

PE1671/S

Pest Management Alliance submission of 28 February 2020

The Pest Management Alliance (PMA) are grateful for the petitioner's comments and we have provided a response to these in red below:

- The requirement to keep detailed records justifying the use of glue trap has been removed.

This is not the case. Bullet point 6 states that records should be kept for a minimum of 3 years. This includes any risk assessments detailing why this course of action was chosen and all treatment reports relating to the work.

- 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.

This is not the case. Bullet point 3 recommends that glue boards should be inspected within 12 hours of placing or soon as practicable taking account of bank holidays and weekends. If it assists, wording could be added to clarify that a review of the risk assessment must also be carried out with 24 hours or as dictated by the risk assessment.

- There has been no increase in the frequency of inspections of set traps.

Please see the response to the bullet point above. The frequency of inspection was not reduced due to the need to ensure that if glue boards are used, then their maximum effectiveness is required. It should be remembered that this is the maximum time for checking and that technicians are encouraged to check more frequently where possible. The danger with over checking is that this will disrupt rodent behaviour and therefore prolong the treatment. This would have the obvious effect of being damaging to public health.

However, it should be recognised that the professional sector has a code of practice in place to help ensure this happens. No such guidelines exist within the amateur sector and therefore, no controls exist. Glue boards are readily available for domestic/amateur use and we would support a ban in this sector.

- There is no requirement to provide proof of the operator's competency prior to purchase and use.

The supply sector is not under the control of the PMA although we work closely with them to ensure good practice. This is evidenced through the main pest control suppliers ensuring that the COP is printed on the reverse of all glue boards prior to sale.

- There is no requirement to keep full records of the frequency of inspections, delays, details of use, trapped species, etc.

This is not the case. Bullet point 6 states that 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. Professional pest controllers are very used to providing detailed

records in other areas of control, for example in the use of anticoagulant rodenticides.

- 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.
There is no designated authority in Scotland or elsewhere in the UK. Accordingly, this is not within the remit of the PMA and would be the decision of the respective governments. More generally, the Animal Welfare Act 2006 and Animal Health & Welfare Act 2006 provides the protections for animal welfare and the penalties if these requirements are not implemented.

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.

Noted.

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.

Glue boards are a tool to provide a quick and responsive solution in maintaining the health of the public. Their use in critical public health areas (for example, hospitals, schools, food premises, medical facilities etc.) where a timely control is needed should not be lost but controlled. There would be a tangible impact on public health in such premises where a short sharp treatment is needed to gain control. The pest control industry is not regulated in any area of the UK. The industry self-regulates and the existence of the COP is evidence of our commitment to good practice and the preservation of animal welfare. Furthermore the organisations represented at the PMA provide on-going training courses at workshops and forums for professional pest controllers.

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).

The PMA feel that the New Zealand code could be confusing and would have an impact on public health. This is because the use of glue boards is needed for wider use than just commercial food premises.

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 1st 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 3rd paragraph) => <i>petitioners' recommendation: adopt similar wording to that of the State of Victoria (AUS) to avoid ambiguity</i>
<i>Whilst it is not the same wording, the PMA have defined what they are and have included that they can cause suffering.</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>
<i>The previous version of the document used to have 24 hours the same as the Victoria example, but have reduced this period to 12 hours which is more frequent than the quoted Victoria code. As stated above, we have not removed the need for records to be kept, in fact we have added the requirement for them to be kept for 3 years.</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.	- do not state that adequate training on use is mandatory prior to purchase and use => <i>petitioners' recommendation: adequate training must be mandatory</i>

	Consider the risk hierarchy') => <i>our proposal: review use after every check on set traps</i>	
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The proposed PMA code makes direct reference to the concept of "risk hierarchy". For more information see the CRRU Code of Best Practice via www.thinkwildlife.org However, the PMA agree that this could be more clear. We do not have authority to make training mandatory prior to purchase, but the document states that Glue Boards 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.

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- specify a recommended level of training (see '2. Training and competent user')	- 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')	- 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' recommendation: remove exemptions to avoid unnecessary suffering of target and non-target animals</i>
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Reference to the RSPH qualification or equivalent has been inserted. The PMA agree that the requirement to provide the client with a copy of the Code of Best Practice should be added back to the document, with potential exemptions for practicality.

- 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')		- 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' recommendation: clarify</i>
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If requested, the PMA could define this, but we would need to balance the relative brevity of the document so that it remains impactful and providing additional definitions that would lengthen the document. Such premises could include hospitals, schools, food prep areas, medical facilities etc.

- require that death of trapped rodent is confirmed before disposal (see '7. Dispatch of trapped rodents humanely')		- have not added any requirement for proof of competency prior to purchase and use, e.g. valid licence, other certification or professional association membership
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		=> <i>petitioners' recommendation: add requirement in order to prevent misuse</i>
<i>Whilst reference to the RSPH qualification or equivalent has been inserted, The PMA have no control over this issue.</i>		
- 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')		- have not added any requirement for records to be kept of the frequency of trap inspections and any delays, and reasons given => <i>petitioners' recommendation: add requirement in order to monitor compliance</i>
<i>Please see similar comments above relating to detailed records and the need for such to be kept for 3 years.</i>		
- mention additional warning of the potential of glue traps to cause		- have not added any requirement to use no more traps than the
suffering (see black box at bottom)		minimal number sufficient to intercept, contain or isolate rodent activity => <i>petitioners' recommendation: add requirement</i>
<i>The number and location of traps is dictated by the risk assessment. The total number used would not impact on potential suffering.</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' recommendation: add requirement</i>
<i>Please see similar comments above relating to detailed records and the need for such to be kept for 3 years. Again, but would need to balance the relative brevity of the document so providing additional information that would lengthen the document.</i>		
		- have not added any requirement to submit full records and risk assessment to a designated authority => <i>petitioners' recommendation: add requirement in order to</i>

		<i>ensure correct use and user's compliance with the CoBP</i>
<i>As detailed above, there is no designated authority for pest control operations.</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' recommendation: provide further instructions in order to protect welfare and prevent further unnecessary suffering</i>
<i>Reference is already made within the document - 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.</i>		
<i>It is the view of the PMA that the additional time taken to transport an animal to a vet would cause more unnecessary suffering.</i>		
		- do not require the operator to have adequate training and resources to transport a captured
		animal to a veterinary practice where necessary => <i>petitioners' recommendation: add requirement</i>
		- 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' recommendation: specify repercussions, including penalties and prosecution, for misuse of traps and non-</i>

		<i>compliance with Code of Best Practice</i>
<i>It remains the responsibility of the pest controller (under the Animal Welfare Act 2006 and Animal Health & Welfare Act 2006) to deal with any animals trapped on the rodent glue boards. This is addressed in the document. The PMA cannot state what would happen if prosecuted as we do not have any control over this.</i>		

In an effort to progress this matter, we have also opened a dialogue with the petitioners and have held a teleconference with them. We hope the above comments address the identified concerns and remain willing to work with all parties to find an appropriate solution that preserves public health and sufficiently addresses any animal welfare concerns.