



**ALBERTA WILDERNESS ASSOCIATION**

*"Defending Wild Alberta through Awareness and Action"*

March 19, 2013

Honourable Diana McQueen  
Minister of Environment and Sustainable Resource Development  
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Dear Minister McQueen

**Re: Provincial wolf bounty**

I'm writing to you to express the serious concerns held by Alberta Wilderness Association (AWA) and many Albertans that your ministry has lost control of wolf management in the province and effectively devolved it to private special interest organizations. Irrespective of whether or not wolves need controlling in some parts of the province, the decision should be a clear and public decision made by provincial wildlife managers within your ministry.

Details from a Freedom of Information and Protection of Privacy Application received by AWA in October 2011 reveal that:

- Wolf bounty or incentive programs have recently been run by the following municipalities:
  - Clearhill County
  - MD of Big Lakes
  - MD of Bonnyville
  
- Private wolf bounties are also offered in:
  - Sundre
  - Rocky Mountain House
  - Drayton Valley
  - Grande Cache
  
- Bounties are even offered for the killing of wolf cubs.
- Funding for some of these programs comes primarily from a Wyoming-based organization, the Wild Sheep Foundation. So essentially a foreign special interest group is paying for Albertan

wolves to be killed with no scientific justification, and your ministry is unable or unwilling to do anything about the situation.

- Your Fish and Wildlife staff are fully aware that there is not a shred of scientific justification that operating a wolf bounty has any effect on reducing wolf predation on livestock; it quite simply does not work.
- There are plenty of ways to address issues of predation on livestock before killing wolves. Other options include improved carcass management (dead livestock are an attractant to wolves), improved livestock oversight at sensitive times of year and tools such as electric fencing and fladry.
- Fish and Wildlife staff continue to wash their hands of the issue of private wolf bounties, insisting that it is out of their hands and that such bounties are “not illegal.” Even when bounties are offered on public land (under a grazing lease), your ministry refuses to take action.
- Unregulated wolf kills can have the direct opposite of the intended effect, and increase wolf predation on livestock. As one of your staff noted, “It is possible for wolves to coexist with livestock without causing many problems and when this occurs it is important to maintain that pack in the area rather than kill it off, which creates a vacant territory for a pack which may kill livestock.”

There are many problems with wolf bounty programs, particularly when they are not run by the provincial government. These include:

- Wildlife in Alberta is a “public resource.” As such, all Albertans have a right to a say in wildlife management. Private wolf bounties deny this right.
- No records are being kept of overall numbers of wolves being killed by bounty programs.
- Unenforceable wolf killing, including random use of poison and traps and killing of “non-target” wildlife and livestock. AWA has been informed of incidents of horses being caught in traps intended for wolves.
- ESRD staff are trained in wolf control, and have strict guidelines in the use of lethal control. Strychnine can now be used only if other options have already been tried. No such restrictions apply to individuals.
- ESRD have a policy of not using strychnine in grizzly bear areas. How is this enforced for private individuals?
- There is no way of verifying the origin of dead wolves so MD bounty systems are open to abuse.
- There is no accountability.

In a recent letter to an Albertan resident, you wrote “The Government of Alberta recognizes the importance of wolves and other predators as a key part of healthy ecosystems. Our approach to wolf management is to work with livestock producers and local communities to reduce or prevent livestock losses to predators.” In this spirit, AWA strongly believes that it is time for your ministry to take back the management of its provincial wildlife. AWA respectfully requests that:

- All wolf bounties or incentives on public land be immediately halted.
- New regulations must be introduced to ensure that wildlife management is not devolved to local authorities and hunting organizations. It should clearly lay out that “bounties” and “incentives” to randomly kill wolves are prohibited.
- Wolf management, and indeed all wildlife management, must be carried out according to sound scientific principles.
- Wolf management must be carried out in an open and transparent fashion.
- Alternatives to lethal wolf control must be exhausted before lethal controls are considered.

- Fish and Wildlife staff must be adequately resourced to allow them to adopt livestock protection measures' which are the most effective in the long run, not just the cheapest in the short run.

In December of 2009 I wrote to the Honourable Minister Ted Morton about wildlife concerns on Caw Ridge and in Conklin when the shooting of black bears rather than enforcing garbage management was exposed. I copy part of that letter here as it remains one of AWA's most pressing concerns – our **outdated and inappropriate wildlife policy and legislation** that applies to the wolf bounty issue as well.

December 7, 2009

*"Wildlife Policy and Legislation*

*One consistent thread which runs through both the Caw Ridge and Conklin bear issues is the lack of consistent legislative tools to allow the province to manage wildlife concerns. ....*

*Alberta's Wildlife Policy is 30 years old and does not represent today's science or the public's regard for wildlife. The 1980 policy was written at a time when there was far less regard for the intrinsic value of wildlife, when certain populations were seen as inexhaustible and the primary consideration was for "wildlife to pay its way". This sort of thinking is seriously outdated and inadequate. Sound policy could have guided decisions on Caw Ridge that your staff agonized over during the last round of coal explorations, and could have prevented the Conklin debacle from ever being allowed to develop. The land-use regulations you highlight, the Public Lands Act and Alberta land Stewardship Act, are important pieces of legislation; they are vital pieces of the rules and regulations needed today. But the public, and indeed wildlife, would best be served with an equally important and up-to-date Wildlife Policy and Wildlife Act.*

*What follows are some principles related to wildlife that our association has valued and promoted throughout the past 44 years. In fact, some of the principles were the binding force that saw AWA formed in the mid 1960's. Some of the principles are also part of a wildlife Policy for Canada from Environment Canada.*

*We respectfully request that development of Alberta's guiding policy and legislation for wildlife be given priority and that the new tools address the following important values and principles.*

- 1. Wildlife has intrinsic value in and of itself.*
- 2. Healthy natural populations of wildlife depend entirely on the health and abundance of their habitat. Wildlife is an integral part of the environment in which we live and as such is a key indicator of the health of that environment.*
- 3. We all share in the responsibility to ensure the retention of the full complement of all living things within healthy, natural ecosystems. Alberta's species at risk are not adequately covered under current policy and legislative documents and must be.*
- 4. Effective conservation of wildlife relies upon a well-informed and involved public. Alberta wildlife is a public resource and the Alberta public has a responsibility to be involved and to ensure wildlife decisions protect that resource. Basic and applied scientific research is essential for understanding of ecosystems and their wildlife components and this must be supported within government, and the costs borne by taxpayers.*
- 5. Wildlife is a source of food and a vital part of the culture and economies of some aboriginal peoples.*
- 6. We all have a responsibility for the stewardship of wildlife and we all share in the costs of conserving and managing wildlife. Our elected governments are accountable for its management. Those whose actions result in costs to wildlife must bear them.*

7. *Taking care of habitat and the wildlife that depends on it must be our primary goal, rather than belated investment in restoration and recovery.*

*AWA is concerned that Alberta's Wildlife Policy and Act are not protective of wildlife. We strongly believe there is an urgent need to have sound and powerfully devised policy and legislative documents that will protect our wildlife. "*

As we said to Minister Morton, we say to you now Minister McQueen, AWA is hopeful that you will give serious consideration to our request and we look forward to hearing from you at your earliest convenience on the matter of bounties and the matter of Wildlife Policy and Legislation.

Yours truly  
ALBERTA WILDERNESS ASSOCIATION



Christyann Olson  
Executive Director