



**ANIMAL  
ALLIANCE  
OF CANADA**

*Animal  
Protection  
Through  
Education &  
Advocacy*

October 6, 2025

## **Environmental Registry of Ontario**

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

While we recognize the economic challenges facing small businesses in Ontario and globally, we respectfully oppose the proposed regulatory changes and urge an approach favoring the future needs of Ontarians and the international marketplace.

The government is proposing four changes, which we address sequentially.

#### **Proposal #1: Expand business opportunities for licensed fur dealers**

- Castoreum is a byproduct from lawfully trapped beaver that has important applications in the food (e.g. flavoring) and perfume industry. The value and marketability of castoreum is dependent on it remaining in a raw untreated form.
- Licensed fur dealers are the primary individuals who would purchase castoreum from trappers and then resell to other fur dealers or export to the global market in the same raw untreated form.
- Existing regulations restrict the selling of raw beaver castoreum by licensed fur dealers.
- We are proposing changes to regulations that would enable licensed fur dealers to lawfully sell raw castoreum and thereby provide economic benefits to small business fur dealers in Ontario.

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#### **Response to Proposal #1:**

This approach undermines wildlife conservation and ethical standards.

Expanding markets for raw castoreum will increase economic incentives for beaver trapping under the guise of economic opportunity to service a demand that is low and decreasing. This incentivizes intensified trapping activity, which will place undue pressure on beaver populations and disrupt

aquatic ecosystems. Castoreum is obtained through the killing of beavers, and the apparent hope that there will be new commercial markets for this product — particularly a product not essential to the market it serves — conflicts with growing public concern around animal welfare and ethical sourcing.

### Risk of Loopholes and Regulatory Evasion

Allowing the trade of raw castoreum creates potential enforcement challenges. It opens the door for unregulated or illegal wildlife products to enter the market under the guise of being legally sourced. This is no idle concern: While it is, for obvious reasons, impossible to know the exact value of the illegal trade in wildlife products, it is in the billions of dollars annually, second only to the illegal trade in drugs, and is invariably fueled by efforts to increase demand for products, and is often facilitated by the ability to “launder” illegal products through such lax legislation as is being proposed<sup>1</sup>. The raw, untreated nature of castoreum makes traceability difficult, increasing the risk of laundering castoreum harvested outside of lawful methods or humane standards.

### Reputational Risks and Consumer Backlash

Ontario’s international reputation will be negatively impacted by expanding trade in controversial animal byproducts. Global markets — particularly in Europe and parts of North America, but also in many other regions — are increasingly sensitive to products derived from animal trapping.

Supporting the trade of raw castoreum will expose local businesses to boycotts or consumer resistance, particularly from buyers who prioritize ethical sourcing and cruelty-free ingredients in food and cosmetics in Canada and abroad.

### Commercializing More Animal Byproducts

Once restrictions on raw castoreum are lifted, similar arguments could be made for other animal byproducts, gradually eroding Ontario’s wildlife protection standards and

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<sup>1</sup> <https://www.thegef.org/what-we-do/topics/illegal-wildlife-trade>

exposing vulnerable species to increased commercial exploitation. There is a reason why the commercialization of wild or natural “resources” must be very closely monitored and regulated; it is because of the vast, well-documented history of poorly-regulated or no monitoring/control of commercial utilization that has been an enormous driver of endangerment, extinction, and irreparable damage to the environment’s ability to sustain commercial enterprise and support human interests.

Rather than expanding trade in raw castoreum, Ontario should prioritize sustainable, ethical economic development that aligns with public values and modern standards of environmental stewardship.

### The Current Landscape

According to information from the Ontario government as of March 2019, there are approximately 8,700 licensed trappers in Ontario.

The reality is that trappers form a mere 0.09% of Ontario’s work force (of approximately 8.9 million) and most such trappers are part-time or hobby trappers. The diminishing few who have serious economic dependence on trapping fur-bearing mammals, including many Indigenous people in remote areas where employment opportunities are few in number, have been hurt by the development of fur-farms flooding the market with furs of a higher quality and greater consistency of quality than ever can be produced by the trapline.

Beaver are not farmed, but now the government proposes to incentivize beaver trapping, thus increasing the amount of fur, already in decreasing demand. This will increase supply, thus decrease per unit value, to the further economic detriment of full-time trappers, or trappers with significant dependence on the value of furs.

Our concern is that the subsequent removal of restrictions and monitoring of traplines, and increase in value of beaver beyond what high quality pelts can provide, will again see the decline and local extirpation of beavers, just as it did before such restrictions evolved to protect the viability of beaver populations. That is all the more important given our growing understanding of the importance of beavers in restricting the damage of forest fires.

We urge regulators to reject this proposal and instead invest in modern opportunities for small business development that looks to developing and future market demands.

### **Proposal #2: Reduce reporting burden for licensed fur dealers**

- Licensed fur dealers are required to report activities carried out under the authority of their licence and submit these reports to the ministry each year.
- Fur dealer reports are recognized as a key regulatory burden experienced by these small businesses.
- We are proposing changes that would remove the requirement for fur dealers to submit a report to the ministry, subject to certain requirements:
  - Fur dealers would be required to keep records on file for five years and make those records available to the ministry upon request.
  - The ministry would retain the ability to add conditions to a licence, as needed, to address specific compliance issues.

### Response to Proposal #2:

Reporting should be mandatory for appropriate and adequate population monitoring and management. The reasons for this contribute to what has allowed Ontario fur trapping to be more or less sustainable (some species, including beaver, were less numerous even under the regulations then in play) and evolved over time to serve that purpose. Going back to what did not work in earlier times is counterproductive, especially given the now recognized value of beavers in mitigating the drying effects of a warmer planet, and the availability of non-lethal methods of reducing or eliminating any problems beavers might create.

Annual reporting plays a vital role in maintaining oversight of the fur trade, ensuring that fur dealers are operating within legal and ethical boundaries. Removing this mandatory reporting requirement severely limits the Ministry's ability to monitor trends, detect irregularities, and respond proactively to compliance issues. Relying on reactive audits or inspections "upon request" is not a substitute for systematic, routine data collection.

### Increased Risk of Non-Compliance and Illegal Activity

Without mandatory submissions, there is a higher risk that dealers may fail to maintain accurate or complete records. This could unintentionally (or deliberately) facilitate the laundering of illegally trapped furs or unreported sales, undermining conservation efforts and enforcement of wildlife protection laws. The fur trade, by its nature, relies on responsible stewardship of wildlife resources — something that cannot be guaranteed without regular, verifiable reporting.

### Public Accountability and Data Transparency Are Compromised

Fur dealer reports are not just bureaucratic exercises; they are a critical source of data for the public, researchers, and policymakers. This information helps track wildlife use, market activity, and trends in the trapping industry as well as changes in beaver population density.

Beavers are eco-engineers and their dam-building influences their environment's capacity to support numerous other wildlife species, including game species such as American Black Ducks, and species in decline. Yearly knowledge of beaver population status is important for the conservation of other Ontario wildlife species, including those, such as turtles, listed under the *Endangered Species Act*.

Eliminating the reporting requirement reduces transparency and may diminish public trust in how the government is managing resources, especially in a sector already subject to ethical scrutiny and concerns about precipitous declines in various aquatic species of native wildlife.

### Record-Keeping Alone is Insufficient

Requiring fur dealers to retain records for five years is not a meaningful safeguard if there is no routine mechanism for reviewing those records. Without annual reporting, the Ministry will lack the capacity or resources to audit or assess proactively most dealers' activities, rendering the retained records largely symbolic.

## A Better Approach: Streamlining, Not Eliminating Reporting

If the reporting process is too burdensome, the solution should be to modernize and streamline it — such as by digitizing forms or simplifying data entry requirements — rather than eliminating it altogether. Responsible business practices should include basic annual reporting, especially for those dealing in wildlife products.

The proposed regulatory rollback sacrifices critical oversight and accountability for minor administrative convenience. We oppose this proposal and encourage exploring other ways to improve the efficiency of the reporting process while maintaining its essential function in supporting transparency, compliance, and responsible wildlife management.

### **Proposal #3: Burden reduction for trappers dispatching lawfully trapped furbearers after dark**

- Many trappers maintain full-time or part-time jobs and supplement their income with trapping. This often requires licensed trappers to check their traps as it becomes dark and requires them to humanely dispatch legally trapped furbearers after dark.
- Dispatch of live-trapped furbearing mammals by firearm is considered the most humane method available to trappers.
- Current regulations allow trappers to humanely dispatch lawfully trapped furbearing mammals after dark with a rim-fire rifle.
- Many trappers are federally authorized to carry a pistol firearm in the course of their trapping activities/business for dispatching furbearing mammals.
- We are proposing changes that would enable trappers to humanely dispatch lawfully trapped furbearers after dark with any rim-fire caliber firearm (including a rifle or a federally authorized pistol firearm).
- This proposed change supports humane trapping practices, while reducing barriers for licensed trappers.

Response to Proposal #3:

We oppose this proposed regulatory change.

### Public Safety Concerns

Expanding the use of firearms, including pistols, for dispatching furbearers after dark creates significant risks to public safety. Many regions where trapping occurs are populated by non-trapping residents, recreational hunters, and outdoor enthusiasts. The discharge of firearms, particularly in residential or semi-urban areas, heightens the risk of accidental injury or death, especially when conducted in low-light conditions.

The proposed change could lead to an increased number of shooting incidents and make it harder for authorities to distinguish between legal and illegal shooting activity, particularly during nighttime hours when visibility and identification are limited.

It is illegal to own a handgun in Ontario that was obtained after Oct. 21, 2022, due to the national freeze on handgun transfer effective that date. There is an Authorization to Carry (ATC) provision for highly specialized purposes. ATC does allow licensed trappers to legally own handguns, but we advise against this for the reasons given below.

We are cognizant that the current Premier does not support a ban on handguns, but the majority of Ontarians do<sup>2</sup>. Whether smuggled or stolen, handguns used illegally, or that cause a death, enter the populace as legally owned weapons. We need only to look south of the border to see how dangerous private ownership, minus a legitimate reason as defined by the ATC criteria, is. Handguns are easy to conceal, and that is why they are often favoured by criminals over long guns, which perfectly well serve the exact same purpose and, in the case of a .22 rifle, with a strap are easily carried.

### Compromising Animal Welfare

While the proposed regulation may be intended to ensure humane dispatch methods, the broadening of acceptable firearms could undermine the consistency and accuracy required for ethical, humane kills. A rifle or pistol used at night presents significant risks of wounding and consequent suffering of trapped animals. A handgun (pistol or

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<sup>2</sup> <https://www.theglobeandmail.com/politics/article-ontario-provincial-election-polls-2022/>

revolver) is less accurate than a rifle, the latter, with its longer barrel, better suited for the purpose of killing in conditions where it may be difficult for the trapper to get up close to the animal.

The nature of shooting in low-light conditions raises serious concerns about ensuring that animals are dispatched in the most humane manner possible. Additionally, the experience and skill level of individual trappers can vary, and this proposal does not account for whether all licensed trappers are adequately trained to safely and humanely use these firearms in potentially challenging conditions.

### Increased Difficulty in Enforcement and Compliance Monitoring

The broad allowance for any rim-fire caliber firearm, including pistols, after dark makes it more challenging for enforcement agencies to track and regulate compliance effectively. The complexity of managing a more diverse range of weapons, each with varying levels of effectiveness and appropriateness for humane dispatch, creates gaps in enforcement and oversight. If traps are checked and animals dispatched at night with firearms, it becomes significantly harder for authorities to ensure that all trapping and dispatching practices are carried out according to established humane standards.

Budgeting decisions by a succession of governments have undermined the ability of Conservation Officers (COs) to enforce existing legislation, and a very difficult but important job should not be made even harder (and, one might add, potentially more dangerous for the COs) as would be true if handguns and night shooting were allowed.

This regulation would, therefore, add significant challenges to wildlife management, especially when distinguishing between legal trapping activities and illegal poaching or hunting activities.

### Potential for Expansion Beyond Humane Trapping

As society becomes more educated on trapping and sustainable practices, expanding firearm use for the sake of convenience sends the wrong message about the values the public expects with managing wildlife resources.

The proposed changes to the regulation of dispatching furbearers after dark are a step backward for both public safety and humane wildlife management practices. The expansion of firearm use at night undermines the principles of ethical trapping and could result in harm to both animals and people.

**Proposal #4: Enable actions for protecting infrastructure on Crown land by trappers.**

- Beaver dam building activity, and the resulting alterations to surface water levels in streams, ponds, and lakes can cause hazards to both private property, and infrastructure on Crown land (e.g. forest access roads).
- The Fish and Wildlife Conservation Act, 1997 provides tools for people to address threats to private property when a beaver is damaging or about to damage a person's property.
- There are also mechanisms enabling a person to alter, damage or destroy a beaver dam located on Crown land if it is threatening their property.
- It is currently illegal to trap beaver on Crown land during the closed season (e.g., May – August), even where a beaver is threatening private property or critical infrastructure on Crown land.
- We are proposing changes that would enable licensed trappers to trap beaver on Crown land during the closed season in protection of property situations or to protect infrastructure. The ministry will develop beaver management guidance to support trappers in proactively addressing threats to property or infrastructure before it becomes an immediate issue.
- All existing requirements under the Agreement on International Humane Trapping Standards would apply.

While we recognize the challenges posed by beaver activity in certain areas, this proposal raises significant concerns related to ecological impact, animal welfare, regulatory overreach, and the erosion of seasonal protections critical to wildlife management in Ontario.

## Undermines Science-Based Wildlife Management and Closed Seasons

The current seasonal restrictions on beaver trapping are in place to protect beaver populations during critical periods such as breeding, rearing of young, and reduced mobility due to warmer weather. Allowing off-season trapping—even in cases involving infrastructure—effectively weakens the integrity of Ontario’s closed season regulations, setting a dangerous precedent for further erosion of science-based wildlife protections.

Removing seasonal protections under the broad and subjective justification of "threats to infrastructure" opens the door for overuse, misuse, or abuse of this exemption.

## Disrupts Ecosystems and Watershed Health

Beavers are keystone species whose activities play a vital role in shaping and maintaining healthy aquatic ecosystems. Their dams slow water flow, reduce erosion, increase biodiversity, and create wetland habitats essential for numerous species. Permitting the expanded trapping of beavers during their most vulnerable season risks upsetting these ecological balances, especially on Crown land, where biodiversity conservation should be prioritized over convenience.

In the off-season beaver pelts (like those of Canadian furbearers generally) are subprime and of little value to the fur industry. As the industry itself has said<sup>3</sup>:

*...The beaver market, made fairly hot due to the hat market, has softened up and prices are dropping slowly. At this past sale, Eastern beaver pelts averaged \$24.91, compared to \$32.57 in March 2024, whereas western beaver pelts averaged \$19.49, compared to \$28.87 in March 2024. My advice on beaver remains the same, catch them when they are prime. There is no indication that the beaver market will move up for the coming year either, as the demand for the hatter market has been met and many pelts still wait to be transformed into hats.*

This makes the castoreum essentially the only economically motivated reason to kill a beaver outside of winter when pelts are prime.

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<sup>3</sup> <http://www.trappermag.com/article-index/summer-2025-fur-market-report-fur-harvesters-auction-results>

Short-term protection of roads and culverts must not come at the expense of long-term ecosystem health and water management stability. Indeed there are numerous non-lethal methods to protect infrastructure, like culvert protectors (exclusionary fencing), 'beaver deceivers' (protected flow device) and pond levelers (flexible tubing).

These devices work well, are economical over the long run, and with easy upkeep prevent problems from beavers from recurring. Removal of beaver by whatever means, including killing, results in reduced competition among survivors with the result that the more beavers can move in.

### Lack of Oversight and Risk of Overreach

The proposed policy lacks clarity on *how* and *when* a threat qualifies as justification for off-season trapping, and *who* will determine or verify that trapping is warranted. In practice, this could allow individuals or companies to overstate the urgency of a situation in order to bypass seasonal regulations, especially in forestry or development contexts. The proposed legislation clearly facilitates corruption.

Without a strong, transparent, and enforceable framework, this change risks increasing routine off-season trapping across vast areas of Crown land, undermining conservation efforts, forest fire mitigation and enforcement capacity.

### Animal Welfare Concerns During Vulnerable Life Stages

Beavers raise their young during spring and early summer. Off-season trapping during these months could result in orphaned kits, prolonged suffering, or unnecessary mortality. While the proposal suggests that trappers would proactively prevent damage, this conflicts with the reality of beaver life cycles, where family units are closely tied and removing adult beavers in summer is likely to result in cruel outcomes.

Beavers are sexually mature before their second birth date and then can form life-long pair bonds, and will produce one litter per year of 3 to 4 young. If the mother is killed during the first two weeks of a beaver pup's birth, the entire family is lost for that year.

The beaver is a social animal, and while there is obviously significant “natural” mortality from predators and other causes, the cruelty inherent in young beavers either starving, or failing to benefit from the social interactions with both parents during the earliest stages of their lives is an obvious concern.

Any effort to address infrastructure threats must also respect the ethical treatment of wildlife and avoid interventions that cause undue harm to animals during sensitive life stages.

### Non-Lethal Alternatives are Available and Underutilized

Instead of weakening wildlife protections, the Ministry has an opportunity to become the leader in non-lethal beaver management techniques—such as flow devices, culvert protectors, and pond levelers—that allow for the coexistence of beaver populations and infrastructure. These proven and increasingly popular tools reduce flooding and dam-related damage without eliminating beavers or disturbing breeding populations.

Expanding lethal trapping should be a last resort—not a proactive measure.

Protecting infrastructure is important, but it must be balanced against the long-term ecological role of beavers, the need for science-based regulation, and public expectations for ethical wildlife stewardship. Rather than expanding off-season trapping, we encourage a stronger commitment to habitat planning, ecological mitigation, and non-lethal conflict solutions that align with modern conservation values.

### Additive Mortality versus Compensatory Mortality

What these proposals fail to consider is the risk of moving from compensatory to additive mortality that would inevitably occur in response to the proposed changes in current trapping legislation. In theory, managed wildlife consumption, such as fur trapping, is controlled through licensing and careful annual monitoring to keep the

“offtake”, the removal of individual animals, within the range of compensatory mortality. Put simply, this means that the number removed is *less* than the number of surviving animals needed to replenish the population and bring it up to where it previously was.

Additive mortality is the loss of individual animals *above* that number and so results in more animals being removed than what is required to achieve replacement, with the result that the overall size of the population declines. The concern is with the proposal to so reduce oversight of the numbers taken, in conjunction with incentivizing trappers to kill more beavers, in at least some regions the offtake is likely to be additive, leading to declines that the Ministry will lack the ability to recognize until local endangerment, possibly extirpation, occurs.

Addendum:

Many fashion houses no longer use fur, including Prada, Chanel, Gucci, Versace, Armani, Michael Kors, Burberry, DKNY, Ralph Lauren, Calvin Klein, Tommy Hilfiger, Hugo Boss, and Yves Saint Laurent. Stella McCartney has always been a pioneer in fur-free design, launching in 2001 without ever using fur.

Additionally, many countries no longer allow the operation of fur farms, including Austria (banned fur farming in 2005), Belgium (banned fur farming in 2023), Norway (banned fur farming in February 2025), Estonia (banned fur farming with an effective date in 2025), Slovakia (banned fur farming with an effective date in 2025), Ireland (banned fur farming with legislation in 2022), Italy (banned fur farming in 2022), and France (banned fur farming in 2020/2021). Most recently in mid-September, Switzerland positioned itself to tighten regulations regarding fur<sup>4</sup>.

As the perfume industry itself has said regarding castoreum, “Not surprisingly, this carnal, animalic note has since the beginning of the 20th Century – for ethical and environmental reasons – almost always been recreated synthetically: it’s really not on to kill an animal to extract a scented oil.”<sup>5</sup>

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<sup>4</sup> <https://www.furfreealliance.com/switzerland-rejects-fur-lobby-influence/>

<sup>5</sup> <https://perfumesociety.org/ingredients-post/castoreum/>