

Alberta Chapter of The Wildlife Society  
Box 4990, Edmonton, Alberta  
T6E 5G8  
Nov. 27, 2002

Hon. Shirley McClellan, Minister of Agriculture, Food and Rural Development and  
Hon. Mike Cardinal, Minister of Renewable Resource Development  
Legislative Building  
10800 – 97 Ave.  
Edmonton, Alberta  
T5K 2B6

Dear Madam and Sir:

The **Alberta Chapter of The Wildlife Society (ACTWS)** is the provincial arm of *The Wildlife Society*, an international science-based group of professionals working in the field of wildlife management and conservation. It is the strong opinion of ACTWS that big game farming in Alberta seriously threatens the health and welfare of the province's wildlife with the potential to result in substantial losses to the economics of attendant recreation and tourism. Immediate phase-out of the industry in the province would be an important step toward safeguarding Alberta's world-class wildlife heritage.

In 1992 ACTWS expressed concern to the Alberta government about the potential detrimental effects of big game farming to the province's wildlife. Subsequent evolution of Alberta's big game farming industry over the past decade involved a number of events that have shown most of our concerns were legitimate and remain valid (see attached summary).

Further, since 1992 the new and potentially devastating chronic wasting disease (CWD) has become established in big game farm stock and wild deer in Saskatchewan and in the northwestern United States. The means of CWD transmission among ungulates is not well understood nor are the implications to human health. However, the chance of its spread appears to be increased by maintaining animals in close confinement. Eradication or control of CWD is especially difficult to achieve because it cannot be diagnosed in live animals and remains untreatable. The cost of attempting to address existing outbreaks in terms of compensation, allocation of government field and laboratory staff and support, and potential losses to the recreational and tourism industry is staggering.

Recently CWD was found in an elk and a white-tailed deer on two Alberta big game farms. This is a realization of our worst fears. In addition, drought conditions experienced over central Alberta have resulted in forage shortages and in a few cases big game farmers have threatened to release their stock to the wild. In one case the threat may have been realized, with (escaped/released?) domestic elk in direct contact with wild ungulates.

Recent dramatic cuts in the budgets of your respective Departments give us little confidence that the sufficient resources can be assigned to give this issue the attention it

requires. We strongly encourage you to seriously reconsider the wisdom of continuing big game farming in Alberta.

The Alberta Chapter of the Wildlife Society requests a reply indicating:

- how your Departments intend to address the most recent disease (CWD) threat and safeguard our native wildlife, and;
- legislative and other changes that we can expect to address ACTWS concerns, if a big game farm phase-out is not considered.

Yours truly

Blair Rippin, Conservation Committee Chair, ACTWS

Cc: Hon. Ralph, Premier

Hon. Ken Nichols, MLA, Leader of the Official Opposition

Hon. Debbie Carlson, MLA, Liberal Environment Critic

Hon. Raj Pannu, MLA, ND

## **Alberta Chapter of The Wildlife Society**

### **Concerns on the Effects of Big Game Farming to Alberta's Native Wildlife Populations**

In our 1992 letter to the Alberta Ministers of Agriculture and Forestry, Lands, and Wildlife we expressed strong concern that the governments continued sanctioning of big game farming in the province would pose a significant threat to the health and welfare of Alberta's native wildlife. The ensuing negative effect to the economics of recreation and tourism was predicted to be serious and widespread.

Evolution of Alberta's big game farming industry over the past decade involved a number of events that have shown most of our concerns were legitimate and remain valid. The following is a summary of ACTWS's original concerns and the subsequent incidents and changes that occurred over the decade since 1992.

***(A) Regarding the threat of disease in the wild, it was the strong opinion of ACTWS that big game farming would:***

- **greatly enhance chances of introducing untreatable, detrimental parasite and disease agents into our wildlife.**

***Subsequent changes:***

Concern about potential introduction and spread of devastating disease agents to Alberta wildlife was a major focus of the 1992 ACTWS document. Of particular concern were brain worm (*Parelaphostrongylus tenuis*) and bovine tuberculosis (TB). As a result, Alberta's borders were closed to import of big game animals from specific jurisdictions.

However, ACTWS predictions of occurrence and spread of TB in big game farmed animals were realized in the 1990s at a loss of a minimum of 4200 animals, costing millions of dollars in compensation from public revenue, and substantial effort by government regulators to control.

Fortunately, under the jurisdiction of the Fish and Wildlife Division, an intensive, mandatory reporting system was developed to track inter-farm movements. This greatly facilitated the task of TB control. However, this apparent high degree of control was compromised after the jurisdictional shift to Alberta Agriculture that resulted in a much less accurate annual reporting system. This degree of control will be much less useful in addressing new disease threats. For example, the presence of TB in free ranging bison in Alberta's north and the possibility of it occurring again in game-farmed animals remains a very serious threat to the province's wildlife and to its livestock industry.

The threat of chronic wasting disease (CWD) has recently become a very serious issue of concern. At the time of ACTWS's 1992 letter, CWD had not been discovered in Canada's wildlife. However, in the late 1990s CWD in both farmed and wild ungulates in Saskatchewan has resulted in major and very expensive culling programs in that province both on farms and in the wild. Associated with that outbreak, Alberta killed approximately 250 wild deer in 2001 along the eastern border to test for possible incidence in deer. It may just be fortuitous that no positive results have yet arisen from that area.

***Current concerns:***

Alberta laws governing game farming are complex and attempt to address the threat of such disease agents entering the province. However, the recent entry of CWD into Alberta is very likely the result of non-compliance to import regulations. Therefore, the government's ability to ensure compliance and enforce rules with the limited degree of current resources remains questionable. The extreme threat that this presents to Alberta's wildlife as well as to recreational and tourism economics can not be overstated.

***(B) Regarding access, it was the view of ACTWS that big game farming would:***

- **continue to erode the habitat base on private lands used by wild ungulates;**
- **continue to erode public access to wildlife on private land; and**
- **possibly extend the above issues to crown land.**

***Subsequent action:***

Game farming continued to expand rapidly and resulted in substantial tracts of private land becoming unavailable to wild ungulates and a number of other wildlife species that could not cross the 8-9 foot Paige-wire fences required to contain game farm stock. As well, public access to wildlife inhabiting privately owned big game farms became more difficult to achieve. Recently, lobbying was also done by some big game farmers and bison ranchers to extend their operations to leased crown land.

***Current concerns:***

Continuation of big game farming has and we believe will result in further erosion of the wildlife habitat base and further restrict public options to access wildlife, with substantial negative consequences to the recreation and tourism industry. Current deliberations about public land grazing of bison may expand the use of big game farm fencing, resulting in further public and wildlife restrictions on crown land.

***(C) Regarding associated illegal activity and wildlife availability, it was the view of ACTWS that big game farming would:***

- **increase options and incentives for illegal acquisition and disposal of wildlife; and**
- **decrease the number and distribution of ungulates available in the wild setting.**

***Subsequent changes:***

Concerns about illegal acquisition, disposal, and threats of reducing wild stock were largely addressed by the development of mandatory registration and reporting systems governing animal births, deaths, movement, as well as the earning of "disease-free status" on game farms. As well, big game farmers recently agreed to remove options for acquisition from the wild.

The sale of meat, prohibited in initial legislation, was touted as an incentive for illegal activity. However, marketing of meat from game farmed animals was sanctioned after 1992, albeit only through government inspected abattoirs as a safeguard to address human health.

In 1992, administrative jurisdiction of big game farming was shifted from the Wildlife Management agency to the Department of Agriculture and assigned a meager amount of staff and resources to enforce the complex regulations governing the industry. As a result, effective monitoring for compliance remains questionable.

Hunting of big game farmed animals on licensed farms was initially forbidden. However, recent intense lobbying (2001-02) resulted in reconsideration by regulators. To their credit a government caucus group rejected the proposal in August 2002.

***Current concerns:***

Although substantial progress was made to accurately track game farmed stock, recent enforcement level and efforts to assure compliance is grossly inadequate. For example, efforts to track big game animals for disease control purposes during mid-nineties tuberculosis (TB) outbreak were greatly facilitated by the mandatory monthly reporting system established and implemented while under Fish and Wildlife Division jurisdiction. However, annual reporting instituted by Alberta Agriculture results in considerably less confidence in tracking animal movements. Present monitoring for general regulation compliance is notably lax as evidenced by reports of unregistered animals and escaped animals that have not been reported. It is probable that increased numbers of farms and stock will result in need for greater surveillance but we have little confidence the regulatory agency will have appropriate budgets to assign further resources. Recent budget and staff reductions in regulatory agencies are expected to further exacerbate this situation.

***(D) Regarding genetics of wild ungulates, it was the view of ACTWS that big game farming could:***

- **result in genetic contamination of wild stock of some species, with resultant detrimental effects on their environmental adaptability. (Of particular concern was possible escape of elk/red deer hybrids that could contaminate wild elk.)**

***Subsequent changes:***

Concern about possible genetic contamination of wild elk was legitimate in the early days of game farming because hybrid stock could legally be imported. These fears were allayed only after import of stock from jurisdictions that likely supplied mixed-blood animals was discontinued. Subsequently, considerable effort was incorporated to detect and neuter previously imported hybrids.

***Current concerns:***

It is agreed the concern about possible genetic contamination via red deer hybrids has been adequately addressed. However, selective breeding of game farmed animals is generating traits that would be undesirable in wild stock. Farmed stock continues to escape at a significant rate and the threat of introducing undesirable traits into wild stock remains of concern.

***(E) Regarding wildlife values and management effort, it was the view of ACTWS that big game farming would:***

- **result in degradation of traditional wildlife values; and**
- **reduce traditional wildlife resource management effort and incentive.**

***Subsequent changes:***

Because big game farming has been allowed to proceed, concerns about degradation of wildlife values and declining wildlife management effort remain valid and significant. Recent dramatic reductions in budgets and staff within the Fish and Wildlife Division are further evidence of the ongoing degradation of the wildlife management effort in the province.

**Summary of ACTWS 1992 concerns, relevant events 1992-2002, present validity of concerns**

<b>ACTWS 1992 concerns</b>	<b>Events and actions 1992 to 2002</b>	<b>Present validity</b>
Threat of disease introduction	<ul style="list-style-type: none"> <li>- TB was introduced via imports</li> <li>- Control achieved after major culling and compensation program</li> <li>- CWD reported on Alberta BGFs</li> <li>- 250 wild deer sacrificed for testing purposes</li> </ul>	<ul style="list-style-type: none"> <li>- Concern remain extremely high and valid</li> <li>- Potential for TB remains</li> <li>- High potential for CWD with potential for devastating effects on wild stock</li> <li>- Loss of markets and lack of forage leading to intentional release of stock</li> <li>- Considerable public cost for testing and compensation</li> <li>- Substantial negative consequences to recreation and tourism economics</li> </ul>
Reduction of wildlife access to habitat on private land	<ul style="list-style-type: none"> <li>- Big game farming expanded</li> <li>- Wild ungulates and large wildlife denied access to habitat</li> </ul>	<ul style="list-style-type: none"> <li>- Concern remains valid</li> <li>- Further expansion will continue to reduce habitat base</li> </ul>
Reduction of public access to wildlife on private land	<ul style="list-style-type: none"> <li>- Big game farming expanded</li> <li>- Public access diminished</li> </ul>	<ul style="list-style-type: none"> <li>- Concern remains valid</li> <li>- Further expansion will continue to reduce public options</li> <li>- Negative consequences for hunting/tourism economics</li> </ul>
Possible extension of wildlife and public access restrictions on crown land	<ul style="list-style-type: none"> <li>- Big game farming remained restricted to private land</li> <li>- Bison grazing sanctioned on crown leases, but pending official decision to continue and/or expand</li> </ul>	<ul style="list-style-type: none"> <li>- Concern remains valid</li> <li>- Lobbying by big game farmers and bison ranchers to extend operations to crown land</li> </ul>
Increase in potential for illegal activities	<ul style="list-style-type: none"> <li>- Considerable effort to develop, implement, and enforce animal tracking system</li> <li>- Very limited resources assigned to assure compliance</li> <li>- Various infractions continue to occur</li> </ul>	<ul style="list-style-type: none"> <li>- Concern reduced but remains valid because of inadequate monitoring and enforcement</li> </ul>
<b>ACTWS 1992 concerns</b>	<b>Events and actions 1992 to 2002</b>	<b>Present validity</b>
Decrease in number and distribution of wild ungulates	<ul style="list-style-type: none"> <li>- Acquisition from the wild occurred with considerable infractions and enforcement effort</li> <li>- Wild acquisition recently ceased</li> <li>- 250 wild deer recently killed for CDW testing</li> </ul>	<ul style="list-style-type: none"> <li>- Concern regarding acquisition addressed only after occurrence of numerous infractions</li> <li>- Concerns remain valid regarding actions to reduce wild stock for testing or disease control</li> </ul>

Increase in potential for genetic contamination in wild stock	<ul style="list-style-type: none"> <li>- Imported elk carried red deer genetics</li> <li>- Hybrids considered undesirable</li> <li>- Considerable efforts undertaken to cull domestic herds</li> <li>- Import discontinued in 1988</li> </ul>	<ul style="list-style-type: none"> <li>- Concern regarding red deer genetics now low</li> <li>- Concern remains valid regarding probable escape of selectively bred farmed animals</li> </ul>
Degradation of traditional wildlife values	<ul style="list-style-type: none"> <li>- Expanding numbers of wild ungulates behind fences seen by many as devaluing wild stock</li> </ul>	<ul style="list-style-type: none"> <li>- Concern remains valid</li> </ul>
Reduction of wildlife management effort and incentive.	<ul style="list-style-type: none"> <li>- Enforcement and biological staff required to address expanding BG F industry (e.g., disease control, escapees, infractions, etc.) reduced resources for traditional wildlife management</li> </ul>	<ul style="list-style-type: none"> <li>- Concern remains valid</li> <li>- Recent budget and staff cuts in management agencies decrease likelihood of adequate attention</li> </ul>

Prepared November 27, 2002 by B. Rippin, Chair of ACTWS Conservation Committee