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Executive Office
625 Fisgard Street, PO Box 1000
Victoria, BC V8W 2S6

P: 250.360.3125
F: 250.360.3130
www.crd.bc.ca

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File: 0400-40

The Honourable Julie Dabrusin
Member of Parliament
The House of Commons
Ottawa, ON K1A 0A6
Via email: Julie.Dabrusin@parl.gc.ca

Dear Minister Dabrusin:

RE: NON-MIGRATORY CANADA GEESE IN THE CAPITAL REGION

On behalf of the Capital Regional District (CRD) Board, I am writing to request support for the management of non-migratory resident Canada geese in the capital region. Specific requests for support are outlined in Appendix A and include considerations to streamline and provide exemptions under Damage or Danger permits (federal crop protection permits) and to designate the resident, non-migratory Canada goose population as overabundant.

Historically, Canada geese did not nest on southern Vancouver Island. They were introduced at Elk Lake by the federal Canadian Wildlife Service, and the former British Columbia Fish and Wildlife branch in the 1960's and 1970's to increase wildlife viewing and hunting opportunities. These young geese, who were unable to learn migrating behaviour from their parents, interbred and created a hybrid population of non-migratory, resident geese. As the region became more urbanized, natural predators and hunting opportunities were reduced and this resident Canada goose population expanded largely unchecked.

Currently there are around 6,000 resident Canada geese in the capital region; this number expands to more than 10,000 during the migratory season. The CRD's request for support reflects ongoing and growing concerns regarding the significant agricultural, ecological, and public health impacts associated with this overabundant, introduced population of resident Canada geese in the region.

In 2023, the CRD Board established the Regional Canada Goose Management Service to work with key regional partners and governments to reduce the impacts of the rapidly growing resident Canada Goose (CAGO) population and coordinate implementation of the 2012 Regional Canada Goose Management Strategy (RCGMS). Activities in the first three years of service appear to have successfully stabilized the population; however, more resources are required to maintain the substantial population reduction required to meaningfully ease the environmental, recreational, and economic impact across the region.

The federal and provincial governments were responsible for the introduction of Canada geese to this region and have an ongoing responsibility to manage wildlife. The CRD requests the Minister designate appropriate staff to work with the CRD and federal representatives to provide regulatory, technical, and financial support to address the overabundant population of non-migratory Canada geese in the region.

Sincerely,



Cliff McNeil-Smith
Chair, Capital Regional District Board

Attachment: Appendix A - Requests for Support

cc: Honourable, Stephanie McLean, MP, Esquimalt-Saanich-Sooke
Elizabeth May, MP, Saanich-Gulf Islands
Will Greaves, MP, Victoria
Jeff Kibble, MP, Cowichan-Malahat-Langford
CRD Board
Ted Robbins, Chief Administrative Officer, CRD
Luisa Jones, General Manager, Parks, Recreation & Environmental Services CRD



REGULATORY SUPPORT

The CRD requests that Environment Canada and Climate Change, Canadian Wildlife Service consider the following updates and possible exemptions to the Migratory Bird Regulations (MBR) and Damage and Danger permits (crop protection permits):

1. **Designate the resident non-migratory population of Canada geese on Vancouver Island as locally overabundant.** This designation would support management approaches and enable regulatory tools such as:
 - Special hunting seasons: These can be created to specifically reduce the population of resident non-migratory Canada geese.
 - Higher bag limits: It is proposed to remove the daily bag limits for Canada geese in hunting districts 1-1 to 1-4.
 - Increased possession limits: Allow unlimited possession limits for overabundant geese.
 - Use of recorded calls: Enable the use of recorded Canada geese to attract geese to a specific area.

Rationale:

- In the 1960's and 1970's the Canadian Wildlife Service implemented a Canada Goose (CAGO) introduction program, the former provincial Fish and Wildlife branch and various other organizations to increase wildlife viewing and hunting opportunities in the capital region. The introduced geese were young birds from various subspecies who were unable to learn migrating behaviour from their parents. These geese interbred, creating a hybrid population of non-migratory resident geese which are not native to the region.
 - According to Christmas Bird count data, the current Vancouver Island CAGO population ranges from 16,000 to 21,000 with an estimated 9,000 to 11,000 birds over wintering in the capital region. A winter survey (February 2025) in the capital region counted 9,200 geese, most of which were located on agricultural lands. Over the past two years, summer surveys (July) have documented 6,000 to 6,700 moulting geese. These nesting geese are the resident, non-migratory population. These data confirm a substantial and growing population that continues to impact agricultural lands, natural ecosystems and human health and safety.
 - The agricultural community has been heavily impacted and Canada geese have put the local food security of our area in peril. Their consumption of food crops and winter cover crops degrade soils, prevent soil regeneration and renders fields unfarmable. Selective feeding alters the species composition of hayfields, reducing fields that support our local livestock. Key crops such as cabbage, strawberries and lettuce have been removed from local markets, and some farmers have faced losses significant enough to force them out of the farming business.
 - During the moult, hundreds Canada geese congregate in the many bays and estuaries around the capital region. Severe impact to estuary habitats, especially Carex sp., has resulted in a significant loss of important salmon rearing habitat.
2. **Update Schedule 3, Part 10 of the MBR, 2022 to create Special Measures for Overabundant Species in British Columbia (Table 3) that include Canada geese** like those that exist in other provinces (e.g. Manitoba, Nunavet, and Quebec). Special measures for Canada geese on Vancouver Island should include:
 - Use of electronic calls and blinds
 - Increased bag limits
 - Increased possession limits
 - Use of additional weapons

3. **Update Migratory Bird Regulations to enable exemptions under Kill to Scare, Damage or Danger Permits (Crop Protection Permits)** to allow the permits to function more effectively as a population management tool for this overabundant population of Canada geese. This could include:
 - Under Section 37, allow the use of .22 caliber rifles when safe to do so. Many agricultural lands within the capital region are relatively close to more densely populated residential areas. Current regulations limits firearms to not larger than a 10-gauge shotgun, which creates significant noise. Many farmers have received noise complaints from neighbours and have abandoned hunting due to the restrictions. The noise from the 10-gauge shotgun often scares the congregating geese from the area, making hunting ineffective.
 - Enable the use of blinds. Bow hunting could be an effective population management tool in agricultural areas, particularly those near residential areas. However, the bow hunter needs to get close enough to the bird to be successful. Without a blind, any movement by the bow hunter effectively hazes the geese from the area, making bow hunting largely ineffective for crop protection. If blinds were allowed for use in certain conditions and in specified areas, bow hunting as a population management tool may be a more effective option.
 - Remove the requirement to leave carcasses on the ground to act as deterrent to other birds. This requirement discourages hunters and agricultural producers from participating in Crop Protection because the meat cannot be used and leaving the carcass does not appear to deter other geese from using the same area, although it does attract raptors to the area.
4. **Allow flexibility for exceptions under MBR, 2022 Section 64(1) provincial killing permit, Section 65(2) federal scaring or killing permit, and Section 69(b) to discharge firearms within 50 m of any body of water** to support goose population management activities in the region's drinking water supply area and in impacted agricultural areas with ponds to prevent geese from causing a danger to human health or public safety or damage to agricultural areas and crops where geese congregate near bodies of water.

Rationale:

- The CRD manages the Greater Victoria Drinking Water Supply Area (GVDWSA), which includes the Sooke, Goldstream and Leech (future supply) watersheds, and is responsible for providing safe drinking water to 430,000 residents. The Greater Victoria Drinking Water System (GVDWS) is an unfiltered drinking water supply that uses a multi-barrier approach to prevent contaminants from entering the water distribution system.
- The feces of Canada geese are known to harbour pathogenic microbes^{1,2} including protozoa and bacteria. These pathogens are public health concerns as they can contaminate drinking water supplies and cause disease outbreaks in humans through the consumption of water.
- It is imperative that the CRD immediately control the Canada goose populations in the Drinking Water Supply Area as they could compromise the system's source water protection barrier. Immediate removal of Canada geese prior to nest establishment is required, otherwise, there is too great a reliance upon ultraviolet light as the final barrier to kill pathogens carried by geese.
- Due to the threat that Canada geese pose to the drinking water supply in Greater Victoria, the Capital Regional District needs to be able to take the necessary steps to remove geese from the GVWSA reservoirs.

¹ Nagamori Y, Litherland MA, Koons NR, Linnthicum AR, Ramachandran A. Survey of zoonotic parasites and bacteria in faeces of Canada geese (*Branta canadensis*) in North-Central Oklahoma. *Vet Med Sci.* 2022 July; 8(4):1825-1834. Doi:10.1002/vms3.791.Epub 2022 Mar 22. PMID:35316562; PMCID: PMC9297773.

² Elmberg J, Berg C, Lerner H, Waldenstrom J, Hessel R. Potential disease transmission from wild geese and swans to livestock, poultry and humans: a review of the scientific literature from a One Health perspective. *Infect Ecol Epidemiol.* 2017 Apr 10;7(1):1300450.doi:10.1080/20008686.2017.1300450. PMID: 28567210; PMCID: PMC5443079.

- Currently, the CRD attempts to remove geese under the authorization of a Danger and Damage Permit. However, under 69(1)(b) of the Migratory Birds Regulation, permit holders referred to in section 64 or 65 must not discharge firearms within 50 m of any body of water. Most geese found in the GVWSA are on or adjacent to the reservoir water source. As a result, the CRD is limited to using scare tactics.
 - Many farms have irrigation ponds and other large water sources, which are an attractant to Canada geese and this restriction can prevent agricultural producers from protecting their crops.
 - Under Sections 64 and 65 of the MBR, the Chief Provincial Wildlife Officer and Minister, respectively, may issue a permit to kill migratory birds of a specific species during a specified time and in a specified area, if the Chief Provincial Wildlife Officer and the Minister are satisfied that scaring migratory birds is not a sufficient deterrent to prevent the birds from causing a danger to human health or public safety or damage to crops or other property in a province.
 - The CRD requests support from the Minister to enable killing of geese in the GVWSA within 50 m of a water source to protect the drinking water supply for Greater Victoria.
5. **Allow for multi-year permits** to streamline the process and reduce administrative burden on the agricultural community, local governments, provincial and federal regulatory agencies.

FINANCIAL, TECHNICAL AND RESEARCH SUPPORT

Funding for the Regional Canada Goose Management Service (\$300,000/year) is borne by taxpayers of the capital region. The CRD requests that Environment Canada and Climate Change, Canadian Wildlife Service consider the following requests for financial, technical and research support:

1. **Technical support to review Regional Canada Goose Management Strategy (RCGMS) target Canada goose population.**
 - RCGMS identifies a target population of 1,000 geese for the capital region.
 - CRD staff would like to work with federal and provincial staff to review this target and update it if required.
2. **Data Sharing with Lure Crop Program**
 - The Government of Canada and the Province of BC have a program that identifies areas of cropland that remain unharvested for the purpose of luring migratory birds away from other unharvested crops nearby and that is designated as such.
 - Lure cropping locations within the Capital Regional District could be shared with CRD staff to inform the Goose Management program.
 - CRD staff conduct annual moult surveys and bi-annual winter surveys of Canada geese across the region. This seasonal population monitoring data could be shared with the provincial and federal agencies and overlain with lure crop locations to assist in determining the effectiveness of the program.
 - Exchange of information would be beneficial to both parties. Known lure cropping locations could be provided to CRD staff and goose population monitoring could be conducted specifically at those locations and the data shared with other parties.
3. **Support goose population research on Vancouver Island**
 - Funding support for goose banding programs and radio collars. Several regional districts and stewardship groups on Vancouver Island and across the Salish Sea are suffering the impacts of the overabundant, non-migratory goose populations.

- There is interest in a Salish Sea Canada goose banding and collaring program to obtain data on seasonal and inter-regional movements of Canada geese.
 - These data could be used for ongoing planning of goose population management efforts.
 - Work with CRD and potentially regional governments across Vancouver Island/Salish Sea on a banding and collaring program to determine the overall population of resident, non-migratory geese.
 - Technical and financial support from the federal government should be considered.
4. **Support for First Nation traditional waterfowl harvesting methods**
- The CRD is working to engage local First Nations communities in the goose management program including egg addling programs, population monitoring programs and harvests.
 - Currently, the CRD contracts a third-party to conduct annual harvests of Canada geese with interested First Nations communities. Up to five First Nations communities have participated in previous harvests. During the harvest, First Nations adults and youth are learning how to harvest and dress a bird, regaining some skills that have been lost over time. Additionally, the meat from the harvested birds is processed and shared among the participating communities.
 - Some First Nations communities have expressed that their right to hunt and fish as formerly, included the harvesting of waterfowl during the moult, and that they have a desire to return to traditional methods of harvesting waterfowl.
 - The CRD would like to have discussions with provincial and federal agencies and local First Nations communities to explore potential funding to support these communities in returning to traditional waterfowl harvesting methods.
5. **Update the *Canada and Cackling Geese: Management and Population Control in Southern Canada Handbook***
- This handbook is a good source of information; however, it was last updated in 2010. This document should be updated to include recent research and population numbers.
 - Within the handbook, reduce the reliance on use of hazing as a management technique particularly in areas where the resident Canada geese have become overabundant.
 - Address the use of drones as a scare tactic.
 - Update to reflect 2022 updates to the MBR including how it addresses the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).
 - Emphasize the importance of lethal methods to deal with overabundant, resident, non-migratory geese as population reduction is the only effective means to meaningfully reduce the economic, public health and environmental impacts.