I do not intend to speak specifically on elk ranching but instead will be directing my comments on game ranching in general. The comments and concerns expressed, however, will no doubt be applicable to elk ranching.

From an enforcement point of view, we are very concerned about the impact of game ranching on the wild resource. This material was not prepared to propose solutions or safeguards, but rather to raise the questions and suggest that if we are to proceed, it must be with caution.

The Fish and Wildlife Policy for Alberta provides that the Fish and Wildlife Division will encourage an environment which fosters the development of a domestic wildlife farming industry and a game ranching industry on private land and Metis Settlements. This objective is to be accomplished through:

1) the provision of a permit for the purpose of transporting and retaining wildlife;
2) the provision for capturing breeding stock from the wild under the authority of a permit;
3) the development of criteria for the conditions of captivity and sale of wildlife managed under farming or ranching licences.

In the broadest terms, there are three obstacles to the establishment of viable wildlife farms and ranches, and these might best be identified as philosophical, regulatory and enforcement.

Before providing detail in these regards, it might be best to consider the history of the current legislation, specifically the Game Bird Farm Regulations, the Big Game Farm Regulations and the Pheasant Shooting Ground Regulations.

Fish and Wildlife records indicate that there were few provisions with respect of wildlife farming prior to 1958 and those that did exist were made under the Game Act. In February of 1958, the Game Bird Farm Regulations came into being. These regulations dealt exclusively with game birds and provided mainly for their import, their being kept captive, released to the wild and export. In July of 1959, the Big Game Farm Regulations were passed and provided for, in essence, private zoos. Provisions for barter and exchange of animals were only made for licencees.
or zoological gardens financed wholly or partly by public funds. September of 1965 saw the establishment of a Controlled Pheasant Shooting Ground Regulation.

Game bird farm regulations have been modified over time to provide for sale of table-ready pheasants. That, coupled with the advent of pheasant shooting grounds some years ago, suggests that commercialization of at least some forms of wildlife is acceptable to the general public.

Perhaps, this provides an appropriate lead-in to discussion of the philosophical barriers to wildlife farming in a true agricultural sense.

PHILOSOPHICAL CONCERNS

The philosophical barrier has, perhaps, five facets. The most significant of these, in my view, is the suggestion that farming and ranching of wild animals degrades wildlife. Large segments of the public subscribe to the belief that wildlife should remain wild.

The second aspect of the philosophical question is in respect of the right of property in wildlife. Alberta's Wildlife Act has provided and will continue to provide that the right of property in wildlife is vested in the Crown in the right of the province. Game farming and ranching cannot become viable industries unless the farmer or rancher owns the wildlife he produces. Therefore, provision is necessary to transfer the right of property in wildlife. This can be accomplished in various ways. Perhaps, we should legislate that wildlife collected from the wild remains the property of the Crown and that it be leased for breeding purposes. Further provision could then be made that progeny becomes the property of the producer.

Genetic matters are another element of the philosophical concern. These matters will, no doubt, be dealt with by others during this workshop. Suffice it to say that once the specifics of the matter are determined, legislation will have to be developed to provide against what is unacceptable.

While pheasant shooting grounds have not been vigorously opposed, much opposition to the concept of "paid hunting" of big game already exists. The Wildlife Policy for Alberta has addressed these concerns by supporting only the hunting of captively reared game birds. Conformity with that stated Policy is essential to gaining a measure of public support.

Finally, it would seem the hunting fraternity has some concerns respecting the possibility of trophy production from game farms and ranches. This is somewhat ironic as it represents the absolute opposite to a point that will be raised later as we discuss enforcement. The fear being voiced by the sportsman is that Boone and Crockett records may ultimately be held by those who procured their trophy through a game farm or ranch rather than by taking it under the fair chase concept.
The philosophical aspects of game ranching are, no doubt, much broader than those outlined above. The foregoing is a summary of the concerns voiced most often since the Fish and Wildlife Policy for Alberta was released to the public.

REGULATORY CONCERNS

The regulatory and enforcement issues might be somewhat difficult to separate. By "regulatory", I mean the creation of the legislation necessary to govern game farming and ranching while by "enforcement", I mean the application of that legislation.

At the outset, I paraphrased a portion of the Wildlife Policy of the Fish and Wildlife Policy for Alberta that indicated that these industries would be encouraged by providing authorization to hold wildlife on farms and ranches, providing for the capture of breeding stock, and permitting sale of produce. Unfortunately, that is an over-simplification of what needs to be done.

It is interesting to note that the Game Branch first came into being under the Department of Agriculture, and when it was separated from that Department, the Department of Agriculture retained the legislative and administrative authorities over fur farming. There is, therefore, a school of thought that game farming and ranching should be similarly arranged. It is worth noting here that fur farming is facilitated through provisions for collection of breeding stock made under the Wild Fur Industry Regulations which are made pursuant to the Wildlife Act.

The business of livestock production is one which is regulated by both federal and provincial law. Health of animals is, to a large degree, the responsibility of the federal government. The Animal Disease and Protection Act and its regulations are the responsibility of the federal government, and ultimately, these regulations will have to provide for wildlife that is produced on game farms or ranches. It is interesting to note that the Animal Disease and Protection Act provides an authority to make regulations in respect of health of animals for zoos and game farms. I am not aware that any such regulations have been made but suggest that they will be essential if significant game farming and ranching operations are developed within this province or elsewhere in Canada.

On the provincial side, statutes such as the Stray Animals Act and the Livestock and Livestock Products Act will have to be modified or regulations made under them will have to be amended to provide for and accommodate domestic ranching of wildlife. For example, it may be difficult to tell tame elk from the wild one unless they are clearly branded. Those producing wildlife on farms or zoos and for other display purposes will be reluctant to brand their animals.

Since the release of the Fish and Wildlife Policy for Alberta, the question of humane treatment of animals on game farms and ranches has been raised repeatedly. There are those that insist that special provisions in this regard must be incorporated in any regulations that we generate to
govern game farming and ranching while others maintain that provisions of this nature should be found in the Animal Protection Act and/or the Criminal Code of Canada.

The point I am trying to make, is that once game farms and ranches are established by the three initiatives set out at the outset, perhaps the remainder of the regulating should be left to those acts and regulations which generally provide for production of livestock and marketing of the products.

If that were to be done, and I'm not suggesting it would be a simple task, the Fish and Wildlife Division would then be left with the responsibility of developing legislation which would provide for conditions of captivity that would protect the wild resource, and provide for the sale of the wildlife produced in a manner that would assure that the wild resource would not be jeopardized by that activity.

That will be the most difficult task of all.

ENFORCEMENT CONCERNS

Current trends would indicate a lucrative market exists for utilization of big game species in a broader sense than is normally recognized by most Albertans. Because of our relatively short history in game management, the opinion is that wildlife's primary value is in its red meat. This, in fact, is not necessarily the case.

Recent experience in understanding and combating the illegal trade in animal parts for food, trophies and medicinal purposes has shed light on a growing demand here, as well as Europe and Asia. These demands far exceed supplies which can be provided through game farms, as they are beginning to adversely impact the far greater wild supply. The avenues to disperse the illegal trade are presently restricted. It may well be that by providing a legal avenue through which wildlife can pass, the flow from the wild populations will occur unhindered. It is not the concern of how domestically raised stock is dispersed but rather, the injection of those animals belonging to the Crown, that is repeatedly raised. It is impossible to differentiate meat or antlers raised on a farm from that taken legally or illegally from the wild. In an effort to adequately discourage elements from the wild population entering into the stream from producer to consumer, extensive and strict regulations would be required at a time when deregulation is being attempted.

Areas of trade that would be established, and regulations which would be required to adequately govern legalized trafficking, are as follows:

1) Traffic in meat

Because game farms are for profit and not wildlife enhancement, the producer obviously will be offered a wide variety of potential markets. This would include over-the-counter sales, sales to retail food outlets and to restaurants or other service outlets. It would
be necessary to trace the origin of the meat back from the final consumer to the producer no matter how many hands it passed through. Acceptable documentation would be required at each level to account for each animal slaughtered pound by pound. Any weakness in this chain of accountability could and would be utilized by unscrupulous persons to inject undetectable volumes of illegal meat onto the market. Meat produced on a game farm, once it has been reduced to steaks and roasts, will be impossible to separate from wild meat.

2) Traffic in Animal Parts for Medicinal Purposes and Aphrodisiacs

Covert investigations in this country and the U.S. have proven time and again that an extremely lucrative market exists for these items, especially in Asia. So much so that persons buying these items have indicated they quite literally ask their own price and have no fear that demand will decrease or that competition will affect business. At this time, in Alberta, antlers in velvet are being sold for $80 an ounce and a wide variety of items from hooves to penis bones fetch a variety of prices, though rarely under $20. These were observed in stores, presently in business, openly being offered to mainly Asian clientele. To regulate the flow of these items, ranchers would be required to keep accurate records of age and sex of animals. Cropping antlers in velvet would require confirmation of poundage cropped and a proper trail to the consumer would be required to balance pounds legally produced and pounds resold. The same avenue for abuse as outlined in the meat section applies here.

3) Access to land for the purpose of hunting

This could be a natural outgrowth of game ranching. Whether or not this is an acceptable practice to the majority of Albertans, may be an issue here.

4) Growing of Trophies for Sale

At first examination, game ranchers may be in a position to provide large heads for mounting. The sale of mounted heads, though not expressly permitted by the Wildlife Act or Regulations, has been allowed to grow during the past few years. Experience would indicate, though, that the difficulty in acquiring a large trophy mount has a definite influence on the value placed on it. This being the case, a large trophy taken under adverse conditions from the wild would be more valuable than that domestically raised. A trophy purchased from a farm, however, could be utilized to cover up the sale of a more valuable item with little difficulty.

These examples are only a few and represent only the most basic way in which a system set up to facilitate legal traffic could be used to expedite the movement of illegal wildlife, not only Alberta's, but endangered species from other jurisdictions where more stringent protective legislation has interrupted its movement there as well.

The final point of concern is that of attempting to deal with those persons who operate in a manner outside the original purpose of game
ranching, that is to say, those who are in fact profiting from illegal trade. Fines would have to be sufficient to take the profit out of those ventures for however long the practice was taking place. Cancellation of the licence to operate a game farm, and avenues to preclude those persons from operating through someone else, would have to be implemented to be an effective deterrent.

In closing, I would like to suggest that we are not convinced that this enterprise represents a significant long term commercial opportunity. It might be advisable to have the economics examined before we rush in. I have heard the suggestion that the only money to be made in game ranching is on the ground floor supplying breeding stock. Once sufficient breeding stock is available, apparently markets dry up.

I think it is important to suggest that, if we are going into this, we should go into it carefully and slowly. Maybe only two or three species should be provided for in the initial regulations, perhaps elk, white-tailed and mule deer.