



ALBERTA WILDERNESS ASSOCIATION

*"Defending Wild Alberta through Awareness and Action"*

March 15, 2011

**The Hon. Ed Stelmach**

Premier of Alberta

Room 307, Legislature Building

10800 – 97th Avenue

Edmonton, AB T5K 2B6

Email: [Premier@gov.ab.ca](mailto:Premier@gov.ab.ca)

Dear Premier Stelmach:

**Re: Bill 11 – Livestock Diversity Amendment Act 2011**

Alberta Wilderness Association (AWA) is writing in response to Bill 11 – Livestock Diversity Amendment Act 2011. It has come to our attention that the amended legislation has already passed second reading, and that the provincial government has failed to act transparently in its operations. We believe this government has failed to act in the province's best interest.

If passed, the Bill will reclassify domestic cervids as "diversified livestock". Common domesticated livestock, such as cattle, have been studied for hundreds of years, and our understanding of their pathologies far exceeds that of wild game. This knowledge cannot simply be transferred between species, thus wild game must not be treated as livestock either in practice, or within legislative documents.

Furthermore, the discretionary power given to the Minister in Section 10.1 is of grave concern, and we fear it will pave the way for the establishment of elk and deer penned "hunting" farms. In past years there has been tremendous national opposition to allowing hunting on game farms, and today such operations only persist in Saskatchewan and Quebec. The diversity of concerned citizens involved in these campaigns indicates the importance of this issue, and the level to which these practices are considered unethical and inhumane.

AWA believes it is well documented that the game farming industry is both ecologically and economically unsustainable. It is well known that this industry is responsible for infecting North American deer and elk with Chronic Wasting Disease (CWD). This knowledge has animated AWA's consistent opposition to the licensing and support of this industry. The last few years have seen a tremendous increase in public concern about the CWD issue and, with 16 new cases reported in Alberta since September 2010, the fact that we are no closer to resolving the problem is discouraging and unsettling. CWD management has already resulted in substantial economic losses to both ranchers, and the provincial government. The chronic wasting disease hunter surveillance program alone cost \$500 000 for 2009-2010. Perhaps it is time to consider there is little indication that the game farming industry is viable. We ask that you consider the social, economic, and environmental implications of this legislation before acting in the interest of a small minority.

In previous years, namely 2001, the Alberta government considered requests to allow hunting on game farms as a means of diversifying the economic opportunities available to those involved in the game farm industry. Then Premier Ralph Klein was vehemently opposed to these requests, describing them as "abhorrent," and we hope that once again our Premier will take a stand on an issue that so many blatantly oppose. Without an open public consultation process, Bill 11 must not be passed as it currently stands. We are writing today to ask you to carefully consider this matter, and to remind you that in order to best represent the public interests of Albertan's you must first consult with those you represent. We look forward to a reply at your earliest convenience.

Yours truly,

**ALBERTA WILDERNESS ASSOCIATION**



Madeline Wilson  
Conservation Specialist

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