

BVA response to call for views on Wildlife Management and Muirburn (Scotland) Bill

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 United Kingdom issues.
- 3) We are grateful for the opportunity to submit evidence to the Scottish Parliament's Rural Affairs and Islands Committee on the Wildlife Management and Muirburn (Scotland) Bill.

Introduction

- 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 the Dubois international consensus principles for ethical wildlife control¹, applying prevention and deterrents initially. Where control is shown to be necessary, methods which are as humane as possible must be used. Any interventions (lethal or non-lethal) should be carefully planned, monitored and reviewed and should take into consideration the welfare of the targeted individual(s), other individuals of the same species, dependent neonates and non-target species.
- 5) We also believe that there is a need for further research into, and development of, alternative methods, including the use of new technologies where appropriate, 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.
- 6) In addition to our views on glue traps and wildlife traps we are also calling for a ban on the sale and use of snares with further details available in our position on snaring² 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.

Glue traps

Q1. Do you agree with the proposed ban on the use and purchase of glue traps (sections 1-3)?

- 7) Yes, we strongly welcome the proposed ban on the sale and use of glue traps. We consider that glue traps are an inhumane method of trapping and killing rodents and that they should be replaced by alternative methods of rodent control. We recognise that it may be necessary to

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.

² <https://www.bva.co.uk/media/4626/bva-and-bvzs-position-on-the-use-and-sale-of-snares.pdf>

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 additional welfare concerns associated with methods of killing of trapped animals.

- 8) A recent research study carried out with the input of fifteen experts with backgrounds in wildlife management, rodent management, rodent biology, animal and welfare science, and veterinary science and medicine assessed the relative welfare impacts of six lethal rat management methods. It found that glue traps had an extreme impact on animal welfare⁷. The welfare concerns related to glue traps include dehydration, hunger, distress, torn skin, broken limbs, hair removal, suffocation, starvation, exhaustion, and self-mutilation⁸⁹.
- 9) 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 wildlife¹⁰. Our policy position¹¹ on glue traps contains further evidence of the welfare impact on both target and non-target species.
- 10) 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 groups¹². 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 survey¹³ 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.
- 11) The Republic of Ireland has already implemented legislation severely restricting the use of glue traps. The Wildlife (Amendment) Act 2000 (Irish Parliament 2000) allows for the approval and

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-the-humaneness-of-rodent-capture-using-glue-traps/>

⁷ <https://www.cambridge.org/core/journals/animal-welfare/article/an-assessment-of-animal-welfare-impacts-in-wild-norway-rat-rattus-norvegicus-management/AEEE82AC49A55136E322A2900D8F6093>

⁸ 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.

⁹ Mason G and Littin K, 2003. The Humaneness of Rodent Pest Control, *Animal Welfare*, 12, 1-37

¹⁰ RSPCA, 2020. We're caring for a feral kitten rescued from a glue trap <https://www.rspca.org.uk/-/kitten-in-gluetrap>

¹¹ <https://www.bva.co.uk/media/4362/full-bva-position-on-the-use-and-sale-of-rodent-glue-traps.pdf>

¹² 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>

¹³ 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>

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regulation of certain traps under The Wildlife Act 1976 (Approved Traps, Snares and Nets) Regulations 2003¹⁴; 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.

12) We called for the ban on the sale and use of glue traps to come into force immediately as alternative methods for rodent control already exist. Research¹⁵ 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 of good quality and set and maintained appropriately
- 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 only briefly, and 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 a humane as possible bait trap should be enhanced.

13) 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. Where pest control is required, we support the ethical use of pest control methods, which first requires consideration of whether it is necessary control pests at all, and second, whether it is necessary to kill them for control.

14) With these considerations in mind, we support the use of integrated pest management (IPM)^{16,17}, which consists of following the below steps:

- 1) Prevention (the exclusion of rodents and carefully managing environments to prevent them becoming attractive to rodents);
- 2) Monitoring (to assist in pest control decision-making), and
- 3) Control (killing).

15) We are calling for a UK-wide ban on the sale and use of glue traps to ensure consistency in animal welfare legislation in all four nations and avoid enforcement issues arising from the use of glue traps purchased in one of the nations being used in another one. Wales has already proposed similar legislation to Scotland, and in England the Glue Traps Offences Act 2022 makes it an offence for members of the public to use glue traps. However, there are currently no plans for legislation in Northern Ireland.

¹⁴ Irish Parliament (2003). Wildlife Act 1976 (Approved Traps, Snares and Nets) Regulations 2003 <http://www.irishstatutebook.ie/eli/2003/si/620/made/en/print>

¹⁵ Mason G and Littin K , 2003. The Humaneness of Rodent Pest Control, *Animal Welfare*, 12, 1-37

¹⁶ Traweger, D., Travnitzky, R., Moser, C., Walzer, C. & Bernatzky, G. 2006. Habitat preferences and distribution of the brown rat (*Rattus norvegicus* Berk.) in the city of Salzburg (Austria): implications for an urban rat management. *Journal of Pest Science*, 79, 113–125.

¹⁷ Meerburg BG, Brom FWA and Kijlstra A (2008). The ethics of rodent control. *Pest Management Science*, 64, 1205–1211.

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Wildlife traps

Q2. Do you agree there is a need for additional regulation of the use of certain wildlife traps?

- 16) Yes, we agree. 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. 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.
- 17) The lack of a legally required process that the owner or user of the territory where a trap is set has to complete, to assess whether the method chosen is a proportionate means to address the targeted problem without a need to consider the use of or reflect on the impact of other methods, exacerbates the potential for detriment to animal welfare.

Q3. Do you agree with the proposed licensing system for the use of certain wildlife traps (sections 4-5)?

- 18) 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. We are therefore supportive of the licensing and training requirements proposed in the Bill in so far as they allow for improved 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.
- 19) We are also supportive of the introduction of record-keeping and reporting requirements as proposed in the consultation to allow for improved monitoring and assistance with enforcement activities. 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. There should also be an additional requirement stipulating the frequency at which traps should be inspected that forms part of the reporting requirements. Additionally, licence renewal should also involve an assessment of the impacts of any controls used. Sufficient resources will need to be made available to the licensing body to ensure that the proposed licensing system can operate effectively to achieve its aims.
- 20) Aside from the specific issues of the use of traps as they pertain to grouse moor management and raptor persecution, we believe that the regulatory regime for wildlife control should be based on the prevention of welfare harm in the first place. Any interventions (lethal or non-lethal) should be carefully planned, monitored and reviewed and take into consideration the welfare of the targeted individual(s), other individuals of the same species, dependent neonates and non-target species.'
- 21) We believe that there remains 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.

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