

BVA response to Wildlife Management in Scotland

Who we are

- 1) The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the UK with over 19,000 members. BVA represents, supports and champions the interests of vets in this country.
- 2) BVA Scottish Branch brings together representatives of local veterinary associations, BVA's specialist divisions, government, and research organisations in Scotland. The Branch advises BVA on the consensus view of Scottish members on local and national issues.
- 3) We are grateful for the opportunity to submit a response to this consultation on Wildlife Management in Scotland.

Summary

- 4) BVA recognises that it may be necessary to control free-ranging wildlife in certain circumstances where there is a negative impact on human and animal health, food, agriculture, property, or the environment. Any control should, however, follow recognised ethical principles¹, applying prevention and deterrents initially. Where control is shown to be necessary, methods which are as humane as possible must be used.
- 5) We therefore strongly welcome the proposals to ban the sale and use of glue traps. We are also calling for a ban on the sale and use of snares and are encouraged by the Scottish Government's commitment to carrying out a wider review of snaring, which will consider the welfare implications and look at whether there should be a ban on their use. The regulatory regime for wildlife control should be based on the prevention of welfare harm in the first place.
- 6) We also believe that there is a need for further research into, and development of, alternative methods for the deterrence of free-ranging wildlife as well as into more humane methods of trapping and killing free-ranging wildlife, where it is considered necessary.

Part 3: Trapping and snaring

3.1 Wildlife traps

25. The Scottish Government proposes that a person operating a wildlife management trap must apply for a unique identification number which they must then attach to any traps that they set outdoors, do you agree that this proposal should apply to (select all that apply):

- **Live capture traps for birds**
- **Live capture traps for mammals (except rodents)**
- **Traps listed in the Spring Trap Approval Order**
- **Rodent kill traps**
- **Live capture traps for rodents**
- None of the above
- Unsure
- Other traps (please specify)

- 7) Lethal traps have a significant potential to adversely affect animal welfare, as do non-lethal traps that are poorly designed and maintained. They can also result in unnecessary suffering of non-target species. There is currently no legally required process that the owner or user of the territory

¹ Dubois S, Fenwick N, Ryan E, Baker L, Baker S, Beausoleil N, Carter S, Cartwright B, Costa F, Draper C, Griffin J, Grogan A, Howald G, Jones B, Littin K, Lombard A, Mellor D, Ramp D, Schuppli C and Fraser D, 2017. International consensus principles for ethical wildlife control. Conservation Biology 31: 753-760.

where a trap is set has to complete, to assess whether the method chosen is a proportionate means to address the targeted problem.

- 8) We therefore support the proposal to apply a unique registration number to all of the above listed traps as a means of improving the traceability of traps and accountability of the operator. We believe that this is a valuable step to helping achieve improved enforcement action where traps are poorly designed or operated in contravention of animal welfare law.

26. The Scottish Government proposes that a person operating a wildlife management trap outdoors must successfully complete an approved course dealing with the relevant category of trap, do you agree that this proposal should apply to (select all that apply):

- Live capture traps for birds
- Live capture traps for mammals (except rodents)
- Traps listed in the Spring Trap Approval Order
- Rodent kill traps
- Live capture traps for rodents
- None of the above
- Unsure
- Other traps (please specify)

- 9) We agree that the training requirement should be applied to all the listed traps. Incorrect usage of traps can have significant welfare implications, not only for the target species but also their neonates and dependent young, as well as non-target species. Some forms of live capture traps such as cage traps may be viewed to carry less risk to animal welfare. However, they still represent a substantial welfare threat since the target animal is held in a device that may, by its structure and design, cause injury and stress, as well as significant behavioural restriction. Captured animals, including non-target species, can also be exposed to other factors such as hunger, thirst, high and low temperatures and the risk of predation.

27. This question should only be answered if you agree that training should be required for at least one of the traps listed in question 26. The Scottish Government proposes that a person operating a wildlife management trap outdoors must undergo refresher training every 10 years, do you agree that this proposal should apply to: (select all that apply)

- Live capture traps for birds
- Live capture traps for mammals (except rodents)
- Traps listed in the Spring Trap Approval Order
- Rodent kill traps
- Live capture traps for rodents
- None of the above
- Unsure
- Other traps (please specify)

- 10) We agree that the requirement to undergo refresher training should apply to all types of traps listed above. The training should take account of the latest research on animal welfare as well as technical developments which could have an impact on the operation of the above-listed wildlife traps.

28. Do you agree that record keeping and reporting requirements should be part of the registration scheme?

- 11) We agree that record keeping should be a requirement. This requirement should also cover data on non-target species that were caught or killed using licensed traps. The data collected this way could be a valuable source of information to assess the effectiveness of the traps. It should therefore be recorded electronically and connected with a centralised database.

- 12) We are also supportive of the reporting requirement to ensure that data is collected and

processed in a timely manner.

29. Do you agree that an individual found guilty of the offence of:
- using a trap without valid training from an approved body;
 - using a trap without being registered to do so;
 - using a trap without displaying an identification number correctly on the trap;
 - falsifying records or identification number;
 - using a trap on land without landowner permission;
 - failing to comply with the duty to keep trapping records.
- should be liable, on summary conviction, to imprisonment for a term not exceeding 6 months or a fine not exceeding level 5 on the standard scale (or both)? A level 5 fine is currently £5,000.

13) We do not have the expertise to answer this question.

3.2. Glue traps

32. Do you agree that the use of glue traps designed to catch rodents should be banned in Scotland?

- 14) Yes, we strongly agree with the proposal to ban both the sale and use of glue traps. BVA considers that glue traps are an inhumane method² of trapping and killing rodents and should be replaced by alternative methods of rodent control. We recognise that it may be necessary to control or eradicate rodents due to their negative impacts on human and animal health, food, agriculture, property and the environment. The methods used to control rodents are, however, controversial, due to their impact on animal welfare³⁴⁵ and this is especially so in the case of glue traps.⁶ Glue traps significantly compromise animal welfare for the period during which animals are trapped, and there are welfare concerns associated with methods of killing of trapped animals. The welfare concerns related to glue traps are significant and may include dehydration, hunger, distress, torn skin, broken limbs, hair removal, suffocation, starvation, exhaustion, and self-mutilation⁷⁸.
- 15) Glue traps are also indiscriminate and may capture wild and domestic species for which their use is not intended. Evidence from other parts of the UK shows that non-target species are regularly trapped by glue traps. Between 2015 and 2019, the RSPCA received 243 reports of glue trap incidents of which over 73% involved pets and non-target wildlife⁹.
- 16) Our policy position¹⁰ on glue traps contains further evidence of the welfare impact on both target and non-target species.

33. Do you agree that the sale of glue traps designed to catch rodents should be banned in Scotland?

² <https://www.ingentaconnect.com/contentone/ufaw/aw/2022/00000031/00000001/art00005>

³ Mason G and Littin K, 2003. The Humaneness of Rodent Pest Control, *Animal Welfare*, 12, 1-37

⁴ Meerburg BG, Brom FWA and Kijlstra A, 2008. The ethics of rodent control. *Pest Management Science*, 64, 1205–1211.

⁵ Yeates, J. 2010. What can pest management learn from laboratory animal ethics? *Pest Management Science*, 66, 231–237.

⁶ Fenwick, N., 2013. Evaluation of the humaneness of rodent capture using glue traps, prepared for the Canadian Association of Humane Trapping, 31 July 2013. Available at: <http://www.caht.ca/evaluation-of-thehumaneness-of-rodent-capture-using-glue-traps/>

⁷ Frantz SC and Padula, CM, 1983. A laboratory test method for evaluating the efficacy of glueboards for trapping house mice. In: *Vertebrate Pest Control and Management Materials: Fourth Symposium*, (Ed. by D. E. Kaukeinen), pp. 209–225. Philadelphia, PA: American Society for Testing and Materials.

⁸ Mason G and Littin K, 2003. The Humaneness of Rodent Pest Control, *Animal Welfare*, 12, 1-37

⁹ RSPCA, 2020. We're caring for a feral kitten rescued from a glue trap <https://www.rspca.org.uk/-/kitten-in-gluetrap>

¹⁰ <https://www.bva.co.uk/media/4362/full-bva-position-on-the-use-and-sale-of-rodent-glue-traps.pdf>

17) Yes, we agree. Glue traps are currently freely available to the general public with no restrictions on their sale. Marketing and packaging often make their use appear to be simple and a good alternative to using 'poisons'. Some retailers have already stopped their sale following campaigns by welfare groups¹¹. Furthermore, instructions for glue traps frequently fail to explain the need to kill the trapped rodent or provide examples of how to do this humanely. A blow to the head to result in instant death is the method advised by the professional pest control industry and regarded by experts as being 'humane'. However, it is questionable whether members of the public would be willing or able to do this effectively. A YouGov survey¹² of 2000 British adults carried out in 2015 found that only 20% of respondents would recommend killing a trapped animal using this method. More than half of the people surveyed said they either would not know what to do with an animal caught on a glue trap or would recommend an action that risked committing an offence under the Animal Health and Welfare (Scotland) Act 2006.

18) Ireland has already implemented legislation severely restricting the use of glue traps. The Wildlife (Amendment) Act 2000 (Irish Parliament 2000)³⁹ allows for the approval and regulation of certain traps under The Wildlife Act 1976 (Approved Traps, Snares and Nets) Regulations 2003¹³; glue traps are not listed as approved traps. It is an offence to import, possess, sell, or offer for sale unauthorised traps. There is provision for glue trap use under ministerial authorisation (licence) but there are no records of such licences having been issued.

34. Do you agree that there should be a two year transition period before the ban on glue traps comes into force?

19) In our view, the ban on the sale and use of glue traps should come into force immediately. Alternatives to glue traps already exist and research¹⁴ carried out to assess the humaneness of alternative methods came to the conclusion that the following methods were preferable:

- Deterrence and exclusion – by means of rodent-proofing and good hygiene
- Well-designed snap traps – these should kill extremely quickly if set appropriately and of good quality
- Electrocutation traps – electrocutation traps should be considered as one of the most humane methods of rodent control providing that they deliver an effective, instant stun
- Cyanide gas (fumigant) – cyanide gas can cause some discomfort but induces very rapid and painless loss of consciousness.

The research also listed alpha-chloralose (bait poison) as a more humane method but we would point out that this is a matter of degree and the search for as humane as possible a bait trap should be enhanced.

3.3 Snaring

36. Do you agree with the recommendations from the statutory review of snaring that operators should be required to update their records at least once every 48 hours, unless they have a reasonable excuse not to and that these records should be made available to the Police on demand if the police arrive at the location where the records are kept, or within 7 days to the police station?

20) Snares significantly compromise the welfare of caught animals, in some cases over a considerable length of time. Even when best practice is followed, checking snares at least once

¹¹ HSI UK, 2015. Inhumane, indiscriminate, indefensible: the case for a UK ban on rodent glue traps <https://www.hsi.org/wp-content/uploads/assets/pdfs/hsi-glue-trap-report.pdf>

¹² OHSI, 2015. Inhumane, Indiscriminate, Indefensible: The case for a UK ban on rodent glue traps. Available at: <https://www.hsi.org/wp-content/uploads/assets/pdfs/hsi-glue-trap-report.pdf>

¹³ O Irish Parliament (2003). Wildlife Act 1976 (Approved Traps, Snares and Nets) Regulations 2003 <http://www.irishstatutebook.ie/eli/2003/si/620/made/en/print>

¹⁴ Mason G and Littin K, 2003. The Humaneness of Rodent Pest Control, Animal Welfare, 12, 1-37

every 24 hours, the potential negative animal welfare impacts are significant and may include: dehydration and hunger/starvation (of the caught animal and any dependent young), fear and distress¹⁵ (manifesting as escape behaviour which may include self-mutilation and, in rabbits, tonic immobility, external and internal injuries, asphyxiation from strangulation, exhaustion, predation, exposure to the elements. Some animals may be left to die in the snare while others may be killed by methods that also compromise welfare, for example blunt force trauma may be attempted by those who are neither confident nor competent in such methods.

21) Snares may also capture 'non-target' species for which their use is not intended, including domestic animals and protected wildlife, resulting in death or significant injury to these animals.

22) We are therefore of the view that an outright ban on the use of snares, including homemade or adapted snares, by both the general public and trained operators should be introduced. As a result, we warmly welcome the Scottish Government's commitment to carrying out a wider review of snaring which will consider the welfare implications and look at whether there should be a ban on the sale and use of snares. Our policy position¹⁶ on snares sets out our views in more detail, including evidence of their inefficacy as an effective control method for non-urban fox populations.

23) We recommend that the review also includes further research into, and development of, alternative methods for the deterrence of free-ranging wildlife, where it is considered necessary, as well as looking at more humane methods of trapping and killing free-ranging wildlife, where it is considered necessary.

24) In the interim, until such a ban is introduced, we are supportive of this proposal

37. Do you agree with the recommendations from the statutory review of snaring that a power of disqualification should be introduced for snaring offences? A disqualification order can stop you from owning, keeping, selling, transporting or working with animals or running a service which involves being in charge of animals.

25) We agree with the proposal.

¹⁵ <https://sciencesearch.defra.gov.uk/ProjectDetails?ProjectId=14689>

¹⁶ <https://www.bva.co.uk/media/4626/bva-and-bvzs-position-on-the-use-and-sale-of-snares.pdf>