

# **Agreement on International Humane Trapping Standards: Questionnaire and Evidence Gathering exercise**

## **Background**

The aim of the Agreement on Humane trapping standards (AIHTS) is to ensure a sufficient level of welfare of trapped animals, and to further improve this welfare. The agreement covers trapping of animals for fur, skin or meat, conservation, pest control and general wildlife management purposes.

All traps designed to kill or restrain are covered by AIHTS, including cage traps, and snares (however, none of the species relevant to the UK are trapped using snares).

AIHTS covers a range of species commonly trapped outside the UK for commercial purposes, five of which occur in the wild in the UK:

- European Badger, *Meles meles*
- European Beaver, *Castor fiber*
- European Otter, *Lutra lutra*
- Pine Marten, *Martes martes*
- Stoat, *Mustela erminea*

Of these only the stoat is regularly and widely trapped in the UK and it is the only species for which lethal traps are commonly used. The other species are fully protected and less frequently trapped, using non-lethal traps under licence for conservation, disease control or damage prevention purposes.

This consultation sets out proposals for how the AIHTS will be implemented in the UK in order to improve the welfare of certain trapped animals and also to gather information on the supply, use and marking of traps to better inform our impact assessment.

This consultation is in line with the Code of Practice on Consultations. This can be found at <https://www.gov.uk/government/publications/consultation-principles-guidance>

***PLEASE COMPLETE THIS QUESTIONNAIRE ONLY ONCE.***

## **Confidentiality**

Copies of responses will be made available to the public on request. If you do not want your response – including your name, contact details and any other personal information – to be publicly available, please say so clearly in writing when you send your response to the consultation. Please note, if your computer automatically includes a confidentiality disclaimer, that won't count as a confidentiality request.

Please explain why you need to keep details confidential. We will take your reasons into account if someone asks for this information under freedom of information legislation. But, because of the law, we cannot promise that we will always be able to keep those details confidential.

We will summarize all responses and place this summary on our website at:

[www.gov.uk/defra](http://www.gov.uk/defra).

This summary will include a list of names of organisations that responded but not people's personal names, addresses or other contact details.

Would you like your response to be confidential?

Yes  No

If you answered Yes to this question please give your reason.

## About yourself

**Question 1:** What is your name?

Wild Animal Welfare Committee

**Question 2:** What is your email/postal address?

C/O 50 Montrose Terrace, Edinburgh, EH7 5DL

wildanimalwelfarecommittee@gmail.com

**Question 3:** Are you responding on behalf of a group or organisation, business (e.g. estate, farm, pest control, manufacturing, retail etc.) or responding as an individual?

Group/Organisation	<input checked="" type="radio"/>	Group/organisation name Wild Animal Welfare Committee	Number of members represented	12
Business	<input type="radio"/>	Business type (please specify	Number of members represented	
Individual	<input type="radio"/>			

**Question 4:** Where do you undertake **most** of your trapping/manufacturing/retail activity?  
Choose only one answer.

Country	Trap	Manu	Reta
England	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Wales	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Scotland	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Northern Ireland	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**Question 5:** What is your profession? Can tick more than one box

Gamekeeper	<input type="radio"/>
Farmer	<input type="radio"/>
Pest Controller	<input type="radio"/>
Local Government Pest Controller	<input type="radio"/>
Conservation Agency	<input type="radio"/>
Manufacturer	<input type="radio"/>
Retailer	<input type="radio"/>
Other (please specify) Wild Animal Welfare Committee	<input type="radio"/>

**Question 6:** Are you a member of or affiliated to any organisations associated with shooting, pest control or conservation?

Yes  No

If so please state name of organisation(s):

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# Consultation Questions

## **1. Implementing the Agreement on International Humane Trapping Standards**

**Question 1:** Do you agree or disagree with our proposed approach for implementing the licensing/prohibition requirements of AIHTS?

Agree  **Disagree**  Don't know

If you answered 'Disagree' to this question please give your reason, setting out any alternative approach you prefer.

The Wild Animal Welfare Committee (WAWC) is a charity set up in September 2014 to provide independent advice and evidence about the welfare of free-living wild animals in the UK, aiming to reduce harm to animals and prevent suffering caused by human activity.

The WAWC offers informed independent advice based on scientific research and modern understanding of animal sentience, with a view to influencing public policy, so that wild animal welfare is optimised.

The WAWC has the following concerns about the proposals for implementation of the Agreement on International Humane Trapping Standards (AIHTS) by the UK.

While the AIHTS does cover the use of traps for conservation and wildlife management purposes, it originated as a means of permitting the international fur trade as long as capture methods met supposedly humane standards. The WAWC is strongly opposed to the fur trade and is concerned that the UK's endorsement of the AIHTS at the very least sends a signal that the UK condones this unethical and often inhumane use of animals.

We are also concerned that the consultation document states that "*After the EU exit vote, Defra Ministers reaffirmed the government's commitment to implement the AIHTS and be committed to AIHTS once we've exited the EU.*" Given that following Brexit the UK will no longer be party to the Treaty, we are concerned that this indicates an intention to accede to the agreement as a party in its own right. This appears at odds with the opportunities potentially provided by Brexit for the UK to improve animal welfare standards, as proposed in Defra's (2010) wildlife management policy making framework.

Notwithstanding our concerns about the fur trade, the WAWC is disappointed to see how narrowly this consultation has been framed with regard to AIHTS implementation in the UK. It does not question the need for killing predatory wild animals in the name of pest control or wildlife management as it should (see Defra 2005; Defra 2010). On ethical and scientific grounds, the WAWC believes that the routine killing of any predatory animal cannot be justified unless:

- research demonstrates that killing is necessary (Defra 2005),
- killing is effective at resolving the problem identified,
- killing causes the least welfare harm possible, and

- lethal control is sustainable (Defra (2005); Defra (2010); Dubois et al (2017)).

Where such evidence is available, and a robust case is made, which includes monitoring for the effects on population and welfare, in order to be humane any killing method must cause rapid, irreversible loss of consciousness in the target animal. The WAWC is concerned that these criteria have not been addressed in this consultation.

No good reason has been put forward for the routine killing of stoats in the UK. There is no market for ermine and while there is routine killing of stoats on kept shooting estates, there is neither sufficient data to determine the necessity or sustainability of this practice (Harris and Yalden, 2008), nor peer-reviewed publications that demonstrate that it has the intended protective effect on game birds.

While implementation of the AIHTS may bring some animal welfare benefits for trapped stoats, a thorough review of the necessity, means and welfare impacts of trapping and killing wild animals in the UK, and an overhaul of the whole trapping regulation system in the UK, are long overdue.

Where the science and ethical considerations justify the lethal trapping of wild animals (and we believe these circumstances to be few and far between), the loss of consciousness should be instantaneous and any trap not meeting this criterion should not be approved. The Government applies this criterion for the approval of systems for the slaughter and killing of farm animals and WAWC believes that a similar approach is necessary for the trapping and killing of wild animals.

Not only do times to irreversible unconsciousness need to be dramatically reduced for lethal traps, live trap design also needs to be regulated, regular trap inspection needs to become mandatory for all lethal and live traps, and exemptions from welfare approval for break-back and mole traps need to be removed.

We agree that the public do value animal welfare (as mentioned in the risk assessment, and by Defra's (2010) wildlife management policy making framework) and this was demonstrated recently in a wildlife management context by a survey of British householders which found that they considered humaneness to be the most important feature of a mole control method (Baker et al 2016).

We also have an over-arching concern about what will happen to all the old traps that are no longer legitimate following implementation of the AIHTS. There is a risk that unless these traps are properly disposed of they will end up in the wrong hands and could be misused. Could a central trap disposal/recycling scheme be implemented? This could also act as an amnesty for any other illegal traps.

We provide further comments in our responses to Questions 2 and 3 below, both directly on the AIHTS implementation and on related trapping regulation issues.

Baker, S.E., Ellwood, S.A., Johnson, P.J. and Macdonald, D.W. (2016) Moles and mole control on British farms, amenities and gardens after strychnine withdrawal. *Animals*, 6(6): 39. Special edition on: Ethical and Welfare Dimensions of the Management of Unwanted Wildlife. <http://www.mdpi.com/2076-2615/6/6/39/htm>.

Defra (2005) Defra code of practice on the use of snares in fox and rabbit control. Defra, London. <http://www.antisnaring.org.uk/assets/images/defra-snares-code-of-practice-1.pdf>.

Defra (2010) Wildlife Management in England; A policy making framework for resolving human-wildlife conflicts. Defra, London.

<http://webarchive.nationalarchives.gov.uk/20130402220919/http://archive.defra.gov.uk/wildlife-pets/wildlife/management/documents/policy-making-framework.pdf>.

Dubois, S., Fenwick, N., Ryan, E.A., Baker, L., Baker, S.E., Beausoleil, N.J., Carter, S., Cartwright, B., Costa, F., Draper, C., Griffin, J., Grogan, A., Howald, G., Jones, B., Littin, K.E., Lombard, A.T., Mellor, D.J., Ramp, D., Schuppli, C.A. and Fraser, D. (2017) International consensus principles for ethical wildlife control. *Conservation Biology*, 31(4): 753-760. <http://onlinelibrary.wiley.com/doi/10.1111/cobi.12896/epdf>.

Harris, S. and Yalden, D.W. (Eds) (2008) *Mammals of the British Isles: Handbook*. 4th Edition, Mammal Society, 800 pp.

**Question 2:** Do you agree or disagree with our proposed approach for live capture traps?

Agree  Disagree  Don't know

If you answered 'Disagree' to this question please give your reason, setting out any alternative approach you prefer.

We have the following concerns:

- 1) In cases where there are insufficient welfare data to consider certification of a live trap design for an AIHTS species (consultation paragraphs 40 – 42 ) and it is proposed that live trapping should be allowed under an individual licence, providing that the trapper collects welfare data which may then be used to judge AIHTS-compliance of that trap design, we believe that these data should ideally be collected by an independent vet (or other suitably qualified individual – which should be defined). We are concerned that without independent oversight, additional unsuitable traps will be added to the UK's armoury of low welfare traps. Failing the attendance of a suitably qualified individual, the trapper should be required to collect good quality, close-up, photographic evidence regarding injuries or lack thereof, as well as behavioural information - as per the AIHTS live-trap standards. Data should be collected for every capture (of either target or non-target species). These should be submitted with licence returns for assessment by the licensing authority with reference where necessary to an independent vet or other suitably qualified individual. Failure to comply should result in sanctions, e.g. withdrawal of the licence.
- 2) There is no plan to require that live traps are checked at suitable frequencies. We understand that (apart from the duty of care under general animal welfare legislation) there is no specific legal obligation to inspect live traps in the UK (other than snares (BASC, NGA, NFU et al. 2016), and Larsen traps used under General Licence, all of which must be checked at least every 24 hours). If the welfare of live-trapped animals is to be protected, it is not sufficient to provide that traps must meet certain standards without ensuring that they are checked at suitable intervals to avoid animals suffering from injury, starvation, dehydration, exposure or predatory threat/attack. If the government is committed to enhancing animal welfare standards for trapped animals, as stated in the consultation document, genuine implementation of the aims of the AIHTS should start with a legal obligation for at least daily inspection of live traps used for stoats, pine marten, otters, beavers and badgers (to be followed in time by an equivalent obligation to check live capture traps used for all species). Checking live traps is important not only for the welfare

of trapped target species but also for that of non-target species which may be caught or injured.

- 3) There is no move to ensure the suitability of live capture traps used for other (non-AIHTS) species. The WAWC hopes that AIHTS implementation will be the beginning of a process that brings live traps for all species up to the same standard, as it is not logical to protect the welfare only of certain trapped vertebrate species and not all. Such a task would involve consideration of whether each species is suited to live-trapping and, where necessary, of species-specific trap inspection intervals, e.g. for sensitive species such as moles.

BASC, NFU, NGA et al (2016) Code of best practice on the use of snares for fox control in England. Defra, London.

**Question 3:** Do you agree or disagree with our proposed approach for lethal traps?

Agree  Disagree  Don't know

If you answered 'Disagree' to this question please give your reason, setting out any alternative approach you prefer.

We realise that implementation of the AIHTS is a large undertaking and we approve broadly of the proposed approach for lethal stoat traps. However:

- 1) The AIHTS implementation process is revealing that many traps on the Spring Traps Approval Orders were approved historically before any formal testing against the AIHTS Time to Irreversible Unconsciousness (TIU) criterion for most species, of 5 minutes, was introduced for this purpose (apparently in 2011). Not only do most of the currently approved stoat traps not meet the stoat-specific 45 second AIHTS TIU criterion, but it is possible and likely that many of these same traps that were approved for other species before 2011 do not meet the UK's existing 5-minute TIU criterion either, and yet will remain approved for these other species. Since we believe the current TIU criteria have no logical scientific foundation, we would wish to see the development and approval of traps where TIU was effectively reduced to zero in order to protect animal welfare.

We hope that the AIHTS implementation will begin a process to remove from the Spring Traps Approval Orders all traps intended for any species (regardless of whether they are an AIHTS species) which do not meet the current UK welfare approval standards. All Spring Traps Approval Orders should be actively rationalised for all currently approved traps for all species. We also hope that the exemption from welfare approval will be lifted from break-back traps used with rats and mice, and from mole traps (Baker et al 2012). This could be facilitated via a Voluntary Trap Approval scheme in the interim so that some approved traps were available before the exemption was lifted (Baker 2017). We repeat that it is not logical to protect the welfare only of certain species, when other species are also trapped in large numbers by similar means. In time, we feel that all spring traps

should be required to meet stricter, potentially tiered, criteria, as suggested by Talling & Inglis (2009).

- 2) We are concerned that continued use of multi-species lethal traps that do not pass approval criteria for stoats, but which can continue to be used for the other species for which they are approved, will pose a threat to stoats. We are not convinced that users of such traps will be able to predict reliably whether they are unlikely to catch a stoat and we feel that the continued availability of these traps will cause offences to be committed. We understand that, between them, the new stoat traps (DOC and Goodnature) have been tested and approved for grey squirrels, mink, rabbits, rats, stoats and weasels, so we question the need to permit continued use of the old multi-species traps which have been shown to be inadequate for stoats.
- 3) Claims (made in the consultation document and several times in the associated risk assessment) that by identifying new traps that meet the AIHTS standard for stoats, other species trapped in these same traps will benefit are unfounded and misleading. A trap that is better for one species is not automatically better for others because of differences in body morphology and size (e.g. squirrels are larger and differently shaped to stoats). Body strike locations will differ among different species - and this is key in achieving irreversible unconsciousness quickly.
- 4) As stated above for live traps, we believe that if the government is committed to enhancing animal welfare standards for trapped animals, genuine implementation of the aims of the AIHTS should include introduction of a legal obligation to inspect lethal traps for stoats each day (and that this will be followed in time by an obligation to check lethal traps used for all species). Currently as we understand there is a legal obligation to check lethal traps only for rabbits and hares. Checking lethal traps is important not only for the welfare of individuals of target species, but also for the welfare of individuals of non-target species, either of which may be caught/injured rather than killed quickly.

Baker, S.E., Ellwood, S.A., Tagarielli, V.L. & Macdonald, D.W. (2012) Mechanical Performance of Rat, Mouse and Mole Spring Traps, and Possible Implications for Welfare Performance. PLoS ONE, 7(6), e39334. doi:10.1371/journal.pone.0039334.  
<http://www.plosone.org/article/authors/info%3Adoi%2F10.1371%2Fjournal.pone.0039334>.

Baker, S.E. (2017) A Voluntary Trap Approval scheme to end trap welfare inequality in the UK. *Animal Welfare*, 26(1): 131-133.

Talling JC, Inglis IR (2009) Improvements to trapping standards. DG ENV, 361 p. JC TallingIR Inglis2009Improvements to trapping standards.DG ENV, 361 p.  
[http://ec.europa.eu/environment/biodiversity/animal\\_welfare/hts/pdf/final\\_report.pdf](http://ec.europa.eu/environment/biodiversity/animal_welfare/hts/pdf/final_report.pdf).

**Question 4:** Do you agree or disagree with our proposed approach with respect to the training requirements?

Agree  **Disagree**  Don't know

If you answered 'Disagree', please give your reason, setting out any alternative approach you prefer.



The proposed approach would be adequate if all the necessary information, e.g. that a trap is approved only in a certain 'set', or when used with a tunnel etc, was available both in the instructions included with the trap at purchase, and on the trap manufacturer's website. We do not feel that supplying such information only on the Spring Trap Approval Orders or in a licence is sufficient, as many trappers may not have access to the internet.

**Question 5:** Do you agree or disagree with our proposed approach with respect to the trap marking requirements?

**Agree**  **Disagree**  **Don't know**

If you answered 'Disagree', please give your reason, setting out any alternative approach you prefer.

**Question 6:** Do you agree or disagree with our proposed approach with respect to the provision of trap instructions requirements?

**Agree**  **Disagree**  **Don't know**

If you answered 'Disagree', please give your reason, setting out any alternative approach you prefer.

As above, ref training: The proposed approach would be adequate if all the necessary information, e.g. that a trap is approved only in a certain set, or when used with a tunnel, was available both in the instructions included with the trap at purchase, as well as on the trap manufacturer's website. We do not feel that supplying such information only on the spring trap approval order or in a licence is adequate, as many trappers may not have access to the internet.

We also feel that while many users might make their own trap tunnels, any such equipment necessary to fulfil the requirements of approved trap use should always be offered for sale alongside approved traps and their need clearly highlighted at point of sale.

**Question 7:** Do you agree or disagree with the approach undertaken in the impact assessment?

**Agree**  **Disagree**  **Don't know**

If you answered 'Disagree', please give your reason, setting out any alternative approach you prefer.

**Question 8:** Do you agree or disagree with the conclusions of the impact assessment?

**Agree**  **Disagree**  **Don't know**

If you answered 'Disagree', please give your reason, setting out any supporting evidence.

## 2. Evidence Gathering

**Not applicable**

**Question 9:** What **additional** costs may be incurred by you or those you represent as a result of implementing the AIHTS requirements for manufacturers? (For example, include costs incurred in relation to the alteration of designs and instructions and provision of suitable identification).

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Please quantify <b>additional</b> costs in £	
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**Question 10:** What **additional** training costs may be incurred by you or those you represent as a result of implementing the AIHTS?

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Please quantify <b>additional</b> cost in £	
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**Question 11:** Which make and models of stoat trap and how many do you or those you represent use?

Make and model	Number used
BMI Magnum 110	
BMI Magnum 116	

Conibear 110-2	
Conibear 120-2	
DOC 150	
DOC 200	
DOC 250	
Fenn MK I	
Fenn MK II	
Fenn MK III	
Fenn MKIV	
Fenn MKVI	
Goodnature A24	
Imbra MKI	
Imbra MKII	
Juby	
Kania Trap 2000	
Kania Trap 2500	
Lloyd	
Payne MK 1	
Sawyer	
Solway MK4	
Solway MK6	
Springer No. 4	
Springer No. 6	
WCS Tube Trap	
Cage-trap	
Other (please specify)	
Other (please specify)	





**Question 13:** How often in years do you or those you represent replace a particular make and model of trap (how long is its working life)?

Please **do not** include traps that YOU or those you represent have but no longer use.

Make and model	Working Life of Trap
BMI Magnum 110	
BMI Magnum 116	
Conibear 110-2	
Conibear 120-2	
DOC 150	
DOC 200	
DOC 250	
Fenn MK I	
Fenn MK II	
Fenn MK III	
Fenn MKIV	
Fenn MKVI	
Goodnature A24	
Imbra MKI	
Imbra MKII	
Juby	
Kania Trap 2000	
Kania Trap 2500	
Lloyd	
Payne MK 1	
Sawyer	
Solway MK4	
Solway MK6	
Springer No. 4	
Springer No. 6	
WCS Tube Trap	
Cage-trap	
Other (please specify)	
Other (please specify)	

The purpose of the following questions is to estimate the average numbers of animals (other than stoat – see Q12) listed on AIHTS that are trapped each year and identify the traps used. Those species not ordinarily resident in the UK may be held in captivity and occasionally require trapping.

**Question 14:** Roughly how many of each AIHTS species other than stoat have you or those you represent caught in the last year?

**Question 15:** What make and model of trap did you use?

Common Name	Species	Q14 Number caught	Q15 Make & model
Badger (European)	<i>Meles meles</i>		
Badger (North American)	<i>Taxidea taxus</i>		
Beaver (European)	<i>Castor fiber</i>		
Beaver (North American)	<i>Castor canadensis</i>		
Bobcat	<i>Felix rufus</i>		
Coyote	<i>Canis latrans</i>		
Fisher	<i>Martes pennanti</i>		
Lynx (European)	<i>Lynx lynx</i>		
Lynx (North American)	<i>Lynx canadensis</i>		
Marten (American)	<i>Martes americana</i>		
Marten (Pine)	<i>Martes martes</i>		
Muskrat	<i>Ondatra zibethicus</i>		
Otter (European)	<i>Lutra lutra</i>		
Otter (North American)	<i>Lutra canadensis</i>		
Racoon	<i>Procyon lotor</i>		
Racoon dog	<i>Nyctereutes procyonoides</i>		
Sable	<i>Martes zibellina</i>		
Wolf	<i>Canis lupus</i>		
None of the species listed			







**Question 19:** How do you buy your traps? (can tick more than one box)

UK retailer direct (store)	<input type="checkbox"/>
UK retailer direct (catalogue or online)	<input type="checkbox"/>
Overseas direct (catalogue or online)	<input type="checkbox"/>
Marketplace (Amazon, eBay etc.)	<input type="checkbox"/>
N/A (make your own)	<input type="checkbox"/>

**Question 20:** How much do you estimate you have spent in £ on traps in the last year?

Please specify in £	<input type="text"/>
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**Question 21:** Any other comments you wish to make, relevant to your use of traps against the species concerned.

The questions on use/purchase of traps are not applicable to us as we are an animal welfare committee and do not conduct trapping.
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