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October 20, 2023

Indigenous Affairs Branch
30 Victoria Street (PC-05-D)
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Parks Canada National Office
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Jasper National Park
PO Box 10
Jasper, Alberta
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Via EMAIL at aboriginal.autochtones@pc.gc.ca; information@pc.gc.ca;
pnj.jnp@pc.gc.ca

Dear Sir or Madame,

RE: Simpcw and Stoney First Nation Hunt – Jasper National Park

We, the Wild Sheep Foundation of Alberta (“**WSFAB**”, or “**we**”), are writing Parks Canada to express our grave concerns with the announcement that Parks Canada has worked out a deal with the Simpcw and Stoney first nations to allow for hunting in Jasper National Park (“**Jasper**”). Sections of the park are scheduled to be closed October 23, 2023 to November 13, 2023. Whether firm harvest limits have been established or not we do not know. A similar hunt took place by the Simpcw in Jasper in 2017. In 2017, one mule deer, three whitetail deer, three bighorn sheep and three elk were killed in the park.

We would like to know if Parks Canada has established harvest limits for the October/November 2023 hunt and whether more hunts in Jasper are planned for the future.

The *Canada National Parks Act* creates a general prohibition on hunting in national parks. While there are certain exceptions to the general prohibition for certain first nations and certain national parks, there is no clear exception which is applicable to the Simpcw and Stoney hunting in Jasper. Therefore, as a preliminary matter, WSFAB is struggling to understand how the proposed hunt does not contravene the law. We understand that that the *Constitution Act 1982* provides broad protections and rights for the aboriginal peoples of Canada, but the closing of a national park for the use by one group of people, to the exclusion of others does not align with these general protections and rights. The introduction to the *Canada National Parks Act* states that the parks are dedicated to the public; in part, Section 4(1) reads: “The national parks of Canada are hereby dedicated to the people of Canada for their benefit, education and enjoyment.” This is the underpinning principle of the

entire national parks system. The parks are for Canadians to enjoy – not some Canadians, all Canadians.

We would like Parks Canada to provide the detailed and specific reasoning that they believe the proposed hunt is permitted under the law.

Jasper itself is a shining beacon of the natural beauty of Canada. It is home to untouched and remote wilderness and is a cherished treasure of all Albertans. The park serves as a wilderness reserve for many threatened and sensitive species. The woodland caribou, for example, makes its home in Jasper. The protections provided to the caribou within the national park are critical to its survival. Conservation and science go hand-in-hand with Canada's national parks. It is Parks Canada and its staff who are charged with the stewardship and protection of the national parks and their wildlife. Parks Canada's own mandate states "On behalf of the people of Canada, we protect and present nationally significant examples of Canada's natural and cultural heritage and foster public understanding, appreciation and enjoyment in ways that ensure their ecological and commemorative integrity for present and future generations." Furthermore, Parks Canada's Charter states that they are the guardians of the national parks and that they have the commitment "to protect as a first priority the natural and cultural heritage of our special places and ensure that they remain healthy and whole."

We would like Parks Canada to demonstrate how allowing hunting in Jasper upholds the values of their charter and their duty to protect the parks for the people of Canada.

We also question what the need is to allow the Simpcw and Stoney to hunt in the park in the first place. In addition to the Simpcw and Stoney's own reserve land, there are 100,000,000 acres of Crown land to hunt on in Alberta and 85% of Alberta's parks systems provide hunting opportunities. In fact, there are more opportunities to hunt on easily accessible public land in Alberta than perhaps any other jurisdiction in the world. Simply put, there is no shortage of places to hunt in Alberta. We do not understand the need to hunt in a national park which is specifically designated as wilderness reserve protected from hunting.

We would like Parks Canada to provide their reasoning that the 100,000,000 acres available for hunting in Alberta is not enough for the Simpcw and Stoney and that they need to hunt in a national park.

With great respect we acknowledge and revere the importance of aboriginal peoples' traditional hunting heritage. Yet, we must consider that big game animals in Jasper are habituated to humans. In many cases, sheep and elk in Jasper are tame. We ask whether shooting a tame animal, outside of a regulated hunting season, in a national park, with a rifle is a 'traditional hunt'? We also note that some of the biggest bull elk and bighorn sheep rams on the entire continent frequent the roadside ditches in Jasper. We ask is the proposed hunt a trophy hunt or is it a traditional sustenance hunt?

We would like Parks Canada to provide their considerations for what trophy animals will be killed in Jasper and whether any sustenance hunting will occur at all.

The current government has made reconciliation with first nations a major priority. We acknowledge and revere the importance of reconciliation between first nations people and the Federal Government, yet we do not understand how allowing hunting in a national park in any way achieves any measure of reconciliation. What we do understand is that closing a national park serves a negative purpose for Canadian citizens as a whole. It restricts park enjoyment opportunities from citizens, and reduces Canada's wildlife and natural resources. While the Liberal Government may consider *carte blanche* hunting for first nations a win for

them politically, it is a loss for Canadian citizens as a whole. It is also a loss for the relationship between Canadian citizens and first nations.

We would like Parks Canada to provide their considerations for whether allowing first nations to hunt in a national park creates the greatest good for the greatest number of people or just creates the greatest good for Parks Canada.

There are five national parks in Alberta. First nations already hunt in Wood Buffalo National Park and now first nations will be hunting again in Jasper. We are concerned about the precedent the Jasper hunt sets and how it opens the door to hunt in the remaining three national parks in Alberta, being Waterton Lakes National Park (“**Waterton**”), Banff National Park (“**Banff**”) and Elk Island National Park (“**Elk Island**”). We do not understand how Parks Canada would allow the Simpcw and Stoney to hunt in Jasper but disallow first nations hunting in another national park. Logic would dictate that the former necessitates the latter. If hunting in all of Alberta’s national parks is allowed, it would truly defeat the whole purpose of the national parks system and be nothing short of a tragedy.

We would like to know whether Parks Canada has considered the precedent the Jasper hunt sets and whether there are any plans for first nations to hunt in Waterton, Banff or Elk Island.

We ask Parks Canada to think critically about what its role is with respect to managing Canada’s wildlife and environment. We ask Parks Canada to think critically about its role as a steward for Canada’s national parks for all Canadians, not just certain Canadians. Most importantly, we ask Parks Canada to think critically about what the ethos of a national park should be. Are national parks for the enjoyment of Canadians as a whole? Or are national parks for the enjoyment of select individuals? It cannot be both of these things at once.

Yours truly,

The Wild Sheep Foundation of Alberta

James Bartlett, Director