



The Alberta Fish & Game Association is your voice in conservation

June 28, 2021

Honourable Jason Nixon
Minister of Alberta Environment and Parks
Office of the Minister
323 Legislature Building
10800 - 97 Avenue
Edmonton, AB, T5K 2B6
Emailed to: aep.minister@gov.ab.ca

Re: AFGA Concern Regarding Management Strategy

Dear Minister Nixon,

The Alberta Fish and Game Association (AFGA) has some serious concerns about the dramatic reduction in resident harvest allocations, while there has been a significant increase in harvest allocations to outfitters. These skewed allocations were initially noticed relating to the moose allocations for the 2021 hunting season. This concern was brought to our attention by resident hunters applying for the moose draws in Wildlife Management Unit (WMU) 349. They inquired of us, why there was such a significant drop in the tags available to resident hunters for the rut and late seasons, as indicated on AlbertaRELM.

When I started to look into these allocation changes, I found the moose allocations for the 2021 hunting season on open.alberta.ca and those, in addition to the 2020 draw summaries information from AlbertaRELM, confirmed these massive reductions. In WMU 349, the resident rut season allocations had gone from 97 in 2020 to 27 for 2021, and the late season resident draws from 124 to 33, resulting in an approximately 73% reduction in opportunity for resident hunters! At the same time however, outfitter allocations increased nearly 20% in the WMU from a total of 33 last year to 40 for 2021. Outfitter allocations now represent a whopping 67% of the number of resident tags. This is an alarming deviance from the maximum standard of 10% of the resident allocations.

We shared our findings with Travis Ripley and other AEP staff we met with on June 21, 2021. As there was no prior notice of the concern, they did not have information readily available for a response but committed to check into it. In follow-up communications regarding the process for the allocations, the quick and thorough response from AEP was very much appreciated.

It was later discovered, according to data on AlbertaRELM, that the number of draws available for residents in WMU 349 were returned to near 2020 levels, however, the outfitter allocations remain at approximately 18%, and is certainly not the only WMU with outfitter allocations significantly above the historical standard. Even in WMUs where there were increases in resident draws like WMU 350 for example, outfitter allocations increased by 30%. WMU 351 only has a total of 80 resident moose draws for the two seasons, but outfitter allocations were increased from 39 to 47 or nearly 59% of resident opportunity. WMU 354 had an 18% increase in resident tags, but outfitter tags rose by 170% from 7% of resident allocations last year to nearly 16% now.

We realize there has been an adjustment in outfitter allocations due to COVID-19, however it is evident that these allocations and others were already well over standards in many WMUs prior to the pandemic. We appreciate the stress the pandemic has placed on outfitters along with most other small businesses in Alberta, and across Canada, but this pressure is also felt by the general public. We have seen a substantial increase in the number of Albertans hunting and fishing, whether simply to relieve stress, the opportunity to utilize a valued public resource or to put high quality, organic food on the table. In many WMUs priority levels required for a successful draw application are already very high. These trends will only increase those wait times.

Due to pandemic restrictions and restructuring at AEP, much of the work of the various committees that would be aware and actively dealing with these issues has not been happening. Hopefully, with the success of the vaccines and the Alberta Health and Safety guidelines, we are near the end of restrictions, and this valuable work will continue.

We strongly encourage AEP to communicate and work more with the AFGA and ensure that important committees such as the Alberta Game Policy Advisory Committee (AGPAC) start meeting again, and the five-year review of the outfitter's allocations take place, as it is long overdue and may be a contributing factor to some of our concerns.

After some delays, the Mule Deer Management Plan Committee met and was presented with a strategy to curb the increase and spread of chronic wasting disease (CWD). Even with the world leading research being undertaken in Alberta, CWD continues to spread rapidly, and now threatens our parks and caribou herds. Although the highest positive percentage rates continue to be in male mule deer, the new strategy is heavily focused on reducing female mule deer instead. While we are glad to see a new approach, as status quo has obviously been unsuccessful, the AFGA is extremely concerned that there are not enough mule deer buck tags being allocated to address CWD.

The Alberta Fish and Game Association
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Our hope is that the answer to all of these concerns is based on sound, proven wildlife management strategies, and not due to lobbying pressure applied by any one stakeholder. At the forefront of all decisions, priority should always be placed on the health and conservation of the species, and the traditional and sustainable use of the resource. Decisions regarding harvest opportunities, especially those drastic in nature, must be based on accurate and reliable information and monitoring.

The AFGA looks forward to working cooperatively with AEP to conserve Alberta's wildlife and wild places in perpetuity.

Sincerely,



Brian Rudyk
Hunting Chair
The Alberta Fish and Game Association

cc:

Travis Ripley, Executive Director, Fish and Wildlife Stewardship

Matt Besko, Section Head, Wildlife Health and Licensing

Victor Benz, President, AFGA

Delinda Ryerson, Executive Director, AFGA