

## **PE1671/K**

Petitioner submission of 2 March 2018

As petitioners, we, Lisa Harvey and myself, Andrea Goddard, would like to provide Committee Members with a formal response to the written submissions which have been received and published on our petitions webpage.

We are very encouraged to read that 100% of formal submissions support public restrictions for the sale and use of glue traps in Scotland. Even those submissions received from the pest control industry recognise the probable widespread misuse of these traps by the public, especially as their use is not regulated or monitored in any way. The potential for glue traps to cause prolonged and extreme suffering to both target and non-target animals is great and very real, particularly when used by untrained users who may be unwilling and/or unable to dispatch trapped animals swiftly and in a humane manner.

55% of submissions and the 10 signatories on our petitioner submission (of 20 October 2017) support our call for a total ban on glue trap sale and use in Scotland, stating that there are indeed many alternative humane options available to the pest control industry, even in situations where other control methods cannot be used. These include catch and release trap systems, electronic acoustic deterrents, or more humane lethal traps. While we understand and of course appreciate the need to protect public health, we believe it is incumbent on the pest control industry to develop and invest in new control mechanisms which are demonstrably both humane and effective. In addition, we feel that an outright ban would be relatively quicker, easier and less expensive to implement than restricting use to the pest control industry, which would also involve developing and then managing a registration or licensing regime. Illegal sales would also be easier to control, especially via the Internet.

In terms of restrictions to pest control operatives support is mixed, and yet not unexpected. Industry representatives would like to retain use of glue traps as a method of 'pest' control, although both the Royal Environmental Health Institute and the British Pest Control Association also recognise that some form of industry

regulation (registration or license system) is necessary in order to restrict sale and use of glue traps to only 'competent personnel', to define who 'professional' users are and to ensure appropriate training in glue trap deployment has been undertaken. We note with interest the difference in opinion over the length of time that is appropriate to leave a glue trap unattended, potentially with an animal attached to it and suffering, the British Veterinary Association recommend hourly checking while the PMA Code of Conduct promotes 12-hourly checking. We believe that the latter is allowed for practical reasons only and would not prevent significant and prolonged suffering from occurring.

We would be most appreciative of the Scottish Government if a ban on the sale and use of these traps was implemented and written into Scottish law. At the very minimum we would like to see a public ban with restrictions on their use by pest control operatives, who we would like to see formally regulated in some way, i.e. via licensing (replicating the approach taken in New Zealand). An outright ban, however, is our ultimate objective, as we are against the inherent mental and physical suffering these traps inflict upon animals, however well trained the person is who deploys them.