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

September 28, 2026

Todd Loewen
Minister of Forestry and Parks
Government of Alberta
By email: FP.Minister@gov.ab.ca, Todd.Loewen@gov.ab.ca

RE: Recent changes to Alberta Wildlife Act and Wildlife Regulation

Dear Minister Loewen,

Alberta Wilderness Association (AWA) is writing to express our concerns about the recent changes to the *Wildlife Act* and *Wildlife Regulation*. Founded in 1965, AWA strives to help Albertans understand the intrinsic values that wilderness provides. We engage with communities 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 maintaining the health of our natural ecosystems.

The Wildlife (Joint Authority) Amendment Regulation (Order in Council 316/2026)[1], filed Sept. 17, 2026, lists several changes to Alberta's *Wildlife Act* and *Wildlife Regulation* that affect hunting and wildlife management in the province. Although we support some of the changes, including the requirement to report wolverines killed and the restrictions to hunting black bears along the highway, we do not find many of these changes to be in line with current science, and we request the reasoning behind these decisions.

We are particularly concerned with several of the changes:

- Using "a crop grown with the intention of attracting and hunting big game or game birds" as bait, and exempting this bait from restrictions and regulations.
- Allowing an independent police agency" to perform the work of wildlife officers or guardians.

[1] Wildlife (Joint Authority) Amendment Regulation. 2026. Government of Alberta. Available at: https://kings-printer.alberta.ca/Documents/Orders/Orders_in_Council/2026/2026_316.pdf

- Allowing general permissions to access private land and removing the requirement for explicit permission to guide on private land.
- Exempting wolves and big game meat for consumption from export limitations.
- Extending black bear hunting seasons in WMUs 400, 404, 406, and 408.

Exempting crops from the definition of bait

The Wildlife (Joint Authority) Amendment Regulation amends 3(f) of the Wildlife Regulation by adding that the definition of bait does not include "a crop grown with the intention of attracting and hunting big game or game birds."[2] This suggests that the use of crop attractants will no longer be restricted by limits on where bait can be used, or by regulations such as the requirement for signage.

Baiting can be unsafe and can cause extended population changes. It alters natural behaviour by providing an easy source of food, it can create a dependence on artificial food sources[3], and, as animals often gather in high densities around bait stations, it can encourage the spread of disease[4]. It can also cause a safety risk, as animals become accustomed to easy food or begin associating humans with food[5]. Signage was one method to improve safety, so allowing some baits to be exempt from these regulations presents a risk to both wildlife health and human safety.

Allowing independent agencies to perform the role of wildlife officials

The Wildlife (Joint Authority) Amendment Regulation adds "an office of an independent agency police service established under Part 3.2 of the *Police Act*" to the definition of "Service.[6]" An agency established under Part 3.2 of the *Police Act* is a private corporation, generally involved in security. This change allows these private corporations to take on some of the responsibilities of wildlife officials.

Wildlife officials are responsible for receiving reports of wildlife killed and for tracking the activities associated with licenses and guiding/outfitting, among other duties. By allowing private corporations to take over these responsibilities, transparency and accountability

[2] 316/2026 2(a).
[3] Dunkley, L., & Cattet, M. R. L. (2003). A comprehensive review of the ecological and human social effects of artificial feeding and baiting of wildlife. Canadian Cooperative Wildlife Health Centre: Newsletters & Publications, 21.
[4] Sorensen, A., van Beest, F. M., & Brook, R. K. (2014). Impacts of wildlife baiting and supplemental feeding on infectious disease transmission risk: a synthesis of knowledge. Preventive veterinary medicine, 113(4), 356-363.
[5] Lafferty, D. J., Trujillo, S. M., Hilderbrand, G. V., Sears, A., Christian, P., Payer, D., & Hake, M. (2024). Bear baiting risks and mitigations: An assessment using expert opinion analyses. Plos one, 19(11), e0312192.
[6] 316/2026 2(c).

will be more difficult to achieve. AWA believes that wildlife management should be science-based and transparent. As wildlife is a public resource, information collected on hunting and outfitting must be publicly available and management of this resource must be accountable to Albertans.

Explicit permissions to access private lands

Section 95(4) of the Wildlife Regulation is amended by removing "for the provision of those guiding services" from the requirement for permission to guide on private land. The Wildlife Regulation currently states, "A person shall not provide or cause to be provided guiding services on privately held land unless authorization for access to that land for the provision of those guiding services has been given by the owner or occupant of the land." Removing this line allows an outfitter that received permission to access private land to provide guided hunts on the land without disclosing to the landowner that they would be guiding clients.

This encourages guides to be less transparent and potentially obscure the fact that they intend to operate their guiding business on private land. It also presents a safety risk, as landowners may not be aware that those accessing their land are bringing additional parties for guided hunts. Hunting on private property was reported as one of the most common complaints reported to Fish and Wildlife Officers, according to a video and statement released by Fish and Wildlife[7], indicating that many landowners are already unhappy with the current lack of transparency.

Exemptions for exportation

Under the recent changes, wolves and "the butchered, cut up and packaged meat of lawfully killed big game for consumption" will now be exempt from section 59(1) of the *Wildlife Act*, which states, "A person shall not export wildlife from Alberta unless the person is so authorized by a permit specifically authorizing the exportation." This would allow wolves and big game meat to be exported without permits.

Removing restrictions on the export of these animals or animal parts opens our wildlife to greater exploitation, as hunters may be able to sell the fur or meat in other countries. This encourages more extensive hunting of Alberta wildlife for commercial purposes, as well as increases the risk of overexploitation of this wildlife by non-resident hunters or clients

[7] Hunting on private land - Alberta Fish and Wildlife Enforcement. 2019. Government of Alberta. https://www.youtube.com/watch?v=I1BMX-Ra4k0

expected to benefit from a relaxing of restrictions that would have otherwise kept these animals in the province.

Expansion of black bear season

In Wildlife Management Areas (WMU) 400, 404, 406, and 408, the general hunting season for black bears has been extended 16 days, ending on May 31 rather than May 15. This pushes the season later in the year, increasing the time during which bears experience additional stress from hunting pressure[8] and reducing the time for bears to forage without this pressure ahead of hibernation[9].

The black bear season was already extended in 2025. Further extensions continue to stress these animals, reducing the health of black bears and leading to lower reproductive rates. We have not seen any justification or scientific evidence to support this change, and request that any information available be provided.

The aforementioned changes appear to further open the province and its wildlife to exploitation, especially by guides and outfitters, and by non-resident hunters. We ask that these changes be reconsidered or suspended until justification for them is provided and a public consultation is held.

Thank you for considering our comments. We look forward to your response.

Sincerely,

ALBERTA WILDERNESS ASSOCIATION

Ruiping Luo

Ruiping Luo, Conservation Specialist

[8] Ordiz, A., Støen, O. G., Sæbø, S., Kindberg, J., Delibes, M., & Swenson, J. E. (2012). Do bears know they are being hunted?. Biological Conservation, 152, 21-28.
[9] Stillfried, M., Belant, J. L., Svoboda, N. J., Beyer, D. E., & Kramer-Schadt, S. (2015). When top predators become prey: black bears alter movement behaviour in response to hunting pressure. Behavioural processes, 120, 30-39.