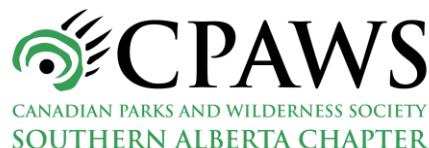
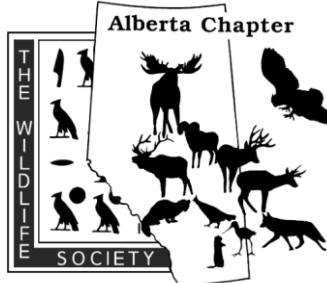
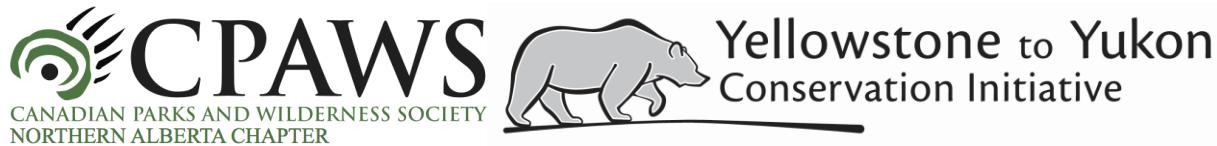




Alberta Wilderness Association



FOOTHILLS  
BISON  
RESTORATION  
SOCIETY



March 15, 2024

The Honourable Rebecca Schulz  
Minister of Environment and Protected Areas  
204 Legislature Building 10800 - 97 Avenue Edmonton, AB T5K 2B6  
By Email: [aep.minister@gov.ab.ca](mailto:aep.minister@gov.ab.ca)

The Honourable Rick Wilson  
Minister of Indigenous Relations  
104 Legislature Building 10800 - 97 Avenue Edmonton, AB T5K 2B6  
By Email: [ir.ministeroffice@gov.ab.ca](mailto:ir.ministeroffice@gov.ab.ca)

### Bison designation in Alberta

Dear Minister Schulz and Minister Wilson,

We are writing to request your support for the reclassification of free-ranging bison as 'wildlife' under the *Alberta Wildlife Act*. This important change would recognize their vital role in the ecosystem, provide protection for wandering herds, and acknowledge the cultural and historic significance for Indigenous communities. Reclassification would also align Alberta with the neighbouring provinces of Saskatchewan and British Columbia, where bison are already recognized as wildlife.

American bison (*Bison bison*), also known as buffalo, *iinnii* (in Blackfoot) or *Tatâga* (in Stoney Nakoda), are a keystone species, critical to the health and long-term sustainability of ecosystems, particularly in the prairie region. Their movement, grazing, wallowing and other behaviours support the creation of distinct habitats, promoting plant and animal biodiversity and encouraging ecosystem resiliency. Unlike cattle, which are domesticated and an introduced species, bison evolved as a part of the grasslands and open woodlands of the boreal forest. The current classification of plains bison and wood bison outside

designated Wildlife Management Units (WMUs) as domesticated livestock fails to recognize their integral role within the ecosystem.

Bison are also a culturally significant species to many Indigenous communities. Their restoration to the landscape to date has been immensely beneficial to cultural healing and revitalization. Recognizing them as wildlife acknowledges this significance, strengthens connections to traditional lands and fosters collaboration. Excluding bison from the *Wildlife Act* has undermined the impact by limiting movement and re-establishment of free-ranging animals, and without allowing bison to return to the landscape, genuine reconciliation will be difficult.

The lack of legislated protection threatens meaningful bison reintroduction, and subsequently, meaningful ecosystem protection and revitalization. It hinders the implementation of effective protection measures and complicates management plans. In addition, their categorization outside specific Wildlife Management Units (WMUs) and protected zones as livestock creates confusion and can complicate collaboration and conflict management with other land users. Bison can coexist with farming and ranching communities, and concerns from landowners and ranchers can be effectively addressed. For instance, there are collaborations for bison management with the landowners surrounding Prince Albert National Park. Designating them as ‘wildlife’ across the province would simplify management and strengthen conservation and reintroduction efforts.

We appreciate the protection provided by the status amendment for wood bison and the creation of protected regions, such as the Northwest and Wabasca Bison Protection Areas and the Upper Red Deer River Special Bison Area. However, this protection needs to be extended. The reintroduction of bison, a critical endeavour for restoring grassland health and reconciliation, is occurring throughout North America. Many of these reintroductions are of free-ranging bison herds. Expansion of the bison population is a cause for celebration, though increasing herd sizes make it more likely that bison will wander outside designated reintroduction zones or across borders. Alberta needs to be prepared to manage these herds.

Designating plains and wood bison as ‘wildlife’ under the *Alberta Wildlife Act* is long overdue, and is vital for effective management, conservation and recognition of bison on the Alberta landscape. As Minister of Environment and Protected Areas and Minister of Indigenous Affairs, your respective ministries have the responsibility to protect Alberta’s biodiversity and ecosystem health, and work towards meaningful reconciliation with Indigenous communities. Bison, as both a keystone species and strong cultural symbol, are crucial to maintaining ecological health and supporting Indigenous healing.

We would be willing to meet with you to further discuss the importance of bison and their designation, and look forward to hearing from you.

Sincerely,

**Alberta Wilderness Association**

Ruiping Luo, Conservation Specialist

Deborah Donnelly, Executive Director

**Southern Alberta Group for the Environment**

Braum Barber, Director

**Foothills Bison Restoration Society**

Mike Judd, President

**Canadian Parks and Wildlife Society**

Kecia Kerr, Executive Director, Northern Alberta Chapter

Katie Morrison, Executive Director, Southern Alberta Chapter

**Yellowstone to Yukon Conservation Initiative**

Nicole Olivier, Manager of Landscape Protection

Tim Burkhart, Director of Landscape Protection

**Alberta Chapter of the Wildlife Society**

Stan Boutin, President

Shantel Carels, Executive Director

CC: Sue Cotterill, Director, Species at Risk and Stewardship, Environment and Protected Areas

Brandy Downey, Wildlife Manager, South Region, Alberta Environment and Protected Areas

Craig Johnson, Regional Director, South Region, Alberta Environment and Protected Areas

William Snow, Acting Director of Consultation, Stoney Tribal Administration

Leroy Little Bear, Vice Provost, Iniskim Indigenous Relations, University of Lethbridge

## BACKGROUND

In Canada, the American bison is composed of two subspecies: plains bison (*Bison bison bison*) and wood bison (*Bison bison athabascae*). Bison once roamed through much of Alberta and the Great Plains of North America, numbering in the tens of millions. Their numbers declined precipitously after the arrival of European settlers, due to hunting, development and conversion of native grassland for agriculture. By the 1800s, plains bison had been extirpated from Canada, and only an estimated 200 wood bison remained.

Bison are revered as a culturally significant species by First Nations across North America. The bison is remembered in creation stories, and have featured in teachings from Elders to Indigenous communities for thousands of years. Prior to colonization, bison were utilized as a major source of food, clothing and shelter, and were, and still are, utilized in ceremonies throughout Indigenous communities. The cultural connection that bison provide to Indigenous communities remains alive today.

As of 2024, semi-wild plains bison herds have been reintroduced to a number of areas, including Elk Island National Park, Waterton National Park and Banff National Park, and well as on the lands of many Indigenous nations. There are currently six wood bison subpopulations at Wood Buffalo National Park, Elk Island National Park, Ronald Lake, Wentzel/Wabasca, Hay Zama and Etthithun.

In 2014, the historic Buffalo Treaty was first signed by First Nations in Alberta and the United States, aimed at returning bison to the land. Since then, it has been signed by over 30 Indigenous nations.<sup>1</sup>

In 2016, a resolution was passed by the signatories of the Buffalo Treaty. The resolution acknowledged bison as a keystone species and foundational to Indigenous culture, and asked for the Government of Alberta to “1. provide for bison to be treated as wildlife along the province's Eastern Slopes, 2. to reintroduce wild plains bison as an ecological process on provincial conservation lands, 3. support the efforts of First Nation who wish to have free ranging bison on their lands, 4. work with Parks Canada to ensure wide ranging population of wild plains bison are welcome on provincial lands adjacent to National Parks.”<sup>2</sup> The Calgary Herald reported that Alberta was already working to change the status of bison, and was expecting the process to be completed by 2017.<sup>3</sup>

In 2017, Plains Bison were reintroduced to Banff National Park, with the cooperation of several First Nations from Treaty 7 and Treaty 8, as well as Métis Nation 3. The initial 16 head introduced from Elk Island National Park has grown to over 100 head of bison that are thriving on the land. In 2022, the Stoney Nakoda First Nations completed a cultural wildlife report on the Banff herd, titled *Enhancing the Reintroduction of Plains Bison in Banff National Park Through Cultural Monitoring and Traditional Knowledge*. This report speaks to the cultural importance of bison, and offers 11 recommendations on

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<sup>1</sup> Buffalo Treaty. [n.d.] Retrieved February 14, 2024 from: <https://www.buffalotreaty.com/>

<sup>2</sup> 2016 Buffalo Treaty Alberta Wildlife Bison letter and resolution signed. (2016, September 29). *Buffalo Treaty*. Retrieved February 14 from:

<https://static1.squarespace.com/static/5e5fe077316ef31fa3aa0210/t/5e67227bb2fd91655fc3c4bf/1583817340118/2016+Buffalo+Treaty+Alberta+Wildlife+Bison+letter+and+resolution+signed.pdf>

<sup>3</sup> Derworiz, C. (2016, October 3). First Nations call on Alberta to classify Plains Bison as wildlife. Calgary Herald. Retrieved February 14, 2024 from: <https://calgaryherald.com/news/local-news/first-nations-call-on-alberta-to-classify-plains-bison-as-wildlife>

bison management. Recommendation #5 states, “The Province of Alberta should designate plains bison as “wildlife” in a defined provincial reintroduction area”.<sup>4</sup>

In 2018, Shannon Phillips, Minister of Environment and Parks, signed a Ministerial Order to establish the Upper Red Deer River Special Bison Area, where bison wandering away from Banff National Park would be protected.<sup>5</sup> The Ministerial Order came after repeated calls for plains bison to be designated wildlife, and was signed after two bison had already roamed outside the park, although the Minister denied the order was related to these incidents. Minister Phillips also stated the committee was reviewing the status of bison in Alberta, which could conclude the animal should be protected provincewide.<sup>6</sup>

In 2021, Alberta officially designated wood bison as ‘wildlife’, although only within specified Wildlife Management Units (WMUs) in northern Alberta. This change protects wood bison populations within the region from hunting. The species was also listed as ‘Threatened’, with the Government of Alberta making the decision “based on an assessment of Alberta’s wood bison risk of extinction.”<sup>7</sup> Plains bison are still not listed under the *Alberta Wildlife Act* and outside these WMUs, free-ranging wood bison are considered livestock, even though they are wild, unowned animals.

In 2023, the Aamsskáápipikani or Montana Blackfeet Nation released a herd of free-ranging bison near Chief Mountain and just south of the Canadian border. It was expected these bison would roam into Glacier National Park, Waterton Lakes National Park and Kainai Nation lands. These bison were to be treated as wildlife.<sup>8</sup> However, logistical difficulties arose, including wandering of bison into Canada outside of allocated regions, where they were not protected. With the increase in bison reintroduction and the increasing acknowledgement of their role on the ecosystem, Alberta needs a clear designation and management plan for wild bison.

Federally, plains bison were assessed by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) as ‘Threatened’ in 2013, although the species was not listed under the *Species at Risk Act* (SARA) due to commercial interests. The status of plains bison is currently under review. Wood bison are listed as ‘Threatened’ under SARA. Bison are classified as wildlife in British Columbia and Saskatchewan.

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<sup>4</sup> Snow, W., Francis, G., Wesley, L., Holloway, H., Powderface, C., Rabbit, C. & Snow, H. (2022). Enhancing the Reintroduction of Plains Bison in Banff National Park Through Cultural Monitoring and Traditional Knowledge—Final Report and Recommendations. Canadian Mountain Network.

<sup>5</sup> Government of Alberta. (2018, September 15). Wildlife (Upper Red Deer River Special Bison Area - Ministerial) Amendment Regulation: The Alberta Gazette, Part II. Retrieved February 14, 2024 from: [https://kings-printer.alberta.ca/documents/gazette/2018/pdf/17\\_Sep15\\_Part2.pdf](https://kings-printer.alberta.ca/documents/gazette/2018/pdf/17_Sep15_Part2.pdf)

<sup>6</sup> CBC News Calgary. (2018, August 21). Bison now protected on strip of public land adjacent to Banff National Park. CBC News. Retrieved February 14, 2024 from: <https://www.cbc.ca/news/canada/calgary/bison-protection-ministerial-order-alberta-1.4793335>

<sup>7</sup> Government of Alberta. (2021, November). Wood Bison Status Changes in Alberta. Retrieved February 14, 2024 from: <https://open.alberta.ca/dataset/7e7a3c4e-f2a6-4b21-b329-8d8cebc5ea34/resource/1203bf27-fdec-4b97-a5bc-50fe2d77a6d6/download/aep-wood-bison-status-changes-2021-11.pdf>

<sup>8</sup> Planas, R. (2023, July 6). The Blackfeet Are Freeing Wild Bison Back Onto Native Lands After Centuries Of Devastation. Huffpost. Retrieved February 15, 2024 from: [https://www.huffpost.com/entry/blackfeet-tribe-wild-bison-release-land\\_n\\_64a6df84e4b07252cc101cae](https://www.huffpost.com/entry/blackfeet-tribe-wild-bison-release-land_n_64a6df84e4b07252cc101cae)