

Petition 1124: Snaring
Response from petitioners to Scottish Government
January 2009

Our petition is based on the undisputed facts that snaring causes perceptible distress to the captured animal and does not render the animal insensitive to pain as swiftly as technically possible. It cannot in any sense meet internationally agreed standards for humane slaughter of animals, such as those agreed by the International Whaling Commission for whales being killed in a natural environment, or the standards published by the OIE for domestic animals killed for food production or disease control.

We cannot agree with the response to our Petition where it maintains that snaring is considered to be an acceptable tool for culling wild mammals. Whilst we agree that some methods of culling can in theory and practice meet international standards and may thus be considered as useful culling tools, snaring can never meet those standards.

We maintain our position that snares are inhumane, cause avoidable suffering and thus cruelty and should be withdrawn from use.

As we have previously stated we feel at this stage it is not helpful to continue going back and forth to prove and disprove the various arguments and we firmly believe that the many differences between our views and those of the Minister indicate that a more detailed inquiry requires to be made. This would allow Members of the Scottish Parliament to represent their views, and those of their constituents, on this significant issue of animal welfare.

Regulation of snaring

In his letter to the Convener, the Minister mentions that his proposed new measures to regulate snaring in Scotland will be considered by the Legislation Sub-Group of the Partnership Against Wildlife Crime in Scotland. We would mention in passing that Advocates for Animals requested the opportunity to serve on this group but was turned down. We are also concerned that the Scottish Government has formally endorsed a Practitioners' Guide produced by the Game and Wildlife Conservation Trust, Scottish Gamekeepers Association and British Association for Shooting and Conservation as we feel that this will constrain the work of the Sub-Group.

Turning to the two papers submitted by the Minister, we note that these provide a great deal of detail and, while we accept a number of the points made, we would respectfully disagree with others. For example, on the snaring of mountain hares, the paper cites the Game and Wildlife Conservation Trust, an organisation that promotes snaring, as its authority for questioning the requirement for a licence to snare this species. We however would cite a number of authorities including the Scottish SPCA which is the

primary enforcement organisation for animal welfare in Scotland, to the effect that a licence is required under the terms of national and European conservation legislation.

We have made inquiries of SNH regarding this matter and understand that a legal opinion has now been sought. We cited the fact that in 2006-2007, a reported 5,078 mountain hares were snared when licences were in fact only issued for 190. In our view this demonstrates that little regard is paid to current regulations. This widespread disregard of the law is nonetheless excused by the Scottish Government on the basis of advice from a shooting organisation. We suggest that the Scottish Government should be quoting advice from its own agency, Scottish Natural Heritage, and not the Game and Wildlife Conservation Trust.

On non-target capture, we accept that the animals reported by animal welfare agencies such as the Scottish SPCA are likely to contain a higher proportion of these than may be encountered in routine field conditions. We think it likely that operators of snares that find non-target animals will dispose of them, rather than report them. However in numerical terms, these numbers are still of great concern. We note that the Scottish Government does not say that non-target captures are insignificant: the table reproduced from Macdonald et al (2000) shows high figures from some studies (badgers amounting to 21 per cent of captures in one study). The Scottish Government also cites, as we have done, the concern of the Independent Working Group on Snares (IWGS) that it may be impossible to reduce non-target captures below 40 per cent in some circumstances. We suggest that this is one of the unacceptable consequences of allowing snaring to continue.

Agriculture

On agriculture, the paper quotes our response which in turn quoted the NFUS and its statement that it lacked robust data. We mentioned this because the supposed importance of snaring for farming was founded upon by the Government and because the Government had asked the NFUS for such data. The paper from SASA provides considerably more data but we ask the committee to note that snaring is not considered an important method of fox control used by arable or fodder crop farmers. However, SASA does not have data from farmers whose main enterprise is the rearing of sheep, pigs or poultry outdoors.

The paper takes issue with our statement that most pigs in Scotland are kept indoors. We made this statement in the context of the NFUS contention that fox predation was a problem on pig farms. It is not central to our argument but will clarify it since the Scottish Government has queried it. In UK terms it is generally estimated that 40 per cent of sows are managed in outdoor systems (in other words, the majority 60 per cent are kept indoors), but this figure does not cover pigs kept for finishing.

Animal welfare

We also believe the Government's paper fails to properly address the serious issue of animal welfare. Because snaring, in the Government's opinion is 'sometimes the least bad option' this does not make it acceptable. No amount of regulation will stop the pain and suffering caused by such a crude device. The paper has given no adequate response to the adverse welfare impacts of snaring as listed by the IWGS which include:

- The stress of restraint, which could include frustration, anxiety and rage;
- Fear of predation or capture whilst held by the snare;
- Friction, penetration and self-inflicted skin injuries whilst struggling against or fighting the tether;
- Pain associated with dislocations and amputations especially with un-stopped snares;
- Ischemic pain (due to lack of blood supply) associated with legation of body parts;
- Compression or injuries in muscles, nerves and joints associated with violent movements against restraint;
- Thirst, hunger and exposure when restrained for long periods;
- Inflammatory pain and pain from contusions associated with injuries during restraint, and in some cases persisting following escape;
- Pain and malaise associated with infections arising from injuries, in escapees;
- Neuropathic pain in those escapees that experience nerve injuries;
- Reduced ability of injured escapees to forage, move and hence survive;
- Stress of capture and handling before despatch by the snare operator;
- Pain and injury associated with killing by the snare operator if unconsciousness is not immediate.

It was this list of injuries that we referred to as being directly at odds with humane practice, not to the report summary referred to in the Minister's paper. We continue to maintain that this list supports our view.

The second SASA paper sets out the supposed advantages of snaring over other methods of fox control. These are largely based on operator convenience and cost, and ignore the requirements of welfare and conservation. We disagree with the observation that snaring takes place during normal daylight hours - it is the setting of snares that is carried out by day, but the traps are in place 24 hours a day and, if foxes are more active at night they are likely to be caught at night and confined in the trap for several hours before they are found and killed.

We note that SASA confirms that rabbit snares are not set to kill; evidence given to the Scottish Parliament by a representative of the Scottish Gamekeepers' Association was however to the effect that most rabbits found in snares are dead. This is precisely the sort of point that could be explored by a more specialist inquiry. The SASA paper refers to a small number of rabbits killed instantly by neck dislocation; however rabbits also

die of slow strangulation, which is extremely inhumane. Again, it would be valuable to establish these patterns definitively, once and for all, by means of a thorough inquiry.

Issues not addressed

In addition, we point out that the Minister has not addressed a number of points in our paper submitted to the Committee in August. These include the number of landowning organisations which choose to manage their land without the use of snares including:

- RSPB
- Forestry Commission Scotland
- Scottish Natural Heritage
- Scottish Wildlife Trust
- Woodland Trust
- John Muir Trust
- Freedom Food
- All 32 Scottish local authorities

The response has also failed to address the threat snares pose to species such as the capercaillie and the Scottish wildcat as well as the fact that, of both Scotland's National Park Authorities, one does not use snares at all and the other would only use them as 'a last resort'.

The Scottish Government response suggests that we have quoted scientific papers selectively. Scientific evidence is a resource to inform debate and ethical judgment. We make no apology for selective use of science to support our contention that fox control is carried out more widely than necessary to achieve the desired utility.

We conclude by urging the Committee not to close this petition but to instead to take the necessary action to allow an inquiry into the future of snaring in Scotland. This petition now stands at 9510 signatures; 79 per cent of people in Scotland think that snares should be made illegal; 75 per cent of vets in Scotland think they should be made illegal; a public consultation generated a 2:1 majority calling for a ban; and of the 7,182 representations to the Government prior to its announcement on snaring in February last year, 99.9 per cent were in support of a ban.