

February 13, 2020

File #: BL 864.00001
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VIA COURIER

**Minister of Forests, Lands, Natural Resource Operations and Rural Development
501 Belleville Street, Room 248
Victoria, BC V8V 2L8**

Attention: Honourable Doug Donaldson

Dear Sir:

**Re: Cease and Desist Wolf Cull Due to Unlawful Decision and Public Safety
Concerns**

We are counsel for Pacific Wild Alliance (“Pacific Wild”). Pacific Wild is a wilderness and wildlife protection non-profit organization in British Columbia. One of its main campaigns is to raise public awareness of the importance wolves play in British Columbia’s ecosystem, and to protect wolves in this province.

Pacific Wild is aware that the government (“Government”) of British Columbia intends to proceed with another wolf cull this winter in the South Selkirk and South Peace regions.

As you are aware, the wolf cull involves radio-collaring single wolves, tracking them to their packs, and then aerial gunning the wolf family units, from helicopters. We are writing to you to cease and desist with the wolf cull, as it is unlawful and inhumane.

Under section 27 of the *Wildlife Act*, it is an offence to “use a helicopter while on a hunting expedition”. Section 3 of the *Permit Regulation* allows the contravention of section 27 of the *Wildlife Act*, but section 3 of the *Permit Regulation* does not extend to exempting a person from the prohibition of “using a helicopter while on a hunting expedition” (with emphasis). As such, the Regional Manager does not have the authority to issue a permit for the current wolf cull, as it is in direct contravention of the law.

It is also concerning that the Government is proceeding with a wolf cull that is inhumane, while also being a threat to public safety.

We are advised by experts that aerial gunning wolves from helicopters is inhumane. Killing wolves in this manner causes unnecessary suffering and distress that can be avoided altogether. Also, it is clear from the Government’s own internal document – namely, the *South Peace Caribou Recovery following Five Years of Experimental Wolf*

Reduction (August, 2019), by Mike Bridger – that the Government no longer requires gunners to ensure that the animal is dead and not suffering. Not only is this inhumane, but it reverses the Government's previous requirement that the permit holder "ensure that the wolves are treated in a humane manner and are not subjected to any unnecessary harm or suffering".

In addition, the Regional Manager is obliged under section 5(1)(b) of the *Permit Regulation* to satisfy himself or herself that issuing a permit is not contrary to the proper management of wildlife resources in British Columbia. The Government violates that duty if it permits the wolf cull to be performed in a manner which allows the wolves to suffer. Moreover, section 14 of the *Permit Regulation* requires the permit holder to record and report the date that wildlife was killed, which cannot be determined if the animal is left to suffer.

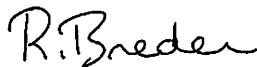
These are additional reasons the wolf cull is unlawful.

Having gunmen shoot moving targets (running wolves) from a moving origin (flying helicopter) is also a danger to the public. It is simply not safe to shoot moving animals from a moving aircraft when there can easily be unidentified backcountry enthusiasts in the area.

Pacific Wild is acting in the public interest in its attempt to protect wolves. It is demanding that the Government immediately cease to proceed with the wolf cull. Please respond to this letter by **February 28, 2020**.

If the Government declines to reply to this letter, and/or proceeds with the wolf cull, we have instructions to file legal proceedings against the Government to prevent it from continuing with the wolf cull.

Yours truly,
BREDER LAW CORPORATION



Per:
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