

PE1671/M

Petitioner submission of 20 September 2018

Comments on the current Pest Management Alliance (PMA) Code of Best Practice for the Humane Use of Rodent Glue Boards (revised version January 2017)

Introductory remarks

We agree with the general layout and structure of the PMA's Code of Best Practice. However, we suggest that some of the content requires amending in order to provide clear, succinct and unambiguous instructions to professional glue trap users and to ensure that glue traps are used as a last measure that causes the least amount of unnecessary suffering to trapped animals. In addition, the document will need to be reviewed to reflect any legislative changes made by the Scottish Government.

We have outlined our suggested amendments below:

Paragraph 1 [*'In order to protect ... minimise animal welfare concerns:'*]

- This paragraph should clearly state who under new legislation is permitted to purchase and use glue traps, in strict compliance with the Code of Best Practice and subject to proof of professional qualification and training (e.g. 'Rodent glue traps are prohibited from purchase and use by the general public and can only be sold to or used by registered commercial pest control operatives').
- It should be emphasised that glue boards should only be used where other means of control have been fully considered and trialled unsuccessfully.
- The suggestion that glue boards 'are not designed to physically harm rodents' should be removed and replaced with information on how these traps function
- Users should be warned of the risk of glue traps to cause acute physical suffering, fear and stress to trapped animals, especially if used inappropriately and if traps are not inspected as soon as possible within the prescribed intervals. For instance, the Pest Management Association of New Zealand (PMANZ) Code of Practice for Operational Procedures for the Humane Use of Rodent Glue Board Traps (January 2015) states that, *'[t]he use of rodent glue board traps has caused concern within the industry in terms of humaneness. Rodents caught on boards remain alive. This may cause the animals fear and stress'*.¹

Paragraph 3 [*'The definition of ... to catch rodents''*]

- In order to avoid any ambiguity, we suggest that the definition of rodent glue boards is amended. A similar wording could be adopted to that of the Victorian State Government on their Agriculture Victoria website: *'Glue traps have a non-drying adhesive applied to one side of a flat surface or contained in a shallow tray, for the*

¹ <https://www.rentokil.co.nz/assets/content/files/pmanz-code-of-practice.pdf> [accessed 15/08/2018]

*purposes of trapping small pest animals such as mice and rats'*²

Principle 1 [*Consider the risk hierarchy*]

- This section should state clearly: 'Due to the risk of causing acute suffering, rodent glue traps must only be used as a last resort after all other measures of control have been exhausted'.
- Glue board use should be reviewed every time the boards are checked and alternative methods reconsidered.

Principle 2 [*Trained and competent user*]

- This section needs to specify the type of required training, certification, qualification and/or other form of approval provided and regulated by a designated authority in order to ensure appropriate competency, and state that glue traps must be used in accordance with the Code of Best Practice.
- It should be added that the purchase of rodent glue traps will require producing a valid license or other certification issued by a designated authority as proof of competency.

Principle 3 [*Check rodent glue boards frequently*]

- The frequency of trap inspections needs to be increased and any suggested exemptions (e.g. impractical, weekends, bank holidays, unavoidable events, etc) removed to prevent any unnecessary unacceptable suffering of trapped target and non-target animals.
- We suggest that set traps should always be monitored using remote monitoring and notification devices that instantly alert the user when an animal has been trapped so that the animal can be attended to without delay. We refer the Cabinet Secretary to the MPI's guidelines for remote monitoring of live capture traps for vertebrates.³
- Records must be kept of the frequency of inspections and any delay within the agreed time period must be recorded and reasons given.
- The paragraph about the Animal Welfare Act (this will need to be changed accordingly if this is purely Scottish legislation) seems a bit lightweight. Glue boards potentially interfere with all the 'five needs' of the AWA. The AWA comes in to force the minute the animal is caught ('comes under the control of man'). This paragraph needs to be reworded.
- Arrangements involving third-parties, such as on-site personnel, must be fully documented.

Principle 5 [*Use the correct size rodent glue board for the pest species*]

² <http://agriculture.vic.gov.au/agriculture/animal-health-and-welfare/animal-welfare/humane-vertebrate-pest-control/glue-traps> [accessed 15/08/2018]

³ Download at <https://www.mpi.govt.nz/dmsdocument/27894/send>

- This section should state that only glue board traps designed for rodents may be used (this refers to the correct size, but also appropriate adhesiveness and type of trap).
- This section should include a statement that for each use the number of rodent glue traps must not exceed the minimal number sufficient to intercept, contain or isolate rodent activity.

Principle 6 [*Detailed records*]

- For the purpose of clarification, a list should be provided detailing all information that must be recorded. This should include the following: the date and time that the trap was set; the date and time that the trap was checked; the number of traps laid; the location of each trap (on a site plan); the number of rodents captured; whether a captured rodent was found alive or dead; whether a captured rodent was euthanised or released; the rodent species; whether any non-target species were captured, whether they were alive or dead and whether they were released or taken into veterinary care.
- Full records and complete risk assessment forms must be submitted annually to a designated authority to monitor glue trap use and ensure compliance with the Code of Best Practice.
- Full records must be kept and made available at all times, therefore producing copies of reports is highly advisable.

Principle 7 [*Dispatch of trapped rodents humanely*]

- It should be added that captured rodents should be euthanised without delay.
- When dispatching of a trapped rodent, users must follow the procedures of humane dispatch specified in the training and qualification by the designated authority (see Principle 2).
- Death of the captured rodent must be confirmed before disposal of the trap.

Principle 8 [*Protect non-target animals*]

- We suggest that this section must include the following instructions:
 - If an animal other than a rodent is captured on the rodent glue trap and is alive at the time the trap is checked and the operator is able to remove all glue from the animal, the operator must remove all glue and release the animal from the trap without delay.
 - If an animal other than a rodent is captured on the rodent glue trap and is alive at the time the trap is checked but the operator is unable to remove all glue from the animal, the animal must be taken to a veterinary practitioner immediately.
 - If an animal other than a rodent is released from a glue trap and is injured or suffering, it must be taken to a veterinary practitioner immediately, or humanely destroyed without delay if this is legally allowed.
 - Companion animals captured on glue traps must be released and returned to the owner, or if unidentified, delivered to an authorised officer of the local council immediately.

- We recommend that the following topics must be included in training for licensed operatives (see Principle 2): assessment of non-target animals for injury, methods of humane dispatch, killing of wild animals protected under wildlife legislation, and appropriate transportation to a veterinary surgery as necessary.
- The operator must have adequate training and resources to transport a captured animal immediately to a veterinary surgeon where required.
- The welfare of the animal is the responsibility of the operative.

Black information box [*'The humane use of ... Pest Technicians Association.'*]

- We suggest that this box is used to highlight any legislation and requirements relating to purchase and/or use of rodents glue traps, and to explain the legal repercussions, including penalties and prosecution, for misuse of traps by professionals and unqualified person(s) and failure to comply with the Code of Best Practice.



NEW REVISED VERSION JAN 2017

PEST MANAGEMENT ALLIANCE - CODE OF BEST PRACTICE HUMANE USE OF RODENT GLUE BOARDS

In order to protect public health within high-risk environments, the use of rodent glue boards remains an important route if all other options are considered inappropriate. Although rodent glue boards are not designed to physically harm rodents, their use raises valid concerns and they should only be sold to or used by technicians who have been given adequate training and are competent in the effective and humane use of this technique. The following principles must be followed in order to minimise animal welfare concerns:

All interventions aimed at the removal of rodents, including the use of rodent glue boards, have the potential to harm non-target animals and the environment. Although following best practice can mitigate these risks, they cannot be entirely avoided. Therefore, the principal strategy when choosing methods for the control of rodents is to employ the method or methods that have the least potential for adverse impact (i.e. are the least severe and least likely to catch non target animals) but which will be effective in the prevailing circumstances. This is the concept of "risk hierarchy". For more information see the CRRU Code of Best Practice via www.thinkwildlife.org

The definition of a rodent glue board is "any adhesive-coated surface used to catch rodents"

1. Consider the risk hierarchy

All other options for rodent control must be carefully considered before rodent glue boards are used. Detailed records must show why other control methods are either considered inappropriate or have failed. Where there is a rodent in a high risk environment, it may be appropriate for rodent glue boards to be placed strategically to ensure immediate control. Use of rodent glue boards should be based on individual risk assessment, but their use should be reviewed every 24 hours.

2. Trained and competent user

Those selecting the use of or using rodent glue boards for rodent control should be trained and competent in their use. This normally means a relevant certification/qualification and familiarity with the Code of Best Practice for their use.

3. Check rodent glue boards frequently

Where rodent glue boards are used these must be inspected at appropriate intervals. This should be within 12 hours of placing, or at least as soon as is reasonably practicable, including weekends and bank holidays. The pest controller may train one or more on-site personnel

to check the rodent glue boards at more frequent intervals in order to minimise the rodents' time spent on traps and/or free non-target species, but it remains the responsibility of the pest controller (under the Animal Welfare Act 2006) to deal with any animals trapped on the rodent glue boards, and to revisit at a minimum of every 12 hours.

If unavoidable events cause slight extensions to inspection intervals then the reasons should be recorded. Longer delays must be avoided (see contingency plan below). Where possible and practical, inspection times must be organised to minimise the time rodents are likely to be on the rodent glue board (e.g. if rodents are known to be active during certain periods, inspection times should be arranged with this in mind

The Animal Welfare Act 2006 requires that caught animals must not display any signs of undue suffering, therefore inspections times should be as frequent as necessary to mitigate against this.

Records must be updated after all inspections.

4. Have a contingency plan

A contingency plan must be in place so that in the event of an emergency a second competent person can be called upon to inspect the rodent glue boards and deal with any captures or safely remove the rodent glue boards as appropriate. Where it is known rodent glue boards will not be inspected at appropriate intervals they must be taken up (even if only temporarily).

5. Use the correct size rodent glue board for the pest species

The size of rodent glue board must be appropriate for the target species.

6. Detailed records

Detailed copies of records and location plans should be available on site at all times for all rodent glue boards laid during any treatment and must be updated as necessary to ensure traceability. Copies ensure information is available should site records be lost or unavailable.

7. Dispatch of trapped rodents humanely

Rodents trapped on rodent glue boards must be dispatched quickly and humanely by technicians with appropriate training in methods of dispatch. Drowning is not an acceptable method of dispatch.

8. Protect non-target animals

Rodent glue boards must be placed in such a manner that they do not present a risk to non-target species. In the event that a non-target animal is trapped, a freeing agent (a suitable food grade oil or similar emollient) should be applied to the animal for removal. If the trapped animal is injured in such a way that release would result in unnecessary suffering, it should be killed humanely. Non-targets should only be released at their site of capture, not elsewhere, and only if they appear to be physically unharmed and their release is not prohibited by law. Ensure when using rodent glue boards that a suitable emollient is available to hand.

9. Remove rodent glue boards at the end of treatment

At the end of treatment all rodent glue boards must be accounted for, removed by the technician and the records endorsed accordingly.

10. Dispose of rodent glue boards safely

Rodent glue boards should be disposed of with care. The sticky surface must be covered to avoid the accidental trapping of any species or subsequent misuse, and the rodent glue board should be disposed of safely and discretely in accordance with legal waste requirements.

11. Communication with the customer

This Code of Best Practice must be provided to the customer to make them aware of the standards to which the operative is working.

The humane use of rodent glue boards is the legal responsibility of the pest controller, and cannot be delegated to untrained people. All technicians must be suitably trained and competent in their application, maintenance and ultimate disposal including the dispatch of the target species and safe removal of non-target species.

This Code of Best Practice was produced after consultation with Defra, APHA, and Natural England.

The Pest Management Alliance consists of the British Pest Control Association, the Chartered Institute of Environmental Health, and the National Pest Technicians Association.