

PE1671/L

Petitioner submission of 27 August 2018

As petitioners, we, Lisa Harvey and Andrea Goddard, would like to provide Committee Members with a formal response to the last Committee meeting of 26th April 2018 where evidence was provided by Cabinet Secretary for Environment, Climate Change and Land Reform, Roseanna Cunningham MSP.

It remains our position that the use of glue traps causes unacceptable unnecessary suffering to both target and non-target animals and that the only way to eradicate this altogether would be to prohibit their sale and use in Scotland. That said, we appreciate the practical difficulties of introducing a full ban at this point and therefore we welcome Ms Cunningham's intention to introduce legislative restrictions on the sale and purchase of rodent glue boards to the public and her acknowledgement that a robust licensing scheme for professional pest controllers is necessary to better regulate the industry. This will ensure that only specifically-trained practitioners will be able to purchase and deploy glue traps, and that these operators comply with industry Codes of Practice and are fully accountable.

Ms Cunningham suggested the Scottish Government may wish to approve an existing industry Code of Practice, such as the current Pest Management Alliance (PMA) Code of Best Practice for the Humane Use of Rodent Glue Boards. We see the value in this approach, particularly if a robust Code endorsed by the Scottish Government can be adopted as the industry standard, forming the basis of training and certification of practitioners by a body such as the PMA. We have consulted with the Humane Society International/UK (HSI UK), OneKind and the Wild Animal Welfare Committee (WAWC) and have compiled a list of suggested improvements to the current Code which would strengthen its capacity to reduce the suffering caused by glue traps. We hope to discuss these amendments with industry representatives and Scottish Government officials and would be happy to share them with the Committee.

One of the changes to the Code of Practice that we agree is fundamental is an increase in the frequency of deployed trap checks. Mason and Littin state that

*'because of the enormous distress these traps cause, even if the trapped animals are found after just a few hours and then humanely dispatched [...] rodents are likely to experience pain and distress through being trapped, the physical effects of the adhesive on functioning (e.g. suffocation), and trauma resulting from panic and attempts to escape, such as forceful hair removal, torn skin and broken limbs. After three–five hours, animals have been reported as covered in their own faeces and urine. When boards are collected, animals are also often squealing; one pest control operative even described them as "screaming their heads off". Some rodents also bit through their own limbs to escape.'*¹

Based on this evidence, the current recommendation of checking traps at least every 12 hours (PMA Code of Best Practice, January 2017) clearly exposes trapped animals to a high risk of unacceptable suffering and needs to be amended.

We welcome the Cabinet Secretary's acknowledgement of the wider problem regarding the absence of clear professional standards, regulations and competency requirements in

¹ Georgia Mason and Kate Littin, 'The Humaneness of Rodent Pest Control', *Animal Welfare* 2003, no. 12: 16, 23.

the 'pest control profession', which allows glue traps to be purchased and misused by unqualified persons. It is important to stress that the PMA's Code of Best Practice offers a guideline only and is not legally binding for glue trap users. We therefore believe that the existence of a Code of Practice alone, even in a revised version, is not sufficient in safeguarding the correct use of these devices to prevent unnecessary suffering. As an example, we refer to the initial incident that prompted the petition: Ms Cunningham understood that the glue trap in question had been misused by a member of the public, whereas it had in fact been placed by one of the UK's leading pest control companies.

The Cabinet Secretary raised her concern regarding the ban introduced by New Zealand's Animal Welfare (Glue Traps) Order 2009, and suggested the ban might not be legally robust owing to the exemption scheme for glue trap sale and use. Following correspondence with senior staff at New Zealand's Ministry for Primary Industries (MPI) and the SPCA New Zealand, we are able to confirm that exemptions for professionals to sell and use glue traps appear to be very limited, being issued on an annual basis only and subject to approval by MPI. Applications for approval are assessed on a case-by-case basis and require the applicant to provide written evidence that the person(s) utilising the traps are qualified professionals and fully trained, that the use and/or sale is in the public interest, and that all viable alternatives have been exhausted. Sellers and users operating under Ministerial approval must fulfil a range of conditions, including restrictions on who may use the traps and where they may be used, and must take actions to prevent non-target animals from becoming trapped and to dispatch trapped rodents humanely. They are also required to provide annual reports to MPI on trap checking, animal capture and euthanasia. These reports are monitored by the National Animal Welfare Advisory Committee (NAWAC), a committee set up under New Zealand animal welfare legislation to provide independent advice to government, and which also oversees the granting of Ministerial approvals.

According to the figures published on MPI's website, the number of annual approvals for glue trap sale has remained stable at only 2 per year since the full ban came into force in January 2015. In addition, the approval rate for professional use has fallen significantly from an initial 26 approvals to 11 in 2016 and 9 in 2017. This development would suggest either that applicants are failing to meet the requirements for approval (e.g. proof of adequate training, prior use of alternative control methods, use justified by public interest, etc.), or that professional pest controllers have been able to implement alternative measures in order to manage rodent issues. MPI were also able to provide us with data showing that the number of public reports recorded since 2015 has equally decreased, dropping from initially 31 public complaints and cases of illegal sale to 12 complaints in 2016 and 6 complaints in 2017.

Based on these encouraging findings we respectfully propose for Ms Cunningham and her team to consider actions to adopt a similarly robust approach in Scotland to New Zealand's current model. We understand that Dr Kate Littin, Manager of MPI's Animal Welfare Team, has offered to liaise with the Cabinet Secretary and her officials and to answer any questions they may have.

In the State of Victoria in Australia, legislation is in place to ensure that rodent glue traps can only be sold to commercial pest operators who may only use them on commercial food manufacturing premises, subject to compliance with a range of conditions set by the Minister for Agriculture. We understand that Jane Malcolm, Senior Policy Officer for Animal Welfare at Animal Welfare Victoria, has offered to provide insight to Scottish Government officials on the State of Victoria's public ban of rodent glue traps.

In conclusion, we thank the Committee for taking an interest in our petition, and we would be grateful if the Committee could keep it open and offer further support in order to ensure that progress is made. We have provided additional information in this response, which we will also share with the Scottish Government. At this stage we would appreciate a recommendation from the Committee that the Scottish Government should:

- engage with ourselves, officials from New Zealand and Victoria, and animal welfare organisations to develop future policy on the use of glue traps in Scotland;
- take steps urgently to restrict the sale of glue traps to certified commercial pest controllers only;
- work with the industry and animal welfare organisations to agree a revised Code of Practice, specifying and limiting the uses to which glue traps may be put and essential welfare measures, and to develop training and certification for commercial pest controllers.

We are grateful to HSI UK, OneKind and WAWC for advising us on a number of the issues discussed in this submission.