



Alberta Wilderness Association  
*"Defending Wild Alberta through Awareness and Action"*

October 3, 2021

Hon. Jason Nixon  
Minister of Environment and Parks  
Government of Alberta  
Via email: [aep.minister@gov.ab.ca](mailto:aep.minister@gov.ab.ca)

### **Wildlife Management and the Vision for Recreational Hunting**

Dear Minister Nixon;

Alberta Wilderness Association (AWA) appreciates the opportunity encourage our members and supporters to provide feedback on the draft Wildlife Management and the Vision for Recreational Hunting (hereafter 'the draft') to help improve wildlife management practices in our province. As you know, AWA is an Alberta-based conservation group with over 7,500 members and supporters in Canada and around the world. Founded in 1965, AWA seeks the completion of a protected areas network and good stewardship of Alberta's public lands, waters, and biodiversity for all Canadians.

In this letter, we would like to point out some issues that we have with the draft, and indicate the direction that we would like to see wildlife management in Alberta go. In particular, we think that in the draft, AEP has misidentified the North American Model for Wildlife Conservation and left out important principles. We would like to see a separate species-at-risk act implemented, better public access to Crown lands, and a commitment to not allow cervid harvesting preserves (hunt farms).

The draft document commits Alberta to following the "North American Model for Wildlife Management." That model, according to the draft document, includes four key principles. AEP describes them as:

1. Wildlife are a public trust
2. Wildlife policy, management, and regulations should be based on science
3. Wildlife should be regulated and allocated through enforceable laws
4. Wildlife are an international resource

AWA is concerned that, in the draft document, AEP has misidentified the North American Model. It isn't the "North American Model of Wildlife Management." It's the "North American Model of Wildlife Conservation". Why hasn't AEP accurately referred to the Model of Wildlife Conservation? Alberta history illustrates well that there can be a profound difference between managing wildlife and conserving wildlife. Strychnine was used on the prairies to manage wolves with a view to their extirpation, not their conservation.

If AEP intends to follow the North American Model of Wildlife Conservation, then we would like the model to be identified accurately.

Further to this objection, why did AEP suggest that there are only four key principles in the North American Model of Wildlife Conservation? There are seven principles and the Association of Fish and Wildlife Agencies describes them as interdependent. Why did AEP not list versions of the three other principles that are part of this Model of Wildlife Conservation: “commerce in dead wildlife is eliminated; wildlife may only be killed for a legitimate, non-frivolous purpose; every person has an equal opportunity under the law to participate in hunting and fishing.” Since AEP’s survey invites respondents to comment on their satisfaction about their ability to access Crown lands I would think the third of these omitted principles is especially relevant to the vision document.

Based on the seven principles found in the North American Model of Wildlife Conservation, AWA believes wildlife management in Alberta may be improved. First, the current *Wildlife Act* continues to classify species as game and non-game species, whose management is based primarily as a consumptive resource. This is inappropriate because many Albertans do not consume wildlife, and value wildlife species for their intrinsic worth on the landscape. A much-needed reform of the *Wildlife Act* should manage wildlife for conservation purposes first, then for Indigenous rights, and lastly for recreational hunting purposes. These priorities should be clearly ranked in the *Wildlife Act* in terms of importance. Recreational hunting should be permitted where scientific evidence suggests that it is sustainable, meaning that the populations of game species are maintained at a biologically and ecologically acceptable level with hunting. This requires that wildlife populations are monitored effectively and frequently enough to detect population changes. Adequate population monitoring is particularly important given the extent of habitat disturbance by human development and industry.

Another flaw with the current *Wildlife Act* is that most aspects of species-at-risk management are up to the discretion of the Minister of Environment and Parks. This includes the designation of species as endangered, threatened, or special concern. Implementing a stand-alone *Species at Risk Act* in Alberta would be the best way to address these gaps in legislation and ensure the protection of species-at-risk for all Albertans. The provincial *Species at Risk Act* should include definitions of the species-at-risk designations, and identify criteria for listing species. The power to designate species status should fall on scientists, not the Minister. Additionally, timelines for listing decisions and mandatory recovery plans should be written in the legislation to ensure accountability. A legal definition of ‘habitat’ needs to be included, so that critical habitat can be adequately identified and protected. Mandatory recovery plans should require the identification and protection of critical habitat. There should be specific prohibition against killing an individual of an endangered species, or removing them from their habitat. If species-at-risk are to be adequately protected, these measures need to be written into legislation, rather than addressed in policy.

The online survey for the draft asks whether the respondent is satisfied with the accessibility of public lands. AWA is extremely dissatisfied with the way that public lands are managed. Under the Recreational Access Regulation, lease holders have the power to determine whether the public have access to public

lands under government leases. This often excludes Albertans from accessing Crown land, and discourages the public from recreating outdoors. With respect to recreational hunting, access to Crown lands is a longstanding problem where too many grazing leaseholders unreasonably deny hunters and other recreational users access to the Crown lands they are privileged to lease. One principle of the North American Model for Wildlife Conservation states that “every person has an equal opportunity under the law to participate in hunting and fishing”. The behavior of some leaseholders undermines the realization of this principle on public lands. This sometimes allows resource exploitation to eclipse recreation opportunities and interfere with the public’s right to roam.

Finally, the draft indicates an interest in implementing “innovative tools to provide improved recreational hunting on public and private lands”. AWA would like to stress our continued opposition to what the Alberta Elk Commission refers to as “cervid harvesting preserves,” also known as hunt farms. Shooting animals that are constrained by artificial barriers is unethical and contrary to the concept of fair chase. Additionally, wildlife that are kept in game farms are particularly susceptible to diseases because they are kept in close proximity to one another, unlike wild populations. These diseases may be spread to other livestock and wild populations through fences, through flowing streams, or by escaped animals. An example of this is seen with chronic wasting disease (CWD), which was first identified in game farms in Saskatchewan (2001) and Alberta (2002) and is now prevalent in the wild population of deer in these provinces. CWD poses a risk not only to elk and deer, but to other species (such as the threatened woodland caribou) and to people if this disease is able to jump the species barrier to humans, as was the case with the similar disease bovine spongiform encephalopathy (mad cow disease). As such, AWA would like to see all game farms outlawed, and no approval of hunt farms in Alberta.

AWA hopes that this consultation leads to a meaningful reform of wildlife management in Alberta to reflect the values of all Albertans. We look forward to your response, and to hear what changes will be made following this consultation process.

Sincerely,  
ALBERTA WILDERNESS ASSOCIATION



Devon Earl  
Conservation Specialist