Dear Mr David,

CONSIDERATION OF PETITION PE1124

The Scottish Rural Property & Business Association (SRPBA) were not specifically invited to submit a submission regarding the above Petition PE1124, however as an organisation that represents nearly three thousands land owners, land managers and rural businesses across Scotland, we felt it was important that our voice was heard on this matter. We are aware that other rural organisations have been asked to submit evidence to the Committee and I would like to record our support for, and agreement with, the views put forward by the Scottish Estates Business Group, the Scottish Countryside Alliance and the Scottish Gamekeepers Association.

The SRPBA is firmly of the view that those who manage Scotland’s countryside need to be able to have the tools to undertake their jobs effectively, protect their livelihoods and promote conservation and biodiversity. Hill farmers, estates, crofters, gamekeepers and small holders all need to be able to protect their stock, their crops and their businesses. They all have a crucial role to play in Scotland’s rural economy while at the same time managing and promoting Scotland’s biodiversity. Snaring is often the most effective and efficient method of managing fox and rabbit populations. It is sometimes the only practical method.

There are three core reasons why snaring is vitally important as a land management tool. These are to promote agriculture, the rural economy and conservation.

**Agriculture**

Fox control is vital especially to protect lambs in hill farming areas and it is increasingly done in partnership with local gamekeepers. Rabbits must be controlled to protect agricultural crops as well as sensitive flora. Under Section 1 of the Pests Act 1954, practically the whole of Britain has been declared a rabbit clearance area and the occupier of any land has a continuing obligation to kill or take rabbits on his land. Rabbits can damage sensitive flora, crops and young trees and undermine grassy banks (including burrowing under railway lines). Snaring is one of the most widely used methods of rabbit control.
**The Economy.**
Shooting is worth £240 million per annum to the Scottish economy (PACEC, 2006) representing income and employment to Scotland’s most fragile rural economies and providing a solid foundation for rural communities. Snaring plays an important role in shoot management and ultimately in sustainable economic and social development of rural communities.

- Shooting and stalking contribute money to rural areas. “The bulk of this money is spent at times when other forms of tourism are at a low level.” (PACEC, 2006)
- 58,000 workers are paid by shooting, amounting to the equivalent of 11,000 full-time jobs.
- Of Scotland’s 7.8 million hectares, 4.4 million are influenced by shooting (some 60% of rural Scotland) and 0.7 million hectares are directly managed for shooting. As a result shooting not only provides the equivalent of 2,000 full-time conservation jobs but spends £43 million a year on improving habitat and wildlife management.

Without snares, foxes and rabbits could inflict significantly greater damage on economic activities as diverse as agriculture, forestry and eco-tourism, all of which rely on a managed environment. Indeed our National Parks in Scotland have statutory obligations to conserve and enhance the natural heritage as well as to promote sustainable economic and social development of the park areas communities. The removal of snaring as a land management tool would be likely to have serious impacts on the achievement of these obligations.

**Conservation**
Two recent reports, “The Singing Fields” (Tapper, 2007), and the RSPB’s “The predation of wild birds in the UK” (Gibbons et al, 2007) clearly demonstrate the advantages of predator control to a wide variety of ground nesting bird species including merlin, red grouse, black grouse, golden plover, lapwing and curlew.

- “The Singing Fields” report concludes “On grouse moors, red grouse, black grouse, lapwing and curlew, are faring better than elsewhere but are in national decline”. At the report’s launch, Dr Mark Avery – RSPB’s Director of Conservation, said: “We are increasingly recognising that predators are having a greater impact on ground-nesting birds and waders and on more and more of our nature reserves are carrying out predator control.”
- The RSPB’s predation review concludes that “…generalist ground predators, such as foxes, can sometimes reduce the population levels of their prey, and that this is a growing worry if we are to conserve populations of threatened ground-nesting birds, for example, lapwings.”
• Snares account for many foxes moving into core capercaillie areas; the Capercaillie Biodiversity Action Plan group has issued guidelines for snare deployment in any capercaillie areas. Without snares, foxes will cause damage; this is also applicable to other areas of conservation interest such as moorland, woodland and coastal fringe, where nesting dotterel, dunlin, black grouse, terns, and eider ducks are just a few of the species that an increase in the fox population could impact.

• Golden plover and lapwing are five times more abundant and curlews are twice as common on managed grouse moors compared with unmanaged moors (Tharme et al, 2001).

• Preliminary results from the Game and Wildlife Conservation Trust’s Upland Wader Experiment at Otterburn quantify the positive impact of predation control, including snaring, on the breeding success of five key moorland bird species.

Hence predator control, including snaring as a key component, serves also to protect species of high conservation value, including declining species such as capercaillie, black grouse, golden plover, lapwing and curlew.

Professional land managers play a pivotal role in ensuring that best practice is demonstrated at all times in the management of Scotland’s countryside. The SRPBA are keen to reassure the Committee that the practices we endorse and implement are carried out to the highest standard and snaring is no different. By law, snares have to be checked at least once within every 24 hour period to ensure captured animals are not restrained longer than necessary. Most animals are caught at night and best practice requires snares to be checked first thing in the morning (BASC Code of Practice) at which time non-target species can be released, target species despatched and any damaged snares removed.

The SRPBA fully recognises the importance of animal welfare as a public concern and it is a key consideration for all those working in the countryside. However, this has quite correctly got to be balanced against the need to protect and conserve Scotland’s biodiversity, natural habitats and rural economy. As highlighted above, the damage that rabbits cause to agriculture and habitats and the threat from predators, such as foxes, to endangered ground-nesting birds such as capercaillie and upland waders, is real and extensive. As such, the SRPBA regards snares as an essential conservation and management tool, but one that should be used in accordance with best practice and carried out to the highest standards.

The SRPBA very much welcomed the announcement on the 20th February by Michael Russell the Environment Minister that he intended to retain snaring as a vital land management tool, but that he would tighten the regulation of snaring under a revised and stricter Code of Practice. We would fully support this approach as one that will
ensure that the management of Scotland’s countryside is of the highest standard and that best practice is demonstrated at all times. A ban on snaring would be highly detrimental to both Scotland’s fragile rural economy and to Scotland’s vulnerable endangered species.

Yours sincerely

Douglas McAdam
Chief Executive