



Alberta Fish & Game Association

6924 - 104 Street

Edmonton, AB T6K 1T8

Phone: (780) 437-2342 Fax: (780) 438-6872
email: office@afga.org Website: www.afga.org

Alberta Fish and Game Association (AFGA) Position On Game Farming In Alberta

February 2004

During recent annual conventions and meetings of the Alberta Fish and Game Association, a number of issues have been brought forward and discussed with regard to game farming. All discussion has added to and supported the 1991 policy of the AFGA that indicated the following,

“The Alberta Fish and Game Association is strongly opposed to Game Ranching in Alberta. Our Association believes that game farming and ranching will be the biggest threat to wildlife, hunting and recreation in this province. We must move to phase out the existing game farms and ranches and ensure that no new game farms or ranches are developed.

Although there are provisions in the Wildlife Act (1984) that prohibit hunting on game ranches and prohibit the use of crown land, we feel that in the future, crown lands will be opened up for game ranches and hunting will be allowed or methods devised to circumvent the prohibitions.”

The latter part of this policy was tested when the game farming industry unsuccessfully attempted to legalize Cervid Harvest Preserves in Alberta in 2001-2002.

The AFGA represents organized Alberta sportspersons who both appreciate and use Alberta's wildlife resources for a variety of purposes, including hunting, fishing, viewing, photography, and other activities associated with nature appreciation. AFGA members therefore have a passionate interest in wildlife and therefore act in various forms as a voice for the conservation, protection from decline, and preservation of diversity and health of Alberta's fish and wildlife resource and its supporting habitat. In addition, it acts to assure reasonable access to the resource for the purposes stated.

The AFGA understands the need to use Alberta's natural resources for the benefit of society in general but we do not agree with the privatization or domesticating of Alberta's wildlife. The AFGA has identified and explained the following concerns and conflicts that some of the activities associated with the game farming industry have on the wildlife resource, its supporting habitat, and the public access to the resource.

The Issues

1.0 Disease

Our Association has long had a concern that raising game-ranched wildlife would open the doors to disease among those animals and increase the possibility of disease transmissions from game-ranched animals to our Province's wild stocks of deer and elk and possibly livestock and humans. There are serious threats to Alberta's wildlife from disease agents, such as moose ticks, chronic wasting disease, brain worm, lung worm, giant liver fluke, tuberculosis, etc. Concerns over some of these diseases have already been proven to be legitimate to some degree.

Unnatural Densities

The high concentration of ungulates on game farms establishes unnatural densities of animals and in so doing, alters the disease dynamics. Natural populations have densities that are considered to be very high at 14 to 16 animals per square mile. On many game farms the densities may involve over 300 animals per square mile. The AAFRD website dated February 18, 2004 regarding background information on CWD states "The disease seems more likely to occur in areas where deer and elk are crowded or where they congregate at man-made feed and water stations. Artificial feeding of deer and elk may compound the problem.

Tuberculosis

In the late 1980's and the early 1990's tuberculosis (TB) ravaged elk raised on game ranches in Alberta. That particular incident resulted in over 3,300 game-ranched animals being put down at a cost of approximately \$25 million to taxpayers. It also led to over 40 people being treated for exposure to TB and it prevented Canada from achieving its TB free status on the world market, which cost the cattle industry potentially millions of dollars. Some 26 elk are still unaccounted for that went missing during the TB epidemic, either because they escaped or because of poorly kept records from some of the game ranches involved. At the time, the Alberta Fish and Wildlife Division issued a press release in the regulated hunting season to warn hunters about the missing animals and advising of the risks of TB if a hunter shot an ear-tagged elk, which had escaped from a game ranch.

Chronic Wasting Disease (CWD)

More recently in Saskatchewan, Chronic Wasting Disease (CWD) has been a very real problem and has resulted in over 8,400 game-ranched animals being put down costing Canadian taxpayers approximately \$65 million in the past three years. CWD has also been found in over 30 wild mule deer in Saskatchewan in the past three years, many within close proximity to the Alberta border. It is believed by many that initially these wild deer contracted the disease from an infected game ranch, as there had never been a reported or documented case of CWD in the wild in Canada-prior to its discovery on game farms.

As a result of the first positive test of CWD in the wild, both the Alberta and Saskatchewan governments took the unprecedented step of initiating a kill for wild deer along the border in the spring of 2001. **Officers shot approximately 250 deer** in each province consisting of bucks, yearlings and pregnant does of both mule deer and white-tailed deer species. Tests on those animals thankfully resulted in no positive CWD cases in Alberta, however, one more positive case did turn up in Saskatchewan which caused the Saskatchewan government to attempt a massive kill of wild deer that fall targeting a kill of 60 to 70% of the deer population in some areas (sustaining current populations of deer are usually based on approximately 8 to 12% harvest rates). This kill did not result in a very good harvest and caused **many landowners to post their land and close it to hunting** altogether and it also caused the public perception of traditional hunting and hunters to decline in those areas.

In 2002 The Canadian Food Inspection Agency (CFIA) announced that it had eradicated CWD in Saskatchewan on game ranches and that all trace-outs had been eliminated. Unfortunately, shortly after the CFIA announcement another positive case turned up on a game farm/hunt farm which was believed to be unrelated to the previous trace-outs. This ranch had 350 animals on it which were put down at taxpayers' expense and a new search for trace-outs from this bloodline began with the end result being more animals put down again at taxpayers' expense. Saskatchewan has also put down approximately 200 cattle and 100 bison that were on a previously CWD infected ranch. This was done as a precautionary measure as it is not known for sure yet whether CWD can cross the species barrier to livestock or possibly humans. Remember that it was originally believed that BSE or Mad Cow Disease (the CWD of cattle) would not cross the species barrier to humans but it eventually did and many died. The AAFRD website further states "There is currently no scientific evidence to suggest that CWD is naturally transmissible to humans or livestock" and "Scientific evidence suggests that it is unlikely that CWD can be passed to domestic cattle or bison under natural conditions.

CWD has also been confirmed on Alberta game ranches. One elk and two deer have tested positive and as a result, numerous game farm elk and deer have been killed and nearly **600 wild deer were also killed by government personnel**. These are not only lost opportunities for hunters but also negative to the wildlife population in the local area. In a letter dated January 21, 2004 from the Honorable Mike Cardinal, Minister of Alberta Sustainable Resource Development regarding the above wild deer reduction and the one in 2001 to test for CWD he states "SRD has done this twice and the cost of biological and enforcement staff is in the range of \$350,000... and in the range of 500 man-days for each collection project."

2.0 Displacement of Wildlife

In order for the 9 foot high fences of a game farm to be installed, the wildlife that currently live on the property must be chased out. Game farms displace wildlife from their home and force them onto adjacent properties upsetting the natural balance of wildlife on those properties and placing additional stress on the wildlife and its habitat and the carrying capacity of the land.

Game farms reduce Alberta's wildlife population through displacement.

3.0 Habitat Removal

Game farms remove habitat from the natural ecosystem. Some game farms fence off prime wildlife habitat, which can no longer be used by natural wildlife because of the 9-foot high fence. As a result, these game farms effectively remove or alter the natural habitat system that wildlife depends upon for its existence.

Game farms reduce landscapes that are available wildlife habitats.

4.0 Wildlife Corridors

The high fences put up around game farms further contribute to the blocking of traditional wildlife corridors and access to food, water and cover for wildlife. Game farm fences have a large impact on these wildlife corridors, especially those situated in areas of prime wildlife habitat. Wildlife now has to go around these fences to access other areas of food, water and cover. This increases the exposure of wildlife to new predators that they may not have had contact with before and includes crossing roads resulting in a higher incidence of vehicle encounters.

Game farms influence and restrict the free movement of wildlife.

5.0 Game Farm Animal Escapes and Recaptures

The number of escaped animals is major evidence suggesting that wildlife are at risk. During the past 15 years, numerous escaped game farm animals have been confirmed by both Alberta Agriculture (AAFRD) and Alberta Sustainable Resource Development (ASRD) (Table: Escapes). The numbers identified by the government agencies did differ and this also concerns the AFGA.

Table 1: Number of game farm animal escapes, recaptures and unaccounted for during the past 15 years (AAFRD) and 4 years (ASRD)

Measurement Item	Agriculture (AAFRD) 15 years	Sustainable Resource Development (ASRD) 4 years
# of incidents of escapes	46	*50
# of animals escaped	317	328
# of animals recaptured	177	124
# of animals unaccounted	140	204

*Reported Incidents, could be reported more than once

Minister Cardinal’s previously mentioned letter also states “Other CWD related occurrences add an additional \$8,000 to \$10,000 and 40-50 man-days on an annual basis including activities associated with the escape of farmed cervids.”

Numerous escapes of game farm animals place Alberta’s wildlife at risk.

6.0 Wild Animal Entries and Releases

The number of wild animal entries is major evidence suggesting that wildlife are at risk. During the past 15 years, numerous entries of wild animals have been confirmed by Alberta Sustainable Resource Development (ASRD) (Table: 2). The numbers of entries were not recorded by AAFRD and this also concerns the AFGA. It is unclear who has the responsibility within the provincial government to inspect these farms and to address releases back to the wild-or to destroy the wild entries into game farms.

Table 2: Number of wild animal entries, releases and unaccounted for during the past 15 years (AAFRD) and 4 years (ASRD)

Measurement Item	Agriculture (AAFRD) 15 years	Sustainable Resource Development (ASRD) 4 years
# of incidents of entries	No information	*71
# of animals released	No information	360
# of animals recaptured	No information	150

# of animals unaccounted	No information	210
--------------------------	----------------	-----

*Reported Incidents, could be reported more than once

Numerous entries of wild animals into game farms place Alberta's wildlife at risk.

7.0 Enforcement

There appears to be considerable confusion as to who is enforcing the regulations associated with game farm animal escapes and entries. For example, in some areas when ear-tagged animals are observed the action is to kill all of them while in other areas such action is not taken. This appears to be inconsistent action. Clarification is requested.

Inconsistent enforcement and policies/guidelines to enforcement on escaped game farm animals places an increased risk on wildlife.

8.0 CWD and BSE

The connection between CWD and BSE is very close. Both are brain and nervous system diseases caused by prions. The capability of these prions to adapt or mutate and possibly transfer from cervids (deer family) to bovids (cattle family) or to humans is a concern. The ramifications of the recent BSE discovery on the lives of Albertans and Canadians should provide a lesson of concern. Precautionary action should be implemented to reduce the possible risk.

CWD differs from BSE in that the young animals may also contract the disease and the method of transfer from animal to animal may be through contact rather than ingestion of diseased tissue. The possible connection between CWD and BSE and the eventual transfer to cattle or the transfer to wildlife is a major concern.

The possible connection between CWD and BSE and the possible spread from wildlife to cattle or cattle to wildlife is clearly a risk to wildlife and to traditional agriculture.

9.0 Public Perception

Alberta currently has almost twice as many elk on game ranches as it does in the wild (452 farms and 44,142 elk in October 2003). If Alberta continues to increase the operations and privatize our wildlife, what will happen to the reverence that the public now has for wildlife? We believe that in the future that reverence will diminish and wildlife will eventually lose its place of stature in the environment and be seen as a commodity to be bought, sold and shot by the person who is wealthy. If disease should get into our wild stocks then that reverence would crash rapidly and the revenue that businesses and the government now earn from those that go out to view, photograph or hunt wildlife would cease.

Public perception of unhealthy wildlife may place our wildlife at risk for fear of spreading disease.

Summary:

Game farms cause an increased risk to the long-term health of Alberta's wildlife. The following list of concerns defines and substantiates the need for government action.

- **High concentration of ungulates on game farms establishes unnatural densities vulnerable to disease.**
- **Over 3,300 game-ranched animals were put down at a cost of approximately \$25 million to taxpayers in the early 1990's- due to T.B.**
- **Three game farm animals have tested positive for CWD in Alberta. No wild animals have tested positive for CWD in Alberta. Saskatchewan has confirmed CWD in over 30 wild animals- and on over 40 game farms.**
- **Approximately 600 wild deer were killed by government personnel around game farms that were infected with CWD.**
- **Game farms reduce Alberta's wildlife population through displacement.**
- **Game farms reduce landscapes that are available as wildlife habitats.**
- **Game farms influence and restrict the free movement of wildlife.**
- **Numerous escapes of game farm animals place Alberta's wildlife at risk.**
- **Numerous entries of wild animals into game farms place Alberta's wildlife at risk.**
- **Inconsistent enforcement and policies/guidelines to enforcement on escaped game farm animals places an increased risk on wildlife.**
- **The possible connection between CWD and BSE and the possible spread from wildlife to cattle or cattle to wildlife is clearly a risk to wildlife and to traditional agriculture.**
- **Public perception of unhealthy wildlife may place our wildlife at risk for fear of spreading disease.**

The Alberta Fish and Game Association has always been opposed to the concept of game farming of Alberta's native species. We will continue in our endeavors to completely stop such practices and to legally remove existing game farms from the Alberta landscape!

The AFGA believes our wildlife are at risk!

AFGA
February 2004