

Appendices I – VI

Supplementary information for the open letter to Todd Loewen, Minister of Forestry and Parks, submitted by Alberta Wilderness Association and the Exposed Wildlife Conservancy on May 5, 2025.

Contents

Appendix I: Cougars	1
Appendix II: Grizzly Bears.....	7
Appendix III: Furbearers.....	11
Appendix IV: Mountain Goats, Bighorn Sheep and other species.....	22
Appendix V: News Releases and Timelines.....	26
Appendix VI: Conflict of Interest	28

Note: Biologists were approached for their expertise relevant to each section. They were asked to review the information presented and provide a statement. They are not responsible for the contents of the associated letter.

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Appendix I: Cougars

Changes to Cougar Quotas and Management Areas

- March 26, 2024: Female quotas are more than doubled¹.
- March 28, 2024: Ministerial Order 37/2024 establishes new Cougar Management Areas 33-38 and removes the requirement to establish open season quotas before December 1². These new management areas include the relatively isolated subpopulations in Cypress Hills.
- November 18, 2024: A provincial directive allows off-leash hunting dogs in provincial parks to hunt cougars³. Previously, all pets were required to be leashed or caged at all times in provincial parks.
- December 1, 2024: Cougar hunting quotas are set to non-zero numbers in new Cougar Management Areas.

Minister Loewen's Public Statements

- To the press, Minister Loewen has said the cougar population in the province is expanding and has reached 2,000 cougars, and the Cougar Management Plan indicates we want a healthy population of about 1,500 cougars⁴.
- He has further stated that the acceptable harvest rate is 20 percent, and current human-caused mortality rates are about 11 per cent of the total population⁵.
- Minister Loewen has said that there have been increasing negative interactions between humans and cougars, and that increasing harvest will decrease human-cougar conflict⁶.
- In response to a letter from AWA inquiring about the increased female cougar quotas, Minister Loewen wrote: "Provincial cougar management objectives aim to

¹Government of Alberta. March 26, 2024. 2023-2024 quotas : male and female cougars. Retrieved March 14, 2025, from: <https://open.alberta.ca/publications/quotas-for-cougars>.

² Government of Alberta. March 28, 2024. Ministerial Order 37/2024. Retrieved March 14, 2025, from: https://kings-printer.alberta.ca/Documents/MinOrders/2024/Forestry_and_Parks/2024_037_Forestry_and_Parks.pdf.

³ Government of Alberta. November 18, 2024. Provincial parks general directive. Retrieved March 19, 2025, from: <https://open.alberta.ca/publications/provincial-parks-general-directive>.

⁴ Jack Farell, The Canadian Press. December 4, 2024.

'We do need to harvest': Alberta government expands cougar hunting areas, quotas. Retrieved March 14, 2025, from: <https://calgary.citynews.ca/2024/12/04/alberta-cougar-hunting/>.

⁵ Mia Parker, Shooting the Breeze. June 18, 2024. Conservation specialist highlights concerns on increased cougar quotas. Retrieved March 14, 2025, from: <https://shootinthebreeze.ca/alberta-cougar-hunting-quotas-pincher-creek-crowsnest-pass-news/>.

⁶ Todd Loewen, post on Facebook. February 14, 2024. Retrieved March 14, 2025, from: https://www.facebook.com/ToddLoewenAB/photos/theres-been-some-recent-talk-about-cougar-hunting-in-the-bow-valley-and-id-like-/1025046906105043/?_rdr.

maintain healthy populations, reduce human cougar conflicts and provide recreational hunting opportunities... However, some stakeholders believe cougar numbers are unacceptably high, resulting in unwanted predation on caribou, bighorn sheep, and other big game species.⁷”

Rebuttal: Cougar Management Science

- In 2019, the cougar population was estimated at 1,559 total individuals (adults and immature)⁸, and the 2022 update agreed with these numbers⁹. This is precariously close to the minimum viable population of 1,500 individuals set in the Cougar Management Plan¹⁰. This population count is considered more accurate than the 2,050 cougars estimated in 2012¹⁰. There has been no evidence provided by the Minister or Alberta Fish and Wildlife to indicate cougar populations are expanding or that populations are excessively high. In fact, quotas were reduced in 2022 to maintain a sustainable harvest rate and to reduce conflict⁹.
- The Cougar Management Plan sets 20 percent as a maximum for all human-caused mortality. The target harvest rate is 14 to 16 percent of estimated adult population, to match average annual growth rate and allow for a stable population structure⁹. The adult cougar population was estimated at 795 individuals in 2019, so an appropriate quota would be roughly 111 to 127 cougars. The 2024-25 quota of 133 cougars¹¹, not including guide-outfitter allocations of another 50 cougars, already exceeds the target.
- Cougar mortality data shows there have been fewer problem cougars killed in recent years, and there is no evidence to support the claim that human-cougar conflicts were increasing before 2024, when quotas were changed (see Fig. 1 below). In 2024, the year quotas were increased, problem cougar mortality increased for the first time in 5 years. Studies agree that hunting generally increases human-cougar

⁷ Todd Loewen, Alberta Forestry and Parks. May 7, 2024. Response from Minister on cougar hunting quotas. Retrieved March 14, 2024, from: <https://albertawilderness.ca/response-from-minister-on-cougar-hunting-quotas/>.

⁸ Government of Alberta. December 2019. 2019 Winter Cougar Season Quota Updates. Retrieved March 14, 2025, from: <https://open.alberta.ca/publications/winter-cougar-season-quota-updates>.

⁹ Government of Alberta. December 9, 2022. 2022 Winter Cougar Season Quota Updates. Retrieved March 19, 2025, from: <https://open.alberta.ca/publications/winter-cougar-season-quota-updates>.

¹⁰ Government of Alberta. November 2012. Management Plan for Cougars in Alberta. Retrieved March 14, 2025, from: <https://open.alberta.ca/publications/9781460113189>.

¹¹ Government of Alberta. December 1, 2025. 2024-2025 quotas : male and female cougars. Retrieved March 14, 2025, from: <https://open.alberta.ca/publications/quotas-for-cougars>.

conflicts^{12,13}. This trend is also seen in Alberta, where years with high human-caused cougar mortality have also resulted in higher numbers of problem cougars (Fig. 2). Science has shown that cougar hunting is not a successful strategy to reduce human-cougar conflicts, and often causes increased conflicts.

- Increased cougar harvest also does not necessarily enhance ungulate populations, such as sheep, goats, deer and caribou. The benefit to ungulates will depend on the situation, so population-level predator control, such as removal of cougars, may not always produce the desired outcome of increasing ungulate numbers¹⁴.
- Minister Loewen has not disclosed the stakeholders that expressed concerns over unacceptably high cougar numbers, nor provided evidence that shows excessive cougar population numbers in the province. He has also failed to prove that current management strategies are sustainable. His letter response to AWA indicates a clear interest in maintaining recreational hunting and preventing predation of ungulate game species, to the detriment of predator species such as cougars.

¹² Teichman, K. J., Cristescu, B., & Darimont, C. T. (2016). Hunting as a management tool? Cougar-human conflict is positively related to trophy hunting. *BMC ecology*, 16, 1-8.

¹³ Laundré, J. W., & Papouchis, C. (2020). The Elephant in the room: What can we learn from California regarding the use of sport hunting of pumas (*Puma concolor*) as a management tool? *PLoS One*, 15(2), e0224638.

¹⁴ Knopff, K. H., Knopff, A. A., Kortello, A., & Boyce, M. S. (2010). Cougar kill rate and prey composition in a multiprey system. *The Journal of Wildlife Management*, 74(7), 1435-1447.

Statement by Martin Jalkotzy:

Recent changes to cougar management in Alberta instituted by Minister Loewen are not supported by Alberta's existing cougar management framework or current scientific information. Changes appear to be driven by anecdotal information from stakeholders with vested interests in hunting both cougars and their prey, all of which are contrary to accepted scientific information currently available. The changes have the potential to reduce Alberta's cougar population, contrary to the cougar management plan's stated objective to maintain a stable population of at least 1,500 cougars.

Martin Jalkotzy is a retired Wildlife Biologist, and was a researcher on the Sheep River Cougar Project, the most extensive and long-running study of cougars in Canada. He contributed to an early draft of Alberta's cougar management plan.

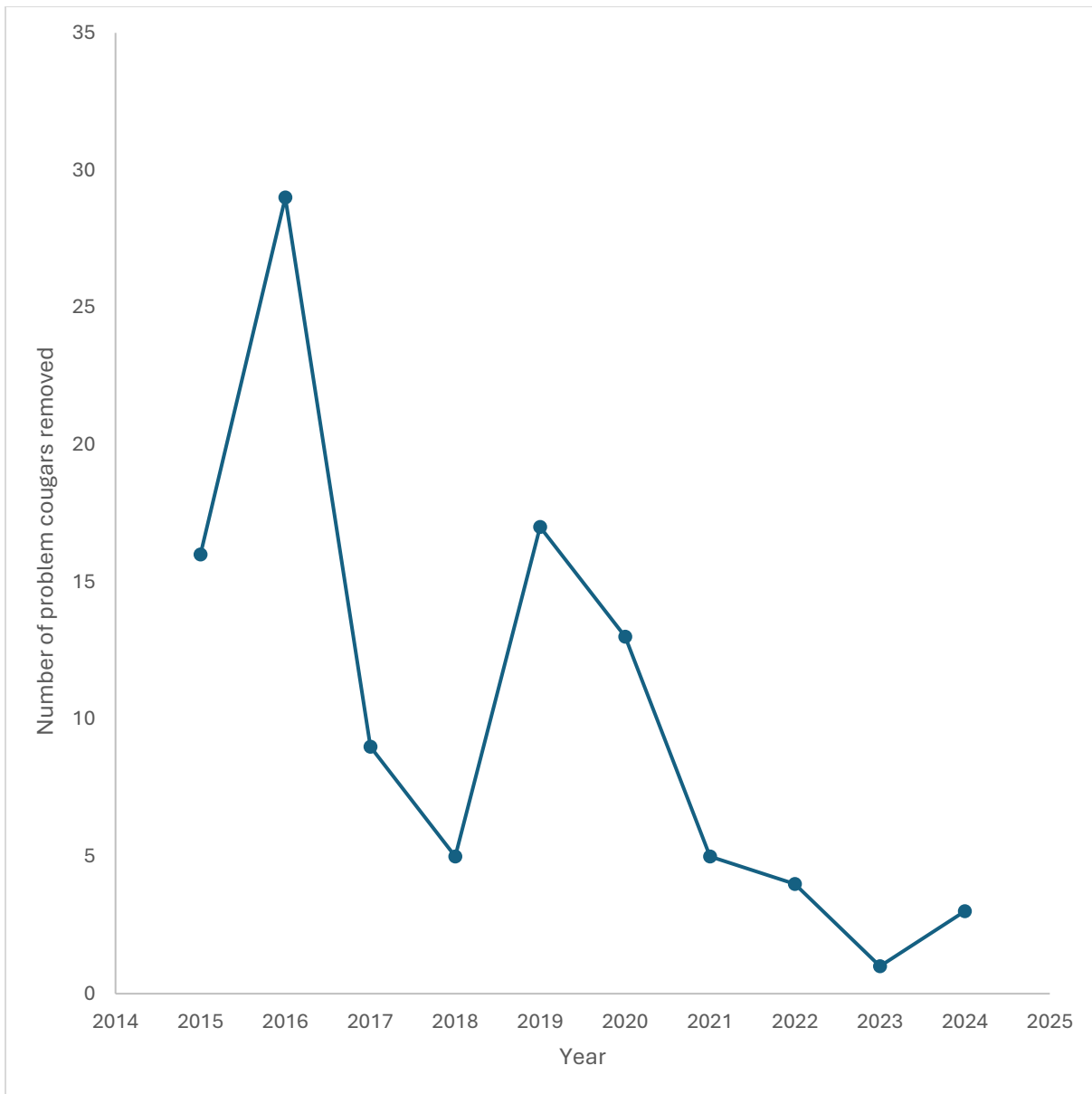


Figure 1. Number of problem cougars removed each year from 2015 to 2024. Data retrieved from Government of Alberta (Cougar mortality in Alberta: <https://open.alberta.ca/publications/cougar-mortality-in-alberta>).

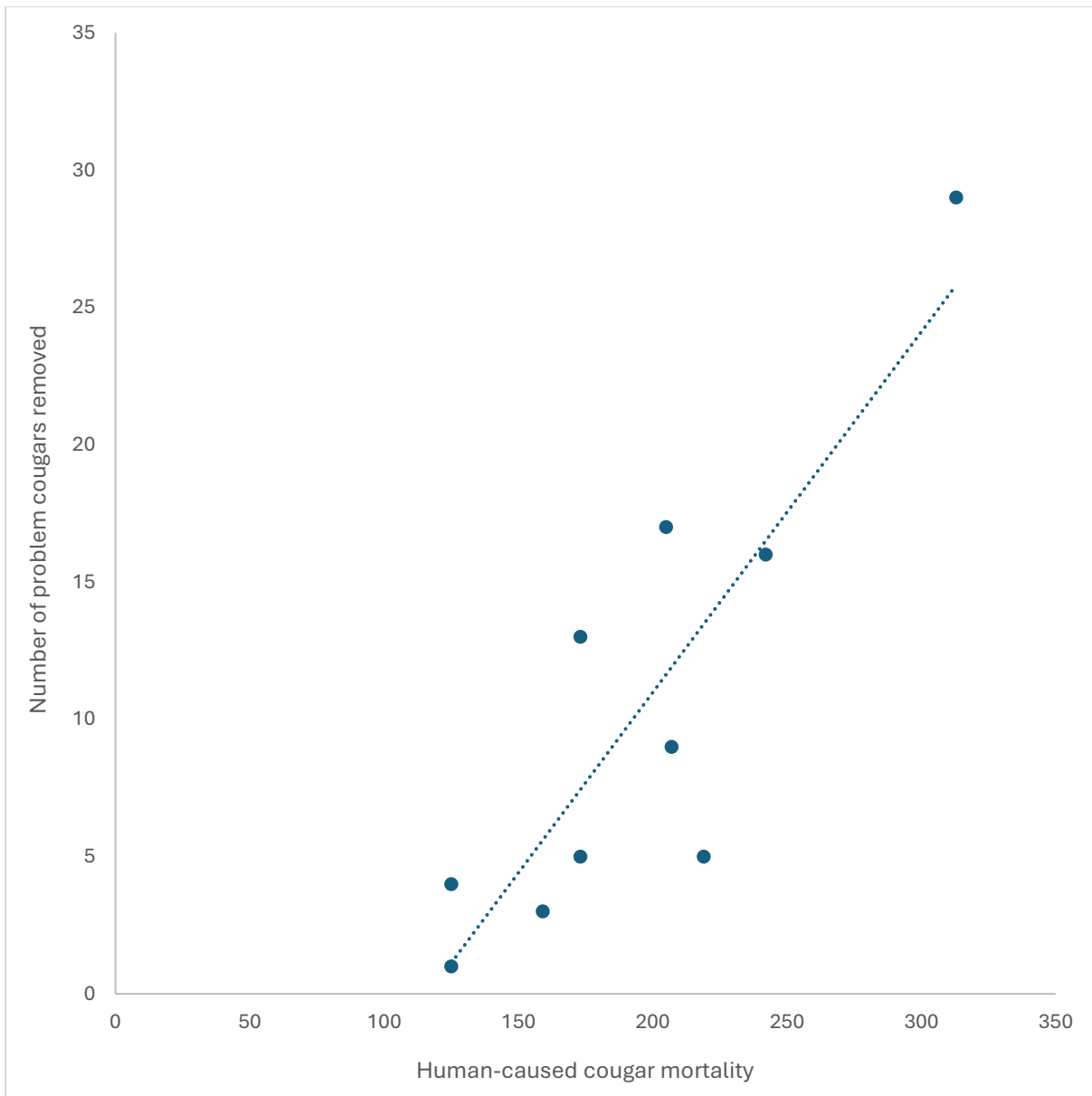


Figure 2. Number of problem cougars removed, and number of cougar mortalities as a result of purposeful human causes (hunting, trapping, landowner removals) in the corresponding year across Alberta. Problem cougars increased significantly with human-caused mortality (linear regression, $t=4.84$, $p=0.0013$; statistical analysis conducted in R 4.3.1). Data retrieved from Government of Alberta (Cougar mortality in Alberta: <https://open.alberta.ca/publications/cougar-mortality-in-alberta>).

Appendix II: Grizzly Bears

Changing the Wildlife Act to allow Grizzly Bear Hunting

- June 17, 2024: Ministerial Order 43/2024 authorized hunting of grizzly bears “involved in a human-bear conflict situation” or “in an area of concern” to be hunted¹⁵. There was no clear definition for area of concern.

Minister Loewen’s Public Statements

- The Government of Alberta News Release on this change states that grizzly bear populations have increased from 800 to more than 1,150¹⁶.
- The news release also listed 3 attacks in 2020, 9 attacks by grizzly and black bears in 2021, and 104 attacks from 2000 to 2021¹⁶.
- Minister Loewen has stated that about 20 grizzlies are killed each year from negative human interactions¹⁷.
- Responding to AWA’s letter requesting justification for allowing grizzly bear hunting by members of the public, the Minister wrote: “As the grizzly bear population continues to grow and they expand their territory throughout our province, human-grizzly conflicts have increased in both frequency and severity¹⁸.”

Rebuttal: Grizzly Management Science

- In 2010, Alberta’s grizzly bear population was an estimated 691 individuals¹⁹. In 2021, the government reported a population of 865 to 973 bears²⁰ based on studies conducted from 2004 to 2018 and calculated for approximately 2016 (reported in the *Addendum to the Alberta Grizzly Bear Recovery Plan*²¹). These numbers were

¹⁵ Government of Alberta. June 17, 2024. Ministerial Order 43/2024. Retrieved March 14, 2025, from: https://kings-printer.alberta.ca/Documents/MinOrders/2024/Forestry_and_Parks/2024_043_Forestry_and_Parks.pdf.

¹⁶ Government of Alberta. July 9, 2024. Protection of life and property from problem wildlife. Retrieved March 14, 2025, from: <https://www.alberta.ca/release.cfm?xID=90627FA92D516-F852-9BAF-A462F6C3D44224AC>.

¹⁷ Jessica Lee, Local Journalism Initiative Reporter. July 18, 2024. Retrieved March 14, 2025, from: <https://www.fitzhugh.ca/local-news/alberta-grizzly-bear-killing-policy-under-fire-9237825>.

¹⁸ Todd Loewen, Alberta Forestry and Parks. November 7, 2024. Retrieved March 14, 2025, from: <https://albertawilderness.ca/89574-2/>.

¹⁹ Government of Alberta. March 1, 2010. Status of the grizzly bear (*Ursus arctos*) in Alberta : update 2010. Retrieved March 14, 2025, from: <https://open.alberta.ca/publications/4470165>.

²⁰ Government of Alberta. March 31, 2021. Pawsitive news about grizzly bear populations. Retrieved March 14, 2025, from: <https://www.alberta.ca/release.cfm?xID=778465CFEAFEE-DBC1-0F0D-FBFCED0FC96F0C2E>.

²¹ Government of Alberta. February 2021. Addendum to the Alberta Grizzly Bear Recovery Plan. Retrieved April 10, 2025 from: <https://open.alberta.ca/dataset/f1066246-d998-42c5-8d19-1682764398d7/resource/df320401-58ca-4a2d-9b3c-7a358c600ebe/download/aep-addendum-to-alberta-grizzly-bear-recovery-2021.pdf>

based on extensive population surveys and an assumed annual growth rate of 2%²¹. It is not clear how the recent claim of 1150 bears in Alberta was reached. Most of Alberta's DNA-based population estimates are now over a decade old and should be updated through methodical and transparent surveys. The Recovery Plan recommends redoing population estimates every 5 years²². Minister Loewen has not responded to AWA requests to provide information that supports these recent numbers.

- Parks Canada data shows staff responded to 6 grizzly bear attacks between 2010 and 2023, and 4 black bear attacks in national parks in Alberta²³. A study of fatalities in Canada bear attacks found only 8 fatal grizzly bear attacks in the province between 1990 and 2023, and 3 black bear attacks²⁴. These sources cannot provide a complete record for bear attacks in the province, although they indicate a large gap between recorded attacks and the numbers Alberta has provided.
- Of the grizzlies killed due to human action, only an average of 4 per year are deliberate agency removals or “problem bears”²⁵. Bears are also killed from vehicle strikes, in self-defence, and from illegal or accidental kills.
- Grizzly bears were listed as Threatened in 2010. One of the reasons for this designation was “the population was estimated to be less than 1000 mature individuals²².” This designation aligns with International Union for Conservation of Nature (IUCN) standards²⁶. Alberta's mature grizzly population, similar to populations elsewhere, has generally composed roughly half of the total population¹⁹. Gordon Stenhouse, a respected grizzly bear biologist, estimated the total grizzly bear population would need to be over 2,000 to have 1,000 mature individuals, based on 52 to 54 percent of the population as 5-year or older mature individuals.
- The Grizzly Bear Recovery Plan lists a priority to “to resolve human-caused mortality,” by working towards coexistence and reducing conflict²². This includes

²² Government of Alberta. July 1, 2020. Alberta grizzly bear recovery plan. Retrieved March 14, 2025, from: <https://open.alberta.ca/publications/9781460147917>.

²³ Government of Canada. December 9, 2024. Human-wildlife coexistence incidents managed by Parks Canada. Retrieved March 14, 2025, from: <https://open.canada.ca/data/en/dataset/743a0b4a-9e33-4b12-981a-9f9fd3dd1680>.

²⁴ Poirier, AC. April 23, 2024. A comparison of reports of fatal grizzly and black bear attacks in Canada. Retrieved March 14, 2025, from: https://thesis.lakeheadu.ca/bitstream/handle/2453/5326/PoirierA2024b-1a.pdf?sequence=1&isAllowed=y&utm_source=airdrie%20city%20view&utm_campaign=airdrie%20city%20view%3A%20outbound&utm_medium=referral.

²⁵ Government of Alberta. August 26, 2024. Grizzly bear mortality rates in Alberta. Retrieved March 14, 2025, from: <https://open.alberta.ca/publications/grizzly-bear-mortality-rates-in-alberta>.

²⁶ IUCN. March 2024. Guidelines for Using the IUCN Red List Categories and Criteria. Retrieved March 14, 2025, from: <https://portals.iucn.org/library/efiles/documents/PP-003-En.pdf>.

education and outreach, managing food attractants, mitigating effects of motorized access (including roads), aversive conditioning and adjustment of human behaviour. These actions and other aspects of the Recovery Plan were developed in consultation with a diverse range of biologists, social scientists, stakeholders and community members. Bears can be a safety concern, especially in rural areas, but the Minister's program is not based in science and does not solve the challenges of coexisting with bears.

Statement by Dr. Andrea Morehouse:

The Minister's "Wildlife Responder Program" was advertised as a new tool to improve the safety of humans and livestock. This program, however, is not backed by science. If the Minister's goal was truly to put additional tools or resources in the hands of rural Albertans who bear the brunt of sharing the landscape with grizzly bears, a myriad of better choices exists – ones that are, in fact, science-based (e.g., attractant management efforts, bear spray, education and outreach). Further, the Minister could have consulted with rural communities, wildlife managers, and scientists to ask what changes would be most effective, most helpful, most economical, or have the greatest positive impact. Instead, the Wildlife Act was quietly changed. Additionally, while the Minister has provided numbers on the grizzly bear population, he has not provided any methods or information on how these numbers were obtained. The latest population [data](#) from Alberta's bear management areas are seven to 11 years old, and despite a recovery-plan recommendation for surveys every five years, there are no clear plans for future surveys. Wildlife are a public good and Albertans deserve transparency on wildlife data and management. Wildlife management should be science-based. This move by the Minister, is not.

Dr. Andrea Morehouse is an independent scientist with her company Winisk Research and Consulting. Andrea has 17 years of experience working with rural communities on large-carnivore conflict issues, including grizzly bears.

Appendix III: Furbearers

Lifting Trapping Limits on Furbearing Animals

- November 1, 2024: Limits on furbearers (wolverine, river otter, Canada lynx and fisher) are set to unlimited where these species were managed. Trapping limits had been imposed to restrict harvesting of sensitive species²⁷.

Minister Loewen's Public Statements

- Minister Loewen has justified the removal of trapping limits as a way to collect data on the affected species²⁸.

Rebuttal: Science on harvest quotas and trapping data

- Harvest quotas have long been established to control wildlife populations and prevent overexploitation. Overharvest and a lack of limits have led to population collapse, extirpation and extinction^{29,30}. The Guide to Trapping Regulations states quotas and accurate data “prevents the overharvest of sensitive species of furbearers, ensuring a viable resource for the future²⁷.” Removal of quotas for even a short time could have devastating long-term effects on populations.
- Commercial trapping data is often biased and misleading, and does not provide accurate population estimates. In 2001, a report by Alberta Sustainable Resource Development concluded, “independent verification (long-term research studies) is required to verify cause-effect relationships between population indices and population size³¹.” Allowing unlimited trapping to collect data will not result in useable and accurate population estimates and will only increase the risk of reducing or regionally extirpating vulnerable species.

²⁷ Government of Alberta. November 1, 2024. Alberta guide to trapping regulations. Retrieved March 14, 2025, from: <https://open.alberta.ca/publications/2368-3643>.

²⁸ Global News. November 7, 2024. Trapping limit changes draw mixed reviews from Alberta researchers, hunters. Retrieved March 14, 2025, from: <https://globalnews.ca/video/10859652/trapping-limit-changes-draw-mixed-reviews-from-alberta-researchers-hunters/>.

²⁹ Halliday, T. R. (1980). The extinction of the passenger pigeon *Ectopistes migratorius* and its relevance to contemporary conservation. *Biological Conservation*, 17(2), 157-162.

³⁰ Dadswell, M., Spares, A., Reader, J., McLean, M., McDermott, T., Samways, K., & Lilly, J. (2022). The decline and impending collapse of the Atlantic salmon (*Salmo salar*) population in the North Atlantic Ocean: a review of possible causes. *Reviews in Fisheries Science & Aquaculture*, 30(2), 215-258.

³¹ Government of Alberta. August 2001. Alberta Furbearer Harvest Data Analysis. Retrieved March 14, 2025, from: <https://open.alberta.ca/publications/0778519902>.

Wolverine Management Science

- In 2024, wolverine populations in Alberta were estimated at 955 individuals (with a 95% confidence interval of 435 to 1753), and 544 adults (with broad confidence intervals)³². This number is far below IUCN standards for Threatened species³³.
- Previous studies have indicated wolverine trapping was already too high to be sustainable at previous limits of 1 wolverine per trapline in each management area^{34,35}. The population was declining before the decision to allow unlimited trapping of this species.
- In Alberta, wolverine are listed as Data Deficient, although this status is being reviewed in light of recent population estimates. Population estimates were less than 1,000 mature individuals in 2003³⁶. COSEWIC has assessed the species as Special Concern across Canada³⁷.
- Wolverine are a slow-growing species³⁴. Trapping is one of the main causes of mortality in the species^{38,39,40}. This population cannot support any additional trapping.

Fisher Management Science

- Fisher populations, while generally considered healthy in Alberta, were failing to meet intended fisher management ratios of juveniles to adult females, according to the Fisher Tooth Analysis conducted by the province²⁷. This suggests a lower reproductive rate than targeted, or fewer juveniles born to each female adult, and is

³² Fisher, J. T., Jahid, M., Gutsell, R., Hubbs, A., Cowen, L. L., Barraeto, M., ... & Paczkowski, J. (2025). An Estimate of Wolverine Density for the Canadian Province of Alberta. *Ecology and Evolution*, 15(1), e70702.

³³ IUCN. March 2024. Guidelines for Using the IUCN Red List Categories and Criteria. Retrieved March 14, 2025, from: <https://portals.iucn.org/library/efiles/documents/PP-003-En.pdf>.

³⁴ Mowat, G., Clevenger, A. P., Kortello, A. D., Hausleitner, D., Barraeto, 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.

³⁵ Barraeto, 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.

³⁶ Government of Alberta. May 2003. Alberta's Wolverine (*Gulo gulo*) : data deficient. Retrieved March 14, 2025, from: <https://open.alberta.ca/publications/albertas-wolverine>.

³⁷ Government of Canada. 2014. COSEWIC Assessment and Status Report on the Wolverine (*Gulo gulo*) in Canada. Retrieved March 14, 2025, from: https://www.sararegistry.gc.ca/virtual_sara/files/cosewic/sr_wolverine_2014_e.pdf.

³⁸ 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.

³⁹ Squires, J. R., Copeland, J. P., Ulizio, T. J., Schwartz, M. K., & Ruggiero, L. F. (2007). Sources and patterns of wolverine mortality in western Montana. *The Journal of wildlife management*, 71(7), 2213-2220.

⁴⁰ Persson, J., Ericsson, G., & Segerström, P. (2009). Human caused mortality in the endangered Scandinavian wolverine population. *Biological conservation*, 142(2), 325-331.

an early indication that population growth may no longer support high harvest rates. The ratio has shown a general decrease for several years, and the last year that ratios were equivalent to the target was in 2020, indicating populations may be beginning to decline.

- Fisher are highly sensitive to trapping and trapping can accelerate the decline of fisher populations⁴¹, especially at a regional level in Alberta, as population resiliency can differ across ecozones⁴². The species was almost absent in the 1980s due to trapping and habitat loss and was reintroduced to Central Alberta in the 1990s. In the neighbouring province of British Columbia, trapping likely contributed to the current status of these subpopulations as endangered⁴³.

River Otter Management Science

- River otter have historically been highly sensitive to overharvesting⁴⁴. Once found across most of North America, river otters were lost from southern Alberta and many other parts of Canada due to over-trapping, only recovering in recent decades with quotas reducing the likelihood of overharvest. Removing trapping limits will once more place this species at risk of overharvest and local extirpation, particularly in southern Alberta where the species is only recently reestablishing itself.

Canada Lynx Management Science

- Trapping can be a significant source of mortality in Canada lynx populations, particularly when populations are low⁴⁵. Lynx populations are cyclical, so large

⁴¹ Fogarty, R. D., Weir, R. D., Lofroth, E. C., & Larsen, K. W. (2022). Trapping mortality accelerates the decline of the fisher, an endangered mesocarnivore, in British Columbia, Canada. *Endangered Species Research*, 49, 1-12.

⁴² A. Zalewski, L.A. Wierbowska, K.B. Aubry, J.D.S. Birks, D.T. O'Mahony, C. Proulx. (2017). The Martes Complex in the 21st century: ecology and conservation, pages 249-260. Mammal Research Institute, Polish Academy of Sciences, Białowieża, Poland.

⁴³ Weir, R.D. March 2003. Status of the Fisher in British Columbia. Retrieved March 19 from: https://www.bcfishhabitat.ca/wp-content/uploads/2021/07/2003_Weir_Status-of-the-fisher-in-British-Columbia.pdf.

⁴⁴ Bricker, E. A., Serfass, T. L., Hanley, Z. L., Stevens, S. S., Pearce, K. J., & Bohrman, J. A. (2022). Conservation status of the North American river otter in the United States and Canada: assessing management practices and public perceptions of the species. *Small Carnivores: Evolution, Ecology, Behaviour, and Conservation*, 509-535.

⁴⁵ Poole, K. G. (2003). A review of the Canada lynx, *Lynx canadensis*, in Canada. *The Canadian Field-Naturalist*, 117(3), 360-376.

population declines can be difficult to detect, although past range shrinkage has been attributed to overharvesting⁴⁶.

⁴⁶ de Vos, A., & Matel, S. E. (1952). The status of the lynx in Canada, 1920-1952. *Journal of Forestry*, 50(10), 742-745.

Statement by Martin Jalkotzy:

The removal of trapping quotas on river otters will be detrimental to the recovery of the species in southern Alberta. Data from dead otters will not provide defensible population estimates and will only increase the risk of reducing or regionally extirpating this species from southern Alberta again.

Martin Jalkotzy is a retired Wildlife Biologist. He worked as the Project Manager on the Kananaskis Country River Otter Reintroduction Project.

Statement by Dr. Gilbert Proulx:

When species are at risk, or when their status is unknown due to a lack of data, a conservative, scientific approach is to stop all exploitation of the species until proper datasets have been obtained. While the Alberta Government seems to focus its management on the abundance of a species, this information is not very informative. Abundance varies with regions, habitat types, food supplies, diseases, etc. We know, however, that some carnivore species are not overly abundant because of their habitat and home range requirements, low reproductivity, and inconsistent survival due to changing food supplies. This is particularly true for wolverine, and for Canada lynx which is closely related to snowshoe hare densities. Nevertheless, for these carnivore species, the maintenance of a quota is vital to avoid overexploitation by trappers, and to allow furbearer biologists to react to a drop in annual harvests.

Banci and Proulx (1999. Resiliency of furbearers to trapping in Canada. Pages 175–213 in G. Proulx, editor, Mammal trapping, Alpha Wildlife Publications, Sherwood Park, Alberta, Canada) classed furbearer species according to their degree of resiliency, defined as the capability of a species to recover from a reduction in numbers.

Wolverine is a species with low resilience. It is sensitive to trapping because its populations have one or more of the following: 1) limited range or distribution; 2) low reproductive rate; or 3) large home range. Due to wolverine's low abundance and productivity, the replacement of trapped animals may be slow and incomplete. Wolverines occur at low densities and, even in optimal habitat, they are less abundant than other carnivores. Home ranges are large (100 to over 1,000 km²). Because wolverine travel widely and are readily attracted to baits, they are susceptible to trapping. Based on scientific studies and years of harvests across western North America, Proulx and Banci (1999) estimated maximum annual sustainable harvest rates at 10% of fall densities.

Fisher and **River Otter** are both species with intermediate resiliency. Both species have a sustainable yearly harvest rate of less than 25% of the pre-trapping population. In adequate habitats, because river otters are accidentally captured in beaver sets, and due to their low productivity (they are not sexually mature until 2 years of age), conservative policies are essential to maintain persistent populations (Banci and Proulx 1999). Because of logging, overexploitation by trappers and strychnine poisoning, fisher populations have been extirpated from many Alberta regions in the past, particularly between 1982 and 1988 (Proulx, G., A. Kolenosky, M. Badry, R. Drescher, K. Seidel, and P. Cole. 1994. Post-release movements of translocated fishers. Pages 197–203 in S.W. Buskirk, A. S. Harestad, M. G. Raphael, and R. A. Powell, editors, Martens, sables, and fishers: biology and conservation. Cornell University Press, Ithaca, New York, USA). Because of such losses, Proulx et al. (1994) carried out a successful reintroduction of the species in central Alberta

during the early 1990s (Proulx, G., and H. L. Dickson. 2014. Occurrence and distribution of fishers (*Pekania pennanti*) in the central aspen parklands of Alberta. *Canadian Wildlife Biology & Management* 3: 15–21) and, since then, the fisher population has expanded in surrounding landscapes (Proulx, G., K. B. Aubry, Adam L. Brandt, Jessica R. Brandt, Benjamin N. Sacks, Jun J. Sato, and Thomas L. Serfass. 2018. Both reintroduction and recolonization likely contributed to the re-establishment of a fisher population in east-central Alberta. *Canadian Wildlife Biology & Management* 7:96–100). It is noteworthy to mention that the re-establishment of a viable population was feasible only because trapping activities were stopped for a few years.

Minister Loewen has justified **the removal of trapping limits as a way to collect data on the affected species**. However, there are many limitations associated with harvest data. In general, harvests are poor short-term indicators of abundance and distribution (Proulx 1999). Changes in annual harvests may result from changes in abundance, but they are also a function of pelt price, weather, trapper regulations and efforts, prey cycles, economics, trappers' experience or interest, and other factors (Proulx 1999). Harvest data collected over decades may be useful to assess the effect of trapping. However, interpretation requires related information on the mortality and productivity of populations (Proulx, G., and M. W. Barrett. 1991. Ideological conflict between animal rightists and wildlife professionals over trapping wild furbearers. *Transactions of the North American Wildlife and Natural Resources Conference* 56: 387–399), and the changing distribution and quality of habitats (e.g., Proulx, G. 2009. Conserving American Marten *Martes americana* winter habitat in sub-boreal spruce forests affected by Mountain Pine Beetle *Dendroctonus ponderosae* infestations and logging in British Columbia, Canada. *Small Carnivore Conservation* 41: 51–57).

Fur harvests are not the approach to take in order to collect data on the status of a species. Data on population densities and characteristics can be collected with non-invasive techniques (e.g., Proulx, G., and E. Do Linh San. 2016. Non-invasive methods to study American and European badgers – A review. Pages 311–338 in G. Proulx and E. Do Linh San, editors. *Badgers: systematics, ecology, behaviour and conservation*. Alpha Wildlife Publications, Alberta, Canada). For example, Magoun et al. (2011. Integrating Motion-Detection Cameras and Hair Snags for Wolverine Identification. *Journal of Wildlife Management* 75(3):731–739) showed that integrating motion-detection cameras and hair snags provides a cost-effective technique for wildlife managers to monitor wolverine populations in remote habitats and obtain information on important population parameters such as density, survival, productivity, and effective population size.

In conclusion, I completely disagree with the approach taken by Minister Loewen and his Wildlife Department to manage furbearers in Alberta. I wish to state that **trappers are not wildlife managers**. Fur harvesting is only one tool among others used by wildlife biologists to monitor and manage wild animal populations (Proulx, G. 2022. The five Ws of mammal trapping. Pages 1 –21 in G. Proulx, editor. *Mammal trapping – Wildlife management, animal welfare & international standards*. Alpha Wildlife Publications, Sherwood Park, Alberta, Canada). **Furbearer management should be carried out by knowledgeable, field-experienced wildlife biologists.**

Dr. Gilbert Proulx is a Wildlife Biologist and Director of Science with Alpha Wildlife Research. His work has focused on mammal trapping, wildlife management, and human-wildlife conflicts.



March 31, 2025
Wolverine trapping quotas in Alberta

To whom it may concern:

I am writing to express my concern with the recent decision by Alberta Forestry and Parks to lift seasonal quota limits on wolverines, instead allowing unlimited wolverine trapping by Registered Fur Management Area (RFMA) holders within seasons.

I work as a Conservation Scientist with Wildlife Conservation Society Canada, with my program based in Thunder Bay, Ontario. I led a radiotelemetry project for wolverines in northwestern Alberta from 2013-2016 and a similar project in northwestern Ontario from 2018-2022. For these studies, my colleagues and I used GPS collars and cameras to track more than 100 wolverines to learn about their habitat use, density, foraging, and mortality sources. Moreover, we are conducting aerial surveys for wolverine tracks across a 60,000 km² area in northern Ontario. These projects have provided an unprecedented understanding of wolverine ecology in the boreal forest of North America from a western science perspective.

Based on findings from these field projects, combined with my broader understanding of the wolverine scientific literature, I do not support the decision to remove seasonal trapping limits on wolverines in Alberta. [Our recently-published research](#) in northwestern Alberta found that trapping is the primary source of wolverine mortality and injury in human-dominated landscapes. Predator and human use of roads and other linear features were frequently associated with wolverine mortality. We also found that wolverine populations have low resilience to increased human-caused mortality due to their inherently low reproductive rates [1]. Besides our work, there are other scientific studies that show wolverine populations have limited or negative population growth in areas with linear features and active trapping [2], [3], [4] [5]. These knowledge and data, combined with evidence that much of Alberta is currently fragmented by roads and other linear features ([ABMI 2025](#)), raises serious concerns about the impacts of trapping on wolverines in the province.

Wolverines face many threats to their persistence besides trapping, including climate change [6] and habitat loss from industrial disturbance [7], making it important to bolster population resilience by reducing human-caused mortality whenever possible. At present, neither the status of Alberta's wolverine population nor the impact of the previous quota system (1 wolverine/season/RMFA) is well understood. To understand the effects of trapping, we need accurate estimates of abundance, harvest, and other mortality sources across wolverine range in Alberta. Recent efforts to estimate wolverine abundance in Alberta highlight substantial data gaps [8].

Given these uncertainties, I strongly recommend a precautionary approach. Reinstating the previous quota system (1 wolverine/season/RMFA) would be a prudent measure until we have a better understanding of wolverine population status in Alberta.

Sincerely,

A handwritten signature in black ink, appearing to read 'Matthew Scrafford', with a stylized flourish at the end.

Dr. Matthew Scrafford
Conservation Scientist
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Thunder Bay, Ontario

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- [1] Scrafford, M. A., Seguin, J. L., McCaw, L. K., Boyce, M. S., & Ray, J. C. (2024). Wolverine density, survival, and population trends in the Canadian boreal forest. *Journal of Wildlife Management*, 88(5). <https://doi.org/10.1002/jwmg.22587>
- [2] 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), 1–15. <https://doi.org/10.1038/s41598-022-21499-4>
- [3] Krebs, J., Lofroth, E., Copeland, J., Banci, V., Cooley, D., Golden, H., Magoun, A., Mulders, R., & Shults, B. (2004). Synthesis of survival rates and causes of mortality in North American wolverines. *Journal of Wildlife Management*, 68(3), 493–502. [https://doi.org/10.2193/0022-541x\(2004\)068\[0493:sosrac\]2.0.co;2](https://doi.org/10.2193/0022-541x(2004)068[0493:sosrac]2.0.co;2)
- [4] Mowat, G., Clevenger, A. P., Kortello, A. D., Hausleitner, D., Barrueto, M., Smit, L., Lamb, C., DorsEy, B. J., & Ott, P. K. (2020). The Sustainability of wolverine trapping mortality in Southern Canada. *Journal of Wildlife Management*, 84(2), 213–226. <https://doi.org/10.1002/jwmg.21787>
- [5] Kukka, P. M., Jung, T. S., & Schmiegelow, F. K. A. (2022). Spatiotemporal patterns of wolverine (*Gulo gulo*) harvest: the potential role of refugia in a quota-free system. *European Journal of Wildlife Research*, 68(2). <https://doi.org/10.1007/s10344-022-01566-x>
- [6] Barsugli, J. J., Ray, A. J., Livneh, B., & Dewes, C. F. (2020). Projections of mountain snowpack loss for wolverine denning elevations in the Rocky Mountains. *Earth's Future*, 8(10), 1–13. <https://doi.org/10.1029/2020EF001537>
- [7] Heim, N., Fisher, J. T., Clevenger, A., Paczkowski, J., & Volpe, J. (2017). Cumulative effects of climate and landscape change drive spatial distribution of Rocky Mountain wolverine (*Gulo gulo* L.). *Ecology and Evolution*, 7(21), 8903–8914. <https://doi.org/10.1002/ece3.3337>
- [8] Fisher, J. T., Jahid, M., Gutsell, R., Hubbs, A., Cowen, L. L. E., Barrueto, M., Heim, N., & Paczkowski, J. (2025). An Estimate of Wolverine Density for the Canadian Province of Alberta. *Ecology and Evolution*, 15(1). <https://doi.org/10.1002/ece3.70702>

Dr. Matthew Scraftford leads the Wolverine Program for Wildlife Conservation Society Canada, where he documented the effects of human disturbance on wolverine abundance. He studied wolverine habitat selection, movement, foraging behaviour and density in northern Alberta.

Appendix IV: Mountain Goats, Bighorn Sheep and other species

Expansion of Minister's Special License

- July 10, 2024: Ministerial Order 46/2024 expanded the Minister's Special License to include hunting of antlered white-tailed deer, mountain goat, cougar and bison⁴⁷. Previously, the license only included antlered elk, antlered mule deer, antlered moose, trophy sheep, trophy antelope or turkey.
- In 2022, the Minister's Special License was expanded to year-round hunting, allowing holders of the license to hunt outside the designated hunting seasons^{48,49,50}.
- The Minister's Special License is auctioned to non-residents or available by draw to residents of Alberta to raise money for wildlife conservation and stewardship in Alberta⁴⁷. Non-residents must use the services of an outfitter⁵¹. Minister Loewen has travelled internationally to promote the Minister's Special License and Alberta hunting opportunities (In 2024-2025, he announced that he visited Nevada⁵², Nashville⁵³, Germany⁵⁴, Utah⁵⁵, Qatar and England⁵⁶) at large hunting conferences.

⁴⁷ Government of Alberta. July 10, 2024. Ministerial Order 46/2024. Retrieved March 17, 2025, from: https://kings-printer.alberta.ca/Documents/MinOrders/2024/Forestry_and_Parks/2024_046_Forestry_and_Parks.pdf.

⁴⁸ My Wild Alberta. June 27, 2024. Minister's Special License. Retrieved March 17, 2025, from: <https://mywildalberta.ca/hunting/ministers-special-licence.aspx>.

⁴⁹ Alberta Professional Outfitters Society. [n.d.] Minister's Special Licenses. Retrieved March 17, 2025, from: <https://www.apos.ab.ca/Community/MinistersSpecialLicences>.

⁵⁰ Government of Alberta. August 16, 2024. Alberta Guide to Hunting Regulations. Retrieved March 17, 2025, from: <https://open.alberta.ca/publications/1485-4287>.

⁵¹ Alberta Professional Outfitters Society. [n.d.] Alberta Minister's Special License. Retrieved March 17, 2025, from: <https://albertamsl.ca/MSL>.

⁵² Government of Alberta. January 16, 2025. Promoting Alberta as a world-class hunting destination. Retrieved March 17, 2025, from: <https://www.alberta.ca/release.cfm?xID=926475F7A3494-E588-900F-E8F2CF8CEB969B48>.

⁵³ Government of Alberta. January 20, 2025. Promoting Alberta's incredible wilderness in Nashville. Retrieved March 17, 2025, from: <https://www.alberta.ca/release.cfm?xID=926642CCBCD57-0CAE-484C-B5015F8B0E7E4BC7>.

⁵⁴ Government of Alberta. January 27, 2025. Promoting Alberta's incredible wilderness in Germany. Retrieved March 17, 2025, from: <https://www.alberta.ca/release.cfm?xID=926879362EDB5-95E0-F6C2-2473384B23BCE907>.

⁵⁵ Government of Alberta. February 11, 2025. Utah auction set to support conservation work in Alberta. Retrieved March 17, 2025, from: <https://www.alberta.ca/release.cfm?xID=927769A98348E-FC2A-6F18-1853AF5D551E243A>.

⁵⁶ Government of Alberta. April 23, 2025. Alberta joining global wildlife council. Retrieved May 1, 2025 from: <https://www.alberta.ca/release.cfm?xID=93186DF1A4C45-E1BA-8798-48C4A6525CF6C461>

Mountain Goat Management Science

- Mountain goats suffered significant declines in the 1900s, and these declines are highly associated with overhunting and inadequate hunting control. Alberta's Management Plan for Mountain Goats reports that harvest peaked in the early 1960s, and by the late 1960s, many populations had been depleted⁵⁷. Even as hunting became stricter, populations continued to decline, until hunting was closed in 1988. While some populations recovered while hunting was closed, others remain low⁵⁸.
- In escaping predation, mountain goats will often flee to a steep cliff or rocky ledge⁵⁹. This strategy provides little protection from hunters, and so human disturbances are more powerful and can cause far greater harm than other predation⁵⁷.
- Mountain goat populations are highly sensitive to harvest, and most populations in the province cannot withstand any hunting pressure. They reproduce much more slowly than sheep⁵⁸. Many of Alberta's populations were found to be at high risk of extinction⁶⁰. The expansion of the Minister's Special License to include these animals imposes additional pressure that Alberta's mountain goat population likely cannot afford.
- The Minister's Special Licenses allows hunting outside quotas set for each Wildlife Management Unit (WMU). That means these additional goats can be taken from any subpopulation with an open season on mountain goats, unlike WMU-specific quotas, which are set for distinct subpopulations. Since these are additional to the quotas already set, they could cause hunting pressure for populations to become unsustainable, especially if all holders of the Minister's Special License take from the same subpopulation repeatedly, as might happen in more accessible areas. There is no way to know where the additional goats will be taken each year.

Hunting Seasons and Trophy Hunting

- Hunting seasons were established to manage game species, and to avoid vulnerable times for the animal. For instance, hunting is often not permitted in spring, when animals are weaker, and females are likely to be pregnant or caring for

⁵⁷ Government of Alberta. July 1, 2003. Management plan for mountain goats in Alberta. Retrieved March 17, 2025, from: <https://open.alberta.ca/publications/077851854x>.

⁵⁸ Voyer, A. G., Smith, K. G., & Festa-Bianchet, M. (2003). Dynamics of hunted and unhunted mountain goat *Oreamnos americanus* populations. *Wildlife Biology*, 9(3), 213-218.

⁵⁹ Dulude-de Broin, F., Hamel, S., Mastromonaco, G. F., & Côté, S. D. (2020). Predation risk and mountain goat reproduction: Evidence for stress-induced breeding suppression in a wild ungulate. *Functional Ecology*, 34(5), 1003-1014.

⁶⁰ Hamel, S., Cote, S. D., Smith, K. G., & Festa-Bianchet, M. A. R. C. O. (2006). Population dynamics and harvest potential of mountain goat herds in Alberta. *The Journal of wildlife management*, 70(4), 1044-1053.

young. Hunting at this time can have a disproportionate effect on the population, as it results in the abandonment and death of juveniles, which reduces the population in the next generation.

- In some animals, such as Bighorn Sheep, trophy hunting can be severely affect population genetics, as the practice targets dominant males that are capable of defending female mates and that are responsible for most of the breeding during the rut^{61,62}.
- Hunting seasons are known to many non-hunters, who may purposely avoid areas during hunting seasons to reduce a risk of accidents. Allowing year-round hunting makes it more difficult for other recreational users to avoid hunters, and can cause discomfort for those who do not wish to be in the presence of hunters.

⁶¹ Coltman, D. W., O'Donoghue, P., Jorgenson, J. T., Hogg, J. T., Strobeck, C., & Festa-Bianchet, M. (2003). Undesirable evolutionary consequences of trophy hunting. *Nature*, 426(6967), 655-658.

⁶² Schindler, S., Ruckstuhl, K. E., & Neuhaus, P. (2020). Male mating behaviour affects growth of secondary sexual traits: a mechanism for rapid phenotypic change. *Animal Behaviour*, 169, 129-138.

Statement by Dr. Marco Festa-Bianchet:

Mountain goats are extremely sensitive to overharvest because they have a late age of first reproduction, high juvenile mortality and frequent reproductive pauses, as shown by research in Alberta. Alberta wildlife biologists have used scientific knowledge to establish highly restrictive quotas, allowing a maximum of 6 permits/year between 2017 and 2024. There were 0 permits in 3 of those years. The two additional permits from the Minister Special licence represent a 33%+ increase in provincial quota, with no scientific basis and no way of determining where these additional mountain goats will be killed. They will likely have a negative impact on the persistence of local mountain goat populations.

Dr. Marco Festa-Bianchet is a retired professor of animal ecology at the Université de Sherbrooke and conducted several studies of mountain ungulates in Alberta. He started the Caw Ridge goat study, considered the most important mountain goat study in North America, with support from Kirby Smith (Alberta Fish & Wildlife).

Appendix V: News Releases and Timelines

News Releases

- July 9, 2024: Alberta released an official statement on the decision to allow hunting of “problem” grizzly bears and elk. This news release was made more than 3 weeks after the Ministerial Order authorizing this hunt was signed on June 17.
- March 12, 2025: Alberta released a statement and held a news conference on Bill 41, outlining changes to the Wildlife Act aimed at modernization and accessibility.
- No official news releases were made for changes to cougar quotas and hunting areas or lifting of furbearer quotas. These decisions were leaked to the media after changes were already in effect.
- No official news release was made for the changes to the Minister’s Special License, although four separate announcements were made on promoting the license abroad.
- No announcements were made prior to any of these decisions and changes coming into effect, nor were there any attempts at public consultation.

Timeline for Cougar Hunting

- March 26, 2024: 2023-2024 quotas for cougars are updated on Open Government. Female cougar quota is more than doubled. AWA is informed this change is because “some stakeholders believe cougar numbers are unacceptably high.” There is no population data provided to support this claim.
- March 28, 2024: Ministerial Order 37/2024 establishes Cougar Management Areas 33-38. Area 36 includes Cypress Hills Interprovincial Park. The order also removes the requirement for the Minister to establish open season quotas “before December 1 of any year for which they are to apply.” The loss of this last requirement allows the Minister to change quotas at the start or during a hunting season, preventing protests or concerns being expressed before the new quota takes effect.
- May 6, 2024: Cougar hunting season status summary on My Wild Alberta webpage is updated. Cougar management areas is posted. New Cougar Management Areas 33-38 are included, and quotas in new management areas are set to zero. Quotas are not updated on the Open Government page.
- December 1, 2024: Cougar hunting season status summary on My Wild Alberta webpage is updated, allowing hunting of cougars in Cougar Management Areas 33-38, including Cypress Hills Interprovincial Park. Cougar hunting season begins. Biologists, conservationists and the general public have no time to react to the new quotas before the hunting season.

Timeline for Furbearer Trapping

- November 1, 2024: The Alberta Guide to Trapping Regulations is changed to remove limits on trapping of furbearing animals. This includes wolverine, fisher, river otter and Canada lynx. Wolverine and fisher trapping season begins. The public is given no time to protest these changes before the start of the season.
- *This change is in violation* of Alberta's Wildlife Regulation, which states, "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 Department⁶³." This invalidates the quota for the 2024 trapping season. Despite a letter from AWA informing the Minister of this oversight, no attempt is made to correct the mistake, or to ensure decisions align with Alberta's Wildlife Act and Wildlife Regulation.

⁶³ Government of Alberta. December 10, 2024. Wildlife Regulation, Alta Reg 143/1997. Retrieved March 18, 2025, from: <https://www.canlii.org/en/ab/laws/regu/alta-reg-143-1997/latest/alta-reg-143-1997.html>.

Appendix VI: Conflict of Interest

Personal connections

- Prior to becoming Minister of Forestry and Parks, Minister Loewen was the owner of Red Willow Outfitters, a guide outfitting business listed as hunting trophy black bear, moose, white-tail deer, elk, mule deer, wolf and waterfowl⁶⁴. His name remained listed on the website up to December 2024 (Img. 1).
- Red Willow Outfitters is currently owned by his son, with the Minister's wife as a voting shareholder (Img. 2). They remain an active guide outfitter, and have made statements on social media saying that hunting of predators boosts ungulate populations⁶⁵.
- The Minister has been active in outfitter gatherings, including attending the Safari Club International Convention Shows⁶⁶ and Wild Sheep Foundation Summit as a special guest⁶⁷. The Wild Sheep Foundation recently offered a bounty of \$3000 to \$7000 per cougar, with an additional \$1000 on female cougars in specified areas (Img. 3).
- He has made several international trips aimed at promoting the Minister's Special License and Alberta hunting opportunities, along with the Alberta Professional Outfitters Society⁶⁸, which Red Willow is a member of. In Alberta, non-resident holders of a Minister's Special License must use the services of an outfitter⁶⁹. Of the 6 species currently available for non-resident MSLs, Red Willow Outfitters offers hunts on three of them.
- Alberta Professional Outfitters Society administers the Minister's Special License auctions. The funds received from the sale of Minister's Special Licenses are distributed through the Minister's Special License Auction Grants administered by Alberta Conservation Association, and reviewed by the MSLA Grants Adjudication Committee. Recipients of these grants include Alberta Conservation Association, Alberta Hunter Education Instructor Association, Alberta Trapper's Association,

⁶⁴ Red Willow Outfitters homepage. [n.d.] Retrieved March 18, 2025, from: <https://redwillowoutfitters.com/>.

⁶⁵ Red Willow Outfitters, Facebook post. January 9, 2025. Retrieved March 18, 2025, from: https://www.facebook.com/story.php?story_fbid=1418520986230437&id=100042176482548&_rdr.

⁶⁶ RDNews. January 20, 2025. Forestry and parks minister travelling to Tennessee to promote Alberta's outdoors. Retrieved March 19, 2025, from: <https://everythinggp.com/2025/01/20/forestry-and-parks-minister-travelling-to-tennessee-to-promote-albertas-outdoors/>.

⁶⁷ Todd Loewen, Facebook post. June 17, 2024. Retrieved March 18, 2025, from: https://www.facebook.com/story.php?story_fbid=869358441673891&id=100057992293665&_rdr.

⁶⁸ Todd Loewen, Facebook post. January 20, 2025. Retrieved March 18, 2025, from: https://www.facebook.com/story.php?story_fbid=1008734144402986&id=100057992293665.

⁶⁹ My Wild Alberta. [n.d.] Minister's Special License. Retrieved March 18, 2025, from: <https://mywildalberta.ca/hunting/ministers-special-licence.aspx>.

Alberta Wildlife Federation, and Wild Sheep Foundation Alberta⁷⁰. These organizations also sit on the committee⁷¹.

- Loewen has close associations with the Alberta Trappers Association. He appeared as a guest speaker at their gala dinner in 2024, and has emphasized trapping was a family tradition for him, with his traplines passed to his sons⁷².
- Hunters, trappers and outfitters have benefited from the recent decisions, through increased harvest, bounties for cougars and other predators, and guiding of non-residents holding a Minister's Special License.

Minister Loewen: Consultations Regarding Changes

- On the removal of furbearer trapping quotas, Minister Loewen consulted only with the Alberta Trappers Association (Img. 4).
- In the recently proposed Bill 41, titled the *Wildlife Amendment Act*, the organizations that were aware of the change and provided statements for the official news release were Alberta Wildlife Federation, Safari Club International, Alberta Conservation Association, Alberta Professional Outfitters Society, and Alberta Hunter Education Instructors Association. These organizations are all closely associated with hunting and profit from expanding hunting in the province.
- There was no engagement with biologists, conservationists, naturalists and other recreational users, and the agricultural community either before or after the decisions were made. Alberta has a duty to consult with Indigenous nations on changes that could affect Treaty rights or traditional use, such as sustenance hunting and fishing⁷³, which has not been fulfilled. Despite extensive opposition from Albertans, the Minister shows no signs of acknowledging public concerns or reconsidering these decisions.

Conflict of Interest Definitions

- Cabinet Ministers “develop policies and programs that best serve Albertans⁷⁴.”

⁷⁰ Alberta Professional Outfitters Society. June 21, 2024. 2024-25 Minister's Special Licence Auction (MSLA) Funding Recipients. Retrieved March 20, 2025, from: <https://www.globenewswire.com/news-release/2024/06/21/2902251/0/en/2024-25-Minister-s-Special-Licence-Auction-MSLA-Funding-Recipients.html>.

⁷¹ Alberta Professional Outfitters Society. [n.d.] MSLA Grants. Retrieved March 20, 2025 from: <https://albertamsl.ca/MSLA>.

⁷² Kerton, B., Town and Country Today. July 22, 2024. Forestry and Parks Minister addresses Alberta Trappers Association. Retrieved March 18, 2025, from: <https://www.townandcountrytoday.com/barrhead-news/forestry-and-parks-minister-addresses-alberta-trappers-association-9217965>.

⁷³ Government of Alberta. [n.d.] Indigenous consultations in Alberta. Retrieved March 20, 2025, from: <https://www.alberta.ca/indigenous-consultations-in-alberta>.

⁷⁴ The Role of a Member. [n.d.] Legislative Assembly of Alberta. Retrieved March 12, 2025 from: <https://www.assembly.ab.ca/learn/the-legislative-assembly/roles/the-role-of-a-member>

- Alberta's Conflict of Interest Act states, "A Member breaches this Act if the Member takes part in a decision in the course of carrying out the Member's office or powers knowing that the decision might further a private interest of the Member, a person directly associated with the Member or the Member's minor or adult child⁷⁵."
- The Alberta Conflicts of Interest Act Public Agencies Fact Sheet further clarifies, "Senior officials may not take part in a decision knowing it might further their private interests or those of a person directly associated with them (e.g. spouses or companies they own)⁷⁶."
- Alberta's Conflict of Interest Act is already more limited than Canada's Conflict of Interest Act, which states, "a public office holder is in a conflict of interest when he or she exercises an official power, duty or function that provides an opportunity to further his or her private interests or those of his or her relatives or friends or to improperly further another person's private interests."
- Loewen's family and friends are deeply involved in hunting, trapping and outfitting, and stand to directly and indirectly benefit from his decision to allow increased harvest and open hunting of several species.
- The Ethics Commissioner initially limited the decisions Minister Loewen could make, due to concerns over conflicts of interest (Img. 5). Although they claim these issues have since been resolved, we disagree due to clear biases and connections Minister Loewen has shown and the benefits he derives from his recent decisions.

Benefits to Minister Loewen and his family

- Minister Loewen's family benefits from the decision to increase trapping quotas through the traplines owned by his sons.
- The expansion of the Minister's Special License includes white-tailed deer, a species that Minister Loewen's family outfitting business targets. The Minister's Special License also includes elk, mule deer and moose, other species targeted by Red Willow Outfitters. The allowance of year-round hunting may draw additional interest, especially from non-resident hunters, who are required to use the services of an outfitter.
- Minister Loewen has stated that reducing predators will improve ungulate populations, such as moose, deer, and elk. These are species hunted by his former and his son's current business, Red Willow Outfitters. Scientific literature generally fails to support this idea, although it does not negate that Loewen made a decision

⁷⁵ Government of Alberta. December 20, 2024. Conflicts of Interest Act. Retrieved March 18, 2025, from: <https://open.alberta.ca/publications/c23>.

⁷⁶ Government of Alberta. May 1, 2020. Conflicts of Interest Act : public agencies fact sheet. Retrieved March 18, 2025, from: <https://open.alberta.ca/publications/conflicts-of-interest-act-public-agencies-fact-sheet>.

to increase predator harvest with the understanding that it would improve ungulate populations and could benefit his family's outfitting business.

- Minister Loewen's decisions additionally align with those of hunting, trapping and outfitting associations, which he has close connections to. For instance, his relaxing of cougar quotas coincided with the Wild Sheep Foundation offering a bounty on cougars, with an additional incentive for females. His decisions favor only a few small groups, and do not best serve all Albertans.

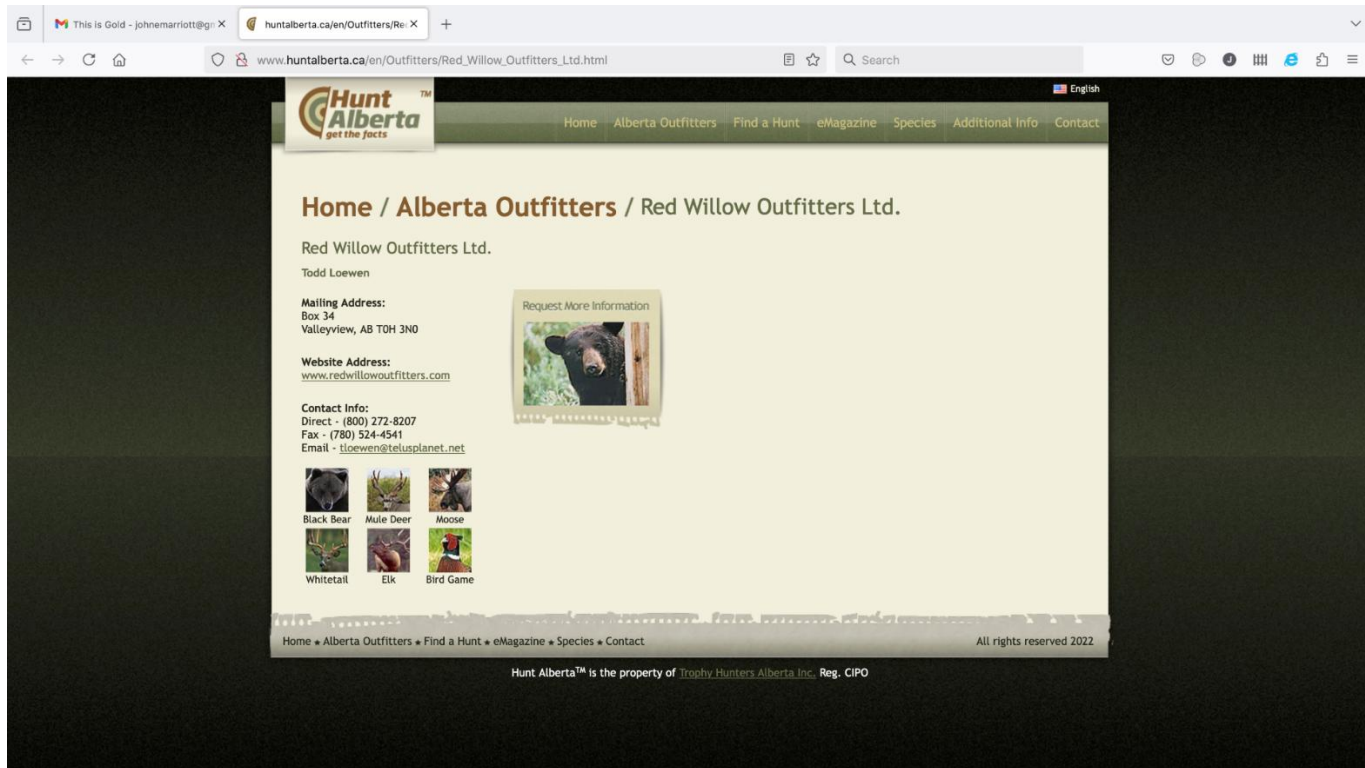


Image 1. Screenshot of Red Willow Outfitters webpage on December 5, 2024. Saved webpage with timestamp is also available.

Voting Shareholders:

Last Name: LOEWEN
First Name: TAYLOR
Middle Name: DANIEL
Street: BOX 34
City: VALLEYVIEW
Province: ALBERTA
Postal Code: T0H3N0
Percent Of Voting Shares: 61

Last Name: LOEWEN
First Name: TEENA
Middle Name: MAE
Street: BOX 34
City: VALLEYVIEW
Province: ALBERTA
Postal Code: T0H3N0
Percent Of Voting Shares: 39

Image 2. Voting Shareholders of Red Willow Outfitters, from Government of Alberta Corporation/Non-Profit Search on December 2, 2024. Full document is available.

Wild Sheep Foundation 2024/2025 Cougar Program Requirements

- 1) The cougars harvested are to be from Sheep Management Areas (SMAs) which include the following WMUs – 300,302, 303B, 303A, 306, 308, 400, 402, 404, 406, 408, 410, 410A, 410B, 412, 414, 326, 416, 417, 418, 420, 422, 428, 426A, 430A, 426B, 430B, 432, 434, 328, 429, 436, 437, 438, 439, 440, 441, 442B, 444B, 442A, 444A, 446, and 445. **We strongly encourage that they are to be on or very near sheep winter range or lambing areas.**
- 2) **NEW-MUST** provide present GPS data, elevation, and pictures (or video) of the hunt and kill location. A picture of your GPS at the kill location with the coordinates clearly displayed is mandatory, and cat in the background. Proof of sex of the animal must be included as well.
- 3) **NEW-**We will be paying out an amount of up to \$3,000/cougar that meets the program criteria
- 4) **NEW-**We will pay up to an additional \$1,000 if the harvested cougar is female. Proof of sex of the animal must be included.
- 5) **NEW-**We will pay up to \$7,000 if the cougar is harvested in the following WMU's considered to be high priority: 408, 410, 412, 420, 422, 432, 434, 440, 442 and 444. (Note: the female incentive would not apply to these harvests).
- 6) **NEW-**Furthermore, any cat harvested out of WMU 404, 414, 416 and 418 we will pay up to \$5,000 per cougar (Note: the female incentive would not apply to these harvests). The added incentive for this zone is based on the effort level involved to access, and the severity of recent predator activity.
- 7) Only houndsmen/outfitters in good standing with their affiliate organization are eligible for this program (not the general public). Your current outfitter number is required, and a copy of certificate must be provided.
- 8) Must be a current member in good standing of the WSFA. Please purchase your memberships online at <https://wsfab.org/membership/>. This must be purchased prior to accepting application. Thank you! We ask that you help support WSFA even further by encouraging your staff and clients to purchase a WSFA membership as well. Please and Thank you!
- 9) Submit an expense breakdown upon successful hunts. For example expenses may include items such as dog maintenance, feed, collars, fuel, horses, etc.

Image 3. Wild Sheep Foundation Cougar Program Requirements for 2024-2025. Taken from Cougar Management Program Application Form shared by the Wild Sheep Foundation Alberta (WSFA).

1. Who was consulted in the decision-making process? Can you provide meeting minutes or documentation of these consultations? [The Alberta Trappers Association was the only external stakeholder consulted. Multiple discussions took place with them from early January 2024 until the quotas were removed by the Minister in October 2025.](#)

Image 4. Response to question on consultation for the removal of furbearer quotas. Taken from email exchange with Alberta Forestry and Parks shared with AWA.

Mr. Loewen: Yeah. I appreciate that question. I just want to start off by saying how important it is to build that trust and confidence. That's what this legislation should do, but it has to also make sense, and it has to be very clear.

I guess, kind of thinking of my personal experience with this, when I first became a minister, I had to divest myself of my business, put it in a trust. At that time I never heard any, you know, comment from the Ethics Commissioner's office about any kind of conflict or anything like that. But then, of course, a complaint came in, and somebody suggested that maybe there was. Then I received a letter from the Ethics Commissioner's office suggesting that there are some decisions I couldn't be involved in. I couldn't make certain decisions on certain things.

When I first received that, both myself and my department thought this was kind of odd because it basically cut down a huge chunk of what I could make decisions on in that particular department. So myself and the department prepared basically something to take to the Ethics Commissioner's office to be able to present and maybe get a little clearer understanding and maybe provide a little extra information for the office to make a different decision. So that was done, and then the next thing we got was a letter that even was more restrictive and more broad as far as what I couldn't do or couldn't be involved in. In a subsequent conversation we found, you know, several months later, that the Ethics Commissioner's office suggested that they were surprised that this was still an issue, that it was still bothering me that I couldn't make these decisions.

Image 5. Minister Loewen's response on Conflicts of Interest, taken from meeting minutes of the Legislative Assembly of Alberta.