

# Wildlife Management and Muirburn (Scotland) Bill

## Summary of individual responses to call for views

The Rural Affairs and Islands Committee ran a call for views as part of its scrutiny of the Wildlife Management and Muirburn (Scotland) Bill.

The call for views ran between 31 March and 5 May 2023. The public were asked to respond to eight questions:

### Glue traps

Q1. Do you agree with the proposed ban on the use and purchase of glue traps (sections 1-3)?

### Wildlife traps

Q2. Do you agree there is a need for additional regulation of the use of certain wildlife traps?

Q3. Do you agree with the proposed licensing system for the use of certain wildlife traps (sections 4-5)?

### Licensing scheme for land used to shoot red grouse

Q4. Do you agree there is a need for additional regulation of land to be used to shoot red grouse?

Q5. Do you agree with the proposed licensing system for land to be used to shoot red grouse (sections 6-7)?

### Additional powers to investigate wildlife crime

Q6. Do you agree with the proposal to give the Scottish SPCA additional powers to investigate wildlife crime (section 8)?

### Licensing scheme for muirburn

Q7. Do you agree there is a need for additional regulation for muirburn?

Q8. Do you agree with the proposed licensing system for muirburn (sections 9-19)?

This summary, produced by SPICe and the Participation and Communities Team (PACT), presents the findings of the call for views. The Committee received 5,705 submissions in total, 109 from organisations and 5,596 from individuals.

Significant numbers of individual responses relate to organised campaigns and are similar in content. Therefore, data gathered from this exercise **is not intended to be a representative sample of the population**, but rather give a snapshot of some of the experiences, opinions, questions, improvements, comments and concerns the public who responded to the call for views have about the provisions in the Bill.

The data was reviewed and a small minority of users who created multiple submissions had duplicate submissions removed. While there was evidence of some participants using a campaign template to assist with their response, most participants responded to the call for views in their own words.

The summary below is based on 5,275 responses.

## Where did respondents come from?

While the data is not intended to be representative, the engagement activity achieved strong levels of participation with responses from people in all 32 Scottish local authority areas area taking part. The data also shows significant interest in the Bill from outside of Scotland with over 54% of respondents indicating that they live outside of Scotland.

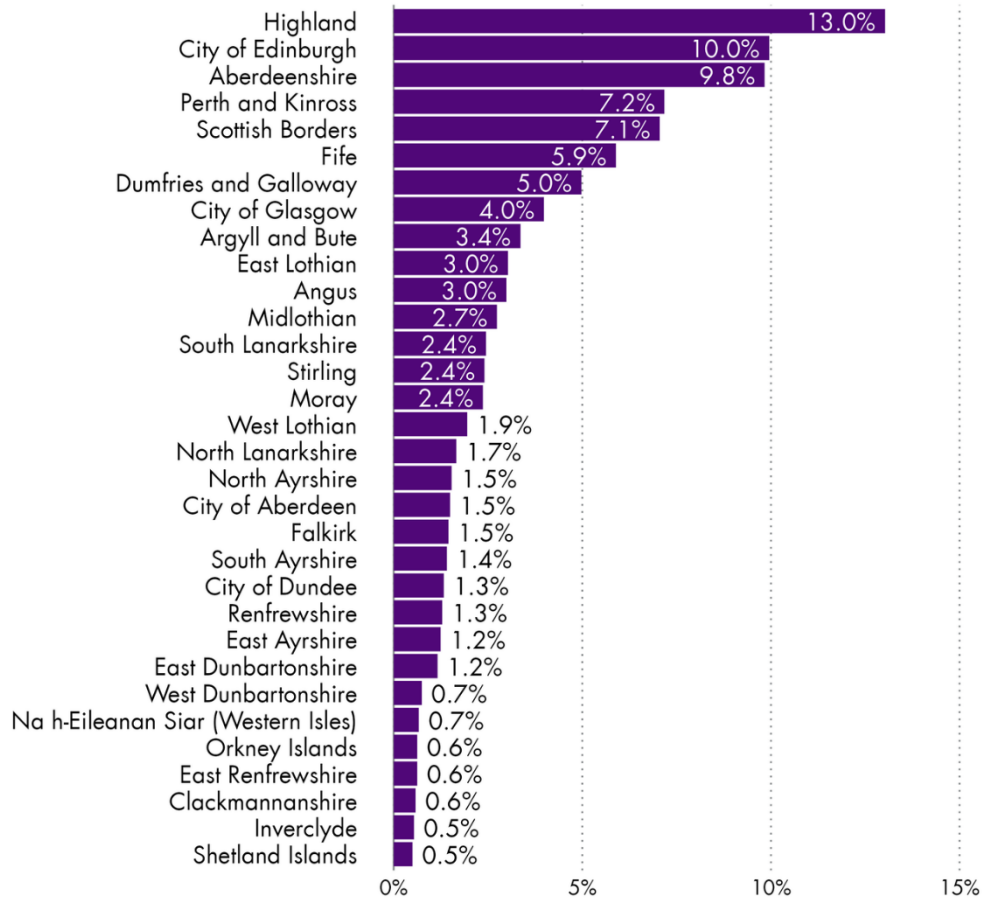
We also carried out periodic checks to confirm the location of responses being received to give us confidence in the data being gathered and to identify responses made in Scotland.

Therefore, much of the analysis is based on the 2,411 responses we received from participants who indicated that they live in Scotland.

Detail of the location of participants based in Scotland is outlined below:

## Which local authority area do you currently live in?

Percentage of all responses from Scotland



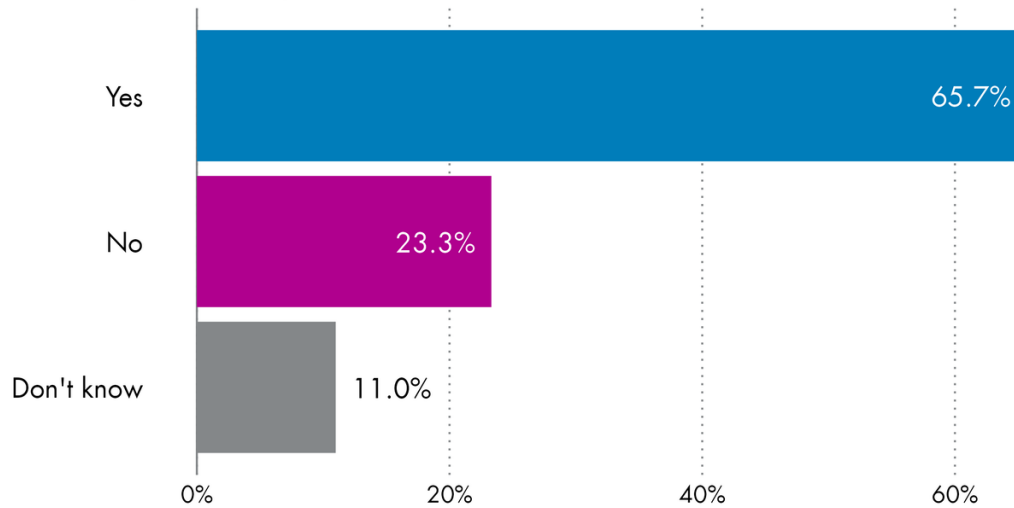
## Results: Summary of Responses

SPICE carried out automated textual analysis of Scottish based submissions to identify key themes and words used by respondents in favour of and against the provisions in the Bill.

Q1. Do you agree with the proposed ban on the use and purchase of glue traps (sections 1-3)?

**Do you agree with the proposed ban on the use and purchase of glue traps (sections 1-3)?**

Percentage of all responses from Scotland



We received 3,630 responses to this qualitative question. 1,618 responses were received from respondents based in Scotland.

A summary of key words and phrases is outlined below:

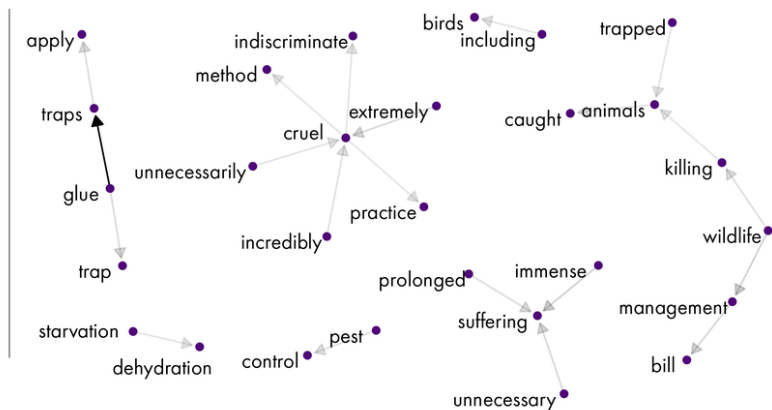
## Do you agree with the proposed ban on the use and purchase of glue traps (sections 1-3)?

Based on responses from Scotland

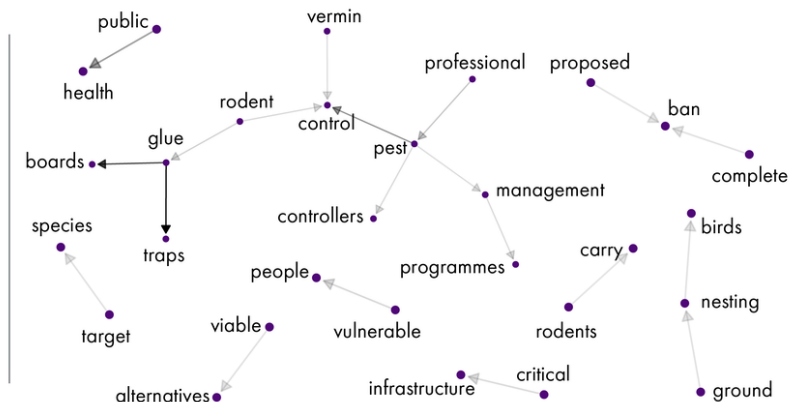
**Wordcloud** - shows the frequency of words used in responses

**Network maps** - shows the relationship between words used in responses.

### Agree with ban



### Disagree with ban



Those who **agreed with the ban** felt that:

- Glue traps are “barbaric” and “cruel” and cause “prolonged” “suffering” to wildlife via “suffocation, starvation, dehydration, or exposure”
- Glue traps are “indiscriminate” and “kill any animal who crosses its path, including bats, birds, frogs, squirrels, and more” “not just the intended species” of “vermin”
- Glue traps could contribute to a reduction in “biodiversity”
- Glue traps are an “imprecise and ineffective” form of pest control
- Glue traps are “outdated” and “no longer necessary” as there are “more humane”, “viable” and “better alternatives... available.”

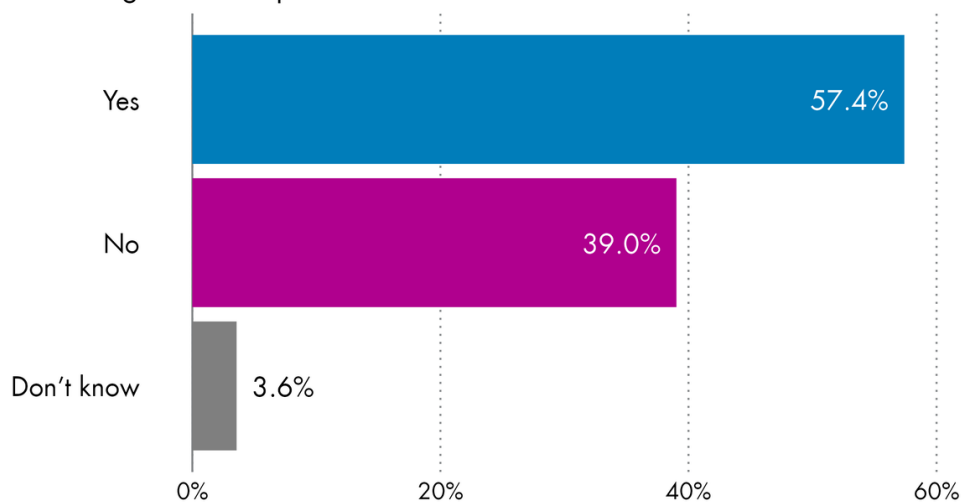
Those who **disagreed with the ban** felt that:

- “When used correctly” glue traps are a “vital tool” and an “integral part of comprehensive” “professional pest control” and “land management” “to help maintain moors”
- “Glue boards are essential for public health” as rodents are a “carrier of disease”
- “Glue traps are an important tool for rodent control in certain circumstance, particularly in houses.”
- Sometimes glue traps are the “only viable means of pest control and can be used within an accepted code of conduct” and should continue to be used as “a last resort” especially “if other methods are not successful”
- Glue traps are a key tool in catching predators in the use of conservation efforts for certain species of birds.
- Any ban would be difficult to enforce

Q2. Do you agree there is a need for additional regulation of the use of certain wildlife traps?

### **Do you agree there is a need for additional regulation of the use of certain wildlife traps?**

Percentage of all responses from Scotland



We received 3,912 responses to this qualitative question. 1,993 responses were received from respondents based in Scotland.

A summary of key words and phrases is outlined below:

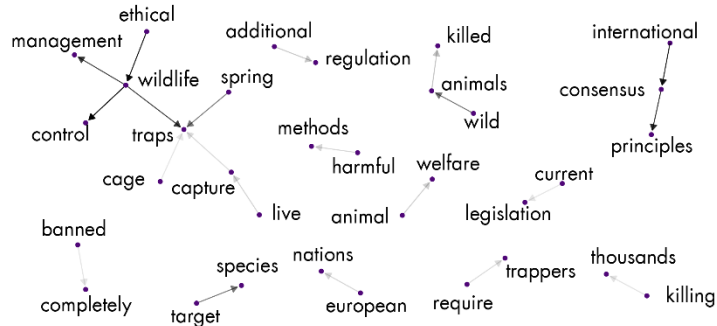
## Do you agree there is a need for additional regulation of the use of certain wildlife traps?

Based on responses from Scotland

**Wordcloud** - shows the frequency of words used in responses

**Network maps** - shows the relationship between words used in responses.

### Agree



### Disagree



Those who **agreed with the need for additional regulation** felt that:

- “There needs to be more restrictive rules and regulations limiting the use of wildlife traps. This will limit the pain and suffering of the animals caught in them.”
- Increased regulation will reduce "unlicensed use" "illegal activity" and “cut down on traps being set but not checked regularly”
- “Training in the humane use of traps is urgently needed.” Increased regulation should ensure only “specifically trained professionals” have access to traps and use them safely and effectively
- Scotland “should adopt the International consensus principles for ethical wildlife control should it be required and be applied to all wildlife management in Scotland.”

- Regulation should go further and introduce a “complete ban” of certain wildlife traps, especially when they are used “to further the sport of shooting” as opposed to other wildlife management

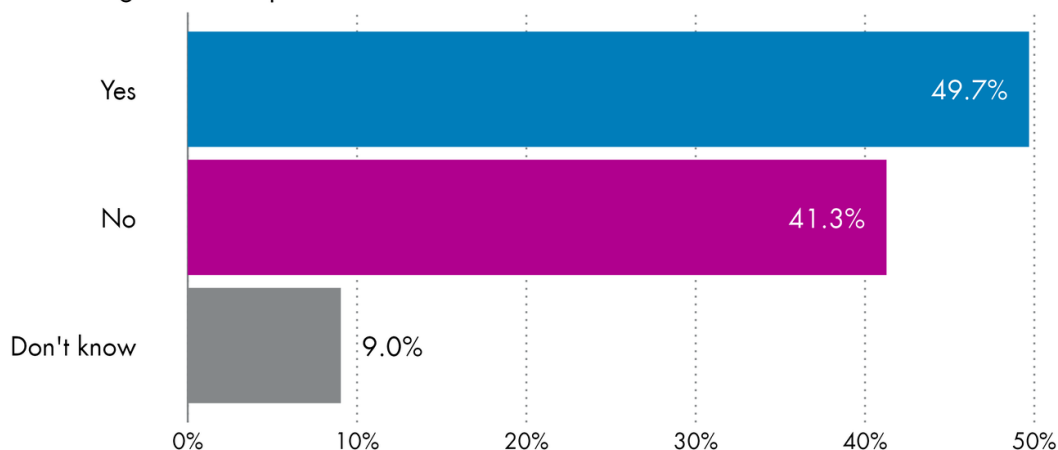
Those who **disagreed with the need for additional regulation** felt that:

- Devices such as spring traps are used “on a limited basis to aid biodiversity objectives”.
- The traps are already “extensively regulated under current regulation outlining the way in which they must be set” and snare operators already “require to be trained and accredited”
- “The vast majority of people managing wildlife... are responsible” “wildlife stewards” and “custodians of the countryside” who “adhere to high professional standards”.
- “Restrictions will just place further burden on responsible managers with the minority ignoring requirements regardless of legislation”
- There is “industry recognition that there is inconsistency in current legislation with respect to trapping and snaring”.

Q3. Do you agree with the proposed licensing system for the use of certain wildlife traps (sections 4-5)?

**Do you agree with the proposed licensing system for the use of certain wildlife traps (sections 4-5)?**

Percentage of all responses from Scotland



We received 3,648 responses to this qualitative question. 1,542 responses were received from respondents based in Scotland.



A summary of key words and phrases is outlined below:

## Do you agree with the proposed licensing system for the use of certain wildlife traps (sections 4-5)?

Based on responses from Scotland

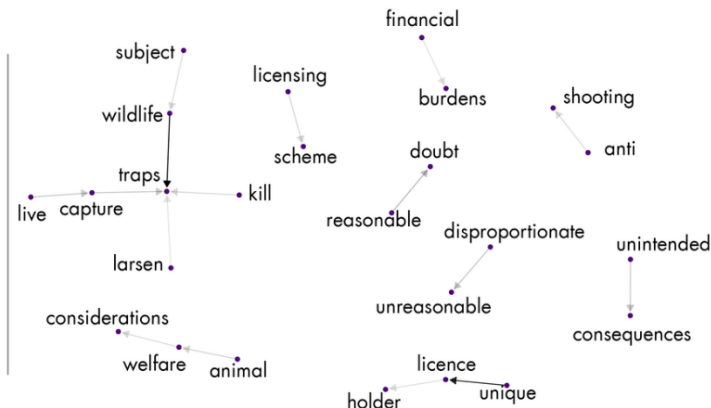
**Wordcloud** - shows the frequency of words used in responses

**Network maps** - shows the relationship between words used in responses.

### Agree



### Disagree



Those who **agreed with the proposed licensing system** felt that:

- The proposals are “proportionate and reasonable” and ensure “proper use and understanding of the risks to wildlife”
- The proposals will “help track misuse of traps and improve accountability” and “reduce the use of illegal trapping and killing of non-target species.”
- The proposals will “encourage the ‘professionalisation’ of countryside management”
- Resources should be made available to access affordable training
- “Monitoring” should take place by an “independent organisation” and “those who do not adhere” to the new licensing system should be penalised
- The proposals “should go some way towards helping with the identification of perpetrators of wildlife crime”
- The use of a “unique licence number on each individual trap would perhaps encourage users to think twice, as to their necessity”

- The cost of licensing and monitoring “should be recovered through those who use traps”

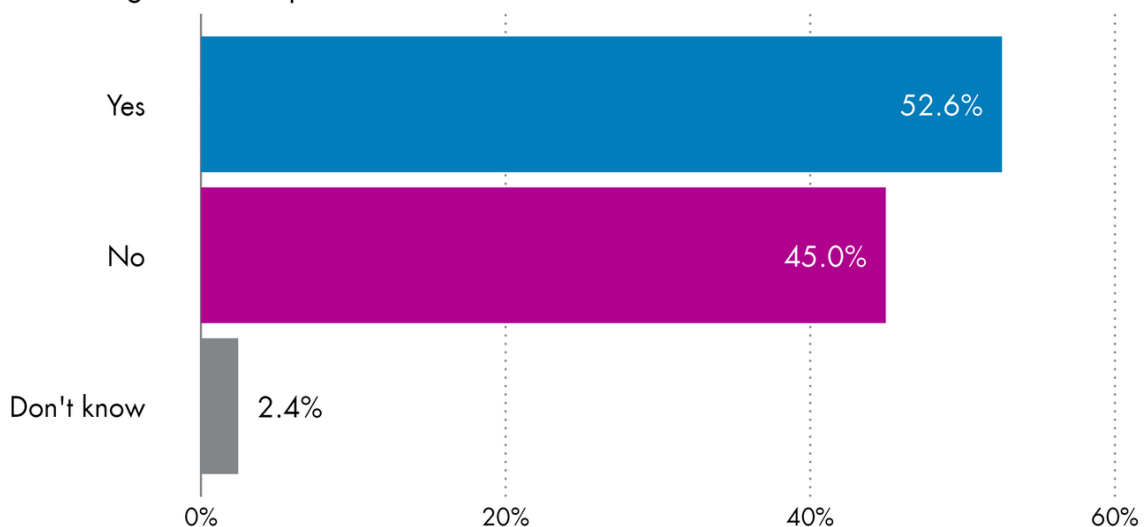
Those who **disagreed with the proposed licensing system** felt that:

- “Legislation already exists to protect various species & if enforced effectively, no further law is required” and “there is no need for further bureaucracy”
- “The rural communities and the general population will be asked to handle more paperwork and licences on top of the very tight controls which are in place already.
- “The proposed licence system imposes additional financial burdens on the shooting sector”
- The “cumbersome and impractical” proposals will “make life harder for pest controllers”
- “Displaying a unique trap number seems wildly unnecessary and disproportionate”
- “Training and accreditation would be complicated” as individuals tend to “only operate one type of trap”
- The proposals will cause “more administrative burden to legitimate users and have minimal, if any effect on wrongdoers”
- Some of those who did not support the licensing system indicated (as above) that they would prefer a complete ban

**Q4. Do you agree there is a need for additional regulation of land to be used to shoot red grouse?**

### **Do you agree there is a need for additional regulation of land to be used to shoot red grouse?**

Percentage of all responses from Scotland



We received 3,882 responses to this qualitative question. 1,675 responses were received from respondents based in Scotland.

A summary of key words and phrases is outlined below:

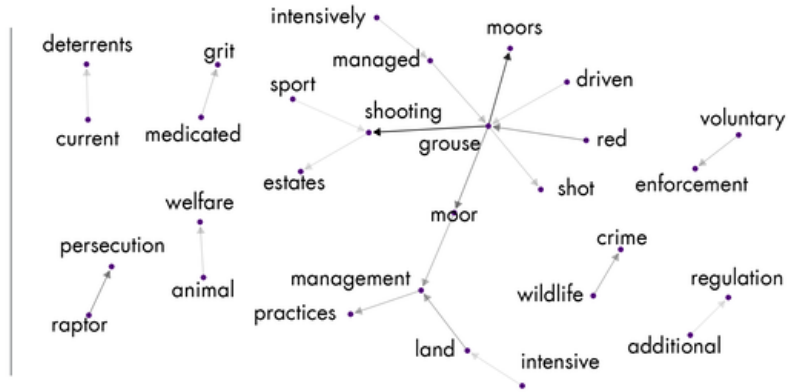
## Do you agree there is a need for additional regulation of land to be used to shoot red grouse?

Based on responses from Scotland

**Wordcloud** - shows the frequency of words used in responses

**Network maps** - shows the relationship between words used in responses.

### Agree



### Disagree



Those who **agreed with the need for additional regulations** felt that:

- Additional regulation was required because “current regulation and practice is repeatedly shown to be inadequate to address illegal activities and to mitigate harms caused to the natural environment and to wildlife.”
- “Current deterrents” are not enough to stop wildlife crime.
- Additional regulation is required “to protect wildlife and the environment” as “self-regulation entirely failed with significant loss of biodiversity and habitats.”
- Current regulation enables some land to be “managed far too intensively to the detriment or almost total exclusion of all other species”.
- “All aspects of this industry need to be heavily regulated with licences revoked for raptor persecution, wildlife crimes, non-compliance of licence restrictions.”

- “Professionally managed grouse moors provide a habitat for a range of other species; licensing of grouse moors would help ensure that shooting of grouse on suitable moors can continue and other non-sporting species can flourish.”
- (As alluded to in previous questions) some respondents agreed with the proposals but indicated they would prefer an “outright ban” of “red grouse shooting” due to considering hunting and shooting to be “blood sports”.

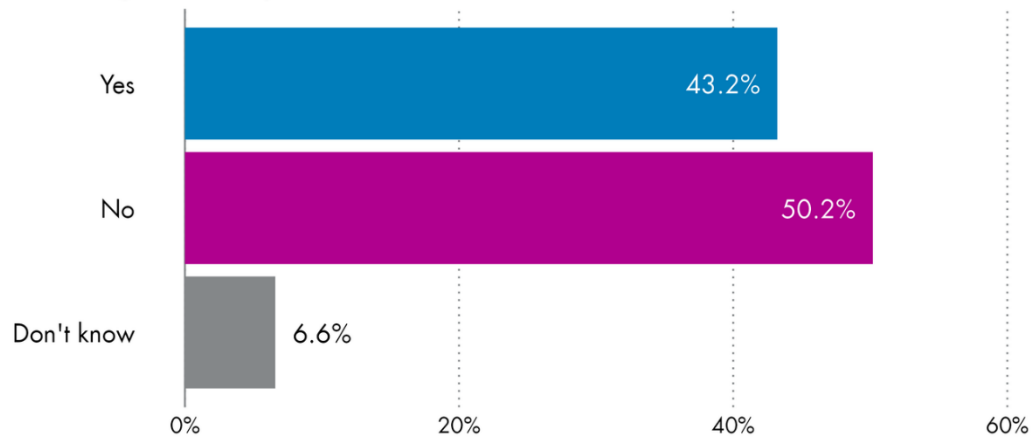
Those who **disagreed with the need for additional regulations** felt that:

- “Local communities would suffer greatly both in terms of employment and lost revenue if more red tape forces moors to become economically unviable”... “The local economy and social well being in remote areas is greatly supported by grouse shooting and the followers of the sport.”
- “There is already too much outside interference by people who don't have the interests of wildlife and rural communities”... “This is just another attack on Scottish rural life.”
- Further regulation would “impede” land managers from doing their job to “nurture and care for the wildlife... and keep it healthy and thriving”
- “The proposals “will curtail the ability of land managers to effectively protect Scotland’s biodiversity and support rural livelihoods.”
- “Current regulations and provisions are sufficient” including “strengthened criminal penalties, the introduction of vicarious liability for landowners and the option for NatureScot to impose restrictions on the use of general licences”
- “Poisoning raptors and illegal trapping practices will not be addressed by simply introducing more legislation which is not enforced either. It will simply complicate what should be a simple matter of enforcing existing law and punishing those who break it”
- Some of those who disagreed with proposals indicated (as above) that they would prefer a complete ban

Q5. Do you agree with the proposed licensing system for land to be used to shoot red grouse (sections 6-7)?

**Do you agree with the proposed licensing system for land to be used to shoot red grouse (sections 6-7)?**

Percentage of all responses from Scotland



We received 3,606 responses to this qualitative question. 1,876 responses were received from respondents based in Scotland.



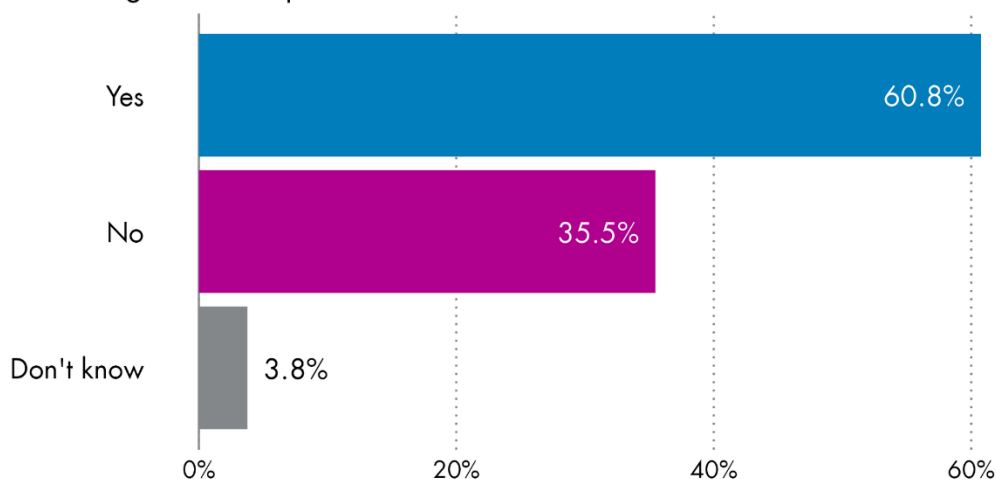
Those who **disagreed with the proposed licensing system** felt that:

- “A licensing scheme is not necessary and is just another layer of bureaucracy that would cost Scottish taxpayers” and “risks loss of rural employment”
- “There is already plenty of legislation around shooting”
- The proposed licensing scheme is “unnecessary and infringement of landowner rights”
- “Responsible farmers and landowners know exactly what to do and when and do not need more red tape”... “Additional regulation will just add more burdens with little conservation or welfare gain.”
- “A one year licence will not allow shoots or estates to plan properly and will curtail longer term investment, which will impact moorland conservation and employment.”
- “The licensing scheme should be for red grouse only. It should not be left open that other species are added at a later date.”
- (As above) a number of respondents indicated that “would support a ban rather than licensing”.

Q6. Do you agree with the proposal to give the Scottish SPCA additional powers to investigate wildlife crime (section 8)?

**Do you agree with the proposal to give the Scottish SPCA additional powers to investigate wildlife crime (section 8)?**

Percentage of all responses from Scotland



We received 3,678 responses to this qualitative question. 1,921 responses were received from respondents based in Scotland.

A summary of key words and phrases is outlined below:

## Do you agree with the proposal to give the Scottish SPCA additional powers to investigate wildlife crime (section 8)?

Based on responses from Scotland

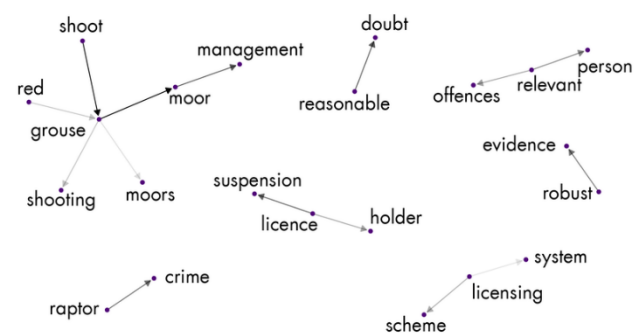
**Wordcloud** - shows the frequency of words used in responses

**Network maps** - shows the relationship between words used in responses.

### Agree



### Disagree



Those who **agreed with the proposals** felt that:

- The “SSPCA (should have the) power to investigate and gather evidence” in order to “tackle wildlife crime” and “Increase chances of catching those responsible for crimes involving wildlife”
- Additional powers for the SSPCA are “needed to reduce the burden on police”.
- “The SPCA do an invaluable job and the number of posts should increase to monitor our uplands effectively” as they have “specialist knowledge” and they would be the “ideal organisation to carry out these inspections”
- Giving additional powers to the SSPCA “would enhance enforcement of wildlife legislation generally.
- “A Scottish SPCA inspector can enter land to attend to a bird or animal caught and injured (ie suffering) in an illegally-set trap, but their powers do not allow them to search for similar traps set nearby (ie preventing suffering) or for



victims killed (presumably having suffered) in other such traps. This inconsistency needs addressed as a matter of urgency.”

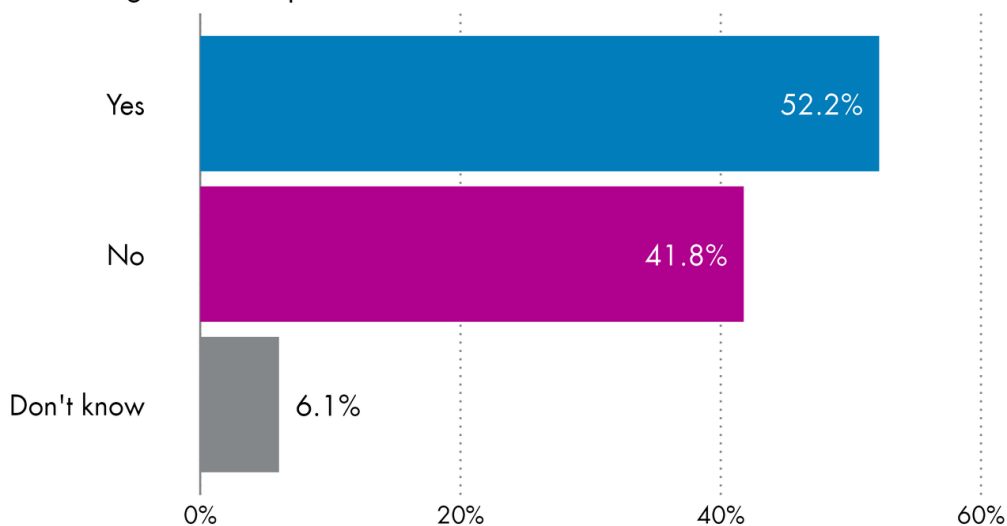
Those who **disagreed with the proposals** felt that:

- “Scottish SPCA is not the police force and granting them additional powers would be a dangerous precedent and one which could be abused”
- “Police Scotland have sufficient powers and training to undertake investigations regarding wildlife crime.”
- “The Scottish SPCA staff aren’t vetted or trained to the same standard as the police officers, which would compromise wildlife crime investigations.”
- Some had “concerns about the SSPCA’s capacity to be impartial, and such powers should be retained by statutory bodies – not charities”.
- “Police Scotland should be properly funded to allow them to have the resources to investigate wildlife crime”
- The SSPCA already have “sufficient powers”

Q7. Do you agree there is a need for additional regulation for muirburn?

### Do you agree there is a need for additional regulation for Muirburn?

Percentage of all responses from Scotland



We received 3,409 responses to this qualitative question. 1,868 responses were received from respondents based in Scotland.

A summary of key words and phrases is outlined below:

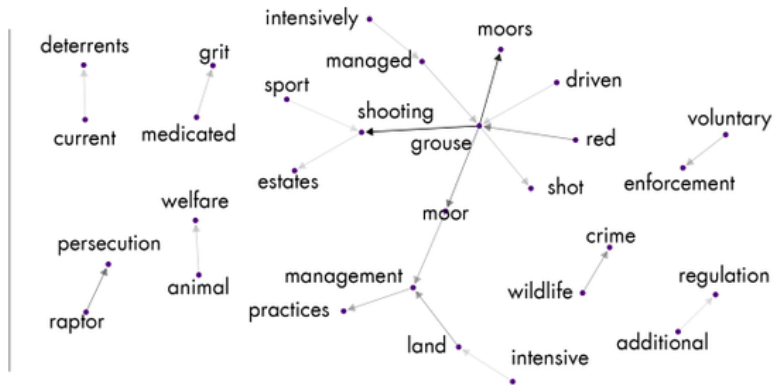
## Do you agree there is a need for additional regulation of land to be used to shoot red grouse?

Based on responses from Scotland

**Wordcloud** - shows the frequency of words used in responses

**Network maps** - shows the relationship between words used in responses.

### Agree



### Disagree



Those who **agreed with the need for additional regulation for muirburn** felt that:

- Muirburn should be “heavily regulated” due to the negative impact on wildlife.
- Muirburn causes “environmental devastation” with “tons of carbon released into the air, incineration of small creatures, nesting birds, and air pollution” “disturbing local wildlife”
- Additional regulations are required to address environmental concerns and “mitigate climate change” as “peatlands are a valuable carbon sink.” Muirburn “prevents peatlands from rewetting and sequestering carbon during the climate emergency.”
- “Peat in a degraded state emits carbon and muirburn prevents recovery”
- Muirburn reduces biodiversity

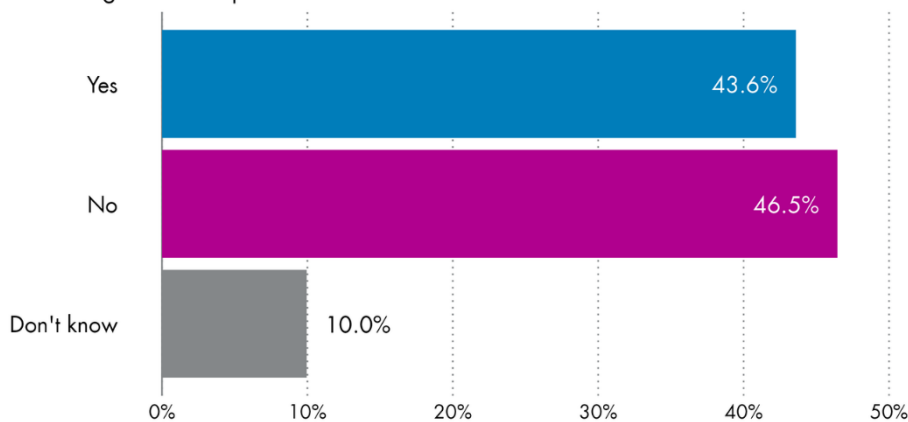
Those who **disagreed with the need for additional regulation for muirburn** felt that:

- “Gamekeepers understand muirburn better than most and have been doing so for years which keeps the damage from wildfires to a minimum and produces productive habitat for not only Gamebirds but a wide array of wildlife.”
- Muirburn can “promote new growth” of heather which can benefit biodiversity”
- “Muirburn remains an essential tool for moorland management... used correctly, it increase biodiversity, improve carbon sequestration and helps mitigate the risk of, and from wildfires”
- A campaign template response noted that “Muirburn is conducted with absolute professionalism and in accordance with best practice guidance by the vast majority of grouse moor managers. Training should be considered as a mechanism for maximising professional standards and adherence to best practice before further regulation is considered.”
- Current regulation is sufficient. “What is needed is better enforcement of current legislation”.

Q8. Do you agree with the proposed licensing system for muirburn (sections 9-19)?

**Do you agree with the proposed licensing system for muirburn (sections 9-19)?**

Percentage of all responses from Scotland



We received 3,105 responses to this qualitative question. 1,696 responses were received from respondents based in Scotland.



Those who **disagreed with the proposed licensing system** felt that:

- Licensing is “not required” as there is “sufficient” “legislation is already in place”
- Existing regulations have “worked well for years. Best not to interfere when something already works well.”
- The proposals are an example of “bureaucracy” and “increased government interference”
- Landowners and land managers should be free to “do their jobs”
- A campaign template response noted that “The usage of the ‘40cm’ arbitrary peatland depth figure lacks scientific reasoning since peatland itself is not burned during muirburn”.
- It would not be “possible to measure the depth of peat across a large area of land, it's not practical”.
- (As above) a number of respondents indicated that they would prefer an outright ban on muirburn, and therefore do not support licensing in any form