



Ontario Fur Managers Federation

531 Second Line E
Sault Ste Marie, ON P6B 4K2
Phone: (705) 254-3338
Fax: (705) 254-3297
www.furmanagers.com

June 06, 2024

Public Input Coordinator
MNRF Fish and Wildlife Policy Branch – Wildlife Section
300 Water Street
5th Floor, North Tower
Peterborough, ON K9J 3C7

Dear Public Input Coordinator,

Re: ERO 019-8071 Amendments to Ontario Regulation 667/98 (Trapping) made under Fish and Wildlife Conservation Act, 1997, to update technical specifications of relaxing cable restraints used for trapping

On behalf of the Ontario Fur Managers Federation and our 6000 members, we would like to recognize the Ministry of Natural Resources and Forestry (MNRF) for taking the time to listen to the concerns that trappers raised in regard to Relaxing Cable Restraints (RCRs) and making the necessary changes to the regulations. The OFMF is supportive of the proposed changes, as these are the component specifications that trappers have been requesting since RCRs were first implemented in Ontario.

The OFMF formally requested that the MNRF change the RCR component regulations, in June of 2023, to reflect the original Wisconsin design that was tested in Ontario. This included increasing the weight rating of the breakaway device and decreasing the deer stop loop size. When the Ontario regulations were put into effect, the specifications for both features were changed from the Wisconsin design to a lighter weight rating and a larger deer stop loop size, without any adequate explanation.

The OFMF requested that the regulation be changed to allow for RCR that have a breakaway mechanism affixed at the relaxing lock that is rated at 158.8 kg (350 lbs) or less. This was because we had thorough data from trappers to show that the breakaway devices were failing well short of their weight rating which was leading to loss of coyotes. Additionally, the Fur Institute of Canada's Trap Research and Development Committee (TRDC) recently tested snares specifically for coyotes and recommended that the lightest approved breakaway device is 285 lbs. It is clear that the existing allowable breakaway devices are far too light for coyotes in Ontario, and the use of them is leading to the loss of coyotes and RCRs. The OFMF is supportive of the proposed increase in weight rating as it will ensure the RCRs can function as they are intended to.

The OFMF also requested that the deer stop loop size regulation be changed so that the cable loop cannot be restricted to be smaller than 6.4 cm in diameter. Currently, Ontario's deer stop is positioned so that it cannot become smaller than 8.9 cm in diameter, which is too large. The intention of the stop is to allow for deer to safely step out of an RCR if they happen to encounter one, which can be done at 6.4 cm in diameter. The issue with the increase to 8.9 cm is that the loop size remains too large when a smaller non-target animal, such as a fox, becomes held by an RCR. In communication with one of the original Wisconsin based trainers for RCR use, they stated that "the reason for this [size] is the loop is able to close tight enough to stop the cable from spinning on the animals neck (especially a fox). If this happens you will get much more fur damage the cable could cut the animals throat." In the same communication, that individual assured us that all of Ontario's initial RCR testing was done with Wisconsin RCRs, which had this smaller deer stop loop size. It is unclear why this change was ever made and as such, the OFMF is supportive of the proposed reduction in the deer stop loop size so that it cannot be restricted to be smaller than 6.4 cm in diameter.

The OFMF fully supportive of this proposal and is pleased that the concerns of trappers are being heard and addressed by the MNRF on this issue. The proposed changes to the RCR specifications will make RCRs more effective and safer for use in Ontario. This will benefit trappers and wildlife by ensuring that RCRs hold coyotes properly and that non-target animals are not injured.

Thank you,

A handwritten signature in black ink, appearing to read 'La Tonelli', with a stylized, cursive script.

Lauren Tonelli
General Manager

cc:
OFMF Executive Board