



November 5, 2019

Ronald S. Amidon, Commissioner
Massachusetts Division of Fisheries and Wildlife
1 Rabbit Hill Road
Westborough, MA 01581

Joseph S. Larson, Ph.D., Chairman
Michael P. Roche, Vice Chair
Fisheries and Wildlife Board
1 Rabbit Hill Road
Westborough, MA 01581

RE: Testimony in Support of (1) a Prohibition on Contests for the Capture, Take or Waste of Predator and Furbearer Animals; (2) a Prohibition on the Waste of Certain Game Animals and Birds; and (3) an Amendment of Existing Regulations to Modify the Harvest Reporting Requirements for Fox and Coyote

Dear Commissioner Amidon, Chairman Larson, Vice Chairman Roche, and Members of the Fisheries and Wildlife Board,

The undersigned organizations commend MassWildlife for proposing forward-thinking, scientifically-sound regulations relating to killing contests and wanton waste, and urge Commissioner Amidon and the Fisheries and Wildlife Board to approve these regulations. We would also like to express our sincere appreciation for MassWildlife's comprehensive and informative presentation at the outset of the listening sessions and the public hearings.

As Massachusetts citizens have indicated, they overwhelmingly feel that wildlife killing contests are senseless and wasteful events, and have no place in a state that maintains an expectation of ethical practices among its hunting and fishing community. Such contests violate fundamental principles of the North American Model of Wildlife Conservation, undermining public support for hunting and damaging the reputation of all sportsmen and sportswomen.

A gentleman from the Department of Fish and Game's Office of Fishing and Boating Access expressed at the close of the October 29 public hearing that he asks himself if he wants to be known as a *hunter*, or as a *contestant*. And as several citizens have stated at listening sessions and hearings, they do not oppose hunting, but they do oppose contests and wastefulness. Simply put, it is clear that the majority of Massachusetts residents share the North American Model of Wildlife Conservation's principles—one should not kill a wild animal if they do not plan to make every effort to fully utilize that animal. Taking the life of another being is a profound act, and, as the public has demonstrated, it will not tolerate such taking done merely in pursuit of a prize or for "fun."

Wildlife agency professionals across the country have also expressed concerns about killing contests. Hunter and chairman of the Oregon Fish and Wildlife Commission Mike Finley recently called such contests “slaughter fests” and “stomach-turning examples of wanton waste.”¹ Former president of the California Fish and Game Commission and waterfowl hunter Mike Sutton denounced them as “unethical” and “an anachronism [with] no place in modern wildlife management.”² Vermont Fish and Game stated that the events “...could possibly jeopardize the future of hunting and affect access to private lands for all hunters,”³ and the Arizona Game and Fish Commission similarly observed that “...public outrage with these events has the potential to threaten hunting as a legitimate wildlife management function.”⁴ To date, four states have passed restrictions on killing contests, and two more states are currently considering taking similar action.

As MassWildlife scientists have noted, coyote killing contests do not reduce coyote populations or increase deer populations. More than 70 conservation scientists have issued a [statement](#) also refuting claims that killing contests reduce conflicts with humans or domesticated animals, asserting instead that, by disrupting coyote pack structure, such contests might in fact lead to more conflicts. Nonlethal, preventative measures are the best method for reducing conflicts with wildlife.

Lastly, wildlife killing contests are destructive to healthy ecosystems, within which all wildlife species play a crucial role. Coyotes, for example, provide a range of benefits to ecosystems including controlling rabbit and rodent populations, restricting rodent-borne disease transmission, cleaning up dead animal carcasses, and limiting the populations of mesocarnivores—including raccoons, skunks and foxes—that prey on songbirds and consume their eggs.

We thank MassWildlife for acknowledging its duty under the public trust doctrine to protect wildlife for all citizens and for proposing regulations to prohibit unethical killing contests, to prohibit wanton waste, and to tighten the harvest reporting requirements for foxes and coyotes. We ask the Fisheries and Wildlife Board and Commissioner Amidon to expeditiously approve and enact these regulations.

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¹ Todd Wilkinson, “A Death of Ethics: Is Hunting Destroying Itself?” *Mountain Journal*, December 12, 2018 at <https://mountainjournal.org/hunting-in-america-faces-an-ethical-reckoning>.

² Ted Williams, “Coyote Carnage: The Gruesome Truth about Wildlife Killing Contests.” *Yale Environment 360*, May 22, 2018 at <https://e360.yale.edu/features/coyote-carnage-the-gruesome-truth-about-wildlife-killing-contests>.

³ “Eastern Coyote Issues – A Closer Look,” Vermont Fish & Wildlife, January 2017 at <https://vtfishandwildlife.com/sites/fishandwildlife/files/documents/Hunt/trapping/Eastern-Coyote-Position-Statement.pdf>.

⁴ The Arizona Game and Fish Commission: Notice of Proposed Rulemaking, Title 12. Natural Resources Chapter 4 at <https://s3.amazonaws.com/azgfd-portal-wordpress/azgfd.wp/wp-content/uploads/2019/03/25093742/R12-4-303-NPRM.pdf>.