

PE1671/U

Petitioner submission of 17 April 2020

We, the undersigned co-petitioners and representatives of groups supporting this petition, would like to take this opportunity to respond to the comments made by the Scottish Government and by the Pest Management Alliance (PMA) in relation to PE01671 on 23rd March and 28th February, respectively. It appears from the PMA's comments that in many instances they may have misunderstood the points raised in our submission from 9th January 2020 regarding the proposed draft of the 'PMA Code of Best Practice Humane Use of Rodent Glue Traps – Revised Version 29 October 2019'. We have therefore produced a detailed response to the PMA's submission, which we would be happy to provide to the Public Petitions Committee.

We welcome the Scottish Government's reiteration of its intention to consider taking legal action to prohibit the use and sale of rodent glue traps by members of the public in Scotland. We also appreciate that the PMA have stated their support of a formal ban on glue traps in the 'amateur sector'.

However, we remain concerned as to how 'professional user' compliance with any Code of Best Practice - whether in the form of a Scotland-specific code as suggested by the Scottish Government, or indeed the PMA's proposed revised code - can be effectively applied, monitored or enforced. We recently engaged in a conversation with representatives of the PMA and found that they were unable to give any reassurance on this matter. As they repeatedly acknowledge in their submission, the pest control industry is currently not regulated in the UK and the PMA has provided no evidence that they would be able to effectively regulate the use and purchase of glue traps if these were to continue to be available to 'professionals'. We therefore ask the Scottish Government to consider implementing a complete ban on the use and sale of glue traps in Scotland.

Not only is compliance with the guidelines of a code not mandatory; the PMA, and the professional associations it represents, admit that they are in fact unable to ensure users receive training prior to purchase. In addition, they state in their submission that they are unable to impose restrictions on the supply sector. In light of these deficiencies, it would seem that industry self-regulation cannot ensure protection of animals from unacceptable and unnecessary suffering. Allowing pest control practitioners to continue to use and purchase glue traps in Scotland will likely lead to many more cases of animals, including protected species, suffering on glue traps laid by 'professionals' - as was the case in the incident that sparked this petition.

As members of the Scottish Government considering this matter may already be aware, the State Government of Victoria, Australia, recently made the decision to revoke its exception for commercial pest controllers to be able to buy and set rodent glue traps. Instead, the Victorian Government has adopted an outright ban on the sale, setting and use of all glue traps 'capable of trapping an animal', as part of its [Prevention of Cruelty To Animals Regulations \(POCTA\) 2019](#). In addition to animal welfare considerations, key reasons for this decision were the significant concerns over users' compliance with existing restrictions and enforcement of an exemption for professional users, as stated in the [Regulatory Impact Statement](#) (Section 3.4.6):

'In the current regulatory environment stakeholders have raised concerns about the continued use of glue traps in any circumstances and that glue traps are being sold and used illegally in external locations. This can result in the capture of wildlife and non-target species. The POCTA Regulations 2008 aimed to limit the sale and use of glue traps to commercial pest controllers. Under the current regulatory provisions, it can be difficult to ensure compliance in relation to the use and sale of glue traps. Users are required to be commercial pest controllers and have gained approval from the Minister for the use of the trap. However, enforcing the sale of glue traps only to approved commercial pest controllers is difficult as there is no limitation on where they can be sold. There are concerns that glue traps are currently available for sale to the general public, and that 'insect glue traps' are being sold that are capable of catching animals.'

The new regulation also prohibits devices that may not be expressly marketed for use against rats or mice but may, unintentionally or purposely, be set and catch such species. Whilst insect glue traps are exempt, these are prescribed to have a barrier or other design features to prevent an animal from coming into contact with the adhesive surface.

It seems questionable that the UK pest control industry insists that glue traps should be available in order to be employed in certain, only vaguely-defined, situations, given the Victorian Government's decision that there is no sufficient justification for allowing restricted use in any circumstances. We noted that the PMA provided no comment on the regulations in Victoria in their submission.

We welcome the Scottish Government's decision to establish an Animal Welfare Commission and would be keen to engage with the commissioners responsible on how to progress this matter. In particular, we would welcome the opportunity to discuss with the Minister for Rural Affairs and Natural Environment, Ms Mairi Gougeon MSP, and her team, as well as the Commission, on

- a) how and within what timeframe the Scottish Government proposes to introduce a public ban, and
- b) how it intends to ensure that glue traps can only be purchased and employed by a fully-qualified pest control practitioner, used as a last resort and operated in a way that causes no unnecessary suffering to trapped rodents and is safe for other wildlife.

Finally, we are grateful to Christine Grahame MSP for recently lodging Motion S5M-21244, asking the Scottish Government to consider the merits of an outright ban. The Motion has received cross-party support and we look forward to a debate in due course.

A copy of this letter has been sent to the Minister for Rural Affairs and Natural Environment and we look forward to her response. In the meantime, we hope that you will take our comments into consideration when the petition is next discussed by the Public Petitions Committee.