

February 20, 2025

The Honourable RJ Sigurdson
Minister of Agriculture and Irrigation
131 Legislature Building
10800 - 97 Avenue
Edmonton, AB
T5K 2B6

Dear Minister,

A coalition of wildlife agencies met on February 12, 2025 to discuss the legalization of Cervid Harvest Preserves (CHP) in Alberta. All of the signatory organizations on this open letter to the government share deep concerns with the direction being considered by the Ministry.

To be clear, each of our organizations are strongly opposed to any of the changes being considered to the Livestock Industry Diversification Act 18.01 (1), or to the amending of any other legislation that may pertain to this issue of legalizing Cervid Harvest Preserves in Alberta in any form. In short, we are opposed to the legalization of Cervid Harvest Preserves.

CHP promote unethical "hunting", they negatively impact the health of wildlife through diseases such as Tuberculosis (TB) and Chronic Wasting Disease (CWD), and they put our agricultural economy at risk.

We do not support the so-called "hunting" of fenced in domesticated wildlife. Cervids (deer, elk and moose) raised on game farms are not wild, they have been raised by humans their entire lives and have no fear of humans nor do they have any survival instincts.

The Canadian Public Trust in Wildlife which was affirmed by the Canadian Supreme Court in 2004 is further eroded by the legalization of CHP. Wildlife in Canada is a Public resource and is revered by the general public as such. To allow the shooting of penned wildlife for a high price on their head will further erode that reverence which will also have a negative effect on future conservation objectives for wildlife as a whole.

There has been TB on game farms in Alberta in the past and that cost taxpayers \$25 million to clean up and prevented Canada from obtaining TB Free status on the world market. CWD, while first introduced to Saskatchewan, and then Alberta was via game farms. There

is no doubt among biologists that CWD in the wild came from direct contact with some of those infected farm animals or from transporting them.

Canadian taxpayers have already paid out millions of dollars in depopulating infected game farms and in compensation to their owners.

Vast amounts of taxpayer money has been spent on trying to eradicate or at least contain CWD in the wild with Fish & Wildlife staff and sharpshooter control projects. There is also the huge amount of taxpayer dollars spent every year in Alberta on the testing of both domesticated and wild cervid brain samples to monitor the spread of CWD.

The legalization of CHP will allow for more animals and their trailers to move around the province and for the import of animals from Saskatchewan where their "Hunt" Farms are losing their appeal to clients. This will likely lead to an increased probability of even greater infectious disease spreading.

To allow the expansion of game farms with the legalization of CHP will open the door even further and cause the probability of more strains of CWD to be created and possibly even new diseases to start up. We do not believe our Government should be taking that risk with our public wildlife and with the future implications to agriculture in this province.

Research has conclusively demonstrated that as CWD increases, population levels in wild cervids declines. The attempts for containment of CWD in the wild has involved the depopulation (killing) of large numbers of deer in Alberta. These attempts, though somewhat successful, could have serious implications for biodiversity if required again, and could seriously impact species at risk such as caribou.

While there is currently no direct scientific evidence that CWD can affect humans, new research has shown that non-human primates can and have contracted CWD through the consumption of CWD positive meat. Furthermore, there is no scientific basis for human immunity to CWD. Prion diseases have been shown to cross species barriers in the past with mad cow disease being the best known example. Research has also shown that plants, including alfalfa and cereal crops, when planted in CWD infected soils will take the CWD prion up into the stem and leaves of the plant. When those plants were fed to deer they became infected with CWD.

In surveys conducted by the Alberta Wildlife Federation (Alberta Fish and Game Association), to gauge public opinion, the voting public has been strongly opposed to the concept of Cervid Harvest Preserves in the past.

As Canadians, we draw immeasurable benefits from healthy populations of deer, moose, elk, and caribou. They are important components of our cultural heritage and are a focal

point of many social activities. Hunting and wildlife-related activities contribute billions of dollars annually to the Canadian economy. A recent study presented by the OFAH shows that legitimate hunting, trapping and fishing contributes \$15.2 billion to the Canadian economy annually. Wild cervids are an important part of Canada's biodiversity and fulfill key roles in many of Canada's most iconic ecosystems.

We strongly encourage that you as Minister of Agriculture not only prevent the legalization of CHP, but reconsider the justification for cervid game farms in Alberta at all. We would like to see you work with that industry to find a fair transition out of them. There is just too much risk to our wildlife populations, our agricultural economy, and our public health to continue to enable the game farming industry by helping it to expand.

It was once believed that wild Boar Hunting Farms was a good idea too, and we now have wild boars causing problems, running loose in 24 counties across Alberta.

We ask that you do the right thing now, for the sake of our future generations of Albertans.

You may contact any of our organizations directly for additional information in regards to our position.

Sincerely,

Kelly Carter, CEO, Alberta Wildlife Federation (AWF)

Deborah Donnelly, Executive Director, Alberta Wilderness Association (AWA)

Darrell Rowledge, Director, Alliance for Public Wildlife (APW)

Darrell Crabbe, Executive Director, Saskatchewan Wildlife Federation

Sean Southey, CEO, Canadian Wildlife Federation

CC: The Honourable Adriana LeGrange, Minister of Health

The Honourable Rebecca Schulz, Minister of Environment and Protected Areas

The Honourable Danielle Smith, Premier of Alberta, President of the Executive Council, Minister of Intergovernmental Relations