

INHUMANE INDISCRIMINATE INDEFENSIBLE:

THE CASE FOR A UK BAN ON RODENT GLUE TRAPS





CONTENTS

Executive summary	3
Introduction	4
Inhumane	5
Glue traps and UK law	8
UK public use of and attitudes to glue traps	9
Indiscriminate	10
Indefensible	10
Humane, non-lethal solutions	12
Conclusion and recommendations	15



EXECUTIVE SUMMARY

GLUE TRAPS ARE A CRUDE AND BASIC RODENT ERADICATION PRODUCT THAT ARE WIDELY AND PUBLICLY AVAILABLE ON THE UK MARKET. Designed to trap, but not kill, rats and mice, the innocuous images and evasive wording on their packaging belie the evidence that shows their use routinely causes trapped animals extreme physical pain, suffering and a death that takes hours or even days.

Used by professional rodent exterminators as a last resort when all other options have failed (at least in theory), the industry, represented by the Pest Management Alliance¹, has drafted a Code of Best Practice² in order to promote the most humane use of the traps by professionals. Yet, rodent glue traps are also sold throughout the UK for domestic use both online and in stores. According to a recent poll, almost a quarter of the UK public has used or would consider using them³. Many websites and hundreds of retailers, including corner-shops, pet shops, chemists, hardware stores, and DIY and garden centres, sell these traps to members of the public whether or not they have tried, or even considered, other options.

The sale of glue traps to the public puts the purchaser at risk of breaking the law without even realising it. Unless the person who laid the trap checks it frequently, and kills a caught animal immediately and humanely (with one sharp blow), he or she may have caused 'unnecessary suffering'. This is a prosecutable offence under the Animal Welfare Act (2006). Our polling shows that the majority of people are either not informed, willing, able, or motivated enough to avoid causing 'unnecessary suffering' when using glue traps.

An additional cause for concern is the accidental capture of non-target animals, including birds and cats, who may be injured and even perish after becoming stuck to a carelessly-placed trap.

"The RSPCA is opposed to the manufacture, sale and use of any glue-type trap because they cause unacceptable suffering and are, by their nature, indiscriminate."⁵

For these key reasons, Humane Society International, supported by the RSPCA, is calling on the UK government to follow the examples of Ireland and New Zealand and ban the public use of glue traps, coupled with significantly restricting and formally regulating their use by industry. This ban would be a critical first step in a suite of measures we are advocating, to ensure that the welfare of animals termed 'pests' is properly and consistently protected under UK law.

A YouGov poll of 2,000 British adults conducted on behalf of Humane Society International in June 2015⁴ found that:

- More than half of the people surveyed said they either wouldn't know what to do with an animal caught on a glue trap or would recommend an action that risked committing an offence under the Animal Welfare Act (2006).
- The latter included 9% who said they would drown the animal and 6% who said they would leave the animal to die on the trap.
- Only 20% of respondents would recommend killing a trapped animal using the method advised by the professional pest control industry and regarded by experts as being 'humane' (hitting the animal with a sharp blow).
- 68% agree glue traps should be banned in the UK.

¹The Pest Management Alliance consists of the British Pest Control Association, the Chartered Institute of Environmental Health, the National Pest Technicians Association and the UK Pest Controllers Organisation

² http://www.cieh.org/uploadedFiles/Core/Policy/Environmental_protection/Pest_management/NPAP/COP_Glue_Boards.pdf

³ All polling figures, unless otherwise stated, are from YouGov Plc. Total sample size was 2,044 adults. Fieldwork was undertaken between 16th and 17th June 2015. The survey was carried out online. The figures have been weighted and are representative of all GB adults (aged 18+).

⁴³ ibio

⁵ Review of 2014, Science Group, RSPCA



INTRODUCTION

It could be said that over the course of time, no other animals have been despised, and demonised, as much as rats and mice. These sentient, intelligent and intrepid little creatures are feared, reviled, persecuted and exterminated in unquantifiable numbers.

Rats and mice live alongside us, thrive because of us, and survive in spite of our attempts to eradicate them. Through a combination of intolerance and inconsistent ethics, they have cruelties inflicted upon them that most people would deem unthinkable if applied to other species, and from which other species are protected legally.

In order to 'control' these animals, a selection of products is available including repellent sprays, ultrasonic devices, poisons and several different types of traps, some lethal and some intended for live release. These trapping and/ or killing tools are widely available from local hardware and homeware stores, discount and corner shops, including some branches of Londis and Costcutter, as well as in some garden and DIY centres, certain chemists, Post Office stores and even some pet shops. Many online retailers, including Amazon, also carry them, as well as specialist 'pest control'

websites. Many major trade wholesalers also supply them.

Across all categories there is potential for products to be more or less humane. Glue traps are not intrinsically lethal, but neither are they in any way humane. The fact that the 'pest control' industry has drafted guidelines on how its technicians should use them, as a last resort, is indication of the gravity with which they should be treated.

What are glue traps?

Also known as glue boards or sticky boards, they are a basic device consisting of a tray or piece of card coated in an extremely strong, non-setting adhesive. The traps are designed to catch and immobilise rats and mice, but not to kill them. They are very cheap, typically costing between 99p to a couple of pounds for two traps. Their packaging features images that are deceptively cheerful – cartoon mice, for example – and even photos of the wrong species: our researcher found one brand with a photograph of a guinea pig on the packet and another of a gerbil.

"Please don't use glue traps. I naively didn't think what they would entail when our next door n eighbour had a rat and when we put a glue trap a small mouse got caught and I cried for hours because it was so horrific. It was dying slowly all its limbs were broken, I gave it some water and food and my husband had to end its life because it was obviously in so much pain. It was one of the saddest things I have seen. I still feel dreadful and tell everyone not to ever consider them."

- BambieO mumsnet.com



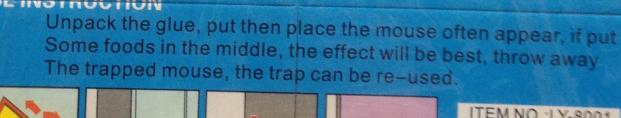
INHUMANE

The way in which the traps work is very simple: they are laid on the floor with a tasty treat such as peanut butter or chocolate placed in the middle to attract the rat or mouse, who will scurry on to the trap and become attached to it by the paws, part of the body, or the full body. The glue is so strong there is little hope of escape, or at least escape without lifethreatening injury. HSI UK has studied a large number of YouTube videos posted by members of the public who have filmed rats and mice caught on glue traps and have made the following observations from the footage:

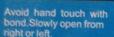
 Trapped animals will try to drag themselves out of the glue and exhibit jerky movements combined with laboured breathing, indicating fear and suffering.

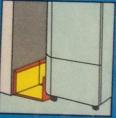
- They frequently end up collapsing, with legs splayed or twisted.
- The more they struggle, the more embedded they become and as they fight to free themselves, they may vocalize in pain and panic.
- Given the fragility of the rodent skeleton, it is highly likely that in many instances animals break and dislocate bones. Fur can also be pulled out and skin torn.
- Animals also get the glue in their mouths and noses, causing bleeding and likely eventual suffocation, and animals with glue in their eyes will likely experience pain and vision loss.

Internet discussion boards indicate that some animals gnaw through their own limbs or rip their feet off in a desperate attempt to escape.









Fold into "U" in crease to place.



The mice have a habit in by passing corner, so put the board near corner.



Using it to hold holes form.



MADE IN CHINA

PERIOD OF VALIDITY: THREE YEAR
MANUFACTURE DATE

KILL RAT & MOUSE WITHOUT POISONS

Glue traps: the public user journey

A YouGov poll⁶ commissioned in June 2015 for HSI UK showed that almost a quarter of the population (23 per cent) has used, or would consider using, rodent glue traps. They are sold widely in stores throughout the UK. In a snapshot survey, HSI UK called 50 randomly chosen hardware and convenience stores located across 10 towns and cities throughout the UK and found that 46 per cent stock glue traps. Extrapolating these indicative figures nationally, we get a very broad indication that glue traps are sold in thousands of stores across the UK.

The instructions on the back of glue trap packets describe how and where the traps should be put down, but give very brief, if any, direction on what to do with animals who are caught. This presents two significant welfare problems:

Problem 1: Duration of suffering

Whilst some members of the public may be concerned enough to check traps frequently, it is safe to assume that others will not. Animals left stuck to traps that go unchecked for hours, or even days, face extreme suffering, both psychological and physical, and the likelihood of a slow, agonising death. This typically comes from a combination of shock, starvation, dehydration and exhaustion⁷. One laboratory

experiment looking into how long it took rodents caught on glue traps to die found that 85 per cent of mice were still alive a day later.8

Problem 2: Humaneness of death

Many people, it seems, do not realise that the glue trap is not designed to kill its victim outright so they are shocked to find a terrified living rat or mouse attached to it. These animals are then at the mercy of the person who laid the trap, who may experience any one of a range of reactions to the plight of a rodent struggling for his or her life, including fear, compassion, or indifference.

Of the brands on sale in high street stores in the UK, *The Big Cheese, Glue Terminator* and *Tomcat* are the only ones that instruct the purchaser to kill captured animals 'quickly and humanely'. However, neither offers specific information on how to do this. Two manufacturers, *Expert Brand* and *Henco*, tell purchasers to throw away trapped mice.

The only specific instructions on how to kill rodents 'humanely' appear in the Pest Management Alliance's Code of Best Practice, which states it should be done by: 'Placing the glue board in a clear plastic bag and dealing the rodent a sharp blow to the head with a blunt instrument.'

"A lot of people have no clue about the glue traps. They assume they sell them, so they must be ok. I only heard after a friend used one only to come back to it to find nothing but feet. It broke her heart."

- ShellBeau mumsnet.com

"{My husband} found three mice last winter stuck to one and told me never ever again to use it. He said they had started to bite their legs off to get free."

- dizzydo, mumsnet.com

"Um, after they get stuck you will know about it since there is a lot of squealing... We live in the country and it was the middle of the night when it got caught on the glue so we put it outside and a fox or cat must have got him because he had been mostly eaten by the morning."

- PrincessGoodLife mumsnet.com

⁶³ ibid

⁷ Mason, G. & Littin, K. E. 2003 The Humaneness Of Rodent Pest Control Animal Welfare 12, 1–37.

⁸ Frantz, S. C. & Padula, C. M. (Ed. by D. E. Kaukeinen), 1983. A laboratory Test Method for Evaluating The Efficacy of Glueboards for Trapping House Mice. Vertebrate Pest Control and Management Materials: Fourth Symposium: 209–225.



But it is extremely unlikely that ordinary members of the public will have read up on or been instructed in humane despatch of a trapped animal. Even if they choose this course of action by themselves, killing an animal with a blow to the head requires a firm resolve and not being frightened or squeamish.

We believe it likely that many people will find themselves unable, or fail, to kill rats and mice stuck to glue traps in a quick and clean manner, and a considerable body of anecdotal evidence from glue trap users posting on the internet supports this.

Some forum users appear to believe that drowning is one of the 'kindest' ways of killing an animal stuck to a glue trap. However, one study found that the average time it takes a rat to drown is 2.6 minutes⁹. A paper looking into the humaneness of various pest control methods produced by respected body the Universities Federation for Animal Welfare (UFAW), Guiding Principles in the Humane Control of Rats and Mice¹⁰, concluded 'drowning is not a humane method and should be avoided'.

There are also, unfortunately, plenty of uncompassionate individuals who appear to take pleasure from their victim's suffering. For example, forum posts in which people discuss their use of glue traps reveal accounts of traps with live animals attached being thrown into fires¹¹.

Instructions on packaging from glue traps found for sale in UK stores:

- Expert Catch large glue traps: 'Discard mouse with trap.'
- Expert Catch mouse & rat glue: 'Throw away the trapped mouse, the trap can be reused.'
- Glue Terminator mouse glue traps: 'Despatch [sic] captured mice quickly and humanely.'
- **Henco**: 'Once the mouse is trapped, dispose of it.'
- The Big Cheese: 'Dispatch captured rodents quickly and humanely.'
- **Tomcat**: 'Dispatch captured mice quickly and humanely.'

"When the animal steps onto the glue board they get stuck and cannot pull free. They usually will not guit, however, and many times will pull a leg, tail or section of the body apart in an effort to escape. This can cause a mess so be careful to use these devices where young children are not likely to stumble upon such a mess. The author has encountered several mice and rats caught on these traps which were screaming! It was loud, almost humanlike."12 - Dr Richard Kaae, Professor of Pest Management, Cal Poly Pomona

⁹ Yamamoto, K., Yamamoto, Y. & Kikuchi, H, 1983. The effects of drowning media on the lung water content: an experimental study on rats. International Journal of Legal Medicine, 90: 1-6.

¹⁰ 'Guiding principles in the Humane Control of Rats and Mice', Universities Federation for Animal Welfare, 2008.

¹¹ http://www.nbcnews.com/id/10766971/ns/us_news-weird_news/t/mouse-roared-flames-or-did-it/

¹² Dr. Richard Kaae, 2010. Commensal Rodents-Rats and Mice. Expert Witness – Entomology. http://insectexpertphd.com/rats.aspx



GLUE TRAPS AND CURRENT UK LAW

The Wild Mammals (Protection) Act (1996)¹³ refers to animals 'taken in the course of pest control activity' and states that if a person kills such an animal, he/she shall not be guilty of an offence providing the killing is 'in a reasonably swift and humane manner'.

Furthermore, an animal is protected under the Animal Welfare Act (2006)¹⁴ if s/he is 'under the control of man whether on a permanent or temporary basis'. Animals stuck to glue traps are, therefore, protected. This means that the person who put the trap down is responsible for acting in a way so as to prevent the animal from unnecessary suffering. Failure to do so may put them at risk of committing an offence under Section 4 of the Act¹⁵, which states:

- (1) A person commits an offence if:
 - (a) an act of his, or a failure of his to act, causes an animal to suffer,
 - (b) he knew, or ought reasonably to have known, that the act, or failure to act, would have that effect or be likely to do so,
 - (c) the animal is a protected animal, and
 - (d) the suffering is unnecessary.

In 2010, a legal precedent was set when Raymond Elliot was prosecuted by the RSPCA. He was charged under the Animal Welfare Act with causing unnecessary suffering

after he drowned a squirrel in a water butt, and was subsequently convicted, receiving a six-month suspended sentence and a fine of £1,547¹⁶.

The Pests Act (1954)¹⁷ focuses predominantly on rabbits and the approval of spring traps for larger 'pests'. The Act's subsequent qualification under the Small Ground Vermin Traps Order (1958)¹⁸ exempts the need for government approval for break-back traps for 'small ground vermin' and spring traps for moles in their runs. No provisions or approval requirements are made for any type of adhesive-based traps.

Several pieces of wildlife legislation, including the Pests Act (1954), have been under review by the Law Commission, which was tasked in 2011 by the Department for Environment, Food and Rural Affairs with 'putting together a modern, consistent and simple to understand regulatory framework.' The department recognized that 'it is not always clear what levels of protection apply to individual species - by reforming the legislative framework we are seeking to improve clarity and consistency.' The Commission's review is scheduled for publication in late 2015, with the possibility of a new Wildlife Bill being put before Parliament in 2016.

^{13 &#}x27;Wild Mammals (Protection) Act', 1996, UK Legislation (1996)

¹⁴ 'Animal Welfare Act 2006', UK Legislation (2006), Cht45 S2.

¹⁵ 'Animal Welfare Act 2006', UK Legislation (2006). ch45 S4(1a).

 $^{^{\}rm 16}\,\text{Louise}$ Gray, 'Hundreds face fines for killing squirrels', Telegraph, 19 July 2010

^{17 &#}x27;Pests Act 1954', UK legislation (1954)

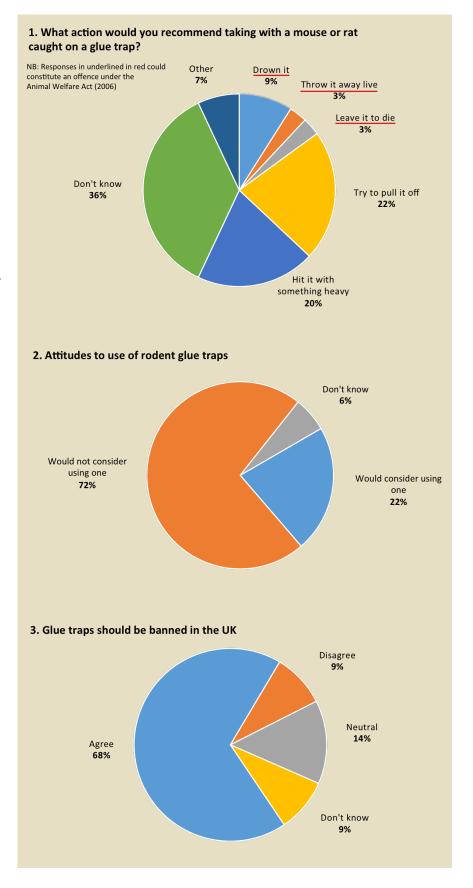
¹⁸ 'The Small Ground Vermin Traps Order 1958', UK legislation (1958)

¹⁹ Defra Wildlife Law consultation, 2012 (https://www.gov.uk/government/consultations/wildlife-law)

UK PUBLIC USE OF AND ATTITUDES TO GLUE TRAPS

The commonplace nationwide sale, and willingness of almost a quarter of the UK population to use glue traps, indicates that they are a widely used product on the market. But are people aware of the legal implications of mis-use of the traps? Our opinion poll results suggest not. Just over half of the respondents said either they would not know what to do with a trapped animal or would recommend an action that risked committing an offence under the Animal Welfare Act (2006). This included nine per cent who suggested drowning. Only twenty per cent would recommend killing the animal by the method recommended by the pest control industry's Code of Best Practice: hitting him/her with a heavy object such as a brick or hammer. Other options chosen by members of the public, including leaving the animal to die on the trap from starvation, injury or dehydration, or throwing the trap away with the live animal still attached, are actions that would clearly constitute causing 'unnecessary suffering', and could therefore put the person at risk of prosecution.

Just over one in five respondents said they would recommend attempting to pull the animal off the trap and release him/her away from the house. In reality, however, due to the strength of the glue it is very difficult to remove an animal from a trap without causing further life-threatening stress, loss of limbs or fur, and injury to the animal.





INDISCRIMINATE & INDEFENSIBLE

A secondary issue of concern is the nonselective nature of glue traps. Any animal who steps on to or brushes up against one will stick to it. It is an offence under the Wildlife and Countryside Act (1981)²⁰ to set glue boards in a place where wild birds could be caught. However, there are many recorded instances of birds getting stuck who have been fortunate enough to be found by a member of the public and taken to a vet or wildlife rescue. There are also numerous online reports of cats becoming adhered. On one occasion, the media reported that a grass snake had been caught and went on to die from the injuries sustained²¹. It is wholly probable that this is the tip of the iceberg and that other incidences of nontarget animals getting stuck will have gone undiscovered and undocumented.

Political and industry support for a ban

The sale and use of glue traps has long been a contentious issue and there is already both political and industry support for a ban on their use by non-trained members of the public. In 2008, Sir Alan Meale, MP for Mansfield, tabled EDM 1833²² calling for a UK ban.

The pest control industry, represented in the UK by the Pest Management Alliance, backed the call for a ban on the sale of glue traps to the public, but unsurprisingly sought to defend its own use of them.

Subsequent to EDM 1833 (2008-2009 session), the Pest Management Alliance²³ produced its Code of Best Practice Humane Use Rodent Glue Boards, in which it states:

'Although 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... all other options for rodent control must be considered before glue boards are used...The humane use of glue boards is the legal responsibility of the pest controller and cannot be delegated to untrained people'.

"A very distressed lady brought a poor little Robin in to help get him free from a glue trap. He was well and truly stuck fast, and this is often a very serious problem for us, as the feathers are so severely damaged the bird must undergo a lot of treatments to remove the glue. These traps are a very inhumane way to catch small rodents, and a danger to other animals, too." - Simon Cowell MBE, Director, Wildlife Aid (as seen on TV's WildlifeSOS)

"This kitten has suffered as a result of the irresponsible and inhumane use of traps. Like snares and most pest control equipment, glue traps are indiscriminate. We are regularly alerted to incidents of non-target species being caught in snares and traps. Such traps are easily purchased but as with all traps can cause suffering and pain to animals."

- RSPCA Animal Welfare Officer Boris Lasserre (Daily Mail 03/08/2010)

²⁰ Wildlife and Countryside Act 1981, UK legislation (1981)

²¹ Emily Allen, 'Robin Left for Dead and Almost Featherless \during Struggle to Escape Glue Trap for Rats...But Manages to Survive', Daily Mail, 19 July 2012

²² http://www.parliament.uk/edm/2008-09/1833

^{23 2} ibid



Voluntary prohibition by retailers

Several well-known hardware and DIY chains, including Homebase and The Range, have adopted policies against the sale of glue traps, on grounds of poor welfare for the target species. From telephone and face-to-face research, we have found that several other high street retailers, including 99p Stores, Poundland, B&Q and Wyevale Garden Centres, do not appear to stock them despite offering a selection of other rodent-killing products, however they did not respond to our requests for official confirmation and a comment.

International precedents

Several other countries have already acted to ban the public sale and use of glue traps on animal welfare grounds. In Ireland, they are banned under the Wildlife Act, 1976²⁴, which forbids the use of certain traps 'except where authorised in exceptional circumstances'. To date, no authorisations have been granted and since 2008 there have been eight prosecutions for the illegal possession of glue traps.

Commencing January 1, 2015, New Zealand outlawed the purchase and use of glue traps by members of the public under the Animal Welfare (Glueboard Traps) Order 2009. The Australian state of Victoria has also regulated their sale and use in the same way.

"There are welfare concerns with glueboard traps.... Attitudes about animal welfare continually evolve, and it's important that we keep pace with changes in our society, as well as scientific knowledge, good practice and available technology. Pest control operators must make every reasonable effort to find humane alternatives [to glue traps]. - Matthew Stone, Director **Animal and Animal** Products, New Zealand Ministry for Primary

Industries 12/17/14

- "I believe that many retailers and members of the public may be unaware that to sell or to possess an unauthorised trap is an offence under Irish law", said the Minister. "My Department is actively pursuing the sale of these illegal traps and glues. Prosecutions have been and will be taken where breaches of the law are detected.' - Mr Dick Roche, T.D., Minister for the Environment, Heritage and Local Government 03/04/06
- "We don't market any of these as we deem them to be entirely unsuitable and inhumane for use by amateurs." - Email from
- Email from Matthew Lambourne, Homebase, 13/07/2015
- "It is obvious that these products [glue traps] are inhumane for the Rat / Mouse (sic) and not particularly desirable for most consumers. As a buyer I made an instant decision not to stock these products..."
 Email from Simon McDaniel, Garden Buyer, The Range, 15/7/2015



HUMANE, NON-LETHAL SOLUTIONS

The basic need to find sustenance and shelter drives rats and mice into close proximity with human beings. Undeniably, their presence can at times cause problems. Whilst it is unrealistic to expect that people universally are going to warmly welcome rodents or other so-called 'pests' such as moles into their home or garden, the default solution should not be controls that cause suffering or death. Instead, HSI UK advocates the adoption of humane methods of deterrence and environmentally-sound approaches to modifying and managing the habitat conditions that sustain problematic animal populations.

In addition to causing loss of life and suffering, lethal methods of control are also treating the symptom rather than the cause and can therefore be a futile endeavour. Unless the conditions that encouraged the animals to take up residence in the first place are addressed, it is highly likely that, over time, others will simply move into the vacated territory.

Deterrence and eviction

Mice like to live indoors and can enter a home by squeezing through very small spaces, for example air bricks/vents, gaps around gas and water pipes, drain pipes, and cable holes. Rats prefer to be outside, although they too will sometimes come indoors if food is readily available. The crumbs in our kitchen, meat and kibble that we leave out for our companion animals, left-overs we throw way in our rubbish and compost bins, and the tasty treats we put out for hedgehogs, foxes and birds all provide rats and mice with a tempting buffet. The key to co-existing with these canny little creatures is to remove their food source and follow the adage that prevention is better than cure. If they do set up home inside your house

or garden there are steps that can be taken to encourage them to relocate:

- Keep kitchens clean and all food in sealed glass or metal containers.
- Rodents have been found to avoid the smell of peppermint, spearmint or eucalyptus. Soak cotton wool balls in one of these oils and leave along work surfaces, underneath units and by entry points.
- Grow mint, spearmint and/or citronella plants in the garden.
- Stop feeding wild birds until the rats or mice have gone.
- If planning to resume bird feeding, do not throw food on the ground, put it in feeders with trays underneath. Put food out little and often and do not leave it out overnight.
- Use 'mouse-mesh' to cover air-vents and air-bricks and wire/copper wool, or rapidly hardening sealer to block gaps around pipes in outside walls. Put draught excluders under outside doors to ensure that gaps are no more than 5mm.
- Make your garden less hospitable by keeping grass short, thinning out shrubs, and removing cover such as piles of wood and old junk.
- Disrupt their habitat by digging up rat runs and putting obstacles such as rocks and leaves in entrance/exit points (without blocking them up completely).
- Non-toxic animal-repelling products from garden centres and DIY shops can be scattered or sprayed around sheds (but not if you have a cat or dot). Rags soaked in them can be left in the corner of basements and lofts

While some users report success, ultrasonic plug-in devices are not widely regarded as reliable.



LIVE CAPTURE & RELEASE

Live capture and release should only be considered a last resort. Unfortunately, unless mice leave of their own volition, even with the best of intentions it is very difficult to deal with them in a way that doesn't involve some risk for them or their offspring. Catching animals and releasing them away from the home should only be attempted if they have not been persuaded to leave of their own accord. Whilst it is undoubtedly preferable to a slow and certain death from poisoning, if they have been inside for generations there is no guarantee that indoor mice will survive outside in unfamiliar territory, and their chances will be reduced further by cold weather. They may also leave behind young, dependent animals in the nest, who will perish. If a live trap is used, it must be checked first thing in the

morning, last thing at night and at least once more during the day, and the animal must be released as soon as possible.

After animals have been evicted or captured and released, it is vital that they are prevented from re-entering. Determining points of entry from outside to in is especially important.

We provide species-specific information on how to co-exist with a range of wild animals at *humanesociety.org/animals/wild_neighbors/*.



A NOTE ON LETHAL CONTROLS (OTHER THAN GLUE TRAPS)

The default option for dealing with rodents tends to be the use of traps and poisons, however these are neither humane nor effective in the long-term. Without a diligent effort to tackle the cause of the problem and prevent the recurrence of it through habitat modification, sanitation, and exclusion, there can be no permanent solution to mouse and rat infestations. Of the two main types of lethal methods available for public purchase and use – poisons and snap traps – evidence suggests that the traditional snap trap has the potential to be the least inhumane.

However, HSI UK is concerned that, since the current law exempts break-back traps (AKA 'snap-traps') for mice and rats, and all mole traps, from being tested and approved by the UK government's Animal and Plant Health Authority (APHA)²⁵, there are a range of poorly designed and made snap traps currently for sale on the UK market²⁶. For this reason we are also calling on the Government to properly regulate all traps for mice, rats and moles, and remove from the market all of those which fail to properly protect animal welfare.

Poisons - Second Generation Anti-coagulant Rodenticides (SGARs) - cause unacceptably slow and painful deaths lasting between 3-14 days, during which the animals suffer sickness, paralysis, and pain from internal bleeding. These highly toxic biocides also carry a risk of secondary poisoning to wildlife – foxes, owls and hawks – that eat poisoned mice and rats; the European Parliament has even considered a ban on their use²⁷.

²⁵ Currently, under the Pests Act, 1954 (and subsequent qualification by the Small Ground Vermin Traps Order, 1958), break-back traps for 'small ground vermin' and spring traps for moles in their runs, are exempted from approval requirement.

²⁶ Baker, S. E., Ellwood, S.A., Tagarielli, V.L., McDonald, D.W., 2012. Mechanical performance of rat, mouse and mole spring traps and possible implications for welfare performance. PLoS ONE 7(6): e39334

²⁷ http://www.farminguk.com/News/MEP-hails-victory-on-rat-poisons_18472.html



CONCLUSION & RECOMMENDATIONS

Glue traps are inhumane, indiscriminate, and indefensible. Rats and mice may never be the most popular of creatures, but even those people who feel resolutely negatively towards them should agree that no sentient animal – cat, dog, rabbit, rat or mouse – should be knowingly subjected to fear, suffering and a prolonged and agonising death. 68 per cent of British people either agree or strongly agree that they should be banned, and only nine per cent disagree that a ban should be enacted.

Recommendations for action by the UK government:

- Legislate immediately to prohibit the purchase and use of glue traps by members of the public.
- Regulate the use of glue traps by professional pest controllers (to include permissibility in only certain specified circumstances, and mandatory checking intervals), and require industry reporting on their use.

- Critically examine existing deficiencies and inconsistencies in UK laws relating to the wider welfare management of small mammals termed 'pests'. Specifically, on the issue of traps, we encourage the government to:
 - a. change the law to require that all vertebrate traps require welfare approval by the Animal and Plant Health Authority, drawing to the greatest extent possible on existing research, and scenario and simulation modeling;
 - b. require that approval of all traps (lethal and live capture) is accompanied by, and conditional on adherence to, directions on: species and trap specific inspection intervals; mandatory training and /or professional qualification requirements for users and; the provision of appropriate food and water in the case of live-capture traps.

"Sticky boards... seem to have the same major welfare costs as leghold traps: instant and prolonged distress and trauma, followed by dehydration, hunger and sometimes selfmutilation when animals are held trapped for long periods." 28



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