



Finlay Carson MSP
Convener
Rural Affairs and Islands Committee
The Scottish Parliament
Edinburgh
EH99 1SP

c/o Scottish Animal Welfare Commission Secretariat
Animal Health and Welfare Team
P-Spur, Saughton House
Broomhouse Drive
Edinburgh
EH11 3XD
SAWC.Secretariat@gov.scot

10 November 2023

Dear Convener

Thank you for inviting the Scottish Animal Welfare Commission (SAWC) to give evidence on the issue of snaring in the Rural Affairs and Islands Committee on Wednesday 8 November. It was a busy session and there were a number of matters where I would have liked to offer a point of clarification, but time was against us.

1. Glynn Evans referred to humane cable restraints (HCR) as meeting the standards of the Agreement on International Trapping Standards (AIHTS) for restraining traps.

It is not possible to support this assertion as foxes are not one of the species covered by the AIHTS. In addition, the AIHTS standards for restraining traps are low and have been widely criticised by wildlife biologists, conservationists and animal welfare organisations. They contain no reference to indicators of psychological or mental distress and only limited behavioural indicators of poor welfare. The list of physical indicators to be considered in assessing traps describes only very severe injuries such as fracture, severe internal organ damage, haemorrhage, amputation and death. However, significant welfare compromises can occur well before these most severe impacts.

The AIHTS does not address animal handling and dispatching which is a fundamental part of the exercise of snaring.

In 2020, a group of wildlife professionals involved in the capture of mammals suggested that the following list of criticisms was applicable to the AIHTS standards:

- (1) the list of mammal species included in the AIHTS is incomplete;
- (2) the AIHTS have relatively low animal welfare performance thresholds of killing trap acceptance and do not reflect state-of-the-art trapping technology;
- (3) the AIHTS animal welfare indicators and injuries for restraining traps are insufficient;
- (4) the AIHTS testing procedures are neither thorough nor transparent;
- (5) the AIHTS protocols for the use of certified traps are inadequate;
- (6) the AIHTS procedures for the handling and dispatching of animals are nonexistent;
- (7) the AIHTS criteria to assess trap capture efficiency and species selectivity are inappropriate.¹

2. Our assessment of the welfare harms caused by snares is contained in the advice to Ministers published last year². This assessment applied the Five Domains model to the experience for a sentient animal of being trapped in a snare. Most of the harms identified apply even if the snare is of a modified design such as the HCR because they are due to the fact of being captured and restrained in a wire noose. These harms include exposure to the elements and to predation, injuries caused by struggling to escape or trying to chew free, capture myopathy (a condition caused by stress and exertion and with a high morbidity and mortality rate), fear and distress, anxiety, hunger and thirst, breathlessness and stress associated with trying to escape. The welfare harms set in as soon as the animal is captured and may last for up to 24 hours, if the snare is inspected within the current legal time frame.

3. I referred to the presumption in the proposal for a licensing scheme for HCR that the Scottish Ministers *shall grant a licence* “unless they are satisfied that (a) the setting of the humane cable restraint is not necessary for the specified purpose, and (b) another method of red fox control is reasonably practicable on the land.”


Other licensing schemes tend to start from the presumption that a licence *shall not be granted* unless there is no other satisfactory alternative. For example, s.16(1A) of the Wildlife and Countryside Act 1981 provides, for licensing purposes connected with wild birds, that the appropriate authority “shall not grant a licence for any purpose mentioned in subsection (1) unless it is satisfied that, as regards that purpose, there is no other satisfactory solution [...]”. For licensing purposes connected with the killing, injuring or taking of wild animals, s.16(3A) similarly provides: “The appropriate authority shall not grant a licence under subsection 3(i) unless it is satisfied (a) that undertaking the conduct authorised by the licence will give rise to, or contribute towards the achievement of, a significant social or environmental benefit; and (b) that there is no other satisfactory solution.”

¹ Updating the AIHTS Trapping Standards to Improve Animal Welfare and Capture Efficiency and Selectivity (Proulx et al, 2020) <https://www.mdpi.com/2076-2615/10/8/1262>

² <https://www.gov.scot/publications/scottish-animal-welfare-commission-trapping-of-terrestrial-wild-mammals-using-snares-position-paper/>

This precautionary approach is important when we remember that the grant of a licence allows an individual or organisation to carry out an activity that is otherwise illegal. In the case of snares or other cable restraints, rendering the activity illegal is justified by the high welfare cost exacted by these devices. For that reason, SAWC cannot support any licensed exceptions to the proposed ban.

Yours sincerely

A handwritten signature in black ink that reads "Libby Anderson". The signature is written in a cursive style with a large initial 'L'.

Libby Anderson
Member
Scottish Animal Welfare Commission