

July 6, 2022

Michael A. Pickup  
Auditor General  
Office of the Auditor General of British Columbia  
623 Fort Street  
Victoria, BC V8W 1G1

**RE: Request for Audit of a Public Agency  
(British Columbia Conservation Officer Service)**

Dear Mr. Michael A. Pickup,

Established in 1953, The Fur-Bearers is a registered charity dedicated to protecting fur-bearing animals through conservation, advocacy, research and education. We have over 60,000 supporters across Canada, the majority of whom live in British Columbia.

The Fur-Bearers is respectfully calling upon the Auditor General of British Columbia to conduct an independent audit of the British Columbia Conservation Officer Service (BCCOS). In our view, it is necessary to ensure provincial taxpayers are receiving value for their money and the BCCOS is effectively fulfilling its wildlife protection mandate.

**Background**

The BCCOS is an armed law enforcement service within the Province of British Columbia that operates within the Ministry of Environment and Climate Change Strategy. The agency employs sworn constables under the *Police Act* and has a wide mandate to enforce over 33 independent pieces of legislation. It is a uniformed public facing provincial policing agency with an approximate annual budget of 22 million<sup>1</sup> and nearly 200 staff<sup>2</sup>. The agency garners significant public and media attention with regards to the treatment of wildlife, investigation of offences, and general interactions with citizens in the province.

Obtaining information regarding regional financial expenditures and detailed distribution of funds within the BCCOS is difficult, as much information is not publicly accessible and not readily shared through the Freedom of Information process. Detailed breakdowns of financial expenditures are therefore not included here, the lack of which raises significant questions regarding the financial transparency within the BCCOS.

**Previous Auditor General assessment regarding BCCOS performance**

In 2017 the Auditor General of BC released a report on grizzly bear management in BC.<sup>3</sup> In the report, the Auditor General noted the BCCOS's lack of evaluations into its own and WildSafeBC's effectiveness. From the report:

*ii) Reducing illegal activities*

*The Conservation Officer Service (COS) within the Ministry of Environment works to reduce illegal activities such as poaching, attracting wildlife, or failing to report a bear killed due to conflict. We expected the COS to*

<sup>1</sup><https://www2.gov.bc.ca/assets/gov/british-columbians-our-governments/government-finances/public-accounts/2020-21/pa-2020-21-crf-supplementary-schedules.pdf>

<sup>2</sup>[http://docs.openinfo.gov.bc.ca/Ministry\\_of\\_Environment\\_and\\_Climate\\_Change\\_Strategy\\_Estimates\\_Notes\\_2021.pdf](http://docs.openinfo.gov.bc.ca/Ministry_of_Environment_and_Climate_Change_Strategy_Estimates_Notes_2021.pdf)

<sup>3</sup><https://www.bcauditor.com/pubs/2017/independent-audit-grizzly-bear-management>

*be evaluating the tools and resources it has available (warnings, tickets and formal charges) to ensure they are effective and sufficient, but no such evaluations have taken place. (Page 7)*

### iii) Reducing grizzly bear/human conflicts

*From 2006 to 2015, there have been 389 grizzly bears killed from human/bear conflict (non-hunt mortalities). This has resulted in an increasing number of grizzly bear incidents attended by a Conservation Officer. The COS has revised its procedures to evaluate the conflict and not automatically assume that a grizzly bear should be destroyed. The COS relies on WildSafe BC to deliver an education program to prevent conflict with bears but the program is limited and the COS has not evaluated it for its effectiveness. (Page 7-8)*

WildSafeBC has received annual funding from the BCCOS for many years, normally at approximately \$275,000 per annum.<sup>4</sup> These funds are awarded through a shared cost arrangement.

It has been nearly five years since the Auditor General made these observations regarding the BCCOS and its effectiveness in reducing illegal activities and reducing human-bear conflicts. As far as we're aware, no such evaluations have been conducted by the BCCOS.

## **Killing wildlife vs. law enforcement**

### Killing wildlife

The BCCOS publishes predator conflict statistics for three different species of animals: black bears, grizzly bears, and cougars. The statistics provide insight into the number of human-wildlife conflict calls reported to the BCCOS and the agency's response to these calls. The data points are: *Number of Calls, Number Attended, Destroyed by COS, Destroyed by Other, Total Destroyed, Translocated, Hazed, Cubs to Rehab*. Black bears are by far the most killed animal by the BCCOS and these animals are a primary focus of The Fur-Bearers' education and advocacy campaigns. In April 2022, The Fur-Bearers submitted a complaint to the BCCOS over its killing of young black bears.<sup>5</sup>

The number of black bears killed by conservation officers is significant. From 2015 - 2021, the average number of black bears killed annually is over 500. Annual trends show that there is no improvement in the reduction of bear deaths in BC. **The data shows a relatively constant level in the number of bear killings, reflecting a problematic status quo where lethal force against wildlife is deployed at a much higher rate than preventative measures such as compliance and enforcement actions.**

To provide further insight into the areas where BCCOS officers are killing the most black bears, The Fur-Bearers has published a breakdown of bear killings by community from 2015-2021.<sup>6</sup> This information was obtained through a freedom of information request and highlights the deadliest communities for black bears in British Columbia. This data reveals areas with significant and disproportionate amounts of bear killings by the agency.

### Law enforcement

One of the key drivers that result in human-bear encounters is individuals or companies intentionally or unintentionally feeding wildlife. Under the *Wildlife Act*, it is illegal to feed or leave attractants that could attract wildlife. The BCCOS is responsible for enforcing these provisions under the legislation. Not only does enforcement serve to punish illegal actions, but it also acts as a deterrent to modify human behaviour and acts as a prevention mechanism. Publicly available data shows enforcement is severely inadequate when viewed alongside the high number of bears being killed by officers.

The [Natural Resources Compliance and Enforcement Database](#) provides information regarding the number of compliance and enforcement actions under specific statutes and provisions. Table 1 shows the number of fines issued under the

<sup>4</sup>[http://docs.openinfo.gov.bc.ca/DA25019\\_Directly\\_Awarded\\_Contracts\\_Ministry\\_of\\_Environment\\_and\\_Climate\\_Change\\_Strategy\\_Mar\\_ch\\_2021.pdf](http://docs.openinfo.gov.bc.ca/DA25019_Directly_Awarded_Contracts_Ministry_of_Environment_and_Climate_Change_Strategy_Mar_ch_2021.pdf)

<sup>5</sup><https://thefurbearers.com/blog/news-bccos-bear-cub-killings-prompt-formal-complaint/>

<sup>6</sup><https://thefurbearers.com/blog/number-of-black-bears-killed-in-british-columbia-communities/>

*Wildlife Act*. The search variables used are: *Keyword Search: 'attract', 'attractant', 'feed', 'dangerous'; Issued to: 'companies and individuals'; Issued under which Act: 'Wildlife Act'.*

In the second column, the resulting offences under the Wildlife Act cover:

- Attract dangerous wildlife to land or premises
- Intentionally feed dangerous wildlife
- Intentionally provide, leave or place an attractant to attract dangerous wildlife
- Provides, leaves or places food, food waste or other substance that could attract dangerous wildlife to land or premises
- Fail to comply with dangerous wildlife protection order

Year	Enforcement Actions	Black bears killed by BCCOS officers
2015	58	541
2016	34	519
2017	50	536
2018	26	415
2019	75	632
2020	113	555
2021	85	581
<b>Total</b>	<b>441</b>	<b>3779</b>

*Table 1: Enforcement actions and bears killed by BCCOS  
Sources: NRCED database, FOI MOE-2022-21065*

## Cost Savings

It is likely that a significant portion of the BCCOS budget is spent on responses to bear complaints through the Report All Poachers and Polluters (RAPP) hotline.

Rather than focus its approach on taking proactive and appropriate enforcement actions against offenders and addressing attractant management, the data presented here reveals that the agency routinely kills wildlife to address human-animal conflict. In our view, this is not an effective use of resources; it also undermines the agency's mandate of protecting wildlife. This reactive approach comes at a significant cost for the government and ultimately the taxpayers of British Columbia.

Because these kill numbers are roughly consistent year after year, it raises questions about the agency's effectiveness and its allocation of resources. Questions need to be asked about how the agency is measuring success and evaluating progress when it comes to the reduction of bear killings and enforcement actions for attractants. There also needs to be focus on high-priority municipalities and regions where the highest number of bear killings occur.

## Recommendation

The issues presented here offer sufficient cause and a starting point to investigate the agency's operations and efficacy. We recommend that the Auditor General conduct a full audit of the BCCOS. The issues raised in the 2017 report regarding the effectiveness of BCCOS and WildSafeBC need to be revisited and expanded beyond grizzly bear management. From 2015 to 2021, 151 grizzly bears were killed by BCCOS officers. In the same time period, the agency killed 3779 black bears. Despite the best efforts of wildlife protection organizations, neighborhood advocacy groups, concerned citizens, and municipalities that take leadership on bear coexistence, bears continue to be killed throughout the province by the BCCOS with no sign of abating.