

December 11, 2023

Paula Brand
Director, Species at Risk Act Policy Division
Canadian Wildlife Service
Environment and Climate Change Canada
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Dear Director Brand,

Safari Club International Canada (SCI Canada), on behalf of the more than 70,000 members and advocates of its parent organization Safari Club International (SCI), submits this comment letter **in opposition** to Environment and Climate Change Canada's (ECCC) proposed Order to amend Schedule 1 of the Species at Risk Act (SARA) to uplist the Eastern Wolf. SCI Canada opposes the proposed Order for two main reasons.

First, the proposed Order is unclear about the impact that the uplisting will have on Canada's hunters. Hunting prohibitions are already in place in the wolf's core areas, including prohibitions on coyote hunting. An uplisting may cause other areas to be closed to hunting to the detriment of hunters. SCI Canada strongly opposes the closure of existing hunting opportunities in Ontario and Quebec. Additional closures are unwarranted and could erroneously limit otherwise legal and much-needed canid hunting.

Second, the proposed Order also does not justify the uplisting. Notably, no evidence suggests that the Eastern Wolf is declining in population; rather, the latest studies conclude that the total population is stable. Furthermore, harvest is already prohibited in the wolf's core areas. ECCC has thus far failed to explain how the uplisting will benefit the wolves in any way or that a threatened listing is necessary to prevent ongoing negative impacts to species.

SCI Canada respectfully requests that ECCC decline to adopt the proposed Order. Eastern Wolf populations are stable, and an uplisting is not warranted.

Sincerely,

Eric Moland
Chair
Safari Club International Canada