1) BVA is the national representative body for the veterinary profession in the United Kingdom and has over 16,000 members. Our primary aim is to represent, support and champion the interests of the veterinary profession in this country, and we therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.

2) The BVA’s Welsh Branch brings together representatives of the BVA’s territorial and specialist divisions, government, academic institutions and research organisations in Wales. The Branch advises BVA on the consensus view of the Welsh members on Welsh and United Kingdom issues.

3) Our response has been formulated in close liaison with the British Veterinary Zoological Society (BVZS), the specialist division of BVA recognised as having responsibility for the care and welfare of exotic pets, zoo animals and wildlife, and with input from our Policy Committee.

4) Whilst a large portion of the consultation relates to areas which are outwith our remit, we do have an interest in the animal welfare implications of snaring and as such our response focuses on this element. We believe that well-designed snares, set properly by trained operators in accordance with the relevant Code of Practice, and regularly checked, can provide a legitimate and practical method of capture for the purposes of humane dispatch. However, we recognise that the current regulatory framework relating to snares includes a number of Acts, and that failure to comply with a code of practice is not an offence in itself. For that reason we support the Welsh Government proposals for further regulatory action on the use of snares to improve animal welfare standards.

5) Regarding the specific proposals:

- Proposal 49: we support the proposal to place a requirement upon any person setting a snare to inspect it at least once every 24 hours. We agree that the current legal requirement for daily inspection allows interpretation which could leave some snares unchecked for almost 48 hours. The proposed clarification would help ensure that trapped animals are not subjected to unnecessary suffering prior to humane dispatch, and that non-target species are released promptly. We believe that ‘at least’ should be emphasised, and it should be clear that part of the checking process is to ensure that the snare remains free-running.

- Proposal 50: we support the proposal to require that any animal caught in a snare, alive or dead, must be removed when the snare is inspected, on the basis that such a requirement would support the accurate assessment of compliance with the proposed requirement to inspect at least once every 24 hours.

- Proposal 51: we support the proposal to apply controls in section 11 of the Wildlife and Countryside Act 1981 to all self-locking snares and not, as at
present, simply to those which are "of such a nature and so placed as to be calculated to cause bodily injury to any wild animal coming into contact therewith". We strongly support continuing to make it an offence to use a device that has been adapted in such a way that causes injury to any wild animal, including free running snares being adapted in such a way as to be used as self-locking. Snares should only be used for holding and restraining an animal, and not set with the intention of inflicting injury.

- Proposal 52: we also support the proposal that the offence in section 11(2)(a) of the Act should be amended to include the setting in position of any snare, trap, electrical device or poison which is likely (rather than calculated) to cause injury on the basis that it will remove lack of intent as a line of defence.

- Proposal 53: as legislation prohibits the operation of a self-locking snare and there is therefore no legitimate reason for the possession or sale of such a device, we support the proposal that there should be an offence to possess self-locking snares, which inflict unnecessary suffering on target and non-target species. We also propose the addition of ‘attempt to sell’ or similar appropriate language to encompass remote selling online where the seller is not physically in possession of the snare.

- Proposal 54: we support the proposal to amend legislation to protect land managers from uncontrolled intrusion from those setting snares without permission. It is likely that such an amendment will also contribute to a reduction in the use of illegal, adapted, inappropriately set, or infrequently inspected snares.

- Proposal 55: we support the proposal that Welsh Ministers should take a power to ban by order any type of snare. This would give flexibility to respond promptly in future to changes in design or other developments in relation to the possession or setting of snares.

6) Until such time as further research identifies more reliably humane methods to capture pest species for humane dispatch we support any proposals which seek to reduce the welfare harms associated with snaring, in particular those resulting from the time between capture and dispatch/release, the capture of non-target species, and the use of adapted snares. We would like to see further regulation of snares to improve welfare, including the introduction of unique identification numbers and technical specifications for free-running snares, incorporating sizing and the use of stops based on the species being targeted, as well as the development of a Code of Practice for snare use in rabbit control, and training for operators. The approach taken in Scotland provides a useful reference point. In conclusion, we support Welsh Government’s steps to further protect the welfare of wild animals through improved regulation in relation to the snares, supported by appropriate enforcement.

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