

# What We Heard Report

A conservation breeding strategy to rebuild small caribou populations in Jasper National Park

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Indigenous, Stakeholder, and Public Consultations 2022



## Caribou populations in Jasper National Park are at imminent risk

Caribou populations in Jasper National Park have significantly declined to very small numbers over the last half-century. Evidence shows that if Parks Canada does nothing to intervene, the Tonquin and Brazeau populations in the park will be extirpated (become locally extinct). The Maligne population is already considered extirpated as there has been no sign of the remaining animals since 2018.

Southern mountain caribou is one of six species identified by the Government of Canada as a priority for conservation action. This priority status is based on their ecological, social and cultural values to Canadians, and because their recovery can significantly support other species at risk and overall biodiversity within the ecosystems they inhabit.

Parks Canada has developed a proposal to prevent the extirpation of southern mountain caribou in the Jasper National Park Local Population Unit and rebuild populations that can persist on their own. It is the product of years of information gathering, observation and scientific research. Currently, many of the threats to caribou in Jasper are mitigated and conditions are favourable to support larger caribou populations. Rebuilding the dwindling populations of caribou in the Jasper National Park Local Population Unit will help to ensure the continued existence of some of the world's southernmost caribou.

Parks Canada has explored in detail several options to support caribou recovery. Based on research and an external scientific review of the evidence for using conservation breeding, Parks Canada is confident that a conservation breeding and augmentation program is feasible and is the option with the highest likelihood of success.

### **A conservation breeding program is the best option to rebuild populations in the Jasper-Banff Local Population Unit**

Caribou conservation is a high-profile issue across Canada, involving many jurisdictions and significant public attention. Conservation breeding of caribou at the scale proposed by Parks Canada is also a novel approach in North America. For these reasons, Parks Canada committed to providing multiple opportunities for participation and conversation about the proposed

conservation breeding program to ensure that both the proposal and the Detailed Impact Assessment are based on the best available knowledge and information. Consultation is critical to understanding more fully the potential adverse impacts of this program and eliminating or mitigating adverse impacts to the extent possible.

This document presents the feedback Parks Canada received during formal consultations and summarizes how the feedback was used to refine the proposal and Detailed Impact Assessment. It is intended to be a summary of the ideas and comments received during consultation. Detailed comments are not shared in this report; however, all feedback was recorded and considered by Parks Canada when revising the proposal and Detailed Impact Assessment.

## Consultation has now concluded and the Detailed Impact Assessment has been completed

The questions, concerns and recommendations received during consultations were carefully summarized, analyzed and used to revise the conservation breeding program proposal and draft Detailed

Impact Assessment. Combined with previous research and analysis, the revised proposal and Detailed Impact Assessment will be used as the basis for Parks Canada's decision on proceeding with the proposed conservation breeding program to rebuild caribou populations in Jasper National Park.

Parks Canada sincerely thanks all those who shared their comments on the proposed conservation breeding program and draft Detailed Impact

Assessment. Your input helped refine and strengthen the proposal and Detailed Impact Assessment.

Although formal consultations on the proposed conservation breeding program and Detailed Impact Assessment have ended, Parks Canada will continue to engage and work together with Indigenous partners, government partners, stakeholders and the public on caribou recovery in Jasper National Park.



Photo by Layla Neufeld.

## Consultation Overview

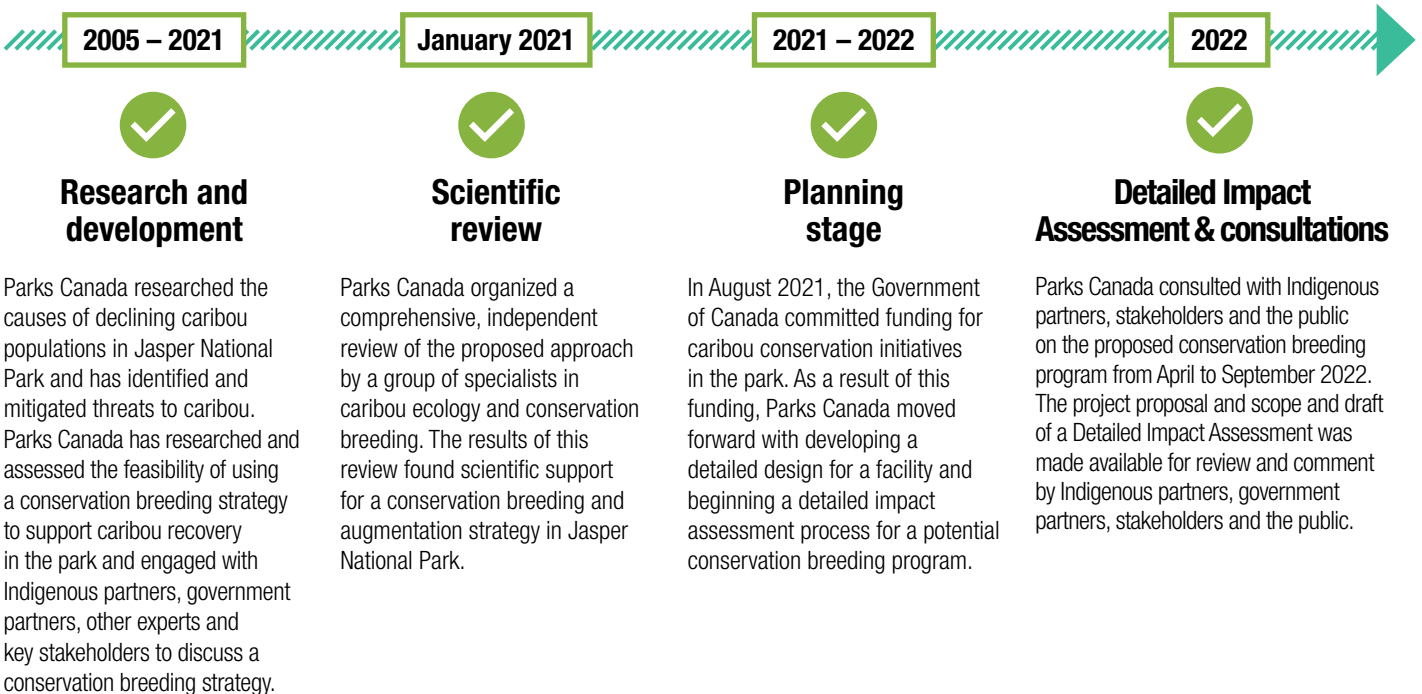
Before the launch of formal consultations in 2022, Parks Canada engaged with Indigenous partners, stakeholders and the public on various aspects of caribou conservation and recovery. **Early engagement activities that contributed to the initial development of the conservation breeding program proposal included:**

- Indigenous, stakeholder, and public engagement on the *Recovery Strategy for Woodland Caribou* (2014) led by Environment Canada between 2011 and 2014
- Indigenous, stakeholder, and public engagement on the *Multi-Species Action Plan for Jasper National Park* (2017) in 2017
- engagement activities with Indigenous partners on the proposed conservation breeding program in 2019, including written information, a site visit, and participation in the archaeological impact assessment of the proposed facility site
- an independent review of the proposed conservation breeding program by a group of international experts, the governments of Alberta and British Columbia, an Indigenous partner, and Parks Canada staff, facilitated by Foundations of Success in January 2021
- Indigenous, stakeholder, and public consultation on the Draft Management Plan for Jasper National Park in the spring and

summer of 2021, which included strategic direction and objectives for caribou recovery in the park

Parks Canada has also been working closely with partners in Environment and Climate Change Canada (ECCC), the Government of Alberta (Alberta), and the Government of British Columbia (British Columbia) for a number of years as the possibility of caribou conservation breeding as a recovery strategy for the Jasper/Banff Local Population Unit was explored. These government partners provided valuable information and insights that influenced the early development of the project proposal.

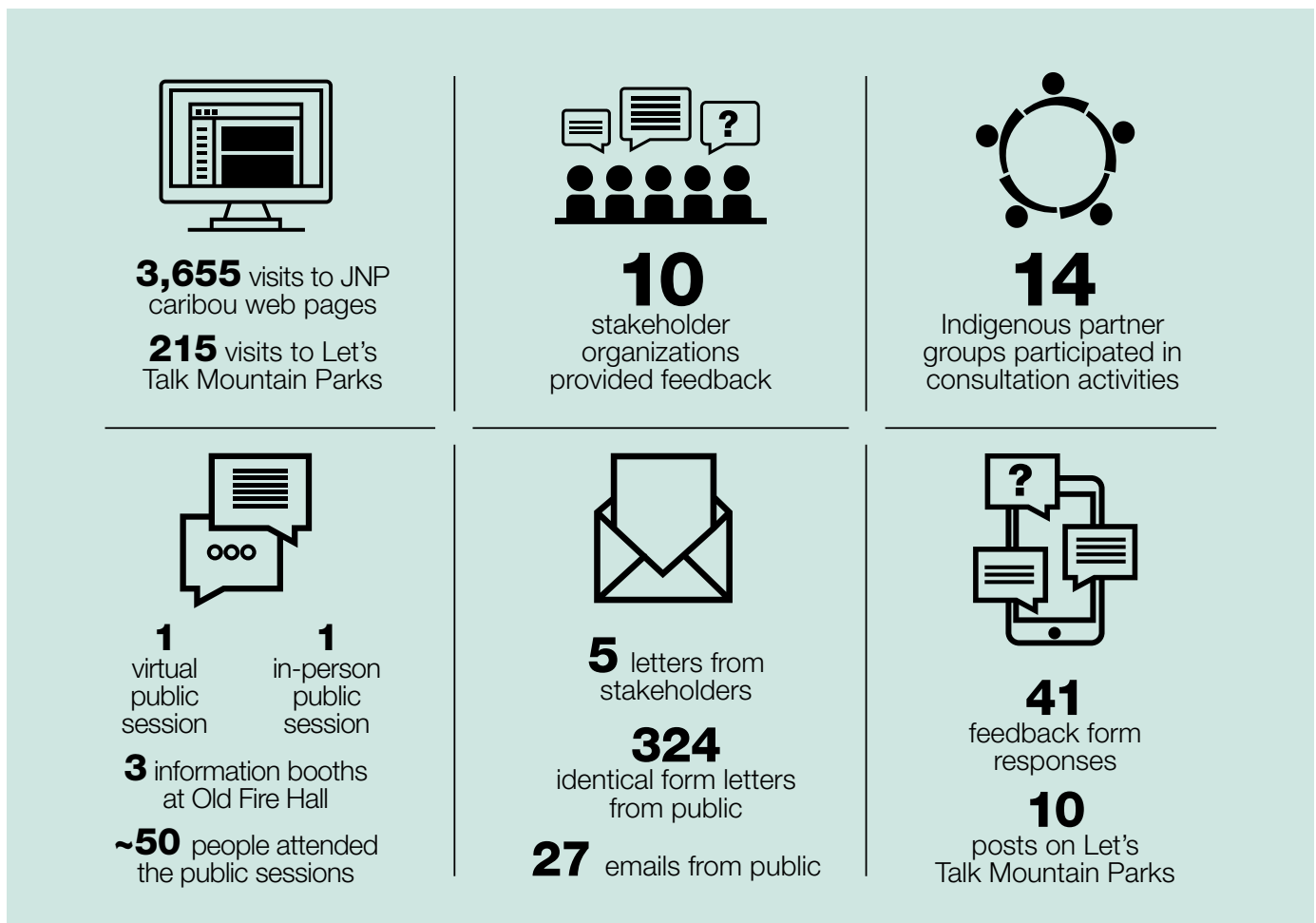
## What we have done



In the spring and summer of 2022, Parks Canada formally consulted on the conservation breeding proposal, the scope of the Detailed Impact Assessment and the draft Detailed Impact Assessment. Indigenous partners, stakeholders and the public were invited to learn about the proposed program and to share their feedback through meetings (both virtual and in-person), in writing, online and through the Canadian Impact Assessment Registry.

As shown in Figure 1, Parks Canada hosted several different consultation activities and received a significant amount of feedback on the proposal and draft Detailed Impact Assessment. Parks Canada analyzed all of the comments received and used them to refine and strengthen the proposal and Detailed Impact Assessment. Whether an idea was expressed once or multiple times, Parks Canada considered each piece of feedback on an individual basis.

Figure 1: Consultation activities and feedback



The vast majority of Indigenous partners, stakeholders and members of the public who provided feedback on the caribou conservation breeding proposal were supportive. Of the nearly 65 individuals and organizations who expressed an explicit opinion about the proposal, roughly 90 percent indicated support. If the 324 individuals who sent identical campaign letters indicating cautious support of the proposal are included, then those who have indicated some level of support for the program is roughly 98 percent. Only six members of the public explicitly expressed their opposition to the proposal, stating that the project was not a good use of funds, that caribou should follow their natural

*More than 95% of those who expressed an opinion strongly or conditionally supported the proposal*

course without intervention and that funding should be directed to park assets instead. Many respondents did not explicitly express their support or opposition to the proposal. Instead, they identified questions or concerns and in some cases offered recommendations to address their concerns.

Although Indigenous partners, government partners, stakeholders and the public shared different perspectives and concerns about the proposal, there were several commonly shared concerns (Figure 2). Parks Canada shares many of the concerns raised. These concerns helped to shape program design, and have led to adjustments to the Detailed Impact Assessment to reflect the feedback.

Continued collaboration and engagement are essential to the success of caribou recovery in Jasper National Park and to the program if it proceeds.

Figure 2: Most common concerns raised

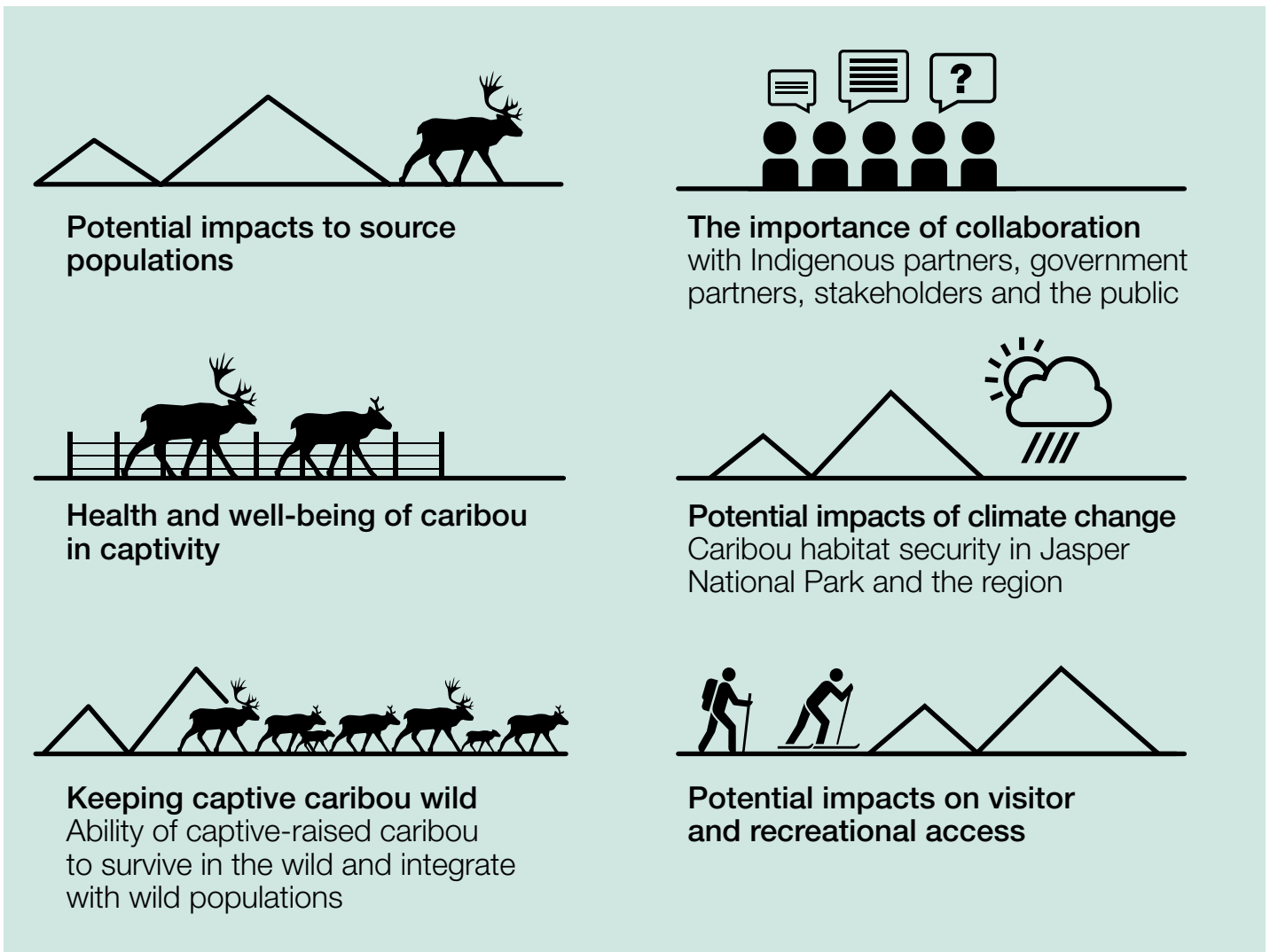




Photo by Mark Bradley.

## Graphic recording of Indigenous consultation session on the proposed caribou conservation breeding strategy, May 2022 — created by Aaron Russell, Conference Doodles



### Consultation with Indigenous partners

Parks Canada has specific obligations to conduct meaningful consultation with Indigenous partners on any project that may have an adverse impact to Indigenous interests and rights. Moreover, Indigenous consultation demonstrates Parks Canada’s respect for Indigenous peoples and reflects the Government of Canada’s commitment to a renewed relationship with Indigenous peoples rooted in the principles of the United Nations Declaration on the Rights of Indigenous Peoples and now enshrined in the *United Nations Declaration on the Rights of Indigenous Peoples Act*.

In recognition of the critical role that Indigenous peoples play in the

protection of natural and cultural resources, all Detailed Impact Assessments involve Indigenous consultation and engagement. This is necessary to facilitate the assessment of the proposed program on Indigenous rights and values in a manner that fosters reconciliation and strengthens understanding of all environmental elements and values of concern.

Parks Canada works with over 25 First Nation and Métis partner communities with historical connections to the lands that now make up Jasper National Park. A variety of methods were used to consult with Indigenous partners in the spring and summer of 2022, including sharing written information

and hosting a series of virtual and in-person meetings. Fourteen Indigenous partner groups participated in various consultation activities and provided thoughtful feedback on the proposal and draft Detailed Impact Assessment.

Throughout consultations in 2022, Indigenous partners expressed support for the proposed conservation breeding program. While supportive, Indigenous partners also expressed some concerns and offered some detailed feedback to strengthen the proposal and Detailed Impact Assessment. These comments and Parks Canada’s response to them are summarized in Table 1.





*Caribou, like the bison, are blessings. We want to see caribou come back to the landscape.*

*Things need to move faster in Jasper National Park. With climate change, things are moving rapidly. We want to see caribou in Jasper National Park... We want to be a part of the recovery.*

*We talk about economic reconciliation, but it takes a project like this one to put it into action.*

**Table 1: Summary of feedback provided by Indigenous partners during consultations in 2022**

<b>Potential impacts to source populations</b>	Indigenous partners are concerned about potential impacts to source populations. Indigenous partners are supportive of the proposal, as long as any populations outside Jasper National Park are not put at risk by moving wild caribou to the breeding centre.
<b>Parks Canada's considerations</b>	Parks Canada shares this concern and will work closely with Indigenous partners, government partners, and other experts to ensure that removing caribou does not impact the long-term viability of the source population.
<b>Potential impacts to caribou during capture</b>	Indigenous partners are concerned about the potential effects of capture on caribou, including capture myopathy, injury, or death.
<b>Parks Canada's considerations</b>	Capture myopathy or mortality related to capture and transport are always a risk. Knowledge gained over the past decades of caribou collaring for monitoring purposes and for translocation and maternity pens has shown that the mortality rate is very low and less than 1%. Parks Canada is confident that this low level of risk can be mitigated by following strict capture and using experienced personnel.
<b>Keeping captive caribou wild</b>	Indigenous partners are concerned about keeping caribou in the breeding centre wild so that they will be able to survive and integrate with wild populations when they are released.
<b>Parks Canada's considerations</b>	Parks Canada intends to keep the yearling pens as "hands-off" as possible to try to ensure that the caribou who are to be released can reintegrate into the wild successfully. Parks Canada will monitor released caribou and can adapt protocols within the facility as needed. Parks Canada has learned and will continue to learn from other caribou projects as well.

*We want young people in our community to see caribou in the future.*

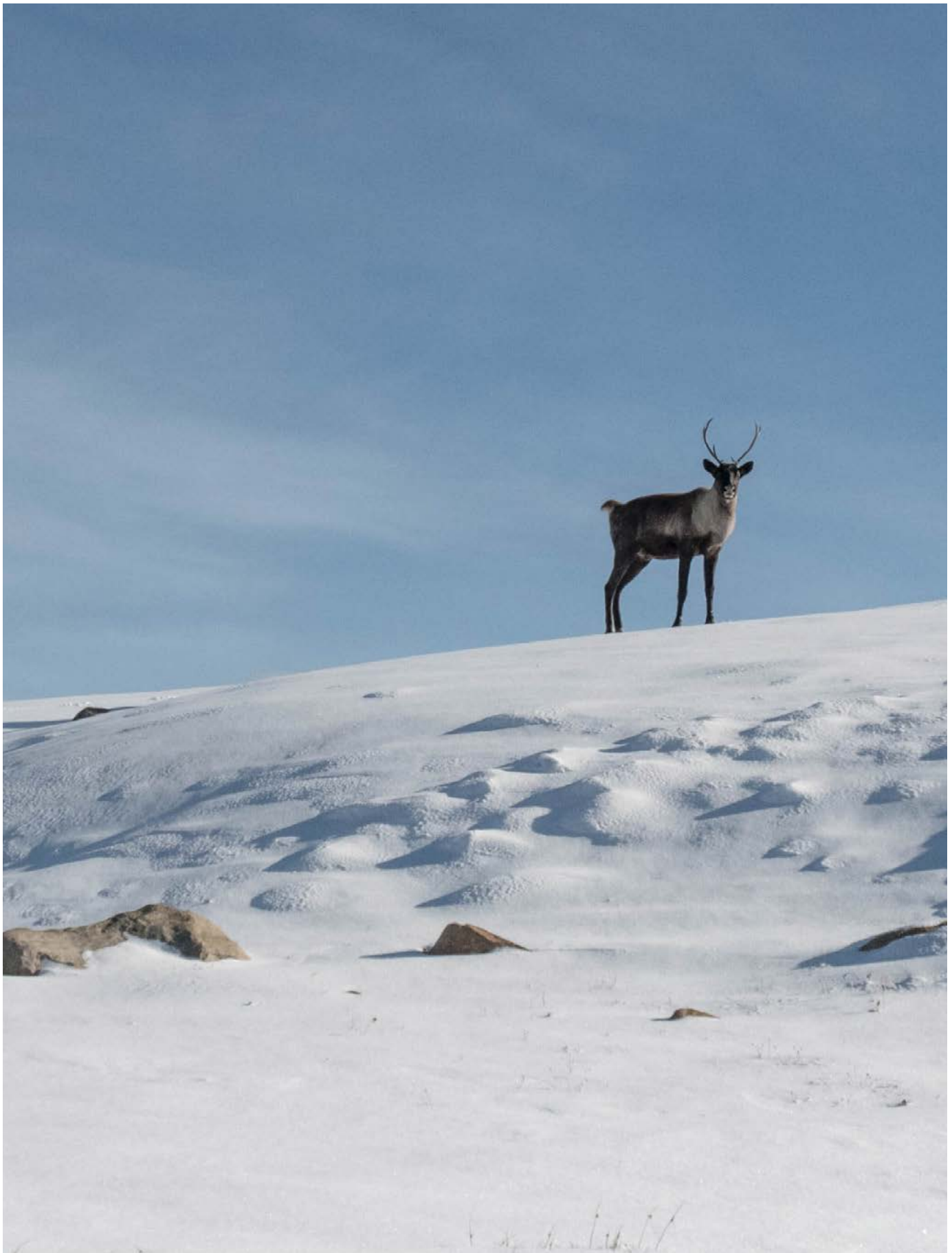
*We are very concerned about the Brazeau population, but if rescuing that population is the only way to save them, then we are okay with capturing the population.*

*Parks Canada needs to find a balance in the competing interests of sustainable caribou populations and park visitation. These aims aren't mutually exclusive. People want to see animals. However, Parks Canada can evolve the experience to be more than seeing. People should understand why some areas are off-limits to visitors and understand Indigenous connections to caribou. This is something that Indigenous partners can be involved in.*

**Table 1: Summary of feedback provided by Indigenous partners ...continued**

<p><b>Health and well-being of caribou in the breeding centre</b></p>	<p>Indigenous partners are concerned about the health and well-being of caribou in the breeding centre, including the density of animals and what they will eat in the breeding centre. They noted that caribou will have to be taken from other populations to form the breeding population and Parks Canada has an obligation to be careful with these animals.</p> <p>A partner recommended that Parks Canada consider a lichen collection program for Indigenous partners, similar to the one run by the Calgary Zoo in which they participate.</p>
<p><b>Parks Canada's considerations</b></p>	<p>Parks Canada agrees that there is an important responsibility to care for the caribou in the breeding centre. The health and well-being of the caribou is a main priority for the project.</p> <p>Parks Canada has discussed protocols for the breeding centre, including animal density, facility design, and animal diet and care, with experts in the field. Facility design and specific protocols for the breeding centre in Jasper are still being developed and will be adapted as needed based on research and monitoring.</p> <p>Parks Canada will continue to engage Indigenous partners on different partnering opportunities, such as a lichen collection program.</p>
<p><b>Captive-raised caribou adjusting to the wild</b></p> <p><b>Parks Canada's considerations</b></p>	<p>Indigenous partners are concerned about the ability of captive-raised caribou to survive in the wild and be accepted into wild populations, especially if the caribou are released without their mothers.</p> <p>There is evidence from other translocation projects that new animals are accepted into existing populations quickly. Parks Canada will monitor released caribou and adapt processes if necessary.</p> <p>Parks Canada will want to retain females for breeding at the centre, so the mothers will not be released with the calves. Not all caribou will do well in captivity, so in some cases, adult caribou may be released with the calves and can serve as "aunties" to the yearlings. Released caribou will be monitored and protocols and procedures can be adapted as needed.</p>

<b>Potential impacts of humans on newly-released caribou</b>	Indigenous partners are concerned about the potential impacts of humans on newly released caribou. They noted that Parks Canada needs to find a balance between the competing interests of sustainable caribou populations and park visitation. Indigenous partners are interested in being involved in education and outreach to help visitors understand Indigenous connections to caribou and why visitation is not appropriate in certain areas of the park.
<b>Parks Canada's considerations</b>	Parks Canada will monitor released caribou and can adapt protocols as needed to limit human impacts on newly released caribou.  Parks Canada will continue to work with Indigenous partners to develop partnering opportunities, including education and outreach.
<b>Predator control</b>	Indigenous partners are concerned about whether there will be a need for predator control in the future. They recognize the devastating impact that predators can have on small caribou populations.
<b>Parks Canada's considerations</b>	Currently, the wolf density in Jasper National Park is low and at a level that supports caribou recovery. Parks Canada will continue to monitor wolf populations in the park. If wolf populations rise, Parks Canada will analyze options to ensure caribou recovery is not jeopardized. We will use targeted and specific predator control if necessary (relocation or removal of specific predators).
<b>Program timing</b>	Indigenous partners are concerned that the proposed conservation breeding program is not moving fast enough. If we wait too long, the caribou will be gone before we can start.
<b>Parks Canada's considerations</b>	Parks Canada agrees that time is of the essence, but must also balance moving quickly with making sure the project is done well and doesn't put caribou at risk.
<b>Indigenous collaboration</b>	Indigenous partners stated strongly that they need to be partners with Parks Canada in caribou recovery. They would like to benefit from contracting opportunities during the construction of the breeding centre and employment and partnering opportunities during its operation. Specific opportunities that they suggested included lichen gathering, education and outreach programming, and Indigenous monitoring or guardians to protect caribou when they are released. They also requested to be part of an advisory or steering committee to oversee the implementation and operations of the program.
<b>Parks Canada's considerations</b>	Parks Canada has incorporated feedback from Indigenous partners into an Indigenous Benefits Package as part of the contracting process to build the breeding facility if the project is approved.  Parks Canada will continue to engage Indigenous partners on potential employment and partnering opportunities during operations if a decision is reached to proceed with the project. Parks Canada plans to invite Indigenous partner representatives to sit on an advisory committee.
<b>Indigenous knowledge, ceremony, and culture</b>	Indigenous partners expressed the importance of traditional knowledge, ceremony and culture informing the program and caribou recovery. They requested ceremonies at key milestones and events and suggested opportunities for knowledge sharing between Indigenous partner communities, Indigenous youth and Parks Canada staff.
<b>Parks Canada's considerations</b>	Parks Canada is committed to braiding Indigenous knowledge with western science to inform this program if it proceeds. We will continue to work with Indigenous partners to support and facilitate ceremonies and knowledge sharing.
<b>Potential impact of climate change</b>	Indigenous partners are concerned about the potential impact of climate change on caribou and caribou habitat, such as potential changes to lichen abundance and distribution.
<b>Parks Canada's considerations</b>	The effects of climate change are high on the list of threats for many of the species at risk in Jasper National Park. While scientists are trying to predict the effects of climate change, we can't anticipate every detail of how species will adapt to these changes, nor how those changes will ripple throughout ecosystems. In collaboration with Indigenous peoples and academics, Parks Canada is conducting important research within protected areas that will contribute to our understanding of current and future climate change impacts.



## Consultation with stakeholders

It is critical to understand potential adverse impacts to stakeholder interests related to the proposed project through meaningful consultation. The perspectives offered by stakeholders during consultation can lead to a more effective assessment process, and can help inform the proposed project by adding important insights and values.

A variety of methods were used to consult stakeholders in the spring and summer of 2022, including sharing written information and hosting a series of virtual meetings. Ten stakeholder organizations provided detailed feedback on the proposal and draft Detailed Impact Assessment.

*Many stakeholders recognize that an intensive approach is the last best chance for caribou recovery in the Jasper/Banff Local Population Unit.*

Stakeholders have expressed some concerns and offered detailed feedback to strengthen the proposal and draft Detailed Impact Assessment. These comments and Parks Canada's response are summarized in Table 2.

*This project is uniquely positioned to demonstrate how Indigenous Knowledge can be woven with western science to create a holistic program that addresses multiple landscape and species attributes.*

– Alberta Chapter of the Wildlife Society

*A successful program will ensure that caribou re-occupy ranges that they don't occupy anymore, especially the Maligne. This requires keeping caribou habitat in unoccupied ranges in a good quality state.*

– CPAWS

*We support the breeding program ... However, survival depends on much more than the breeding facility alone, which is essentially a short-term, emergency response to save an endangered species. Caribou need secure, intact habitat, and such a breeding program to support the long-term viability of the species must be supported by prioritizing habitat protection.*

– Y2Y



**Table 2: Summary of feedback provided by stakeholders during consultations in 2022**

<p><b>Potential impacts to source populations</b></p>	<p>Stakeholders are concerned about potential impacts to source populations, especially as many potential source populations also have low populations and are facing pressures from habitat destruction.</p> <p>Stakeholders also expressed concerns about translocating the entire Brazeau population to the breeding centre, as this population will then lose knowledge of the Brazeau landscape. They recommended that animals taken from the Brazeau be tracked in the breeding centre and become part of the translocated populations when animals are returned to the Brazeau range. Stakeholders recommended Parks Canada use consistent messaging about re-occupation plans and the need to protect habitat for caribou to re-occupy the Brazeau.</p> <p>Stakeholders expressed concerns about translocating members of the Tonquin population to the breeding centre. They recommended that as many remaining Tonquin wild caribou as possible continue to occupy their range to increase the likelihood of the captive-raised yearlings' survival when released into that range.</p>
<p><b>Parks Canada's considerations</b></p>	<p>Parks Canada's priority is to ensure that the long-term viability of any potential source population is not negatively impacted. We continue to work with provincial and federal partners, as well as other experts, to determine these source populations.</p> <p>Parks Canada intends to move the entire remaining Brazeau population into the breeding facility in order to preserve the genetics and behaviour of this population given its precarious survival over the long-term. Parks Canada will track the Brazeau animals and will strongly consider the possibility of reintroducing them to the Brazeau range to re-establish the Brazeau population.</p> <p>Currently, Parks Canada is considering capturing and translocating a few animals from the Tonquin population to preserve local genetics. Any animals removed from the Tonquin should not imperil that population as augmentation will likely be more successful if captive-raised animals are released into an extant population.</p>
<p><b>Keeping captive caribou wild</b></p>	<p>Stakeholders are concerned about keeping caribou wild in the breeding centre to improve their chances of successfully reintegrating into the wild when released. They recommended keeping captive animals primarily in outdoor pens that mimic the wild as much as possible, at a relatively low density, and keeping human contact to a minimum. CPAWS also recommended that caribou within the breeding centre should be fed locally harvested food when available.</p>
<p><b>Parks Canada's considerations</b></p>	<p>Parks Canada shares this concern. Handling protocols and site design are being developed with experts to try to limit human contact with caribou.</p>
<p><b>Health and well-being of caribou in the breeding centre</b></p>	<p>Stakeholders are concerned about the health and well-being of captive caribou. Concerns included breeding centre density, how caribou will adjust to life in captivity, keeping caribou as repetitive breeders, and the potential for disease transmission.</p> <p>Stakeholders recommended collaborating with Indigenous partners and behavioural ecologists, re-releasing caribou who do not adjust to captivity to their wild population, and establishing a maximum yearly limit of how long females stay in the breeding centre.</p>
<p><b>Parks Canada's considerations</b></p>	<p>Parks Canada will continue to consult with experts to develop appropriate animal handling and density protocols. Parks Canada has also worked with and learned from other similar projects, such as maternity penning projects (e.g. Nakusp, Mount Revelstoke, Klinse-za) to learn from their experiences. The health and well-being of the breeding population and captive-raised caribou released into the wild is of utmost importance to Parks Canada.</p> <p>Parks Canada plans to re-release caribou that don't adapt to captivity and will also consider returning animals back to the wild after a period of time at the breeding centre.</p> <p>Parks Canada will monitor the health of caribou in the facility and is drafting protocols to prevent and mitigate disease transmission.</p> <p>Parks Canada will collaborate with Indigenous partners on the implementation of this program if it proceeds. Behavioural ecology will be considered as part of the Science and Monitoring Plan.</p>
<p><b>Program end</b></p>	<p>Some stakeholders strongly believe that the conservation breeding program must have an end date and an exit strategy.</p>
<p><b>Parks Canada's considerations</b></p>	<p>The program is intended to be long-term but not permanent. The breeding centre would be built with a plan for eventually decommissioning and restoring the site to its natural state.</p> <p>The program will be assessed periodically against key milestones. For example, after the first few releases of caribou into the wild population, once the Tonquin reaches 200 caribou, or the Brazeau or Maligne reaches a sustainable population.</p>

<b>Potential impacts to caribou and caribou habitat from visitor use</b>	Some stakeholders are concerned about visitor use impacts on caribou and caribou habitat in Jasper National Park. Their recommendations included: monitoring human use in caribou ranges, especially as the populations grow; considering permanent limits to human activity within caribou ranges; integrating caribou habitat use patterns with visitor use to define an evidence-based threshold of visitation beyond which caribou are adversely affected.
<b>Parks Canada's considerations</b>	Parks Canada has worked to protect caribou habitat and will continue to protect habitat as required under the <i>Canada National Parks Act</i> and the <i>Species at Risk Act</i> .  Parks Canada will also continue other caribou recovery actions to minimize human use impacts on caribou and caribou habitat, including closing occupied caribou ranges in the winter. We will use the best information available to inform caribou recovery actions and will partner with relevant research projects whenever possible.
<b>Protection of caribou habitat</b>	Some stakeholders are concerned about caribou habitat security in Jasper National Park. They noted that for the long-term survival of caribou in the park, caribou need secure, intact, high-quality habitat. They also noted that a successful program will ensure that caribou re-occupy ranges that they don't occupy anymore, which requires keeping caribou habitat in unoccupied ranges in a good quality state.
<b>Parks Canada's considerations</b>	Parks Canada recognizes that critical habitat protection in national parks is important and caribou, wild or reintroduced, cannot thrive without these protections in place. Parks Canada will continue to protect caribou habitat in occupied and unoccupied ranges as required under the <i>Species at Risk Act</i> , the <i>Canada National Parks Act</i> , and the 2022 <i>Jasper National Park Management Plan</i> .
<b>Communication approach</b>	Some stakeholders are concerned that Parks Canada is not communicating adequately about caribou recovery initiatives in Jasper National Park. They recommended that Parks Canada develop and deliver public education and engagement programming for park users to increase understanding and long-term support of the conservation breeding program.
<b>Parks Canada's considerations</b>	Parks Canada has an outreach and education program for caribou that includes interpretive programs, virtual school programs, and web and new media content. Parks Canada will continue to deliver and further develop outreach and education programs to explain the conservation breeding program and caribou recovery.

*Parks Canada must use the best available science and traditional knowledge to inform breeding, rearing, and release of caribou to optimize caribou welfare in captivity and survival rates in the wild.*

– CPAWS

**Stakeholders made several recommendations and requests to strengthen the proposal including:**

- develop a plan to take action if captive-raised calves start to habituate in the breeding centre
- integrate caribou habitat use patterns with visitor use data to define an evidence-based threshold of visitation beyond which caribou are adversely affected that can inform access management in caribou habitat
- take action to reduce recreation pressures on caribou and on critical caribou habitat by building awareness about human impacts on caribou and caribou habitat

- use consistent messaging about the intention to return caribou to unoccupied caribou ranges and the need to protect caribou habitat in these ranges
- keep communications open and engage with tourism and recreational groups as partners in caribou recovery

*Finding source caribou for the founding population in the breeding facility is a challenge in large part because of the similar status of caribou on surrounding provincial lands*

– Alberta Chapter of the Wildlife Society

Graphic recording of in-person public consultation session on the proposed caribou conservation breeding strategy, June 2022 — created by Erica Bota, ThinkLink Graphics



### Consultation with the public

Meaningful public consultation is integral to an effective, open and transparent assessment process. Public insight and values informed the proposal by providing a more complete perspective.

Parks Canada hosted a virtual and an in-person session to present detailed information about the proposed program and understand questions, concerns and recommended mitigations from the public. Approximately 50 people attended one of these two sessions. Also, on three different dates, information booths were set up at the Old Fire

Hall in Jasper. Members of the public who stopped at the booth were provided information about caribou and the proposed program and were invited to provide feedback on the proposal by email or through the website.

The Jasper National Park website provided detailed information about the history and current status of woodland caribou in the park, shared the full proposal, provided links to the draft Detailed Impact Assessment on the Canadian Impact Assessment Registry, and invited feedback through a feedback form, the Let’s Talk Mountain Parks website or by email. Overall, Parks

Canada received 41 form responses, 10 posts on the Let’s Talk Mountain Parks website, 324 identical campaign letters and 27 emails. A significant majority of the public expressed support for the proposed conservation breeding program. Comments received from the public and Parks Canada’s response to them are summarized in Table 3.

*A significant majority of the public expressed support for the proposed conservation breeding program*





*Just a waste of time, resources, and a whole lot of added stress to unfortunate animals who have had their numbers reduced to nothing and then the last surviving ones to be tormented all for nothing in the end.*

*I would love to see several resilient populations of caribou sustain themselves well into the future decades. I think we should do everything within our capabilities to make this a reality.*

*I don't think any Canadians want to see any more of our species go extinct. Caribou are a really significant one right across the country.*

*I think Parks Canada should leave the caribou alone as they are today and not conduct a conservation breeding program. It's unclear how climate change will affect caribou but it may well push them farther north, out of JNP and into areas with too much disturbance. I think there are too many unknowns about why caribou populations are declining across North America to support this project. If they die out in JNP, they die out.*

*We must act quickly to save this iconic species. Please make this plan a reality, before it's too late.*

Graphic recording of virtual public consultation session on the proposed caribou conservation breeding strategy, June 2022 — created by Erica Bota, ThinkLink Graphics



Table 3: Summary of feedback provided by the public during consultations in 2022

<p><b>Potential impacts to source populations</b></p>	<p>Concerned about potential impacts to source populations, including the long-term survival and potential social impacts to these populations. Specific concerns were expressed about the À la Pêche, Brazeau, and Tonquin populations being used as potential source populations.</p>
<p><b>Parks Canada's considerations</b></p>	<p>Parks Canada's priority is to ensure that the long-term viability of any potential source population is not negatively impacted. We continue to work with provincial and federal partners, as well as other experts, to determine these source populations.</p> <p>Parks Canada intends to move the entire remaining Brazeau population into the breeding centre to preserve the genetics and behaviour of this population given its precarious survival over the long term. This population is well below quasi-extinction levels and is facing imminent extirpation.</p> <p>Parks Canada is also considering capturing and translocating a few males and potentially a few females from the Tonquin population in order to preserve local genetics within the captive population that may otherwise disappear. However, we do not want to take all of the animals or threaten the stability of the population as there is a greater chance of success to augment an extant population rather than trying to reintroduce caribou into the Tonquin Valley later.</p> <p>Further analysis and collaboration with experts and partners will inform these decisions.</p>



*My only concern is that captive bred caribou may not have the fear of predators that a caribou in the wild would have. This may make them susceptible to being killed.*

*It is incorrect to say that we must let Mother Nature follow its course, even if this means looking at caribou extirpation. It is incorrect because humans have already disturbed Mother Nature even in Parks with roads, trails, ski facilities, and other disturbances. ... This is important that humans try to help caribou to recover in the habitat that humans disturbed.*

<p><b>Genetic diversity in the breeding population</b></p>	<p>Concerned that the breeding population in the proposed breeding centre must have genetic diversity for the long-term success of captive-bred caribou.</p>
<p><b>Parks Canada's considerations</b></p>	<p>Parks Canada intends to draw animals from source populations that are genetically and behaviourally suitable and only from populations that can sustain removals without affecting that population's long-term viability. We have completed several fine-scale genomic analyses on source populations to help inform these requirements. From this work, we have a good understanding of genetic diversity in caribou and would draw from several sources to maximize genetic diversity within the captive population. Genetic monitoring and matching in the captive population will be important as we strive to maintain and maximize genetic diversity. It will also be important to bring new bulls into the facility regularly to maintain genetic diversity.</p>
<p><b>Keeping captive caribou wild</b></p>	<p>Concerned that caribou in the breeding centre will become accustomed to humans and will not be able to survive in the wild upon release.</p>
<p><b>Parks Canada's considerations</b></p>	<p>Parks Canada agrees that animal handling in the facility will have to be carefully managed. The intention is to keep yearlings that are to be released in the pens furthest from the buildings and to have as little human contact with these animals as possible. The most intensive handling of animals will only be with the breeding females to ensure their health and well-being while at the centre.</p>

**Table 3: Summary of feedback provided by the public ...continued**

<b>Health and well-being of caribou in the breeding centre</b>	Concerned about the health and well-being of caribou in the breeding centre, particularly around potential disease transmission and population density in the breeding centre.
<b>Parks Canada's considerations</b>	The health and well-being of caribou in the breeding centre is of utmost importance to Parks Canada. Health screening on potential source populations is being done and we will take animals from chronic-wasting-disease-free areas. Animals will be tested when first brought into the facility for different diseases and placed in quarantine initially. Disease control protocols will be in place to prevent the spread of disease within the centre and to wild populations.
<b>Captive-raised caribou in the wild</b>	Concerned about the ability of captive-raised caribou to adapt to the wild. Specific concerns included: caribou raised in a forested area will not adapt to a more alpine environment when released; captive-raised caribou won't know how to survive in the wild, especially if released without their mothers; captive-raised caribou will not be accepted by wild populations.
<b>Parks Canada's considerations</b>	A number of measures will be used to try to increase the likelihood of captive-raised caribou surviving in the wild. When released, the captive-raised caribou will be placed into a soft release pen with wild Tonquin animals from whom they can learn. Females will be released just before the rut, so that they can integrate with the harems. There will also likely be snow on the ground at high elevation when females are released in September or October, which will help prevent predator access to the populations. Additionally, the winter seasonal closures in caribou habitat will remain in place, predator density is low in Jasper National Park, and caribou will be released within the core of their range, away from where most predators are located in the park. The caribou will be monitored after release, and additional measures can be taken to protect caribou as needed, including the targeted relocation or removal of individual predators.
<b>Predator control</b>	Concerned about the need for predator control in the future if an increase in the caribou population leads to an increase in the wolf population in the park. Some were supportive of predator control and others were opposed to any predator control.
<b>Parks Canada's considerations</b>	<p>Parks Canada does not anticipate that an increase in the caribou population will lead to a substantial increase in the wolf population in the park. In the past when Jasper National Park experienced a large increase in wolf populations, there were over a thousand elk helping to support that growth. Two hundred caribou will provide some food for wolves, but it is not a high enough density to actually increase wolf populations. If caribou populations are large enough, they can also sustain some level of predation.</p> <p>Parks Canada will continue to monitor predator and prey populations and will take actions as necessary if these populations start to become imbalanced. A predator management strategy will be developed, which will establish thresholds and conditions under which targeted and specific predator management actions (relocation or removal) will be used, if required, to support augmentation of caribou in the Tonquin caribou range.</p>
<b>Impacts to visitor access</b>	Concerned that the proposed location of the breeding centre may affect visitor access to the area. Other members of the public expressed concern about long-term changes to backcountry access in the winter and the summer in caribou ranges.
<b>Park Canada's considerations</b>	<p>Should this project proceed, there will be no significant or long-term closures to the Geraldine Fire Road; however, public access to the Geraldine Fire Road, Geraldine Lakes, and Fryatt Valley will be impacted at times, and with some changes to the current winter access offered.</p> <p>There also may be temporary closures at locations where young caribou are released if the program proceeds.</p> <p>If the recovery of the Tonquin population is successful and if caribou are re-introduced to unoccupied caribou ranges (e.g. Brazeau range and Maligne range), seasonal closures in winter caribou habitat may be re-instated in these ranges.</p>
<b>Program timelines</b>	Concerned that the program is not moving fast enough. Time is of the essence.
<b>Parks Canada's considerations</b>	Parks Canada agrees that time is of the essence, but must also balance moving quickly with making sure the project is done well and doesn't put caribou at risk.

<p><b>Unintended consequences of increasing caribou populations</b></p>	<p>Concerned that increasing the caribou population in the park will lead to unintended consequences, such as an increase in backcountry visitation to see caribou, which could negatively impact caribou; increased competition for a limited number of resources; and impacts to human recreation in the park.</p>
<p><b>Parks Canada's considerations</b></p>	<p>Parks Canada does not anticipate a significant increase in backcountry use if this program is implemented because of existing measures that regulate visitor use in the Tonquin Valley, such as the fixed availability of campsites and random camping permits, and regulations regarding horse and bike access.</p> <p>Parks Canada knows that in the past, the caribou populations in the park were much higher than current levels. Parks Canada anticipates that as populations increase, caribou will move into currently unoccupied caribou habitat. Caribou habitat quality remains high and protected, and Parks Canada believes that higher population levels can be supported. Caribou will be monitored and adaptations to the program will be made as needed.</p> <p>No new long-term closures related to this proposal are planned. There may be temporary, short-term closures, and seasonal closures may be re-instated in currently unoccupied caribou ranges if they are re-occupied.</p>
<p><b>Additional caribou recovery initiatives</b></p>	<p>Concerned that other caribou recovery measures need to be taken in addition to conservation breeding, including habitat protection and improvement, limiting development in caribou habitat, seasonal or permanent human access restrictions in caribou habitat, fixing the original causes of declining caribou populations in the park, and public education about caribou recovery actions.</p>
<p><b>Parks Canada's considerations</b></p>	<p>Parks Canada agrees that conservation breeding is only one tool for caribou recovery. Parks Canada will continue to implement the other caribou recovery strategies already in place and will consider implementing additional measures as may be required in the future. These actions include caribou habitat protection, seasonal access closures, outreach and education, and ecosystem and wildlife monitoring and management.</p>
<p><b>Human intervention in caribou recovery</b></p>	<p>Members of the public expressed both concern for and support for human intervention in managing caribou populations. Some are concerned that the proposed conservation breeding program is a significant intervention that will require the care and feeding of animals and questioned if other less intensive interventions could be used instead. Some felt that the future of caribou should be determined by natural factors. Others suggested that human intervention is critical.</p>
<p><b>Parks Canada's considerations</b></p>	<p>Parks Canada is responsible for protecting and restoring species at risk, including caribou. Parks Canada recognizes that the proposed conservation breeding project is an intensive wildlife management project. Considering that the cause of caribou decline in Jasper National Park is linked to past management actions, this may be an opportunity to correct mistakes with better information than was available in the past. We have considered and evaluated other possible strategies, but research shows these interventions are not likely to be successful in the Jasper context. The evidence also shows that if Parks Canada does nothing to intervene, the caribou populations will eventually become locally extinct.</p>
<p><b>Potential impacts of climate change</b></p>	<p>Members of the public are concerned about the potential impacts of climate change on caribou recovery.</p>
<p><b>Parks Canada's considerations</b></p>	<p>The effects of climate change are high on the list of threats for many of the species at risk in Jasper National Park. While scientists are trying to predict the effects of climate change, we can't anticipate every detail of how species will adapt to these changes, nor how those changes will ripple throughout ecosystems. In collaboration with Indigenous peoples and academics, Parks Canada is conducting important research within protected areas that will contribute to our understanding of current and future climate change impacts.</p>





Photo by Layla Neufeld

## Collaboration with government partners

ECCC, Alberta and British Columbia have provided valuable information and insights on caribou recovery over the last several years. These insights influenced the early development of the project proposal, and discussions with government partners about conservation breeding and caribou recovery in a regional context are ongoing. In July 2022, these government partners were provided the project proposal and draft Detailed Impact Assessment, and invited to provide feedback and identify any concerns they may have. All three government partners provided written comment.

### **Government partners identified a number of concerns, including:**

- the need for clear communication, collaboration and coordination between

jurisdictions, particularly concerning the potential translocation of caribou from populations on provincial lands to the proposed breeding centre in Jasper National Park

- potential impacts to source populations; specifically, government partners are concerned that the removal of caribou from populations provincially managed and those with shared jurisdictional management may limit the provinces' abilities to stabilize and recover these southern mountain caribou populations
- whether the current ecological conditions in Jasper National Park can support caribou recovery, including specific concerns around the perceived low survival rates of caribou in Jasper National Park, the use of the maximum

wolf density cited in the *Recovery Strategy for Woodland Caribou (2014)*, and Parks Canada's decision to not consider predator control as part of the recovery strategy in Jasper National Park

Government partners recommended the development of a specific agreement and the establishment of advisory and technical committees to guide ongoing work regarding the potential translocation of caribou from populations on provincial lands to the proposed breeding centre in Jasper National Park. They also recommended updated modeling work to identify the number of caribou and a timeline for removal of caribou from provincial populations such that the long-term viability of the source populations is not imperilled.

## Changes to the Proposal and Detailed Impact Assessment

Parks Canada shares many of the concerns expressed by Indigenous partners, stakeholders, the public and government partners. We carefully considered the feedback and specific recommendations made. Based on the feedback provided, Parks Canada made several adjustments to the project proposal and Detailed Impact Assessment, including:

- strengthening the narrative of Section 8.9 to reflect feedback received from Indigenous partners, including referencing the development of an Indigenous Inclusion Plan to ensure a suitable process is established for further collaboration with Indigenous partners
- including a commitment to continue collaborating and cooperating with government partners, including the development of appropriate formal agreements, consistent with the *Species at Risk Act*
- strengthening the wording in the Detailed Impact Assessment that Parks Canada will collaborate with an Indigenous working group who will provide advice and direction on the interpretation and weaving of Indigenous knowledge into the project
- strengthening the wording in the Detailed Impact Assessment to indicate that Parks Canada will work with provincial, federal and local Indigenous partners, as well as other experts in caribou conservation, to avoid imperiling the long-term

viability of source populations and to recognize that additional work is required in this regard

- including a commitment to only capture caribou on provincial lands or from a shared population (i.e. À la Pêche) under a Parks Canada-provincial agreement

*Parks Canada will continue to work with Indigenous partners, government partners, stakeholders and the public to collaborate on and implement the program if it proceeds.*

- identifying potential external advisory and technical committees that will be established to support the conservation breeding project in Jasper National Park on topics such as the identification of source populations and animal husbandry
- strengthening the wording in the Detailed Impact Assessment to indicate that Parks Canada will develop and implement rigorous health and husbandry protocols
- adding relevant details to Sections 3 and 8.9 to reflect the development of an Indigenous Benefits Package as part of the contracting opportunities for the project

- including a commitment to collaborate with Indigenous partners on outreach and education programming, knowledge sharing, plant harvest opportunities and antler collection and sharing in Section 8.9
- including a commitment to develop a predator management strategy that will establish thresholds and conditions for which targeted, localized predator management (e.g. relocation or removal) may be utilized
- adding relevant details about the Science and Monitoring Plan, and Indigenous working group and potential technical committees to address knowledge deficiencies to Sections 2.4, 8.7, and 11
- identifying climate change and human use impacts on caribou and caribou habitat as a knowledge gap that will be addressed through the Science and Monitoring Plan in Section 11
- referencing the Science and Monitoring Plan regarding the monitoring of predator and prey populations and clearly identifying that targeted and specific predator management actions (relocation or removal) will be implemented if necessary
- updating the maximum wolf density needed to support caribou recovery and associated references based upon the recommendations made

Parks Canada will continue to work with Indigenous partners, government partners, stakeholders and the public to collaborate on and implement the program if it proceeds.



## Comments outside the scope of the proposed program and Detailed Impact Assessment

Several concerns raised by Indigenous partners, stakeholders and the public were outside the scope of the conservation breeding program itself, although these concerns are connected to caribou recovery more broadly. For example, participants provided feedback and made recommendations on specific operational plans for conservation breeding. These operational details were not included in the proposal or the Detailed Impact Assessment as they will only be finalized if the program proceeds.

However, Parks Canada has recorded the feedback and recommendations, and will consider this input if and when the operational plans are finalized.

Other feedback included comments and recommendations related to visitor access management and seasonal closures, caribou habitat security regionally and funding for the proposed program. These comments and Parks Canada’s response to them are summarized in Table 4.

Although this feedback may not have resulted in changes to the Detailed Impact Assessment or influenced the continued development of the proposed program, Parks Canada will consider this feedback within the broader context of caribou recovery.

**Table 4: Consultation feedback that is outside the scope of the proposal and draft Detailed Impact Assessment**

<p><b>Visitor access management / seasonal closures</b></p>	<p>There was both support for and opposition to seasonal closures in occupied caribou habitat from members of the public.</p> <p>Some stakeholders recommended that Parks Canada monitor human use in caribou habitat and integrate caribou habitat use patterns with visitor use data to define an evidence-based threshold of visitation beyond which caribou are adversely affected. Some also recommended that Parks Canada inform the public about the reasons for the seasonal closures, the conservation breeding program, and the overall strategy to recover the Jasper/Banff Local Population Unit, and not just the Tonquin population.</p>
<p><b>Parks Canada’s considerations</b></p>	<p>Seasonal closures in occupied winter caribou habitat support caribou recovery initiatives but are not directly tied to conservation breeding. These seasonal closures will remain in place whether or not the proposed conservation breeding program moves forward in order to support the recovery of the Jasper/Banff Local Population Unit. The purpose of closing occupied caribou habitat in winter is to reduce facilitated predator access to caribou.</p> <p>In Jasper National Park, caribou and their habitat are protected under the <i>Canada National Parks Act</i> and <i>Species at Risk Act</i>. While these acts do not prescribe specific management actions to take, they direct Parks Canada to protect and recover species at risk and their habitat, which includes reducing threats. <i>The Recovery Strategy for Woodland Caribou, Southern Mountain population, in Canada</i> identifies facilitated predator access into caribou habitat on packed trails created during winter recreational activities as a threat to the species. Seasonal winter closures are an effective measure to reduce this threat.</p> <p>In Jasper National Park, visitor experiences will be managed in a way that does not compromise caribou recovery. The priorities for park management are outlined in the 2022 Jasper National Park Management Plan. Park management and operations are also guided by the <i>Canada National Parks Act</i> and a suite of other acts, regulations and policies.</p> <p>Parks Canada will develop outreach and education programs to help connect the public to the project, including caribou recovery more broadly for the Jasper/Banff Local Population Unit (Banff, Brazeau, Maligne, Tonquin populations).</p>
<p><b>Regional caribou habitat security and landscape-level caribou recovery</b></p>	<p>Stakeholders and members of the public also expressed concern about caribou habitat security regionally (e.g. outside of Jasper National Park). Some stakeholders noted that connectivity between federal and provincial lands is important for caribou security and recovery.</p> <p>Participants recommended that Parks Canada work with the provinces of Alberta and British Columbia to improve landscape connectivity and habitat security on surrounding provincial lands. Some also recommended working with neighbouring jurisdictions and Indigenous partners on a landscape-level caribou restoration program.</p>
<p><b>Park Canada’s considerations</b></p>	<p>Parks Canada will continue to work with federal and provincial partners to support regional habitat security as outlined through the <i>Multispecies Action Plan</i> (2017) and the 2022 <i>Jasper National Park Management Plan</i>. We will participate in relevant research projects whenever possible. We will continue to comment on provincial caribou range planning in Alberta and caribou population planning in BC as invited.</p>





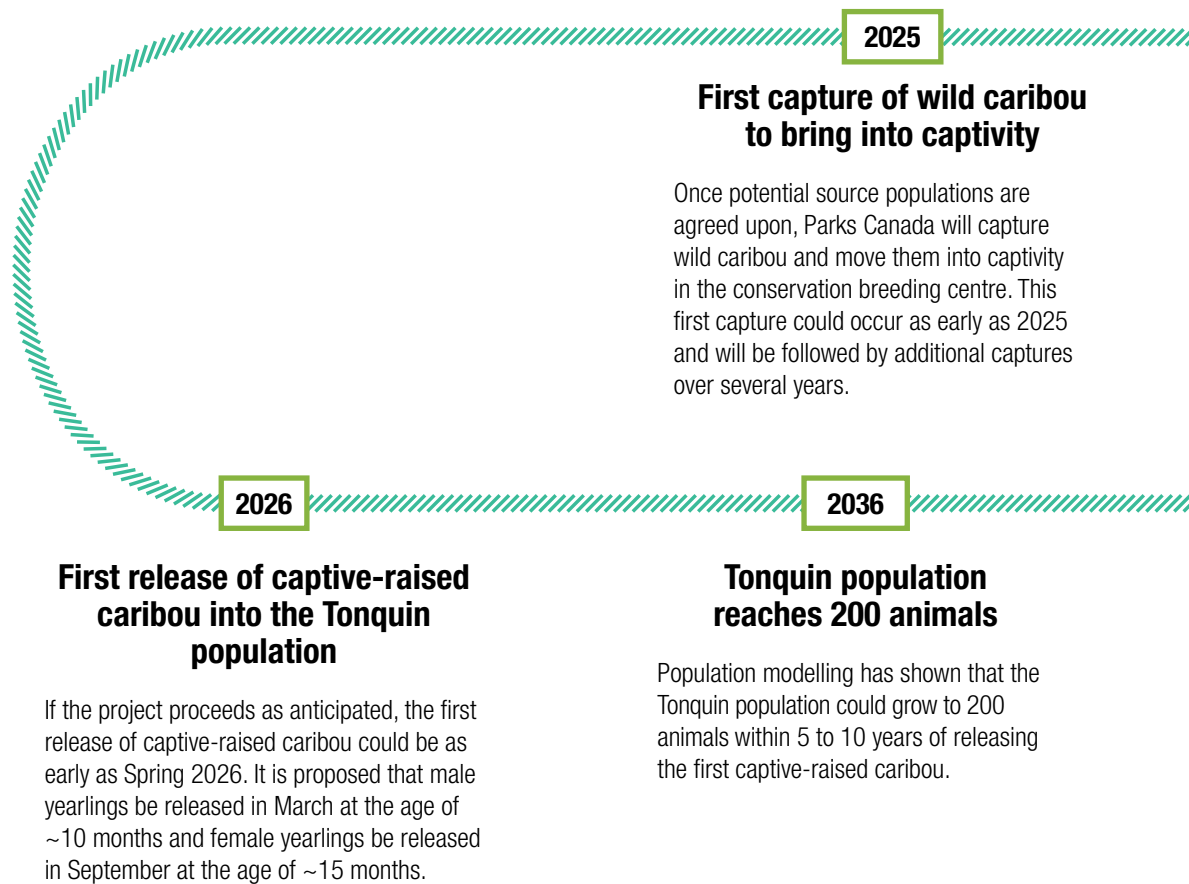
*The aspect and impact that I am very concerned about is the loss of ski culture/history, recreational ski/backcountry opportunities and the Tonquin Valley Outfitters which also should be relevant in a National Park. Mountain culture and particularly ski mountain culture are important.*

<p><b>Program funding</b></p>	<p>Several members of the public expressed concern about the funding of the proposed program. Some thought that the funding might be better spent elsewhere, such as asset maintenance or outreach and education. Some were worried that not enough funding would be allocated, that inflation would greatly increase project costs, or that a change in government would result in funding being cut.</p>
<p><b>Parks Canada's considerations</b></p>	<p>The Government of Canada is committed to recovering species at risk, and southern mountain caribou have been identified as one of six priority species for conservation. The health and well-being of caribou is a top priority for Parks Canada and funding will be allocated and maintained accordingly.</p> <p>Conservation breeding, because of associated infrastructure, is a costly approach; however, Parks Canada believes that it is the best option to recover caribou populations in Jasper. Other strategies have been explored but these alternatives are unlikely to increase caribou populations in Jasper. Parks Canada is aware of potential inflation and has contingency plans in place if the program proceeds. It is anticipated that current cost estimates for the program, especially for the construction of the breeding centre, will increase given the rapid increase in material costs, inflation, labour shortages and supply-chain challenges.</p> <p>Funding is allocated within Parks Canada for conservation priorities, such as caribou recovery. Funding for asset and infrastructure maintenance is allocated through a separate process. Parks Canada has invested significantly in assets in the last several years; investment in conservation and in assets are not mutually exclusive.</p>
<p><b>Long-term backcountry access restrictions</b></p>	<p>Some members of the public are concerned about long-term changes to backcountry access in the winter and summer in caribou ranges, and in some cases even expressed concern that the Tonquin Valley would be closed to public access entirely. They expressed doubt about Parks Canada's statement that no new long-term closures were planned given the recent extension of the winter closures in the Tonquin and Brazeau ranges and the closures of the Tonquin Valley outfitters.</p>
<p><b>Parks Canada's considerations</b></p>	<p>Parks Canada reiterates that no new long-term closures related to this proposed conservation breeding program are planned. There may be temporary, short-term closures. For example, there could be delays or temporary closures during construction of the breeding centre for safety reasons, or temporary closures at locations where young caribou are released. If the recovery of the Tonquin population is successful and if caribou are re-introduced to ranges that caribou are not inhabiting at the time (e.g. Brazeau range and Maligne range), seasonal closures in winter caribou habitat may be re-instated as they once were when caribou lived in these ranges.</p> <p>In October 2021, Parks Canada extended the length of the seasonal closures in occupied caribou habitat. Previously, seasonal closures were in place from November 1 to February 15. Starting in 2021, seasonal closures are in place from November 1 to May 15.</p> <p>The two licensed outfitters in the Tonquin Valley were impacted by this decision because the access restrictions reduced their operating season by ten weeks and eliminated their ability to use snowmobiles to resupply lodges. Recognizing this impact, Parks Canada entered into discussions with the outfitters in autumn 2021 to negotiate options to continue operating from May 16 to October 31 each year or to end their licenses of occupation with compensation. In 2022, Parks Canada reached an agreement with Tonquin Valley Adventures and Tonquin Valley Backcountry Lodge to end their licenses of occupation and to purchase all infrastructure and non-moveable assets.</p> <p>The Tonquin Valley is open to backcountry recreation between May 16 and October 31. Overnight accommodation can be reserved at one of Parks Canada's seven campgrounds in the Tonquin Valley and at Hostelling International's Edith Cavell Hostel and Alpine Club of Canada Wates-Gibson Hut in the summer season.</p>

## Timeline and next steps

If the program proceeds, construction of the breeding centre could begin as early as 2023 and would likely take two years to complete. While the breeding centre is being constructed, Parks Canada would work with government partners and experts to confirm suitable source populations and strategies to sourcing animals in a way that does not negatively affect source populations. We would also continue to work with experts on finalizing the operational and monitoring plans for the conservation breeding program.

Although formal consultations have ended, ongoing engagement with Indigenous partners, government partners, stakeholders and the public will be an important element of implementation if the program proceeds. Parks Canada will work closely with Indigenous partners to determine how they will partner and collaborate with us on the implementation of this important program. The concerns and recommendations made by stakeholders and the public will be considered as implementation and operational plans are developed. We will look for opportunities to continue to connect with stakeholders and the public about the program if it proceeds.





## What is next?

2022 – 2025

### Design and construction

Parks Canada has now completed work on the design of the breeding centre. A tender for construction of the centre has been issued. Construction could begin as early as 2023.

2022 – 2025

### Confirming suitable source populations

Discussions with federal and provincial government partners and Indigenous partners to identify and mitigate risks to source populations and to determine the best approach to sourcing animals from other populations is ongoing. Appropriate agreements and technical committees will be established.

2040+

### Brazeau and Maligne caribou populations reach 300 – 400 animals

If the objectives with the Tonquin population are achieved, Parks Canada would consider potentially reintroducing captive-raised caribou into the Brazeau and Maligne caribou ranges where populations have or will have disappeared.

TBD

### End of conservation breeding program

The program is intended to be long-term but not permanent; however, it is too early to determine exactly when that endpoint will be. The program will be assessed periodically against key milestones to determine an end date.

VISION

### Self-sustaining caribou populations in the Jasper/Banff Local Population Unit.

