

PE1671/R

Petitioner submission of 9 January 2020

Broadly, we welcome the PMA's efforts to update the current CoBP in line with our previous suggestions, submitted on 20th September 2018, and are pleased to see it now specifies that rodent activity must be correctly identified prior to the use of glue traps and that the death of a trapped rodent must be confirmed before disposal.

However, we are disappointed that many of our key recommendations and suggestions aiming to prevent misuse and unacceptable suffering have not been addressed in the revised version, or indeed that some important requirements have been removed. We enclose a detailed overview of the changes proposed by the PMA but would like to highlight the following points of particular concern:

- The requirement to keep detailed records justifying the use of glue trap has been removed.
- The recommendation that a risk assessment and a review of the use of glue traps should be carried out every 24 hours has been removed.
- There has been no increase in the frequency of inspections of set traps.
- There is no requirement to provide proof of the operator's competency prior to purchase and use.
- There is no requirement to keep full records of the frequency of inspections, delays, details of use, trapped species, etc.
- There is no requirement to submit full records to a designated authority in order to monitor and ensure correct use and compliance with the CoBP.

With regard to the proposed level of training, now specified as RSPH Level 2 Award in Pest Management or equivalent, we have requested a copy of the RSPH course's content and scope to ensure the training on glue trap use is indeed suitable and sufficient.

Although we welcome an updated CoBP, we remain nonetheless concerned that the pest control industry in Scotland continues to be unregulated, which renders the guidelines of the CoBP unenforceable in practice. Subsequently, the use of glue traps by pest control operatives, even by those employed by members of a professional industry association, remains open to misuse. The case that prompted the petition showed appalling suffering in a non-target animal captured in a glue trap set, as far as we understand it, by a large company that is, and was at the time, a member of the British Pest Control Association. This demonstrates that wildlife will continue to be at high risk unless regulations are properly enforced.

To this end we would like to reiterate our recommendation for the Scottish Government to adopt either a complete ban on the sale and use of glue traps (as has been recently announced by the State Government of Victoria, Australia), or a public ban of their sale and use alongside additional and formal pest control industry regulations, such as licensing of pest control operators and/or licensing the glue traps uses (as in New Zealand).

Our position remains as stated in the Petition, in that we request the Scottish Parliament to support a ban on the sale and use of glue traps and boards in Scotland.

Thank you for giving us the opportunity to respond to the PMA's draft CoBP 2019. We hope you will take our comments into consideration when it is next discussed by the Public Petitions Committee.

What has changed in the Pest Management Alliance's draft 'Code of Best Practice (CoBP) Humane Use Of Rodent Glue Boards – Revised Version 29 October 2019'

Positive changes	Negative changes	No changes (with regards to the recommendations submitted by the petitioners and supporting groups on 27 August 2018)
- The authors acknowledge the potential to cause suffering (see 1 st paragraph)	- The authors have removed the statement that 'All other options for rodent control must be carefully considered before rodent glue boards are used' (see CoBP 2017, '1. Consider the risk hierarchy')	-The authors have not changed their definition of glue traps (see 3 rd paragraph) => <i>petitioners' recommendation: adopt similar wording to that of the State of Victoria (AUS) to avoid ambiguity</i>
- give advice on how to locate and identify extent of rodent activity for more targeted approach (see '1. Before choosing Glue Boards')	- have removed the requirement to keep detailed records justifying use (see CoBP 2017, '1. Consider the risk hierarchy')	- have not increased the frequency of inspections (min. every 12 hours) (see '3. Check rodent glue boards frequently') => <i>petitioners' recommendation: more frequent checks</i>
- recommend to avoid 'blanket' approach to reduce risks to non-target species (see '1. Before choosing Glue Boards')	- have removed the suggestion to carry out an individual risk assessment and to review the use of glue traps every 24h (see CoBP 2017, '1. Consider the risk hierarchy') => <i>our proposal: review use after every check on set traps</i>	- do not state that adequate training on use is mandatory prior to purchase and use => <i>petitioners' recommendation: adequate training must be mandatory</i>

<p>- specify a recommended level of training (see '2. Training and competent user')</p>	<p>- have removed the requirement to provide the client with a copy of the Code of Best Practice (see CoBP 2017, '11. Communication with the customer')</p>	<p>- have not changed the exemptions affecting the frequency of inspections (e.g. weekends, bank holidays, impractical, unavoidable events, etc) (see '3. Check rodent glue boards frequently') => <i>petitioners'</i> <i>recommendation: remove exemptions to avoid unnecessary suffering of target and non-target animals</i></p>
<p>- suggest the use of reliable remote monitoring technology to reduce the amount of time spent by the animal on the trap (see '4. Remote Monitoring of Glue Boards')</p>		<p>- have not specified the circumstances under which the use of glue traps is considered justified (e.g. no clarification of 'high-risk environment') => <i>petitioners'</i> <i>recommendation: clarify</i></p>
<p>- require that death of trapped rodent is confirmed before disposal (see '7. Dispatch of trapped rodents humanely')</p>		<p>- have not added any requirement for proof of competency prior to purchase and use, e.g. valid licence, other certification or professional association membership => <i>petitioners'</i> <i>recommendation: add requirement in order to prevent misuse</i></p>
<p>- recommend that glue board use is discussed with client, inspection times are arranged as necessary, and an action plan is agreed on before treatment (see '11. Communication with the customer')</p>		<p>- have not added any requirement for records to be kept of the frequency of trap inspections and any delays, and reasons given => <i>petitioners'</i> <i>recommendation: add requirement in order to monitor compliance</i></p>
<p>- mention additional warning of the potential of glue traps to cause</p>		<p>- have not added any requirement to use no more traps than the</p>

suffering (see black box at bottom)		minimal number sufficient to intercept, contain or isolate rodent activity => <i>petitioners'</i> <i>recommendation: add requirement</i>
		- have not added any requirement to record details of use (e.g. date and time of setting and inspecting traps, number and location of traps, captured species, state of captured animal, etc) => <i>petitioners'</i> <i>recommendation: add requirement</i>
		- have not added any requirement to submit full records and risk assessment to a designated authority => <i>petitioners'</i> <i>recommendation: add requirement in order to ensure correct use and user's compliance with the CoBP</i>
		- have not provided instructions on how users should deal with captured non-target animals (e.g. seek veterinary advice if controller cannot remove glue) and companion animals (return to owner or council) => <i>petitioners'</i> <i>recommendation: provide further instructions in order to protect welfare and prevent further unnecessary suffering</i>
		- do not require the operator to have adequate training and resources to transport a captured

		<p>animal to a veterinary practice where necessary => <i>petitioners'</i> <i>recommendation: add requirement</i></p>
		<p>- do not state what (legal) repercussions the misuse by professionals and unqualified persons may entail, nor what action will be taken in cases of non-compliance with the Code of Best Practice => <i>petitioners'</i> <i>recommendation: specify repercussions, including penalties and prosecution, for misuse of traps and non-compliance with Code of Best Practice</i></p>