

June 6, 2018

South Dakota Game, Fish, and Parks Commission
Foss Building
523 East Capitol Avenue
Pierre, SD 57501

Re: Letter of Support on Trapping Proposal Amendments to Chapter 41:08:02

Dear South Dakota Game, Fish, and Parks Commissioners,

Thank you for the opportunity to submit this letter of support for trapping proposal amendments to Chapter 41:08:02. My name is Julie Kluck, and I am a Campaign Associate at Born Free USA, a non-profit organization that seeks to end the suffering of wild animals in captivity, rescue individual animals in need, and protect wildlife in their natural habitats – by keeping wildlife in the wild and encouraging compassionate conservation globally. Born Free is an industry leader in the anti-trapping movement, having devoted years to investigating the trapping industry. Among other work, we have produced investigative reports on trapping throughout the United States and reports that analyze trapping legislation for each individual state, and have been tracking trapping incidents throughout the United States for more than forty years.

On behalf of Born Free and its South Dakota supporters, we would like to support the proposed amendments to Chapter 41:08:02. These amendments are: to extend the existing prohibition on the use of snares, to require all traps and snares placed on public lands and improved road rights-of-way to be marked with the owner's name and address or personal identification number, and to prohibit spring or other powered snares that hold the snare closed.¹ Born Free previously conducted an investigation into the trapping industry, and uncovered the shocking and brutal animal cruelty involved with these traps. To witness the brutality firsthand, please visit Born Free's *Victims of Vanity: The Investigation* webpage (http://www.bornfreeusa.org/a10a1_investigation.php), and *Victims of Vanity II: Our Findings* webpage (http://www.bornfreeusa.org/a10a1_investigation2016.php).

As mentioned earlier, Born Free has produced reports analyzing the trapping legislation for each individual state. Accompanying the report is a report card, which gives each state a letter grade based on key trapping regulations, such as regulations that have the greatest impact on animal welfare, wildlife conservation, and are of greatest concern to the public. In Born Free's most recent report (Fall 2017), the state of South Dakota received a failing grade of an "F."²

¹ "Game, Fish, and Parks Commission Action Proposal. Trapping Prohibitions. Chapter 41:08:02." *Game, Fish, and Parks Commission*, https://gfp.sd.gov/UserDocs/nav/may2018_proposals.pdf. Accessed June 5 2018.

² "2017 Trapping Report: The Report Card." *Born Free USA*, http://www.bornfreeusa.org/a10_trapping-reportcard.php. Accessed June 5 2018.

The trapping report assigns grades on four different criteria; relevant here are the categories entitled "Trap Types and Kill Method" and "Trapper Requirements." South Dakota received a score of 30 out of 100 for Trap Types and Kill Method and 32 out of 100 for Trapper Requirements, both of which are a failing grade. However, if the proposed amendments were passed, thereby restricting the use of snares, prohibiting spring or other powered snares, and requiring trapper identification on traps, the points awarded would increase, granting South Dakota an even better grade – reflective of increased safety and promoting humanity.

Relatedly, the proposed legislation will undoubtedly decrease trapping of non-targeted species. As part of Born Free's work, it has compiled a database of reports of non-targeted species (dogs, cats, endangered species, and even humans) that were trapped over the past 40 years.³ After analyzing the data, we learned that the traps at issue are not only barbaric, but indiscriminate.⁴

Due to Born Free's extensive knowledge of wildlife trapping and the consequences that it can create, we respectfully request that the South Dakota Game, Fish, and Parks Commission work to strengthen South Dakota's trapping laws; we must work to create a more humane and sustainable environment that will better serve both the state and its public. Accordingly, we recommend that the Game, Fish, and Parks Commissioners pass the proposed amendments to Chapter 41:08:02.

Thank you for your consideration of this matter.

Sincerely,



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Born Free USA

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³ "Non-targeted Trapping Incidents." *Born Free USA*, http://www.bornfreeusa.org/database/trapping_incidents.php?state%5B%5D=&speciescode=&x=18&y=13. Accessed June 5 2018.

⁴ Here is a report of one such incident in Spearfish, South Dakota: in the Game Production Area, a dog named Booper died when he ran into a wire snare. Unfortunately, for many trapped animals – both targeted and non-targeted species – most do not survive.