



Llywodraeth Cymru
Welsh Government

Summary of responses to targeted stakeholder consultation and call for evidence on glue traps

A target stakeholder consultation was conducted between November 2021 and January 2022. This document represents a summary of the responses received.

Stakeholders consisted of:

1. Animal welfare organisations that have expressed a view on glue traps
2. Representative bodies for professional pest controllers
3. Local Authorities

A full list of organisations is included at the end of the summary

Part I: Questions to Animal welfare NGOs and pest control industry bodies

1. Do you regularly use glue traps? How many and how often?

The two representative bodies for pest controllers reported that some of their members use glue traps. The British Pest Control Association quantified this from a sample of 404 members across the UK who use glue boards at: daily 6 per cent; monthly 30 per cent; quarterly 18 per cent; yearly 16 per cent; less than once a year 3 per cent; and never 3 per cent. Information on how many of the respondents operate in Wales was not included.

The RSPCA responded that although the use of glue traps is prohibited within their own premises, they received 7 reports of animals in distress due to glue traps in Wales between 2016 and 2021 and 270 total reports across England and Wales during the same period.

2. What specific circumstances require the use of glue traps as the only viable pest control method? What alternative methods of pest control are there?

Both pest control bodies consider glue traps as an essential part of their toolkit – a toolkit they contend has been shrinking due to a reduction in legal rodenticides. The NPTA cites the industry's voluntary Code of Practice which states that glue traps should only be used where there is (a) an imminent risk to public health, or (b) where all other methods have proved to be ineffective.

Evidence of growing resistance to elements that make up the majority of rodenticides is another reason pest controllers argue for the continued use of glue traps - specifically for professionals (they agree that the public should not be permitted to use them). The BPCA states that animal welfare is a central concern for its members and forms one of a

number of factors when determining the best method to use. 50% of their members have used glue traps in pubs, clubs and restaurants, with supermarkets and food stores following closely on 47% and care homes and schools both on 24%. 30% had used them in office buildings but no information was given as to what the imminent risk to public health was in those situations. An assessment (below) by the BPCA of various methods demonstrates that glue traps are the only method that can meet all four criteria.

	Tools available					
	Proofing	Denial of food and water	Removal of harbourage	Trapping	Biocides	Glue (sticky) boards
Can be used after an infestation has occurred	x	x	x	✓	✓	✓
No chance of secondary poisoning	✓	✓	✓	✓	x	✓
Instantly dispatches rodents	x	x	x	✓	x	— Boards are not designed to kill rodents. Boards are checked no less than every 12 hours, and caught rodents are then humanely dispatched by the pest professional
Quick to combat infestation	x	x	x	— Rats are naturally suspicious of new things and often avoid newly set traps for some time	x	✓ Boards can be placed where rodents must travel for food, water and harbourage

The BVA and BVZS recognise that there is public health justification and indeed a legal obligation placed upon local authorities in the Prevention of Damage by Pests Act (1949) to control rodents, however they contend that as glue traps are an inhumane method of trapping and killing rodents, as set out in evidence, alternative methods should be used in all circumstances.

The animal welfare bodies were united in this view that there are no circumstances whereby glue traps can be said to be the only viable method, and that in fact sufficient alternatives exist which render the use of glue traps as unnecessary. Alternatives such as rodenticides, (certain) snap traps, and live capture traps (for live release or mechanical killing) were cited as being significantly more humane. Several studies were put forward (listed at the end of this summary) as to the benefits and humaneness of these various methods, and to their appropriateness in different scenarios.

The prevention of rodent infestation and the method of exclusion were also put forward as essential elements in pest control.

Glue traps were cited as being the worst method both in terms of their humaneness and because they frequently capture non-target species – with three out of four animals in glue traps the RSPCA responds to being non-targets such as other wildlife, including bats and hedgehogs, and domestic pets such as parrots and cats. The circumstances of their capture, and the injuries they have sustained, often means the animal requires euthanasia. The RSPCA also suggests these are glue traps which are set by both amateurs and professionals.

Glue traps may be more attractive to users because they are a very cheap option and could be considered to be officially approved of given they are readily available to buy and often have misleading packaging re being 'non-toxic' and easy to use. This supported the arguments put forward by all stakeholders, including the BPCA and NPTA, for a ban on the general public using them. However, animal welfare organisations claim the evidence strongly supports a ban for pest controllers also.

Although some organisations recognised an argument has been put forward that glue traps are reserved for significantly high-risk situations where there is a threat to public health and thus where speed is a priority (e.g., hospitals), they argue the likelihood of suffering is such that there should be no circumstances where their use can be justified. Moreover, the report by the Scottish Animal Welfare Commission drew attention to the fact that glue traps may not always be reserved for the exceptional cases and may well be in general use by some operators. The RSPCA suggests that whilst glue traps were initially favoured in situations where poisons were considered unacceptable such as food preparation areas, their use has grown and expanded into other scenarios.

Attention was also drawn to the label of 'pest' control and how this may negatively influence approaches to managing the numbers of these species and when there is an ingress into human environments. The contention is that less humane methods have been sanctioned or been deemed acceptable despite evidence that the welfare of these animals is compromised in a way that would not be tolerated for a more 'valued' species. OneKind emphasised this by pointing to the inherent bias in our systems against animals who have been deemed as 'pests' and therefore afforded less consideration. When a story emerges of a pet animal caught injured or killed by a glue trap the reaction is usually much stronger than for a rat.

3. Are these alternative methods of pest control effective?

[Both pest control bodies considered they have answered this within number 2 above]

The animal welfare organisations answered yes to this question. UFAW acknowledged that alternatives can lack the immediacy of glue traps, although noted that those nations with a ban are able to manage with only those alternatives available to them.

Emphasis was once again placed on the need to prevent rodent ingress from occurring as well as the need to challenge the notion of what constitutes a pest and how the welfare of all animals can be more equally protected. Where an infestation must be tackled, the Born Free Foundation suggests two principles should be central, namely to 1) affect no more animals than necessary to achieve the aim, and 2) refine control methods to minimise unnecessary suffering (pain and distress). It is argued that ethical

principles should underpin decision making when justifying targeting a species with any control method, in order to minimise negative impacts.

The RSPCA also noted some of the welfare concerns with alternatives, which are not insubstantial. Again, the emphasis in these responses was on non-lethal methods such as preventing access, removing food sources, and increasing human activity, which they suggest can be more effective particularly in the long term.

4. What repercussions would there be if glue traps were not available as a method of pest control?

Pest control bodies offer a list of the wide variety of locations where rodents pose a significant risk to human health, due to the various diseases they can transmit, as evidence of the repercussions of a ban on glue traps. And it is argued that in situations where it is proving difficult to capture the rodents, the people within that environment will be under significant pressure, placing their mental and physical health at risk.

The NPTA cites evidence that 93% of house mice carry a resistant gene and 61% of rats carry at least one rodenticide resistant gene, as an argument for not removing glue traps as an alternative given the number of other methods, and their efficacy, is already under threat.

In contrast the animal welfare organisations suggest the repercussions are positive in that animal welfare standards will be much improved. The Born Free Foundation cite evidence that there is no entirely humane way of removing rats, but where lethal control is deemed necessary, the impacts can be minimised through selecting the right method for the situation and using it correctly, as the evidence on welfare suggests. It is also recognised that this area of research would benefit from more funding to determine better methods, not least of all deterrents (also strongly recommended by the BVA and BVZS). It was also suggested that in countries such as Ireland, New Zealand and parts of Australia, a ban on glue traps has led to no decline in animal welfare and should Wales follow suit this could only have positive consequences for animals.

The types of injuries and suffering of animals caught in glue traps was explored in the submissions in some detail – when animals attempt to break free, skin and fur is often torn and bones are broken, and they can chew through their own limbs. Even where the voluntary code for professional users is adhered to these traps need only be checked every 12 hours, but non-professional users may well be leaving them longer, during which time the animal can endure great pain and distress. They can perish through lack of food and water and suffer severe exhaustion. Some have slowly drowned in the glue. The Wild Animal Welfare Committee added that trapped animals can be attacked or predated upon by carnivores and in their view the mental and physical suffering caused by this should be considered doubly indefensible. This is also not limited to target species, as mentioned earlier.

5. What would be the economic and social implications?

The evidence surrounding the diseases rodents carry, and how transmissions may be more likely if the various methods of control are reduced, is once again suggested by pest control bodies to be compelling. Some of these diseases can cause significant

mental and physical harm, and can even prove fatal, to humans. For those where such an illness prevents them working this can cause additional economic hardship. It is also suggested that some businesses, for instance in the food sector, may have to close for longer periods of time if glue traps are banned as other methods can take significantly longer. The frequency of this happening or the estimated costs to individuals or society may be unknown as they were not supplied.

In contrast the animal welfare organisations suggest a ban on glue traps would better reflect the expectations and values held by the public in Wales and could lead to social benefits. Campaigns by animal welfare organisations and individuals has seen large scale support with one change.org petition reaching over 75,000 signatures. The Humane Society International UK (HSI) quote a YouGov poll in 2015 which found only 9% of respondents opposed a ban on glue traps. It is suggested that banning glue traps as a means of capturing rodents can signal how ineffective and inhumane they are, and aid a shift in attitudes towards these sentient creatures including how to deal with, or prevent, rodent ingress. A ban would better reflect a society that considers such forms of pest control unacceptable.

There is a concern that many members of the public may not understand how to use glue traps correctly or how a captured animal must then be handled and killed (it is highly unlikely the animal can be safely and humanely freed from the glue trap to be released unharmed elsewhere), and therefore the glue trap may just be thrown away with the live animal still attached. Many people may also not understand that to do so could constitute a criminal offence under the Animal Welfare Act 2006, leaving them open to prosecution. They may also be committing an offence if they are not able to kill the animal humanely which may frequently be the case if they do not have knowledge and skills to do this. One YouGov poll (for HSI) found that over half of the respondents either would not know what to do with a trapped live animal or would recommend an action such as drowning, which would be illegal, and only 20 per cent knew the preferred, and legal, method of striking the animal with a sharp blow to cause instant death.

Handling an animal in a glue trap also brings the user into close contact with the animal (through a bite, or via urine or faeces, which can also be a stress response), which poses a much-increased health risk.

It was also argued that there is an environmental cost to using glue traps because they cannot be reused and need to be disposed of appropriately (given they consist of non-drying glue) – some of the alternative methods can therefore offer greater environmental benefits.

6. Glue traps have been banned in other countries (e.g., Ireland and New Zealand). Are you aware of any negative impacts this has had there on pest control?

The BPCA believe that the situation in New Zealand is not comparable given they experience very different pest issues, and it should be noted professional pest controllers can still use glue traps. The NPTA agree that the evidence is unclear but that any reduction or limiting of methods can only have a negative effect on public health.

The animal welfare sector responded to state they are not aware of any negative impacts. UFAW argue that it is notable that other countries have banned or significantly restricted glue trap use without encountering insurmountable rodent infestations. The

Born Free Foundation point to countries where a strict licensing approach has been adopted, the number of applications for such licences has been limited which suggests that alternative methods of rat control have been adopted with good effect. The number of licences in New Zealand has fallen since the scheme's introduction, from 24 in 2015, to four in 2020, (along with the total number of glue traps sold under Ministerial approval falling from 24,564 in 2015 to just 48 in 2019) which may be evidence that alternatives are working.

There is a suggestion that the Government in Ireland believed the general public may not have been wholly aware that glue traps are not a permitted method of pest control there and as such it was recommended that the ban in Wales be accompanied by an awareness-raising campaign particularly if it will remain legal to sell or purchase glue traps.

HSI drew attention to Iceland as the latest country to adopt a ban in December 2021, with authorities there citing Article 28 of the Animal Welfare Act, which prohibits the use of methods that cause unnecessary entrapment or pain. They also reference the ban in Victoria Australia which had initially permitted use by professional pest controllers but has recently removed this exemption thus prohibiting sale, setting and use of all glue traps that are capable of trapping an animal. HSI suggest animal welfare; compliance; and enforcement concerns were the reasons for this.

7. What evidence are you aware of that glue traps are either a humane or inhumane method of pest control.

The BPCA believes that glue traps are as humane as any other method when in the hands of a professional pest controller. The NPTA acknowledges that glue boards have the capacity to cause suffering however they contend that the elimination of rodents, for public health and safety reasons, is of greater concern. Both pest control bodies refer to the industry's voluntary code of practice which amongst other conditions requires a trap to be checked, as a minimum, every 12 hours (the issue of how to ensure the code is being adhered to in most circumstances isn't addressed). In contrast there is anecdotal evidence that glue traps are frequently used where immediate dispatch occurs – which requires pest controllers to stay on site. This would reduce the length of time the animal may suffer however it is not clear how practical this may be particularly from an economic perspective for the pest controller.

There is unison amongst welfare organisations and a strong view that glue traps are one of the most inhumane methods of pest control that currently remains legal in Wales. The BVA, BVZS and Wild Animal Welfare Committee note that the use of a similar technique for the capture for birds (bird lime) is already prohibited under the Wildlife and Countryside Act 1981 (WCA).

The nature of non-target captures and how glue traps are inherently indiscriminate was raised by many organisations. Cats Protection cite the free roaming nature of cats and how they are, as a result, particularly vulnerable, as case studies have shown, to falling victim to a glue trap. They not only suffer terrible injuries from being caught but also potentially a long, painful death if they are not discovered in time. As they are much larger than rodents, cats may become stuck in multiple traps (one case study suggested four for one unfortunate cat) thus sustaining even more injuries, and they may also be able to move a short distance out of sight and lay injured and undetected.

A number of research and scientific papers were cited to illustrate a strong evidence base on the nature of suffering that animals experience as a result of becoming caught in a glue trap (these have been listed, along with references supplied by others at the end of this summary document). Some of these studies have found that although certain control methods can be considered humane when used correctly, glue traps must always be considered inhumane due to the length of time the animal can suffer before being killed. This was supported by another study which found between 84 and 85% of rodents remain alive 24 hours after being caught in a glue trap.

Several case studies were also submitted, along with photographs, to illustrate the nature of suffering and the extensive range of animals that have fallen victim to glue traps which supports the argument they are inherently indiscriminate.

8. Are you aware of any research on the cost and benefits of glue traps either in the UK or abroad?

Neither pest control body supplied research or statistics on the costs and benefits of glue traps for pest control, but both reiterated their importance as part of the professional pest controller's toolkit. The BPCA referred to 'hundreds' of case studies where glue traps have been used to avoid business and organisations - including hospitals, care homes, airports, and government buildings - from being temporarily closed while a rodent problem is dealt with. Some specific case studies relating to i) a bakery in Welshpool, ii) a farmhouse in Llansantffraid, iii) multiple takeaways and restaurants in Cardiff, iv) a hospital kitchen in Gwent, and v) a housing association in Monmouth, were submitted at a later date. Should a ban be brought in, the BPCA predicated 'thousands of sensitive sites' could be at risk of 2+ week disruptions and even closures.

The animal welfare sector cited the cost benefit analysis produced in 2005 as part of the State of Victoria's ban in Australia which concluded that 'the expected costs of the proposed regulations [to ban the use and sale of glue traps] are outweighed by their expected benefits, especially to animal welfare'.

9. Would you support a full ban on glue traps? Why / Why not?

The pest control organisations fully support a ban on the general public using glue traps but maintain that they form an essential part of the professional pest controller's toolkit and should remain so.

The BPCA cites the industry standard qualifications and the Continuing Professional Development Scheme as reassurance on the ability of pest controllers to use glue traps appropriately. All their members are assessed to the BS EN 16636 Standard for Pest Management and must pass an audit to remain in membership.

In contrast HSI cite a concern about the current lack of any formal or legal definition of a 'professional' operator and the voluntary nature of the industry code which they say raises questions about any assurances regarding competency. They claim the pest control industry has acknowledged it has no authority or control over users. HSI's concerns extend to the industry code of practice itself which they argue isn't constructed

with acceptable animal welfare outcomes as its focus – with the 12-hour check on traps requirement used as an illustration.

The animal welfare sector supports a full ban on the use of glue traps, with some urging this to extend to sale (whilst acknowledging the constraints of the UK Internal Market Act). It is argued that little can be done to mitigate the severe suffering glue traps causes which therefore justifies banning their use in all circumstances.

The RSPCA also urges a consideration of the wider trapping regime, including Larsen traps, as part of a wholesale consolidation of Wales' wildlife law, which, in many parts, they argue remains antiquated and inaccessible.

Part II Questions to Local Authorities in Wales

1. Does your Local Authority have an in-house pest control team or do you use contractors?

All local authorities that responded have an in-house pest control team

2. Where might your LA respond to pest control calls - hospitals? Schools? Council offices/property? Housing? Etc.

Some local authorities only perform pest control services for local authority properties, but they will also offer advice to those in the private sector. Others have contracts such as with commercial businesses, housing, or schools. And some offer a paid-for service to a full range of private and commercial premises.

3. Do you have a policy on what lethal control methods can be used?

Local authorities in Wales do not have a policy as such on what lethal controls they will use (or permit contractors to use) however they have understood practices which requires maintaining standards through regular training, a code of practice, and risk assessments.

4. Do your pest control services regularly use glue traps?

Two local authorities responded to state they never use glue traps and two only in extremely limited circumstances. Shared Regulatory Services (minus Cardiff Council which responded separately) will use them to catch a rat in a domestic property while the Pest Officer remains present.

5. If so, how many, how often? (or what proportion do they represent)

Of the two local authorities that rarely and only in extremely limited circumstances use glue traps, one responded to say they had not been used in the last year, and the other responded to say on average around 3-4 times per year which is less than 1% of incidents. Shared Regulatory Services (minus Cardiff Council which responded separately) estimated they use glue traps for rodents about a dozen times a year.

6. If you don't use them, why not?

Three local authorities responded to say glue traps are considered inhumane. They are also deemed to be labour intensive and one local authority stated that they don't have the necessary resources to provide the regular checks that glue traps require.

7. What specific circumstances require the use of glue traps as the only viable pest control method? What alternative methods of pest control are there?

One local authority that uses glue traps stated that they would never be considered the only viable method but on the rare occasion they are used it would be as a supplementary method to help obtain a quicker result. Another responded to say glue traps are considered for us where all other methods are ineffective and the rodent poses sufficient risk – an example of an extremely vulnerable person with limited mobility, where other methods had repeatedly failed was provided.

8. Are these alternative methods of pest control effective?

The local authorities that responded to this question agreed that alternatives are effective for the vast majority of the time but noted that in some cases can be slower to work. One is exploring testing a new, fast-acting rodenticide.

9. What repercussions would there be if glue traps were not available as a method of pest control?

Three local authorities responded to say there would be no repercussions from a ban on glue traps. One responded to say that there would be a significant public health risk to the occupants of premises.

It was also noted that glue traps should remain an option for the control of fleas and cockroaches to avoid exposure to insecticides.

10. What would be the economic and social implications?

Three local authorities stated there would be no economic or social implications although one notes that food premises may need to remain closed for a longer period and schools may have to buy in services. One stated that some businesses could

become overrun in some circumstances, and another noted that there may be considerations for frontline health care providers.

11. What evidence are you aware of that glue traps are either a humane or inhumane method of pest control?

All local authorities acknowledge glue traps are inhumane, with the evidence coming from, training courses (such as Killgerm), from organisations like the RSPCA, and based on the knowledge of unnecessary suffering which occurs. Shared Regulatory Services, which is the greatest user of glue traps amongst the local authorities that responded, stated that they are inhumane for rats if left for this purpose, unattended. Pembrokeshire stated that undue suffering cannot be justified however they believe this must be balanced against the risk of disease to the population.

12. Are you aware of any research on the cost and benefits of glue traps either in the UK or abroad?

No local authorities were aware of any such research.

13. Would you support a full ban on glue traps? Why / Why not?

Three local authorities responded to say they support a ban with one stating glue traps are not required. One suggested that glue traps should be available only under permitted use (as in the case of bird control) to ensure all reasonable means have been first exhausted though it was noted that application delays could make this challenging in a time-sensitive situation. Shared Regulatory Services (in this case not representing Cardiff) stated that they do not want to see a ban and when used correctly glue traps can have a purpose over other methods.

14. How much do you spend on pest control?

Most local authorities were unable to provide this information and one noted that there are challenges to the calculation given some of the costs are off set in many cases by the income from the services provided. They also balance the value of the costs if services are outsourced against those provided in-house.

List of respondents:

Pest control bodies:	
British Pest Control Association	National Pest Technician Association
Animal welfare organisations:	
OneKind	British Veterinary Association & British Veterinary Zoological Society
RSPCA	Universities Federation for Animal Welfare
Cats Protection	Humane Society International UK
Born Free Foundation	Wild Animal Welfare Committee
Local authorities in Wales:	
Shared Regulatory Services – for Bridgend County Borough Council, Cardiff Council and the Vale of Glamorgan Council	Carmarthenshire County Council
Caerphilly County Borough Council	Cardiff Council
Pembrokeshire County Council	

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Version	Date published	Section changed	Reason for change
V1	28 Sept 2022		
V2	29 Nov 2022	Summary of responses to Q.7. (P.6)	Minor correction to a typing error in the English language version only – description originally stated <i>illegal</i> when it is <i>legal</i> (in 2 nd paragraph).