



ALBERTA WILDERNESS ASSOCIATION

"Defending Wild Alberta through Awareness and Action"

Honourable Robin Campbell
Minister of Environment and Sustainable Resource Development
#323 Legislature Building
10800 - 97 Avenue
Edmonton, AB T5K 2B6

Via email: west.yellowhead@assembly.ab.ca

April 10, 2014

Re: Urgent need to remove bat species from the Alberta Non-Licence Animal List

Dear Minister Campbell,

Alberta Wilderness Association (AWA) requests the immediate removal of all nine bat species from the Non-Licence Animal List. Hibernating and migratory bat species are facing imminent risk of significantly reduced populations from disease and wind turbine deaths, respectively, and require formal protection instead of being considered "pests."

AWA, founded in 1965, works throughout Alberta towards more representative and connected protection of the unique and vital landscapes that are the source of our clean water, clean air and vital habitat for wildlife in each of our six natural regions. With over 7,000 members and supporters in Alberta and across Canada, AWA remains committed to assuring protection of wildlife and wild places in Alberta for all Canadians.

With most Alberta bat species assessed as endangered, sensitive or of special concern, it is time to update Alberta bat policies to reflect their vital ecological role. In February 2012, an emergency assessment subcommittee of COSEWIC (Committee on the Status of Endangered Wildlife in Canada) assessed three hibernating bat species as endangered in Canada – tri-colored bat (*Perimyotis subflavus*), little brown myotis (*Myotis lucifugus*), and northern long-eared myotis (*Myotis septentrionalis*). The two species found in Alberta, little brown myotis and northern long-eared myotis, not only lack protection in Alberta but remain on the 2010 Non-Licence Animal List, designating them as pests that do not require a licence to hunt, trap, kill or re-locate. The long-legged myotis is another hibernating bat that has an 'undetermined' status in Alberta and is also listed on the Non-Licence Animal List. Considering the rapid spread of White Nose Syndrome (WNS) caused by the fungus *Geomyces destructans* and the resulting

catastrophic population declines of several hibernating bat species in eastern Canada and United States, a pre-emptive cautionary approach to their management is necessary. A single little brown myotis can consume 4 to 8g of insects each night during the active season. The loss of over one million bats in the northeastern United States has resulted in over 1,000 metric tons of insects no longer being eaten each year by bats.

Although WNS has not yet been detected in Alberta, AWA is concerned that the epidemic is now at Lake Superior and spreading westwards through bat populations at 200-400 km/year. There is a potential for WNS to affect over a million Alberta bats in just a few years. This will not only have an ecological impact but a significant economic impact as well, on both agriculture and forestry. A study published in *Science* in 2011 estimated the value of bats to the U.S. agricultural industry was anywhere from \$3.7 billion/year to \$53 billion/year. These estimates do not include the additional savings of reduced downstream costs of pesticide use.

Of the remaining six bat species on the Non-Licence Animal List, hoary bats (*Lasiurus cinereus*) and silver-haired bats (*Lasionycteris noctivagans*) are listed as 'sensitive' in the current *General Status of Alberta Wild Species* report. Populations of hoary and silver-haired bats, two migratory tree-dwelling bat species, have been impacted by fatalities caused by increasing numbers of wind turbines along their migratory routes. Small-footed myotis (*Myotis ciliolabrum*) was identified in 2010 as a 'species of special concern' by Alberta's Endangered Species Conservation Committee. The list of sensitive and special concern species and the Non-Licence Animal List should be mutually exclusive; animals that appear on one should definitely not be on the other.

It is also contradictory to have established an Alberta Bat Action Team (ABAT) devoted to the conservation of bats in Alberta and yet continue to convey to the public that bats are a pest that can be killed without a licence. ESRD's bat information page under the Fish and Wildlife sub-section of its website states that "bats are generally shy and gentle creatures by nature, but they can often be misunderstood by people who encounter them." Listing all nine of Alberta's bats on the Non-Licence Animal List is likely contributing greatly to this misconception (please see [CBC post: Alberta's list of backyard pests, May 22, 2013](#)).

Minister Campbell, we urge you to remove Alberta's wild bat species from the Non-Licence Animal List to ensure the proper conservation and protection of this ecologically and economically significant animal.

We look forward to your reply at your earliest convenience.

Sincerely,
ALBERTA WILDERNESS ASSOCIATION



Brittany Verbeek, Conservation Specialist