

**Written Submission for the Pre-Budget
Consultations in Advance of the Upcoming
Federal Budget**

By: Exposed Wildlife Conservancy

- **Recommendation 1:** That the Government of Canada provide dedicated funding to review whether Canada's continued reliance on the Agreement on International Humane Trapping Standards (AIHTS) and its implementation remain aligned with current federal commitments related to biodiversity protection, species-at-risk recovery, ecological integrity, and humane wildlife management.

The Exposed Wildlife Conservancy is submitting this recommendation because Canada continues to rely on the AIHTS as part of its federal wildlife framework, yet there is credible evidence that current trapping standards and their implementation warrant renewed federal scrutiny. Canada's own summary of the [AIHTS](#)¹ states that the agreement is intended to improve animal welfare in the trapping of wildlife, meet European Union humane trapping requirements, and maintain access to the European wild fur market. The same federal source states that the Government of Canada provides funding to the Fur Institute of Canada for trap research and testing to ensure traps used in Canada can be certified in compliance with the AIHTS.

This review is especially important in relation to killing neck snares. Recent peer-reviewed scientific literature has raised serious concerns about their humaneness and non-selectivity. In a 2025 review, [Gilbert Proulx](#)² concluded that killing neck snares are inhumane and non-selective, documented non-target capture of wild and domestic animals, and argued that gaps in the implementation of the AIHTS in Canada have allowed problematic devices to persist.

At the same time, Canada's current AIHTS implementation materials issued through the [Fur Institute of Canada](#)³ continue to identify "approved design" killing neck snares within the Canadian implementation framework. This matters because the AIHTS itself provides that the parties shall "re-evaluate and update Annex I", the first time three years after the entry into force of the Agreement. [EU materials](#)⁴ explaining the agreement also state that trapping methods designed to kill were to be tested within five years after entry into force, and that the use of uncertified traps must then be prohibited within three years after the end of those periods.

In practice, however, Canada's implementation framework still accommodates killing neck snares. A federally funded review is therefore warranted to determine whether Canada's continued reliance on the AIHTS and its implementation remains aligned with current biodiversity, species-at-risk, and humane wildlife management commitments.

Federal species documents also demonstrate that trapping-related impacts are relevant to biodiversity and species recovery. The federal [Recovery Strategy for the Wolverine](#)⁵ (Eastern population) identifies incidental take, opportunistic harvesting, and capture for the fur trade among threats with potentially profound effects on survival and recovery, and notes that traps and snares set for other species can also pose a threat to wolverines. The federal [Management Plan for the Eastern Wolf](#)⁶ identifies hunting, trapping, and poaching as threats, notes that trapping can be a significant source of mortality, and reports that in and around La Mauricie National Park, 90% of documented wolf mortalities between 2000 and 2003 were caused by trapping.

These issues are directly relevant to the federal government's biodiversity and species-at-risk

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<https://www.canada.ca/en/environment-climate-change/corporate/international-affairs/partnerships-organizations/humane-trapping-standards.html>

2 <https://pubmed.ncbi.nlm.nih.gov/40805010/>

3 https://fur.ca/wp-content/uploads/2026/03/M1105_CertifiedTrapsList_FIC_EN_MARS-2026-EPF.pdf

4 <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX%3A51997PC0251>

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<https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/recovery-strategies/wolverine-eastern-2016.html>

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<https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/management-plans/eastern-wolf-2020.html>

responsibilities. A funded federal review would allow Canada to assess whether its continued reliance on the AIHTS remains aligned with current federal commitments related to biodiversity protection, ecological integrity, humane wildlife management, and species recovery. It would also provide a clearer evidence base for future policy decisions.

For clarity, this recommendation relates to commercial and recreational trapping standards and their federal policy implications. It does not address Indigenous harvesting carried out pursuant to Indigenous rights, agreements, or traditional harvesting arrangements.

We respectfully urge the Government of Canada to fund this review as part of the upcoming federal budget process.

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[Exposed Wildlife Conservancy](https://www.exposedwildlifeconservancy.org/)⁷ is a Canadian charitable organization that advances science-based, ethical, and solutions-focused wildlife policy. Our work focuses on wildlife stewardship, coexistence, and public policy, with a particular emphasis on apex predators, biodiversity, and humane wildlife management.

⁷ <https://www.exposedwildlifeconservancy.org/>