

BVA and BVZS position on the use and sale of rodent glue traps

Introduction

BVA and BVZS consider that glue traps are an inhumane method of trapping and killing rodents and should be replaced by alternative methods of rodent control.

We recognise that it may be necessary to control or eradicate rodents due to their negative impacts on human and animal health, food, agriculture, property and the environment.^{1 2} Indeed, in the UK, there is also a legal obligation, as set out placed on local authorities in the Prevention of Damage by Pests Act (1949) to control these species in some circumstances.³

The methods used to control rodents are, however, controversial, due to their impact on animal welfare^{4,5,6} and this is especially so in the case of the use of glue traps.⁷

Glue traps significantly compromise animal welfare for the period during which animals are trapped, and there are welfare concerns associated with methods of killing of trapped animals. Glue traps are also indiscriminate and may capture wild and domestic species for which their use is not intended.

We are therefore calling for:

- An outright ban on the use and sale of glue traps, applying to both the general public and pest control professionals;
- If the use of glue traps by pest control professionals is still to be permitted, UK governments should introduce strict legislative control for limited use of glue traps by individual pest control professionals in exceptional circumstances eg. through training, licensing and close monitoring;
- Ethical use of pest control, with a focus on integrated pest management (IPM);
- Further research to develop alternative methods for the deterrence of rodents and where necessary, more humane methods of killing.

Ethical use of pest control

We recognise that it may be necessary to control or eradicate rodents due to their negative impacts on human and animal health, food, agriculture, property and the environment.⁸ Where pest control is required, we support the ethical use of pest control methods, which first requires consideration of whether it is necessary control pests at all, and second, whether it is necessary to kill them for control.

¹ Meerburg BG, Brom FWA and Kijlstra A, 2008. The ethics of rodent control. *Pest Management Science*, 64, 1205–1211.

² BVZS Position statement on the control of free-ranging wildlife. Available at: <https://www.bvzs.org.uk/wp-content/uploads/2021/03/BVZS-Position-Statement-on-the-control-of-Free-ranging-Wildlife-Final-Feb-2021.pdf>

³ <https://www.legislation.gov.uk/ukpga/Geo6/12-13-14/55/contents>

⁴ Mason G and Littin K, 2003. The Humaneness of Rodent Pest Control, *Animal Welfare*, 12, 1-37

⁵ Meerburg BG, Brom FWA and Kijlstra A, 2008. The ethics of rodent control. *Pest Management Science*, 64, 1205–1211.

⁶ Yeates, J. 2010. What can pest management learn from laboratory animal ethics? *Pest Management Science*, 66, 231–237.

⁷ Fenwick, N., 2013. Evaluation of the humaneness of rodent capture using glue traps, prepared for the Canadian Association of Humane Trapping, 31 July 2013. Available at: <http://www.caht.ca/evaluation-of-the-humaneness-of-rodent-capture-using-glue-traps/>

⁸ Meerburg BG, Brom FWA and Kijlstra A, 2008. The ethics of rodent control. *Pest Management Science*, 64, 1205–1211.

^{9, 10, 11} Before lethal control is considered, change in human behaviours should be implemented, and if lethal control is considered necessary, methods that minimise suffering, fear and pain should be used.
^{12, 13} [Read the BVZS Position statement on the control of free-ranging wildlife in full.](#)

With these considerations in mind, we support the use of integrated pest management (IPM)^{14, 15}, which consists of following the below steps:

- 1) Prevention (the exclusion of rodents and carefully managing environments to prevent them becoming attractive to rodents);
- 2) Monitoring (to assist in pest control decision-making), and
- 3) Control (killing)

Recommendation 1: Pest control methods should be used ethically, with a focus on integrated pest management (IPM).

Use of glue traps

Glue traps (glue boards, sticky boards) are a flat surface or shallow tray with a non-drying adhesive applied to one side, for the purposes of trapping small animals considered to be pests, such as mice and rats. An animal touching the glue becomes stuck and attempts to break free result in increasing amounts of adhesion to the board. The trapped animal can then be killed. Glue traps are very cheap and non-toxic to the user and the local environment (eg food preparation/packaging area).

Alternatives to using glue traps include removing rodent food sources, adequate human and animal food storage, live traps, instant kill traps and anticoagulant poisons.

Animal welfare concerns relating to glue traps

Due to the nature of glue traps and the duration of time animals may be trapped, the potential negative animal welfare impacts are significant and may include^{16,17}:

- dehydration;
- hunger;
- distress;
- torn skin;
- broken limbs;
- hair removal;
- suffocation;
- starvation;
- exhaustion; and

⁹ Yeates, J. 2010. What can pest management learn from laboratory animal ethics? *Pest Management Science*, 66, 231–237.

¹⁰ Dubois S, Fenwick N, Ryan E, Baker L, Baker S, Beausoleil N, Carter S, Cartwright B, Costa F, Draper C, Griffin J, Grogan A, Howald G, Jones B, Littin K, Lombard A, Mellor D, Ramp D, Schuppli C and Fraser D, 2017. International consensus principles for ethical wildlife control. *Conservation Biology* 31: 753-760.

¹¹ BVZS Position statement on the control of free-ranging wildlife. Available at: <https://www.bvzs.org.uk/wp-content/uploads/2021/03/BVZS-Position-Statement-on-the-control-of-Free-ranging-Wildlife-Final-Feb-2021.pdf>

¹² UFAW, 2008. Guiding principles in the humane control of rats and mice. <https://www.ufaw.org.uk/rodent-welfare/rodent-welfare>

¹³ Dubois S, Fenwick N, Ryan E, Baker L, Baker S, Beausoleil N, Carter S, Cartwright B, Costa F, Draper C, Griffin J, Grogan A, Howald G, Jones B, Littin K, Lombard A, Mellor D, Ramp D, Schuppli C and Fraser D, 2017. International consensus principles for ethical wildlife control. *Conservation Biology* 31: 753-760.

¹⁴ Traweger, D., Travnitzky, R., Moser, C., Walzer, C. & Bernatzky, G. 2006. Habitat preferences and distribution of the brown rat (*Rattus norvegicus* Berk.) in the city of Salzburg (Austria): implications for an urban rat management. *Journal of Pest Science*, 79, 113–125.

¹⁵ Meerburg BG, Brom FWA and Kijlstra A (2008). The ethics of rodent control. *Pest Management Science*, 64, 1205–1211.

¹⁶ Frantz SC and Padula, CM, 1983. A laboratory test method for evaluating the efficacy of glueboards for trapping house mice. In: *Vertebrate Pest Control and Management Materials: Fourth Symposium*, (Ed. by D. E. Kaukeinen), pp. 209–225. Philadelphia, PA: American Society for Testing and Materials.

¹⁷ Mason G and Littin K, 2003. The Humaneness of Rodent Pest Control, *Animal Welfare*, 12, 1-37

- self-mutilation.

Notably, the use of a similar technique of capture for birds (bird lime) is prohibited under the Wildlife and Countryside Act 1981 (WCA).

The speed at which welfare is affected in a struggling rodent is rapid (minutes) and yet suffering and death can be prolonged (3-24 hours).¹⁸ In many instances animals remain alive for more than 24 hours after capture.¹⁹ We are also concerned that the recommended low frequency of checking traps, as set out in the Pest Management Alliance voluntary [Code of Practice On the Use of Glue Boards](#), has the potential to result in considerable suffering. The Code recommends that glue traps are inspected at appropriate intervals to minimise the amount of time animals spend in the trap and/or free non-target species this should be within 12 hours of placing, or at least as soon as is reasonably practicable, and they should be revisited at a minimum of every 12 hours.

Further, instructions for glue traps frequently fail to explain the need to kill the trapped rodent or examples of how to do this humanely. A blow to the head is often recommended to result in instant death, however it is questionable whether members of the public would be willing or able to do this effectively. Evidence gathered in the Scottish Animal Welfare Commission (SAWC) report into the use of rodent glue traps suggested that likely reasons for failure to kill rodents humanely included fear, health hazards and squeamishness. Notably, a YouGov surveyed 2000 British adults on behalf of Humane Society International in June 2015²⁰ and found that:

- More than half of the people surveyed said they either wouldn't know what to do with an animal caught on a glue trap or would recommend an action that risked committing an offence under the Animal Welfare Act (2006).
- The latter included 9% who said they would drown the animal and 6% who said they would leave the animal to die on the trap.
- Only 20% of respondents would recommend killing a trapped animal using the method advised by the professional pest control industry and regarded by experts as being 'humane' (hitting the animal with a sharp blow).

Glue traps can also be indiscriminate and may result in the capture and suffering of non-target species. Between 2015 and 2019, the RSPCA received 243 reports of glue trap incidents of which over 73% involved pets and non-target wildlife.²¹ Equally, where glue traps are used for target species other than rodents, for example invertebrates, it is reasonable to conclude that these will have similarly negative impacts on their welfare, and cause suffering.

When considered in the context of the Five Domains model for animal welfare assessment²², it is evident that the use of glue traps compromises several of the domains used to inform the overall picture of animal welfare, including Domains 3 (Health), 4 (Behaviour) and 5 (Mental state).

Alternatives to glue traps

Mason and Littin (2003) recognise that rodent control methods have a range of welfare implications, and that any given method has a range of effects, so may be more or less humane depending on dose, environmental and human factors.²³ Therefore, assessing the humaneness of alternatives to glue traps is complex and difficult. However, with these difficulties in mind, Mason and Littin do suggest five rodent control methods that they consider to be 'relatively humane.'

- **Deterrence and exclusion** – by means of rodent-proofing and good hygiene

¹⁸ Ibid.

¹⁹ Frantz SC and Padula, CM, 1983. A laboratory test method for evaluating the efficacy of glueboards for trapping house mice. In: Vertebrate Pest Control and Management Materials: Fourth Symposium, (Ed. by D. E. Kaukeinen), pp. 209–225. Philadelphia, PA: American Society for Testing and Materials.

²⁰ HSI, 2015. Inhumane, Indiscriminate, Indefensible: The case for a UK ban on rodent glue traps. Available at: <https://www.hsi.org/wp-content/uploads/assets/pdfs/hsi-glue-trap-report.pdf>

²¹ RSPCA, 2020. We're caring for a feral kitten rescued from a glue trap <https://www.rspca.org.uk/-/kitten-in-glue-trap>

²² Mellor DJ (2017). Operational Details of the Five Domains Model and Its Key Applications to the Assessment and Management of Animal Welfare. *Animals*, 7, 60

²³ Mason G and Littin K, 2003. The Humaneness of Rodent Pest Control, *Animal Welfare*, 12, 1-37

- **Well-designed snap traps** – these should kill extremely quickly if set appropriately and of good quality
- **Electrocution traps** – electrocution traps should be considered as one of the most humane methods of rodent control providing that they deliver an effective, instant stun
- **Cyanide gas (fumigant)** – cyanide gas can cause some discomfort but induces very rapid and painless loss of consciousness
- **Alpha-chloralose (bait poison)** – Alpha-chloralose may cause some discomfort but causes no serious pain or distress.²⁴

In addition, Mason and Littin also acknowledge that that the option of live-box trapping may be acceptable provided that traps are well-monitored so that no animal is trapped for long durations, and the despatch of trapped animals is rapid and humane.

Three further methods are considered by Mason and Littin as ‘less humane’, however not the worst of current methods. Mason and Littin highlight that existing evidence on the impacts of these methods urgently needs to be corroborated with detailed, published studies to ascertain their humaneness with more certainty.

- **Carbon dioxide** – This gas is potentially able to kill within minutes, however the gas is aversive and can sometimes take far longer than minutes to kill.
- **Phosphine gas** – This gas causes pain for a few hours, and also seems to cause no serious long-term harm to animals that survive sublethal doses.
- **Cellulose-based lethal food stuffs** – these are reported to cause signs of pain or illness for a few hours

Therefore, while the welfare concerns associated with glue trap use are significant, it is important to recognise that other methods of rodent control may also compromise welfare.^{25,26} With this in mind, it is paramount that additional research is carried out into the development of alternative methods for the deterrence of rodents, and, where necessary, more humane methods of killing.

Recommendation 2: Further research should be carried out to develop alternative methods of the deterrence for rodents and where necessary, more humane methods of killing.

Legislative context

Glue traps are currently legal to buy and use across the UK and readily available online for both pest control professionals and the general public. Indeed, in the UK, there is also a legal obligation, as set out placed on local authorities in the Prevention of Damage by Pests Act (1949) to control these species in some circumstances.²⁷

- **Use by pest control professionals** - The Pest Management Alliance voluntary [Code of Practice On the Use of Glue Boards](#) sets out that glue traps should be used as a last resort to protect public health when alternative methods of rodent control have failed, for example where rapid rodent removal is needed to prevent disease risk eg. on aircraft and/or where anti-coagulants cannot be used for reasons of human safety (e.g. food processing, hospitals).²⁸ However, in its report on the use of rodent glue traps in Scotland, the Scottish Animal Welfare Commission noted that: ‘[...]no evidence is

²⁴ It is important to note that we consider that bait poison is likely to cause pain and distress, and therefore does not necessarily represent a welfare improvement when compared to glue traps.

²⁵ Mason G and Littin K , 2003. The Humaneness of Rodent Pest Control, *Animal Welfare*, 12, 1-37

²⁶ Baker SE, Ayers M, Beausoleil NJ, Belmain SR, Berdoy M, Buckle AP, Cagienard C, Cowan D, Fearn-Daglish J, Goddard P, Gollidge HDR, Mullineaux E, Sharp T, Simmons A and Schmolz E. (in press) An assessment of animal welfare impacts in wild Norway rat (*Rattus norvegicus*) management. DOI number: 10.7120/09627286.31.1.005.

²⁷ <https://www.legislation.gov.uk/ukpga/Geo6/12-13-14/55/contents>

²⁸ https://archive2021.parliament.scot/S5_PublicPetitionsCommittee/Submissions%202017/PE1671E_Pest_management_Alliance.pdf

provided to back up the statement that glue traps are only used as a last resort and there is a likelihood that this is not always the case with some operators.”²⁹

- **Use by the general public** – Glue traps are currently freely available to the general public with no restrictions on their sale. marketing and packaging make their use appear to be simple and a good alternative to using ‘poisons’. Some of the larger hardware stores have however, stopped their sale following campaigns by welfare groups. ³⁰

Animals caught in glue traps are ‘under the control of man’ and therefore fall under the UK Animal Welfare Acts 2006. It is an offence under the UK Animal Welfare Acts to cause unnecessary suffering or to fail to meet the welfare needs of an animal under human control. Given the potentially severe welfare impacts on trapped animals that are outlined above, we therefore question whether it possible to use glue traps in compliance with the UK Animal Welfare Acts.

Tighter legislative controls

In the UK, there has been increasing support for tighter legislative restrictions on the use of glue traps from both the pest control industry and welfare charities, a public ban on the sale and use of these traps and others campaigning for a complete ban, including for use by the pest management industry.^{31,32}

A ban on the public sale and use of glue traps would go some way to reducing the animal welfare issues associated with them. Pest management industry representative bodies such as the British Pest Control Association support the restriction of glue traps so that they can only be purchased and used by trained professionals.³³ Limitations of regulation of this industry through the Pest Management Alliance voluntary [Code of Practice On the Use of Glue Boards](#), however raise concerns regarding the effectiveness of self-regulation. ³⁴

In Scotland, petitioning of the Scottish Parliament³⁵ recently led to a Scottish Animal Welfare Commission (SAWC) report considering the animal welfare issues surrounding the use of glue traps to control rodents and the potential introduction regulatory controls.³⁶ The SAWC report concluded that “there is no way that glue traps can be used without causing animal suffering” and set out that:

“The Commission believes that the animal welfare issues connected with the use of glue traps would justify an immediate outright ban on their sale and use. This is our preferred recommendation.”³⁷

However, the report also acknowledged that the Scottish Government might first implement a system of retaining trained operator/industry use under a statutory code/guidance or through licencing. The Scottish Government could then review the system’s effectiveness prior to introducing an outright ban.³⁸

²⁹ Scottish Animal Welfare Commission: Report on the use of rodent glue traps in Scotland. Available at: <https://www.gov.scot/publications/scottish-animal-welfare-commission-report-use-rodent-glue-traps-scotland/>

³⁰ HSI UK, 2015. Inhumane, indiscriminate, indefensible: the case for a UK ban on rodent glue traps <https://www.hsi.org/wp-content/uploads/assets/pdfs/hsi-glue-trap-report.pdf>

³¹ Ibid.

³² Scottish SPCA, 2017. Submission to Scottish Parliament Petition PE01671: Sale and Use of Glue Traps. Available at:

https://archive2021.parliament.scot/S5_PublicPetitionsCommittee/Submissions%202017/PE1671A_SSPCA.pdf

³³ https://archive2021.parliament.scot/S5_PublicPetitionsCommittee/Submissions%202017/PE1671E_Pest_management_Alliance.pdf

³⁴ Scottish Animal Welfare Commission: Report on the use of rodent glue traps in Scotland. Available at: <https://www.gov.scot/publications/scottish-animal-welfare-commission-report-use-rodent-glue-traps-scotland/>

³⁵ PE01671: Sale and use of glue traps. Available at:

<https://archive2021.parliament.scot/gettinginvolved/Petitions/gluetrap>

³⁶ Scottish Animal Welfare Commission: Report on the use of rodent glue traps in Scotland. Available at: <https://www.gov.scot/publications/scottish-animal-welfare-commission-report-use-rodent-glue-traps-scotland/>

³⁷ Ibid.

³⁸ Ibid.

International examples of stricter regulation

There is already a precedent for the regulation of glue traps in other countries, where the sale and use of these traps by the public is banned and use by pest control professionals prohibited in all but exceptional specific and limited circumstances. Where a strict licensing approach has been adopted the number of applications for such licences has reduced significantly or has not occurred at all. Examples include:

- **Ireland** - The Wildlife (Amendment) Act 2000 (Irish Parliament 2000)³⁹ allows for the approval and regulation certain traps under The Wildlife Act 1976 (Approved Traps, Snares and Nets) Regulations 2003⁴⁰; glue traps are not listed as approved traps. It is an offence to import, possess, sell, or offer for sale unauthorised traps. There is the provision for a glue trap use under ministerial authorisation (licence) but there are no records of such licences having been issued.
- **New Zealand** - The National Animal Welfare Advisory Committee (NAWAC) recommended a ban on the importation, sale and use of glue traps in 2000 and the resulting Animal Welfare (Glueboard Traps) Order 2009⁴¹ prohibits sale and use of glue boards for rodents from 1 January 2015⁴². Ministerial approval to sell or use rodent glue board traps can be granted where it is in the public interest and there is no viable alternative. The number of approvals are now small (low single figures) and falling year on year⁴³, suggesting alternative methods are being used.
- **Tasmania, Australia** - The Animal Welfare Act of Tasmania Amendments 2008 prohibit the use of glue traps, other than with Ministerial exemption.⁴⁴ A blanket exemption allows for use by licensed commercial operators complying with industry Guidelines for best practice.
- **Victoria, Australia** - Glue traps were banned from public use in 2008 and only permitted by ministerial approval for purchase and use by commercial pest controllers in commercial food manufacturing premises. The Prevention of Cruelty to Animals Regulations 2019 included an outright ban on the sale, setting and use of glue traps.

Outright ban on sale and use

In light of the above evidence, we support an outright ban on the use and sale of glue traps, including extending this ban to pest control professionals.

If the use of glue traps by pest control professionals continues to be permitted, the UK governments should:

- Introduce an immediate ban on the public use and sale of glue traps; and
- Introduce strict legislative control for limited use of glue traps by individual pest control professionals in exceptional circumstances eg. through training, licensing and specifying the frequency with which traps should be checked.

Animal welfare issues where glue traps are used by professional operatives could be mitigated to some extent by a system of training, licencing and monitoring. The animal welfare impacts of glue traps will be affected to some extent by how the traps are used, for example using the right sort of board for the target species, using boards only indoors, setting traps at the right time of year (autumn) and checking traps frequently. Close direct observation, remote observation via CCTV or similar, or use of pressure-activated alarm pads could also all be used to speed up the recognition and killing of trapped animals.

³⁹ Irish Parliament, 2000). Wildlife (Amendment) Act, 2000 (Act No. 38 of 2000)

<http://www.irishstatutebook.ie/eli/2000/act/38/enacted/en/print#sec42>

⁴⁰ Irish Parliament (2003). Wildlife Act 1976 (Approved Traps, Snares and Nets) Regulations 2003

<http://www.irishstatutebook.ie/eli/2003/si/620/made/en/print>

⁴¹ New Zealand Ministry for Primary Industries, 2009.

<http://www.legislation.govt.nz/regulation/public/2009/0316/5.0/DLM2439769.html>

⁴² New Zealand Ministry of Primary Industries (2015). <https://www.mpi.govt.nz/dmsdocument/8196-%202015-15-review-of-rodent-monitoring-and-control-methods-as-alternatives-to-glueboard-traps>

⁴³ New Zealand Ministry for Primary Industries, 2020. Update on Glueboard Trap Approvals

<https://www.mpi.govt.nz/protection-and-response/animal-welfare/traps-and-devices/>

⁴⁴ Humane Pest Control, 2006. <http://www.humanepestcontrol.com/files/tasmaniaglueboardsexemption.pdf>

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These efforts would undoubtedly increase cost, but as use of such traps should be specialised and exceptional, this should not be a limiting factor.

We support the SAWC recommendations that any licensing system should be time-limited and subject to review within three years of its introduction, with a view to ending the use of glue traps altogether following investigation of alternative approaches. Professional pest control companies should also be encouraged to invest in research and development aimed at the identification of additional humane methods that would replace the apparent need for glue traps.⁴⁵

The licensing regime should also specify the licensing requirements recommended by SAWC, including⁴⁶:

- Licences must be applied for by individual operators not companies (individual licences would ensure greater protection and accountability, particularly if they include conditions pertaining to record-keeping and reporting. The application process could be designed to include training and accreditation from an approved body.)
- Licences must only apply to a single location where there is a significant risk to public health.
- Licences must only be situation-specific (referring to a particular incursion).
- Licences must be time-limited and not open-ended.
- Licences must only be granted where clear evidence of a 'cascade' of use of alternative methods can be demonstrated. Documentation of such a cascade of use should be a prerequisite of a licence application
- Licences must require operators to implement mechanisms to reduce the time between capture and humane destruction to the minimum, ideally by use of remote monitoring methods to ensure immediate attendance at the trap site.

Recommendation 3: The UK Governments should introduce an outright ban on the use and sale of rodent glue traps.

Recommendation 4: If the use of glue traps by pest control professionals is still to be permitted, the UK governments should:

- **Introduce an immediate ban on the public use and sale of glue traps;**
- **Introduce strict legislative control for limited use of glue traps by individual pest control professionals in exceptional circumstances eg. through training, licensing and specifying the frequency with which traps should be checked.**

Recommendation 5: Any licensing system for pest control professionals should be time-limited and subject to review within three years of its introduction, with a view to ending the use of glue traps altogether. Professional pest control companies should also be encouraged to invest in research and development aimed at the identification of additional humane methods that would replace the apparent need for glue traps.

⁴⁵ Scottish Animal Welfare Commission: Report on the use of rodent glue traps in Scotland. Available at: <https://www.gov.scot/publications/scottish-animal-welfare-commission-report-use-rodent-glue-traps-scotland/>
⁴⁶ Ibid.