



Mute Swan Society of Canada
3 Leaves Terrace
Toronto, Ontario
M8Y 4H4

The Honourable Julie Dabrusin
Minister of Environment and Climate Change Canada
House of Commons
Ottawa, Ontario
K1A 0A6
Via email: Julie.dabrusin@parl.gc.ca

Re: Proposed Changes to Hunting Regulations for Tundra Swans

Dear Minister Dabrusin:

I am writing to share our submission to your Ministry on the introduction of a Tundra Swan hunting season, which is being proposed in Manitoba, Saskatchewan, and Alberta beginning as early as 2028.

The Mute Swan Society is a federally incorporated not for profit organization dedicated to the well-being of wild Mute Swans in Canada. Our leadership, Board of Directors, subscribers, and followers are committed to all swans in Canada and on principal oppose the establishment of a hunting season for any species of swan.

Most Canadians are not aware that such a hunt is being considered. We are confident that if they were aware the vast majority would find it abhorrent. That's because public values strongly favour humane relationships with wild animals. Hunters account for only 3% to 4% of the population and that number continues to drop. Pastimes which celebrate wild lives, including birdwatching and nature photography, are on the rise. For thousands of people, seeing Tundra Swans on migration is an awe-inspiring event.

Furthermore, swans hold a special place in the hearts and minds of Canadians. They are majestic, iconic birds that have been the subject of myth and art and a symbol of beauty and love for centuries. They are admired for their lasting pair bonds and the care both parents give to raising their young.

In addition to our principled opposition, the other reasons that a hunt should not proceed are outlined in our submission. I hope you will take the time to read it, but the key conclusions are summarized below:

There is no Population Rationale for a Hunt

- The population objective is to maintain numbers at or above current levels.
- There is no need to reduce the Tundra Swan population or its rate of growth.

There are Significant Risks of Killing of Other Species

- Trumpeter Swans were hunted to near extinction over a century ago and their reintroduction in Canada is a conservation success story.
- Whooping Cranes were decimated by habitat loss and overhunting, resulting in only 18 birds being counted by 1938. With conservation efforts they are slowly recovering but remain endangered

Canada-wide. Canada's responsibility for this species is very high as Canada is home to "100% of the naturally occurring breeding population."¹

- Both birds resemble Tundra Swans and share migratory routes meaning the potential for misidentification is real.
- While a mandatory reporting regime is outlined in the consultation document, studies show that hunters frequently misidentify species. Any reported rate of incidental harvest is prone to error and underrepresentation.
- The Trumpeter Swan and Whooping Crane recoveries should not be put at risk with the introduction of a Tundra Swan hunting season.

Tundra Swans Face Existing Risks

- Tundra Swans migrate thousands of kilometres every year, between their Arctic breeding grounds and their wintering habitat, with staging areas along the migration routes. Habitat degradation and climate change already present serious risks. "Oil/gas drilling and related activities pose the greatest potential threats to arctic breeding habitats of the Tundra Swan. Loss of wetlands at migratory stopover sites, particularly in the Prairie Pothole region, is also a concern."² The Audubon Society has projected a potential 61% loss of current winter range for Tundra Swans by 2080.³
- This projected loss of habitat will have a significant impact on the species' long-term survival.

Canada's Responsibility for Tundra Swans is Very High

- Our responsibility for the species is Very High because 95% of the global population breeds or migrates through Canada. That should preclude their hunting.

They are a Conservation Priority

- Tundra Swans are a conservation priority in a subregion that spans Alberta, Saskatchewan, and Alberta, where the hunt is being proposed. Their conservation priority should preclude their hunting.

There Would be an Impact on Survivors' Mortality and Future Breeding Success

- "Tundra Swans generally pair for life, and stay with their mate throughout the entire year. If one individual dies, the remaining bird can take years to find a new mate."⁴ On average, Tundra Swans do not begin breeding until their sixth year.⁵ "Cygnetts stay with parents throughout autumn and winter of first year, and in some cases, during subsequent winters too"⁶ and families start the spring migration together.⁷ This means that the loss of a single Tundra Swan can have significant impact on the survival of their offspring and their mate's future reproductive success.

¹ Birds Canada and Environment and Climate Change Canada. 2024. The State of Canada's Birds, Nature Counts and Environment and Climate Change Canada Species at Risk Public Registry, COSEWIC assessments

² Cornell Birds of the World

³ National Audubon Society

⁴ Birds Canada and Environment and Climate Change Canada. 2024. The State of Canada's Birds, Nature Counts

⁵ Cornell Birds of the World

⁶ Kear (2005). (Referenced in Cornell Birds of World)

⁷ Cornell Birds of the World

- The dependence of juveniles on their parents, the loss of a mate, and the length of time to find a new partner will result in increased mortality among survivors and declines in offspring beyond the 555 projected to be killed in a hunting season.

There are Alternatives to Agricultural Conflicts

- If a rationale for hunting Tundra Swans is to protect crops, there are humane deterrence strategies that can be employed.
- A hunting season would not be justified to protect agricultural interests.

Tundra Swans are not Fair Chase

- Tundra Swans are easy targets, not opportunities for fair chase.

Public values mean hunting any species of swan would be opposed by the vast majority of Canadians.

For that reason and all the reasons above, a Tundra Swan hunting season should not proceed. We hope you will ensure that it does not.

We look forward to your response.

Sincerely,



Kelly Duffin
President and Founder
kduffin@muteswansociety.org | 647 522 0718