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

August 15, 2025

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

Dear Minister Loewen,

Alberta Wilderness Association (AWA) is writing to express significant and increasing concerns with the recent changes to hunting, as published in the *Alberta Guide to Hunting Regulations*[1]. These changes were once again made without public consultation or scientific direction, impact the extent and efficiency of hunting and threaten the sustainability of our wildlife populations and environment.

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 10,000 members and supporters in Alberta and across Canada, AWA is dedicated to conserving and protecting Alberta's wilderness.

We are concerned with several recent changes to hunting regulations. These changes include:

1. Allowing off-leash hunting dogs to hunt black bears in select Wildlife Management Units (WMUs).
2. Allowing the meat of double-crested cormorants to be wasted.
3. Additional or extension of elk and black bear hunting seasons.

Details regarding each of these concerns are provided below.

Allowing off-leash hunting dogs to hunt black bears

The *Alberta Guide to Hunting Regulations* states, "Black bear hunting with dogs is now permitted in Wildlife Management Units 344, 346, 347, 349, 350, 351, 352, 353, 354, 355, 356,

[1] Government of Alberta. (2025). Alberta Guide to Hunting Regulations. Retrieved August 13, 2025 from: https://albertaregulations.ca/2025-Alberta-Hunting-Regulations.pdf

439, 440, 441, 442, 444, 445, 446, 511, 524, 525, 527 and 537 in September and October during an open season."

Prior to this change, dogs were only allowed for cougar hunts, and only during the winter quota season (December 1 to March 31). This extends the duration that off-leash hunting dogs can be used by several months.

Off-leash dogs can harm non-target wildlife. Even well-trained dogs can attack or stress other species, including species at risk. They can also cause indirect harm by destroying nests, dens and habitat. With the extended seasons where dogs can be used in hunting, there is a greater risk of harming non-target species at vulnerable stages in their life, and causing unintended damage.

As justification, the *Alberta Guide to Hunting Regulations* states, "This is being done in order to support predator management in areas where caribou recovery is a concern." However, several of these WMUs — such as 346, 349 and 351 — are outside caribou range[2], and are unlikely to support caribou due to a lack of habitat suitability[3]. Additionally, while black bears are a source of caribou mortality[4], other jurisdictions have noted the challenges in reducing the risk of predation by black bears[5,6], which suggests that additional pressure from hunters would not be sufficient to reduce black bear predation on caribou. The best method to recover caribou remains through habitat protection and restoration[7].

Use of dogs can also affect bear behaviour. For instance, when black bears are stressed by dogs or hunters, they are more likely to travel closer to paved roads, presenting a risk for vehicle collision[8]. As well, the WMUs where this practice is now allowed are likely to contain grizzly bears, a Threatened species that should be excluded from hunting. Dogs trained to chase black

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[2] Government of Alberta. (2017). Alberta caribou ranges. Retrieved August 13, 2025 from: https://open.alberta.ca/dataset/932d6c22-a32a-4b4e-a3f5-cb2703c53280/resource/8335d979-394e-4959-ac5c-014dc2106df9/download/albertacaribouranges-map-nov2017.pdf.

[3] Schneider, R. R., Wynes, B., Wasel, S., Dzus, E., & Hiltz, H. (2000). Habitat use by caribou in northern Alberta, Canada. *Rangifer*, *20*(1), 43-50.

[4] Ballard, W. B. (1994). Effects of black bear predation on caribou--a review. *Alces*, *30*, 25-35.

[5] Wilson, S. F., & Bio, R. P. (2009). Recommendations for predator-prey management to benefit the recovery of mountain caribou in British Columbia. Retrieved August 13, 2025 from: https://www.vws.org/documents/Orphan-Files/Heli-killingwolves.pdf.

[6] Newfoundland and Labrador Environment and Conservation. (2015). A report on Newfoundland Caribou. Retrieved August 13, 2025 from: https://www.gov.nl.ca/ffa/files/wildlife-pdf-caribou-complete.pdf.

[7] Bentham, P., & Coupal, B. (2015). Habitat restoration as a key conservation lever for woodland caribou: A review of restoration programs and key learnings from Alberta. Rangifer, 123-147.

[8] Stillfried, M., Belant, J. L., Svoboda, N. J., Beyer, D. E., & Kramer-Schadt, S. (2015). When top predators become prey: black bears alter movement behaviour in response to hunting pressure. *Behavioural processes*, *120*, 30-39.

bears are likely to also chase grizzly bears, which could lead to dangerous encounters for the bear, the dog or the hunter. Previously, up to four grizzlies a year were killed as "Mistaken for black bear[9]." This number could increase with the use of dogs.

The use of dogs to hunt black bears is unlikely to support caribou recovery, and could have unintended consequences for wildlife, habitat and other users on the land.

Wasting meat of double-crested cormorants

Last year, double-crested cormorants were reclassified as a migratory game bird. Unlike other game birds under this category, cormorants are not often harvested for food, and the wasting of their meat reflects this distinction.

Double-crested cormorants were found to feed heavily on non-native species[10] and on invasive species that may compete with sport fishing[11]. Without cormorants, invasive fish species could increase in abundance, affecting aquatic ecosystems and fisheries. The impact of cormorant removal in Alberta is not well understood, although considering the potential impact their removal could cause, we ask that monitoring and reporting requirements are established that address the amount of harvest by individual hunters, the total harvest of cormorants annually, the population estimate and trend in Alberta, and the impact of cormorant removal on other birds, fish and the ecosystem.

Extension of elk and black bear hunting seasons

Additional seasons or expanded seasons for elk were allowed in several WMUs this year, following the trend of expanded elk seasons seen in 2024. This year, black bear seasons in several WMUs were also expanded.

While elk populations are currently considered stable in Alberta, black bear population trends are less clear. Alberta's Black Bear Management Plan was last updated in 2016, using formal population estimates made for the 1993 management plan, although some more recent studies

[9] Government of Alberta. (2024). Grizzly bear mortality rates in Alberta. Retrieved August 13, 2025 from: https://open.alberta.ca/publications/grizzly-bear-mortality-rates-in-alberta.

[10] Johnson, J. H., Ross, R. M., & McCullough, R. D. (2002). Little Galloo Island, Lake Ontario: a review of nine years of double-crested cormorant diet and fish consumption information. *Journal of Great Lakes Research*, *28*(2), 182-192.

[11] Bugajski, A. (2011). Double-Crested Cormorant Feeding in Multiple Lake Environments: Intrinsic Markers Reveal Several Prey Sources and Frequent Site Switching by Breeding Birds. The University of Regina (Canada).

are available[12]. As the management plan states, "Without further information, it is impossible to disentangle these factors and surmise the overall trend of black bear populations in the province." Black bears are a slow-growing species, with a generation time (average time between generations in the same lineage) of roughly six years[13], and small litters of one to four cubs[14]. To ensure that hunting of black bears is sustainable, Alberta must have an accurate understanding of current population density and trends. Monitoring is needed to obtain a better understanding of the current population, with clear thresholds and sustainable harvest limits based on population estimates.

The expansion of hunting opportunities should follow the best available science and align with public interests. We therefore request evidence to support the expansion of hunting seasons for elk and black bear, and any consultations with stakeholders that occurred.

Other concerns

The minimum age to hunt big game has been lowered to 10 years old, with the minimum age to hunt unsupervised now 12 years old. This decision places the children and youth, other users in the area, and the ecosystem at risk. Compared to experienced hunters, youth, especially unsupervised youth, are more likely to struggle with accuracy and correctly identifying targets. This may result in more mistakes, for instance, in hunting game animals that are not legal, or in disturbing sensitive species. Youth may also be less aware of how to conduct themselves safely, and animals could respond with aggression.

Many of these changes are expected to improve the efficiency and success of hunting or extend the duration and access to hunting seasons. However, without appropriate limits on harvest, increases in access and efficiency are likely to result in unsustainable harvest pressures on wildlife populations. Sustainable limits to hunting must be set based on scientific data and best practices, and align with the advice of expert biologists.

Thank you for your attention to this matter. We are requesting a meeting with you to discuss this issue further. We look forward to your prompt response.

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[12] Government of Alberta. (2016). Management Plan for Black Bears in Alberta. Retrieved August 14, 2025 from: https://open.alberta.ca/dataset/3274cf4f-3cd5-430a-9a6b-20813737642f/resource/79507b50-af50-4b1a-bfcb-00ff614f4fc2/download/2016-managementplan-blackbear-jan2016.pdf.

[13] Puckett, E. E. (2025). Phylogeography of introgression: Spatial and temporal analyses identify two introgression events between brown and American black bears*. Heredity*, 1-12.

[14] McDonald Jr, J. E., & Fuller, T. K. (2001). Prediction of litter size in American black bears. *Ursus*, 93-102.

Sincerely,

ALBERTA WILDERNESS ASSOCIATION

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Conservation Specialist

Cc: Sarah Elmeligi, Shadow Minister for the Environment (Banff.Kananaskis@assembly.ab.ca).
Rebecca Schulz, Alberta Minister of Environment and Protected Areas (epa.minister@gov.ab.ca).