Dear Committee Members,
As a member of the public who has sought to engage in the public process at every opportunity as it relates to current proposed trapping changes, I wanted to provide a final comment on portions of the Vermont Fish & Wildlife Department's recommended changes before LCAR that were not part of the public comment process.

Section 4.16 of the proposed rules contains language and content that was not available to the public for comment before the June 2023 deadline and was added only in the November 1, 2023 proposed rules provided to LCAR. The section currently reads as follows:

4.16 Dispatch of Trapped Animals: Upon discovery, a trapper shall immediately dispatch a live trapped furbearer with a muzzleloader or gun fired at arm's length; or a bow and arrow, or crossbow ***or a carbon dioxide chamber in compliance with the American Veterinary Medical Association guidelines.*** *This subsection shall not be interpreted to prevent a trapper from releasing an unharmed captured animal, or a domestic pet.*

This one proposed change would contradict the legislative intent of Act 159 by authorizing a method of dispatch that has not been proven to be a humane form of euthanasia for most wildlife. AVMA guidelines are intended for veterinary professionals, not licensed trappers. The use of carbon dioxide gas chambers is a method currently in use by nuisance trappers and fur farmers in other states to kill raccoons and mink. While commercially produced gas chambers are available to euthanize small rodents commonly used in laboratory experiments or to feed reptiles, no such device has been approved for euthanizing wildlife.

Online resources available to trappers provide instructions on how to turn regular objects such as a trash can into a carbon dioxide gas chamber to kill trapped wildlife, despite any approval of such a device by the AVMA. Transporting live animals from a trap site to a location where they can be killed en masse by a licensed trapper hardly reduces the level of suffering experienced by animals in Vermont traps. The Vermont Fish & Wildlife Department has provided zero information on this proposed dispatch method and thus it should not be approved as a humane method to dispatch wildlife.

I greatly appreciate the Committee's commitment to honoring the legislative intent of not only Act 159 and 165, but all laws enacted by the Legislature and thank LCAR members for their due diligence.

Sincerely,

Rod Coronado, Vermont Wildlife Patrol

AVMA Guidelines on the Euthanasia of Animals:

"The AVMA guidelines for the euthanasia of animals are intended for use by members of the veterinary profession who carry out or oversee the euthanasia of animals."

https://www.avma.org/resources-tools/avma-policies/avma-guidelines-euthanasia-animals

AVMA Guidelines for the Euthanasia of Animals 2020 Edition:

"Carbon dioxide has the potential to cause distress in animals via 3 different mechanisms: (1) pain due to formation of carbonic acid on respiratory and ocular membranes, (2) production of so-called air hunger and a feeling of breathlessness, and (3) direct stimulation of ion channels within the amygdala associated with the fear response. Substantial species and strain differences are reported."

https://www.avma.org/sites/default/files/2020-02/Guidelines-on-Euthanasia-2020.pdf

National Institute of Health Guidelines for Euthanasia of Rodents Using Carbon Dioxide:

Although CO_2 is generally considered an acceptable euthanasia agent for small animals when properly administered, its acceptability is predicated on a number of critical factors as described in the AVMA Guidelines for Euthanasia of Animals…Animals must be euthanized by trained personnel using appropriate technique, equipment, and agents."

https://oacu.oir.nih.gov/system/files/media/file/2021-06/b5_euthanasia_of_rodents_using_carbon_dioxide.pdf

Best Practices for Nuisance Control Wildlife Operators:

"Carbon dioxide chambers work well to humanely kill birds, rodents, and most small mammals. But you may encounter problems if you try this technique on animals that are old, very young (less than 2 weeks old), weak, or sick with a respiratory disease, because they're often resistant to the effects of carbon dioxide."

http://ny.nwctp.org/best-practices-for-wildlife-damage-management/tools-and-techniques/