



October 6, 2025

DELIVERED VIA EMAIL

WildlifePolicy@ontario.ca

To Whom It May Concern,

RE: Proposals to reduce regulatory and administrative burden, and enable increased economic opportunities for licensed trappers and fur dealers (ERO #025-0781)

Please accept the following submission on behalf of AEL Advocacy and The Fur-Bearers in response to the Ministry of Natural Resources' (the "Ministry") proposals to reduce regulatory and administrative burden, and enable increased economic opportunities for licensed trappers and fur dealers (the "Proposals") (ERO #025-0781).¹

We write to express our strong opposition to the proposed changes on the following grounds: (1) lack of key information for the public to fully understand the proposals; (2) negative impacts to animal welfare; and (3) harmful ecological and public interest consequences.

A. Background on AEL Advocacy and The Fur-Bearers

Animal Environmental Legal Advocacy ("AEL Advocacy") is a public interest law practice and registered charity based in Ontario. Our lawyers understand the important interconnection between humans, animals, and the environment. We leverage our legal and political expertise to support individuals, communities, and organizations working to protect animals and the environments where they live.

The Fur-Bearers, established in 1953, is a registered charity working to protect fur-bearing animals through conservation, advocacy, research and education in Canada.

¹ <https://ero.ontario.ca/notice/025-0781>

B. Our Comments on the Proposals

1. Lack of Key Information

The Environmental Registry of Ontario (“ERO”) posting states:

“[t]he environmental consequences of the proposed regulatory changes are anticipated to be minimal ... because the number of beaver trapped in these situations are generally animals that would otherwise be harvested according to established quotas during the open season.”²

No supporting evidence, data, or impact assessments have been provided to substantiate this claim. Without such information, stakeholders cannot meaningfully evaluate risks to animals or the environment.

The failure to publish supporting research directly undermines public participation and contravenes the spirit of the *Environmental Bill of Rights, 1993* (“EBR”). Members of the public should not be required to contact the Ministry or industry groups to request research; all relevant information should be proactively disclosed and easily accessible as part of the consultation record.

This lack of transparency is part of a troubling pattern. For example:

- In 2024, the government proposed regulatory changes related to restraining snares without releasing the cited “research findings,” prompting The Fur-Bearers to appeal to the Information and Privacy Commissioner.³
- AEL Advocacy has likewise documented failures by the Ministry to disclose supporting documents in other environmental decision-making processes.⁴

The Auditor General’s 2024 *Performance Audit on the Environmental Bill of Rights* found that:

“18% of the proposal notices we reviewed left out important information for the public to fully understand the proposals, including about their environmental implications.”⁵

² <https://ero.ontario.ca/notice/025-0781>

³ See The Fur-Bearers’ submission on this proposal here: <https://thefurbearers.com/wp-content/uploads/2024-06-27-ERO-019-8071-Submission-3.pdf>, and an update on their appeal here: <https://thefurbearers.com/blog/ontario-changes-trapping-regulations-denies-access-to-trap-research/>; and AEL Advocacy’s here: https://www.aeladvocacy.ca/files/uqdc883e8_eb88e3f50d7b4086ab725344c63fdaa0.pdf

⁴ See for example: https://www.aeladvocacy.ca/files/uqdc883e8_1c4475d98e774da5b5316af53c1e5dae.pdf

⁵ https://www.auditor.on.ca/en/content/annualreports/arreports/en24/pa_EBR_en24.pdf

Animal Environmental Legal Advocacy

PO Box 74171, RPO Beechwood, Ottawa, ON K1M 2H9
Canadian Charitable Registration #76952 0404 RR0001
admin@aeladvocacy.ca • aeladvocacy.ca

This current proposal (ERO #025-0781) appears to fall squarely within this concerning trend. The absence of supporting evidence for regulatory changes that directly affect wildlife undermines meaningful public participation and diminishes confidence in Ontario's environmental decision-making processes.

Additionally, the Ministry's analysis omits animal welfare impacts, despite the Ministry's Statement of Environmental Values ("SEV"), which commits to:

*"The protection and conservation of natural resources, including plant life, animal life and ecological systems."*⁶

The SEV also requires the Ministry to recognize the finite capacity of ecosystems and to account for environmental, social, and economic values, impacts, and risks.

While the ERO posting briefly considers environmental, social, economic, and administrative impacts, it fails to include any analysis of animal welfare implications. This omission is significant, given that the Proposals directly increase risks of harm to wildlife through expanded killing methods, increased beaver trapping on Crown land, and weakened oversight of the fur trade.

2. Negative Impacts to Animal Welfare

The Proposals introduce several regulatory changes that would increase risks of pain, injury, and suffering for fur-bearing mammals.

Expanded killing methods

The Ministry is proposing to allow trappers to kill lawfully trapped furbearers after dark with any rim-fire caliber firearm, including rifles and federally authorized pistols. Current regulations restrict this practice to rim-fire rifles only.⁷

While framed as a measure to "reduce barriers for licensed trappers," authorizing pistols after dark raises serious welfare concerns. Pistols are less accurate than rifles, particularly in low-light conditions, and are more likely to cause non-lethal wounding or prolonged suffering if the animal is not killed instantly.^{8,9}

⁶ <https://ero.ontario.ca/page/sevs/statement-environmental-values-ministry-natural-resources-and-forestry>

⁷ O. Reg. 667/98: Trapping, Fish and Wildlife Conservation Act, 1997, O Reg 667/98, last amended by O Reg 197/25, Government of Ontario online: <https://www.ontario.ca/laws/regulation/980667> ss 27.1(1)(a)(b), 27.1(2).

⁸ <https://www.quebec.ca/en/tourism-and-recreation/sporting-and-outdoor-activities/trapping/general-rules#c147292>

⁹ <https://calibremag.ca/firearm-faqs-is-it-legal-to-shoot-at-night/>

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The Ministry has provided no evidence that this change would “support humane trapping practices” or align with best practices in wildlife management. Instead, it appears designed to prioritize trappers’ convenience at the expense of animal welfare.

Sale of raw beaver castoreum

The Proposals would also permit licensed fur dealers to sell raw beaver castoreum—a secretion produced by the castor sacs of beavers and used for marking territory and dam maintenance. The ERO posting asserts that castoreum “has important applications in the food (e.g., flavouring) and perfume industry.” While it was historically used in these industries, demand today is negligible, and synthetic alternatives are widely available.¹⁰

The stated rationale—that the sale “will provide additional economic opportunities for fur dealers for a product that would otherwise be a wasted by-product from lawfully harvested beaver”—fails to justify the change. Because castoreum can only be collected post-mortem, legalizing its sale introduces an additional financial incentive to trap and kill beavers. This could drive unnecessary increases in beaver mortality while providing only marginal economic benefits to a small number of fur dealers.

3. Harmful Ecological and Public Interest Consequences

Beyond animal welfare concerns, the Proposals also present serious risks to Ontario’s ecosystems on which we and animals rely, and public trust in environmental governance.

Threats to keystone species and ecosystems

Beavers are widely recognized as a keystone species. Their dams create wetlands that provide habitat for countless other species, improve water quality, and regulate water flow—reducing the risks of both drought and flooding.¹¹ These ecological services are particularly critical in the context of climate change and increasing pressures on Ontario’s landscapes.

The proposed regulatory changes would expand the circumstances under which beavers can be trapped. Trappers would be authorized to remove beavers that are damaging, or are about to damage, private property even when the dams are not

¹⁰ <https://www.cspi.org/chemical-cuisine/castoreum>

¹¹ <https://parks.canada.ca/pn-np/mb/riding/nature/animals/mammals/castors-beavers>

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located on the land in question. Additionally, the Proposals would permit the removal of beavers from Crown (public) lands to protect critical infrastructure, such as provincial roads, highways, and railways. The ERO posting asserts that “environmental consequences are anticipated to be minimal because the number of beavers trapped in these situations are generally animals that would otherwise be harvested according to established quotas during the open season.”

However, authorizing increased trapping—even under these circumstances—risks disrupting the essential ecological functions provided by beavers precisely when they are most needed to sustain biodiversity and manage water systems. Premature or indiscriminate removal of beavers can lead to long-term degradation of wetlands, loss of species habitat, and weakened provincial climate adaptation capacity.¹²

These ecological risks are compounded by the additional economic incentives created under the Proposals, such as permitting the sale of raw beaver castoreum. Expanding financial motivations to trap beavers threatens the integrity of these critical ecological services, undermining the role that healthy beaver populations play in maintaining wetlands, supporting biodiversity, and bolstering climate resilience:

“They are considered “ecosystem engineers,” recognized for their ability to construct dams and create ponds. And while some might consider beavers to be pests, they can actually help us manage water-related issues such as drought, flooding, and water pollution.”¹³

Reduced oversight of licensed fur dealers

The proposed regulatory changes would significantly undermine transparency and public accountability by eliminating the requirement for licensed fur dealers to submit annual reports to the Ministry. Currently, these reports provide one of the few mechanisms for monitoring the volume and species of pelts traded in Ontario, ensuring a basic level of oversight in a largely under-regulated sector.¹⁴

Under the proposals, fur dealers would no longer be required to submit these reports, though they would still need to retain records for five years and make them available to the Ministry upon request. The Ministry would also maintain the ability to impose license conditions to address specific compliance issues.

¹² <https://parks.canada.ca/pn-np/mb/riding/nature/animals/mammals/castors-beavers>

¹³ <https://parks.canada.ca/pn-np/mb/riding/nature/animals/mammals/castors-beavers>

¹⁴ <https://ero.ontario.ca/notice/025-0781#supporting-materials>

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The Ministry justifies this change as a means to “reduce burden on small businesses.” However, eliminating this reporting obligation would obscure the true scale of trapping activity, make irregularities harder to detect, and further conceal the number of animals killed for their pelts. Without mandatory reporting, the risk of illegally obtained furs entering the market increases, while transparency and public oversight decrease. In a sector already characterized by limited regulation, removing even this modest safeguard represents a step backward for both animal welfare and regulatory enforcement.

Although these regulatory changes are framed as reducing the “burdens” on licensed fur dealers, when combined with other proposals, they could unintentionally push beaver trapping to unsustainable levels by creating new avenues for profit. For instance, permitting the sale of castoreum—a by-product of lawfully harvested beaver that would otherwise go to waste—introduces additional economic incentives that may further increase trapping pressure on the species.¹⁵

C. Recommendations and Conclusion

For the reasons set out above, AEL Advocacy and The Fur-Bearers strongly oppose the Proposals. We urge the Ministry to:

1. Withdraw the Proposals in their current form.
2. Release all scientific documentation, environmental impact assessments, and data related to the Proposals.
3. Extend the public comment period to provide stakeholders time to review and respond to this evidence.
4. Integrate animal welfare analysis into all regulatory proposals affecting wildlife, consistent with the Ministry’s Statement of Environmental Values.

Thank you for the opportunity to comment. We would welcome further engagement with the Ministry on these important issues.

Sincerely,



Kira Berkeley
Co-Director & Counsel
AEL Advocacy



Lesley Fox
Executive Director
The Fur-Bearers

¹⁵ <https://ero.ontario.ca/notice/025-0781#supporting-materials>