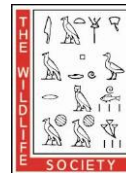




The Wildlife Society
Manitoba Chapter



Dr. James Duncan
Wildlife and Fisheries Branch
Department of Sustainable Development
Box 24, 200 Saulteaux Crescent,
Winnipeg, MB. R3J 3W3

July 4, 2018

Dear Dr. James Duncan,

The Wildlife Society's Manitoba Chapter is Manitoba's oldest scientific based wildlife management organization representing approximately 150 wildlife professionals including scientists, professors, managers, biologists, veterinarians, educators and planners. As an organization committed to scientific based wildlife management we are writing to inquire about a recent permit issued by your Branch to the Manitoba Black Bear Rescue (<http://manitobabearrehabilitationcentre.ca>) in the RM of Rockwell that allows for the rehabilitation and release of black bear cubs in Manitoba. It is our understanding that this spring a number of orphan cubs have been received by the Centre and we are interested to understand the regulations, permit conditions and guidelines surrounding this process. We understand that highly publicized events in recent years have shown that there is a public demand for this type of program. As outlined on the Wildlife and Fisheries Branch website, data from other jurisdictions suggest that although survival is generally low, rehabilitation of orphans is still a viable option for black bear cubs. However, there are significant human and wildlife health risks associated with rehabilitation and release of large carnivores and omnivores. We are particularly interested in the following aspects, and request responses to the following:

1. There is concern that interference with bear cubs left alone while the mother forages could cause human-induced abandonment. Upon receiving a report, how does Manitoba Sustainable Development and/or the rehab centre monitor and accurately identify that cubs have been abandoned?
2. What guidelines are in place to ensure appropriate levels of animal care both in day-to-day husbandry and for veterinary care?
3. What protocols are in place to avoid human habituation during the rehabilitation process? Has the proponent demonstrated that they will be encouraging the natural biological processes that bears need to master prior to release, including: natural foraging/hunting, skilled climbing, navigational skills and denning behaviour? Will there be any pre-release assessment of the level of habituation before release?
4. Is a plan in place to deal with cubs that are obtained, but cannot be released back into the wild (e.g. fail to demonstrate adequate skills needed for rehabilitation and release)?
5. Where will the rehabilitated animals be released? What is the process and criteria utilized to determine the suitability of a release site? If it is near people, will residents

- be made aware? If the animal is chemically immobilized before transport will it also be marked to alert hunters that the meat may be tainted?
6. If animals are rescued from locations across the Province but released in a different area there is a risk of disease transmission. What protections are in place to mitigate this risk?
 7. Is there a follow up or monitoring plan to track the success of the program?
 8. What is the Province's ongoing roll for inspection and monitoring the facility to ensuring compliance to the permit? What is the time period for permit review and renewal (annually, every five years, etc.).
 9. Is there a public education plan in place to inform well-meaning members of the public to contact appropriate government authorities when finding orphaned black bear cubs, and not to handle or attempt to transport them to this facility?

As a group of wildlife professionals working in the Province we are very interested in projects such as these as they have potential benefits to wild populations but they also come with significant risks. We would like to evaluate these risks and contribute to the ongoing management of wildlife in the Province.

Thank you for your time and please feel free to contact us if you have any questions.

Sincerely,



Michel Leclaire
President
The Wildlife Society, Manitoba Chapter