

Franck David Esq
Assistant Clerk to the Public Petitions Committee
Scottish Parliament
Edinburgh
EH99 1SP

21st July 2008

Dear Mr David

PETITION PE1124

Thank you for inviting the Scottish Gamekeepers Association (SGA) to respond to Petition PE1124, which calls on the Scottish Parliament to urge the Scottish Government to amend the Nature Conservation (Scotland) Act 2004 to ban the manufacture, sale, possession and use of all snares.

Our role as professional land managers, whether in National Parks, in Forestry or on Private ground is fundamentally one of conservation. For some of our members, this of course focuses on the maintenance of game species to generate a harvestable surplus for shooting. For others, the role may place more weight on general habitat management, for instance, within National Parks. Whether our members are employed in the public or the private sector, there is an acknowledged wider benefit to biodiversity from our work.

Biodiversity benefits

Studies regularly contrast a richer array of birdlife on kept ground, than on unkept ground. The Game Conservancy Trust's authoritative report, *Nature's Gain*, published in 2005, provides clear evidence. Other work including *The Singing Fields* and ongoing research work by the Trust at Otterburn continues to point towards this. The essential feature which enables us to generate this biodiversity is predator control. Even the RSPB's 2007 report, *the Predation of Wild Birds in the UK*, states "However, there are cases, particularly for some ground nesting birds, where predator control can provide a valuable additional tool for conservation managers." There is therefore general agreement across the land management spectrum about the significance of predator management.

Predator and pest control

Even allowing for current control, the population of foxes and rabbits in the UK is increasing. Both can be enormously destructive. Briefly, foxes predate a range of

ground-nesting birds and may have significant local impact on lambs, particularly in upland areas. Rabbits can inflict serious damage on moorland, crops and young trees. Whether our members work for private interests, or for public bodies such as the Forestry Commission, we are obliged to manage ground under our control in line with Scottish legislation and EC directives. That makes predator and pest control not only essential but also a specific conservation requirement.

To control fox and rabbit populations, responsible gamekeepers need to have a number of tools to cope with different situations on the ground. Unless snaring remains as one of these tools, fox and rabbit numbers will increase because other methods cannot possibly make up the gap in control. To expect shooting to do so, as suggested in certain quarters, is simply unrealistic. Foxes and rabbits are generally most active at night. Although our members do carry out night-time shooting on suitable ground, there are clear practical and safety issues that limit effort.

Although we are aware of studies suggesting that snaring accounts for 30% of all foxes controlled by gamekeepers each year across the UK, our own research amongst members showed that on some land where it would be difficult to use other methods, this figure is as high as 75%. This is particularly true of upland Scotland, where the impact on biodiversity of any reduction in snaring would be most acutely felt. Without snaring, particularly in environmentally sensitive areas, we would then face a massive battle to contain increased predation and damage as well as comply with conservation requirements.

Welfare

We recognise that there are welfare implications in the work we undertake, and this is clearly the case with snaring. Professionally carried out, the snare is a restraint, allowing us to dispatch pests and predators humanely. Deployed correctly, they can be highly selective, even down to targeting an individual fox.

It would of course be wrong to suggest that snares do not cause any welfare concerns. Clearly, there are some instances in snaring where things have not gone right. However, we firmly believe that where such cases occur, they are invariably the result of inexperience or simple bad practice. The Minister alluded to this in his statement to Scottish Parliament, going so far as to indicate that in some cases, this amounted to criminal practice.

Minister's statement

As professional managers, we wish to ensure that the law with regard to snaring is adhered to because we need the use of this tool into the future. We therefore broadly acknowledge the proposals the Minister intends to bring forward. With a general increase in fox and rabbit numbers, particularly on the urban fringe, we do not think snaring should be left to amateurs. The menu of accreditation, training and a snare coding system as well as changes to the law to remove doubt about how and where snares can be deployed, will isolate bad and criminal activity and therefore enhance best practice. We are currently working with other Land Management groups to draw together one code of practice for snaring that will incorporate the Minister's requirements ahead of legislation.

Comments on petition debate – specific issues raised

We note your invitation to comment on specific issues raised in the petition debate.

The Petitioners cast doubt on the accuracy of the PACEC figures relating to the economic value of shooting, whilst asserting a figure for wildlife tourism. We are not economists so it is difficult for us to comment on either the accuracy of the PACEC report or the VisitScotland figures comparing shooting with wildlife tourism. However, we would point out that our members are working in both the public and private sectors, generating an over-arching biodiversity dividend, so there are clear benefits both to tourism and shooting interests.

The Petitioners argue that the legal regime is not working and is unenforceable. It may interest the committee to note that the Scottish Government recently implemented a coding system under General Licence provisions for cage and Larsen traps used by Land Managers to capture crows and magpies. Under this system, gamekeepers must now register their traps with local wildlife crime officers and attach designated codes to the traps. Our members have taken up this registration, recognising that this will help to maintain their continued use in future and to distinguish between legal and illegal usage. With registration and coding already accepted, we see the same pattern being repeated in due course for snares. The requirements for inspection of traps are similar to those for snares. We firmly believe that this will not only drive enforcement, but it will also act as a strong preventive measure. Identity codes will create a clear incentive to comply with appropriate setting and inspection.

Both sides of the argument assert different views on the extent of problems caused by snaring, based on partial evidence. Monitoring (for instance by Wildlife Crime Officers) linked to the audit trail of a coding system would provide clarity. Again, we believe that this too can help drive best practice.

We would also like to make the review committee aware that the Game and Wildlife Conservation Trust and other organisations are putting considerable effort into the design, testing and application of different snares, including breakaway sections for non-target species release. Communication systems are also being trialled that indicate when a snare has been sprung, enabling land managers to identify and promptly inspect them.

Summary response

In summary, we clearly hold a different view to the petitioners. We do not take the responsibility for predator control lightly. We are committed to best practice across our membership. We believe that the retention of snaring provides significant biodiversity benefits with regard to the enhancement of Scottish Wildlife. In turn, there are economic advantages to all forms of tourism. We also believe that issues around bad and criminal snaring that may currently result in welfare problems are addressed by the Minister's proposals in respect of coding, training, accreditation and specific legislation.

Yours sincerely,

Alex Hogg
Chairman