



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

Ministry of Agriculture and Irrigation
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Edmonton, Alberta T6H 5T6
By email: AGI.OCPVpolicy@gov.ab.ca

January 24, 2025

Re: AWA Feedback on the Proposed Changes to the Livestock Industry Diversification Act

Alberta Wilderness Association (AWA) is writing to provide feedback on the proposed changes to the Livestock Industry Diversification Act (LIDA) and Regulations. Founded in 1965, AWA is the oldest Alberta-based environmental conservation group with more than 7,500 members and supporters in Alberta and around the world. AWA seeks the completion of a protected areas network and good stewardship of Alberta's public lands, water and biodiversity to ensure future generations enjoy the abundance benefits they provide.

The Ministry of Agriculture and Irrigation is proposing legislative changes to permit the establishment of Harvest Preserves in Alberta. This proposal involves removing the prohibition on hunting from the LIDA and amending the Domestic Cervid Industry Regulation. These changes also include the creation of a specific license designation for Harvest Preserves. While the CWD Surveillance Program is expected to continue, the proposed changes would allow animals to be transported from cervid farms in southern Alberta to Harvest Preserves located throughout the province. Restrictions on movement would reportedly apply to animals from farms known to have tested positive for CWD, but concerns remain about the risks posed to wildlife and public health.

AWA strongly opposes the proposal to legalize Harvest Preserves. Chronic Wasting Disease (CWD) is a prion disease that affects cervids such as deer, elk, moose and reindeer. Alberta's first CWD case was diagnosed in farmed elk in 2002, and by 2005, the disease had spread to wild cervids. Since 2005, a total of 6,163 wild deer, elk, and moose in the province have been reported to have CWD.¹

This disease is primarily transmitted through infectious bodily fluids like saliva, urine, and feces, and once prions are introduced into the environment, they can persist for years in water, soil, and

¹ Government of Alberta. (2024, October 7). Chronic Wasting Disease – Updates. <https://www.alberta.ca/chronic-wasting-disease-updates>.

vegetation^{2,3}. Research shows that prions can even bind to plants, remaining infectious and capable of being transported⁴.

CWD transmission increases when cervids congregate or come into contact with contaminated environments. Known risk factors, such as baiting or feeding that encourages aggregation, improper carcass disposal, and the movement of live cervids or carcasses, exacerbate the spread. For instance, the movement of infected live cervids has been directly implicated in CWD's introduction to South Korea and its proliferation among North American deer and elk farms^{5,6}.

The proposed Harvest Preserves would involve transporting animals from endemic to non-endemic areas of Alberta, creating a significant risk of further spreading CWD. Even animals from farms without reported CWD cases cannot be guaranteed disease-free, as prions can be transmitted through environmental contamination, including feed, water, and soil⁷. This risk is particularly concerning for Alberta's gregarious cervid species, which are highly susceptible to disease transmission due to their social behavior.

Of particular concern are caribou populations, which are already in decline and listed as Threatened under Alberta's Wildlife Act. If CWD were introduced to northern regions via transported elk or deer, the potential exposure to caribou populations could push this species closer to extirpation. Thus, AWA believes the proposed changes, represent an unacceptable risk to Alberta's wildlife, particularly its most vulnerable species.

The movement of animals has frequently contributed to the spread of diseases, and CWD exemplifies how rapidly diseases can affect multiple species across landscapes. In an era marked by emerging diseases and pandemics, the potential catastrophic consequences of such actions on wildlife and human health must not be underestimated.

Wildlife diseases are a growing global concern, with Indigenous peoples disproportionately impacted due to their reliance on wild meat for sustenance and cultural practices. In Western Canada, cervids such as moose, white-tailed deer, and mule deer are essential food sources for Indigenous communities. However, these species are all susceptible to CWD. Moving animals from endemic CWD areas into regions currently free of the disease poses an unacceptable risk to the health of wild populations and the food security of Indigenous peoples.

² Bartelt-Hunt, S. L., & Bartz, J. C. (2013). Behavior of Prions in the Environment: Implications for Prion Biology. *PLoS ONE*, 9(2). <https://doi.org/10.1371/journal>

³ Georgsson, G., Sigurdarson, S., & Brown, P. (2006). Infectious agent of sheep scrapie may persist in the environment for at least 16 years. *Journal of General Virology*, 87(12), 3737–3740. <https://doi.org/10.1099/vir.0.82011-0>

⁴ Pritzkow, S., Morales, R., Moda, F., Khan, U., Telling, G. C., Hoover, E., & Soto, C. (2015). Grass Plants Bind, Retain, Uptake, and Transport Infectious Prions. *Cell Reports*, 11(8), 1168–1175. <https://doi.org/10.1016/j.celrep.2015.04.036>

⁵ Gillin, C., Cornicelli, L., Drew, M., Fischer, J., Mawdsley, J., Straka, K., Wild, M., Boswell, R., Munk, B., Pybus, M., Fish, A., & Jennifer Ramsey, W. (2018). AFWA Technical Report on Best Management Practices for Surveillance, Management and Control of Chronic Wasting Disease. Association of Fish and Wildlife Agencies.

⁶ Osterholm, M. T., Anderson, C. J., Zabel, M. D., Scheftel, J. M., Moore, K. A., & Appleby, B. S. (2019). Chronic wasting disease in cervids: Implications for prion transmission to humans and other animal species. *MBio*, 10(4). <https://doi.org/10.1128/mBio.01091-19>

⁷ Zabel, M., & Ortega, A. (2017). The Ecology of Prions. *Microbiology and Molecular Biology Reviews*, 81(3). <https://doi.org/10.1128/mnbr.00001-17>

Harvesting rights for First Nations and Métis peoples in Alberta are protected under the Canadian Constitution, historic treaties, and Supreme Court case law. The federal government strongly advises against consuming animals infected with CWD. Therefore, the potential spread of CWD into non-endemic areas threatens not just wildlife management but also Indigenous food security, health, and cultural continuity.

Studies have shown that Indigenous peoples in Alberta are deeply motivated to harvest ungulates for food but are increasingly concerned about the risks posed by CWD. Introducing or exacerbating CWD in regions where Indigenous communities rely on wildlife could have devastating and long-lasting consequences^{8,9}. Historically, Indigenous rights to lands, resources, and wildlife harvesting have often been overlooked. Recognizing and respecting these rights, as well as integrating Indigenous knowledge, are essential for advancing collaborative and effective approaches to monitoring and managing the growing threat of CWD and other wildlife diseases.

If Harvest Preserves are to proceed, the government must engage Indigenous communities as equal partners in consultation, monitoring, and management processes. Failing to address these concerns risks irreparable damage to Indigenous food security, cultural practices, and the health of Alberta's wildlife ecosystems.

The risks of spreading CWD to non-endemic areas would also significantly impact recreational hunters who rely on wild cervid populations. The potential devastation of wild populations could reduce hunting opportunities outside of Harvest Preserves, further eroding the principle of "fair chase," which is central to ethical hunting. Harvest Preserves, as proposed, closely resemble "canned hunting," transforming wildlife hunting into a controlled, commercialized activity that undermines traditional hunting practices.

Additionally, concentrated populations of farmed elk and deer could exacerbate conflicts with natural predators, such as wolves, which may be drawn to these preserves. Management of wolf-livestock conflicts often results in culling wolves, a measure that is rarely effective and disrupts the balance of ecosystems¹⁰.

Escape of farmed animals into the wild also represents serious risks. Besides the potential for these animals to introduce diseases to wild populations, they could also interbreed with them, leading to genetic concerns and potentially compromising the genetic integrity of Alberta's wildlife.¹¹

Due to the concerns listed above, AWA urges the Government of Alberta to reconsider the proposed legalization of Harvest Preserves. The significant risks posed by CWD, the ethical and ecological

⁸ Parlee, B., Ahkimmachie, K., Cunningham, H., Jordan, M., & Goddard, E. (2021). "It's important to know about this" - risk communication and the impacts of chronic wasting disease on indigenous food systems in Western Canada. *Environmental Science and Policy*, 123, 190–201. <https://doi.org/10.1016/j.envsci.2021.05.012>

⁹ Otipemisiwak Métis Government. (2022, May 6). Chronic wasting disease & caribou conservation. [https://Albertametis.Com/Programs-Services/Environment-Climate/Chronic-Wasting-Disease-Caribouconservation/#:~:Text=Chronic%20Wasting%20Disease%20\(CWD\)%20is,Fragile%20caribou%20population%20in%20Alberta](https://Albertametis.Com/Programs-Services/Environment-Climate/Chronic-Wasting-Disease-Caribouconservation/#:~:Text=Chronic%20Wasting%20Disease%20(CWD)%20is,Fragile%20caribou%20population%20in%20Alberta).

¹⁰ DeCesare, N. J., Wilson, S. M., Bradley, E. H., Gude, J. A., Inman, R. M., Lance, N. J., Laudon, K., Nelson, A. A., Ross, M. S., & Smucker, T. D. (2018). Wolf-livestock conflict and the effects of wolf management. *Journal of Wildlife Management*, 82(4), 711–722. <https://doi.org/10.1002/jwmg.21419>

¹¹ Champagnon, J., ElMBERG, J., Guillemain, M., Gauthier-Clerc, M., & Lebreton, J. D. (2012). Conspecifics can be aliens too: A review of effects of restocking practices in vertebrates. In *Journal for Nature Conservation* (Vol. 20, Issue 4, pp. 231–241). <https://doi.org/10.1016/j.jnc.2012.02.002>

concerns, and the potential impacts on Indigenous peoples and other stakeholders make this proposal untenable. Alberta must prioritize the health of its wildlife, ecosystems, and communities over short-term economic incentives.

AWA is grateful for the opportunity to provide feedback in this process. If you have any questions or require clarification, please don't hesitate to contact us by email or phone.

Sincerely,

ALBERTA WILDERNESS ASSOCIATION

A handwritten signature in black ink, appearing to read 'Pamela R. Narváez-Torres', is positioned above a faint, light-colored circular stamp or watermark.

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