

Environment and Climate Change Canada
Sustainability Directorate
351 St-Joseph Blvd., 4th Floor
Gatineau, Quebec K1A 0H3

March 25, 2026

Re: Draft 2026–2029 Federal Sustainable Development Strategy

Sent via email: SDO-BDD@ec.gc.ca

To the Sustainability Directorate,

Thank you for the opportunity to comment on the draft 2026–2029 Federal Sustainable Development Strategy (FSDS). My name is Maggie Spizzirri, and I am the Executive Director of the [Exposed Wildlife Conservancy](#), a registered Canadian charity dedicated to advancing science-based wildlife stewardship, coexistence, and evidence-based conservation advocacy.

Exposed Wildlife Conservancy supports the draft Strategy's emphasis on protecting and restoring ecosystems and biodiversity. In particular, Goal 3.3 in recognizing that biodiversity loss affects species at risk, ecological integrity, and protected and conserved areas, including national parks.

For clarity, the comments below relate to commercial and recreational trapping practices and standards, and not to Indigenous harvesting carried out pursuant to Indigenous rights, agreements, or traditional harvesting arrangements. This distinction is important and should not be conflated in federal policy discussions.

We submit that the final FSDS would be strengthened further by considering the biodiversity implications of **non-selective trapping practices**, particularly where they affect non-target wildlife, species at risk, and ecological integrity in areas of federal responsibility.

A 2025 peer-reviewed review by [Gilbert Proulx](#) concludes that killing neck snares are inhumane and non-selective and documents that they capture a wide range of non-target wild and domestic animals. The paper also states that such non-selectivity can contribute to the loss of species at risk, including wolverine and woodland caribou, and cites evidence that killing neck snares set on traplines adjacent to **Banff and Jasper National Parks remove 8–12%** of the resident mountain lion population each year.

This concern is consistent with federal species-at-risk documents already in force. The federal [Recovery Strategy for the Wolverine](#) (Eastern population) identifies incidental take, opportunistic harvesting, and capture for the fur trade among the threats that can have profound effects on the species' survival. It also states that the long-term objective should include minimizing interactions with trapping activities for other species. The same recovery strategy notes that leg-hold traps and snares meant for Beavers or Canada Lynx can also pose a threat to the Wolverine, and that the wolverine's scavenging behaviour increases their vulnerability to trapping.

The federal [Management Plan for the Eastern Wolf](#) is similarly relevant. It identifies hunting, trapping and poaching as a threat, states that Eastern Wolves are or have been hunted or trapped for both commercial and recreational purposes, and notes that in one southern Quebec survey, **97% of the reported harvest of wolves came from trapping**. The plan also states that the annual survival of Eastern Wolves is much higher in areas where hunting and trapping have been reduced or banned outright than in areas where they are permitted, stating that hunting and trapping are prohibited in certain protected areas, including La Mauricie National Park. Appendix A further reports that in and around **La Mauricie National Park, 90% of documented wolf mortalities** between 2000 and 2003 were caused by trapping.

These federal recovery and management documents are directly relevant to the draft FSDS as Goal 3.3 links biodiversity protection to species-at-risk recovery and ecological integrity. They also suggest that certain trapping practices can undermine those objectives, including in or around protected areas.

The scientific literature also raises concerns about Canada's continued reliance on the Agreement on International Humane Trapping Standards (AIHTS). Proulx notes that the AIHTS has been subject to recurring scientific criticism and argues that its implementation in Canada has allowed killing neck snares to persist through interim permissions lasting more than two decades. Canada's own summary of the [AIHTS](#) states that the agreement is intended to improve animal welfare in the trapping of wildlife, meet European Union humane trapping requirements, and thereby maintain access to the European wild fur market.

Taken together, these materials suggest a potential gap between the biodiversity, species-at-risk, and ecological-integrity objectives set out in the draft FSDS and the wildlife impacts associated with certain non-selective trapping practices and the standards currently relied upon at the federal level. As written, the draft Strategy does not appear to explicitly address this issue, despite its relevance to wildlife protection, species recovery, and the management of protected and conserved areas.

We respectfully encourage the federal government to consider whether the final FSDS should more clearly acknowledge the biodiversity implications of non-selective trapping practices and whether Canada's continued reliance on the AIHTS remains aligned with current federal commitments related to biodiversity protection, species-at-risk recovery, and ecological integrity.

Thank you for your consideration. Please do not hesitate to contact me if you have any questions or would like to discuss these comments further.

Sincerely,



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