

October 1st, 2015

Honourable Rachel Notley
Premier of Alberta
408 Legislature Building
10800 - 97 Avenue
Edmonton, Alberta
T5K 2B6

Honourable Shannon Phillips
Minister of Environment and Parks
425 Legislature Building
10800 - 97 Avenue
Edmonton, Alberta
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Dear Madam Notley and Madam Phillips,

In past years, I have written a number of letters to previous Premiers and Environment Ministers and, to their credit, I have received replies and on-going exchanges. I write to you and Madam Phillips today to reiterate my concerns as an Albertan and as a human being.

I have deep concerns over wild management in Alberta, as well as land management and water management. My biggest concern however, is the plight of the wolf in Alberta and the dwindling caribou population in the north.

I set out my concerns as follows:

1) I have spent quite some time reading and digesting the research article published in the Canadian Journal of Zoology by Hervieux, Hebblewhite, Stepnisky, Bacon and Boutin titled “Managing Wolves (Canis lupis) to recover woodland caribou (Rangifer tarandus caribou) in Alberta”

I am truly mortified by the fact that this study was every allowed to happen, let alone the results, and it does not lend itself as support for a government

that is committed to protecting our natural legacy of biodiversity for future generations and certainly not for healthy caribou and wolf populations.

For seven years aerial gunning and strychnine, a widely-banned poison, Strychnine, has been used in attempts to save the Little Smoky herd from wolf predation. Strychnine causes a painful death in its victims and widespread secondary poisoning - 841 wolves were killed (154 by poisoning) and strychnine also accidentally poisoned 6 lynx, 31 foxes, 91 ravens, 36 coyotes, 4 fishers, 8 martens and 4 weasels. These are the documented losses - the death toll almost certainly was higher and included other species like chickadees and gray jays. And...the caribou herd remains critically threatened anyway. Why? Because logging and oil exploration continue to devastate caribou habitat. This is how the previous Alberta Government dealt with species at risk and built its global reputation for environmental stewardship.

Dr. Mark Bekokff and Dr. Paul Paquett, among other renowned scientists, have condemned this study. The study itself condemns the ongoing slaughter of wolves as a viable option for actual recovery of the woodland caribou.

I provide quotes below from various sources, including Hebblewhite himself, regarding the ineffectiveness of killing wolves to recover caribou:

Culling Alberta's wolves without prioritizing caribou habitat protection and restoration is like "shovelling sand," according to Mark Hebblewhite, associate professor of ungulate habitat biology at the University of Montana.

Hebblewhite says the Alberta government is sponsoring a wolf cull without doing the one thing that could possibly scientifically justify it: conserving and restoring critical caribou habitat.

"That's the tragedy here: the Alberta government blew the opportunity to do the right thing," he said.

"It's all shovelling sand without real commitment to habitat conservation."

The province's use of predator management has generated serious controversy, especially in light of continuing sales of oil and gas leases in caribou ranges, a move experts say undermines the scientific integrity of the wolf cull.

"There are all kinds of ethical problems in this mess," Hebblewhite told DeSmog Canada.

"It's unethical to sell oil and gas leases in endangered caribou critical habitat."

*Hebblewhite recently published a paper, *Managing Wolves to Recover Threatened Woodland Caribou in Alberta*, that demonstrated the wolf cull in the Little Smoky and A La Peche regions helped stabilize local caribou herds, but won't contribute to their long-term survival without habitat recovery and protection.*

"We are still destroying caribou habitat...it shows quite clearly that we're killing wolves and we are not doing anything to recover caribou or the boreal forest."

"The whole issue around oil and gas leases is it shows the government working at cross-purposes," Paquet said. "I think it undermines their credibility."

He added the negative effects of unrestored seismic lines on caribou habitat has been known for decades, but both government and industry have failed to take meaningful action.

"They don't seem intent on doing what needs to be done," Paquet said, adding the failure to protect caribou habitat throws the province's ongoing wolf cull into a "moral dilemma."

Research recently published by Hebblewhite and his colleagues shows that while the killing of wolves in some areas has stabilized populations, aggressive predator control was unable to put caribou back on a path to self-sustaining populations.

“All of this is useless if the primary reasons for caribou decline isn’t addressed and that primary one now is loss of habitat and degraded habitat,” Paquet said.

Hebblewhite agrees.

The wolf cull “reminds us we’ve screwed up the entire ecosystem,” Hebblewhite said. “Killing wolves is a short-term response to that. It buys us time.”

The continued logging and energy development in the core caribou ranges is what turns this whole program in to a lethal farce. While calf recruitment increased marginally, adult animals died faster. This is certainly not a recipe for long term herd survival. The authors of this study argue that, without wolf control, the caribou numbers would have dropped faster and that to oppose wolf control, is to opt for caribou extirpation. But the previous Alberta Government had already opted for caribou extirpation by refusing to protect the habitat. This makes wolf control simply a window dressing. The use of strychnine, in addition to other horrific methods of killing wolves, makes it a morally repugnant window dressing.

Without habitat protection, wolves will need to be killed forever, or at least until the last caribou dies for lack of habitat. If there is nowhere to feed and reproduce, then of course there will be no caribou.

2) In addition to the ineffectiveness of the cull towards actual recovery, there is the **ethical issues of the cull** and of the study itself. Contact was made with the Director of Ethics office at the U of A asking why they allowed Dave Hervieux and Stan Boutin to use the Little Smoky wolves as research animals, when use of strychnine was clearly in violation of the Canadian Council of Animal Care Guidelines, as noted in the study by Ryan Brook, Paul Paquet and Gilbert Proulx, amongst others – entitled “Maintaining Ethical Standards during Conservation.

The answer given by the Director of Ethic’s office was that Alberta was not a signee to the CCAC standards, so not a concern. Later it was found that,

according to the CCAC in Montreal, Alberta was indeed a signee to the standards. **Unbelievable that the Director of Ethics did not know this.**

In Canada, where animal welfare falls under provincial jurisdiction, most provinces have adopted CCAC standards when revising their regulations. To date, the following eight Canadian provinces have amended their respective legislation to directly reference CCAC standards: **Alberta**, Manitoba, New Brunswick, Newfoundland and Labrador, Nova Scotia, Prince Edward Island, Quebec and Saskatchewan.

With regards to Alberta specifically:

The revised Alberta Animal Protection Act (APA) was proclaimed in January 2006. Previously in Alberta, only academic institutions were subject to provincial regulations referencing CCAC standards, as these standards were referenced exclusively in the Alberta Universities Act. In 2005, the Universities Act and two other legislations were reviewed by the Alberta Agriculture, Food and Rural Development Ministry (AAFRD), with the aim of combining them and updating their content. **As a result of discussions between the CCAC and the AAFRD, article 2(1) of the Animal Protection Regulation of the revised APA now states that "a person who owns or has custody, care or control of an animal for research activities must comply with the following Canadian Council on Animal Care documents", and lists all 22 CCAC standards, including the CCAC Guide to the Care and Use of Experimental Animals and the various guidelines and policy statements published by the CCAC. View the Alberta Act and its regulations.**

3) **Use of snares.** The previous Government of Alberta often quoted the Fur Institute of Canada in its justification of the use of snares and traps in the Province of Alberta. I do not believe that it takes the Fur Institute to weigh in one way or another in order for a reasonable, prudent person to be abundantly clear on the fact that snares, Conibear and leg hold traps are not humane and it is upsetting that the previous Alberta Government hid behind such a statement from a group in whose best interest is to state that these devices are humane. Furthermore, traps and snares are not species specific. There have not only been non targeted wild species

caught in these devices, but caribou have also been caught in these vile devices as well as many domestic dogs, people's pets.

4) **Use of strychnine** is far more lethal than perhaps you may be aware and it is notorious for moving through food chains to scavengers. It is strychnine that resulted in the wolves, swift fox, turkey vultures, ravens and even magpies vanishing from most of the Great Plains in the late 1800's. It took years for even magpies, a very resilient species, to recover and ravens took until the 1970's. Swift fox had to actually be reintroduced. Strychnine is banned in the USA because of its cruelty and non-target toxicity.

5) **Land use and wolves.** Farmers and ranchers are given the express right to kill on sight, wolves close to their property. This includes animals that have not preyed upon livestock.

Questions: a) Given the effectiveness of non-lethal methods proven by ranches all over North America, including The Grazerie in Alberta, are these business people required to implement any nonlethal, proactive measures to avoid conflict with predators such as appropriate disposal of carcasses, canine or equine guard animals (dogs, donkeys), ranch riders, electric fencing, wild life corridors, technological deterrents?

b) Would the current Alberta Government be willing to assist in these deterrents?

Of course these people (ranchers and farmers) must be able to be allowed to make a living and they do face many challenges. I see no reason, then, not to form an education program to assist these people but with a mind towards nonlethal, conservation and ecology and with lethal solutions as an absolute last measure.

I understand that there was a very successful program in place in Southern Alberta with the last Government. Much as I was exceptionally disappointed in the track of the previous Alberta Government with respect to conservation and environment, we must give credit where it is due and there seems to have been success in this venture.

The State of Oregon Government also promotes nonlethal methods to deter predation and their program has been very successful.

6) **Why is it that wolves may be killed legally for 10 months** of the year with no bag limit in Alberta? No other animal, be it predator or prey is persecuted to this extent. It is unfathomable why this would be allowed. It is unreasonable and inhumane to continue with this type of persecution of one particular species, one amongst many that is so critical to a healthy ecosystem.

7) **And finally, bounties** - the previous Alberta Government quietly told municipalities that culling/bounties are ineffective and in fact, according to the best science available, the culling of predators can increase the predator population and certainly livestock predation on three fronts:

First, reproduction rebounds with the demise of the numbers of a population. Single litters can become larger and more animals may produce litters - especially if the animal taken was one or both of the Alpha pair in a pack.

Secondly, as culls/hunting/contests typically target the larger animals of a species, clearly this would represent adults, the more skilled and knowledgeable of the species is lost. This leaves behind the less experienced hunters of a predator species who would then prey on livestock instead of the more difficult prey of deer, moose and other ungulates that they would have learned to hunt with the mentorship of the adult predators.

Third, when you cull, you create a vacuum and vacuums do not exist in nature, therefore the void left by killing a group of wolves, will be filled by another wolf pack, coyote pack, bear or cougar who will prey on livestock.

In Alberta there are two types of bounties, municipal and private.

Several MD's and Counties offer bounties of up to \$500 per wolf.

The Sheep Foundation and the Safari Club International in Red Deer are funding bounties from Grand Cache to Calgary to about \$5000-6000 each

through 6 trappers locals. The Safari Club President has said they only funded the Sundre local one year and are not this year. The sheep herders have been funding since 2007 to about \$100,000 at present.

Why are we allowing the Sheep Foundation to come into the Province and kill predators in order to simply increase the number of ungulates so that they can increase their own profits when in fact this is adding to the issues and conflicts between predators, livestock and humans?

Recent decisions by the Federal Government with respect to environment, habitat, wildlife etc have made it abundantly clear to most Canadians, including other Premiers, that we cannot look to the Federal Government for strong, effective, science based solutions to impacts on environment and climate change. Besides an educated vote in the next Federal election, the only other thing that Canadians can do is to look to our Provincial Governments to provide effective, long term solutions. In Alberta, we are looking to Madam Notley and to Madam Phillips.

“Alberta must become a world leader in environmental stewardship or risk being left behind”, Premier Jim Prentice said in November of 2014.

We now know sadly that he had no intention of initiating this.

Madam Notley, Madam Phillips, you have not made a promise such as this and yet, in you, I do see the potential for Alberta to truly become a world leader in environmental stewardship.

In closing, I invite you to please consider:

- 1) A meeting with myself and my colleague to discuss these matters further.
- 2) To review the enclosed letter to the Honourable Alison Redford, which sadly was never replied to by Madam Redford.
- 3) Attending the International Wolf Week events, either in Calgary or Edmonton
- 4) Making changes to the Wolf Management Plan and to the way wolves are hunted in Alberta including culls, trapping/snare, poison and bounties, as well as placing restrictions on the number of months that any

hunting can take place (pregnant females and pups are routinely killed) and by placing limits on the number of wolves that can be taken.

- 5) Implement a non-lethal plan to educate and provide funds that will help farmers and ranchers to reduce predation by nonlethal, proactive measures to avoid conflict with predators such as appropriate disposal of carcasses, canine or equine guard animals (dogs, donkeys), ranch riders, electric fencing, wild life corridors, technological deterrents. Doesn't it make more sense to be pro-active rather than reactive?

Yours truly,

Calgary, Alberta
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