

PROJECT COYOTE

F O S T E R I N G C O E X I S T E N C E



February 1, 2022

Natural Resources Subcommittee
House Agriculture, Chesapeake and Natural Resources
House Room 3, Capitol Building
1000 Bank Street,
Richmond, VA, 23218

Via House [SPEAK](#) site

Att'n: James E. Edmunds, II (Chair), DelJEdmunds@house.virginia.gov
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Re: Statement in Support of HB725, HB1175 and HB1175

Dear Chair Edmunds and Board Members:

On behalf of Project Coyote Science's almost 1,000 Virginia supporters, Advisory Board members and the undersigned, we express our support for HB725, HB1175 and HB1175 to ban steel jaw traps and snares in Virginia. We support the prohibition of lethal trapping of wildlife for the purposes of recreation, commerce and nuisance/damage control. The signatories are scientists and ethicists who have looked at both types of evidence and arguments. We oppose trapping for those purposes, based on the following three premises:

-- No method of killing an animal by trapping for recreation, commerce, or nuisance/damage control can avoid inflicting some level of pain and suffering, even if brief, before death.

-- No method of killing an animal by trapping for recreation, commerce, or nuisance/damage control can avoid the potential of capturing, with the risk of injuring or killing, non-target animals.

-- No method of killing animals by trapping for recreation, commerce, or nuisance/damage control can be supported by credible scientific data or evidence as serving a legitimate wildlife management or conservation objective that cannot be accomplished with more humane alternatives.

Our responsibility to mitigate the prolonged pain and suffering of target animals and decrease the risk of anthropogenic deaths to non-target animals (i.e., the claims of these nonhuman animals to life and well-being) trumps human claims to trapping for recreation, commerce, and nuisance/damage control. Because trapping with lethal intent using devices such as leghold and Conibear body-gripping traps and snares is inherently indiscriminate and can result in prolonged pain and suffering before death, we conclude that lethal trapping for recreation, commerce, and nuisance/damage control is not justified. Trapped animals can experience extreme stress, dehydration, hunger, panic-induced self-mutilation, exposure to weather, permanent physical damage (particularly loss of limbs), and predation—all of which constitute more than fleeting pain and suffering before death.

The high probability of indiscriminate trapping by unsupervised sport, commercial, and nuisance trappers combines with inadequate regulation and enforcement to generate unacceptable risks to companion animals, imperiled wildlife, and other non-target animals. Because of competing financial and non-financial interests in the animal-trapping community, we warn against policies for self-policing and voluntary enforcement of regulations protecting non-target animals. Authorized trapping of coyotes, foxes, bobcats and other species can threaten the recovery of imperiled species such as gray wolves and Canada lynx.

We are also opposed to lethal trapping when the objective is to control populations of mammalian predators. There is no credible evidence that trapping effectively manages populations of predators or their prey species. Most traps—and specifically their settings, lures or attractants—attract multiple non-target species, and therefore unsupervised trapping that is characteristic of recreational, commercial, and control trapping has the potential to indiscriminately catch, maim, and kill non-target animals including domestic dogs, imperiled species, and animals of the unintended sex, age class, or species. Science demonstrates that unexploited wolf and coyote populations self-regulate through dominant individuals defending territories and suppressing successful breeding in subordinate pack members. Killing an adult male cougar opens his territory to younger males and invites increased predation on native ungulates and livestock as a result. Additionally, a large body of science indicates that killing predators at the exploitation levels achieved by trapping does not reliably increase ungulate abundance. Factors such as habitat and climate are much stronger determinants of ungulate abundance.

The principles of wildlife management, and any sound evidence-based policy, require that the best-available science be paramount in determining whether the stated objectives of a management strategy achieve the desired outcomes. Because lethal trapping for recreation, commerce, nuisance, and population control is indiscriminate and ineffective at meeting wildlife management or conservation objectives, and cannot avoid unnecessary pain before death, such

trapping should be prohibited. Instead, we recommend identifying and following principles for ethical management of human-wildlife interactions. We accept humanely managed and properly permitted scientific trapping when such programs are vetted and approved by institutional animal care and use committees.

Respectfully submitted,



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