

Office of the Auditor General of Canada – Environmental Petition

Title: An environmental impact statement assessing the ecological effects of wide-scale wolf reduction programs underway is necessary and overdue.

Submitted by Wolf Awareness Inc. May 26, 2020



Wolf Awareness
Research • Education • Conservation

Petition:

- 1. MINISTER OF ENVIRONMENT AND CLIMATE CHANGE:** As part of their provincial caribou recovery efforts Alberta has killed approximately 2,500 wolves since 2005 and BC has killed more than 1,000 wolves since 2015. The Section 11 partnership agreements for caribou recovery between the federal government and the provinces of Alberta and British Columbia (BC) recommend killing wolves indefinitely in caribou recovery units. Specifically, the 2019 draft *Agreement for the conservation and recovery of Woodland Caribou in Alberta*¹ recommends wolf population management for all [Woodland Caribou] ranges in whole or in part on provincial land to be carried out on an ongoing basis with 5-year reports. Similarly, BC's 2020 *Section 11 Agreement for Southern Mountain Caribou*² indicates that predator management programs will be conducted annually throughout each Land Planning Unit (LPU) until British Columbia, Canada, and the West Moberly and Sauteau First Nations agree that Southern Mountain Caribou habitat conditions no longer require it. Given that that wolves are recognized for having major roles in maintaining diversity and important ecological processes, why has no environmental impact statement assessed the ecological impacts of wolf killing in these ecosystems?
- 2. MINISTER OF ENVIRONMENT AND CLIMATE CHANGE:** Given that the costs for wolf and ecosystem restoration in Yellowstone National Park exceeded US \$30 million³ following the intentional extirpation of wolves, at what point will the financial,

¹ <https://talkaep.alberta.ca/10127/widgets/39424/documents/18338>

² https://www2.gov.bc.ca/assets/gov/environment/plants-animals-and-ecosystems/wildlife-wildlife-habitat/caribou/canada_british_columbia_conservation_agreement_for_southern_mountain_caribou_in_british_columbia.pdf

³ <https://www.theguardian.com/environment/2020/jan/25/yellowstone-wolf-project-25th-anniversary>

ethical and ecological costs of killing wolves outweigh the potential benefit of maintaining caribou (or other species) in situ? Has this parameter been defined?

3. **MINISTER OF ENVIRONMENT AND CLIMATE CHANGE:** Why is the government willing to functionally extirpate wolves when scientific evidence suggests that this will result in negative ecological repercussions?
4. According to the Canadian Council on Animal Care (CCAC 2003), a killing method is humane if it causes rapid (immediate) unconsciousness and subsequent death without pain or distress. Death by strychnine ingestion is inhumane, as it causes frequent periods of tetanic seizures, occasional cessation of breathing, hyperthermia, extreme suffering, and death from exhaustion or asphyxiation, which typically occurs within 1–2 hours of the onset of clinical signs (Khan 2010). However, death can take up to 24 hours or longer if the dose is low (Eason & Wickstrom 2001).

The use of strychnine is in contravention of *Canadian Council on Animal Care guidelines (CCAC 2003)*, *the American Veterinary Medical Association (AVMA 2013)*, *the Canadian Veterinary Medical Association (CVMA 2014)*, and *the American Society of Mammalogists (Sikes et al. 2011)*. [Source: Proulx et al. 2015]. In addition, the International Union for Conservation of Nature has denounced the use of poison, incentive programs, and hunting with mechanised vehicles (e.g. aerial shooting) in wolf management programmes (IUCN 2000), all of which are in practice in Alberta's caribou recovery program. On top of inhumanely killing wolves, the indiscriminate nature of Strychnine has already killed a federally listed species (grizzly bear) in addition to 12 other non-target species in a program aimed at killing wolves, several of which are listed as *sensitive* under Alberta's Wildlife Act.

Also, the practice of aerial gunning fails to meet criteria set in CCAC guidelines (2010) on euthanasia of animals used in science which includes the following: "Euthanasia should result in rapid loss of consciousness, followed by respiratory and cardiac arrest and ultimate loss of all brain function."

MINISTER OF ENVIRONMENT AND CLIMATE CHANGE and HEALTH

MINISTER: Why is the federal government supporting wildlife management techniques that use strychnine and aerial gunning when these practices are not supported and are in fact condemned by Canadian and international expert bodies?

5. **MINISTER OF ENVIRONMENT AND CLIMATE CHANGE:** Please will you provide information about the size/area, location and date of implementation for habitat protection measures in caribou ranges, in addition to the land already outlined in the Section 11 Agreements, where wolf reduction programs are underway?

6. **MINISTER OF ENVIRONMENT AND CLIMATE CHANGE:** How much of the newly protected land in question 5 has not undergone anthropogenic manipulation for resource extraction and is in effective caribou habitat? In other words, what amount of caribou-friendly climax habitat has been additionally protected where predator and primary prey kill programs are underway?
7. **MINISTER OF ENVIRONMENT AND CLIMATE CHANGE:** Why is Canada not including caribou shepherding programs as a non-lethal approach to support caribou recovery whereas these programs have successfully helped stabilize caribou numbers in other parts of the world?
8. In addition to non-target deaths, serious concerns exist regarding the inhumaneness of strychnine. Health Canada has acknowledged the growing concern among Canadians about the use of pest control products to control vertebrate pests and initiated a public Consultation on Humane Vertebrate Pest Control in December 2018 in order to consult with Canadians on how the humaneness of pesticides to control predators could be considered during their approval and use (RVD2020-06). As noted above, strychnine is a component of a wolf kill program underway in Alberta since 2005 ostensibly for caribou recovery.

PMRA's directive for 15-yr re-evaluations for all pesticides registered in Canada prior to 1994 (DIR2001-03) states the following:

The PCPA provides the Minister of Health broad discretionary authority to determine information requirements, principles, policies and standards to be applied in the evaluation and re-evaluation of pest control products.

HEALTH MINISTER: please outline your intentions, with a timeline, to incorporate humane standards policy in the evaluation and re-evaluation of pest control products.

9. Emerging prion pathogens such as Bovine Tuberculosis [BT] and Chronic Wasting Disease [CWD] are serious biological threats facing North America which warrant immediate evidence-based wildlife management decisions. CWD has not yet arrived in British Columbia but it is spreading among wild deer and elk populations in Alberta and Quebec as well as Saskatchewan, which experienced a record number of cases of CWD in 2019⁴. CWD was first detected in the United States of America where it continues to spread and has been detected just south of British Columbia's border in multiple regions of Montana. There are at least two wildlife populations known to be infected with BT in Canada: the wood bison of northern Alberta and the adjacent Northwest Territories in and around Wood Buffalo National Park and the elk and deer of southwestern Manitoba in

⁴ <https://www.cbc.ca/news/canada/saskatchewan/chronic-waste-disease-number-sask-1.5191522>

and around Riding Mountain National Park (GOC 2015). BT has also been detected in domestic cattle in BC and AB.

Scientists suggest that healthy wolf populations can contribute to reducing and limiting the spread of these diseases (Hobbs 2006, Stronen et al. 2007, Wild et al. 2011).

MINISTER OF ENVIRONMENT AND CLIMATE CHANGE and HEALTH

MINISTER: how do you reconcile removing wolves over vast portions of a province or territory ostensibly for caribou recovery in a measure that is counterproductive to management efforts seeking to minimize disease transmission and which could have grave impacts on both wild and domestic animals?

Background Information:

Yellowstone National Park recently celebrated 25 years of wolf restoration and rewilding, spending approximately US \$30 million in recovery efforts^{5,6}. Meanwhile, the intentional extirpation of wolves is swelling across BC, Alberta and Northwest Territories (NWT) as tax dollars and private corporate funds pay for the removal of wolves in and around caribou ranges. Since 2005 Alberta has killed more than 2500 wolves as part of caribou recovery efforts. BC began a program in 2015 which has killed more than 1000 wolves. NWT is the third province or territory in Canada to aerial gun wolves, beginning in March 2020.

Wildlife management policies based on reducing carnivore numbers have caused severe harm to many other organisms, as evidenced when wolves were eradicated from Banff National Park (Hebblewhite et al. 2005) and Yellowstone National Park in the USA (Ripple and Beschta 2004). The ecological benefits wolves and other apex consumers provide is becoming increasingly understood and scientifically documented (Estes et al. 2011, Ripple et al. 2014) and includes critical, invaluable, and irreplaceable functions such as control of disease spread, limiting invasive species, and maintaining plant and animal species diversity.

Wolves are now recognized for their important role in maintaining biological diversity and resilience (Hebblewhite et al. 2005, Estes et al. 2011, Beschta and Ripple 2009, Ripple et al. 2014), and yet no environmental impact assessment has ever been conducted to measure the major ecological effects of wolf reduction programs underway as part of any species recovery program. Such an assessment would likely show widespread destabilizing damage to ecosystem processes and functions. Stability in ecosystems is something on which we and other species depend.

The ecological consequences of this action are resulting in ecological debt which is being immorally placed on future generations. As Yellowstone has shown, the damage will be expensive to restore. Restoration of caribou-friendly climax habitat may not be possible given

⁵ <https://www.motherjones.com/environment/2011/04/10-reasons-protect-wolves-climate-change/>

⁶ <https://www.theguardian.com/environment/2020/jan/25/yellowstone-wolf-project-25th-anniversary>

the interaction between changing climate, increasing pollution, and ongoing extraction of natural resources.

Wolf kill programs fail to consider the immediate and long-term effects this type of "management" has on wolf genetic and social structures, other wildlife, and the sustainability of the entire ecosystem. Aerial gunning, toxicant use, trapping incentives, and any other management practices aimed at wide-scale reduction of carnivore populations should be abandoned until the Environment Minister releases a federal environmental impact statement for any lethal wildlife reduction program in Canada.

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