

PE1671/W

Petitioner submission of 8 September 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 Pest Management Alliance (PMA) in relation to PE01671 on 20th August 2020.

We acknowledge the PMA's most recent submission and note that the PMA continues to assert that they adequately self-regulate glue trap use within the industry by providing an industry-standard (but not mandatory) Code of Best Practice and an (also not mandatory) industry training course. However, it is disappointing that they, again, fail to specify and provide evidence of what regulatory systems and measures they have in place to achieve this in practice. As yet, we are still waiting to receive details of the training programme (RSPH Level 2 Award in Pest Management) referred to in the PMA's proposed revised Code of Best Practice 2019, which the PMA states is designed to ensure glue trap operators are fully qualified in their use (we had requested copies of the course content in our submission of 9th January). Crucially, we are not convinced by the PMA's claim that the industry is able and well-equipped to self-regulate when they have repeatedly acknowledged in their submissions that the sector is unregulated and that they, for instance, 'do not have authority to make training mandatory prior to purchase [of glue traps]¹'. Not only does the incident that sparked this petition show that glue traps are liable to misuse by members of the bodies that the PMA represents; in addition, the PMA has brought forward no evidence so far to demonstrate if and how it is currently able to ensure that glue traps are used correctly and safely by pest control operators and organisations that are not members of the PMA.

Another fundamental, practical issue not addressed by the PMA's submission is how they or the Scottish Government are to ensure that glue traps can only be purchased and deployed by a fully qualified pest control practitioner. We are concerned that presently, without an industry-wide registration or licencing system it is impossible for suppliers, shops or manufacturers to differentiate between professional pest controllers and members of the general public who wish to make a purchase.

We appreciate the PMA's stated concern to protect public health. However, we refer to the warnings by leading public health bodies that the use of glue traps in fact poses a danger to human health. For instance, the Centers for Disease Control and Prevention (CDC), the principal public health institute in the US, advises against the use of glue traps to manage mice and rats:

*'We do not recommend using glue traps or live traps. These traps can scare mice that are caught live and cause them to urinate. Since their urine may contain germs, this may increase your risk to being exposed to diseases.'*²

¹ PMA (2020) [Submission PE1671/S](#)

² [Centers for Disease Control and Prevention \(2010\) Article 'Trap Up!'](#)

Similarly, the Canadian Association for Humane Trapping (CAHT) warns in its report on the *Evaluation of the Humaneness of Rodent Capture Using Glue Traps* (2013) that,

*‘some evidence suggests that use of glue traps can contribute to human health hazards associated with rodents, or reduce the effectiveness of attempts to minimize them. Deficiencies in trap management and timely disposal of dead rodents can result in contamination from rodent urine, faeces and decomposing carcasses. This can cause, for example, impacts to humans with asthma and rodent allergies (Phipatanakul et al. 2012), blowfly infestations (Beckendorf et al. 2002) and illness from hantavirus (Health Canada 2013). Due to the health hazards of coming into direct **contact with** wild rodents, it is difficult to humanely kill those still alive and caught in a glue trap.’³*

This evidence, including that by reputable bodies such as the CDC, contradicts the argument put forward by the PMA that glue traps should be permitted for sale and use *because* they are particularly suited to protecting people’s health. Indeed, it suggests that the industry’s proposal to apply glue traps in high-risk environments and in the immediate proximity of vulnerable people (e.g. in hospitals, kitchens and schools) could in fact have detrimental consequences to public health.

We also note that the PMA have provided no evidence to support their claim that the licensing scheme implemented by the New Zealand Government for professional users could have a negative impact if replicated in the UK. In fact, newly published figures from the New Zealand Government show that applications for licences to deploy glue traps have fallen continually since their ban in 2015, suggesting that adequate alternatives have been found or developed and are being deployed successfully.⁴ This confirms our understanding that glue traps are not only inhumane and indiscriminate, but also indefensible and unnecessary.

It is for these very pertinent reasons that we reiterate our call for an outright ban on the sale and use of rodent glue traps in Scotland.

We hope that you will take these comments into consideration on the 17th September 2020 when the petition is next discussed in Parliament by the Public Petitions Committee.

³ Canadian Association of Humane Trapping (2013) [Evaluation of the Humaneness of Rodent Capture Using Glue Traps](#) by Nicole Fenwick, M.Sc.

⁴ [NZ Ministry for Primary Industries \(2020\) Traps & devices](#)