

Ottawa, Ontario  
K1A 0H3

January 31, 2002

Mr. Christoph Bail  
European Union  
Directorate-General  
Environment  
Directorate E – Global and International Affairs  
ENV.E.3 – Development and the Environment  
Brussels  
BELGIUM

Dear Mr. Bail,

Subject: Grizzly Bears (*Ursus arctos*) from British Columbia

Thank you for your letter of December 10, 2001 providing information on the proposed treatment of the importation in the European Union of grizzly bear trophies originating in British Columbia. Please find below information that will be helpful for the members of the Scientific Review Group (SRG) of the European Union to better understand the status of grizzly bears in British Columbia, and Canadian decisions with respect to the issuance of CITES export permits.

[The provincial government has overall responsibility](#) for the management of the grizzly bear in British Columbia. The federal government of Canada is accountable for implementing the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) through a series of co-operative arrangements with provincial and territorial governments.

It is also important to remember that the grizzly bear is listed in Appendix II of CITES under the provision of Article II,.2. (b), which allows the inclusion of a species that is not in itself endangered, but cannot be readily distinguished from a species that does need the protection of the Convention. The grizzly bear is included in CITES because its hides and other products cannot be distinguished in trade from those of endangered bear species in other parts of the world, not because it is considered endangered in Canada.

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With an overall Canadian population of 25,000 to 30,000, the grizzly bear is not an endangered or threatened species in Canada. COSEWIC, the Committee on the Status of Endangered Wildlife in Canada, an independent scientific body that assesses the conservation status of wild species in Canada does not consider the grizzly bear to be endangered. It does list the grizzly bear as a *Species of Special Concern*, an indication of lower risk, but still needing careful management attention. Environment Canada continues to work with the province to ensure that grizzly bears do not become endangered or threatened.

#### Situation of the Grizzly Bear in British Columbia:

Because of the large size of the province (about 950,000 km<sup>2</sup> or the combined surface of both France and Germany) and the elusive behavior of the grizzly bear living mostly in forests, it is impossible to determine the exact number of grizzly bears in British Columbia. That does not mean there is not sufficient information available to manage harvests sustainable. The approach taken in British Columbia is to “err on the side of caution” by managing hunting based on minimum population estimates in order to address the inherent uncertainty in counting or estimating grizzly bear population size.

Some grizzly bear habitat has indeed disappeared in the last 100-150 years as a direct result of settlements, intensive agricultural development, cattle and sheep ranching. Past unregulated commercial hunting and predator control also contributed to the decline of the species at that time. But today grizzly bears still occupy 89% of their historic range in the province.

The Government of British Columbia estimates the current minimum grizzly bear habitat potential at approximately 19,000 bears in the occupied habitat in the province. The current minimum population of approximately 13,800 grizzly bears (including cubs) in British Columbia represents 25% of all the grizzly bears living in North America.

This precautionary estimate is derived from a combination of inventory results for specific areas and extrapolation to other areas on the basis of current habitat potential combined with an assessment of human impacts. ([Annex 1](#)).

A technique called Fuhr-Demarchi is applied to estimate rather than count the size of the population. This technique is the most highly evolved method in North America for hierarchically categorizing wildlife habitat and is based on extrapolating densities based on habitats or ecosystems and a detailed consideration of human impacts. The habitat mapping technique is being applied elsewhere but F-D technique for estimating population size isn't, although as described in the Non Detriment Finding other jurisdiction use similar methods. (**Annex 2**)

The NDF report outlines a considerable body of work that has served to ground truth and refine the estimates derived through the Fuhr-Demarchi method. It has been revised to include much more technical detail

For example "DNA mark-recapture" method samples (**Annex 3**) have now been conducted over a large area allowing for direct comparisons to the previous population estimates. The area presently covered by DNA mark-recapture projects producing data represents more than 52,000 km<sup>2</sup> (a little less than the area of Belgium and The Netherlands together).

It is a legal requirement for hunters to bring any harvested grizzly bear to a provincial government office for inspection. All non-hunting mortalities including illegal kills, animal control kills, road kills etc. have also been tracked through the same system. A premolar is removed from inspected animals for aging. As a result, there is detailed information available on mortality levels, hunter effort and success, the age and sex of animals killed, kill location and kill type for the period since 1976.

Grizzly bear hunting in British Columbia is not managed on the basis of any trends or desired harvest characteristics (aside from mortality levels) in the age/sex of the animals killed as these indicators are not considered to be sufficiently reliable as a basis for management.

Instead of relying on harvest trends that may provide a false sense of security, this information is only used on an ad hoc basis to identify areas where more detailed study may be warranted.

The analysis of those data, however, demonstrates that there are no trends in the available harvest data that suggest a province-wide grizzly bear population decline. In the attached NDF report emphasis is placed on comparing the four years prior to the implementation of province wide Limited Entry Hunting (LEH) in the fall of 1996 (1992 – 1995) with the four years following (1997 – 2000) (**Annex 1**)

The purpose of Limited Entry Hunting (LEH) is to allow managers to control the number of hunters in any given area. This system is the most conservative and restrictive option available for harvested species in BC.

Eleven Grizzly Bear Units (out of 60 total) that are classified as "Threatened" (less than 50% of their current habitat potential) have a minimum estimate of 644 bears (5% of the provincial total) and are closed to hunting.

The number of grizzly bears killed overall, harvested and killed by non-residents average respectively 298, 236 and 97 for the period between 1997-2000. More than 80% of the grizzly bear trophies are exported to the USA and about 15% (14-17 trophies) to the European Union. The data for 1997-2000 actually reflect the current management regime using LEH's.

The legal kill takes about 3% of the population annually and is adjusted so that the overall loss to human-caused mortality does not exceed 6% (or lower depending on the quality of the habitat in each area). The province asserts that the main problem facing the grizzly bear in BC is not legal hunting, but habitat loss combined with increased exposure to humans, which increases poaching and nuisance and defense kills. The status of grizzly bear populations in BC varies considerably and this is reflected in the province's management regime.

A Grizzly Bear Scientific Panel is reviewing the management of the grizzly bear hunting in the Province of British Columbia. This independent Panel – established by the provincial Minister of Water, Land and Air Protection consists of six members appointed on the basis of recommendations from the International Association for Bear Research and Management. The aim of this scientific Panel is to ensure that the grizzly bear management program is effective in ensuring the long term conservation of grizzly bear populations in British Columbia ([Annex 4a and 4b](#))

The panel's present work consists in reviewing grizzly bear harvest management and more specifically the population estimates and harvest procedures ([Annex 5](#)). The Panel had met three to date. Their [interim report](#) is scheduled for February 2002. It is a scoping document and the recommendations will only be included in the final report which will be submitted by the end of 2002.

Subsequent management of grizzly bear hunting in British Columbia will follow the Panel's recommendations.

Therefore, we believe that under the current management regime, the export of grizzly bears from British Columbia has no significant effect on the population or distribution of the species in the province.

Management for this species is consistent with modern wildlife management principles, and the legal harvest also considers moralities due to other causes to ensure the maintenance of grizzly bear populations. We have provided additional and more detailed information in the attachments. Several points are noteworthy and are noted below for your information:

1. There has been no significant change in the range of grizzly bears in British Columbia in the past 30 years.
2. All estimates (Fuhr-Demarchi, hunter success, hunter days/kill, age and sex ratios of bears taken) indicate that the population is stable overall.
3. Any areas where conservation concerns are indicated are closed to hunting.
4. The harvest of bears is so small that even if the provincial population was only 6,000 grizzly bears (less than half the current minimum estimate) it would still be <4%.
5. Export of grizzly bear trophies is even smaller, and definitely at a level where concerns identifying exports as a cause for population and range decreases are unwarranted.

Finally, the NDF Checklist summarizing the different scientific data that is available shows that only one item goes beyond the mean value by one unit: the tolerance of the species to human disturbance. Other items warrant further attention but none indicate that the situation is critical. (**Annex 1 fig.19**)

Both the Province of British Columbia and Environment Canada will continue to work together to ensure that the grizzly bears do not become endangered or threatened. The Province of British Columbia has a comprehensive grizzly bear management program and confirms that the main problem facing grizzly bear populations is not legal hunting but habitat loss combined with increased exposure to humans, which increases poaching and nuisance and defense kills. Published literature speaks by itself for British Columbia's long-time involvement in the management and the conservation of grizzly bears. (**Annex 6**)

As a final concern we would like to respond to some of the specific points raised by the SRG as we believe there are some substantial issues and background that the European Commission and the Scientific Review Group should be aware of. The letter (attached as **Annex 7**) from Matt Austin, Large Carnivore Specialist for the provincial government in British Columbia and from Mitch Taylor (**Annex8**), author of a non-published article about the status of grizzly bears are included to provide those clarifications.

## ANNEXES AND ADDITIONAL DOCUMENTATION

Due to the importance of this issue , we are providing you with the following documentation to allow the members of the SRG to be fully cognizant of the present situation.

<b>1</b>	CITES NDF Report – Final version from British Columbia	This report provides an explicit overview of the situation.
<b>2</b>	Grizzly bear habitat Methodology / Fuhr-Demarchi Method (factsheet)	Explains the F-D method.
<b>3</b>	Draft scientific paper on “A comparison of DNA mark-recapture and Fuhr-Demarchi / step-down population and density estimates for grizzly bears in British Columbia.”	Describes the DNA recapture and Fuhr-Demarchi / step-down methods, the estimation of density with those methods and the comparison of both estimates.
<b>4</b>	Grizzly Bear Science Panel information	List of members of the Panel
<b>5</b>	Terms of Reference of the Peer Review of Population Estimates and Harvest Procedures by the Grizzly Bear Scientific Panel	The first interim report is due February 2002
<b>6</b>	British Columbia Grizzly Bear Bibliography	Comprehensive list of (mostly) recent publications and studies showing efforts to better understand the status of the Grizzly Bear in British Columbia.
<b>7</b>	Letter from Matt Austin, Large Carnivore specialist to Dave Fraser CITES Scientific Authority in British Columbia	Provides substantial issues and background that the European Commission and the Scientific Review Group should be aware of.
<b>8</b>	Letter from Mitch Taylor explaining why his report should not be quoted	The draft report which does not appropriately explain the situation of grizzly bears in British Columbia has been misused.

Further relevant documents can be found on the Web

	Grizzly Bear Conservation Strategy including information on the North Cascades Grizzly Bear Recovery Plan	<a href="http://wlapwww.gov.bc.ca/wld/grzz/index.htm">http://wlapwww.gov.bc.ca/wld/grzz/index.htm</a> As with the other 11 threatened populations, the North Cascades grizzly bears are not hunted, the purpose is to recover this population via an integrated approach
<b>9</b>	Grizzly Bear Harvest Management Procedure is used to determine grizzly bear harvests	The Procedure is deliberately conservative, to ensure that legal hunting does not impact conservation of grizzly populations. Also available at <a href="http://wlapwww.gov.bc.ca/wld/">http://wlapwww.gov.bc.ca/wld/</a>

For further scientific information in British Columbia, please contact **Matt Austin** [(250) 387-9799], Large Carnivore Specialist, Biodiversity Branch, Ministry of Water, Land and Air Protection, British Columbia, Canada.

Yours sincerely,

Bertrand von ARX  
Scientific Authority, CITES and international Coordinator  
Canadian Wildlife Service