

# **SCOTTISH ANIMAL WELFARE COMMISSION**

**Report on the use of rodent glue traps in Scotland**

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## **Introduction**

1. The Scottish Animal Welfare Commission (SAWC) was established by the Scottish Animal Welfare Commission Regulations 2020, made under section 36 of the Animal Health and Welfare (Scotland) Act 2006. The function of providing advice on the protection of wildlife under section 23 of the Wildlife and Countryside Act 1981 has been assigned by Ministerial declaration.

Further information on the Commission, including reports and minutes of previous meetings, is published when available; see <https://www.gov.scot/groups/scottish-animal-welfare-commission/>

2. SAWC's terms of reference are to focus on the welfare of wild and companion animals in Scotland while also providing scientific and ethical advice to the Scottish Government. The Commission will only consider areas that are within the normal current remit of the UK Animal Welfare Committee and the UK Zoo Expert Committee where these relate to the overall responsibility to consider the welfare needs of sentient animals in all areas of Scottish Government policy or at the specific request of the Minister. The Commission will not consider matters that are reserved to the UK Government, including the welfare of animals used in scientific procedures.

The Commission will provide written reports and opinions to Scottish Ministers giving practical recommendations based on scientific evidence and ethical considerations on the welfare of sentient animals in Scotland, and the impact of policy on welfare.

## Scope

This report considers the animal welfare issues surrounding the use of glue traps to control rodents in Scotland and makes recommendations regarding potential regulation.

## Background

Glue traps are available very cheaply at retail outlets and from online sources including specialist suppliers and general sites such as eBay, sometimes accompanied by graphic images of traps in operation (eBay, 2020). However, concerns have been expressed about the humaneness of glue traps for rodents and non-target species, both by animal welfare groups and by individuals petitioning the Scottish Parliament.

Campaigns by animal welfare organisations (such as Humane Society International UK (HSI UK) and RSPCA) have resulted in a number of wholesalers and retailers in the UK withdrawing them from sale but many others continue to sell them. Pest management industry representative bodies such as the British Pest Control Association support the restriction of glue traps so that they can only be purchased and used by trained professionals (PMA, 2017).

These issues were raised in a petition to the Scottish Parliament in 2017. Petition PE01671: Sale and Use of Glue Traps (Scottish Parliament 2017) was considered seven times by the Public Petitions Committee, taking evidence from animal welfare and industry groups, the Cabinet Secretary for the Environment, Climate Change and Land Reform, Roseanna Cunningham MSP, and Scottish Government officials. On 26 April 2018, the Cabinet Secretary indicated:

*“At present, the preferred option would be to allow the continued use of glue traps but by professional pest controllers only, which would mean their adhering to a code of practice.*

*Of the three options, we think that that is the one that we could progress in a reasonable period of time, which would be effective and which would not create difficulty if, in the future, we wanted to move to the higher level of control. In that sense, we are ruling out the idea of no further regulation. We think that we need to look at that.*

*In a sense, the production of a code of practice for general use could be part of that first option and could be put into practice quite quickly. We are back to differing timescales here for Government action, but we think that there are limitations to the approach, if you are talking about a code of practice across the board for the general public. That would be better than nothing, but we do not feel that it would actually take us very far forward.*

*At the moment, our view is that the option of a total ban would be difficult because there are certain situations—for example, where food is prepared—in which there*

*may not be practical alternatives to what is being used currently. We need to think about that. I would not rule out looking at a ban further down the line, if the actions that we take as a preferred option do not produce the expected results.”*

On 23 March 2020, the Scottish Government wrote to the Public Petitions Committee that its preference remained to introduce legislation to ban the sale and use of glue traps except by professional pest controllers. In the absence of parliamentary time for primary legislation,

*“... we could introduce a code of practice that was explicit to Scotland in the meantime.*

*As you may be aware, the Scottish Government has now established the Scottish Animal Welfare Commission which will focus on protecting wild and companion animals while also providing scientific and ethical advice to government. On this basis, we suggest that the Scottish Government raises the issue of glue traps with them and seek their input into a code of practice specifically for the use of glue traps in Scotland.”*

At the Commission’s inaugural meeting on 18 March 2020, it was agreed that a SAWC work group would provide an opinion on the use and impact of these forms of wildlife management. The Commission agreed that this might include, but not be restricted to, suggesting future regulations and control such as restricting use to professional pest managers only or others.

The Commission’s work group has focused on examination of the welfare issues surrounding the use of glue traps in Scotland, and possible regulatory approaches. It has not considered the detail of any statutory or voluntary code, on the basis that a decision on the status requires to be made first, based on sound evidence of the type that has been sought in this initial exercise. A code that forms part of a statutory licensing regime would inevitably be different from a voluntary code promoted by a self-regulating industry.

## **Definition of glue traps**

Glue traps, sometimes referred to as sticky boards or glue boards, are used to control unwanted species, typically rats or mice. The traps are generally used indoors, and normally consist of a piece of cardboard, plastic or thin wood covered with a very strong, non-setting adhesive. They may either be flat, or folded to form a tunnel, and then positioned in places that rodents are believed to frequent (such as a mouse running along a wall). When the animal touches the glue, it becomes stuck and when it attempts to free itself more of its limbs and body will become stuck. The card can then be retrieved and the animal dispatched. A similar technique (bird lime) was formerly used for trapping birds but is now prohibited under the Wildlife and Countryside Act 1981 (WCA).

## **Evidence gathered**

In August 2020, the Commission issued a call for views to experts and stakeholders including scientific advisors to government in Scotland and overseas, pest control industry representatives, and animal welfare organisations. The Commission thanks all those who responded with very helpful submissions. A list of respondents is at Appendix II and the full submissions may be made available on application to the SAWC Secretariat. The Commission also considered the submissions to the Public Petitions Committee.

## **Ethical analysis and critical issues**

Broadly speaking, the issues raised in evidence received by the Commission fell into the following categories: (i) reasons for using glue traps; (ii) animal welfare impacts of glue traps on captured animals, including methods of dispatch; (iii) non-target captures; (iv) alternative rodent control methods; (v) ethical considerations; and (vi) legislation in other countries.

### ***Reasons for using glue traps***

Most respondents acknowledged that measures were necessary to control or eradicate rodent incursions, particularly to food preparation or medical facilities. The British Pest Control Association (BPCA) raised public health concerns:

*“Rodents carry and transmit pathogenic microorganisms (and therefore disease). Failure to act quickly in a high-risk environment can result in sickness, distress and death.”*

The Royal Environmental Health Institute of Scotland (REHIS), while recognising the need for control of the use of glue boards in pest control, believed that there were *“cases of last resort, where other control measures have failed and there is no alternative to the use of glue boards.”*

Science and Advice for Scottish Agriculture (SASA) commented:

*“It is difficult to know where they are ‘essential’, however it is worth considering that rather than being a specific location it might be argued that these traps may be necessary at any location where rats need to be removed quickly and where preferred alternatives are failing to work or are inappropriate.*

*The kinds of places where rodents would need to be removed quickly might be hospitals and other health care facilities, food manufacturing, pharmaceutical manufacturing and food preparation, where there are potentially serious consequences from contamination. It might also be imperative to quickly remove them from anywhere with critical infrastructure involving wiring and electrics where there is either a danger of gnawing damage or of equipment shorting and, in extremis, fire (perhaps a data centre or a power station control room?)”*

Some animal welfare stakeholders accepted that there were currently some practical reasons for opting to use glue traps – for example, the Universities Federation for Animal Welfare (UFAW) stated:

*“Glue traps offer some advantages over other methods of lethal rodent control; they require little technical skill to use (although skill will be required to humanely kill a trapped animal), can fit where other devices cannot, are free from toxic substances and may be used as a method of demonstrating the presence of or assessing the extent of an infestation.”*

All stakeholders acknowledged, however, that glue traps cause animals to suffer. Some believed this was unavoidable due to the urgent necessity of controlling rodents in certain situations. Others maintained that glue traps could not be justified under any circumstances and that alternative methods were always to be preferred.

#### Conclusion – reasons for using glue traps

There are public health concerns in certain high-risk situations that clearly require effective and rapid pest control in order to reduce the spread of disease. However, the Commission is not convinced that evidence exists supporting the view that glue traps are genuinely the only method of last resort.

#### **Animal welfare issues**

For the pest control industry, the BPCA acknowledged that glue traps could cause animal suffering and believed they should only be used as a last resort by commercial operators such as BPCA members, in accordance with the Pest Management Alliance (PMA) Code of Best Practice for the Humane Use of Glue Traps (PMA, 2017a).

HSI UK described extreme suffering in individual animals, noting that the number of animals affected is not known:

*“Every year across Scotland and the rest of the UK, glue traps, widely available for as little as 99p, cause untold numbers of trapped rodents to suffer horrific injuries and an agonising and protracted death from starvation, dehydration, suffocation, exhaustion or stress. Animals caught on these devices are known to break and dislocate limbs, tear off fur and skin, and even attempt to gnaw off limbs in order to free themselves.”*

Two scientific papers were referenced by several of the animal welfare advocacy groups to substantiate their observations. Fenwick (Fenwick, 2013) reviewed three experiments noting physical observations of rodents caught in a glue trap. All three experiments found that rodents became fully entangled in the glue, with feet, body and head eventually becoming stuck. It was also reported that the animals' mouths became glued shut as a result of trying to chew themselves free from the trap. Two of the experiments observed the animals repeatedly defecating and urinating while one reported that the animals had eye damage and, where fur was torn away, raw skin patches.

Mason and Littin (Mason and Littin, 2003) stated that glue traps:

*“...seem to have the same major welfare costs as leghold traps: instant and prolonged distress and trauma, followed by dehydration, hunger and sometimes self-mutilation when animals are held trapped for long periods.”*

UFAW concluded:

*“UFAW’s opinion is that the severe welfare impacts of glue traps both on target and non-target species rarely if ever outweigh their benefits and therefore that their use should not be permitted for the control of any vertebrate species. Unlike snap-traps where death is rapid if the trap functions correctly, immediate, and long-lasting severe suffering is virtually guaranteed with glue traps and therefore snap-traps should be considered a more humane alternative method where rodents must be caught and killed.”*

Glue traps are restraining traps, meaning that users should expect to find the trapped animal alive and be prepared to dispatch it quickly and humanely. However, some respondents pointed out that advertising and packaging do not give any advice on the best method, and nor does the industry code which refers to suitable training. A blow to the head is often intended to produce instant death, but it was suggested that many people would not be able to do this effectively. Likely reasons for failure to dispatch humanely included fear, health hazards and squeamishness. HSI UK commented:

*“Since many glue traps are supplied without adequate instructions to inspect traps frequently, users may be unable, or unwilling, to check them within appropriate intervals. Trapped animals may therefore experience prolonged and unnecessary suffering, taking hours or even days to die.”*

HSI continued:

*“A UK YouGov opinion poll commissioned by HSI UK in 2015 found that over half of respondents said they either would not know what to do with a trapped animal or would recommend an action that risked committing an offence under Section 19 of the Animal Health and Welfare (Scotland) Act. This included 9% who suggested drowning and 6% who stated that they would leave the animal to die on the trap or would throw the trap away with the live animal still attached.”*

Many of the same issues were raised by the Wild Animal Welfare Committee (WAWC) and summarised as:

- *Mental distress / physical injury when struggling to escape, drowning in glue or when being killed: these aspects are indefensible yet unavoidable.*
- *Inadequate frequency of trap inspection (including possible starvation): glue traps cannot be rendered humane by setting a minimum frequency of inspection.*
- *Inability / reluctance to kill a trapped animal: this means that people may not check glue boards that they have deployed for days or weeks. We are aware of anecdotal reports of live animals attached to glue traps simply being thrown into waste bins.*
- *Indiscriminate capture: while covers or tunnels could be used, this doesn't obviate the fact that glue boards are indiscriminate by their very nature.*



- *Trapped animal being attacked or becoming prey to carnivores: this would compound the mental distress and physical injury of the trapped animal and we consider this doubly indefensible.*
- *Standards of use - public vs professional: while it has been mooted that glue trap use should be restricted to professional operatives, it is hard to imagine how a professional standard can be set given the points above and recognising that the traps are inherently inhumane no matter who sets them.*
- *Ability for anyone to obtain traps over the internet: See above. If glue traps are proscribed it will be important to ensure that individuals are unable to obtain them from any source.*

The National Animal Welfare Advisory Committee (NAWAC) of New Zealand stated that it had recommended regulatory measures for glue traps in New Zealand because of:

- *the distress exhibited by rodents caught by glueboard traps;*
- *the likelihood of an extended period of time between capture and death;*
- *the inhumane manner of death;*
- *the possibility of inhumane disposal of live rodents when traps are inspected (animals could be drowned, incinerated or simply thrown into rubbish bins); and*
- *the existence of practical and affordable alternative methods of rodent control.*

SASA described the currently permitted interval of 24 hours between inspections as “*certainly too long*”, but suggested that frequency of inspections involved a balance between welfare considerations and practicality:

*“At the very least the industry (PMA) recommendation of every twelve hours should be the bare minimum for consideration but given the likely stress that a captured animal is under I personally consider that is too long and would feel uncomfortable operating such a trap to that timescale. There are likely to be practical problems with reducing the time between checks significantly further as there could be access issues to some premises that are closed at night and it could be difficult for some contractors (in particular sole operators) to undertake round the clock visits every few hours; although that might be viewed as a reason not to glue trap rather than to have long periods between checks.*”

*...it should be as short a time as possible, but the question is what is possible and still practical. If the checking period was half the industry recommended timescale, i.e. 6 hrs then I can see that starts to create issues for some small contractors and I still don't think I personally would be comfortable with knowing an animal I was responsible for was stuck fast in a glue trap for 5 ½ hrs given the stress and discomfort they would likely be under.”*

SASA suggested that inspection times could be covered under any proposed licensing scheme:

*“...while more regular checks pose significant difficulties, they are not insurmountable. Current practices of training one or more site representatives to check traps could be a solution in some circumstances and within a licensing system*

*it could be a condition of the licence that those persons are named and trained appropriately.”*

SASA also pointed to the use of remote trap alerts as a potential solution under licensing.

OneKind quoted comments seen on the Mumsnet platform, including:

- *I had a bucket of water outside the back door to drown the mice in.*
- *I suffocated them by placing the trap and mouse in a plastic food bag and tying it up tight.*

The British Columbia Society for the Prevention of Cruelty to Animals (BC SPCA) recommended adopting scientifically based criteria to measure humaneness, such as the criteria it has developed (using North American reference documents). To be considered scientifically humane according to these criteria, a lethal wildlife control method would cause:

- 1) *Short duration to irreversible unconsciousness and/or death (approximately < 1 minute)*
- 2) *Short duration of physical injury and/or pain (approximately < 1 minute)*
- 3) *Low severity of physical injury and/or pain (physical injury approximately ≤ 10 points on ISO Trauma scale (Proulx 1999))*
- 4) *Short duration of distress*
- 5) *Low severity of distress*
- 6) *High reliability of method when used by trained and competent individuals*
- 7) *Minimal impact on non-target animals*
- 8) *Accessibility of animal for confirmation of irreversible unconsciousness or death.*

#### Conclusion – animal welfare issues

The Commission noted unanimous recognition that glue traps cause animal suffering, with the majority of respondents indicating the likelihood that their use causes significant and potentially prolonged animal suffering to the target species. Importantly, concerns are not isolated to a particular aspect of the use of glue traps and even with optimal use (frequent checking and effective dispatch) there remains a significant animal welfare concern. It is the view of the Commission that there is no way that glue traps can be used without causing animal suffering.

#### ***Non-target captures***

These were raised by several stakeholders including HSI UK who referred to “*many instances*” of birds being trapped, as well as small mammals, reptiles and pets.

Between 2015 and 2019, the Royal Society for the Prevention of Cruelty to Animals (RSPCA), which operates in England and Wales, received 243 reports of glue trap incidents of which over 73% involved pets and non-target wildlife (RSPCA, 2020).

The RSPCA stated on its website:

*“The figures from the last five years show that we received 13 reports in which cats had become stuck to a glue trap and seven incidents involving exotic pet snakes, as well as other cases involving dogs, pigeons, owls, ferrets and even a parrot. Victims of these traps have suffered horrendous injuries, many of which have been fatal.”*

#### Conclusion – non-target captures

There is an undeniable risk of capture of non-target species. However, without knowing how frequently glue traps are used it is not possible to quantify that risk. Information on how ‘indiscriminate’ other forms of control are in comparison to glue traps would also be useful – in relation to rodenticides in particular.

#### **Alternative methods**

The BPCA listed a “risk hierarchy” of methods followed by its members, ranging from proofing of premises to exclude rats and mice, through traps and rodenticides, to glue boards, which are described as the last resort. While it did not provide scientific or statistical references, the BPCA said that there were circumstances where there was no alternative to the use of glue traps by professionals.

Conversely, Humane Wildlife Solutions, a Scottish-based company, stressed that it used only non-lethal methods such as repelling and deterring rodents.

The BC SPCA stated that, while last-resort use of glue traps by professionals in food handling facilities was currently permitted under its AnimalKind accreditation-and-referral programme, this approval was going to be removed. This, it said, was partly due to the emergence of alternatives such as captive bolt traps, snap traps wired to send text alerts when triggered, and, in some markets, ContraPest rodent birth control.

SASA advised that alternatives to be tried should include:

*“... exclusion, i.e. if the rodents are coming in and out via a particular route(s) then these should be sealed off or made impassable. The other main alternatives are traps (live and/or kill) and rodenticides.”*

However, SASA noted that there were drawbacks:

*“The first option may not be applicable and probably has to be combined with others anyway (to remove any rodents that are already inside), and the others may encounter issues such as neophobia or rodenticide resistance although these might be overcome by different trap types or lures, different rodenticide baits and/or different bait presentation. In some circumstance rodenticides may not be desirable as the animals could die out of sight and present other contamination risks as they decay and therefore might conceivably be discounted in some locations, and of course you might be dealing with a population with rodenticide resistance. Thus, any list of methods has to be flexible and allow for some to be deemed inappropriate or impractical in some situations.”*

SASA took the view that trying alternatives could build in delay in situations where it was imperative that rats be removed, and that this might be undesirable. It was not

certain that there was good experimental evidence that glue traps were “better” at catching rodents than more conventional traps, and indeed at least one scientific paper suggested that the reverse was true for mouse trapping (Corrigan, 1998). However, SASA concluded:

*“It might however be argued that depending on how critical the rodent removal is, that trying all possible methods at the same or within a short time frame might be a sensible approach.”*

OneKind recommended more research and development into the possibilities for using genuinely humane methods of deterrence, at large scale, by public bodies and businesses. The Commission is aware that research continues in these areas – for example, the Non-Chemical Alternatives for Rodent Control (NoCheRo) project on more environment-friendly alternatives to anticoagulant rodenticides.

In New Zealand, in tandem with legislation on glue traps (see below) a stakeholder group was set up to identify humane alternatives to glue board traps. A review of available methods for rodent detection and control was commissioned and published in 2015 (New Zealand Ministry of Primary Industries (2015)). This detailed report might form the basis for an up-to-date review if the Scottish Ministers decide to support restrictions on the use of glue boards. In the meantime, its summary of alternatives is useful:

**Table 1. Methods used for rodent control**

<b>Rodent control method</b>	<b>Potential replacement for glueboards</b>
Fumigation	Yes - limited applicability
Trapping: live traps	Yes - commonly
Trapping: kill traps (breakback)	Yes - commonly
Trapping: kill traps (electrocution)	Yes - limited applicability
Trapping: kill traps (CO2)	Yes – limited applicability
Poisoning: anticoagulants	Yes - where applicable
Poisoning: other toxins	Yes - where applicable
Non-toxic lethal compounds	No - evidence of efficacy lacking
Repellents: chemical	Yes - limited applicability
Repellents: ultrasonic, electromagnetic and ionic devices	No - evidence of efficacy lacking
Biological control: diseases and parasites	No
Biological control: fertility control	No

The Commission is aware that further research into different rat management methods has been undertaken in early 2021 and will be published shortly. The Commission proposes to review the outcomes of that research when available and to consider whether these affect the recommendations made in this report.

The number of Ministerial approvals to sell/use glue traps declined from 24 in 2015 to 2 in 2020 (New Zealand Ministry for Primary Industries, 2020). This decline was accompanied by a concomitant reduction in the number of glue traps sold and used

over the same period. In 2015, a total of 24,564 boards were sold under Ministerial approval compared with only 48 in 2019. NAWAC commented:

*“The commercial pest management industry appears to have adapted well to the use of alternative methods.”*

#### Conclusion – alternative methods

There are a range of pest control methods available and glue traps are often cited as only being used as a last resort in high risk (to public health) settings. The Commission concludes that it is difficult to justify the use of glue traps, except possibly in the most significantly high-risk (to public health) settings, such as hospitals. However, even in those settings the Commission cannot support the continued use of glue traps, given the very high likelihood of animal suffering. We note no evidence is provided to back up the statement that glue traps are only used as a last resort and there is a likelihood that this is not always the case with some operators. Independent expert advice should be harnessed to identify a ranking of likely suffering caused by all current methods of pest control to justify a hierarchy or cascade of future use.

#### ***Ethical considerations***

The BC SPCA referred to the capacity of target animals to suffer:

*“While rodent control may justify use of lethal methods due to concerns related to human health and safety, commensal rodents have a similar capacity for suffering as other animals, and humaneness of control methods should also be considered.”*

Their submission and those of OneKind, UFAW and the Wild Animal Welfare Committee requested the Commission to consider the desirability of an ethical approach to pest control and in particular the International Consensus Principles for Humane Wildlife Control (Dubois et al, 2017).

OneKind said:

*“If it is deemed necessary to kill or ‘manage’ wild animals, we recommend following the international consensus principles for ethical wildlife control (Dubois et al, 2017).”*

*The final of these seven principles seems particularly relevant here:*

*‘Decisions to control wildlife should be based on the specifics of the situation, not negative labels applied to the target species. When animals are labelled with terms such as ‘introduced’, ‘abundant’, and ‘pest’, broad approaches to control are sometimes advocated and little attention is paid to the specifics of the case. Wildlife control should not be undertaken just because a negatively labelled species is present.*

*...Animals assigned labels with negative connotations often receive less welfare consideration than valued species.*

*... Because vertebrate animals of similar cognitive and emotional complexity can be expected to have similar capacities for suffering, there is no reason consideration of*

*animal welfare should depend on how a species has been categorized or the potential detrimental effects of the animal's presence or behaviour.’ ”*

UFAW also discussed the ethics of all pest control:

*“The first question which should be addressed when tackling problems caused by ‘pest’ species is to ask whether control is necessary or whether prevention and deterrence will suffice. If control is required, then UFAW advises (UFAW, 2008) that those controlling rodents or other vertebrate ‘pests’ should respect their welfare by adhering to the following principles: 1) affect no more animals than necessary to achieve the aim and 2) refine control methods so as to minimise unnecessary suffering (fear and pain). Decisions to undertake control measures against wildlife should be based on ethical principles and should follow a logical decision-making process which seeks to justify the decision to control the target species and then minimise the impacts of control (Dubois et al, 2017).”*

OneKind also commented on the tendency to ascribe lower value to animals deemed as pests, despite their equal capacity to suffer:

*“... it is entirely necessary to recognise the inherent bias in our systems, and each of us as individuals, against animals who have for centuries been deemed as ‘pests’ and thus afforded less consideration. Any situation where a kitten was stuck in a state of terror for twelve hours, struggling to the point of breaking bones, chewing of his/her own limbs, and then bludgeoned to death (if lucky), drowned, left to suffocate or allowed to die of injuries or dehydration would be considered absolutely unacceptable in our society. This is demonstrated by the horrified reaction when ‘non-target’ animals such as kittens occasionally do get stuck on glue traps.”*

### Conclusion – ethical considerations

The labelling of target species as ‘pests’ in this context should be discouraged in the future. It is important to recognise that ‘pest’ animals have the potential to suffer to the same extent as other sentient ‘non-pest’ species. In considering all ‘pest’ control methods, the Commission would like to see these ethical considerations higher up the agenda and explicitly addressed in all future discussions.

### **Legislation in other countries**

The Commission received information, either directly or in submissions from interest groups, regarding legislation in New Zealand, Ireland and the states of Tasmania and Victoria, Australia.

Ireland: Under section 42 of the Wildlife (Amendment) Act 2000 (Irish Parliament, 2000), the Minister for Environment, Heritage and Local Government has authority to approve and regulate certain traps by order. The Wildlife Act 1976 (Approved Traps, Snares and Nets) Regulations 2003 do not list glue traps as approved traps. It is an offence to import, possess, sell or offer for sale unauthorised traps: there is provision for glue trap use under ministerial authorisation (licence) but we are not aware that any licences have been issued. The National Parks and Wildlife Service has been active in enforcing this legislation, visiting retailers and informing them of the legal position. The ISPCA stated that it had not received any complaints in relation to glue traps and was not aware of any retailers stocking them contrary to the regulations. It

remains possible to source glue traps online although we understand that possession would be a breach.

New Zealand: In 2000, the National Animal Welfare Advisory Committee (NAWAC) an independent statutory committee established under New Zealand's Animal Welfare Act 1999, recommended that the importation, sale and use of glue traps be prohibited in New Zealand. The Animal Welfare (Glueboard Traps) Order 2009 (New Zealand Ministry for Primary Industries, 2009) prohibits sale and use of glue boards for rodents from 1 January 2015, except under Ministerial approval. Ministerial approval to sell or use rodent glue board traps can be granted where it is in the public interest and there is no viable alternative.

The approvals for use are for limited circumstances for:

- biosecurity and conservation purposes
- use in and around food storage and processing facilities
- specialist applications where high hygiene is required.

A five-year period between the issue of the regulations and the prohibition coming into force was put in place to allow time for people and groups who routinely used glue boards as part of their business to investigate and develop more humane alternatives. NAWAC continues to monitor both the granting of Ministerial approvals and the reports that sellers and users are required to supply to the Ministry for Primary Industries.

Tasmania: Amendments in 2008 to the Animal Welfare Act of Tasmania prohibit the use of glue traps for animals, other than with Ministerial exemption. A blanket exemption for licensed commercial operators has been issued, so long as their use complies with the Australian Environmental Pest Managers' Association Guidelines for the Use of Rodent Glueboards in Australia by the Pest Management Industry. (Humane Pest Control, 2006).

Victoria: Glue traps were banned in 2008 from public use and only permitted by ministerial approval for purchase and use by commercial pest controllers in commercial food manufacturing premises. In December 2019 the State Government of Victoria 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 (POCTA) Regulations 2019 (State Government of Victoria (2019)) The government website emphasises:

*"This prohibition includes use by commercial pest controllers for rodent management under any circumstances."*

#### Conclusion – legislation in other countries

In those countries that have introduced legislation, the general direction is toward licensing the use of glue traps in specific and limited circumstances and the use of glue traps by the general public has been banned. Where a strict licensing approach has been adopted the number of applications for such licences has reduced significantly or has not occurred at all. The Commission concludes that an outright ban on the sale of glue traps to the general public is appropriate and that to further

reduce (and ultimately end) their use, a very strict licensing approach should be adopted for industry users.

## **Options for regulation**

### ***Legal and regulatory position in Scotland***

There is currently no specific restriction on the purchase or use of glue traps on rats and mice, either by individuals or industry operators.

It is an offence under the Animal Health and Welfare (Scotland) Act 2006 to cause unnecessary suffering or to fail to meet the welfare needs of an animal under human control, and this is interpreted as meaning a wild animal when it is trapped. It is also an offence under the Wildlife and Countryside Act 1981 to set glue boards in a place where wild birds might be caught. The Pest Management Alliance (PMA) publishes a voluntary code of practice (latest public version is January 2017) for the use of glue traps (PMA, 2017a) for its members.

With regard to mandatory inspection times, it is widely accepted that animals should not be left in a live capture trap for more than 24 hrs, and ideally much less. Twenty-four hours is the period specified under section 11B of the WCA for the inspection of snares (some industry codes recommend twice-daily inspections). The same period is also referenced in other regulatory instruments such as the Scottish General Licences (NatureScot, 2020).

The pest control industry is not currently regulated in Scotland or elsewhere in the UK.

The Scottish Government has powers to regulate the sale and use of items such as glue traps, while issues relating to imports are reserved to the UK government.

### ***Options considered***

Having reviewed the submissions and other evidence, the Commission has considered a number of options that might be recommended to the Scottish Ministers and assessed the likely support for these. It was noted that some stakeholders expressed a preference for one option but supported others in the absence of their first choice, or as a stopgap. The options considered were:

#### **1 Do nothing**

This option was not supported by any of the stakeholder submissions or other sources consulted and is not consistent with the previously stated intention of the Scottish Government. All submissions either support either a prohibition on use by untrained individuals or a wider measure.

#### **2 Outright ban on all sale and all use of glue traps**

This option appears to offer the most immediate positive impact on animal welfare, even while acknowledging that there are welfare problems with other techniques in current use, in particular rodenticides. It was the preferred option of the Petitioners



Andrea Goddard and Lisa Harvey and their supporters (HSI UK, OneKind, Dr Elizabeth Mullineaux, WAWC):

*“Our current position is that we would like to see a total ban on glue trap sale and use in Scotland. We have not been reassured by the Pest Management Alliance (PMA)’s assertion that they can affectively self-regulate their members. The PMA admit their training courses and Codes of Best Practice are not mandatory and so adhering to them cannot be effectively enforced. We also have concerns over the practical implications of restricting glue traps sales to ‘professional users’ only. Suppliers are unable to differentiate between ‘professional’ users and the general public and so an industry-wide registration or licensing system will need to be set up. These issues are insurmountable without implementing complicated legislation, and so we feel a complete ban is the simplest, quickest (in terms of writing and enacting legislation) and the only option available to ensure animals no longer are at risk of unnecessary suffering in these barbaric devices.”*

Other respondents including BC SPCA and UFAW generally supported an outright ban on glue traps. The Scottish Society for the Prevention of Cruelty to Animals (Scottish SPCA) wrote to the Public Petitions Committee in November 2017:

*“The Scottish SPCA would support a ban on the sale and use of glue boards entirely but if that is not possible that their use is restricted to registered pest controllers who are fully aware of the welfare implications involved and the requirement to check such traps appropriately and humanely dispatch any pest species caught.”*

An outright ban is opposed by the BPCA, which submitted to the Public Petitions Committee on 20 August 2020:

*“We must stress however, that an outright ban in our view can only be to the severe detriment of public health.”*

### **3 Prohibition on purchase and use by individuals but retain trained operator/industry use under industry voluntary code**

All stakeholder submissions supported a ban on the purchase and use of glue traps by members of the public.

A voluntary code appeared to be the option preferred by the BPCA, which stated:

*“The PMA has produced a Code of Best Practice for the Humane Use of Glue Boards in consultation with the Department for Environment, Food & Rural Affairs (DEFRA) and the Animal and Plant Health Agency (APHA); it is also supported by the Chartered Institute of Environmental Health (CIEH) and the National Pest Technicians Association.*

*The main recommendations of the Code are:*

- *Glue boards should be used as a last resort when all other tools have proved to be ineffective or inappropriate*
- *Glue boards should only be used by trained and competent professionals*
- *Glue boards should be checked at least every 12 hours, and their continued use should be assessed every 24 hours*

- *Anyone who has placed a glue board must be able to competently and humanely dispatch any caught rodent (making glue boards unsuitable for amateur use)*
- *The technician responsible for the glue board must have a contingency plan where a second technician can inspect the glue traps in an emergency, and an emollient is made available if a non-target species was to be caught*
- *Detailed reports regarding the use of glue boards should be maintained at all times*
- *Glue boards should be removed at the end of treatment and disposed of appropriately.”*

The BPCA commented further:

*“... if it were up to us, only companies who have proven they meet the standards of BPCA membership would have access to the more dangerous tools in our kit - including glue boards.*

*We support any proposed partial ban to glue boards that takes them away from public use or anyone else who wouldn't ordinarily meet BPCA's membership criteria.*

*We support any mandatory labelling or documentation that highlights the risks of improper use (the PMA Code of Best Practice could be used for this).*

*We do not support an outright ban of rodent glue boards for professionals (our definition for which makes up our membership criteria).*

*A ban on glue boards would remove a tool that helps protect some of the most vulnerable people and high-risk environments. This would have a detrimental effect on public health in Scotland.”*

Other stakeholders including HSI UK, OneKind, WAWC, Andrea Goddard and Dr Elizabeth Mullineaux submitted that current codes, including the PMA Code, were inadequate, citing for example the requirement to check traps after 12 hours, *“when simple technology such as motion sensors should allow for a more immediate response to prevent suffering of trapped animals.”*

Dr Mullineaux, a veterinary surgeon with a specialist interest in British wildlife, drew attention to the Five Domains model (Mellor, 2017) and the potentially severe negative welfare impacts on the trapped animals, with Domains 3 (Health), 4 (Behaviour) and 5 (Mental state) all being compromised:

*“The speed at which welfare is affected in a struggling rodent is rapid (minutes) and yet suffering and death can be prolonged (3-24hrs) (Mason and Littin, 2003). The recommended frequency of checking traps (currently 12hrs; PMA, 2017a) has the potential to result in considerable suffering.”*

These respondents believed that voluntary codes to manage the professional use of glue traps lack a robust mechanism to assess competency of users, coupled with lack of effective monitoring and enforcement to ensure that such codes are adhered to in practice.

SASA also commented on the desirability of developing mechanisms for more frequent checks and removal of captured animals, including a licensing requirement for named, trained site representatives. In addition:

*“... the use of a remote trap alert system might also offer a solution, alerting the trap operator as soon as something is caught so that they or an on-site member of staff with appropriate training can immediately set out to deal with the capture. Again, under a licensing system the parameters of such a system could be set out in the licence application so that the licence issuer is satisfied that it will minimise the length of time a rodent spends in the trap and has failsafe built in. A similar alternative might be to have a live video feed of a trap streamed to the trap operator who can check it at regular intervals (or perhaps use software that detects a change in image and can alert them as some CCTV devices can). Bespoke monitoring systems for glue traps don't currently exist but if there was demand then some existing systems might be expanded to include them. As far as I'm aware, all of the big pest control contractors have some kind of remote alert system available and there are many others on the market, if there was demand for a glue trap monitor I'm sure one could be developed and integrated into an existing system.”*

Other alleged deficiencies listed by HSI UK included there being:

*“... no requirement to provide proof of the operator's competency prior to purchase and use; no requirement to keep full records of the frequency of inspections, delays, details of use, trapped species, etc.; and no requirement to submit full records to a designated authority in order to monitor and ensure correct use and compliance with the code.”*

These criticisms refer both to the Code of Practice published in 2017 and the revised version which, as far as we can see, has not been published but was submitted in draft to the Public Petitions Committee on 14 November 2019 (PMA, 2019).

#### **4 Prohibition on purchase and use by individuals but retain trained operator/industry use under (i) statutory code/guidance or (ii) licence (general/individual/case by case)**

The Animal Health and Welfare (Scotland) Act 2006 gives powers to the Scottish Ministers to issue statutory codes for the welfare of animals (s.37), or statutory guidance (s.38). The Act normally only applies to animals that are domesticated in the British Isles, but it can also cover wild animals when they are under the control of humans, for example when they are deliberately trapped. The Cabinet Secretary discussed the creation of a mandatory Scottish code with the Public Petitions Committee in April 2018, describing it as the preferred option at that time.

REHIS supported control of use, which the Commission has taken to mean statutory control:

*“REHIS would support the removal of glue boards for sale to the amateur sector restricting their use to the professional pest control sector only. In addition, their use within the professional sector needs to be controlled, so that only trained and*

*competent personnel can use these products in accordance with a strict set of guidelines.”*

REHIS suggested that the PMA Code could provide the basis of either a Statutory Code of Practice or a general licensing scheme. Others criticised this code as inadequate, as described above.

The BPCA return did not differentiate between a voluntary and a statutory code, although it did support mandatory labelling of traps to reflect its own code.

SASA supported restricting glue trap use to trained professionals only, with restrictions on sales to the public and a government and industry Code of Practice agreed, *“including frequent minimum check intervals and standards for record keeping, also ensuring that anyone responsible for checking a trap is appropriately trained, particularly in humane dispatch.”*

SASA and REHIS also raised the possibility of a general licence, analogous to those issued for the taking and killing of wild birds (NatureScot, 2020), as an option for light touch regulation.

On case-by-case licensing, the submission from BPCA stated that a typical scenario for using glue traps by its members would be when there was a risk to public health and an urgent need to remove rodents. In their view, applying for a licence for every single use would introduce delay and would be unduly onerous on both applicant and licensing authority. Others, such as UFAW, supported case-by-case licensing if an outright ban is not forthcoming, limited to pest control experts (and only where control of a target species is of very high priority), with stringent reporting and monitoring.

### **5 As Option 4, but with a review prior to outright ban**

This option offers limited short-term positive outcomes by eliminating use by untrained individuals and ensuring that industry users are subject to a licence with conditions attached to improve welfare protection. Should continued use of glue traps be considered necessary in strictly limited circumstances, efforts should be made to find humane alternatives with the aim of an eventual total ban. A review should take place within a maximum of three years in the expectation that a full ban will be realistic by then, while the long lead-in time would provide motivation for the industry to implement alternative practices.

A number of stakeholders who supported an outright ban appeared to accept that this would be a possible approach.

## **Conclusions and recommendations**

### **1. Reasons for using glue traps**

There are public health concerns in certain high-risk situations that clearly require effective and rapid pest control in order to reduce the spread of disease. However, the Commission is not convinced that evidence exists supporting the view that glue traps are genuinely the only method of last resort.

### **2. Animal welfare issues**

The Commission noted unanimous recognition that glue traps cause animal suffering, with the majority of respondents indicating the likelihood that their use causes significant and potentially prolonged animal suffering to the target species. Importantly, concerns are not isolated to a particular aspect of the use of glue traps and even with optimal use (frequent checking and effective dispatch) there remains a significant animal welfare concern. It is the view of the Commission that there is no way that glue traps can be used without causing animal suffering.

### **3. Non-target captures**

There is an undeniable risk of capture of non-target species. However, without knowing how frequently glue traps are used it is not possible to quantify that risk. Information on how 'indiscriminate' other forms of control are in comparison to glue traps would also be useful – in relation to rodenticides in particular.

### **4. Alternative methods**

There are a range of alternative pest control methods available and glue traps are often cited as only being used as a last resort in high risk (to public health) settings. The Commission concludes that it is difficult to justify the use of glue traps, except possibly in the most significantly high-risk (to public health) settings, such as hospitals. However, even in those settings the Commission cannot support the continued use of glue traps, given the very high likelihood of animal suffering. We note no evidence is provided to back up the statement that glue traps are only used as a last resort and there is a likelihood that this is not always the case with some operators. Independent expert advice should be harnessed to identify a ranking of likely suffering caused by all current methods of pest control to justify a hierarchy or cascade of future use.

### **5. Ethical considerations**

The labelling of target species as 'pests' in this context should be discouraged in the future. It is important to recognise that 'pest' animals have the potential to suffer to the same extent as other sentient 'non-pest' species. In considering all 'pest' control methods, the Commission would like to see these ethical considerations higher up the agenda and explicitly addressed in all future discussions.

### **6. Legislation in other countries**

In those countries that have introduced legislation the general direction is toward licensing the use of glue traps in specific and limited circumstances and the use of glue traps by the general public has been banned. Where a strict licensing approach has been adopted the number of applications for such licences has reduced significantly or has not occurred at all. The Commission concludes that the outright

ban for sale of glue traps to the general public is appropriate and that, to further reduce (and ultimately end) their use a very strict licensing approach should be adopted.

**The Commission believes that the animal welfare issues connected with the use of glue traps would justify an immediate outright ban on their sale and use. This is our preferred recommendation. However, given that some agencies have suggested that in some cases there is no alternative to the use of glue traps as a last resort, if the Scottish Ministers are not minded to introduce such a ban at this stage, the Commission recommends implementation of Option 5 (until such time as an investigation into alternatives has been completed), with the following specific recommendations:**

1. There should be an immediate outright ban on the sale of glue traps to the general public.
2. An interim licensing regime should be introduced as soon as is practicable.
3. The parameters of that licensing regime should form part of future discussions and consultations. However, the Commission would favour the following requirements:
  - a. Licences must be applied for by individual operators (not companies – see note below).
  - b. Licences must only apply to a single location where there is a significant risk to public health.
  - c. Licences must only be situation-specific (referring to a particular incursion).
  - d. Licences must be time-limited and not open-ended.
  - e. Licences must only be granted where clear evidence of a ‘cascade’ of use of alternative methods can be demonstrated. Documentation of such a cascade of use should be a prerequisite of a licence application
  - f. Licences must require operators to implement mechanisms to reduce the time between capture and humane destruction to the minimum, ideally by use of remote monitoring methods to ensure immediate attendance at the trap site.
4. The licensing regime should be time-limited and subject to review within three years of its introduction, with a view to ending the use of glue traps altogether following investigation of alternative approaches.
5. Professional pest control companies should be encouraged to invest in research and development aimed at the identification of additional humane methods that would replace the apparent need for glue traps.
6. Once the legal status of any proposed Code of Practice has been determined, the Commission recommends the creation of an independent group of experts in animal welfare and behaviour, ethicists and pest control practitioners, with support and oversight from the Commission, to develop a Scottish code.

Note: The Commission considered the option of a general licence but preferred individual licensing because other general licences only permit methods that are

assessed to be relatively humane, including non-lethal methods. This contrasts with the clear evidence that glue traps cause animal suffering as soon as the animal becomes trapped. It is unlikely that a general licence system would be able to mitigate this to any significant degree. Individual licences would ensure greater protection and accountability, particularly if they include conditions pertaining to record-keeping and reporting. The application process could be designed to include training and accreditation from an approved body.

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## **Appendix I – Membership of the Scottish Animal Welfare Commission**

The Scottish Animal Welfare Commission Members are:

- Professor Cathy Dwyer from Scotland's Rural College and the University of Edinburgh (Chair)
- Dr Harvey Carruthers, veterinary surgeon
- Mike Radford, lawyer specialising in Animal Welfare
- Paula Boyden, Veterinary Director at Dogs Trust
- Professor Marie Haskell, Professor in Animal Welfare Science at Scotland's Rural College
- Dr James Yeates, Chief Executive Officer of Cats Protection
- Libby Anderson, Animal Welfare Policy Advisor
- Dr Simon Girling, Head of Veterinary Services, Royal Zoological Society of Scotland
- Mike Flynn, Chief Superintendent at the Scottish SPCA
- Dr Pete Goddard, veterinary surgeon
- Professor Tim Parkin, Professor of Veterinary Epidemiology, University of Glasgow
- Dr Andrew Kitchener, Principal Curator of Vertebrates at the National Museum of Scotland

Full biographies are at <https://www.gov.scot/publications/scottish-animal-welfare-commission-member-biographies/>.

## **Appendix II – Acknowledgments**

The following organisations and individuals provided written submissions to the Commission.

### Statutory and professional bodies

British Pest Control Association (BPCA)

British Veterinary Association (BVA)

New Zealand National Animal Welfare Advisory Committee (NAWAC)

Royal Environmental Health Institute of Scotland (REHIS)

Science & Advice for Scottish Agriculture (SASA)

### Animal welfare organisations

British Columbia Society for the Prevention of Cruelty to Animals (BC SPCA)

Humane Society International UK (HSI UK)

Humane Wildlife Solutions

OneKind

Universities Federation for Animal Welfare (UFAW)

Wild Animal Welfare Committee (WAWC)

### Individuals

Andrea Goddard and Lisa Harvey, Petitioners to Scottish Parliament

Dr Elizabeth Mullineaux BVM&S, DVM&S, CertSHP, MRCVS, RCVS Recognised Specialist in Wildlife Medicine (Mammalian), Edinburgh

The Commission also considered a number of the submissions to the Public Petitions Committee of the Scottish Parliament relating to PE01671.

### **Appendix III – Contact Details**

The Commission is contactable through the Scottish Government’s Secretariat Support:

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