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January 22, 2016

Chair and Members,  
Licensing and Standards Committee

Re: LS9.3 Licensing of Wildlife Control Operators

Dear Chair and Members of Licensing and Standards Committee,

On behalf of the Ontario Fur Managers Federation, we would like to thank you for allowing us the opportunity to speak to you regarding the Licensing of Wildlife Control Operators. OFMF understands that the committee strives to ensure public safety and public health to protect consumers from fraudulent and/or untrained operators. However, some of the items proposed will have an adverse effect to the committee's intent and go against not only Provincial legislation, but international legislation also.

The OFMF recommends to the committee that Trappers licensed by the Province of Ontario and Licensed Pest Control agents be EXCLUDED from the requirements that are listed in the motion that is proposed. Both of these occupations have obtained an extensive course and examination before being licensed. Both of these licenses give these licensed individuals the right to remove, trap, capture, handle, transport, relocate or humanely dispatch wildlife. As agents of the Crown, trappers are governed by provincial legislation and regulations regarding wildlife as well as the Pesticide Act which would supersede the Municipal Act.

The OFMF wants the committee members to understand that under the Agreement of Humane trapping standards, any legal competent authority in Canada is bound by this tri-party agreement with Russia and the European Union in regards to trapping, nuisance wildlife control, for food, etc. This includes

municipalities including Toronto as the legal competent authority allowing only humane trapping devices that have met the stringent standard listed in the AIHTS and certified in the provincial jurisdiction. This includes not only restraining traps and body gripping traps, but also live cage and box traps. Included with this submission is the certified traps list for Canada and approved for Ontario. The city of Toronto cannot regulate traps or devices that go against this international agreement. In the motion under the course outline 2.f. it is proposed that the heated baby reunion boxes be utilized. These are a live holding device that has not been tested and certified under the standards of the AIHTS agreement. Also 2.g. goes outside of the AIHTS agreement and certification as cage and box traps are certified for use to capture wildlife whether they are set outdoors or inside a building structure.

The OFMF would also like to address 2.g. for wildlife control and nuisance issues for wildlife outside of building structures. It is proposed that no cage or box traps can be set outside of building structures and no restraining or body gripping traps can be used, period. How does the committee propose to catch a beaver in a municipal drain or a nuisance or diseased raccoon in an alley or a resident's yard? A coyote trapped in a fenced in area, residential property, or municipal property being aggressive to people? This specific item in the proposal goes against the intent of ensuring public safety, public health and environmental protections.

The OFMF would like to bring to the attention of the committee that raccoon rabies has appeared in Ontario after being nonexistent for over a decade. There now are 15 confirmed cases of raccoon rabies in the city of Hamilton at this point. Provincial Agencies are very concerned and have implemented baiting in a 25 km radius of the confirmed case. They are also asking trappers involved with the surveillance with this outbreak to provide raccoons for sampling to monitor the movement and severity of the outbreak. OFMF had addressed rabies and round worm in our presentation to this committee on May 24, 2014. If you recall the public health staff member was asked about these diseases by one of your committee members. The response was they are not a concern as these diseases are almost nonexistent. We are not trying to cause fear mongering or public panic; however we want the committee to recognize that unfortunately raccoon rabies is a reality in Ontario. This committee needs to carefully consider how they proceed with this motion and make sure that professionals are not excluded from properly dealing with wildlife control and having the legal, certified humane methods at their disposal!

The OFMF makes the following recommendations for the committee:

- The OFMF recommends to the committee if they go ahead with this motion and recommendation that it only should apply to Wildlife Control agents that are not licensed trappers or licensed Pest Control agents. Provincially licensed trappers and Pest Control agents be excluded from this process.
- The OFMF recommends the humane standards, trapping devices and live holding devices that are to be used for Wildlife Control in Toronto are the most current Certified Traps as listed by the Fur Institute of Canada for AIHTS implementation in Canada.
- That the trapping devices listed above be able to be utilized outside or inside of building structures and not limited to use as proposed in 2.g. of the proposed training.

In closing the OFMF would again offer the committee and staff that we are more than willing to work with and participate to help develop wildlife control objectives that are legal and comply with government legislation and agreements.

Sincerely on behalf of OFMF,

A handwritten signature in cursive script that reads "Robin Horwath".

Robin Horwath  
General Manager