



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

November 19, 2024

Hon. Todd Loewen  
Minister of Forestry and Parks  
Government of Alberta  
By e-mail: [FP.Minister@gov.ab.ca](mailto:FP.Minister@gov.ab.ca), [Todd.Loewen@gov.ab.ca](mailto:Todd.Loewen@gov.ab.ca)

Dear Minister Loewen,

Alberta Wilderness Association (AWA) is writing to oppose the recent changes to the *Alberta Guide to Trapping Regulations* that removes limits on trapping of furbearing animals. Not only does this decision risk devastating populations of sensitive furbearing species, the decision was also published after the start of the open season for wolverine and fisher, and should not be valid for the current open season.

Founded in 1965, AWA strives to help Albertans understand the intrinsic values that wildlife and wilderness provide and encourages communities to participate in conservation initiatives that will ensure a legacy for future generations. With over 7,000 members and supporters in Alberta and across Canada, AWA is dedicated to conserving and protecting Alberta's wilderness.

Trapping limits are vital for sustainable management of species. As the *Alberta Guide to Trapping Regulations* states, quota and accurate data "prevents the overharvest of sensitive species of furbearers, ensuring a viable resource for the future." Hunting, particularly through trapping, is a high source of mortality for many species, such as wolverine<sup>1</sup>. Historically, overhunting was a primary cause for the decline of fur-bearing species. For instance, Canada lynx was nearly extirpated from parts of eastern Canada, and only recently have some populations recovered enough that they are no longer considered *Endangered*<sup>2</sup>. Trapping limits were already considered unsustainable for wolverine populations<sup>3</sup>, a species that have been considered vulnerable by IUCN standards since the last population estimate of fewer than 1000 mature individuals<sup>4</sup>. Recent data, available to Alberta Environment and Parks, indicates less than 1000 wolverines are on the landscape now. Fisher

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<sup>1</sup> Barrueto, M., Forshner, A., Whittington, J., Clevenger, A. P., & Musiani, M. (2022). Protection status, human disturbance, snow cover and trapping drive density of a declining wolverine population in the Canadian Rocky Mountains. *Scientific Reports*, 12(1), 17412.

<sup>2</sup> Fowler, Shane. 2023. Canada lynx no longer considered endangered, changes made to N.B. Species at Risk Act. CBC News. Available at: <https://www.cbc.ca/news/canada/new-brunswick/wolves-and-lynx-nb-species-at-risk-act-1.6740027>

<sup>3</sup> Mowat, G., Clevenger, A. P., Kortello, A. D., Hausleitner, D., Barrueto, M., Smit, L., ... & Ott, P. K. (2020). The sustainability of wolverine trapping mortality in southern Canada. *The Journal of Wildlife Management*, 84(2), 213-226.

<sup>4</sup> Alberta Sustainable Resource Development Fish and Wildlife, Alberta Conservation Association. 2003. Alberta's Wolverine (*Gulo gulo*). Available at: <https://open.alberta.ca/dataset/c0bb7ebe-b2a2-4d50-a0d0-bba15ac5c10d/resource/3f9f02ae-6173-4438-ae4e-a3a8f7be02b8/download/sar-wolverine-factsheet-may2003.pdf>

management has already failed to meet reproduction targets that would allow for sustainable harvest<sup>5</sup>. Unlimited trapping could cause these species to disappear entirely from Alberta.

In addition, based on Alberta's Wildlife Regulation, "An open season quota referred to in subsection (1) must be established prior to the start of the open season to which the quota applies and made publicly available on a website maintained by the Department" (schedule 15, section 8.7(2)<sup>6</sup>). The *Alberta guide to trapping regulations* was updated November 1, 2024. The open season for wolverine and fisher in the relevant fur management zones is November 1 to January 31<sup>7</sup>. Therefore, the new quota was provided after the start of the hunting season and is not valid for the current trapping season. This puts trappers at risk of trapping without a valid quota.

As such, AWA finds these changes to the trapping regulations unacceptable, as well as not being valid for the current season. We request that you:

- 1. Immediately revise the *Alberta guide to trapping regulations*, and reinstate limitations on furbearing animals.**

As the change failed to meet the deadline for wolverine and fisher open seasons, the removal of limits must immediately be reversed, and the *Alberta guide to trapping regulations* updated. Trappers who follow the new limits are not following a valid quota.

There is no justification for removing these limits. We have sufficient data to show these populations are sensitive to trapping, and there must be limits prevent overharvest and population collapse. The impact of trapping on wolverine populations is well known, with the *2002 Report of Alberta's Endangered Science Conservation Committee* stating, "the trapping of only a few individuals has a large potential to affect negatively the reproductive success of the population, and recovery from any population decline will be slow."<sup>8</sup> Contrary to your claims, there is no need for additional information, as recent populations estimates have been conducted and indicate populations are at less than 1000 total

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<sup>5</sup> Government of Alberta. 2024. Alberta Guide to Trapping Regulations 2024-2025 [Updated November 2024]. Available at: <https://open.alberta.ca/dataset/8ccfe254-37d4-42fd-a8ec-fc08fa2fe687/resource/30f3b7d9-ff2e-403b-aeef-7501e6eafb90/download/fp-alberta-trapping-regulations-2024-2025-updated-2024-11.pdf>

<sup>6</sup> Alberta Regulation 143/97, Wildlife Act, Wildlife Regulation. Available at: <https://www.canlii.org/en/ab/laws/regu/alta-reg-143-1997/221198/alta-reg-143-1997.html>

<sup>7</sup> Government of Alberta. 2024. Alberta Guide to Trapping Regulations 2024-2025 [Updated November 2024]. Available at: <https://open.alberta.ca/dataset/8ccfe254-37d4-42fd-a8ec-fc08fa2fe687/resource/30f3b7d9-ff2e-403b-aeef-7501e6eafb90/download/fp-alberta-trapping-regulations-2024-2025-updated-2024-11.pdf>

<sup>8</sup> Fish and Wildlife Division. 2004. Report of Alberta's Endangered Species Conservation Committee: June 2002. Available at: <https://open.alberta.ca/dataset/30bac572-48d4-47b8-ad62-4d7b78e7ef5b/resource/3050f544-1ac2-47de-a9d5-c443ab7fcfa1/download/2002-sar-albertaesccreport-jun2002.pdf>

individuals in Alberta, below International Union for the Conservation of Nature (IUCN) standards<sup>9</sup>. These populations are declining<sup>10</sup>, and trapping is one of the main causes of this decline<sup>11</sup>.

The limits should also be reinstated for all affected species. Sustainable harvest allows for the harvest of resources, including hunting or trapping of animals, without reducing the population over time. In order to sustainably manage a resource, there must be limits on harvest, and these limits must be based on accurate data to ensure harvest does not lead to a reduction in the population and long-term viability of the species. Historically, overexploitation has been one of the greatest threats to species survival<sup>12</sup>, and remains a sizable threat to biodiversity in Canada<sup>13</sup>. The decline of Canada lynx<sup>14</sup> and river otter<sup>15</sup>, among other species, has been attributed to overharvest, and their recent recovery was only possible by imposing harvest limits and regulations. The government of Canada previously reported that “Intense trapping can remove most lynxes from a given area.<sup>16</sup>” The Ungava grizzly population that once ranged across northern Quebec and Labrador is now extinct, in part due to fur trapping<sup>17</sup>. Allowing unregulated trapping of furbearing animals will likely result in a similar outcome for the populations in Alberta; we will lose these populations entirely from the Alberta landscape.

## **2. Make a public statement about the mistake and reinstatement of limitations, and take appropriate steps to notify trappers.**

Once the quotas are corrected, you must immediately make public the change, and take steps to notify trappers. Due to the confusion around the removal of limitations and the lack of validity of the currently advertised limits, trappers are at risk of violating trapping limits and harvesting more animals than allowed. To ensure the correct quotas are known, there must be a public announcement, and all possible effort should be made to inform trappers of this change as quickly as possible.

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<sup>9</sup> IUCN. 2001. IUCN Red List Categories and Criteria Version 3.1. Available at:

<https://portals.iucn.org/library/sites/library/files/documents/RL-2001-001.pdf>

<sup>10</sup> Barrueto, M., Forshner, A., Whittington, J., Clevenger, A. P., & Musiani, M. (2022). Protection status, human disturbance, snow cover and trapping drive density of a declining wolverine population in the Canadian Rocky Mountains. *Scientific Reports*, 12(1), 17412.

<sup>11</sup> Krebs, J., Lofroth, E., Copeland, J., Banci, V., Cooley, D., Golden, H., ... & Shults, B. (2004). Synthesis of survival rates and causes of mortality in North American wolverines. *The Journal of Wildlife Management*, 68(3), 493-502.

<sup>12</sup> What causes extinction? [n.d.] American Museum of Natural History. Retrieved November 8, 2024 from:

<https://www.amnh.org/explore/ology/biodiversity/going-going-gone/what-causes-extinction>; Why some species become at risk. 2014. Government of Canada. Available at: <https://www.canada.ca/en/environment-climate-change/services/species-risk-education-centre/why-some-species-become-at-risk.html>

<sup>13</sup> Venter, O., Brodeur, N. N., Nemiroff, L., Belland, B., Dolinsek, I. J., & Grant, J. W. (2006). Threats to endangered species in Canada. *Bioscience*, 56(11), 903-910.

<sup>14</sup> de Vos, A., & Matel, S. E. (1952). The status of the lynx in Canada, 1920-1952. *Journal of Forestry*, 50(10), 742-745.

<sup>15</sup> North American river otter: non-detriment finding. 2014. Government of Canada. Retrieved November 8, 2024 from:

<https://www.canada.ca/en/environment-climate-change/services/convention-international-trade-endangered-species/non-detriment-findings/north-american-river-otter.html>

<sup>16</sup> Canada Lynx. 1992. Government of Canada. Available at:

[https://publications.gc.ca/collections/collection\\_2017/eccc/CW69-4-59-1992-eng.pdf](https://publications.gc.ca/collections/collection_2017/eccc/CW69-4-59-1992-eng.pdf)

<sup>17</sup> Hamilton, R. (2001). *The Grizzly Almanac: A Fully Illustrated Natural and Cultural History of America's Great Bear*.

**3. Provide documentation of any consultations leading to these changes.**

AWA understands consultation with Alberta Trappers Association occurred that led to the lifting of trapping limits for wolverine, fisher, river otter and Canada lynx. We are requesting that documentation of these consultations be released, with information on meeting dates, topics addressed, and any promises made during the consultation process. We also request any additional consultations be shared.

**4. Set trapping quotas for wolverine, fisher, river otter and Canada lynx populations based on scientific evidence and provide this evidence. If evidence is based on trapping records, explain how these records accurately describe species populations.**

Accurate data is vital to successfully managing these populations. For some populations, such as wolverine, data is not sufficient to understand the impact of trapping on the species. As such, we would recommend that all trapping be paused until such data is available to confidently determine harvest quota. At minimum, quotas should be reduced, based on evidence that trapping of this species was already unsustainable<sup>18</sup>. This data should be collected following rigorous scientific practices, to reduce uncertainty.

Trapping should be managed based on this data – it should not be used for data collection. Unlimited trapping for the sake of data collection risks causing population extinction, and there are more effective and less destructive methods (fur/scat collection, remote audio/video sensors, capture and release, eDNA sampling, etc.) for gathering the required data. The accuracy of basing population estimates on trapping data is also in question, particularly as destructive sampling, like trapping, impacts the observed populations. As well, the fur and trapping industries received nearly \$11.5 million in payments and \$9.2 million in grants and subsidies between 2015 and 2019 from the federal government<sup>19</sup>. If these resources were redirected to academic research, we could more quickly and safely obtain vital information on our furbearing populations, without risking species loss.

**5. Seek public consultation and expert opinions, and publicly announce all future changes to hunting or trapping regulations.**

The management of our wildlife affects all Albertans. In Alberta, as in other provinces, wildlife are considered a public resource. They are not owned by any particular group and should be available to be enjoyed by all. As such, changes to how wildlife are managed must be open to public consultation, and the general public must be made aware of any changes that could impact wildlife populations. This

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<sup>18</sup> Mowat, G., Clevenger, A. P., Kortello, A. D., Hausleitner, D., Barrueto, M., Smit, L., ... & Ott, P. K. (2020). The sustainability of wolverine trapping mortality in southern Canada. *The Journal of Wildlife Management*, 84(2), 213-226.

<sup>19</sup> Data from Detailed information on Transfer Payments, as per the Public Accounts of Canada. 2020. Government of Canada. Available at: <https://open.canada.ca/data/en/dataset/69bdc3eb-e919-4854-bc52-a435a3e19092#wb-auto-6>

change was made without public consultation or the input of experts and researchers. It should also follow due process, and the decision must be published.

The role of a Minister is to “develop policies and programs that best serve Albertans<sup>20</sup>.” You are responsible for representing the best interests of all Albertans, not only a small group that would benefit from this change. Until a clear and open public engagement process has been initiated that distinctly shows these changes are in the best interests of Albertans, and unless all applicable processes are followed, they must be retracted, and the harvest limits reinstated.

Your message in the *Alberta Guide to Trapping Regulations 2024-2025* concludes, “Alberta’s government continues to ensure that trapping remains a valued tradition in the province for years to come.” Removing limitation on trapping violates that promise and all principles of sustainable management, and could devastate the sensitive fisher, river otter, Canada lynx and wolverine populations. There will not be a future for trapping if these furbearing species disappear from the landscape.

We look forward to your timely response, and to your appropriate decision that acts in the best interests of all Albertans.

Sincerely,  
ALBERTA WILDERNESS ASSOCIATION



Ruiping Luo  
Conservation Specialist

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<sup>20</sup> The Role of a Member. [n.d.] Legislative Assembly of Alberta. Retrieved November 8, 2024 from: <https://www.assembly.ab.ca/learn/the-legislative-assembly/roles/the-role-of-a-member>