

# Submission regarding Proposed Changes to Hunting Regulations for Tundra Swans



Submitted to Environment and Climate Change Canada  
Re: Consultation on Migratory Game Bird Hunting Regulations  
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February 14, 2026

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## Introduction

Environment and Climate Change Canada/the Canadian Wildlife Service is considering the establishment of a hunting season for Tundra Swans in Manitoba, Saskatchewan, and Alberta beginning as early as fall 2028.

The Mute Swan Society is opposed on principle to hunting any swan species in Canada, as we believe the vast majority of Canadians would be.

In addition to that principled opposition, the other reasons that a hunt should not proceed are outlined in this submission.

## Population

Population data do not provide a rationale for limiting Tundra Swans' population or its rate of growth.

### Overall Population

The population of Tundra Swans is relatively stable, though more information is required, especially related to breeding, staging, and wintering habitat. There is also high inter-annual variability and threats due to climate change and habitat loss. The goal is to remain at or above current population levels. Specifically:

- The "Christmas Bird Count [CBC] provides the best coverage of the overall national population [of Tundra Swans] and shows a moderate increase, but confidence is only medium. The Midwinter Waterfowl Inventory [MWWI] shows little change in the eastern population, with high confidence. All populations are within goal ranges."<sup>1</sup> The annual trend derived from the CBC is .74 between 1970 and 2021.<sup>2</sup> The MMWI indicates that since 1980 the population trend has been "little change."<sup>3</sup>

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<sup>1</sup> Birds Canada and Environment and Climate Change Canada. 2024. The State of Canada's Birds, Nature Counts

<sup>2</sup> Birds Canada and Environment and Climate Change Canada. 2024. The State of Canada's Birds, Nature Counts

<sup>3</sup> Birds Canada and Environment and Climate Change Canada. 2024. The State of Canada's Birds, Nature Counts

- **“Between 1983 and 2025, population indices fluctuate between 60,000 to 14,000, with increasing variability over time.** In 1983, population indices were close to 80,000.”<sup>4</sup> [emphasis added] The Population Index graphed in the Population Status of Migratory Game Birds in Canada 2025 illustrates a precipitous decline between 2021 and 2024.<sup>5</sup> The “fair bit of geographic and inter-annual variability in abundance” is also noted in the State of Canada’s Birds.<sup>6</sup>
- In addition, **“management plans for both [Eastern and Western] populations establish the need to collect more information, such as improving the Mid-Winter Waterfowl Survey to obtain better counts, developing breeding ground surveys to estimate breeding populations and trends, and identifying and protection of breeding, staging, and wintering habitats, and gathering more information on the Aboriginal harvest to better estimate the total harvest.”**<sup>7</sup> [emphasis added]
- **“The goal for the national population of Tundra Swan is to remain at or above its recent population level.”**<sup>8</sup> [emphasis added]

### Eastern (Manitoba and Saskatchewan) and Western (Alberta) Populations

- The target for the Eastern population of Tundra Swans is “to maintain a population index of at least 80,000 swans” based on a 3-year average from mid-winter surveys.<sup>9</sup> The consultation document reports that 92,755 was the population index from 2023 to 2025 and that the population may have reached carrying capacity.<sup>10</sup> If it is at carrying capacity, natural limiting factors will impact recruitment (which is the hatching of offspring and their survival to maturity) and mortality rates.
- **The Midwinter Survey indicates that, in the Eastern population, “there were 77.2 thousand Tundra Swans in 2025. This estimate is 21% below the 10-year average of 97.8 thousand birds. In 2025 the Eastern Population Tundra Swan was below the NAWMP population objective of 80,000 birds.”**<sup>11</sup> [emphasis added]
- The objective for the Western population of Tundra Swans is to “maintain a 3-year average population index of at least 60,000 Tundra Swans.”<sup>12</sup> The population index from 2022 to 2024 was 82,500 and may have reached carrying capacity,<sup>13</sup> which, again, would see recruitment and survival impacted by natural limiting factors. Short-term averages may disguise the degree of variability and possible declines. For instance, the Pacific Flyway Winter Tundra Swan Survey “indicates that there were 72.9 thousand swans in 2025, which is a slight decline from 72.4 thousand in 2024”<sup>14</sup> and well below the 82,500 2022 to 2024 index.

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<sup>4</sup> Environment and Climate Change Canada, Population Status of Migratory Game Birds in Canada – 2025

<sup>5</sup> Environment and Climate Change Canada, Population Status of Migratory Game Birds in Canada – 2025

<sup>6</sup> Birds Canada and Environment and Climate Change Canada. 2024. The State of Canada’s Birds, Nature Counts

<sup>7</sup> Wildlife Species Canada Bird Status

<sup>8</sup> Birds Canada and Environment and Climate Change Canada. 2024. The State of Canada’s Birds, Nature Counts

<sup>9</sup> Proposed changes to hunting regulations for the 2026-2027 and 2027-2028 seasons

<sup>10</sup> Proposed changes to hunting regulations for the 2026-2027 and 2027-2028 seasons

<sup>11</sup> Environment and Climate Change Canada, Population Status of Migratory Game Birds in Canada – 2025

<sup>12</sup> Proposals to amend the Canadian Migratory Birds Regulations – 2026 consultation document

<sup>13</sup> Proposals to amend the Canadian Migratory Birds Regulations – 2026 consultation document

<sup>14</sup> Environment and Climate Change Canada, Population Status of Migratory Game Birds in Canada – 2025

## Risks

- Tundra Swans migrate thousands of kilometres every year, between their Arctic breeding grounds and their wintering habitat, mostly in the southern US, 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.”<sup>15</sup> The Audubon Society has projected a potential 61% loss of current winter range for Tundra Swans by 2080.<sup>16</sup>
- This projected loss of habitat will have a significant impact on recruitment and survival.

## Conclusions

- The high variability of the overall population means that a three-year trendline is insufficient to draw population conclusions or inform management decisions.
- More information is also required on breeding, staging, and wintering habitat.
- Habitat loss threatens Tundra Swans’ long-term survival.
- **There is no need to reduce the Tundra Swan population or its rate of growth (where and if it is growing).**

## Canada’s Responsibility

“Approximately 180,000 individuals breed in Canada, accounting for 64% of the global population. Another 30,000 breed in Alaska and migrate to or through Canada, boosting the total to 95% of the global population, which corresponds with **very high responsibility.**”<sup>17</sup> [emphasis added]

### Conclusion

- **Our very high responsibility for Tundra Swans should preclude their hunting.**

## Conservation Priority

Tundra Swans are a conservation priority in the Boreal Taiga Plains Bird Conservation subregion, which includes large parts of Alberta, Saskatchewan and Manitoba.<sup>18</sup> According to Canada’s Bird Conservation Region Strategies, the conservation reasons for a species to be identified as a priority include “species vulnerable due to population size, distribution, population trend, abundance, or threats.”<sup>19</sup>

### Conclusion

- **Tundra Swans’ conservation priority and vulnerability should preclude their hunting.**

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<sup>15</sup> Cornell Birds of the World

<sup>16</sup> National Audubon Society

<sup>17</sup> Birds Canada and Environment and Climate Change Canada. 2024. The State of Canada’s Birds, Nature Counts

<sup>18</sup> Wildlife Species Canada Bird Status

<sup>19</sup> Wildlife Species Canada Bird Status

## Impact on Recruitment

“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. Even within flocks of hundreds of individuals, Tundra Swans stick close to their mate to keep their bond strong.”<sup>20</sup>

On average, Tundra Swans do not begin breeding until their sixth year.<sup>21</sup> “Cygnetts stay with parents throughout autumn and winter of first year, and in some cases, during subsequent winters too”<sup>22</sup> and families start the spring migration together.<sup>23</sup>

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.

The consultation document estimates that 555 Tundra Swans would be killed in the annual hunt but given that many of those killed would invariably be breeding individuals, there would be some associated offspring mortality and a decline in broods for years to come.

### Conclusion

- 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 recruitment beyond the 555 projected to be killed in a hunting season.

## Risks of Killing of Other Species

A Tundra Swan hunt would present real risks of killing non-target species that are recently recovered or still endangered.

While a reporting regime is outlined in the consultation document, any reporting will underrepresent the reality. There may be many conscientious and knowledgeable hunters, but there are persistent issues with misidentification and self-reporting, even with mandatory requirements and photographs.

A 2019 survey of waterfowl hunters, which included avid hunters viewing photographs of birds in breeding plumage, found that “79% misidentified at least one photograph.”<sup>24</sup> In a 1995 assessment of hunters’ in-hand identification of duck species, hunters averaged only 4.6 correct out of 8 ducks (~57.5% accuracy).<sup>25</sup>

**The odds of other species being killed is significant. Any reported rate of incidental harvest is prone to error and underreporting.**

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<sup>20</sup> Birds Canada and Environment and Climate Change Canada. 2024. The State of Canada’s Birds, Nature Counts

<sup>21</sup> Cornell Birds of the World

<sup>22</sup> Kear (2005). (Referenced in *Cornell Birds of World*)

<sup>23</sup> Cornell Birds of the World

<sup>24</sup> Ahlers, A.A. & Miller, C.A. (2019). *Testing waterfowl hunters’ waterfowl identification skills. Wildfowl*, **69**, 206-220

<sup>25</sup> Wilson, H.M. & Rohwer, F.C. (1995). Assessment of hunters in-hand identification of duck species. (Referenced in *Ahlers & Miller, 2019*).

## Trumpeter Swans

Trumpeter Swans were hunted to near-extirpation over a century ago and their reintroduction in Canada is a conservation success story. Their recovery should not be put at risk with a swan hunting season that could result in the accidental killing of Trumpeters. The risk is considerable. In Utah, where there is a Tundra hunting season, the season is shut down when 20 Trumpeters are accidentally shot, which has happened more than once.<sup>26</sup>

While they are now a self-sustaining species, as recently as 2020, Trumpeter Swans were at an increased level of risk Canada-wide, vulnerable in Saskatchewan, and imperiled in Manitoba. While they were apparently secure in Alberta by 2020, they were still imperiled there in 2015.<sup>27</sup>

In Manitoba and Alberta, the population of Trumpeter Swans is growing, including on migration routes that overlap with Tundra Swans. In Saskatchewan, the Trumpeter Swan population is not growing at the high rate seen elsewhere.<sup>28</sup> In that province, the Trumpeter recovery should not be put at risk with a Tundra hunting season. In all three provinces being considered for a hunt, the proximity of the two species increases the risk of accidental takes.

Canada has very high responsibility for the Rocky Mountain population of Trumpeter Swans. The 11,000 swans in this population represent 95% of its total. Breeding ranges for Trumpeter Swans in this population include parts of Alberta and western Saskatchewan.<sup>29</sup>

The goal for all three Trumpeter Swan populations in Canada is to remain at or above their recent population levels.<sup>30</sup>

## Whooping Cranes

Like Tundra Swans, Whooping Cranes are large birds with dark feet and beaks and plumage that is mostly white at maturity with some dusky feathers in juveniles. Whooping Cranes could be mistaken for Tundra Swans.

Whooping Cranes historically numbered close to 10,000, but habitat loss and overhunting resulted in there being only 18 individuals by 1938. By 1970, 57 birds were counted in their wintering grounds in Texas. As a result of conservation efforts, the population rose to 537 individuals by 2022/23.<sup>31</sup> That continuing and precarious recovery should not be put at risk with a Tundra Swan hunting season that could result in the accidental killing of Whooping Cranes.

**Canada's responsibility for this species is very high as Canada is home to "100% of the naturally occurring breeding population."**<sup>32</sup> [emphasis added] The only remaining self-sustaining wild

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<sup>26</sup> Salt Lake City News, October 27, 2025

<sup>27</sup> Wild Species Trumpeter Swan (*Cygnus buccinator*)

<sup>28</sup> Proposals to amend the Canadian Migratory Birds Regulations – 2026 consultation document

<sup>29</sup> Birds Canada and Environment and Climate Change Canada. 2024. The State of Canada's Birds, Nature Counts

<sup>30</sup> Birds Canada and Environment and Climate Change Canada. 2024. The State of Canada's Birds, Nature Counts

<sup>31</sup> Birds Canada and Environment and Climate Change Canada. 2024. The State of Canada's Birds, Nature Counts (and COSEWIC, 2010 referenced)

<sup>32</sup> 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

population of Whooping Cranes is around Canada's Wood Buffalo National Park, in Northwest Territories and Alberta.<sup>33</sup>

Canada-wide they are endangered and below the goal population. They remain critically imperiled in Alberta and possibly extirpated in Saskatchewan and Manitoba.<sup>34</sup> They are a conservation priority in the Boreal Taiga Plains Bird Conservation subregion.

The risk of accidental killing of Whooping Cranes is considerable because of their overlapping migratory routes, which include Alberta, Saskatchewan, and western Manitoba.<sup>35</sup> **The prairie provinces where a Tundra hunt is being considered are critical migration zones for this species.**

The Species at Risk Act (SARA) goal is recovery with the objective of 1,000 individuals by 2035<sup>36</sup> but recovery is slow, in part because of the small number of breeding individuals and also because "small clutch sizes...further limit population growth."<sup>37</sup> Whooping Cranes typically mate for life, so the loss of any breeding individual is a setback to their recovery.

## Conclusions

- Given the proximity of Tundra Swans to Trumpeter Swans and Whooping Cranes, the potential for misidentification is real.
- Even mandatory reporting requirements would underrepresent accidental takes.
- **The Trumpeter Swan and Whooping Crane recoveries should not be put at risk with the introduction of a Tundra Swan hunting season.**

## Alternatives to Agricultural Conflicts

If a rationale for hunting Tundra Swans is to protect crops, there are humane deterrence strategies that could be employed.

### Conclusion

- A hunting season would not be justified to protect agricultural interests.

## Not Fair Chase

Boone and Crockett defined fair chase as not giving "the hunter an unfair advantage over the game animals." Swans are large, highly visible birds, who are not swift on land, need long "runways" to take off, require some time to get any real altitude, and have fairly regular flight trajectories once they do.

### Conclusion

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

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<sup>33</sup> Wildlife Species Canada Bird Status

<sup>34</sup> Wild Species Whooping Crane (*Crus americana*)

<sup>35</sup> Environment and Climate Change Canada, Species at Risk Public Registry, COSEWIC Assessments Whooping Crane

<sup>36</sup> Birds Canada and Environment and Climate Change Canada. 2024. The State of Canada's Birds, Nature Counts

<sup>37</sup> Wildlife Species Canada Bird Status (*referencing Lewis 1995, COSEWIC 2010*)

## Public Opinion

Values are evolving. **There is growing awareness of animal sentience and a steady shift toward more humane relationships with wild animals.** An increasing majority of Canadians support policies that reflect compassion and coexistence.

There is decreasing public support for wildlife culling and lethal control methods, strong youth engagement with animal welfare, and a broader societal trend toward plant-based lifestyles and ethical consumer choices.

Hunters account for only 3% to 4% of the population and that number continues to drop. Public support for hunting and for eating animals has been decreasing steadily for many years, with an annual decline of 5% in one year alone (2023 v 2024).<sup>38</sup> Over 80% of Canadians oppose hunting animals for sport.<sup>39</sup> At the same time, pastimes which celebrate wild lives, including birdwatching and nature photography, are on the rise. For these Canadians, seeing Tundra Swans on migration is an awe-inspiring event.

All species of 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.

**Hunting any species of swan would be opposed by the vast majority of Canadians.**

### Conclusion

- There would be no broad public support for a Tundra Swan hunt.

## Summary and Conclusions

In addition to objecting on principle, the population data that exist provide no evidence of a need to reduce the Tundra Swan population or its rate of growth. The high variability in the population numbers and many unknowns make the data we have insufficient to draw population conclusions or inform management decisions. Tundra Swans already face risks to their survival due to habitat loss and climate change.

The population objective is to maintain numbers at or above current levels.

Tundra Swans are a conservation priority and Canada's responsibility for the species is very high.

The Trumpeter Swan and Whooping Crane recoveries should not be put at risk with the introduction of a Tundra Swan hunting season where the possibility of shooting non-target species is real and significant.

There are humane alternatives to any agricultural conflicts.

Public sentiment would not be supportive of hunting any swan species.

**For all these reasons, a Tundra Swan hunting season should not proceed.**

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<sup>38</sup> Research Co. annual survey

<sup>39</sup> Animal Justice

## **About the Mute Swan Society of Canada**

The Mute Swan Society is a federally incorporated not for profit organization, dedicated to the well-being of wild Mute Swans in Canada. The Society is committed to fact-based decisions about Mute Swans' lives. To that end we monitor and share research and offer public education. Our annually updated review of the scientific literature is available here: <https://muteswansociety.org/literature-review-discussion.pdf>

Our leadership, Board of Directors, subscribers, and followers are committed to all swan species in Canada and oppose the establishment of a hunting season for any of them.