



Hopetoun Estates Office, Home Farm,
Hopetoun, South Queensferry
EH30 9SL

t: 0131 202 7670
scottishhq@gwct.org.uk
www.gwct.org.uk

Finlay Carson MSP
Convener of the Rural Affairs and Islands Committee
The Scottish Parliament
Edinburgh EH99 1SP
20th October 2023

Dear Convener,

Proposal to ban snaring

GWCT welcomes the opportunity to give evidence to the Committee on the proposal to ban snaring on 8th November. In advance of the session, we note other submissions to the Committee on this subject and wish to clear up some misapprehensions that have emerged in correspondence.

Taking account of both welfare and conservation concerns

Firstly, the Trust fully recognises the significance of welfare concerns regarding the use of snares and has invested years of work to secure improvements through research, design, testing, operating practice, and training. We acknowledge that such use places complete emphasis on professional management and best practice in snare training. The deployment of snares as part of a suite of legal predator control options must be rational, achievable, proportionate, targeted, and humane. This led us to develop the Humane Cable Restraint (HCR) both for fox research and for targeted predator control purposes. To ensure the HCR passes the Agreement on International Humane Trapping Standards (AIHTS) for live-capture of foxes, an appropriate weak-point or breakaway unit must be placed in the design. The inclusion of the breakaway unit, double swivels and increased distance between the safety stop and the running eye are not yet mandatory requirements in Scotland, despite other technical improvements following the introduction of the Wildlife and Natural Environment (Scotland) Act 2011.

If welfare considerations have been paramount in development work, our predation research over decades continues to demonstrate the equal necessity to manage for conservation and economic good. The reports attached with this letter draw on peer-reviewed evidence to demonstrate the significance of predator control in arresting and reversing the decline in vulnerable and iconic ground-nesting birds. With biodiversity so evidently in crisis, now is not the time to close off predator control options that can support recovery. We undertake to work with stakeholders to ensure such options remain fully compliant with all welfare requirements whilst providing for conservation and economic good.

Scottish Government cites a paper from the British Veterinary Association and the British Veterinary Zoological Society to support a ban on snares. Again, we acknowledge the welfare concerns which are central to the paper. However, it mentions, but does not assess the risks to species conservation or the impact to our livestock economy should predator control options be removed. Nor does it consider the technical improvements that have led to HCRs incorporating breakaways units and other key safety features. The paper identifies the Five Domains model for assessing animal welfare. Globally, the welfare impacts of wildlife capture devices are assessed using criteria relating to indicators of poor welfare. These include AIHTS, to which UK is a signatory. If the Five Domains model is applied to any other form of fox trap, the answers are the same for welfare, yet the paper proposes banning snares and using baited cage traps. GWCT research has found cage traps to be ineffective at catching rural foxes and are unselective, catching other mammals and raptors.

Patron: HM King Charles III

FRAGS Executive: R. Draycott, *PhD*; S. Evans; A. Hoodless, *PhD*; A. Leake, *PhD, FRAGS, FIAGRM*; R. Kennedy; J. Payne, *MInstF*; N. Sheeran, *ACMA, CGMA*

Chief Executive: Mrs Teresa Dent CBE,

Shooting has been proposed as a replacement for snaring, yet restraints accounted for between 10-80% of fox control in the case studies set out in appendix 1 to the 'Response to SAWC' report attached. These variations also indicate that for reasons of safety, shooting may be limited by vegetation, weather or by topography. It is highly unlikely that shooting will ever make up the difference if snaring is banned and may also increase the frequency of unsafe and unwise shooting in an attempt to control predation. This risks injury to foxes and deteriorating welfare rather than careful, humane dispatch. The studies demonstrate key conservation gains, where 8 Priority species benefited from predation control.

Proposal on the way forward – balancing welfare requirements with conservation priorities

If we are to balance welfare considerations with conservation, we believe that a practical way forward would be to ban all forms of snare **except** those restraints that meet AIHTS standards and therefore incorporate a breakaway component, plus design adjustments recommended following the 2011 WANE Act and subsequent reviews in 2016 and 2021. This would also help differentiate illegal use of traditional snares, whether of unsuitable wire, other materials including twine, or the absence of safety features such as stop positions, double swivels and breakaway units. We therefore support the proposal brought forward by Scottish Land & Estates and the RELM Group of land management organisations that usage should also only be permitted under licence and subject to training and registration requirements required by the WANE Act.

We also believe that it will be sensible to ensure that licensing requirements include recording both for an audit trail and for long-term monitoring of conservation outcomes. The Trust has introduced a predator control recording app as an evidence base for this, covering positioning, active / disabled / removed, catch, by-catch, notes, photos and monitoring of interference. The app also facilitates transect recording for monitoring of vulnerable species.

We hope that this approach offers a practical solution to the necessary balance between welfare and conservation in light of the biodiversity emergency we face.

Yours sincerely,

Ross Macleod

Head of Policy (Scotland) E: rmacleod@gwct.org.uk M: 07773 898 625