



ALBERTA CHAPTER OF THE WILDLIFE SOCIETY

Honourable Todd Loewen, Minister of Forestry and Parks
131 Legislature Building, 10800-97 Ave.
Edmonton, Alberta, T5K 2B6

July 30, 2024

Re: Concerns Regarding New Grizzly Bear Hunting Regulations

Dear Minister Loewen,

The Alberta Chapter of The Wildlife Society (ACTWS), representing over 500 wildlife professionals in the province of Alberta, is writing to express our concerns regarding the recently announced changes to grizzly bear management. Our membership is composed of wildlife scientists, managers, and consultants, many of whom are internationally recognized for their contributions to wildlife and habitat management. Our mission is to inspire and empower wildlife professionals to engage in science-based management and conservation of wild animals and their habitats. As an affiliate of The Wildlife Society, the largest organization of wildlife professionals in the world, we emphasize the importance of evidence-based practices.

The recently announced changes, allowing the hunting of grizzly bears involved in human-bear conflicts or located “in areas of concern,” are troubling. Grizzly bears were listed as a Threatened species in Alberta in 2010 due to high mortality rates, declining habitat conditions, and a population size of fewer than 1,000 mature individuals¹. Permitting a grizzly bear hunt under these conditions requires sufficient scientific backing and comprehensive public consultation, both of which are lacking from the current approach.

Despite claims of an increasing population², there have been no updated population estimates for the last six to ten years in the seven Bear Management Areas (BMAs)³. Over 70% of these BMAs still have unknown population trends, highlighting a significant gap in current data. Without current and ongoing population estimates, it is unclear whether lethal control of grizzly bears might pose a risk to the bear populations.

Science is the foundation for decision making in wildlife conservation⁴. Hunting has not been shown to be an effective method for dealing with bear-human conflicts and can be counterproductive⁵. Bears associated with human settlement are most likely to be females with cubs⁶, although hunters preferentially kill adult males⁷. Removal of adult males results in replacement by younger males that promptly kill all cubs within their home range to bring females into estrus so that they can breed with those females⁷. Alberta’s proposed hunt to remove problem animals is ill-conceived and not based on science⁸.



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Additionally, the decision to permit private citizens to hunt grizzly bears without direct ties to conflict situations or proper program monitoring is alarming and potentially dangerous. Without effective monitoring, it is impossible to know if a hunt is removing bears in conflict with humans. In cases where a grizzly bear poses a threat, the situation should be managed by trained wildlife officers to ensure the correct bear is killed and to ensure public safety during the hunt. Furthermore, allowing members of the public to kill a bear and keep it could lead to an increase in illegal poaching, which is already the leading cause of grizzly bear deaths in Alberta (29%)³.

Lethal control should be a last resort for human-bear conflict cases. Instead, coexistence should be prioritized using strategies that align with the Alberta Grizzly Bear Recovery Plan (AGBRP)⁹ which emphasizes non-lethal methods for mitigating human-bear conflicts. This plan was developed through comprehensive consultation with bear experts, public stakeholders, First Nations and Métis organizations, and the Endangered Species Conservation Committee. Recommendations include hiring full-time staff for the Alberta BearSmart program, employing human-wildlife conflict specialists throughout the province, and investing in infrastructure to secure agricultural attractants⁹.

Successful models, like the Montana Blackfoot Challenge, demonstrate the efficacy of these community-based solutions, including education, electric fencing, effective garbage management, and livestock carcass removal. These non-lethal tools have been shown to manage human-wildlife conflict effectively and should be implemented in advance of any hunting-based approaches.

Aversive conditioning and attractant management also have proven effective. Techniques such as using specially trained dogs or noise and pain stimuli to move bears out of developed areas, when combined with proper attractant management, can reduce human-bear conflicts and associated grizzly bear mortality.^{10,11,12}

We urge you to reverse the changes that allow a hunt of grizzly bears and instead prioritize non-lethal methods for managing human-bear conflicts as outlined in the AGBRP. We emphasize the need for the Government of Alberta to implement and fund the AGBRP. Comprehensive consultation with bear experts, public stakeholders, and the Endangered Species Conservation Committee is crucial to implementing an effective grizzly bear management strategy.

Thank you for your attention to this critical matter. We look forward to your response and hope for a solution that ensures both human safety and protection of Alberta's grizzly bear population.

Sincerely,

Stan Boutin, President, Alberta Chapter of the Wildlife Society



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