harsher penalties and fines levied against those industries that adversely affect these ecosystems.

When commenting on the restoration of caribou habitat, respondents asked that the Province seek additional financial support from the federal government, as ecological restoration will be a long-term endeavour. It was also noted that when creating restoration plans, the government would need to consult with Indigenous groups and scientific experts. As well, respondents commented on the necessity of creating a moratorium on human activity in these regions while implementing recovery plans.



#### 3. LIMIT HUMAN ACTIVITY IN CARIBOU INHABITED AREAS

Throughout the report, many respondents expressed strong opinions for limiting human activity in caribou inhabited areas. In particular, comments focused on two key areas: forestry and industry involvement and recreation. Of the 598 comments received on the Draft Recovery Report, 180 discussed the issue of human activity, of which 59 focused on forestry related involvement, 56 on recreational activities, and 65 on human activity more broadly.

FORESTRY AND INDUSTRY INVOLVEMENT
Concerns regarding forestry and/or logging were identified by many respondents as the main factor affecting caribou populations. The threat imposed by industrial activity on old growth forests in British Columbia is particularly worrisome to many, as the loss of these mature forests deprive caribou of lichen - their primary food source. Many held the opinion that forestry activity is continuing in high value caribou habitat and they hope to see the provincial government apply strict legislation on industrial activities that will help to minimize deforestation.

In addition, many respondents expressed frustration with the link drawn between industry, caribou population and rate of predation, stating that industry, not wildlife, should be held accountable for the decrease in herd size. In converting old growth habitats into young forest landscapes, industrial

activity creates the ideal space for deer, elk and moose to graze. As these ungulates move into caribou habitat, they are followed by predators that hunt caribou as a secondary source of prey. Respondents held strong opinions that rather than manage predators, the government should acknowledge forestry activity as the causal factor creating all other effects, and instead place restrictions on industry to restore balance to the ecosystem.

#### **RECREATION**

Another sub-theme emerging from comments on the discussion paper was the need to minimize recreational activity both within, and in proximity to, caribou habitat. Many people shared the opinion of limiting activities such as skiing and hiking by encouraging licensees to manage access to these sensitive areas. Along with these activities, the majority of respondents were particularly concerned with the effects of snowmobiling, Specifically, people felt that action should be taken to further reduce the number of snowmobile trails, as many believe that the packed snow enables predators to have easier access to caribou. Additionally, respondents asked that recreation clubs educate their members to ensure they comply with and respect land stewardship principles and trail closures.

#### **SECONDARY THEMES**

In addition to the primary themes, four secondary themes emerged in the comments. These themes were identified less often than the key themes described above; however, they were notable and are described below.

#### 1. APPLYING SCIENTIFIC REASONING

Of the 598 comments, 48 made reference to the need to use scientific reasoning when finalizing the Caribou Recovery Program. Many of the comments made about scientific reasoning were made in collaboration with either predator control (15) or Indigenous collaboration (8). The former stressed that before making the decision to cull a predator species, to consult with scientific experts and to utilize studies that support this action. The latter talked of the importance of consulting with scientific experts and Indigenous groups, who both offer a unique and knowledgeable perspective that will help to inform the final report.

#### 2. INDIGENOUS COLLABORATION

Throughout the paper, 44 comments were made that underscored the importance of collaborating with Indigenous groups when creating a new Recovery Plan. Respondents felt strongly that the Province and Indigenous groups should co-manage the land and its

resources, as this is a crucial part of the reconciliation process. As well, respondents felt that when creating population targets, they should meet the needs of the First Nations, both treaty and non-treaty.

#### 3. GOVERNMENT'S INVOLVEMENT

Of the 598 comments, 24 critically addressed government's involvement in carrying out a caribou conservation program. Respondents believe that government must prioritize caribou recovery over those of industry and interest groups in order to realize a successful outcome.

#### 4. IMPLEMENTING THE PLAN OUICKLY

In total, 23 comments were made regarding the critical nature of executing the Recovery Plan quickly, as caribou and their habitat are already facing imminent extinction. Respondents felt that the five-year timeline for the program was too long and stressed the need for immediate emergency action rather than undergoing further studies before implementation.





### **EMAIL SUBMISSIONS**

#### PRIMARY THEMES

This section provides an overview of the key themes emerging from the emails received from interested parties and members of the public. Of the 2,590 emails submitted, 3 primary themes were identified. In the majority of cases, these themes were integrated into a recommendation for caribou recovery. Additional details regarding the number of comments associated with each key theme can be found in Appendix 1 of this document. The following section identifies each theme, which are further broken down by sub-theme. As well, because emails predominately fell into a primary theme, there were no secondary themes identified within this section.

#### 1. PREDATOR CONTROL

The majority of email submissions focused around the topic of predator control, with many voicing opposition towards the practice of removing predators from caribou habitat. Of the 2,590 emails submitted, 1,747 opposed the tactic of removing predator species from caribou habitat, with nine emails advocating for the effectiveness of such a process.

#### OPPONENTS OF PREDATOR CONTROL

The majority of submissions expressed concern regarding predator removal. Many comments noted the need to employ a more compassionate approach to caribou recovery, impressing the need to focus on habitat protection and restoration rather

than managing predator populations. Specifically, of the 1,747 comments against predator control, 901 advocated for habitat management as the best suited solution for caribou recovery. While the Ministry noted that it would not use such a tactic in isolation, the significant number of comments suggest a strong sense that such a measure not be used at all. In addition, a large number of submissions (653 emails) referenced the detrimental effects of hunting, recreational and industrial activities on caribou habitat, noting that such activities disturb critical areas while also having repercussions on predator behavior and hunting patterns. Also, a number of comments were received expressing opposition to predator management due to a lack of scientific evidence produced to defend such an action. Lastly, in



analyzing these emails, it was noted that a significant number of comments (444) were submitted by one organization whose mandate is focused on encouraging a positive attitude towards predators in general, and wolves in particular.

#### PROPONENTS OF PREDATOR CONTROL

Of the 2,590 emails, only nine made note of the efficacy of utilizing predator control to help restore and sustain caribou populations. Each submission stated their concern over the growing population of wolves in particular, consequently advocating for the management of these species as an interim measure while also applying other actions such as habitat restoration and penning.

#### 2. HABITAT MANAGEMENT

As one of the Province's core focuses for caribou recovery, habitat management emerged as another key theme within the email submissions. Of the 2,590 emails received, over 50% (1,535) commented on the importance of habitat management as the primary action to which funds and efforts should be focused. In supporting their advocacy for habitat management, many comments also referred to sub-themes that were suggested to help support and strengthen such management programs. The following list details each sub-theme, with some emails referencing two or more subthemes within the same submission.

#### HABITAT PROTECTION

With 721 references, habitat protection emerged as the most dominant sub-theme of habitat management. Proponents of protection stated that the need for caribou conservation is immediate and, as such, immediate measures must be put in place. Many comments stressed the importance of imposing a moratorium on human activity in critical caribou habitat, inclusive of industry, recreational activities and tourism. If more regulations on land use were implemented, advocates suggested that the impact of human activity will be mitigated, ultimately allowing for longer-term restoration planning.

#### HABITAT RESTORATION

Another key sub-theme identified for habitat management was that of habitat restoration.

Of the 1,535 emails, 463 referenced restoration as an important measure for caribou recovery. As mentioned above, many submissions noted the long-term nature of such an action plan, as caribou predominately reside in old growth forests. Proponents of restoration therefore asked for strong action plans for all herds, tied to population recovery targets with sufficient funding.

#### PUBLIC EDUCATION

Educating the public was identified as an important objective when implementing habitat management plans. 241 email submissions referenced this action as one such measure that would help to promote and sustain management practices, as this would help many to become informed of the unique needs of caribou. Advocates of education believe that as a bustling tourist destination, British Columbia is visited by many individuals who have not had exposure to caribou and must be informed by recreation and tourist groups that can advocate on the importance of this creature on behalf of the province and its people.

#### **INCENTIVE PROGRAMS**

A final sub-theme identified within habitat management was that of creating better incentive programs for licensees. 110 emails directly referenced the need for these programs as a way to help modify human behaviour and minimize human interaction within caribou habitat.





#### 3. HUMAN ACTIVITY

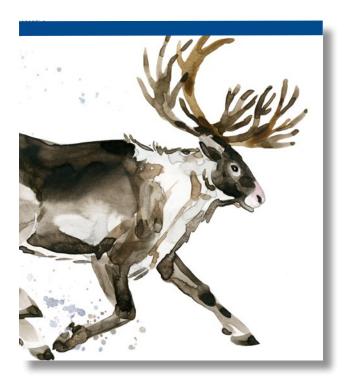
Another theme arising from the email submissions related to limiting human activity in caribou inhabited areas. For the purposes of theming these submissions, emails were grouped into either industrial or recreational activities, with hunting being treated as a separate category under predator management. 292 emails referenced the need to put a moratorium on human activities, with 141 focusing on industry, 39 on recreation, and 112 on both.

#### INDUSTRY INVOLVEMENT

Many submissions expressed concern regarding the level of industrial activity both in and around high value caribou habitat. In particular, forestry, mining and road building were referenced as having a detrimental impact on old growth forests and, consequently, the lichen on which caribou graze. Comments expressed a desire to see stricter legislation enacted against those industries, resulting in drastically minimized resource exploitation around caribou habitat. As well, many stated that big business, not predators, should be held accountable for caribou population decline.

#### RECREATION

A second sub-theme of human activity is that of recreation. Comments made reference to such activities as heli-skiing, snowmobiling, skiing and snowshoeing, noting them as experiences that produce highly negative impacts for caribou herds. Most notably, submissions asserted that snowmobile trails are providing easier routes for predators to access alpine areas, resulting in a greater likelihood of caribou being hunted. As a result, comments suggested that there be a decrease in trails around caribou habitat, as well as for recreational clubs to educate their users to abide by rules and regulations that may affect caribou migration patterns.



## STAKEHOLDER SUBMISSIONS

As part of the engagement process, stakeholders were encouraged to make written submissions regarding ideas, experience and suggestions towards the draft Caribou Recovery Program discussion paper. In total, 23 submissions were received. Submissions were grouped by theme according to the contents of the draft Recovery Program discussion paper. Appendix 2 shows additional information identifying each group or organization, as well as the sections which they commented on.

## A NEW APPROACH: MADE IN B.C

Section three of the draft Recovery Program reviews the Province's new approach to protect and preserve caribou populations. Of the 23 stakeholder submissions, 6 directly commented on the specifics of this section concerning program delivery, objectives and challenges.

In considering program delivery, some stakeholders expressed their support for one management plan, stating that uniformity would help organizations participate and provide assistance more effectively.

However, while the Province has proposed that two ministries lead program delivery for caribou management, a majority of stakeholders felt that the Federal Government be a co-equal decision maker as caribou belong to all Canadians.

When speaking to the objectives, some organizations felt that the Program included broad aspirational statements around its objectives and principles that lacked specifics on process. As well, some of the intended recovery goals seemed to be in conflict with economic interests, and the Province will have to be transparent in their choices where trade-offs are evident.

## MANAGEMENT AND DECISION MAKING

Section four of the Recovery Program details the different ways in which the Province plans to implement a program-wide management system to guide all aspects of caribou recovery strategies. 11 of the 23 stakeholder submissions made reference to some or all aspects of this section.

In reference to herd plans, stakeholders support the recognition of the unique circumstances of each herd, and that tailored plans will need to be implemented to rehabilitate those groups that are not yet functionally extinct. Tools such as land use models can be effective in the recovery process, but organizations stressed the importance of having a long-term outlook with a focus on scientific integrity and transparency. As well, stakeholders ask that the Province develop a robust monitoring system with evaluations that will help to determine the effectiveness of actions and measures.

#### **MANAGING HABITAT**

Managing caribou habitat was identified by the Province as being one of the primary methods for caribou recovery. Such an action, however, has broad implications for many stakeholders, and, as a result, was brought up in 21 of the 23 submissions.

Undisturbed caribou habitat is critical to the recovery of these species. However, industrial activities such as mining, forestry, oil and gas, renewable energy and road building have all impacted high value caribou habitat. To see the successful implementation of

protective measures, six stakeholder groups, primarily representing not-for-profit foundations, have advocated that the government place an immediate moratorium on all activities that encroach on and disturb these environments, inclusive of recreation and industry. As well, a majority of these stakeholders asked that the provincial policy and regulations pertaining to caribou habitat protection be *Species at Risk Act (SARA)*-compliant for all Crown land.

While protective and restorative measures are critical to caribou, a number of other stakeholders expressed concerns over the socio-economic implications of these actions. In total, 12 submissions, primarily representing private sector organizations, were made that asked that the Province provide a clearly articulated and measurable approach to identifying highest value habitat that is based on best-available scientific information and traditional knowledge. These stakeholders state their support for caribou recovery and assert their desire for continued collaboration with the Province to minimize socio-economic impacts while helping the Province to rehabilitate high-value caribou habitat.

#### MANAGING POPULATIONS

Section six of the draft Recovery Program deals with managing populations through a variety of different mechanisms. Of the 23 stakeholder submissions, 18 made comments about these measures, in particular in terms of predator control. Stakeholders were both for and against these measures, as is summarized below.

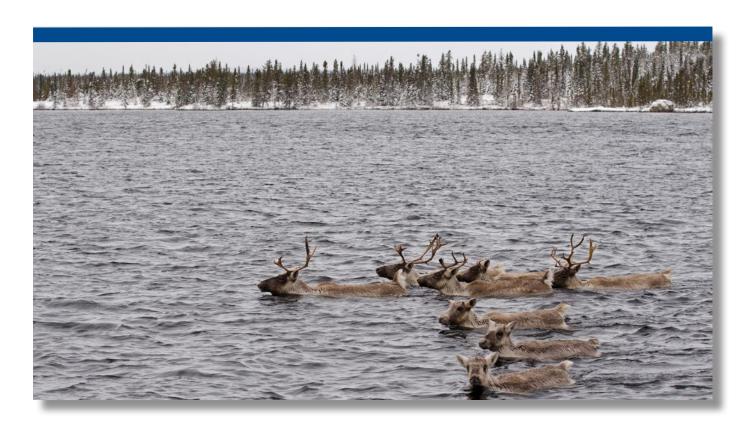
10 stakeholders made submissions advocating for the need for predator management measures. Most advocates, however, asserted that this action must be targeted and part of an integrated program that focuses on other recovery tactics, such as habitat protection and legislation. Proponents also commented on the need to follow scientific information and traditional knowledge, and to use this action as a stop-gap measure until herd populations have recovered.

Of the 18 submissions on managing populations, six stakeholders were against the use of predator management as a means for caribou recovery. Advocates of this view assert that it is the loss of historic habitat due to human activity that results in easy access for wolf travel, and thus heightened caribou predation. These

stakeholders therefore requested that the Recovery Program call off these actions and focus their efforts and funding on measures that protect habitat and place restrictions on industry and recreation.

In relation to the section on primary prey management, stakeholders had mixed opinions on the use of such an action. While several submissions talked of the necessity of managing prey populations to reduce the presence of predators, other stakeholders questioned the action of reducing one species' population to benefit that of another. As well, several submissions noted that prey management cannot be conducted in a silo but should be coordinated with Indigenous and other efforts while considering scientific rationale and public transparency.

Additionally, some submissions commented upon the use of penning. Used in conjunction with other management tools, penning may help to decrease neonate morality rates. However, use of such an action should be subject to the needs of each herd. Stakeholders recognize this action as an interim step, but question its longevity due to cost, lack of scalability, animal health related concerns and the de-wilding of wildlife. Such a measure should therefore be exercised with caution amongst other methods of recovery.



### WHAT'S NEXT

The provincial government is dedicated to the recovery and conservation of woodland caribou in British Columbia. The Provincial Caribou Recovery Program is a long-term commitment that will include all BC caribou herds in a comprehensive and uniform approach to conservation, based on traditional knowledge and science.

We are grateful to everyone who took the time to share their opinions, concerns and sentiments with us. The feedback received will guide government in moving forward with BC's Provincial Caribou Recovery Program and inform next steps regarding the development of the final draft of the Provincial Caribou Recovery Program targeted for completion later this year.

Many of the people who participated in this engagement process shared deeply personal experiences and intimate feelings. What we heard shows the need for an effective response to recovering and conserving woodland caribou in the province.

The provincial government continues to engage, consult,

and partner with the Government of Canada, Indigenous communities and groups, adjacent jurisdictions, industry, stakeholders, and conservation and environmental organizations.

You can follow along as the Provincial Caribou Recovery Program progresses through the Province's Caribou Landing Page, where you can access further resources and information, including Program updates as they become available: <a href="mailto:gov.bc.ca/caribou">gov.bc.ca/caribou</a>

### **APPENDIX 1: THEME SUMMARY**

There were multiple opportunities for interested parties to email and/or comment on the Draft Caribou Recovery Program. The table below reflects the total number of comments made in relation to each theme, both by comment and by email. In both methods, many respondents made reference to two or more themes within the same comment – the table below accounts

for this overlap, as many of the themes are intimately interconnected. While there was a total of 598 comments made on the report, the table below reflects a total of 831 comments. Additionally, overlap of themes can be seen in the emails, where the total reflected is 3,780 despite having received 2,590 emails.

THEME	DESCRIPTION	COMMENTS	<b>EMAILS</b>
Predator Management <sup>1</sup>	Comments regarding the practice of culling predator species, with respondents divided between pro and antipredator control.	197	1,756
Habitat Management	Comments and suggestions around habitat protection and restoration, as well as legislation surrounding these actions.	196	1,535
Limit Human Activity in Caribou Inhabited Areas	Comments about the need to drastically reduce human activity in and around caribou habitat, inclusive of forestry and industrial involvement, tourism and recreational activities.	180	292
Applying Scientific Reasoning	Comments pertaining to the need to draw on scientific expertise when creating final Recovery Program.	48	478
Indigenous Collaboration	Comments and suggestions about co-managing the land and resources with Indigenous groups, both for specialized knowledge as well as reconciliation with First Nations.	44	25
Government's Involvement	Comments describing the importance of Government's prioritization of Caribou recovery over other interests.	24	-
Implementing the Plan Quickly	Comments about the need to have immediate emergency action and urgency surrounding the protection of caribou and their habitats.	23	25
Other	These comments were individual comments that focused on the general improvement of the Draft Recovery Plan, the penning, monitoring and merging of herds, land use plans and the need for transparency and public engagement. These comments were unique in nature and did not align with any of the primary or secondary themes nor did they formulate any additional themes due to the singularity of their nature.	119	185

<sup>&</sup>lt;sup>1</sup> The majority of emails that made reference to scientific reasoning were tied to the primary theme of predator management.

## APPENDIX 2: LIST OF GROUPS AND ORGANIZATIONS THAT MADE SUBMISSIONS

The table below identifies stakeholder groups or organizations that submitted responses to the draft Caribou Recovery Paper. The submissions have been

grouped according to the different initiatives within the paper, reflecting those comments that were of primary focus within the letters.

GROUP OR ORGANIZATION	NEW APPROACH: MADE IN B.C.	MANAGEMENT & DECISION MAKING	MANAGING HABITAT	MANAGING POPULATIONS
Association for Mineral Exploration				
BC Nature				
BC Society for the Prevention of Cruelty to Animals				
BC Snowmobile Federation				
BC Wildlife Federation				
Canadian Association of Petroleum Producers				
Caribou Scientists & Advisors				
City of Revelstoke				
Conservation Northwest				
Council of Forest Industries				
David Suzuki Foundation				
East Kootney Wildlife Association				
Gorman Group				
Helicat Canada				
Humane Society International - Canada				
Interior Lumber Manufacturers' Association				
Mining Association of BC				
Northern Guides Association				
Revelstoke Community Forest Corporation				
Tourism Revelstoke				
Valemount and Area Recreation Development Association				
Wolf Awareness Inc.				
Yellowstone to Yukon Conservation Initiative				

## **APPENDIX 3: RECOMMENDATIONS FROM** STAKEHOLDER SUBMISSIONS

Of the 23 stakeholder submissions received, many made proposals and/or recommendations to the Province regarding working together towards a common goal of saving the caribou. The table below highlights excerpts from these submissions as they relate to a theme.

The table is not an exhaustive list of all stakeholder requests and proposals, but rather a selection of recommendations that provide insight into key themes that have been highlighted through this report.

GROUP OR ORGANIZATION	THEME	RECOMMENDATION
BC Society for the Prevention of Cruelty to Animals	Indigenous Collaboration	"The BC SPCA supports the submission of Yellowstone to Yukon Conservation Initiative, in so far as it emphasizes the need for effective habitat protections and to ensure that cumulative impacts are incorporated in long-term planning. Further, we support the government's commitment to implement the United Nations Declaration on the Rights of Indigenous Peoples and engage
	Human Activity	meaningfully with First Nations on government-to-government agreements that are science-based and informed by traditional knowledge. To prevent further caribou losses during recovery planning, a moratorium on activities within all critical caribou ranges will provide the government more time to effectively create plans and engage stakeholders."
BC Snowmobile Federation	Human Activity	"BCSF Snowmobile Club Stewardship Management Agreements (SMA)- There is no mention of the existing Stewardship Management Agreements that snowmobile clubs currently have or an intent to continue them. These agreements have been largely successful at managing recreational access. Some of the herds that are stable or increasing exist in areas where clubs have SMA Agreements. The volunteer closures maintained by a club have the highest compliance rates by snowmobilers. The Memorandum of Understanding between the Province and the BCSF should be refreshed to include updated SMA agreement templates and increased partnership as we move forward."
Canadian Association of Petroleum Producers	Management & Decision Making	"CAPP is supportive structured decision making that relies on modelling tools, such as Bayesian belief networks. This modelling work was foundational to industry's collaborative work with the Government of BC in northeast BC. The use of similar complex and comprehensive models to understand potential outcomes of the application of different combinations of recovery measures are important for increasing support for the Government's caribou recovery program. We believe that these types of models are important for defining different combinations of recovery actions that can be more broadly supported by many stakeholders."

# APPENDIX 3: RECOMMENDATIONS FROM STAKEHOLDER SUBMISSIONS, CONTINUED

GROUP OR ORGANIZATION	ТНЕМЕ	RECOMMENDATION
City of Revelstoke	Management & Decision Making	"As part of the current Program, data is being captured on current counts, herd locations, herd movements and mortalities. If shared publickly this data could significantly impact stakeholder's ability to understand caribou behaviour and movements and allow them to participate more fully in recovery efforts."
David Suzuki Foundation	Habitat Management	"Provincial policy and regulations pertaining to caribou habitat protection measures must be SARA-compliant, which, for boreal caribou, means establishing a clear link between protective actions and effective protection of CH, including limits to cumulative disturbance in accordance with the management threshold and acknowledgement of the underlying empirical relationship. For boreal caribou, BC should articulate targets in terms consistent with the federal management threshold and articulate strategies and timelines for moving from the current status to the targets. For mountain caribou, BC should articulate targets and timelines to implement the directives in the federal Recovery Strategy."
Helicat Canada	Managing Populations	"If BC is willing to share {access to real-time location data from collared caribou} with us within 12 hours (not only from existing collared animals but also from those collared in future), we could then immediately make decisions to utilize other areas and manage ski runs in "real time." These decisions happen in twice-daily guide meetings. We recognize that not all animals are (or will be) collared, but if those collars are on animals in many different herds, this would further reduce the probability of interactions between sector activities and caribou."
Mining Association of BC	Habitat Management	"MABC supports the need for caribou habitat conservation and population management measures to be selected based on the needs of each herd, and informed by scientific information and traditional knowledge unique to the specific population unit. When evaluating the spectrum of measures available to achieve habitat conservation, restoration, population management and access management outcomes, MABC encourages the province to take an inclusive approach. MABC and our members would be pleased to engage more deeply with the provincial government, Indigenous communities, and other stakeholders to consider a range of possible measures."

## **APPENDIX 3: RECOMMENDATIONS FROM** STAKEHOLDER SUBMISSIONS, CONTINUED

GROUP OR ORGANIZATION	THEME	RECOMMENDATION
Wolf Awareness Inc.	Transparency	Wolf Awareness "encourages {the Province} to develop and implement an action plan with sound ecological and ethical foundations. We request that any discussion papers or actions resulting from such documents undergo external scientific review to ensure they meet national guidelines, including those set out by the Canadian Council of Animal Care, and are implemented in ways that allow for robust analysis of the impacts of each management type (i.e. habitat protection, habitat regeneration, and recreational use closures). "
Yellowstone to Yukon Initiative	Engaging the Community	"Developing an effective caribou recovery strategy is a process that must be guided by the best science which has recognized that habitat destruction is not compatible with recovery as well as indigenous knowledge.  Commitments must stem from government-to government negotiations with First Nations: while critical, stakeholder engagement processes cannot be a replacement for science-based action and government-to-government agreements. Implementation of recovery plans must be funded for the long term, and overseen by independent scientists and indigenous knowledge-holders, to reduce political influence on recovery decisions into the future."

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