Is the Manitoba Spring Bear Hunt an Ecologically Responsible and Humane Practice?

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On a planet that supports millions of other species, **it is time for political decisions about wildlife policies on management, conservation, and interactions to apply ethical consideration to animal welfare** and reciprocal relationships with non-human animals and the environment.

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Executive Summary

Despite the cultural, ecological, and economic benefits of black bears in Manitoba, in addition to their inherent sentience and intrinsic value, hunters from around the world are permitted to kill them during the spring. Spring hunting, which is primarily for recreation, inevitably orphans dependent or nursing cubs who thus face suffering and death.

Unlike other "big game" species such as deer or moose, bears are among the only mammals hunted when the young still rely on their mothers for food and protection. With the exception of wolves, black bears are the only "big game" species that are not required to be used for human consumption.

Baiting "big game" species is illegal for all animals except wolves and black bears. During the spring hunt, hungry black bears newly awakened from hibernation and restricted by limited food resources are drawn into established bait stations typically loaded with meat and sugary foods, such as donuts, cookies and candies, where hunters wait for them. These stations, which are permitted just beyond 200 metres of a dwelling or 500 metres of a cottage subdivision or campground, may cause bears to be acclimated to finding human foods in close proximity to people.

In addition to moral concerns about animal welfare, intrinsic value, and sport hunting, there are strong ethical concerns about knowingly creating orphaned cubs who are vulnerable, distressed, and expected to die, year after year. Although wildlife rehabilitation

Black bear cub.

Credit: Geoffrey Kuchera, Adobe Stock

centres take in some orphaned cubs, most are not found. While data are limited and thus likely low, records indicate that in the most recent years for which data was available, at least 19% of black bears killed in Manitoba were female while an additional 15% had no information reported on their sex.

Manitoba does not have a conservation or management plan for black bears, or a reliable population estimate. Complete records of the number and demographics of black bears killed in the spring hunt are lacking. The limited data available are insufficient to ensure that the spring hunt does not lead to overexploitation of the population.

Socio-economic aspects to consider include both human and bear safety and co-existence. Specifically, studies demonstrate that hunting black bears does not result in fewer human-bear conflicts and because baiting is allowed in close proximity to human dwellings, it may actually contribute to its increase.

Finally, there is a large potential to generate greater economic revenue and more employment opportunities through non-consumptive nature use and bear-viewing opportunities compared to the hunting of bears.

In light of these important biological, sociological, ethical, and economic aspects, spring black bear hunting should not be continued in Manitoba.

1.0 Introduction

The American black bear (*Ursus americanus*) is indigenous only to North America (Hummel *et al.* 1992). The 2025 spring bear hunt season is open from April 28 to mid-to-late June depending on the region, with the fall bear hunting season running from August 15 to November 1. Black bears are hunted by residents of Manitoba and by those from outside the province and country (Manitoba Hunting Guide 2024). While there are concerns specific to each hunting season, this review will focus on the spring bear hunt only.

Black bears have inherent worth and intrinsic value (Owens *et al.* 2024; Paquet and Darimont 2015). They contribute ecological benefits (Commito 2015) including seed dispersal over vast distances, opening of the forest canopy to allow more sunlight, and cycling of soil nutrients as they break apart decomposing wood to search for insects and grubs (Block 2022). As large carnivores, bears help shape ecosystems and other trophic levels by influencing the number and behaviour of the animals they hunt (Lennox *et al.* 2018).

Black bears also have strong spiritual and cultural importance to Indigenous people in Manitoba and across North America (Lawrence 2025; Thompson 2023; Native Hope 2020; Lac du Bonnet and District Historical Society 2018; Morrisseau 1977). This is embodied by the Bear Clan, one of seven Clans among the Ojibwe peoples of the Anishinaabe. Despite this, Manitoba's current management of bears, or any wildlife, has not included traditional ecological knowledge in any meaningful way.

Further, black bears enhance wilderness experiences for residents and visitors alike, with simultaneous economic benefits to communities through wildlife watching, tourism, and photography (Honey *et al.* 2016).

Citizens across North America are increasingly concerned about the hunting of wild animals for sport and are demanding humane, socially acceptable, science-based and ecologically sound management strategies and treatment of wildlife (Artelle *et al.* 2018; Dubois *et al.* 2017; Honey *et al.* 2016; Fox and Bekoff 2011; Pacelle 1998). Government agencies and wildlife managers would be prudent to recognize and consider the interests of the species and values of non-consumptive stakeholders. If society is to move away from attitudes that have fueled the greatest extinction rates in sixty-five million years, decision-makers must align wildlife management policies with growing public expectations for humane, science-based conservation plans, or risk losing public trust and electoral support (Artelle *et al.* 2018; Dubois *et al.* 2017; Fox and Bekoff 2011; Pacelle 1998).

1.1 Black Bear Hunting Regulations

To hunt a black bear in Manitoba, a provincially issued general "big game" hunting licence and a seasonal black bear hunting licence are required. A general "big game" hunting licence costs $7.00. Fees for a black bear hunting licence for the spring season, April 1, 2024 to March 31, 2025, are shown in Table 1.

Table 1: Black bear hunting licence costs from the 2024 Manitoba Hunting Guide, p.5.

Black Bear Licence	Manitoba resident	$40.75
	Manitoba resident (youth)	$14.75
	Canadian resident	$123.25
	Non-Canadian resident	$237.25

Manitoba's 2024 Hunting Guide (p. 14) lists black bear hunting as "recreational" and states that unlike most "big game," black bear hunters are exempt from abandoning or allowing spoilage of bear flesh.

Bear licences can be used in either the spring or fall bear hunt season, with a limit of one bear per year. After obtaining the required licence and permit for minimal cost, Manitobans can hunt black bears independently, with no requirement to report the bears they kill beyond a request from the province to complete a **voluntary** "big game" hunter questionnaire. Because reporting is voluntary there is no way to reliably gauge the impacts of the hunt on the bear population.

Non-Canadian licences to hunt black bears are available only through licenced outfitters. Non-Canadian hunters are required to hunt in the company of a registered guide outfitter, with mandatory reporting of the number and sex of bears killed. Records indicate that the majority of black bears hunted in Manitoba each spring (over 70%) are killed by non-resident hunters.

No level of hunting proficiency is required to hunt black bears beyond an applicant's provision of a hunter education certificate number, or an attestation of such, with the issuing U.S. state or province and country indicated when purchasing a license.

1.1.1 Baits

Baits are used to lure bears into a location where tree stands are set up for hunters to view and shoot bears. Up to 100 kg of meat and other foods are allowed on crown land for bear baiting, and can be placed up to 14 days prior to the first day of the open season (Manitoba Hunting Guide 2024).

Foods such as donuts, breakfast cereal, cookies, candy and bread are regularly used in bait stations, acclimating bears to human foods. While the government instructs Manitobans in its **"Coexisting with Black Bears"** booklet to "Never feed a bear, whether intentionally or inadvertently" as "it's unwise and unlawful," hunters are allowed – and encouraged – to do just that.

In fact, bait stations are permitted just beyond 200 metres of a dwelling or 500 metres of a cottage subdivision or campground, acclimating bears to find food in close proximity to people (Manitoba Hunting Guide 2024).

1.2 Manitoba Spring Bear Hunt Data

1.2.1 Non-Canadian Hunters

Although records of black bears killed are incomplete, the available data suggests that the majority of black bears hunted in Manitoba each spring are killed by non-Canadian hunters (ECC FOIP No. 2425-ECC-0819; Arlt email correspondence 2019; Hristienko *et al.* 2004). Between 1996-2000, Hristienko *et al.* (2004) estimated that non-resident hunters accounted for approximately 74% of black bears killed through hunting, with more than 70% of black bears hunted by non-resident hunters killed in spring (Hristienko *et al.* 2004; ENR FOIP No. 2324-ENR-0384). Non-resident hunters must submit information about bear kills through the registered guide they employ to hunt legally.

In 2023, a total of 2,462 spring black bear hunting licences were sold (ECC FOIP No. 2425-ECC-0819). Of those 1,218 were purchased by non-Canadian residents (ECC FOIP No. 2425-ECC-0819) who reported killing 1,000 black bears in spring 2023 (ENR FOIP No. 2324-ENR-0384). An estimated 550 black bears were killed by Manitoba residents that spring.

Hummel *et al.* (1992) suggest that the high composition of non-Canadian hunters killing black bears may be a reflection of what has happened elsewhere to bears, with Canada serving as a last stand for much of North America's remaining wildlife.

1.2.2 Canadian Hunters

The number of bears being reported as killed by residents is significantly lower than the number of tags purchased. This is likely due to a low return rate on the voluntary survey which could lead to unreliable estimates. For example, 2023 records show that out of 2,053 Manitoba resident black bear licences purchased and 91 Canadian resident licences (FOIP 2425-ECC-0819), only 268 surveys were submitted (MNRI FOIP 2425NRI-0008). Assuming that all Manitobans with a black bear hunting licence participated in the spring or fall season, this amounts to a response rate of less than 13% in 2023, with the rate for the previous year just slightly higher at 13.6% (MNRI FOIP 2425NRI-0008). Thus, the actual number of bears killed by residents of Manitoba and from other Canadian provinces is unknown and the figure presented largely represents guesswork. This is problematic given that in 2023 over half of black bear licenses sold went to Manitoba residents (n = 2053) and Canadian resident (n = 91) hunters (FOIP No. 2425-ECC-0819), neither of which are required to report bear kills. Manitoba bases estimates on the number of bears killed by provincial residents using the success rate reported in voluntary hunter surveys ("Big Game Hunter Questionnaire") compared to the total number of tags sold. Spring and fall bear kills captured by submissions through voluntary hunter surveys indicate that the survey response rate is low, with over 1,300 tags not accounted for each year in 2022 and 2023, and the vast majority of kills (i.e., several hundred bears annually) not being reported, according to the provincial estimate, see Table 2 (A. Reimer, pers. comm. 2025). It follows that these data are likely low and thus estimates are unlikely to be accurate.

Adult black bear.

Credit:
Peter Nuij, Unsplash

1.2.3 Number of Female Bears Killed

Where data were provided, annual records indicate that in 2022 and 2023, at least 19% of black bears killed by non-Canadian hunters were female (ENR FOIP No. 2324-ENR-0384), while an additional 15% had no data reported on their sex (ECC FOIP No. 2425-ECC-0819). Tables 2 and 3 show the records from 2022 and 2023 of black bears hunted by non-Canadian residents and Manitoba residents, respectively. Similar statistics were found in Ontario in 2023 where 21% of kills reported were of female bears (ON Hunting Guide 2024). Again, these numbers are likely lower than the actual number of female bears killed but represent a disturbingly large number.

In 2023, 1320 bears were killed by non-resident hunters, 1000 of whom were killed during the spring hunt. Approximately 24% of those bears were females (applying the same ration of males to females to the no-sex-provided group). This means that an estimated 243 bears killed in the spring hunt were likely to be females.

Hristienko *et al.* (2004) cited studies in Pennsylvania and Ontario which estimate that, at minimum, approximately 35 to 38% of female bears have cubs. Using this estimate, approximately 89 of those 243 bears likely had cubs who were left orphaned because of the hunt. Since black bear litters range in size from one to four cubs, with the most common litter size being two, **at least 178 cubs were likely orphaned because of the spring hunt in 2023 and thereby sentenced to cruelty and completely avoidable deaths**.

Table 2: Reported black bears killed by non-Canadian hunters broken down by season and sex 2022-2023 (FOIP 2324-ENR-0384 and FOIP 2425-ECC-0819)

Year	Total Black Bears Killed by non-Canadian Hunters	No. Tags Sold (Spring and Fall)	Killed in Spring	Killed in Fall	Male	Female	No Data on Sex
2023	1320	1659	1,000	320	851	274	195
2022	826	1004	676	150	557	156	113

Table 3: Estimated number of black bears killed by resident hunters broken down by season 2022 –2024[1,2] (FOIP 2425-ECC-0819; A. Reimer pers. comm. 2025)

Year	Estimated Total Black Bears Killed by Manitoba and Canadian Residents	No. Tags Sold (Spring and Fall)	Reported No. Killed in Spring	Reported No. Killed in Fall
2024	755	No data	31	20
2023	550	2053	27	26
2022	710	2029	66	20

1 Not all 2024 surveys had been submitted when this number was provided
2 These results are estimates based on voluntary submission of hunter surveys

2.0 Arguments for Ending the Spring Hunt on Black Bears

Compared to other large wildlife species, black bears have slow reproduction rates. Female black bears generally reach sexual maturity at three to seven years of age (Hummel *et al.* 1992). Adult females usually birth cubs every two to three years, with an average litter of one to four cubs (Hummel *et al.* 1992).

The bear family, *Ursus*, of which black bears are a member, is prone to endangerment worldwide, with most species considered to be at risk. These species and their conservation status are listed below:

- Giant Panda – Endangered, Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Appendix I (Appendix I lists species that are the most endangered)
- Asian Black Bear – Vulnerable, International Union for the Conservation of Nature Red List of Threatened Species (IUCN); CITES Appendix I
- Polar Bear – Vulnerable, IUCN; climate change vulnerable
- Spectacled (Andean) Bear – Vulnerable, IUCN; CITES Appendix I
- Brown Bear (including "grizzly") – Reduced range
- Sloth Bear – Vulnerable, IUCN; CITES Appendix I; Reduced range
- Sun Bear – Vulnerable, IUCN; CITES Appendix I; Reduced range

This list should serve as a precautionary model for jurisdictions seeking to preserve biodiversity and ecosystem functions.

In Nova Scotia just last year, a proposal to begin a spring bear hunt was considered but quickly overturned following public consultation (CBC 2024; Global 2024; NSG 2024). Over 17,000 Nova Scotians responded to the survey, with the majority of participants opposed, citing concerns over bear conservation, potential safety issues, and conflict with other outdoor activities (CBC 2024; NSG 2024).

There is a growing desire within Canadians to protect the country's natural resources from U.S. exploitation. The Manitoba spring bear hunt stands as a glaring example of this profiteering with wealthy American hunters accounting for the largest percentage of hunters killing the province's black bears for trophies.

Mother black bear and cub.

Credit:
AB Photography, Adobe Stock

2.1 Animal Welfare and Environmental Concerns

Black bear cubs emerge from dens with their mothers in late April or early May weighing about 5 kg (10 lbs) (GOM 2021; Ontario Ministry of Natural Resources 2009) when they are approximately three to four months of age. Cubs are typically weaned between five to six months of age (Beecham 2006). Cubs are nursed by their mother's rich milk until fall (Beecham Aff. ¶ 4), and are dependent on her for protection against males in predatory encounters (Beecham Aff. ¶ 4). During the first 18 months of their lives, black bear cubs depend on their mothers to teach them essential life skills and survival mechanisms through knowledge transfer and shared experiences, with strong emotional bonds shared between them. Black bears are among several species in which generational teaching is important for attaining critical survival skills, and Kopf *et al.* (2024) argue for increased efforts to conserve and protect Earth's older individual animals which are in decline globally in part due to human hunting. These elder animals transfer cultural knowledge, and contribute significantly to population dynamics as well as provisioning ecosystem processes and services (Kopf *et al.* 2024).

2.1.1 Orphaned Cubs

Manitoba's hunting regulations prohibit hunters from killing cubs or females accompanied by cubs. However it is known that this occurs as lactating females who approach bait-piles are killed every year (Beecham Aff. ¶ 17; Hristienko *et al.* 2004; Beck *et al.* 1995), resulting in a slow death by starvation or predation of orphaned cubs. Thus, the spring bear hunt results in the unavoidable orphaning of cubs, who face suffering before death. According to Dr. John Beecham, a renowned wildlife biologist with over 40 years experience in the fields of bear research and management, "there is no getting around the orphaning of cubs when a spring hunt for black bears occurs" (Aff. ¶ 17).

Using a population estimate of 25,000 to 30,000 from a 2001 Status Report on black bears, Hristienko *et al.* (2004) suggest approximately 41 cubs were orphaned each spring in Manitoba by bear hunters from 1996-2000. This estimate combined data from voluntary hunter surveys and hunter submissions of molar teeth and intact reproductive tracts. This is very likely to be a significant underestimate, due to a potential sample bias: the study was limited to data obtained from hunter submissions and voluntary surveys, which may have led to an underrepresentation of lactating females killed during the spring hunt. Resident hunters may not want to report having killed a lactating female out of fear of penalties and/or loss of hunting licence. Survey response bias likely continues to persist today in most voluntary hunter surveys. In any case, a higher number of black bears were reported killed by non-resident hunters in Spring 2023 (n = 1,000) (ENR FOIP No. 2324-ENR-0384) compared to bears killed in Hristienko *et al.'s* (2004) estimates (n = 854), which suggests that a higher number of cubs are actually being orphaned annually.

Orphaned bear cubs experience prolonged levels of distress and suffer a slow, painful death from starvation, dehydration, and exposure. Cubs orphaned in the spring hunt are too young to fend for themselves, leaving them more vulnerable to being killed through predation (Beecham Aff, ¶ 10). Manitoba's spring black bear hunting season is from late April to late June. Hristienko *et al.* (2004) suggest that cubs orphaned before early May have a decreased chance of survival compared to cubs orphaned after late May. In Ontario in 1987, only 40% of cubs orphaned after May 24 survived to hibernation (Hristienko and McDonald 2007; Kolenosky and Strathearn 1987). Hummel *et al.* (1992) state that on average in Canada, only 30% of cubs orphaned in the spring survive, and Beecham asserts that "[c]ubs of nursing bears killed before July 15 will almost certainly die" (Aff. ¶ 17).

It is unlikely that hunters will be aware of cubs orphaned when their mother is killed. Even if they recognize that the female they have just killed is lactating, locating the cubs afterward is unlikely. Thus, it is only rarely that cubs orphaned through the spring hunt are retrieved and brought to rehabilitation centres.

Mother black bear and her three cubs.

Credit: Betty Sederquist, Adobe Stock

Black bear cubs in a tree.

Credit:
Brad Justice, Adobe Stock

2.1.1.1 Stashing Cubs

In the first few weeks after emerging from the winter den, cubs are small and unable to travel quickly. Nursing females can be at a great distance from their cubs while they go in search of food or secure habitat (MacGillivray 2024; Beck *et al.* 1995), or when being pursued by a threat (Beck *et al.* 1995, Beecham Aff. ¶ 4-6). Cubs are often stashed up a tree, referred to by bear biologists as a "sanctuary tree" (Beecham Aff. ¶ 5) or "nanny tree." The Government of Alberta's orphan black bear policy states: "[f]emale bears will leave their cubs for up to 15 hours at a time while searching for food" (GoA 2024). Beecham (Aff. ¶ 5) describes a state bear biologist from Colorado who showed, through radio-tracking data, that nursing female bears often travel up to two miles (approximately 3.2 kms) from their cubs. Nursing females also appear reluctant to bring their cubs to bait stations which may have male bears potentially aggressive to cubs frequently approaching them (Beecham Aff. ¶ 6). As a result, nursing female black bears will approach hunters' bait stations alone, where they are then killed (Beck *et al.* 1995; Beecham Aff. ¶ 6). Although this does not technically violate the regulation prohibiting the killing of females accompanied by cubs, the consequence is still orphaned cubs who will most likely starve to death or be killed through predation.

In Ontario in 2023, 2190 black bears were reportedly killed in the spring hunt, with 21% of kills being female bears (ON Hunting Guide 2024), which equates to 460 female bears. These females may have stashed their cubs. Again using the 35 to 38% estimate from Hristienko *et al.* (2004) of female bears who have cubs, this means that 161 to 175 females may have left behind orphaned cubs during the 2023 Ontario spring bear hunt.

2.1.1.2 Difficulties in Determining Sex of Bears

To avoid the illegal killing of lactating female bears, it has been suggested that standing bait stations allow hunters to better distinguish between sexes and identify lactating females. This is highly contested. The Manitoba Hunting Guide describes various ways to discern male and female bears, however, these can be ambiguous (Beck *et al.* 1995). There is no reliable way to tell a male from a female due to overlaps in sizes of black bears of differing ages and sexes (Beck *et al.* 1995), as well as differences in individual phenotypes and behaviours. Beecham cites a number of bear experts and states that most biologists contend it is very difficult, even for experts, to accurately distinguish the sex of a bear, let alone determine if a female is nursing (Aff. ¶ 7,9). As such, regulations prohibiting the hunting of lactating females or females with cubs are very difficult to implement in the field and are, essentially, futile (Beck *et al.* 1995; Beecham Aff. 7). Even in circumstances where a bear's sex and reproductive status is visibly discernable, hunters do not always give bears the opportunity to stand at suspended bait stations (Obbard *et al.* 2008).

Positive sex identification is often not possible because in many situations in spring the remaining winter coat is too long and thick to make reproductive status discernable. Strong shadows and angles (as from an elevated position in a hunting stand) can further exacerbate the difficulties involved in determining the sex of a bear or whether a female is lactating. An examination of available hunter kill data does not support that males are predominantly selected at bait stations; females are killed each spring, with some showing same-year placental scars or evidence of birth (Hristienko and McDonald 2007). According to *Politico*, an American political digital newspaper, despite prohibiting the shooting of females with cubs in Florida's 2015 spring hunt, an analysis of partial data from black bear kill records for 102 female bears suggested more than one quarter were lactating (Ritchie 2015).

Aside from questions around hunter proficiency and a lack of certainty around the ability to discern male versus female bears, a careful assessment of sex or the presence of cubs may be nullified by the exhilaration and adrenaline coursing through a hunter when a bear is within shooting range. This may be even more common with young and novice hunters who have less experience being in close proximity to a bear.

In 2019, to learn more about the impacts of spring hunting and identify whether hunter killed females were lactating, the Washington Fish and Wildlife Commission mandated that all hunters submit bear skins and skulls for sex identification and inspection (Flatt 2021). The state of Washington has had no spring bear hunt since 2022 (Flatt 2023).

2.1.1.3 Rehabilitation of Orphaned Cubs

There is only one facility in Manitoba for rehabilitation and eventual release of all cubs orphaned in the province. These cubs are fitted with government ear tags and radio-collars that are intended to fall off after one year to accommodate growth. The tracking program is funded by the rehabilitation facility and is expensive. The long term survival rate of cubs from the program is still unknown, partly because only short-term data are available (i.e., cubs are tracked for only one year) and also because the government has restricted the release of the data from this program. Although it varies annually, black bear cub rehabilitation is costly, and currently in Manitoba the facility is funded solely through donations. Since 2018, $43,000 to $100,000 has been spent annually to rehabilitate, release, and monitor orphaned cubs (Canada Revenue Agency, Charities Information returns T3010 for 2018-2023).

Between 2018 and May 29 2024, 96 orphaned black bear cubs were sent to the rehabilitation facility (ENR FOIP No. 2324-ENR-0384). Although it is impossible to ascertain how many of these cubs were orphaned as a result of the spring hunt since the government does not share that information when it is available, it is reasonable to assume that some were.

When orphaned cubs *are* found in Manitoba, restrictive criteria limit those brought in for rehabilitation; only orphaned cubs found before August 1 or under 30 lbs. are eligible for acceptance (GOM 2021). Cubs requiring long-term veterinary care, including those suffering from severe starvation, are not accepted for rehabilitation (GOM 2021). During 2022 and 2023, six orphaned cubs who were located did not meet the criteria for rehabilitation and were released to try to survive on their own (ENR FOIP No. 2324-ENR-0384).

2.1.2 Additional Concerns

There are suggestions that bait stations maintained by outfitters can result in most of the bears attending a bait station being killed, regardless of sex (Beck *et al.* 1995). In addition to the questionable ethics surrounding the use of bait and the increased vulnerability of bears to hunters, as well as the concept of "fair chase," the practice of bear baiting (Figure 1) raises concerns about the potential for disease transmission and public safety. Predators may defend the food resource, or become food-conditioned bears, and strife may occur among those who dislike the sight or smell of baits (Beck *et al.* 1995). Baiting can also lead to an increased level of conflict among bears as they congregate around the bait. It may also increase wildlife management costs associated with the monitoring and enforcement of baiting requirements (Beck *et al.*1995). The allowable baiting of bears may increase public disdain of hunting in general, and cast negative light upon management agencies who condone methods that contrast with views that the humane treatment of wildlife is a primary principle.

Figure 1:
These photos demonstrate that bears lured to bait stations do not provide "fair chase," and that multiple bears may approach the station which can contribute to conflict among bears.

Credit:
Manitoba black bear hunt outfitter, "Hunts from the Heart."

In the case of ungulates, a spring hunting season is not allowed. This is partly due to the diminished fitness levels and increased vulnerability of ungulates after winter. During the spring, bears are under physiological stress as they awaken from hibernation with depleted nutrient and fat stores. During this time bears are more vulnerable and food resources are limited, and thus they are more likely to attend baits.

Except for bears and wolves, it is illegal to bait "big game" animals (deer, elk, moose, caribou) and there is a legal requirement that all edible portions of "big game" animals be used, except wolves and bears. It is unclear why ethical considerations used to determine ungulate hunting regulations are not applied to all species, including black bears (Beck *et al.* 1995).

2.2 Behaviour and Biology

The dynamics of bear populations are most sensitive to the mortality rates of adult females (Commito 2015; OMNR 2009; Hummel *et al.* 1992). Therefore, any loss of adult females to the population will have a disproportionately negative environmental consequence.

The Manitoba Wildlife Federation has stated that Manitoba lacks a reliable population estimate of black bears, with no empirical evidence for current population estimates (Sexton 2021). The current black bear population in Manitoba is estimated to be approximately 30,000, determined in 2008 by Wildlife Branch biologists who based the estimate on analyzing the quality of habitat and comparing this to land habitat models conducted in peer-reviewed literature (A. Reimer, Wildlife Allocations Biologist, Manitoba Wildlife, Government of Manitoba, personal communication 24 January 2025). This technique does not account for myriad cumulative influences and impacts on bear populations. It cannot replace empirical evidence and is very likely inaccurate as it is outdated, having been arrived at 17 years ago. This estimate, erring on the lower side (25,000 to 30,000), was reiterated by Manitoba's director of wildlife in 2019 who noted "this is a big approximation" (M. Arlt, director of Manitoba Wildlife Department, email correspondence 18 October 2019) and that the estimate was not based on recent empirical data (ENR FOIP No. 2324-ENR-0384). Reliable data of population size and trends are critical for planning the management and conservation of black bears, especially given their relatively slow reproductive rate and long lifespan (Garshelis and Hristienko 2006; Twiss and Thomas 1999). With such uncertainty about the bear population size and demographics, there is a significant risk of over-hunting.

Under similar circumstances, Ontario's Environmental Commissioner stated (ECO 2015):

"...incomplete information on the number, age, sex and location of the bears harvested each year prevents the MNRF [Ministry of Natural Resources and Forestry] from effectively evaluating the hunt's ecological impact and making informed management decisions. The consequences of an error in bear management can be significant; black bear populations are vulnerable to overharvest, particularly of adult females, as they reach sexual maturity late in life and have few offspring. As a result, once a bear population is overharvested, it may take a decade or more to recover. Moreover, where black bears are a keystone species, overharvesting could have negative effects on other species and even the entire local ecosystem."

When black bears hunt or scavenge, they provide or limit carrion for scavengers, influencing food webs at larger scales (Allen *et al.* 2014). Mendia *et al.* (2019) report that black bears can alter forest structure in ways that may contribute to wildlife diversity. Despite these and other important ecological services, an environmental impact assessment of Manitoba's spring black bear hunt has not been carried out.

2.2.1 Hunting's Failure to Reduce Human-Bear Conflicts

Hunting of bears can produce unpredicted and inconsistent results and there is no evidence to show that hunting bears consistently leads to a decrease in human-bear conflicts (Northrup *et al.* 2021; Commito 2015; ECO 2015; Obbard *et al.* 2014; Treves *et al.* 2010; Nuisance Bear Committee 2003; Davis *et al.* 2002; Beecham Aff. ¶ 10). When used in human-wildlife conflicts, lethal controls should be the least pain-inducing and selective possible (Fox and Bekoff 2011). There is some indication that spring black bear hunts may actually increase interactions with humans (Northrup *et al.* 2021; Tavss 2013). Tavss (2013) showed that jurisdictions in North America that implemented non-lethal programs saw a significant decrease in conflicts, whereas conflict levels increased where bears were hunted.

Studies consistently show that variation in the abundance of natural foods is the most important factor affecting human-bear conflict levels. When natural foods are scarce, conflict levels between people and bears are known to increase (Northrup *et al.* 2023; 2021; ECO 2015; Hristienko and McDonald 2007; Davis *et al.* 2002). Monitoring these cycles can help predict such circumstances so that more resources can be allocated as necessary, including educational reminders in media to "bear-proof" yards and reduce attractants such as barbeques, fruit trees, bird feeders and garbage bins.

From Jan. 1, 2022 to Dec. 31, 2023, garbage (867 occurrences) and human food (359 occurrences) were two of the top attractants associated with human-black bear conflict reports made through the Manitoba government (ENR FOIP No. 2324-ENR-0384). Other attractants included pet food, barbeques, firepits, and bird feeders, however, no tickets or fines were issued (ENR FOIP No. 2324-ENR-0384).

An increasing body of evidence shows that the most effective and long-lasting solutions to reducing and preventing human-bear conflicts occur when people accept responsibility for making their properties unattractive to bears and for communities to proactively manage attractants such as garbage, pet food, fruit trees, and birdfeeders (WildsafeBC 2025; Northrup *et al.* 2021; ECO 2015; Hristienko and McDonald 2007; Davis *et al.* 2002). In addition to reducing future human-bear conflicts, this results in increased safety for bears and people, and can reduce government costs.

Several jurisdictions across North America stand out for their success in reducing human-bear conflicts through investments in programs with education and animal-resistant waste management systems and enforcement of garbage and no-feed policies (using bylaws with penalties). These include Canmore, Alberta; Whistler, British Columbia; Juneau, Alaska; and Canadian national parks (Beecham Aff. ¶ 12; Hristienko and McDonald 2007).

Black bear cub.

Credit:
Peter Nuij,
Unsplash

Conflicts between black bears and farmed animals are infrequent in Manitoba, with only 141 wildlife compensation claims for predation events reported for the fiscal year 2023/24 (Manitoba Agricultural Services FOIP No. AS-2024-01). When a predation event is confirmed, financial losses to producers are largely absorbed through the province's Wildlife Damage Compensation program, a federally and provincially funded initiative administered by Manitoba Agricultural Services Corporation. There is a lack of evidence to support the efficacy of lethal control when it comes to reducing future predation rates in the long term (Khorozyan and Waltert 2020; Treves *et al.* 2019; van Eeden 2018; Lennox *et al.* 2018; Bergstrom *et al.* 2014). Instead, non-lethal, prevention-based practices, including electric fences, are reliable and effective methods of reducing future damage by bears (Khorozyan and Waltert 2020; Sanders 2018).

2.2.2 Additional Pressures on Black Bears

Black bears are killed by humans, directly and indirectly, in a variety of ways throughout their waking time. They are intentionally killed outside of legal hunting seasons by poachers and in reaction to human-bear conflicts (n = 193 bears killed in 2023) which can include livestock predation events (ENR FOIP No. 2324-ENR-0384). Although there is no trapping season for black bears and it is illegal for a licensed trapper to use a trap to kill a black bear, they are still shot annually for commercial trapping under the authority of a registered trapline permit (ENR FOIP No. 2324-ENR-0384). Because trapping with bait is non-selective, bears can also be injured or killed accidentally in registered trap lines (Proulx 2024), and not all kills are reported to conservation officers, including those killed in "self-defence" or through preservation of property, which remain documented (ENR FOIP No. 2324-ENR-0384). Vehicle transportation routes, both road and rail, are another human-caused mortality factor, with 368 claims involving motor vehicle collisions with black bears in Manitoba in 2022 and 2023 (MPI FOIP No. 24-028). Humans also contribute to the orphaning of black bears through disturbances at den sites, including through snowmobile and cross-country ski trails, and timber and mining operations (GOA 2024; ENR FOIP No. 2324-ENR-0384). More direct interactions also contribute to the orphaning of cubs. For example, a mother bear killed by a vehicle or after a conflict with humans (GOA 2024; ENR FOIP No. 2324-ENR-0384). An important indirect threat to bears is the loss and degradation of their habitat. Further climate change may impact the availability and quality of resources bears depend upon, increasing pressure on the population. All of these factors operate cumulatively.

2.2.3 Case Study: Ontario

Ontario's Ministry of Natural Resources and Forestry (MNRF) "cancelled the annual spring hunt for black bears in 1999 to prevent cubs from becoming orphaned and starving to death" (ECO 2015, p. 134). Contrary to criticism claiming otherwise, evaluation of data in 2003 showed that the cancellation of the hunt did not result in a significant increase in nuisance bear activity (ECO 2015), which was further substantiated (Northrup *et al.* 2023; 2021).

Ontario's Environment Registry created an independent Nuisance Bear Review Committee, which determined in 2003 that the increase in human complaints "was not related to the cancellation of the spring hunt but rather to the periodic scarcity of natural foods" (ECO 2015, p. 134) and that over 50% of complaints reviewed by the committee involved "the presence of garbage, barbecues or grease – attractants the committee considered easy to remove." Furthermore, when examining the increase in bear complaints, the committee found no evidence of a relation between the number of complaints about bears and the actual frequency or severity of human-bear conflicts (ECO 2015), suggesting social influences caused increased reporting.

The committee further concluded that "there was no evidence that spring harvest reduced nuisance bear activity," recommending that public education and enforcement (e.g. bylaws) around responsible human behaviour (i.e. removing bear attractants) would better serve to reduce human-bear conflicts (ECO 2015, p. 134). A "Bear-Wise" program was launched in 2004, and by 2006 the MNRF had developed a toolkit to guide municipalities to incorporate "Bear-Wise" bylaws to manage garbage and other attractants, although municipal implementation was inconsistent (ECO 2015). Unfortunately, significant funding and staffing cuts were made to the Bear-Wise program in 2012 (ECO 2015).

The Ontario Environmental Commissioner's 2014/2015 (p. 136) report stated:

"...recent research by the ministry's own scientists and staff found no significant correlations between harvest and subsequent [human-bear conflicts]" and "[that] removing more bears did not reduce subsequent conflict."

In 2014, contrary to almost all recommendations put forward by the province's own experts, a spring black bear hunt was re-introduced in several northern jurisdictions for residents, despite some of these areas not following through with provincially recommended garbage management to prevent human-bear conflicts. It should be noted that the purpose of restarting a spring hunt was to reduce human-bear conflicts and to improve public safety (ECO 2015, p. 135). In actuality, there was no evidence to support claims of increased levels of human-bear conflict in the major jurisdictions where the spring hunt was reopened (ECO 2015, p 138). Ontario's decision to reintroduce the spring bear hunt remains highly contested and is considered by many to be politically driven as data does not support the decision and elected officials were heavily pressured by the hunting lobby to reintroduce the hunt. Two years later, another Ontario government extended the spring bear hunt to allow non-residents to participate, again acting against the advice of government advisors and published data.

Recent and more robust data analysis of human-bear interactions in Ontario by Northrup *et al.* (2023; 2021) from 2004–2019 provides further evidence that human-bear interactions were not reduced in Ontario after re-initiating a spring black bear hunting season. This analysis demonstrated that interactions between people and black bears were higher in areas with a new spring hunt season compared to control areas (Northrup *et al.* 2023; 2021).

2.3 Economics of Ecotourism

Based on the number of resource tourism operator licences, 173 black bear outfitters were in operation in 2024, 133 in 2023, and 121 in 2022 (NRI FOIP 2425-NRI-0008). Although local and provincial economic contributions are generated from hunting black bears through non-resident hunters who pay significant sums to a small number of licenced outfitters for guiding and licence fees (Commito 2015), equal or greater amounts of revenue could be generated through ecotourism, such as bear viewing and other non-consumptive opportunities for tourists seeking outdoor experiences. A literature review by Honey *et al.* (2016) demonstrates that wildlife ecotourism has greater economic value than sport hunting over the life span of the animal, and sometimes annually.

As a reflection of changing attitudes and an improved understanding of bear biology and effective management strategies, several U.S. states with black bear populations have ended spring hunting seasons (Block K. 2022; Hristienko and McDonald 2007), including Washington[1], Colorado[2], California[3], Michigan[4], Minnesota[5], Wisconsin[6], and Florida[7].

In 2011, wildlife viewing in the United States had over five times more participants than those who went hunting, according to a survey by the U.S. Fish and Wildlife Service, and generated over 60% more in spending (Honey *et al.* 2016). Bergstrom *et al.* (2014) indicate that in 2013, American non-consumptive users of wildlife in native habitats generated more than $100 billion in total economic activity.

As mentioned during the Introduction of this report, American black bears are indigenous only to North America. Given the recent volatility with the U.S., developing an ecotourism industry less reliant on consumptive American hunters and more focused on European travelers and those wishing to witness black bears in their native habitat would allow for significant economic gains while improving the public profile of Manitoba.

2.3.1 Case Study: British Columbia

Studies on the comparative economic value of bear viewing and bear hunting in the Great Bear Rainforest of British Columbia's coast show that economic gains made through bear viewing are far greater than those generated through bear hunts with guide outfitters, providing more economic opportunities, a greater source of revenue, and an increased GDP (Honey *et al.* 2016; Center for Responsible Travel 2014). Bear viewing companies generated 12 times more visitor spending than non-resident and resident hunters combined, and more than 10 times the government revenue (Honey *et al.* 2016). Bear-viewing companies also provided more jobs than hunting (Honey *et al.* 2016; Center for Responsible Travel, 2014).

1 https://wdfw.wa.gov/hunting/special-hunts/bear
2 https://cpw.state.co.us/hunting/big-game/bear
3 https://wildlife.ca.gov/Hunting/Bear
4 https://www.michigan.gov/-/media/Project/Websites/dnr/Documents/LED/digests/Bear_Hunting_Digest.pdf?rev=e1b105afe7b54942b931a05601b13355
5 https://www.dnr.state.mn.us/gohunting/bear-hunting.html
6 https://dnr.wisconsin.gov/topic/hunt/bear
7 https://myfwc.com/hunting/bear/

3.0 Conclusion and Recommendations

In Canada and abroad, bear hunting is losing popularity (Center for Responsible Travel 2014), and many believe that bears should not be treated as commodities. Spring bear hunts present a growing controversy and ethical debate, with several factors supporting an end to the practice. Spring hunt seasons on black bears can have unpredictable outcomes and cannot be effectively regulated (Beck *et al.* 1995). Thus, spring hunting of black bears is considered unreliable as a management tool (Beck *et al.* 1995). Further, Manitoba's spring bear hunt, with its inevitable orphaning of cubs, is unethical and may not be biologically or ecologically sustainable. Mother bears nurture cubs and prepare them for life as an adult. It is generally accepted that where spring hunting of bears occurs, orphans are left to suffer, both psychologically and physiologically, before they die.

In addition to these strong moral concerns, no biological or economic rationale exists to continue the practice. Specifically, there is no clear evidence to support claims that a spring bear hunt is a reliable or necessary tool for managing bear populations; nor that it reduces conflicts among people and bears, or farmed animals and bears. Only a small fraction of the population benefits financially from the spring black bear hunt compared with the potential for greater economic gains through nature-based tourism and wildlife viewing, which remain largely untapped.

There is a consensus in the scientific literature that human-bear conflicts are affected not by hunting but by natural food levels and garbage availability. When addressing human-bear conflicts, the only proven and reliable way to increase public safety is to invest in education and enforcement programs and work at the community level to ensure proper implementation of the programs.

Orphaned bear cubs do not typically die without experiencing significant levels of distress and pain over a prolonged period. In jurisdictions where the public was made aware of this fact, social and political fallout resulted (Honey *et al.* 2016; Commito 2015; Fox and Bekoff 2011). This could be averted by tapping into the potential economic stimulus gained through non-consumptive experiences with nature such as bird watching, bear watching, hiking, wildlife photography and forest bathing.

Public attitudes are changing toward the destruction of wildlife (Davis *et al.* 2002; Pacelle 2008; Bergstrom *et al.* 2013), as reflected by Nova Scotia's decision against opening a spring bear hunt. Nova Scotia and several U.S. states demonstrate a broad shift in societal attitudes, reflected by increased scrutiny and public demand for the treatment of wild animals to be ethical and in line with policies that are humane, effective *and* based on scientific evidence (Dubois *et al.* 2017; Artelle *et al.* 2014).

On a planet that supports millions of other species, it is time for political decisions about wildlife policies on management, conservation, and interactions to apply ethical consideration to animal welfare and reciprocal relationships with non-human animals and the environment.

Considering these factors, it is understandable that opponents of spring black bear hunting may discredit agencies that support policies which allow them. Little is known about how the spring hunting of black bears in Manitoba impacts bear numbers, demographics (sex, age), behaviours (territory size, reproductive rate, cub survival), relations with humans (conflicts with humans, farmed animals including beehives, fruit trees), or provincial and local economic losses and gains from comparative tourism revenue and management costs. A more accurate population count of black bears is warranted, using empirical methods rather than estimates of a living population based on the number of dead bears reported through voluntary hunter surveys and conflicts reported. It is highly recommended that a black bear conservation plan be devised and updated regularly to ensure practices are based on the best available science and traditional ecological knowledge, and include considerations of animal welfare, ethics and ecology.

The spring bear hunt warrants wildlife policy reform as this recreational activity does not meet current knowledge of best practices for black bears and does not reflect the values of the province and its residents.

The spring black bear hunt should be discontinued in Manitoba. At the very least, the precautionary principle would entail the province enact a moratorium on the spring hunt while these impacts can be studied, comprehended, and considered.

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"Although it may be intuitive to assume that harvesting more bears should reduce [human-bear conflicts], **empirical support for this assumption is lacking despite considerable research**."

The Ontario Environmental Commissioners Report 2014/2015