

We are writing on behalf of the Colorado Chapter and the Hunting, Trapping, and Conservation Working Group of The Wildlife Society, a scientific organization founded in 1936 which represents more than 11,000 wildlife professionals. Our organization has concerns about the petition to ban the sale, trade, or barter of furs the Colorado Parks and Wildlife Commission recently moved forward. The Wildlife Society believes in science-based policy and the integrity of trained biologists. As such, we support the initial recommendation from Colorado Parks and Wildlife, which was to not move the petition forward.

The Wildlife Society also believes in leadership through education. As such, we would like to address several points raised in the petition that misinterpret the North American Model of Wildlife Management (NAM) and are not supported by the best available science that may result in negative outcomes for Colorado furbearers, other wildlife, and Colorado residents.

One of the elements of the NAM that the petition cites as justification for prohibiting the sale of fur is the elimination of markets for game. However, it is widely understood that this tenant of the NAM is specific to unregulated markets, which were present in the late 19<sup>th</sup> and early 20<sup>th</sup> centuries. Even during that period, markets for wild caught furbearer pelts were understood to be a necessary method to derive the most use from animals that were killed for livestock predation, property damage, and other conflicts with human land uses. In present day Colorado, 63% of trapping occurs on private lands, with half of the trappers in the state being contacted by landowners for wildlife removal.

Since the early 20<sup>th</sup> century, the wildlife profession has recognized that markets for fur are sustainable and that regulated trapping and hunting pose no risk to most furbearer populations. Unlike big and small game species that are often harvested primarily for human consumption, some furbearers, such as canids, are not commonly consumed, yet their populations are often managed on human-dominated landscapes and can sustain regulated harvests. Thus, wild fur is a renewable natural resource that is highly valued by many members of society, with 89% of Colorado trappers using and taking the pelts of the furbearers they harvested.

The Wildlife Society has position statements on both Hunting and Trapping. The latter recognizes that trapping is a “...safe, efficient, and practical means of capturing individual animals without impairing the survival of furbearer populations...”. Likewise, the Hunting statement endorses the principle that hunting “...when properly regulated, is an appropriate and responsible use of wildlife and a means of managing wildlife populations.”

The petition also alleges that the indiscriminate nature of traps leads to harm for non-target species. This ignores the body of research on trap design testing conducted through the Best Management Practices (BMP) program<sup>1</sup>, an international effort to test capture

device designs and evaluate them based on five criteria: animal welfare, trap selectivity, trap efficiency, trap safety, and practicality. Use of BMP-approved traps, which a majority of trappers use<sup>2</sup> and includes cage traps, significantly reduces non-target capture and if a non-target species is captured the high animal welfare standard of BMP-approved traps results in most terrestrial animals being able to be released without injury.

The petition mentions Canada lynx as being at risk from traps set for other species but cites no examples of this happening, nor does it cite any taken mistakenly by hunters. In Colorado, only cage-style traps are legal for most furbearers on public lands. Cage traps had the lowest injury score of any trap type in BMP testing, as determined by independent veterinary pathologists. They are also commonly used around homes, including for feral cat trap, neuter, and release programs, evidence that they are supported by the public and considered humane.

The petition also cites a risk of furbearer overharvest caused by a lack of comprehensive, up-to-date population data for many species as a justification for the proposed ban. However, that sets a relatively unattainable bar for any harvest of wildlife and ignores the record of sustainable management of hunted and trapped species conducted by Colorado Parks and Wildlife. State fish and wildlife agencies employ many methods to understand how harvest levels affect wildlife species and to understand population dynamics of all species. Some of these involve intensive field research to obtain estimates of abundance and key population parameters such as reproduction and survival rates, but these are uncommon and expensive. Research and surveys are more common, involving monitoring trends in harvests, sex ratios, female:offspring ratios, sighting rates, and various types of sign surveys to understand whether populations are increasing or decreasing. Other methods, such as examining carcasses and reproductive tracts of roadkilled animals or those taken in response to wildlife-human conflicts can be used to provide information on species where harvest is low or non-existent.

Indeed, most wildlife agencies use multiple sources of information, along with the knowledge their professional and trained staff possess of species biology, to understand population levels and trends of both common and uncommon species. For common species with high reproductive rates, such as coyotes or raccoons, wildlife managers have a base of knowledge that allows them to permit harvests without comprehensive population data. Further, states such as Colorado have monitoring systems in place that allow for adapting season and bag limit recommendations if declines are detected. Indeed, it would be a waste of scarce conservation funds to perform rigorous population assessments of such common species at the expense of other research or conservation actions.

The public supports regulated trapping and hunting<sup>3,4</sup>. The public also believes that if an animal is harvested, it should be used. Over two thirds of trapping is intended to resolve

human wildlife conflict. These animals aren't harvested for fur, but trappers often sell fur from these animals. As such, banning the sale of fur won't result in a significant decrease in trapping, but instead a waste of those animals that are harvested. That reality is counter to public desires and expectations around regulated harvest and would be a waste of public trust resources.

Overall, the Colorado Chapter and the Hunting, Trapping, and Conservation Working Group and the wildlife professionals we represent are concerned by the petition because its claims are not based on science and will likely lead to outcomes with negative consequences for both the wildlife resources and citizens of Colorado.

Respectfully submitted,

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<sup>1</sup> [https://www.fishwildlife.org/application/files/9016/5479/0289/Introduction\\_2022.pdf](https://www.fishwildlife.org/application/files/9016/5479/0289/Introduction_2022.pdf)

<sup>2</sup> [https://furbearermanagement.com/wp-content/uploads/2025/02/National-Trapper-Survey-Report\\_AFWA\\_2024.pdf](https://furbearermanagement.com/wp-content/uploads/2025/02/National-Trapper-Survey-Report_AFWA_2024.pdf)

<sup>3</sup> <https://cahss.org/our-research/americans-attitudes-toward-hunting-and-sport-shooting-2025-report>

<sup>4</sup> [https://www.fishwildlife.org/application/files/1515/2123/4734/Trapping-Public-Attitudes-FINAL-03-07-18\\_reduced.pdf](https://www.fishwildlife.org/application/files/1515/2123/4734/Trapping-Public-Attitudes-FINAL-03-07-18_reduced.pdf)

