Alberta Wilderness Association
"Defending Wild Alberta through Awareness and Action"

May 6, 2026

Species at Risk Public Registry Office
Environment and Climate Change Canada
351 St. Joseph Blvd - 21st Floor
Gatineau, QC K1A 0H3
By email: SARAregistry@ec.gc.ca

RE: Proposed listing of Snowy Owl (*Bubo scandiacus*) under SARA

To whom it may concern,

Alberta Wilderness Association (AWA) appreciates the opportunity to provide comments for the proposed listing of Snowy Owl (*Bubo scandiacus*) under Schedule 1 of the *Species at Risk Act* (SARA) as 'Threatened.' Considering the suspected decline and the importance of the tundra ecosystem, AWA supports the listing of this species.

Founded in 1965, AWA strives to help Albertans understand the intrinsic values that wildlife and wilderness provide, and encourage communities to participate in conservation initiatives that will ensure a legacy for future generations. With over 10,000 members and supporters in Alberta and across Canada, AWA is dedicated to conserving Alberta's wilderness, and advocating for conservation strategies that protect Canada's biodiversity.

Snowy Owl populations are in decline, as determined through multiple sources, including the Christmas Bird Count and a study by Bird Conservation International[1]. Populations were found to be much lower than previously expected, and continued declines are anticipated. The species continues to face multiple threats, including disease, pesticide application, collisions with infrastructure and transmission lines, and habitat loss. These threats have few mitigations available, and until they can be adequately addressed, Snowy Owl populations will likely continue to decline.

Further, snowy owls are considered an indicator species, so their decline indicates likely declines in the health of the tundra ecosystem. Tundra environments have been vastly changed through human activities, particularly oil drilling[2] and pollution[3]. In addition, climate change threatens the region, through changing permafrost and snow conditions[4], and encroachment of shrubs[5]. Tundra ecosystems

[1] McCabe, R. A., Aarvak, T., Aebischer, A., Bates, K., Bety, J., Bollache, L., ... & Therrien, J. F. (2024). Status assessment and conservation priorities for a circumpolar raptor: the Snowy Owl Bubo scandiacus. Bird Conservation International, 34, e41.
[2] Kearns, N. B., Jean, M., Tissier, E. J., & Johnstone, J. F. (2015). Recovery of tundra vegetation three decades after hydrocarbon drilling with and without seeding of non-native grasses. Arctic, 16-31.
[3] Kirdyanov, A. V., Krusic, P. J., Shishov, V. V., Vaganov, E. A., Fertikov, A. I., Myglan, V. S., ... & Büntgen, U. (2020). Ecological and conceptual consequences of Arctic pollution. Ecology Letters, 23(12), 1827-1837.
[4] Berteaux, D., Gauthier, G., Domine, F., Ims, R. A., Lamoureux, S. F., Lévesque, E., & Yoccoz, N. (2016). Effects of changing permafrost and snow conditions on tundra wildlife: critical places and times. Arctic Science, 3(2), 65-90.
[5] Myers-Smith, I. H., & Hik, D. S. (2018). Climate warming as a driver of tundra shrubline advance. Journal of Ecology, 106(2), 547-560.

are important for climate regulation, containing vast carbon reserves maintained in soil and under permafrost[6], as well as impacting local and regional weather patterns[7]. Protecting these ecosystems is important for their impact on global climate change and weather, and directing efforts towards the protection of snowy owl and other species reliant on these ecosystems will help in safeguarding the ecosystem.

AWA strongly supports the listing of Snowy Owls under the Species at Risk Act, and hopes it will provide greater protection and attention for the important tundra ecosystem.

Thank you for considering these comments. We look forward to hearing your decision.

Sincerely,

ALBERTA WILDERNESS ASSOCIATION



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Conservation Specialist

[6] Michaelson, G. J., Ping, C. L., & Kimble, J. M. (1996). Carbon storage and distribution in tundra soils of Arctic Alaska, USA. Arctic and Alpine Research, 28(4), 414-424.

[7] Lynch, A. H., Bonan, G. B., Chapin III, F. S., & Wu, W. (1999). Impact of tundra ecosystems on the surface energy budget and climate of Alaska. Journal of Geophysical Research: Atmospheres, 104(D6), 6647-6660.