



**DAVID SUZUKI
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GRIZZLY TROPHIES IN EUROPE
**ARE B.C. GRIZZLY BEAR PARTS BEING
UNLAWFULLY IMPORTED INTO THE EU?**



GRIZZLY TROPHIES IN EUROPE: ARE B.C. GRIZZLY BEAR PARTS BEING UNLAWFULLY IMPORTED INTO THE EU?

by Jeff Gaius

July 2018

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**Grizzlies at
Knight Inlet, B.C.**

PHOTO COURTESY RAY
MORRIS/FLICKE COMMONS

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EXECUTIVE SUMMARY

Despite a 2004 European Union suspension on importing grizzly bear parts from B.C., a review shows that Canada granted dozens of export permits to EU trophy hunters.



TROPHY HUNTING HAS BEEN THE LARGEST SOURCE of human-caused death for British Columbia grizzly bears for decades. In several B.C. grizzly bear management units where licensed trophy hunting was permitted, grizzly bear deaths rose to levels considered unsustainable by wildlife biologists.

In 2004, the European Union's Scientific Review Group (SRG) suspended importation of grizzly bear hunting trophies from B.C. because of legitimate concerns about the sustainability of grizzly bear management, particularly the possibility that trophy hunting was contributing to unsustainable levels of human-caused mortality. Although the B.C. guide-outfitting industry complained that the EU suspension had eliminated its EU clientele, media reports indicated that EU hunters continued to travel to B.C. to kill grizzly bears. What was unknown was how many EU hunters continued to hunt grizzly bears in B.C. with the intent of importing their trophies into the EU, despite the ban.

A review of export permits granted by CITES (Convention on International Trade in Endangered Species of Wild Fauna and Flora) between 2004 and 2015 indicates that between 25 and 36 hunters from the EU received export permits to repatriate grizzly hunting trophies. There is also evidence that the management and implementation of Canada's CITES permitting system, which is the only mechanism available to track the movement of grizzly bear hunting trophies across national borders, is not as effective as it needs to be. While the fate of most of these grizzly bear hunting trophies is unknown, records from Germany and Denmark indicate that some hunters tried unsuccessfully to import B.C. grizzly bear trophies into EU member states. However, further research is necessary to figure out whether the remaining grizzly bear hunting trophies were left in B.C. or the U.S., or were unlawfully transported into the EU.

While the current ban on trophy hunting in B.C. prevents all hunters from killing grizzly bears for sport, this policy is by no means permanent. A formal review by CITES and customs agencies in Canada and the EU would prevent EU hunters from killing grizzly bears in B.C. or other areas of Canada, and attempting to import them into the EU.

The David Suzuki Foundation has campaigned for close to 15 years to improve the science and management of grizzly bears and to end the trophy hunt. We have published scientific studies on grizzly bear management, supported thousands of people who wanted to speak out against the trophy hunt and convinced B.C.'s auditor general to investigate the trophy hunt and other grizzly bear policies. This report was commissioned to explore whether trophy taking was still a factor driving grizzly bear deaths and to examine whether international trade rules were an effective check on unsustainable hunting practices.

In December 2017, the B.C. government banned grizzly bear hunting throughout the province. This welcome policy would benefit by being made law. Other parts of Canada, especially Yukon, also need to ban trophy hunting. Most areas of the country with historical and current bear populations need to improve science, habitat protection and management practices to help grizzly bears thrive.

A century ago, 35,000 grizzly bears lived in B.C. Others flourished from Alaska to Mexico to Manitoba. Only 15,000 B.C. grizzly bears remain and nine populations are on the verge of disappearing.

This report was commissioned to explore whether trophy taking was still a factor driving grizzly bear deaths and to examine whether international trade rules were an effective check on unsustainable hunting practices.

PHOTO OPPOSITE: GRIZZLY IN KNIGHT INLET, B.C., COURTESY TIMNUTT/FLICKR



FOREWORD

by David Suzuki



Top photo: Grizzly habitat in the Llewellyn Glacier, in B.C.'s Stikine region.

PHOTO COURTESY TAKU RIVER TLINGIT FIRST NATION/PROVINCE OF B.C.

YEARS AGO, I WAS SURPRISED to learn that a grizzly bear is protected in the continental United States, but if it walks across the border into British Columbia, it can be killed for sport. So we did a program on them for CBC's *The Nature of Things*. I was amazed to see pictures from the 1800s of immense piles of skulls from grizzlies that were slaughtered to make room for early settlers on the prairies. Grizzlies were not just mountain animals in the West; they flourished on bison all the way to the Manitoba-Ontario border and south to Texas and California (where the only place you'll find one now is on the state flag). Grizzlies need

space — tagged animals have been known to travel over hundreds of square kilometres in a season. But the cumulative impacts of habitat loss and fragmentation from logging, mining, road building, urbanization and other land-use pressures have forced them into isolated patches of mountainous terrain.

The U.S. *Endangered Species Act* lists the grizzly as “threatened”, meaning it is in danger of becoming extinct. Grizzly bears in Canada are ranked as “special concern” by Canada’s scientific committee on species at risk, the Committee on the Status of Endangered Wildlife in Canada, or COSEWIC, but they remain legally unprotected. In the absence of legal protection, they continue to be hunted unsustainably in B.C. Government statistics show that approximately 300 grizzly bears are killed by trophy hunters in the province each year. And as our latest report by the David Suzuki Foundation shows, many bears have been killed by foreign hunting tourists, who came to British Columbia each year to try and kill a grizzly bear with the hope of taking home a “trophy” — pelts, paws, heads and other body parts to display in their homes.

As our report reveals, there is alarming evidence that B.C. and federal Canadian authorities helped to facilitate the trade in grizzly trophies, despite the EU ban. Questions remain about the ability of government agencies to accurately monitor the movement of other wildlife species killed in Canada.

Successive B.C. governments have argued that the grizzly hunt is sustainable, but the methods by which it estimates the numbers of bears are imprecise. In fact, many leading bear biologists say the B.C. government's estimates—about 15,000 grizzlies—are high and that the number may be much lower. Analyses of grizzly bear mortality by independent researchers have found that over-killing of bears is widespread in many regions of the province.

In December 2017, the B.C. government under the NDP announced a complete ban of the grizzly bear trophy hunt in response to widespread public opposition. This decision was welcomed by the David Suzuki Foundation, which has campaigned for over a decade to end the killing of grizzly bears. The Foundation released a number of reports showing that grizzly bear populations have been poorly managed in the province. Successive governments have failed to adequately protect grizzly bear habitat as well as address pervasive overmortality in hunted populations.

Our latest report addresses trafficking of grizzly bears killed by non-resident hunters in British Columbia. For decades, hundreds of Americans and Europeans have chosen British Columbia as the destination of choice to kill a grizzly bear during the spring or fall hunting season. These visiting hunters have killed about one-third of the grizzly bears shot in the provincial trophy hunt going back decades. This makes foreign trophy hunters one of the largest sources of grizzly bear mortality in B.C. Many of the bears killed by these hunters are exported out of British Columbia as “trophies”: heads, pelts, teeth, claws and other items.

Some countries have attempted to restrict the trade and trafficking of grizzly bears from British Columbia. For example, in 2004, the European Union banned importation of grizzly bears taken from British Columbia, citing poor management of the species. However, our analysis reveals that, despite this prohibition, trade and trafficking of grizzly bears and grizzly bear parts from B.C. has remained widespread, in contravention of EU policy.

The hope is that the B.C. government's recent decision to halt the trophy hunt will end trade and trafficking of grizzly bears from the province to other countries. However, as our report reveals, there is alarming evidence that B.C. and federal Canadian authorities helped to facilitate the trade in grizzly trophies, despite the EU ban. Questions remain about the ability of government agencies to accurately monitor the movement of other wildlife species killed in Canada.

British Columbia is unique in that grizzlies still inhabit much of the province, even though they have been eliminated from almost all of their historical territory across the planet. That means we have a global responsibility to protect this iconic species.

— David Suzuki, PhD

Scientist and co-founder of the David Suzuki Foundation



INTRODUCTION

Trophy hunted grizzly bear carcass with head, fur, and front claws removed, discovered by wildlife photographer Ian McAllister.

PHOTO © PACIFIC WILD/
IAN MCALLISTER

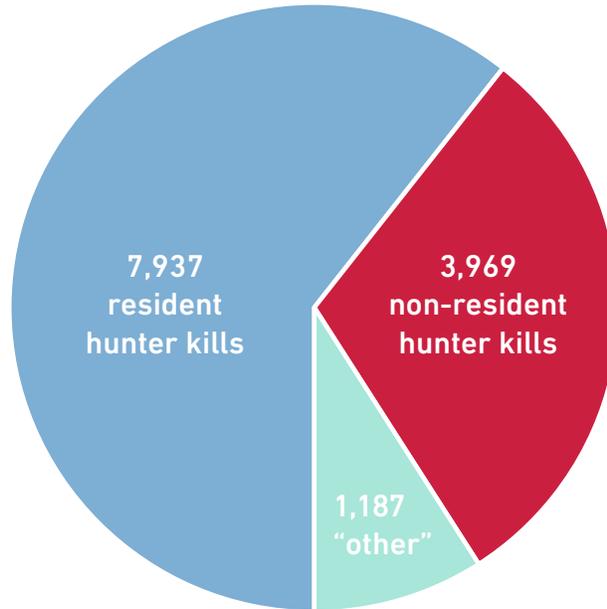
IN MAY 2008, TWO SPANIARDS travelled to British Columbia to hunt grizzly bears. As required by law, the brothers from Barcelona booked a guided hunt, on a luxury yacht with North Coast Adventures. Five days later, Gabriel Perez Maura and his brother, Alvaro, had shot two grizzly bears and three black bears. One of the grizzlies is the now-famous Apple River bear, the largest Canadian “common grizzly bear”^a ever killed by a hunter, and the 13th largest *Ursus arctos* ever taken by a hunter in North America.¹

For decades, hundreds of non-resident hunters have chosen British Columbia as the destination of choice to kill a grizzly bear during the spring or fall hunting seasons. This non-resident grizzly bear hunt has accounted for approximately one-third of the annual reported grizzly bear deaths in B.C., making it one of the largest sources of reported grizzly bear mortality.

The story of the Maura brothers’ hunting exploits has been widely publicized, because the grizzly bear Gabriel shot was so unusually large. It was covered by the *Vancouver Sun*, and Gabriel’s autobiographical account of the experience is prominently displayed on the North Coast Adventures website.² It’s a story that is as puzzling as it is extraordinary, because in January 2004, more than four years before the Maura brothers killed their grizzly bears, the European Union had banned grizzly bear hunting trophy imports

^a The term “common grizzly” is not a biological or zoological one. It is used by Safari Club International to differentiate grizzly bear trophies originating in Yukon, non-coastal B.C., Alberta and the lower 48 states from “Alaskan brown bears” along the west coast of Alaska and B.C., and from “barren ground grizzly bears” in Northwest Territories and Nunavut. According to COSEWIC, *Ursus arctos* (common name, “grizzly bear”) is a single species that occurs in many parts of the world, including Canada and the United States.

HUMAN-CAUSED GRIZZLY BEAR MORTALITY IN BRITISH COLUMBIA, 1975–2016



from British Columbia. Why would these wealthy Spaniards choose to hunt grizzly bears in B.C. rather than Alaska or Yukon or Northwest Territories when it would have been unlawful for them to take their trophies home? Finally, their story also appears to contradict a claim by the Guide Outfitting Association of British Columbia that hunters from the European Union no longer came to kill B.C.'s most sought after, and controversial, hunting trophy. Instead, the story of the Maura brothers' grizzly hunt indicates that, despite a ban on importation of grizzly hunting trophies into the European Union, residents of Europe continued to hunt grizzly bears in B.C. right up until the 2017 announcement by the provincial government that the grizzly bear trophy hunt would be banned.

What remains little understood is how many residents of the European Union continued to hunt B.C. grizzly bears between 2004 and 2015—with the implicit support of successive provincial and federal governments, and the Guide Outfitter Association of B.C.—and whether these European hunters were able to unlawfully repatriate their trophies into the EU.

One of the grizzlies killed by the brothers from Barcelona is the now-famous Apple River bear, the largest Canadian “common grizzly bear” ever killed by a hunter, and the 13th largest *Ursus arctos* ever taken by a hunter in North America.



GRIZZLY BEAR TROPHY HUNTING IN CANADA

Grizzlies in Knight Inlet, B.C.

PHOTO COURTESY
RAY MORRIS/FLICHR
CREATIVE COMMONS

THE GRIZZLY OR BROWN BEAR (*Ursus arctos*) is one of the most sought after—and expensive—big game hunting trophies in the world. Brown bears are hunted over most of the species' current range, including Canada, Russia and in the state of Alaska. Big game hunters pay US\$20,000 or more for the assistance of an experienced guide outfitter to find, stalk and kill a member of the largest terrestrial bear species on the planet.

Trophy hunting has been by far the largest source of reported mortality for grizzly bears in Canada. Because B.C. has more than half of Canada's grizzly bears, and had a booming trophy hunting industry, it has been by far the largest source of hunter-killed grizzlies in Canada.³ Except for a brief moratorium in the spring of 2001, grizzly bears have been hunted in British Columbia since before European settlement. Humans have killed approximately 14,000 B.C. grizzly bears since the provincial government began tracking mortality in 1975.⁴ Licensed hunters are responsible for approximately 87 per cent, or 12,026, of the reported grizzly bear mortalities in B.C., an average of 297 each year for more than four decades.⁵

Before the recent ban was announced, grizzly bears could be killed either by hunters who live in B.C. (i.e., residents) or non-resident hunters who visited B.C. for the purpose of bagging a grizzly bear trophy. Roughly one-third of the reported human-caused grizzly bear mortalities in B.C. were at the hands of non-resident hunters,⁶ almost twice as many as have been killed for all non-hunting reasons (poaching, defence of life and property, collision with vehicles, etc.).⁷

Trophy hunting has been by far the largest source of reported mortality for grizzly bears in Canada. Because B.C. has more than half of Canada's grizzly bears, and a booming trophy hunting industry, it has been by far the largest source of hunter-killed grizzlies in Canada.

All non-resident hunters wishing to hunt most big game in British Columbia must be accompanied by a registered guide outfitter, or, prior to grizzly bears being managed through Limited Entry Hunting, by a licensed resident hunter who held a non-commercial "permit to accompany" a non-resident hunter. The vast majority of non-resident grizzly bear hunters were foreign nationals who hired guides.

Guide outfitter licences are issued annually and authorize the holder to lead hunts of particular species in designated areas. These areas are designated Wildlife Management Units or a portion or zone of an MU. The guide licence must be endorsed by the holder of the guiding territory with a certificate for the same area. Only one guide outfitter (plus an assistant) is authorized to guide in a guide area at a time. Before the ban, licences also set quotas for grizzly bears; that is, the maximum number of grizzlies that clients of a guide outfitter could kill in the outfitter's guiding area during the licence year.

Pricing and License Details

Spring Grizzly Bear Combo (April 15 to May 31): 1 Grizzly Limit / 2 Black Bear limit:

- 7 day hunt requires average physical ability - hiking at sea level
- Hunt includes one coastal grizzly, one coastal black bear, and one wolf
- Cost: \$20,000 US + \$1,000 tax per grizzly hunter - minimum 2 hunters, or a single hunter may be possible with 3 black bear hunters booked on the same hunt at the rate of \$8,000 US+ \$480 tax per hunter for one black bear and one wolf, 2 x 1 guided
- Additional Trophy Fee payable of \$4,000 US + \$240 tax per Grizzly Bear "wound or kill"
- No Trophy Fee for wolf -. Optional second black bear can be harvested with additional \$3,000 + 6% tax "wound or kill".
- Cougar option with species license trophy fee \$2,000 US + 5% tax "wound or kill"
- Hunt will be guided 1x1 for grizzly with outfitter also available as additional guide for additional hunters or observers
- Observer rate of \$3,500 US + \$175 tax

Fall Grizzly Bear Combo (Oct 1 to Nov 15) 1 Grizzly Limit / 2 Blacks / 2 Bucks / 3 Wolves

- Hunt conducted along salmon spawning rivers
- Hunt requires low physical ability - walking and 4-wd travel to blinds to spot and stalk
- Hunt includes 8 days / 7 nights for one grizzly, one black bear, one Columbia black-tail buck, and one wolf
- Cost: \$18,000 US + \$900 tax each hunter - minimum 2 hunters - 1x1 guided
- Additional Trophy fee of \$4,000 US + \$200 tax per grizzly bear "wound or kill"
- No T.F. of \$3,000 for second black bear - no T.F. for wolf
- T.F. of \$1,000 US + \$50 tax for second buck + \$134 Cdn species license
- Combo hunter rate of \$10,000 US + \$500 tax - 2x1 guided for 1 BB, 1 buck, and wolf
- Non-hunter rate of \$3,500 US + \$175 tax applies per observer with 2 grizzly hunters
- Mtn. Goat option may be possible in some areas until Nov. 30th for \$9,000 US + \$450 tax
- Cougar option as incidental harvest also possible. T.F. \$3,000 US + \$150 tax + \$246 Cdn species license
- Migratory Wingshooting for seaducks available after Oct 7th - requires \$17 Cdn license

Hunts to be booked with a 60% deposit and on a space available basis, (phone for available dates.) All rates based on a minimum number of hunters per hunt. Non-resident hunting license fee and GOABC preservation fund \$305.00 Cdn plus species tags in Cdn funds, plus PST tax of 7% as follows...

Source: Example of hunt packages available online, accessed June 23, 2018

Because trade in grizzly bear body parts is regulated by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), successful non-resident grizzly bear hunters had to apply for a CITES export permit if they wished to transport their trophy out of Canada.

The B.C. and federal governments have issued almost 2,000 CITES permits for grizzly bear hunting trophies since the B.C. provincial government reinstated the hunt in 2001.

Until the grizzly trophy hunt was banned in 2017, the number of grizzlies that guide outfitters were permitted to hunt each year was regulated through an annual quota system. In 2012, provincial authorities switched to a system that gave licensed guide outfitters a share in a five-year allocation period (2012-2016), during which they were allowed annual quotas to kill up to a certain number of grizzly bears with a maximum total for the five-year period. An outfitter could choose to exceed an annual quota, as long as it was less than 30 per cent of the cumulative five-year quota and the number of kills over the five-year allocation did not exceed the total sum allotted for the period.

Once a non-resident hunter booked their licensed guide, they were required to purchase a provincial hunting licence and a grizzly bear species licence. The cost of a licence for a non-resident to hunt a grizzly bear was either \$1,105 or \$1,210, depending on whether the hunter was a non-resident (i.e., a Canadian citizen or permanent resident, or anyone whose primary residence is in Canada but not in B.C.) or a non-resident alien (i.e., anyone who is not a B.C. resident or non-resident).⁸ The cost of a successful guided grizzly bear trophy hunt for the 2016 season, including tax and royalty and trophy fees, ranged from US\$14,000 to \$24,000. Prices varied depending on the length of the hunt, species sought and individual guide outfitter.

If the hunt was successful and the hunter killed a grizzly bear, the species licence was cancelled immediately and reported through the government's "Compulsory Inspection System". The Compulsory Inspection System is the primary means by which the government collects and maintains an annual record of all grizzly bear mortalities from trophy hunting in the province. As part of the Compulsory Inspection System, both the guide outfitter and the non-resident hunter were required to report, in a formal signed declaration, where the grizzly bear was killed. B.C. government regulations required hunters to also present the grizzly's head and feet, as well as evidence of its sex.⁹ Because trade in grizzly bear body parts is regulated by the Convention on International Trade in Endangered Species of Wild Fauna and Flora, successful non-resident grizzly bear hunters had to apply for a CITES export permit if they wished to transport their trophy out of Canada.

The B.C. and federal governments have issued almost 2,000 CITES permits for grizzly bear hunting trophies since the B.C. provincial government reinstated the hunt in 2001.



THE GLOBAL TRADE IN GRIZZLY BEAR TROPHIES

THE ONLY REASON WE KNOW ANYTHING AT ALL about the global trade in grizzly bear hunting trophies is because of the Convention on International Trade in Endangered Species of Wild Flora and Fauna. In 1973, the world's nations signed an international agreement to regulate trade in wild animals and plants. It strives to ensure that international trade in biodiversity does not threaten survival of species that are rare or in decline due to human impacts. One hundred and eighty-one states are party to, and therefore bound by, CITES, including Canada, the United States and all the countries of the European Union.

CITES-listed animal and plant species receive different degrees of regulation depending on which of three appendices they are listed in under the Convention. Appendix I includes species threatened with extinction, for which trade must be subject to stricter regulation, and can only be authorized in exceptional circumstances for specimens of wild origin. Commercial trade in wild-taken specimens of Appendix I-listed species is generally not allowed.

Species listed in Appendix II are not necessarily threatened with extinction but may become so unless trade is strictly regulated. Appendix II also includes so-called "look-alike species," which are controlled because of their similarity in appearance to other regulated species in Appendix I, thereby facilitating more effective control of these threatened species. Appendix III contains species that are subject to regulation within the jurisdiction of a CITES party and for which the co-operation of other CITES parties is needed to prevent or restrict their exploitation.

Canada, the United States and all the countries of the European Union are bound by the rules of the Convention on International Trade in Endangered Species (CITES).

PHOTO: PRASIT RODPHAN/ISTOCK

Initially, most of the bear family, *Ursidae*, was provided a modest level of protection. But the conservation status of seven bear species has deteriorated and/or market demand has increased since CITES was signed in 1973.

CITES LISTINGS FOR BEARS WORLDWIDE		
Species	Appendix	Locations
Giant Panda	I	China
Sun Bear	I	Bangladesh, Brunei Darussalam, Cambodia, China, India, Indonesia, Lao People's Democratic Republic, Malaysia, Myanmar, Thailand, Viet Nam
Sloth Bear	I	Bangladesh, Bhutan, India, Nepal, Sri Lanka
Spectacled Bear	I	Argentina, Bolivia, Colombia, Ecuador, Panama, Peru, Venezuela
American Black Bear	II	Canada, Mexico, USA
Brown Bear	I	Bhutan, China, Mexico, Mongolia
Brown Bear	II	All populations except Bhutan, China, Mexico, Mongolia
Himalyan Brown Bear	I	China
Himalyan Brown Bear	II	Afghanistan, India, Kazakhstan, Kyrgystan, Nepal, Pakistan, Tajikistan, Uzbekistan
Polar Bear	II	Canada, Greenland, Norway, Russia, Svalbard and Jan Mayen Islands, USA
Asian Black Bear	I	All extant populations

Initially, most of the bear family, *Ursidae*, was listed in Appendix II of CITES, which provided a modest level of protection for all bear species around the world. But seven bear species have since been transferred to Appendix I as their conservation status has deteriorated and/or market demand has increased since CITES was signed in 1973. These include the Giant Panda (*Ailuropoda melanoleuca*), sun bear (*Helarctos malayanus*), sloth bear (*Melursus ursinus*), spectacled bear (*Tremarctos ornatus*), Himalayan brown bear (*Ursus arctos isabellinus*), Asian black bear (*Ursus thibetanus*) and the Bhutanese, Chinese, Mexican and Mongolian populations of brown bear (*Ursus arctos*). Appendix I provides these species with a higher level of protection, banning all trade in the species for commercial purposes and placing “dual controls” over remaining trade (e.g., sport-hunted trophies may be imported as long as the exporting and importing countries have both issued permits for the species). Grizzly bears in Canada are listed on Appendix II of CITES because they look similar to specimens from the small and/or at-risk populations in Bhutan, China, Mexico and Mongolia, which are listed on Appendix I of the Convention.



Brown bears at Knight Inlet, B.C. PHOTO COURTESY TIMNUTT/FLICHR COMMONS

Ostensibly, the CITES permitting system facilitates international cooperation in conservation and monitoring of species regulated under the Convention. Permits are issued only if a country's management and scientific authorities determine that the trade in a particular species is legal and does not threaten the species' survival in the wild. The use of standardized permit forms allows inspection officials at ports of export and import to verify that CITES-regulated specimens are properly documented. They also facilitate collection of species-specific trade data, which are used to create annual reports. These data are used to determine global trends in trade and ensure that the trade in wildlife is sustainable. Trade monitoring has created a substantial body of information on the management and use of CITES species worldwide. However, in the case of monitoring grizzly bear trophy item exports from B.C., these data and processes are not particularly useful.

Environment Canada's Wildlife Enforcement Directorate is responsible for enforcement of the *Wild Animal and Plant Protection and Regulation of International and Interprovincial Trade Act*, which is the federal law that governs the manner in which CITES is implemented. A federal agency, called the Scientific Authority, coordinates CITES activities in Canada, and is responsible for writing non-detriment findings" (NDFs) reports for CITES-listed species. Canada has prepared NDFs to document the considerations of the Scientific Authority for some of the most commonly exported Canadian species, including polar and the grizzly bears.¹⁰ In the opinion of the Canadian federal government, "the export of legally hunted grizzly bears is considered non-detrimental" to survival of the species in the wild. Despite criticism about the lack of transparency and inadequate peer-review, these NDFs allow Canadian authorities to issue CITES export permits that facilitate the export of grizzly bear trophies from British Columbia and the rest of Canada.¹¹

Generally, grizzly bear trophies can be exported from Canada by trophy hunters to their home country if an appropriate CITES export permit is obtained. The hunter need only apply to the government in the province or territory in which the grizzly was killed to obtain the appropriate export permit. CITES headquarters in Ottawa can also dispense permits. The fee to obtain a CITES export permit in B.C. is \$30.¹² Canada issues approximately 250 CITES export permits annually for grizzly bear hunting trophies, many of which originate in B.C.¹³

Trade monitoring has created a substantial body of information on the management and use of CITES species worldwide. However, in the case of monitoring grizzly bear trophy item exports from B.C., these data and processes are not particularly useful.



Ministry of Environment

CITES PERMIT APPLICATION

FW-33/FW-36

This application is for individuals and organizations exporting certain species from British Columbia. (Refer to Instructions for CITES applications below.)

1. APPLICANT: person applying for and paying for this permit

Applicant's Legal Name / Organization (if applicable) / Mailing Address (include postal code) / Telephone #

2. EXPORTER: ONLY TO BE COMPLETED WHEN PERSON OTHER THAN APPLICANT OR CONSIGNEE IS ACCOMPANYING THE WILDLIFE OUT OF CANADA

Exporter's Legal Name / Organization (if applicable) / Mailing Address (include postal code) / Telephone #

3. CONSIGNEE: person receiving the wildlife

Consignee's Legal Name / Organization (if applicable) / Mailing Address (include postal code) / Telephone #

4. PURPOSE: Personal (fee \$30) Commercial (fee \$55)

5. Date permit required: **6. Permit Pickup location:**

7. CONTENTS OF SHIPMENT: Species: _____

Description of wildlife: _____

Hunter's Name _____ Resident Hunter # _____ Non-Resident Licence # _____

Species Tag # _____ Compulsory Inspection # _____ Status # _____ Fur Trader Licence# _____ Trapline # & Trapping Licence # _____

Please attach a separate sheet if necessary

8. CONTENTS OF SHIPMENT: Species: _____

Description of wildlife: _____

Hunter's Name _____ Resident Hunter # _____ Non-Resident Licence # _____

Species Tag # _____ Compulsory Inspection # _____ Status # _____ Fur Trader Licence # _____ Trapline # & Trapping Licence # _____

*** If wildlife was hunted by a different hunter other than in Box 7, complete a separate CITES application**

The information required by this form and any documents you provide with it are collected under the authority of the *Freedom of Information and Protection of Privacy Act* to process your permit application under the *Wildlife Act*. This information will be used to verify your eligibility for the permit you are seeking and for other purposes related to the administration of the *Wildlife Act*. If you have any questions about the collection or use of this information, contact the Director of Wildlife.

ACKNOWLEDGEMENT:

By signing this application, the applicant certifies that the information provided in this application is true.

Signature of Applicant

Date of Application

It is an offence to knowingly make a false statement in order to obtain a permit. Violations may result in prosecution under the *Wildlife Act*, refusal of future permit requests or both. Any permit obtained knowingly using false information is void.

For further information: <http://www.env.gov.bc.ca/pasb/>
Victoria 952-0932; Elsewhere in B.C. 1-866-433-7272

June 12, 2009

PROHIBITING IMPORTATION OF GRIZZLY BEAR TROPHIES FROM B.C.



IF YOU'RE A EUROPEAN HUNTER, not all Canadian grizzly bears are created equal. Hunters from EU member states have always been able to repatriate their legally harvested grizzly bear hunting trophies from Yukon, Northwest Territories and Nunavut. Since 2004, it is unlawful to import grizzly bears harvested in B.C.

The European Union is the second largest hunting trophy importer in the world, behind the United States. The global trade of tens of thousands of endangered plant and animal species is regulated by CITES, which lists items that may not be freely traded, transported, collected or kept. Such activities are subject to EU rules. Trade in some species is completely prohibited, while permits or certificates are needed in other cases.

Implementation of CITES within the European Union is governed by Council Regulation (EC) No. 338/97, which is directly applicable in all 28 member states. The species covered by Regulation (EC) No 338/97 are listed in four annexes (A to D).¹⁴ Although all Canadian grizzly bears are listed in Appendix II of CITES, which allows for regulated trade in hunting trophies, the European Commission has listed all brown (i.e., grizzly bears) on Annex A of *Council Regulation (EC) No 33/97*, the EU Wildlife Trade Regulations, which roughly corresponds to CITES Appendix I and generally prohibits commercial trade.¹⁵ In practical terms, this means importing any *Ursus arctos* specimens into the EU requires an export permit from the country of origin or re-export *and* an import permit from the member state of destination, which must be presented to the customs office at the first point of introduction to the EU. In the absence of documents, specimens may be seized and subsequently confiscated.

Grizzly feasting on
salmon, Bella Coola, B.C.

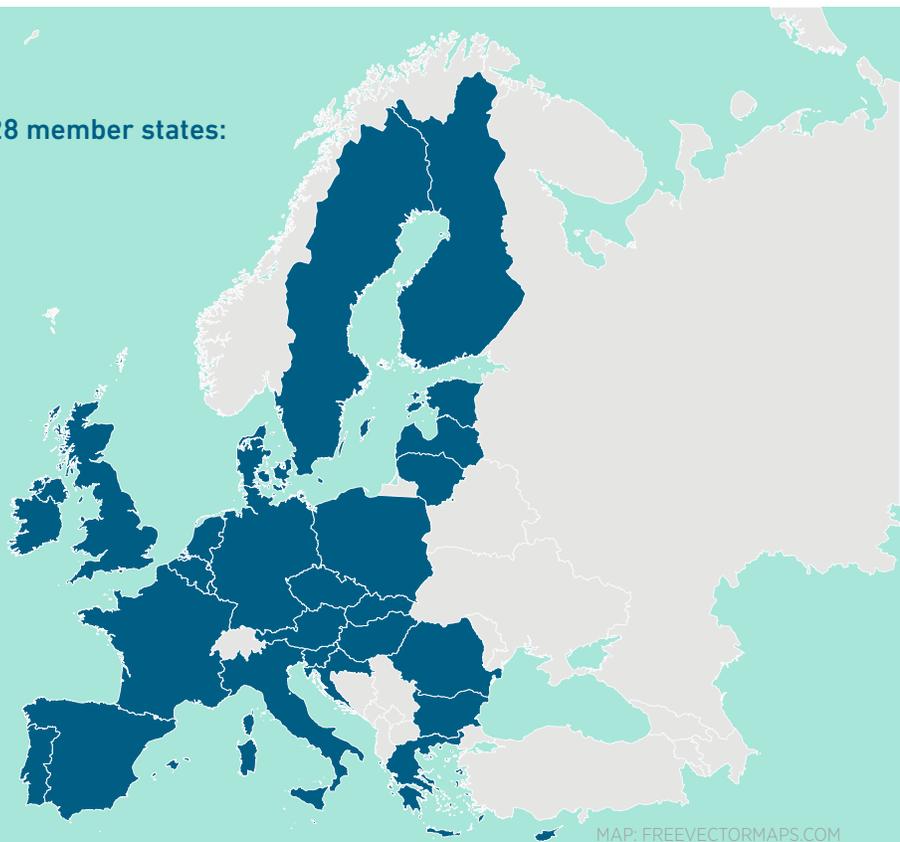
PHOTO COURTESY STEPHEN
MATTUCCI/FLICKR COMMONS

Article 4(6) of Regulation (EC) No 338/97 provides the European Commission with the legal authority to prohibit imports of certain species from certain countries.¹⁶ Such prohibitions are usually at the direction of the EU's Scientific Review Group (SRG). The SRG examines scientific questions relating to the application of EU regulations. They are responsible for providing a scientific opinion about whether or not certain imports comply with the conservation requirements of the regulations. A negative opinion is formed if the import is deemed to have a harmful effect on the conservation status of the species in its place of origin. Once a negative opinion is issued, import permits cannot be granted for the species from that particular state, and specimens cannot be imported.

In 2004, the EU's SRG formed just such a negative opinion about B.C.'s grizzly bears. The basis for its decision was that there was insufficient evidence indicating that the B.C. government's grizzly bear management program was robust enough to ensure that overharvest was not occurring. Grizzly bear management in general, and the grizzly bear hunt in particular, always has been controversial in B.C. To clear the air, the B.C. government convened, in 2001, an independent panel of bear experts to review B.C.'s harvest management strategy. Two years later, the panel released its report, *Management of Grizzly Bears in British Columbia: A Review by an Independent Scientific Panel*. The report concluded that a lack of adequate data meant it was impossible to determine whether or not overharvest was occurring, and so made 19 recommendations on how to improve grizzly bear population estimates, risk management in grizzly bear harvests, administrative processes for managing grizzly bears, habitat issues related to grizzly bears (particularly the designation of protective Grizzly Bear Management Areas), and research needs.¹⁷ In November 2003, B.C.'s minister of water, land and air protection sent a letter to the SRG that committed to implementing the recommendations and revising the provincial Grizzly Bear Conservation Strategy by the end of 2005.¹⁸

The European Union is composed of 28 member states:

- | | |
|----------------|----------------|
| Austria | Italy |
| Belgium | Latvia |
| Bulgaria | Lithuania |
| Croatia | Luxembourg |
| Cyprus | Malta |
| Czech Republic | Poland |
| Denmark | Netherlands |
| Estonia | Portugal |
| Finland | Romania |
| France | Slovakia |
| Germany | Slovenia |
| Greece | Spain |
| Hungary | Sweden |
| Ireland | United Kingdom |



The European Union’s Scientific Review Group (SRG) concluded that the B.C. government had not adequately implemented the recommendations of the independent scientific review panel, and banned the import of grizzly bear hunting trophies until the B.C. government implemented the panel’s recommendations, or at the very least provided a clearer timeframe for this work to be done.

SPECIES INCLUDED IN ANNEX A AND ANNEX B TO REGULATION (EC) NO 338/97 FOR WHICH THE INTRODUCTION OF HUNTING TROPHIES INTO THE EU IS PROHIBITED			
Species	Sources covered	Specimen(s) covered	Countries of origin
<i>Capra falconeri</i> (Markhor)	Wild	Hunting trophies	Uzbekistan
<i>Hippopotamus amphibius</i> (Hippopotamus)	Wild	Hunting trophies	Cameroon (except for 10 hunting trophies), Mozambique
<i>Canis lupus</i> (Grey wolf)	Wild	Hunting trophies	Belarus, Mongolia, Serbia, Tajikstan, FYRoM, Turkey
<i>Panthera leo</i> (Lion)	Wild	All (including hunting trophies)	Benin, Burkino Faso, Cameroon, Ethiopia
<i>Ursus arctos</i> (Brown bear)	Wild	Hunting trophies	Canada (British Columbia), Kazakhstan
<i>Ursus maritimus</i> (Polar bear)	Wild	All (including hunting trophies)	Canada (subpopulations Baffin Bay, Kane basin)
<i>Ursus thibetanus</i> (Himalayan black bear)	Wild	Hunting trophies	Russia
<i>Loxodonta africana</i> (African elephant)	Wild	Hunting trophies	Cameroon, Mozambique, Tanzania
<i>Falco cherrug</i> (Saker falcon)	Wild	All (including hunting trophies)	Bahrain

Two months later, concerned about the slow and ineffectual efforts of the B.C. government to improve its grizzly bear management system, the SRG concluded that the B.C. government had not adequately implemented the recommendations of the independent scientific review panel, and banned the import of grizzly bear hunting trophies until the B.C. government implemented the panel’s recommendations, or at the very least provided a clearer timeframe for this work to be done.

Ultimately, the SRG was skeptical about the sustainability of grizzly bear management in British Columbia, particularly the possibility that trophy hunting was contributing to mortality levels above sustainable limits. It was the first and only case of an SRG decision being made for a region or province rather than a country.¹⁹

The B.C. and Canadian governments strongly opposed the EU ban and wrote their own non-detriment findings to defend the B.C. bear management regime, but they were unable to sway the SRG to change its collective mind. Today, 14 years later, there is a growing body of evidence to support the SRG’s decision. The David Suzuki Foundation has published several reports critiquing B.C.’s management of grizzly bears, including one in 2014 called *Failing B.C.’s Grizzlies: Report Card and Recommendations*. *Failing B.C.’s Grizzlies* gave the B.C. government low grades for its failure to implement its own grizzly bear conservation strategy, which included many of the same concerns expressed by the SRG.

In 2013, Kyle Artelle and other biologists published a scientific analysis of the B.C. government's ability to ensure grizzly bear mortality remained below acceptable limits prescribed by government policy.²⁰ The results were damning: between 2001 and 2011, 26 of 42 grizzly bear population units reached or exceeded total (male and female) mortality thresholds, and 24 GBPUs reached or exceeded female mortality thresholds. Although non-hunting mortality contributed to these over-mortality events,

the authors concluded that the easiest way to avoid them would have been to reduce hunting mortality. It is exactly this lack of transparency and unsustainable management that the SRG was concerned about when it formulated a negative opinion for B.C. in 2004.

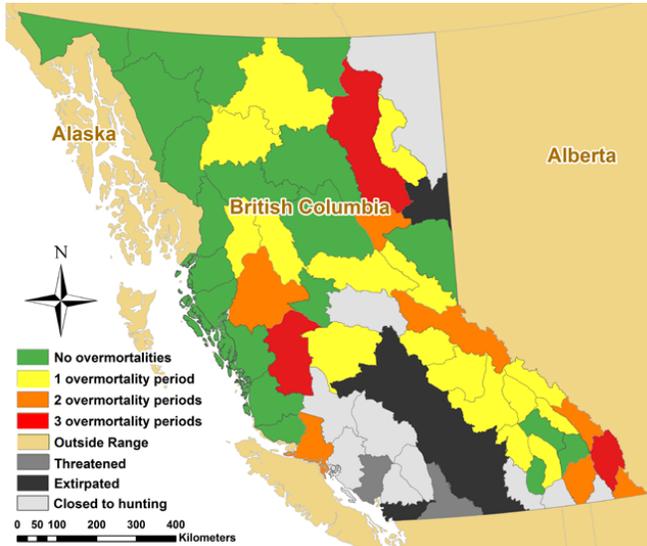
More recently, the SRG's 2004 negative opinion was bolstered by none other than B.C.'s auditor general. In October 2017, the Office of the Auditor General of British Columbia released a damning report entitled *An Independent Audit of Grizzly Bear Management*. "Grizzly bear populations in some areas of B.C. are increasing," auditor general Carol Bellringer wrote, "but this is likely happening independently from an adequate management framework."²¹

Bellringer and her team found that the Ministry of Environment and Ministry of Forests, Land and Natural Resource Operations^b hadn't fulfilled many of their commitments, including developing a grizzly bear management plan, securing key grizzly bear habitats

and implementing a recovery plan in the North Cascades and an adequate inventory and monitoring strategy for grizzly bears in B.C. While the report concluded that habitat degradation is the greatest risk to B.C.'s grizzly bear population, management of the grizzly bear hunt received a stern rebuke.

"Reviews of grizzly bear hunting by external experts in both 2003 and 2016 ... called for area specific management objectives, which have not yet been established." Instead, the government relies on its Grizzly Bear Harvest Management Procedure (2012), which is supposed to regulate the grizzly bear hunt to avoid a decline in that population. However, the report concluded, "this procedure does not adequately account for uncertainty in populations and unreported mortalities, and is not transparent as to how the [MFLNRO] considers uncertainty when allocating hunting licences." To make matters worse, the report concluded, "there is no organized inventory and limited monitoring of grizzly bear [populations]."²²

These conclusions echo those raised by the EU SRG in 2004, which is why, a month after the auditor general's report was released, the SRG confirmed yet again the prohibition against importing grizzly bear hunting trophies from B.C. into the EU.²³ As a result, EU member states must reject all import permit applications for as long as the restriction is in place. This means that grizzly bear parts are not allowed to be imported into the EU for commercial purposes, and hunting trophies from British Columbia are prohibited, too.



The results of the biologists' scientific analysis were damning: between 2001 and 2011, 26 of 42 grizzly bear population units reached or exceeded total (male and female) mortality thresholds, and 24 GBPUs reached or exceeded female mortality thresholds. SOURCE: ARTELLE ET AL., 2013

^b The Ministry of Environment is now the Ministry of Environment and Climate Change, and the Ministry of Forests, Lands and Natural Resource Operations is Ministry of Forests, Lands, Natural Resource Operations, and Rural Development.



EUROPEAN HUNTERS CONTINUED TO KILL B.C. GRIZZLIES

IN 2013, SCOTT ELLIS, EXECUTIVE DIRECTOR of the Guide Outfitters Association of British Columbia, claimed, “There are now zero grizzly bear hunters from Europe” travelling to B.C. to hire guide outfitters and shoot grizzly bears. Despite Ellis’s emphatic claim — part of a campaign deploring the negative economic impacts of the EU suspension on the guide outfitting industry — it’s clear that residents of EU member states continued to pay big bucks to hunt grizzly bears in B.C. from 2004 to 2015. The Maura brothers, of course, killed two grizzly bears in Loughborough Inlet, on the west coast of British Columbia, in spring 2008, four years after the SRG implemented the ban.

It turns out the Maura brothers weren’t the only ones, and the evidence suggests EU residents have been coming to B.C. every year since 2004 for the chance to kill a grizzly bear. Figuring out exactly how many is a tricky business. The only method available to understand the trade in grizzly bear parts is the CITES permitting system described above. The first place to look is the CITES Trade Database, which, as of 2013, contained more than 13 million records of trade in wildlife for more than 34,000 species. A million records are added every year. These records are the result of annual reports submitted by the signatories to CITES. Each record includes the year of export or import, description of the item (skin, skull, claw, body, hunting trophy, etc.), and the “purpose of transaction,” which is the reason the item(s) are being transported (commercial, personal, educational or hunting trophy). These terms are somewhat imprecise, and are used inconsistently. For instance, what one jurisdiction describes as a “skin” and a “skull”, another jurisdiction will describe as a single “hunting trophy”. A hunting trophy can be exported for commercial purposes if it’s being bought and sold; likewise, a hunter can

Grizzly habitat in Loughborough Inlet, where the Maura brothers killed the grizzlies.

PHOTO PROVINCE OF B.C.

send his hunting trophy to a friend or family member and call the purpose of transaction “personal” rather than “hunting trophy”. So a grizzly can be shot in B.C. in May and the trophy exported to another country in June as a “skin and skull” being transported for “personal” or “commercial” purposes.

During the 12 years after the EU suspended importation of B.C. grizzly bears in January 2004, the CITES Trade Database indicates that the Canadian CITES Management Authority granted export permits for 294 grizzly bear trophy items (skulls, skins, hides, claws, trophies, baculum, claws) destined for 19 EU member states, an average of 21 trophy items each year.²⁴ During the same period, EU member states imported 112 grizzly bear trophy items. Why does it appear that more trophy items are exported to the EU than imported into the EU? The difference in these numbers is in large part the result of different methodologies used by different CITES management authorities. Although CITES recommends that countries track “the actual trade that took place” (i.e., the number of permits actually used),²⁵ the Canadian CITES Management Authority only records the number of export permits issued, not the number of permits that were actually used.²⁶ So some of the trophy items that received export permits may not have been exported, or if they were, they were not legally imported (i.e., were smuggled) into the destination country. Another issue is that the Canadian CITES Management Authority tends to describe a single grizzly bear hunting trophy as the separate parts of which it consists. So Canada tends to describe the trophy items as a bone, a skull and a hide (three items), while Germany will describe the whole package as one trophy.

As you can see, this makes reconciling imports and exports between countries difficult, if not impossible, using the CITES Trade Database alone. The other reason the database is not particularly useful for trying to figure out how many B.C. grizzly bear hunting trophies were traded between B.C. and EU member states is because it only records the *country* of import and export. To determine how many B.C. grizzly bears residents of European Union nations killed, we used the federal Access to Information Process and the B.C. Freedom of Information process to obtain CITES export permits “for all successful non-resident grizzly bear hunters” since the EU suspended importation of B.C. grizzly bear hunting trophies in January 2004 (i.e., between 2004 and 2015). We also contacted each EU member state for information about grizzly bear trophy items that had been imported during this period.

The results were illuminating. The B.C. government provided about 1,700 export permits issued between 2004 and 2015 for grizzly bear trophy items, and the Canadian government provided around 1,125. Many of these permits were duplicates (i.e., copies of the same permits were provided by both governments), but the B.C. government provided a more complete set of records. In total, 47 export permits were issued for B.C. grizzly bear parts bound to EU member states between 2004 and 2015. The B.C. government provided 44 of these permits, while the Canadian government provided 19. (Some were duplicates.) A copy of an export permit issued by the B.C. government in 2004 was obtained from the Danish government, though neither the B.C. government nor the Canadian government included it in their records.^c

c I have included in this number four export permits for the Maura brothers’ grizzly trophies, which were exported to the United States in June 2008, and likely received re-export permits to transport them from there to Spain, as well as one export permit for a grizzly bear killed by Machiel Dubbelink, which was exported to the U.S. and then received a re-export permit for transport to the Netherlands.

During the 12 years after the EU suspended importation of B.C. grizzly bears in January 2004, the CITES Trade Database indicates that the Canadian CITES Management Authority granted export permits for 294 grizzly bear trophy items (skulls, skins, hides, claws, trophies, baculum, claws) destined for 19 EU member states, an average of 21 trophy items each year.

There are several reasons this should be construed as the *minimum number* of export permits issued to people who wanted to import B.C. grizzly bear trophy items into the EU between 2004 and 2015. Although both the B.C. government and the Canadian government are required to maintain complete records of the CITES permits they issue, each government was missing some permits the other had: B.C. is missing two, the federal government 26. One was missing from both databases. For obvious reasons, it is impossible to quantify how many additional permits may be missing from both databases. Lise Jubinville, head of Canada's CITES Permit Policy and Operations Unit, wrote in an email that Environment Canada is the "CITES headquarters" for Canada, and is ultimately responsible for maintaining a complete set of records, while the B.C. government (specifically, the Ministry of the Environment and Climate Change Strategy, formerly known as the Ministry of Environment) has been delegated to issue CITES permits on Environment Canada's behalf.²⁷ "The accuracy of our records, especially when you go back in time, is not 100%," she wrote, though she did say that improvements have been implemented since she started in 2010.²⁸

This export permit was issued for a grizzly bear killed by Machiel Dubbelink, which was exported to the U.S. and then received a re-export permit for transport to the Netherlands. However, the application for an import permit was denied by the Dutch CITES Management Authority.

8/9. Scientific name (genus and species) and common name / Nom scientifique (genre et espèce) et nom commun			10. Description of specimens, including marks (age/sex, if live) / Description des spécimens, y compris les marques (âge/sex, si vivant)		11. Appendix / Annexe	12. Source / Source	13. Quantity (incl. unit) / Quantité (et unité)	14. Exported-Quota / Exporté-Quota
A URSUS ARCTOS GRIZZLY BEAR			SALTED AND DRIED HIDE		II	W	ONE (1)	
15a. Country of origin / Pays d'origine	Permit No. / N° de permis	Date (y-a/m/d-j)	15b. Country of last re-export / Pays de provenance		Certificate No. / N° de certificat	Date (y-a/m/d-j)	16. Pre-Convention date / d'acquisition	
CANADA	CA13BCV11157	2013/11/29						
8/9.	10.			11.	12.	13.	14.	

Additionally, it was determined later that the response from Environment Canada/Canada CITES Management Authority was incomplete. Even though it is entirely possible that the purpose of transaction on an export permit for a B.C. grizzly bear killed by an EU hunter was identified as “personal” or “commercial”, the search criteria used to pull the permits was only “hunting trophy”. As a result, there may be relevant permits in the federal CITES Management Authority’s database that were not handed over.

It is also possible that hunters from the EU applied for export permits to transport their hunting trophies to the United States, and from there to their home countries. This isn’t as far-fetched as it might sound. The Maura brothers, who are Spanish citizens and residents, exported their trophies to a taxidermy shop in North Dakota, and there is evidence in the CITES Trade Database that they received export permits from the U.S. Fish and Wildlife Service to transport their trophies to Spain. Whether they did is unknown at this point, though the investigation is ongoing.

A Dutch hunter, Machiel Dubbelink, killed a B.C. grizzly sow in November 2013, and his guide outfitter received an export permit to transport the “salted and dried hide” to a taxidermist in Cody, Wyoming. Eighteen months later, the U.S. Fish and Wildlife Service issued a re-export permit for the Dewey Wildlife Studio to send the “tanned skin of a female” to Dubbelink. The original CITES export permit issued by a permit clerk at the B.C. government reads that, “EXPORT IS FOR PROCESSING TROPHY. TROPHY WILL BE RE-EXPORTED TO HUNTER UPON COMPLETION OF TAXIDERMY. GRIZZLY BEAR IS A HUNTING TROPHY.” Dubbelink lives and works in the Netherlands, a member state of the EU, which prohibited importation of B.C. grizzly bear hunting trophies more than a decade ago.

It’s also possible that B.C. grizzly trophies were exported to Norway or Switzerland—which are not EU member states and therefore don’t prohibit importation of such trophies—and were subsequently transported (perhaps unlawfully) to EU member states by road or rail. From 2004 to 2015, 19 export permits for Switzerland and 33 export permits for Norway were issued for grizzly bear body parts. How many of these were subsequently transported into the EU is unknown.

So, the *minimum* number of export permits issued by Canada for B.C. grizzly bear body parts bound for EU member states is 46—almost four per year between 2004 and 2015. These permits allowed for export of grizzly bear parts to 16 different EU countries. Destinations with the most permits include Spain (six), Germany (six), Great Britain (five) and Netherlands (four). How many of these 46 export permits were for B.C. grizzly bears known to have been killed by hunters from the EU? Twenty-five (54 per cent) of these permits identify the “purpose of transaction” as the transport of a hunting trophy killed by a hunter from the EU. However, there are also 21 permits that identify the “purpose of transaction” as either “personal” or “commercial,” many of which may be hunting trophies that were mistakenly or intentionally misrepresented.

For example, the Maura brothers, a month after their successful hunt, applied for and received CITES export permits for their grizzly bear hunting trophies, so they could transport the hides and skulls to a taxidermist in North Dakota. The purpose of transaction was listed as “commercial”

The *minimum* number of export permits issued by Canada for B.C. grizzly bear body parts bound for EU member states is 46—almost four per year between 2004 and 2015. These permits allowed for export of grizzly bear parts to 16 different EU countries.

rather than “hunting trophy”. According to Lise Jubinville, head of Canada’s CITES Permit Policy and Operations Unit, there was little rigour in ensuring that the permit applications, and ultimately the permits themselves, were an accurate representation of the origin of the grizzly bears in question, the cause of their deaths or the actual purpose of transporting their body parts abroad. Before 2012, CITES management authorities used whatever descriptions and codes applicants wanted, rather than the codes that most accurately reflected the nature of the specimens and the purpose of export. In response to evidence that the Maura brothers applied, in 2008, for a commercial export permit rather than a hunting trophy export permit, Jubinville admitted that it was incorrect. “The purpose code on these permits should probably have been H [for “hunting trophy”], considering they were the results of a hunt and being sent ultimately to the hunter.” Jubinville went on to divulge, “The B.C. permitting office did not (until recently) truly understand the meaning of H [hunting trophy], P [personal] or T [commercial] when used for CITES permits. If they used T, it was likely because the applicant chose to submit a commercial application. The office never questioned why the applicant chose that ... they just issued the permit as they asked.”

Jubinville went on to suggest that the problem is one of ignorance rather than malfeasance. “Most people do not understand the purpose codes ... even CITES authorities of different countries have varying interpretations.” Indeed, the British Columbia Ministry of Environment’s 2014 “CITES Permit Application” (form FW-33/FW-36) provides the applicant only two choices for the purpose of transaction: “personal” (hunting trophies and personal purchases) or “commercial” (any purpose other than personal). The separate purpose code “hunting trophy” is not even an option. One B.C. permit officer stated that hunting trophies could be either personal or commercial, and that the way it is described on the application (as pictured) “is incorrect.”²⁹

Wildlife Act of British Columbia FW-33/FW-36



CITES PERMIT APPLICATION

This application is for use by individuals and organizations exporting certain species from British Columbia.
 It is recommended that a separate CITES application be submitted for each hunter.

Effective January 1, 2014, CITES for Appendix I species only (Polar Bear, Whooping Crane, Sandhill Crane (some subspecies), Peregrine Falcon, Gyrfalcon) must be submitted on the CITES Canada application form and submitted to CITES Canada. More information can be found at <http://www.ec.gc.ca/cites/>.

HOW TO USE THIS FORM

This is a fillable PDF form. You can type your information into this form and submit it or you can print it off and fill it out by hand. Follow these steps to get started:

- 1) **Download and Save** the form to your computer. *Note: If you attempt to enter information into this form while previewing it in your web browser you will not be able to save your information and submit this form.*
Note: Please ensure that this form is saved to your “Desktop” or “Downloads” folder before filling it out.
- 2) **Open** this form with **Adobe Reader** (free download: <http://get.adobe.com/reader/>)
- 3) **Fill out** the form by **typing** in your information. **Required fields are outlined in Red.**
Note: If you do not see the fields outlined in red you may have to click on the Highlight Existing Fields button which is found in the purple information bar at the top of the screen in Adobe Reader.

TYPE OF PERMIT

<input checked="" type="radio"/> Personal Hunting trophies and personal purchases.	\$ 30	<input type="radio"/> Commercial Any purpose other than personal.	\$ 55
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PRIVACY NOTE FOR THE COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION

Personal information is collected by FrontCounter BC under the legal authority of section 26 (c) and 27 (1) of the Freedom of Information and Protection of Privacy Act (the Act). The collection, use, and disclosure of personal information is subject to the provisions of the Act. The personal information collected by FrontCounter BC will be used to process your enquiry or application(s). It may also be shared when strictly necessary with partner agencies that are also subject to the provisions of the Act. The personal information supplied in the application package may be used for referrals or notifications as required. Personal information may be used by FrontCounter BC for survey purposes.

The B.C. Ministry of Environment’s 2014 CITES Permit Application provides only two options: “personal” (hunting trophies and personal purchases) or “commercial” (any purpose other than personal). One B.C. permit officer stated hunting trophies could be either personal or commercial, and the application (pictured) “is incorrect.”

It doesn't require much imagination to think of the problem in another way: Hunters, guide outfitters and taxidermists know full well what the EU regulations are and how the CITES permitting system works, and some of them have figured out how to manipulate the process to their benefit. Grizzly bear body parts identified as a "frozen hide with claw" and a "frozen skull" being transported for a "commercial" purpose belies the fact it was killed by a hunter in the forests of B.C., and should therefore be prohibited from being imported into the EU. Only a keen-eyed customs agent would be able to tell the difference.

Surprisingly, it is not against the law to ask for or propose the wrong purpose code on your CITES permit application. "It skews our reporting slightly," wrote Jubinville, "but there are no legal requirements or restrictions."

Of the 15 export permits marked "personal", 11 were for grizzly bear parts consistent with hunting trophies, things like "hide", "rug", "hide and skull" and "hide with head, paws, claws, skull". The applicants for six of these permits were taxidermists and/or hunting guides with experience serving non-resident hunters in B.C. Without interviewing the hunters themselves, it would be difficult to figure out from these (and perhaps other) permits whether the grizzly bears represented on them were, in fact, killed by hunters, and therefore unlawful to import into the EU. At least four of these non-trophy permits were for bears killed by hunters. It's possible that at least half of these 21 non-trophy permits were actually hunting trophies killed by EU residents. That's an estimated 36 B.C. grizzly bears (three per year) killed by EU hunters with the intent to export them back to the EU between 2004 and 2015.

One would think that as EU hunters and B.C. guide outfitters became more aware of the ban, the number of export permits for B.C. grizzly trophies bound for the EU would decrease over time. But this doesn't seem to be the case: export permits for 11 of the estimated 36 trophies going to the EU were issued between January 2011 and January 2015. While the NDP government's trophy hunting ban will end all non-resident hunting of grizzly bears, it's clear that under the B.C. Liberals, which led the B.C. government for 14 years after the EU ban was implemented, there was no attempt by government officials or guide outfitters to educate EU hunters about their inability to repatriate grizzly bear trophies from B.C., as has been done for American polar bear hunters.

Somewhere, there are dozens of grizzly body parts from bears killed in B.C. by EU residents. But where?

One would think that as EU hunters and B.C. guide outfitters became more aware of the ban, the number of export permits for B.C. grizzly trophies bound for the EU would decrease over time. But this doesn't seem to be the case.

WHERE HAVE ALL THE TROPHIES GONE?



Grizzly bear in the Great Bear Rainforest on B.C.'s coast.

PHOTO PROVINCE OF B.C.

IT'S POSSIBLE ALL OF THESE EXPENSIVE HUNTING TROPHIES were abandoned in B.C. (or the U.S.) by their EU owners after they realized they couldn't lawfully take them home. But anyone who knows a trophy hunter would find it hard to believe that someone would pay several tens of thousands of dollars to fly to B.C., hunt with a guide outfitter and have a taxidermist prepare their trophies without taking them home. The Canadian government, however, has no data on whether the export permits they issued were ever used. Although CITES recommends that the data recorded should reflect "actual trade that takes place," Canada only tracks export permits that are issued. Before the trophy hunt ban, it was not unlawful for EU residents to kill grizzly bears in B.C., nor was it a problem for them to apply for an export permit to take the bear parts home and never do so, which means the existence of an export permit is no guarantee that a hunting trophy was actually exported. At the same time, an export permit allows a hunting trophy to leave Canada, whether or not the appropriate import permits were procured for the destination country.

Other sources of information provide some insight into whether grizzly bear trophies were transported to the EU. The internet provided some photographic evidence of some B.C. grizzly bear trophies killed by EU hunters. There are the Maura brothers, of course, who wrote of their hunt and provided a collection of photographs of their dead bears, including the two grizzlies, on the North Coast Adventures website.³⁰ Of particular interest is a copy of Mauro's Safari Club International Method 15 Entry Form, used to apply for and enter his trophy in the SCl record book, and to order an SCl Medallion Award walnut plaque. The official measurer was John Lind,³¹ who works for the North Dakota



Grizzly bear cubs in the in the Atlin Taku region of northwestern B.C. PHOTO TRENT ALVEY/PROVINCE OF B.C.

taxidermist to whom the two grizzly bears and three black bears were sent, and the date on the form was July 24, 2008, five weeks after the Mauro brothers received their CITES export permits. There are also two photos of the dry-mounted skull of the old grizzly, though it is unclear whether those images were taken in North Dakota or Spain. The CITES Trade Database indicates that the Mauro brothers applied for and received re-export permits for the black bear trophies to be imported into the EU, and there are three dark bear hides on the wall of La Casona de Cosgaya,³² a hunting-themed boutique hotel of which Gabriel Perez Maura Garcia is "*administrador*", according to his Facebook page.³³ It is unclear whether they received re-export permits for their grizzly bear trophies, and is unknown whether they were ever imported.

Likewise, Frenchman Claude Mollard posted on Facebook pictures of a grizzly bear he killed in spring 2006.³⁴ There are several photos of the bear in the field, as well as one of the "tanned hide" (with head and claws attached) that was listed on his export permit, dated July 6, 2006. All these photos were posted on April 2, 2009, three years after the bear was killed, so it's possible that the photo of the tanned hide was taken in France, rather than B.C. Interestingly enough, there is a second export permit issued on the same day as Mollard's for another grizzly bear "tanned hide" being sent by the same permittee, Gerald Thompson, to the same French address, an adventure travel company called Effix et Decouverte in Saint-Jeuiry that offers hunting and fishing trips in Canada.³⁵ The only difference is the consignee's name, Albert Fillon, who may have hunted with Mollard in B.C. at the same time. Whether their trophies were actually exported to France is unknown. On the Northwest Big Game Outfitters website, Machiel Dubbelink is shown sitting proudly behind the B.C. grizzly sow he shot in 2013, her bottom jaw stained dark red.

CITES administrators in the EU member states keep their own records of import permits issued or denied, as well as trophies confiscated. Emails were sent to CITES offices in all the countries for which export permits were issued: Austria, Belgium, Bulgaria, Czech Republic, Denmark, Finland, France, Germany, Hungary, Lithuania, Netherlands, Romania, Slovakia, Spain, Sweden and the United Kingdom. Staff from five countries (Austria, Denmark, Germany, Spain and U.K.) responded to my query, and all acknowledged that they were aware of the 2004 import ban.

Daniela Hoffman, from the CITES Management Authority for Austria, claimed not to have allowed the import of any grizzly bear hunting trophies from B.C. between 2004 and 2014, although 17 grizzly bear trophies from Canada were imported between 2004 and 2014, and one trophy was denied entry because it was from B.C.³⁶ The CITES Trade Database indicates 26 grizzly trophy items (claws, bones, skins, skulls and trophies) were imported from Canada during this period. Ten of these items are identified by their descriptions and/or purpose codes as hunting trophies, but the records sent to me by the Canadian CITES Management Authority account for only 14 trophy items (two boiled skulls from B.C., and four claws, four skulls and four hides from Yukon). As a result, it is impossible to confirm whether anyone tried to import into Austria grizzly bear parts from B.C. without comparing export and import permits.

Mercedes Nuñez Román, national coordinator for the Subdirectorato General for Inspection, Certification and Technical Assistance of Foreign Trade, in the Spanish Ministry of Commerce, wrote, “we analyze the export permit issued by Canada in order to check that the province or region of origin is not British Columbia.” She stated that four grizzly bear “specimens” were imported into Spain from Canada between 2004 and 2014 — one “trophy” in 2006, one “skin” in 2007, one “trophy” in 2009, and one “skull” in 2010 — but, citing privacy laws, she refused to share copies of the import permits.

A quick search of the CITES Trade Database indicates that the number of imports is actually five between 2004 and 2014, and one in 2015:

1. One skull imported for a scientific purpose in 2005, for which there is no corresponding export entry in the trade database, nor an export permit on file, though it may be a skull exported the same year for a “personal” purpose;
2. One “hunting trophy” imported in 2006, for which there is no corresponding export entry in the trade database, though there are four potentially corresponding export permits from 2006, none of which seem to be logged in the database: one for a “salt dried hide” and “skull, boiled and bleached,” one for a “FULL HEAD RUG INCLUDING CLAWS”, one for a “dried skin”, and one for two “complete salted hides” and two “boiled & bleached skulls,” all of which originated in B.C. and were being exported for “personal” reasons. It is difficult to conclude which, if any, of these might be the hunting trophy that was actually imported, but the records suggest it’s worth investigating;
3. One skin imported in 2007, which has a corresponding export entry in the trade database and a corresponding export permit, for a grizzly bear killed by a hunter in Nunavut (even though it is marked “P” for personal, rather than “H” for hunting trophy);
4. One hunting trophy imported for a “personal” purpose in 2009, which may have a corresponding export entry in the trade database, and a potentially matching export permit for Bernie’s Taxidermy in Vernon, B.C., for the exportation of a “TANNED HIDE COMPLETE WITH HEAD AND FEET” and a “BLEACHED SKULL”, from a grizzly that presumably originated in B.C.^d;
5. One skull imported in 2010 for a “personal” purpose, for which there is a corresponding export record and permit, indicating the skull likely originated in B.C.
6. Last, one hunting trophy imported in 2015, but listed on the corresponding 2014 export permit as a “skin” and a “skull” from Yukon.

d Interestingly, one of the 2006 export permits that may correspond to a 2006 import of a Canadian grizzly trophy is also from Bernie’s Taxidermy, which is run by Bernie Jaeger, who also happens to be an avid hunter, taxidermist and big game guide outfitter. Both the 2006 permit and the 2009 permit were for hide-and-skull combinations being sent to Madrid addresses.

In all, it's possible that two of these imported hunting trophies (one in 2006 and one in 2009) were from British Columbia, though further research would be necessary to confirm this.

What is missing from this list, of course, is the fate of the two grizzly bear hunting trophies exported to the U.S. by the Maura brothers in 2008, one of which was an extremely large, record-breaking trophy. These trophies were exported from B.C. to a North Dakota taxidermist in 2008. Did the Maura brothers send them to Spain? The CITES Trade Database does have a record for two grizzly bears that originated in Canada being exported from the U.S. to Spain in 2010. The record indicates they were to be exported for "commercial" purposes, just as the Maura brothers did from Canada in 2008. However, there are no corresponding imports into Spain for grizzly bear trophies being transported for "commercial" purposes that year, or for grizzly bears that originated in Canada. There are, however, 12 records for grizzly bear "hunting trophies" being imported from the U.S. in 2010. A quick check of the CITES Trade Database for the fate of the Maura brother's three black bear trophies indicates the same pattern: they exported them from Canada to the U.S., and then from the U.S. to Spain, for "commercial" purposes, but imported them into Spain as "hunting trophies" (which is legal for black bears but not for grizzlies). The U.S. Fish and Wildlife Service, which manages CITES import and export permits, only keeps copies of these permits for five years, so they no longer have records. The question remains: Did the Maura brothers ever transport their grizzly trophies to Spain?

Citing privacy laws, U.K. officials were unwilling to send me copies of import permits and sent me to the CITES Trade Database for the number of Canadian grizzly bear trophies that had been imported: two, one "skin" and one "trophy", both of which were imported as "personal" items in 2008. There is no corresponding record of a "trophy" being exported from Canada in 2008, though it's possible it was a grizzly bear that originated in Yukon, NWT or Nunavut. The only corresponding "skin" listed in the trade database as having been issued an export permit in 2008 was marked as a "hunting trophy" rather than a "personal" item. The corresponding export permit lists it as a "TANNED HIDE W/ CLAWS ATTACHED" from B.C. going to Anthony Foster in Merseyside, England, sometime between February 6 and August 6, 2008. Either they are different specimens entirely, or the "skin" in question was exported as a "hunting trophy" and imported as a "personal" item.^e Only a peek at the import permit itself can resolve the mystery, but if it is the same specimen, it was likely imported unlawfully.

There also are five other export permits for B.C. grizzly "hunting trophies" destined for England between 2007 and 2013. Two of them are the same permits with slightly different issue dates. Assuming this is simply a clerical error, four people intended to ship grizzly bear hunting trophies to England well after the EU ban was initiated. Whether they were ever shipped is unknown.

Officials from Germany, Denmark and the Netherlands were more helpful in providing information on importation of Canadian grizzly bears into their respective countries. German officials provided the number of grizzly bears imported from Canada, as well as the number of import permits that were denied and the number of trophies that were confiscated.³⁷

There are 20 records in the CITES Trade Database for Canadian grizzly bear body parts imported into Germany between 2004 and 2014, as well as one import record that was acknowledged by German CITES Management Authority officials when they sent a summary of their internal records,

^e This is an excellent illustration of how the CITES Trade Database fails to provide useful information for the purpose of tracking potentially unlawful wildlife trafficking between B.C. and the EU.



Grizzly habitat at the Taku River, Northwestern B.C. PHOTO TAKU RIVER TLINGIT FIRST NATION/PROVINCE OF B.C.

but is not listed in the trade database, for a total of 21. Twelve of these records are identified in either the description or the purpose of transaction as “hunting trophies”. Seven (58 per cent) of these are hunting trophies from Yukon that received Canadian export permits. One (eight per cent), imported in 2013, is from Alberta, where grizzly bear hunting was suspended in 2006. Three import records have no corresponding export records or export permits from the Canadian CITES Management Authority. Another doesn’t have an import or export record in the trade database, nor does it appear to have an export permit on record.

The absence of these records makes it impossible to determine whether these grizzlies originated in B.C. It’s possible that the German Management Authority has copies of these permits, as they would have been necessary to grant import permits. The other nine records are for bones and skulls and skins being imported for personal, commercial or educational reasons, though it is possible that some of them may have been hunting trophies from B.C.

According to Mario Sterz, of the German CITES Management Authority, not included in these numbers were applications for four import permits (for a total of two trophies, two skulls and one skin) that were rejected, because “the trophies in question originated from the population of British Columbia.” During the same period, German customs officials confiscated five Canadian grizzly trophies because they were not accompanied by the required permits. Sterz also wrote that “several hunters didn’t apply for import permits” after they were informed about the import ban for grizzly trophies

A quick check of the CITES Trade Database for the fate of the Maura brother’s three black bear trophies indicates the same pattern: they exported them from Canada to the U.S., and then from the U.S. to Spain, for “commercial” purposes, but imported them into Spain as “hunting trophies” (which is legal for black bears but not for grizzlies).

from British Columbia.³⁸ Whether they smuggled their trophies into the country without a permit is unknown.

Denmark provided the most complete information, including copies of all import permits that were issued for Canadian grizzlies. According to the CITES Trade Database, there are seven records for grizzly bear parts imported into Denmark from Canada between 2004 and 2015. Six of these imports were for “hunting trophies” and one was a “skin” imported for “personal” purposes. Six of these imports were grizzly bears from Yukon, and one was a grizzly bear trophy from B.C., for which an exemption was granted because the hunter killed the bear shortly before the EU ban was put in place in mid-January 2004. (Neither the B.C. nor federal government has an export permit for this bear; it was provided by the Danish authorities, along with the import permits.) Burntwood Taxidermy in Prince George, B.C., received an export permit in 2007 for a B.C. grizzly bear “hunting trophy” headed to Humlebaek, Denmark. There is no import record in the trade database because the rug and skull were seized at the border by Danish authorities. There is one missing piece of the puzzle, however: A B.C. grizzly bear trophy that received an export permit in 2011 for Idstrup, Denmark, through Ron’s Wildlife Service, a Richmond, B.C., business that specializes in expediting the shipment of big game trophies to hunters. There is no official record of what happened to this shipment; it was either never transported or it was smuggled into the country illicitly.

Despite several Dutch hunters killing B.C. grizzlies, no imports into the Netherlands have been confirmed by the Dutch CITES Management Authority. According to the CITES Trade Database, there are seven export records for Canadian grizzly bear parts destined for the Netherlands between 2004 and 2015. Six of these were for “hunting trophies” (three skulls, one skin, one trophy, and one body), while one skull was being exported for “personal” reasons. There were no corresponding import records. All seven of the export records from the CITES Trade Database have corresponding export permits, including three different B.C. grizzly bears killed by Dutch hunters, one in 2006, one in 2012, and one in 2014. According to Shakira Oranje of the Netherlands Ministry of Economic Affairs and Climate Policy, there is no record of any applications to import these specimens into the Netherlands. As for Machiel Dubbelink’s hunting trophy, which was exported to the U.S. to be taxidermied and was subsequently issued an export permit for the Netherlands, it was denied an import permit because EU regulations “prohibited the introduction into the European Union of specimens of brown bear coming from populations from British Columbia.” The fate of Dubbelink’s trophy is unknown, but Oranje was concerned enough to pledge to look further into the matter.

Mario Sterz, of the German CITES Management Authority, wrote that “several hunters didn’t apply for import permits” after they were informed about the import ban for grizzly trophies from British Columbia. Whether they smuggled their trophies into the country without a permit is unknown.

CONCLUSIONS



Grizzly bear at
Bute Inlet, B.C.

PHOTO COURTESY
STAFFAN LINDGREN/
FLICKR COMMONS

DURING TWO YEARS OF RESEARCH, certain uncomfortable truths have come to light about the European Union's ban on importation of grizzly bear hunting trophies from British Columbia.

1. A significant number of EU hunters killed grizzly bears in B.C. with the intent of taking their trophies home after the ban was enacted in 2004.

Between 2004 and 2015, at least 25, and as many as 36, hunters from the EU applied for and received export permits to repatriate their hunting trophies into the EU. Records from Germany and Denmark indicate that several individuals attempted, unsuccessfully, to import grizzly bear hunting trophies into EU member states. An additional 55 export permits were issued for Norway and Switzerland, non-EU countries that could be used to smuggle B.C. grizzly trophies across the border into EU countries.

2. Although the CITES permitting system is the only method for the public to track the trade in hunting trophies, it is not a particularly useful tool for enforcing the EU ban on grizzly bear hunting trophies.

Technically, it wasn't designed to track and quantify the trade in wildlife at the subnational level. Countries are only obligated to voluntarily report biennially the amount of trade (exports and imports) between other countries, and not by province or state. The CITES Trade Database, which contains data reported by countries that

are party to the Convention, only provides quantities of body parts (skins, skulls, claws, bones, trophies) that were imported or exported for a variety of specific reasons (including, but not limited to, commercial, personal, educational and hunting trophy). Without additional information, it is impossible to identify the local origin of any particular specimen through the database, and it is exceedingly difficult to match an exported specimen with its corresponding import.

CITES export and import permits provide more detailed information, as long as the relevant information isn't redacted during the Freedom of Information process. But even these forms weren't designed to enforce the EU's wildlife management and trade regulations. For instance, it is possible for a CITES export permit to be issued for a hunter-killed B.C. grizzly without the permit providing accurate information about the fact the bear was killed in B.C. by a hunter. Unfortunately, the CITES permitting system is the only source of data for understanding how many EU hunters have killed B.C. grizzly bears since the EU ban was instituted in January, 2004.

3. The inherent inadequacies of the CITES permitting system are only part of the problem. The other major issue is the apparent disorganization and ineffectiveness of the Canadian CITES Management Authority's ability to adequately administer the permitting system in Canada.

Hunters can apply for export permits either through the B.C. Ministry of Forests, Lands, Natural Resource Operations and Rural Development or through the federal CITES Management Authority's office directly. Ultimately, the federal CITES Management Authority is responsible for administration of the CITES permitting system in Canada, and allows B.C. to issue permits on its behalf. It is clear that both the issuance of export permits and management of historical records have been inadequate. For example, Canada's CITES Management Authority is missing more than half of the export permits issued for grizzly bear body parts originating in B.C., and it is unknown how many records might be missing from B.C. and the federal government's databases. According to Lise Jubinville, head of Canada's CITES Permit Policy and Operations Unit, the accuracy of the records that are available, especially pre-2012, is unreliable; before this time, CITES management personnel used whatever descriptions and codes applicants wanted rather than what most accurately reflected the description of the specimen(s) and the reason they were being transported.

The Canadian CITES Management Authority also uses definitions of terms differently than its EU counterparts, and reports its data to CITES in a manner that is less helpful. While most EU countries list grizzly bears killed by hunters as "trophies" (which usually comprises a skull and hide), Canadian officials forgo the term "trophy" and describe each specimen separately. This makes it difficult to understand whether specimens are parts from a bear recently killed by a hunter, or whether the parts originated for another reason. The fact that Canada only reports the number of export permits issued rather than the more consequential information of how many (and which) permits were actually used, which CITES recommends, is also problematic. Jubinville maintains that things have improved since 2012, and specific information on whether

Canadian officials forgo the term "trophy" and describe each specimen separately. This makes it difficult to understand whether specimens are parts from a bear recently killed by a hunter, or whether the parts originated for another reason.



**Grizzlies at
Glendale Cove, B.C.**

PHOTO COURTESY RAY
MORRIS/Flickr Commons

a grizzly bear was killed in B.C. is being included on permits for EU member states. But this hasn't stopped EU hunters from attempting to import their grizzly bear trophies into the EU. For example, in 2013, a permit clerk in the B.C. government issued an export permit for a B.C. grizzly bear killed by Dutch hunter Machiel Dubbelink. The export permit was for transport to a taxidermist in Cody, Wyoming, which stated, "EXPORT IS FOR PROCESSING TROPHY. TROPHY WILL BE RE-EXPORTED TO HUNTER UPON COMPLETION OF TAXIDERMY. GRIZZLY BEAR IS A HUNTING TROPHY." This trophy received a re-export permit from the U.S. Fish and Wildlife Service for delivery to Dubbelink, who lives and works in the Netherlands.

Staff at the B.C. office, where most permits are issued, appear to have been less than rigorous in ensuring that the information on CITES permits was accurate, reliable and easy to understand, for the purposes of maintaining the integrity of the CITES Trade Database, and so that customs officials in EU member states could use these permits to enforce their laws and regulations. There is also no evidence that the B.C. government made EU hunters aware that it would be unlawful to return home with their grizzly trophies, and most of the export permits were issued by the B.C. office rather than the main office in Ottawa. On the other hand, the federal government has a webpage that alerts hunters to the fact that "other member countries of [CITES] may have established their own restrictions on the import of the Polar Bear. Information on import restrictions imposed by other countries can be obtained by contacting the Management Authority of the importing country."³⁹ A more formal investigation would likely be able to determine whether these oversights and errors were intentional (i.e., an attempt to facilitate transport of B.C. grizzly bear trophies into the EU), or simply a lack of understanding about how the permits should be filled out.

4. **In many cases, it was B.C. guide outfitters and/or taxidermists, some of whom were also compulsory inspectors on contract to the B.C. government, who applied for export permits on behalf of their clients for grizzly bear hunting trophies bound for the EU.**

For instance, in 2010, Basil Szoo received an export permit for two “skins” and two “skulls” that were being sent to Romania for a “personal” purpose. Szoo owns and runs Peace Taxidermy near Fort St. John, B.C., and was also a contract compulsory inspector for the Peace Region.⁴⁰ If the two “skins and skulls” he intended to send to Babos Szolt in Romania were killed by a hunter, and they were, in fact, imported, a compulsory inspector would have facilitated the unlawful importation of a hunting trophy into the EU. Likewise, Faith Kidston of Rocky Mountain Taxidermy, applied for and received an export permit for one “LIFESIZE SALTED & DRIED [GRIZZLY] HIDE W/HEAD AND PAWS” and one “CLEANED, BOILED & BLEACHED [GRIZZLY] SKULL”. The purpose of the transaction was the transportation of a “hunting trophy” to Vinderhout, Belgium. Rocky Mountain Taxidermy is owned by Peter Bruhs, who, like Szoo, is a contract compulsory inspector for the B.C. government. The export permit indicates without a doubt that the specimens in question were hunting trophies, in which case, a compulsory inspector would have facilitated the unlawful importation of a hunting trophy into the EU. Rocky Mountain Taxidermy was also involved in a similar case involving the export of a “LIFE SIZE MOUNT” and a “CLEANED & BLEACHED SKULL” that is listed as a grizzly bear “hunting trophy,” which received a permit for transport to Great Britain. Although it doesn’t appear that such actions are unlawful, there are certain ethical questions that immediately come to mind if a contract employee of the B.C. government is actively assisting someone to unlawfully import wildlife parts into the EU.

5. **Given the fragmented and incomplete nature of the information available, it is difficult to conclude the fate of any particular grizzly bear hunting trophy that was destined to be imported into the EU.**

What we do know for certain is that at least 25, and as many as 36, EU hunters applied for export permits, and that the application for and issuance of said permits are evidence of intent to import these hunting trophies into the EU. How many were actually imported into the EU is unknown, but there is plenty of evidence that EU hunters did attempt to take their B.C. grizzly trophies home. The German and Danish governments reported that several grizzly trophies from B.C. have been confiscated at customs because they lacked the appropriate paperwork, or they were denied import permits before they ever left Canada (or a second country like the U.S.). Data from the (admittedly difficult to understand and only moderately useful) CITES Trade Database indicates large numbers of grizzly bear parts are being imported from Canada into the EU, and it is possible that some, even many, of them, are being smuggled into the EU, and therefore are not registering in any of the CITES import records.

What we do know for certain is that at least 25, and as many as 36, EU hunters applied for export permits, and that the application for and issuance of said permits are evidence of intent to import these hunting trophies into the EU. How many were actually imported into the EU is unknown, but there is plenty of evidence that EU hunters did attempt to take their B.C. grizzly trophies home.

According to TRAFFIC, because day-to-day implementation and enforcement of the EU's wildlife regulations falls under the responsibility of individual EU member states, there are large discrepancies between states with regard to the capacities, resources and legal frameworks available to enforce them.

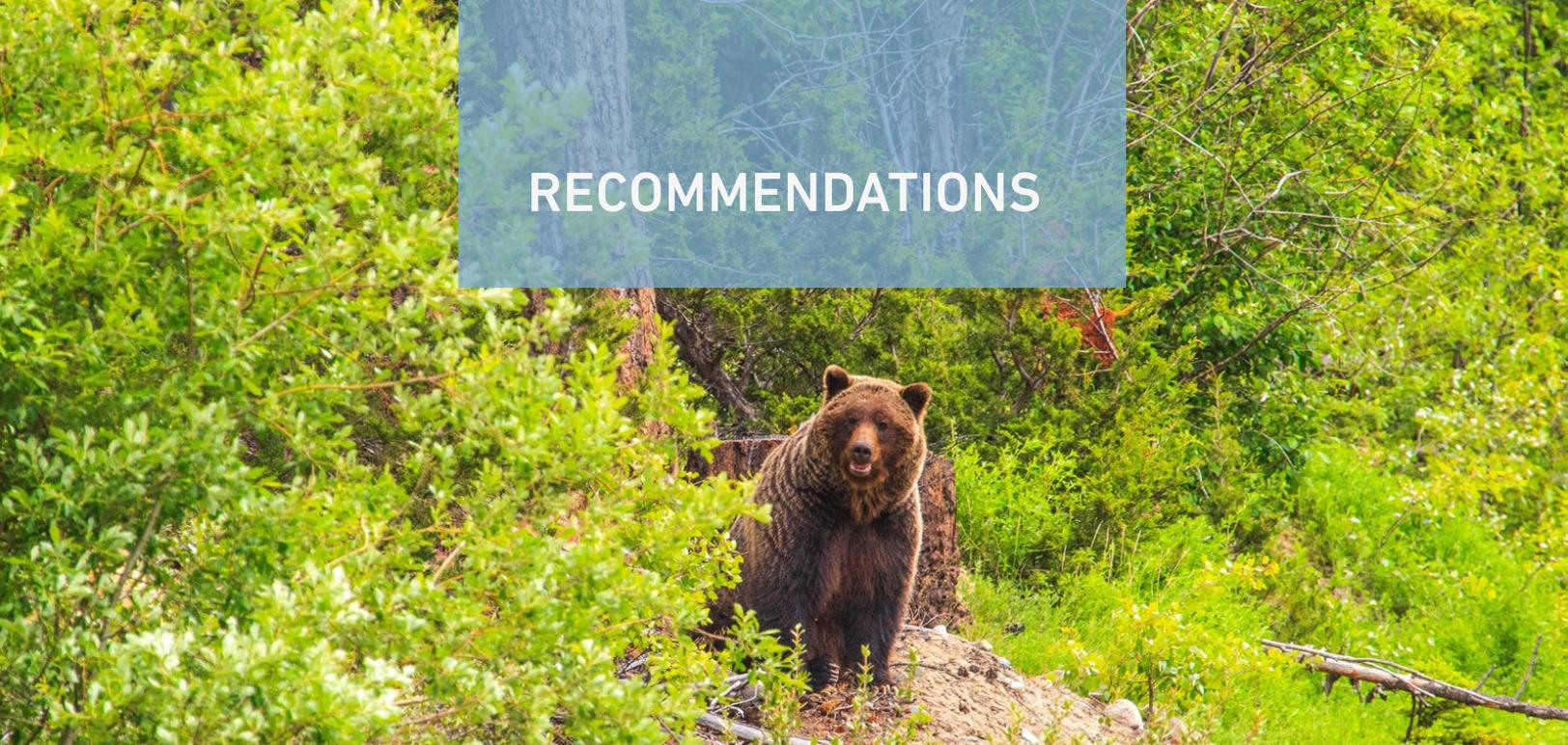


European Union headquarters in Brussels.

PHOTO COURTESY WIKTOR DABKOWSKI/FLICHR COMMONS

According to a recent briefing paper from TRAFFIC, the leading non-governmental organization working globally on trade in wild animals and plants, this should not come as a surprise.⁴¹ The EU is one of the largest markets for the global trade in wildlife and plants, and though it is difficult to quantify the illegal wildlife trade, the number of seizures in the EU each year—which average 2,500—indicates the problem is a significant one. According to TRAFFIC, because day-to-day implementation and enforcement of the EU's wildlife regulations falls under the responsibility of individual EU member states, there are large discrepancies between states with regard to the capacities, resources and legal frameworks available to enforce them. There is also a lack of intra- and international coordination and cooperation. Enforcement is the responsibility of different authorities in each member state (e.g., customs, police and inspection services), and often these authorities have no formal mechanism to co-ordinate their activities or exchange intelligence on illegal wildlife trade. This lack of cooperation at the national and EU level has remained one of the main challenges across the EU. To address these shortcomings, the European Commission (which is the executive body of the European Union) adopted in 2007 the EU Enforcement Action Plan with the aim of strengthening the enforcement of EU wildlife trade rules in EU member states. The action plan includes recommendations on adopting national action plans for enforcement, imposing sufficiently high penalties for wildlife trade offences and co-ordinating enforcement among all relevant national authorities (e.g., via the establishment of inter-agency committees). However, these recommendations are not legally binding, and they have been implemented unevenly across the EU. According to TRAFFIC, the EU's efforts against wildlife crime can only be successful when there is genuine and willing cross-sectorial co-operation between all relevant areas of government (environment, interior, foreign aid, etc.), at the EU and national levels. TRAFFIC recommends that, among other things, the EU should enhance its approach to wildlife trafficking by developing an EU Strategy and Action Plan similar to those that exist for drugs and human trafficking. A more rigorous analysis conducted with the cooperation of the B.C. and Canadian governments, and the governments of EU member states, would likely reveal that some B.C. grizzly bear trophies were unlawfully imported into the EU.

RECOMMENDATIONS



**Grizzly near Bella
Coola, B.C.**

PHOTO COURTESY
MURRAY FOUBISTER/FLICKR

THE B.C. GOVERNMENT'S 2017 BAN on grizzly bear trophy hunting has ended the ability of non-resident hunters, including those from the EU, to kill B.C. grizzly bears and take their hunting trophies home with them. But the recent hunting ban is not permanent, and a change in government may see the hunt reinstated, as happened in 2001. For this reason, it is important to investigate whether hunting and importation of B.C. grizzly bears by residents of the European Union did occur, despite the fact that the EU has banned importation of such trophies.

Given evidence that grizzly bears may have been trafficked from British Columbia to the European Union in contravention of EU wildlife regulations, the David Suzuki Foundation recommends:

1. That Canadian and EU CITES Management Authorities conduct a thorough investigation into the unlawful importation of B.C. grizzly bears into the EU.
2. That, should the hunt be reinstated, the B.C. government ceases issuing CITES export permits for grizzly bear trophies destined for EU countries.⁴²
3. That both Canada and B.C.'s non-detrimental findings reports should be independently reviewed by a panel of grizzly bear experts to determine if the export of grizzlies from B.C./Canada has put the species at risk. If the independent review concludes that the non-detrimental findings are flawed, Environment Canada and MFLNORD should cease issuing CITES export permits for grizzly bear hunting trophies.
4. That Canada/B.C. should regularly release information on the number of CITES export permits issued for other wildlife species that are killed by foreign trophy hunters in B.C., such as black bears. Improved transparency is necessary to facilitate independent analysis of the trade and trafficking of wildlife species from B.C.

Sources

- 1 <http://www.ncasafaris.com/bc-guided-grizzly-bear-hunt.html>, accessed April 8, 2018.
- 2 Ibid.
- 3 Committee on the Status of Endangered Wildlife in Canada. 2012. COSEWIC assessment and status report on the Grizzly Bear *Ursus arctos* in Canada.
- 4 David Suzuki Foundation. 2017. "B.C.'s grizzlies and human-caused mortality in 2016." <https://davidsuzuki.org/wp-content/uploads/2017/09/bc-grizzlies-human-caused-mortality-2016.pdf>, accessed April 8, 2018.
- 5 Ibid.
- 6 B.C. Ministry of Environment. 2010. "Grizzly Bear Hunting: Frequently Asked Questions." http://www.env.gov.bc.ca/fw/wildlife/management-issues/docs/grizzly_bear_faq.pdf, accessed April 8, 2018.
- 7 Supra note 4.
- 8 http://www.env.gov.bc.ca/fw/wildlife/hunting/non_resident/#hunting, accessed July 20, 2017.
- 9 Fish and Wildlife Branch, Ministry of Environment, British Columbia. Updated July 2010. "Guide Outfitters in British Columbia: 2010-2011."
- 10 Government of Canada. Published July 5, 2012, updated February 17, 2014. "Grizzly bear: non-detriment finding." <http://www.ec.gc.ca/cites/default.asp?lang=En&n=2942DC30-1>, accessed April 8, 2018.
- 11 Ibid. <http://www.ec.gc.ca/cites/default.asp?lang=En&n=13B813Ff-1>; Austin, Matt and David Fraser. Non-Detriment Report under the Convention on International Trade in Endangered Species of Wild Fauna and Flora Regarding the Export of Grizzly Bears (*Ursus arctos*) from British Columbia, Canada. September 2004.
- 12 <http://www.frontcounterbc.gov.bc.ca/apps/app33.html>, accessed April 8, 2018.
- 13 Caroline Caceres and David Fraser. The NDF Process for *Ursus Arctos Horribilis* (Grizzly Bear) in Canada. 2008. https://cites.org/sites/default/files/ndf_material/WG5-CS3.pdf
- 14 European Union and TRAFFIC. 2015. Reference Guide to the European Union Wildlife Trade Regulations. Brussels, Belgium.
- 15 Knapp, A. 2006. *Bear Necessities: An Analysis of Brown Bear Management and Trade in Selected Range States and the European Union's Role in the Trophy Trade*. A TRAFFIC report for the European Commission, Brussels, Belgium.
- 16 Knapp, A. *Bear Necessities*. Supra note 15.
- 17 Peek, J. et al. 2003. *Management of Grizzly Bears in British Columbia: A Review by an Independent Scientific Panel*. http://www.env.gov.bc.ca/wld/documents/gbear_finalspr.pdf.
- 18 Knapp, A. *Bear Necessities*. Supra note 15.
- 19 Knapp, A. *Bear Necessities*. Supra note 15.
- 20 Artelle, K. 2013. "Confronting Uncertainty in Wildlife Management: Performance of Grizzly Bear Management." *PLoS One* (8)11.
- 21 Office of the Auditor General of British Columbia. October 24, 2017. "Ministries' management of grizzly bears did not meet expectations" [press release]. http://www.bcauditor.com/sites/default/files/publications/news-releases/MEDIA_Grizzly_Bear_Mgmt_NR_FINAL.pdf.
- 22 Office of the Auditor General of British Columbia. 2017. *An Independent Audit of Grizzly Bear Management*. Victoria, British Columbia.
- 23 Commission Implementing Regulation (EU) 2017/1915 of 19 October 2017. Official Journal of the European Union. <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017R1915&from=EN> on April 8, 2018.
- 24 CITES Trade Database, retrieved on March 21, 2017.

- 25 CITES. "Guidelines for the preparation and submission of CITES annual reports." June 2010.
- 26 Lise Jubinville, personal communication, email, March 31, 2017.
- 27 Ibid.
- 28 Ibid.
- 29 Nurie Aliperti, personal communication, comment in Word document, May 1, 2018.
- 30 Supra note 25.
- 31 Retrieved from http://www.dakotataxidermy.com/?page_id=12 on September 24, 2017.
- 32 Retrieved from <https://www.youtube.com/watch?v=gqKSEkVN1tY> on April 5, 2018.
- 33 Retrieved from <https://www.facebook.com/gabriel.perezmauragarcia> on April 5, 2018.
- 34 Retrieved from https://www.facebook.com/claude.mollard.52/media_set?set=a.1024486224101.3739.1583637912&type=3&pnref=story on April 5, 2018.
- 35 Retrieved from <http://www.effixetdecouverte.com/activite.php> on April 3, 2018.
- 36 Personal communication, email, April 3, 2018.
- 37 Personal communication, email, May 12, 2016.
- 38 Personal communication, email, May 10, 2016.
- 39 Retrieved from <https://www.canada.ca/en/environment-climate-change/services/convention-international-trade-endangered-species/non-detriment-findings/polar-bear-export-information-note.html> on April 8, 2018.
- 40 Retrieved from <http://www2.gov.bc.ca/gov/content/sports-culture/recreation/fishing-hunting/hunting/compulsory-inspection> on April 8, 2018.
- 41 TRAFFIC. March 2014. *Wildlife Trade in the European Union*.
- 42 Retrieved from <http://www2.gov.bc.ca/gov/content/sports-culture/recreation/fishing-hunting/hunting/compulsory-inspection> on April 8, 2018.



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