

Proposal to prohibit the sale and use of rodent glueboard traps

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1. Executive Summary

In 2000 the National Animal Welfare Advisory Committee (NAWAC) recommended to the Minister of Agriculture that the importation, sale and use of glueboards be prohibited in New Zealand. Glueboards are traps consisting of a non-drying adhesive attached to a flat surface or contained in a shallow tray. In New Zealand they are used as a method of pest control in commercial, residential and conservation settings. NAWAC's recommendations were based on the degree of pain and distress experienced by captured rodents, the length of time animals may be left on the traps, and the potential for the inhumane disposal of live captured animals.

In December 2002, the Ministry of Agriculture and Forestry (MAF) released a public discussion document that analysed NAWAC's recommendations against criteria in the Animal Welfare Act 1999 that the Minister needs to take into account before deciding whether to prohibit or restrict a trap. The December 2002 discussion document did not contain detailed proposals for change.

This paper outlines the issue and options as well as MAF's proposed policy changes for the sale and use of rodent glueboards. It is proposed that a regulation is made under section 32(1) of the Animal Welfare Act to prohibit the sale and use of glueboards over a five-year period. Any person will only be allowed to use or sell a prohibited trap with the Minister's approval. The Minister may approve a person to use a glueboard in a specified situation or for a specific purpose, and set conditions on that use, if the Minister considers that the matter is in the public interest and alternative methods are either not available or not feasible.

The recommendations in this paper describe the intent of the policy and the exact wording may not necessarily be that used in any new regulation.

MAF invites submissions on the proposals presented in this paper. The closing date for submissions is **Friday, 31 October 2008**. Depending on the outcome of this consultation, MAF expects a regulation to be in effect by 1 July 2009.

Recommendation 1: Use of glueboards prohibited

- 1a. From 1 July 2009 the use of glueboards is prohibited in any place, other than those places referred to in recommendation 1b.
- 1b. A glueboard may be used in the following places until 1 July 2014:
 - i) specific areas or rooms inside food production premises, where there is a high risk of contamination;
 - ii) a glueboard may only be used in these places if there is a requirement by law to operate under conditions of strict hygiene, where poisons, attractants, baits and other potential contaminants cannot be used.

Recommendation 2: Sale of glueboards prohibited

No glueboard may be sold to:

- i) any person other than a commercial pest control operator or an operator of premises referred to in recommendation 1b from 1 July 2009;
- ii) any person from 1 July 2014.

Recommendation 3: The Minister may approve a person to use or sell an otherwise prohibited glueboard

The Minister may approve a person to use or sell, in a specified situation or for a specified purpose, a glueboard that would otherwise be prohibited under recommendation 1 or 2, and may set conditions on that use or sale if the Minister considers that:

- i) the matter is in the public interest (including for biosecurity, conservation, human health, animal health, food safety and food quality purposes); and
- ii) no viable alternative is available or feasible given the circumstances.

2. Introduction

This document outlines policy recommendations for the regulation of glueboards. It is proposed that a regulation is made under section 32(1) of the Animal Welfare Act 1999 (the Act) to prohibit the sale and use of glueboards over a five-year period. This proposal applies to glueboards designed to catch a mammal, reptile or amphibian (among other things) but not insects (see Appendix 1 for a full definition of “animal”).

As required by government guidelines, the substantive elements of regulatory impact analysis have been included in this document.

2.1. NAWAC’S RECOMMENDATIONS

In 2000 the National Animal Welfare Advisory Committee (NAWAC)¹ recommended to the Minister of Agriculture that the importation, sale and use of glueboards be prohibited in New Zealand. Glueboards are used widely for rodent control. NAWAC’s recommendations were based on the:

- distress exhibited by rodents caught in them;
- likelihood of an extended period of time between capture and death;
- inhumane manner of death;
- possibility of inhumane disposal of live rodents when traps are inspected; and
- existence of practical alternative methods of rodent control.

2.2. CONSULTATION UNDERTAKEN

In December 2002 the Ministry of Agriculture and Forestry (MAF) released a discussion document on NAWAC’s recommendations seeking comment from interested parties. The document analysed NAWAC’s recommendations against the criteria in section 33 of the Act that the Minister needs to take into account before deciding whether or not to prohibit or restrict a trap (See Appendix 1 for details). Thirty-four submissions were received. The main issues raised during this consultation appear in Appendix 3.

In 2006 MAF discussed aspects of this proposal with various individuals, organisations, government departments and private companies to help it come to the conclusions outlined in this document. MAF has discussed this proposal with NAWAC.

2.3. COMMENTS INVITED

This paper outlines recommended changes in policy on the sale and use of glueboards. We would appreciate any feedback on the proposals by **5pm, Friday 31 October 2008**. Key questions for comment appear in section 8.1. Depending on the outcome of this consultation, MAF expects a regulation to be in effect by 1 July 2009.

¹ The National Animal Welfare Advisory Committee or NAWAC is an advisory body to the Minister of Agriculture. See Appendix 2 for details.

3. What is the Issue?²

MAF has reviewed the policy around the importation, sale and use of glueboards in order to address NAWAC's recommendation to the Minister in 2000. MAF has a responsibility to administer the Animal Welfare Act and considers that the level of potential pain and distress suffered by animals trapped on glueboards is unacceptable, and that cost-effective and more humane alternative methods of pest control are available. The issue of animal welfare is a public concern and also reflects on New Zealand's international reputation.

3.1. THE ANIMAL WELFARE ACT 1999³

MAF administers the Animal Welfare Act and is responsible for setting animal welfare standards. The Act covers all vertebrate species (mammals, birds, reptiles, amphibians, and bony or cartilaginous fishes) and some invertebrate species (octopus, squid, crabs, lobsters and crayfish only). It does not apply to insects.

Sections 32-36 of the Act contain provisions to regulate the use of traps. Any trap can be used on an animal except where there is a regulation in effect, made by an Order in Council, declaring that trap to be prohibited or restricted. If such a regulation is in place, a prohibited trap cannot be used or made available for sale and a restricted trap may only be used or sold in the way permitted by the regulation. A prohibition or restriction may be general or may relate to a particular trap or class of trap. A regulation for a restricted trap or class of trap may relate to its use in relation to a particular species or type of animal, or a specified geographic location. Any breach of the provisions of the Order in Council is an offence punishable by up to six months imprisonment and/or a fine up to \$25,000 or both (or \$125,000 for a body corporate).

Section 33 of the Act outlines criteria that the Minister must consider when deciding whether or not to recommend that a trap be prohibited or restricted.

Section 56 of the Act enables the National Animal Welfare Advisory Committee (NAWAC) to be established. NAWAC provides advice to the Minister of Agriculture on any matter relating to the welfare of animals in New Zealand. Information about NAWAC appears in Appendix 2.

The only current legislative restriction of glueboard use is the requirement, under section 36 of the Act, that traps intended to capture an animal alive must be checked within 12 hours after sunrise on each day that the trap remains set, beginning the day after it was first set. Because glueboards are not intended to kill trapped animals, users must meet this requirement.

3.2. WHAT IS A GLUEBOARD?

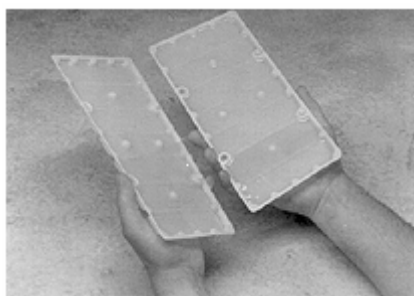
Glueboards (also known as glue traps or glueboard traps) are a simple trap in both design and use. They consist of a non-drying adhesive either attached to one side of a flat surface or contained in a shallow tray. Sizes vary according to manufacturer and target animal, but dimensions generally range from 12 cm x 9 cm (mouse size) to 25 cm x 12 cm (rat size). Some are covered with folded cardboard to ensure dust etc. does not contaminate the

² Much of the information in this section is based on the discussion document MAF released in 2002 (MAF, 2002), submissions received in response to that document and conversations with various people knowledgeable on this topic.

³ See Appendix 1 for details of appropriate sections of the Act.

glueboard and reduce the effectiveness of the adhesive surface. Glueboards cost between \$0.70 and \$4.50 depending on their size and any bulk purchase discounting.

Glueboards are used as a method of pest control. In New Zealand, they are used to capture insects and rodents (rats and mice), and may also be used to control pest lizards.



3.3. WHERE ARE GLUEBOARDS USED AND BY WHOM?

Glueboards are used in commercial and, to a lesser extent, residential settings. Glueboards are placed along pathways used by rodents, which are captured (along with debris and insects) in the adhesive as they attempt to walk across the glueboard. They may also be placed inside non-lethal mechanical traps to facilitate easy removal of captured animals. Each glueboard can be used only once and is discarded with the animal still stuck on it.

Glueboards became available in New Zealand in the 1990s. Their use has generally increased since then, although not in all situations. Most major glueboard suppliers in New Zealand report that they rarely sell these traps to the general public or retail shops because of concerns about the humane disposal of captured animals by inexperienced people.

Commercial pest control operators favour glueboards as a method of rodent control in certain circumstances. While some operators use them in residential or non-commercial settings, their main use is in commercial situations and particularly in certain areas of food production premises where poisoning is not favoured due to the risk of contaminating products processed there. They are also used, to a lesser extent, in the energy sector where there is a risk of rodents gnawing wires.

Glueboards are widely used in the dairy production industry in particular. They are laid at factory sites and inside and around the perimeter of supporting facilities such as ingredient and package suppliers, and storage and port facilities. Rigorous control measures outside of buildings helps to minimise the capture of rodents inside buildings. The New Zealand Food Safety Authority reports that the use of glueboards in meat and seafood processing facilities has declined and that few are used in those premises now.

Glueboards are considered one of the few options available to control lizards in the event of an incursion of a pest lizard species, but are not currently used to any significant extent for this purpose. The Department of Conservation provides fishers and transport operators with glueboards for use in boats around some rodent-free islands to reduce the risk of re-infestation.

3.4. WHAT ARE THE ANIMAL WELFARE CONCERNS?

The use of glueboards has raised animal welfare concerns, due to both their inhumaneness as a trap and the potential for inhumane disposal of animals caught, e.g. dispatch of a captured live animal by drowning, incineration or disposal in a rubbish bin.

Once captured on a glueboard, an animal is usually unable to free itself from the adhesive, and will generally bring additional body parts into contact with the adhesive as it attempts to free itself. In doing so, the animal will tend to further entrap itself. Animals may, in their attempts to free themselves, rip patches of fur out or break limbs. They may also defecate and urinate excessively from panic and distress.

Glueboards are considered non-lethal or restraining traps, but this does not mean that trapped animals will not die on a glueboard. If an animal is not found and euthanased promptly, death may arise as a result of dehydration, starvation or suffocation.

MAF's 2002 discussion document assessed the degree of pain or distress experienced as a result of being caught on a glueboard. While all animals suffer some level of stress or discomfort on becoming stuck, the document concluded that when animals are left on glueboards for extended periods, the animals suffer a level of pain or distress that is unacceptable.

An important aspect of this argument is the length of time animals are left on the trap. If animals were left on glueboards for only very short periods and if they were disposed of humanely, the level of pain and/or distress could be considered more acceptable, thereby reducing the unreasonableness of the level of pain and distress caused by glueboards. Laboratory studies⁴ have found animals may still be alive more than 24 hours after capture and indicated that a significant amount of pain and distress was likely while rodents were trapped. This is supported by anecdotal accounts from members of the pest control industry and public.

A 2003 review article⁵ compared the humaneness of rodent pest control methods on the basis of degree and duration of pain, discomfort or distress, effect on animals that escape and survive, and effect on non-target animals. Practical advantages and disadvantages were also considered. Glueboards were considered amongst the least humane methods, causing "instant and prolonged distress and trauma, followed by dehydration, hunger and sometimes self-mutilation when animals are held for long periods". The article concluded that glueboards should only be used as a last resort.

3.5. WHAT ALTERNATIVE METHODS ARE AVAILABLE?

In most situations, alternative, cost-effective pest control methods exist, especially for rodents. Alternatives include kill-traps such as snap traps, those using a snare mechanism and one using carbon dioxide, live capture traps, attractants, and electronic and electrocution devices.

MAF's 2002 discussion document assessed the level of pain or distress caused by four alternative methods – curiosity traps, electrocution, poisons, and snap traps. Apart from poisons, as some types are considered to be as inhumane as glueboards, these alternatives

⁴ Frantz, S.C. and Padula, C.M (1983) pp220.

⁵ Mason G; Littin KE. 2003. The humaneness of rodent pest control. *Animal Welfare* 12:1-37.

were generally considered to produce a more acceptable level of pain or distress than glueboards.

MAF's 2002 discussion document also assessed the cost-effectiveness and feasibility of transitioning to these four alternative methods. It concluded that, although alternative methods may be more expensive than glueboards, they are reusable (apart from poisons), whereas glueboards can only be used once. This means that any initial higher capital outlay would be offset by the ability to re-use traps such as snap traps, curiosity traps etc. Reusable traps are also beneficial in terms of environmental sustainability.

Since the publication of MAF's 2002 document, a patent has been issued for an electrocution device which passed the NAWAC test for welfare performance⁶ and on that basis can be considered acceptably humane. A trap that uses an enclosed noose to kill has also passed the NAWAC test for welfare performance and is commercially available.

The dairy industry considers that in dairy processing premises and some associated facilities fewer alternatives are available. Within certain areas in some dairy processing premises high hygiene standards apply under their risk management programme, where the use of poisons, attractants, baits and other potential contaminants (including wooden traps) are not permitted. The dairy industry tries to limit the potential for contamination in these facilities and so considers snap traps less acceptable as it considers that there is an increased risk of biological contamination from animal parts that may become exposed or remain on the trap after the animal is removed. The industry also considers live capture traps less acceptable because of the risk of a rodent escaping when taken out of the trap.

3.6. INTERNATIONAL CONSIDERATIONS

While the World Organisation for Animal Health (OIE) has adopted a number of animal welfare guidelines, there are currently no relevant international guidelines or standards addressing the use of glueboards. Officials consider that it is unlikely that the OIE would undertake work in this area.

In terms of the practices of other countries, within Australia, Tasmania has passed legislation prohibiting the use of glueboards for rodent management, with an exemption from the Minister being available in certain circumstances. Restrictions on the use of glueboards are being considered in other parts of Australia, but no other state has yet introduced any regulatory requirements. In the United Kingdom no specific regulatory restrictions exist, but the British Pest Control Association has a code of practice covering glueboards. Prosecutions can be initiated under various laws protecting animals if the code of practice is not followed.

3.7. MAF'S OBJECTIVE

MAF's objective is to reduce the risk to animal welfare from the use of glueboards while ensuring the viability of pest control in New Zealand.

⁶ NAWAC Guideline 09: Assessing the welfare performance of restraining and kill traps. Available from <http://www.biosecurity.govt.nz/animal-welfare/nawac/policies/index.htm>

4. Options and Impacts

In this section, each option is described and its impacts discussed in relation to the objective stated in 3.7.

4.1. STATUS QUO

This option would keep the situation as it is currently, with glueboards having no restrictions apart from the legislative requirement to check a trap intended to catch an animal alive within 12 hours after sunrise on each day the trap remains set, beginning the day after it was first set.

In this scenario, anybody can buy and use a glueboard, whether they are a commercial pest control operator or not.

4.1.1. Impacts

A benefit of this option is that glueboards would remain available for use as a pest management tool. Pest control agencies would not incur any costs in having to change to another method for situations where glueboards are currently used. Likewise, food production industries would not need to find alternative methods of pest control for certain areas in their premises that require strict hygiene standards to limit potential contamination.

A major cost of upholding the status quo is that the animal welfare concerns would remain. This would mean that trapped animals would continue to suffer unacceptable levels of pain and distress due to the amount of time they may remain stuck on a glueboard and the potential for inhumane disposal. This would not meet MAF's objective and would also not address NAWAC's recommendation to the Minister. New Zealand's international reputation could be put at risk and public concern would remain.

MAF considers that there is a need to change the status quo.

4.2. EDUCATION

This option would see MAF embarking on a campaign to educate pest controllers and the general public on how to use glueboards in ways that minimise the welfare risk to trapped rodents. This could include producing information pamphlets outlining the legislative requirement to check a trap every day after setting and suggesting humane methods of disposal of trapped rodents. These pamphlets could be distributed to pest control companies and suppliers to be included in their training programmes, as well as retailers.

Public awareness of the animal welfare concerns associated with glueboards could be raised by including information on MAF's website and via the media. This information could suggest alternative methods of pest control as well as suggestions on how to better use glueboards if no other options are available.

No regulations on the sale and use of glueboards would be put in place.

4.2.1. Impacts

The benefits of this option for industry are largely the same as in the status quo, as there would be no cost involved in switching to alternative options of pest control. There may be an additional benefit in MAF supplying educational material to the pest management industry, as this could provide more assurance to MAF, other animal welfare agencies, and the public, that

pest control agencies are addressing animal welfare concerns in their practises. It could also provide assurance to the pest control industry that they are meeting MAF's standards in terms of minimising the risk to animal welfare from glueboards. However, even if industry was supportive of the education campaign and aimed to comply with the legislative requirement for checking times, there is still the possibility that trapped animals would remain on a glueboard for a period of time long enough to cause unacceptable pain and distress.

There would be costs to government and the public in funding this campaign.

Raising public awareness about the risks to animal welfare associated with the use of glueboards may encourage people to seek alternative methods of pest control in their homes or to at least check traps more frequently and dispose of trapped animals more humanely. However, there is no way of ensuring that a public education campaign would be successful, as it would rely on the voluntary compliance of individuals who may or may not care about the welfare of rodents.

4.3. INDUSTRY STANDARDS

In this option, the pest management industry could develop an agreed code of practice which would define best practice and educate other industries (e.g. dairy and other food production industries) and the public in the use of glueboards and humane disposal of trapped animals. There would be no government involvement and no regulations put in place.

4.3.1. Impacts

Industry would benefit in not incurring costs by having to switch to alternative methods of pest control, but there may be some cost involved in developing a code of practice.

Compliance with industry standards by commercial and residential glueboard users would be voluntary, so the welfare concerns would still remain.

4.4. RESTRICT TO COMMERCIAL USE ONLY

In this option, a restriction could be made to allow only trained pest control operators to use glueboards, and only in commercial settings such as food production premises. This option was canvassed by MAF's 2002 discussion document (see Appendix 3 for details).

4.4.1. Impacts

There would be no cost to industry in having to switch to alternative methods of pest control. The risks to the welfare of animals from use of glueboards by the general public would also be mitigated, but since they are only small users the net welfare benefit would be small.

The welfare issues remain even if only trained people use glueboards, unless they are able to inspect the glueboards at very short intervals, as the principal concern is the pain and distress caused to a trapped animal.

This option would also disadvantage those users, e.g. Department of Conservation, who may use glueboards for conservation purposes such as on boats travelling to rodent-free island reserves.

Glueboards are currently used mostly within the pest control industry or by those industries operating food production premises (e.g. dairy), so limiting use to these people or in these situations would not significantly improve the overall welfare of the animals caught.

4.5. PHASED-OUT PROHIBITION OF SALE AND USE WITH MINISTERIAL EXEMPTIONS POSSIBLE

This is MAF's preferred option. Under this option an Order in Council would be made declaring glueboards to be prohibited traps. Regulations would be made under section 32(1) of the Animal Welfare Act to prohibit the sale and use of glueboards over a five-year period. The Minister would be able to grant an exemption to allow a person to sell or use a glueboard under certain conditions.

This option is preferred because it best meets the objective of reducing the risk to animal welfare from the use of glueboards while ensuring the viability of pest control in New Zealand.

Details of this preferred option are in section 6.

4.5.1. Impacts

There would be costs to industry in having to switch to alternative methods of rodent pest control where glueboards may have been preferred. MAF's 2002 discussion document concluded that this transition appears feasible as there is a range of cost-effective alternatives available that are at least as effective as glueboards. These other methods may be more expensive and so require a greater initial capital outlay, but this may be offset by the ability to re-use these traps. This would also be a benefit in terms of environmental sustainability. Glueboards are used only once to capture one animal and then discarded.

A longer transition period of five years is proposed in certain areas of food production premises where there is a high risk of contamination. Glueboards are more widely used in the dairy and other food production industries and so the cost of transition would be greater. Five years is considered to be a sufficient amount of time to be able to research, test and make the transition to alternatives that would meet any requirements for food safety.

Residential use of glueboards and the sale of glueboards to persons other than pest control operators and operators of food production premises would be prohibited immediately. This reflects the limited use of glueboards in this area. Pest control operators and operators of food production premises would be able to buy glueboards for another five years to allow adequate time for new, cost-effective and more humane methods of rodent control to be integrated into their pest control programme or new technology to be developed. The animal welfare concern would, therefore, be addressed immediately in non-commercial areas and eventually in all areas after five years.

The making of an Order in Council is not expected to require any increased allocation of government funds. Enforcement of animal welfare legislation is currently based on complaint investigations. Any additional complaint investigations will be taken out of existing fund allocations.

Including a Ministerial exemption for the use and sale of glueboards in certain circumstances will help ensure the viability of pest control in situations where other alternatives are not viable. Phasing in the prohibition of the use and sale of glueboards will also ensure the viability of pest control in New Zealand by giving adequate time for those who use glueboards widely to research and transition to other methods of rodent control.

4.6. IMMEDIATE PROHIBITION OF SALE AND USE WITH NO MINISTERIAL EXEMPTION

In this option an Order in Council would be made declaring glueboards to be prohibited traps and regulations would be made under section 32(1) of the Animal Welfare Act to prohibit the sale and use of glueboards immediately. There would be no provision for the Minister to be able to grant an exemption to anyone under any circumstances.

4.6.1. Impacts

In this scenario the animal welfare concerns would be addressed in all areas immediately.

An immediate ban may not allow industry, especially dairy and other food production industries, enough time to research, test and make the transition to alternative options that are cost-effective, more humane and meet any food safety requirements that are in place. Other users of glueboards for conservation or other purposes would also be disadvantaged. This could impact on the viability of pest management in these areas.

5. Other matters considered

5.1. RESEARCH

The intention is to allow a prohibited trap to be used for research purposes since this research is subject to ethics approvals under Part 6 of the Animal Welfare Act. If approved, conditions can be applied to those approvals to reduce animal welfare concerns.

Part 6 of the Act deals with the use of animals in research, testing and teaching. Section 81(1) states that nothing in Parts 1 and 2 of the Act prevents animals from being used in research. A regulation made under Part 2 is subject to this provision and therefore specific reference in the Order in Council to allow research is not needed. Research under Part 6 refers in general terms to research associated with some manipulation to an animal.

5.2. IMPORTATION RESTRICTION ON GLUEBOARDS

NAWAC recommended that the commercial importation of glueboards be prohibited. The Animal Welfare Act does not contain provisions to prohibit or restrict imports. If such prohibitions or restrictions are needed, they could be made under section 54 of the Customs and Excise Act 1996. However, any such restriction is valid for three years only and within that time can be extended for further periods of three years. This means that resources would need to be made available every three years to extend the order. Orders are currently in place for four items which are seemingly at a higher level of public or political importance (offensive weapons, asbestos, toothfish and trout).

MAF considers that the general intent of NAWAC's recommendations and MAF's objective to reduce the risk to animal welfare would be met with the prohibition on the sale and use of glueboards. Further, while an import prohibition might reduce the use of glueboards in New Zealand, it would not affect the use of glueboards produced here in a commercial or "home-made" setting. An import restriction is unlikely to significantly reduce the risk to animal welfare over and above what is already proposed.

MAF would liaise with appropriate authorities to ensure that importers are made aware of the restrictions on the sale and use of glueboards.

5.3. RESTRICTING WHO CAN SELL A GLUEBOARD

Similarly to the issue of banning importation, MAF considers that restricting who can sell glueboards is unlikely to significantly reduce the risk to animal welfare over and above the proposal to restrict who can be sold a glueboard. MAF would liaise with glueboard retailers to ensure they are aware of the restriction on whom they can sell a glueboard to.

5.4. REDUCING INSPECTION TIME FOR RESTRICTED GLUEBOARDS

Some submitters to MAF's 2002 discussion document suggested that the time in which a glueboard must be inspected should be reduced. This relates to one of the criteria under section 33 of the Animal Welfare Act that the Minister must consider when deciding whether or not to recommend that a trap be prohibited or restricted – whether the use of other instruments under the Act can avoid or mitigate the unacceptable effects on animal welfare.

Currently section 36 of the Act specifies that traps should be inspected within 12 hours of sunrise on every day that the trap remains set.

It would be difficult to enforce compliance with inspection requirements designed to ensure animals remain on glueboards for shorter periods only, and with any euthanasia requirements. Given the proposal that by 1 July 2009 glueboards will not be used in many situations in which they are now, and by 1 July 2014 will not be permitted in any situation except as the Minister allows, MAF considers that there is limited benefit in reducing the inspection time. The majority of submitters concurred with this view. MAF would, however, encourage more frequent inspection of glueboards than the current daily requirement.

5.5. MODIFYING GLUEBOARDS TO AVOID UNACCEPTABLE EFFECTS ON ANIMAL WELFARE

This relates to one of the criteria under section 33 of the Animal Welfare Act that the Minister must consider when deciding whether or not to recommend that a trap be prohibited or restricted.

Glueboards are simple traps consisting fundamentally of an adhesive surface on a flat object. Modification of the trap is therefore limited without creating a wholly new trap or device.

One possible modification could be the use of toxins in the adhesive. Such a modification could ensure that trapped animals are killed quickly rather than left stuck to the glueboard until disposed of. Problems arise with this, however, as non-toxicity is one of the primary reasons glueboards are preferred in some situations. Toxicity may also pose a danger to non-expert users of glueboards and raise additional issues about proper disposal of used boards.

5.6. "HOME-MADE" GLUEBOARDS

Due to the simple nature of glueboards it is possible that individuals may be able to make their own if a ban on their sale and use was implemented. The adhesive used in glueboards is available overseas in pails, but this glue is no longer imported into New Zealand due to low consumer demand. If glueboards were prohibited, "home-made" glueboards would also be illegal. However, given that the primary users are commercial enterprises such as the food production and pest control industries, and that alternatives are available, it is unlikely to be a major issue.

6. Policy proposals for the preferred option: Phased out prohibition of sale and use with Ministerial exemptions possible

This section outlines the proposed policy changes for the use of glueboards. The recommendations describe the intent of the policy. Their wording may not necessarily be the actual wording used in any new legislation.

6.1. DEFINITION

A definition of a glueboard would be required in the Order in Council to clearly describe that trap.

A **glueboard** is a device consisting of an adhesive glue layer on a flat, solid base, usually card or plastic, that is intended to capture and hold a live animal. It may be contained in a shallow tray.

6.1.1. Comment

The definition applies to any animal as defined by the Animal Welfare Act and includes a mammal, bird, reptile, amphibian, bony or cartilaginous fish, octopus, squid, crab, lobster and crayfish (see Appendix 1 for full details). It does not apply to an insect so does not affect the use of glueboards for cockroaches, flies and other insects.

The prohibition applies to any glueboard that is manufactured or designed to capture an animal, by its size is intended to capture an animal, or is set in such a way to capture an animal. This definition is aimed at preventing glueboards designed for rodents from being used for insects, or any large glueboard from being used for insect control, both of which would increase the risk of rodent by-catch. It is not intended to apply to those glueboards aimed at catching insects.

6.2. RECOMMENDATIONS

Recommendation 1: Use of glueboards prohibited

- 1a. From 1 July 2009 the use of glueboards is prohibited in any place, other than those places referred to in recommendation 1b;
- 1b. A glueboard may be used in the following places until 1 July 2014:
 - i) specific areas or rooms inside food production premises, where there is a high risk of contamination;
 - ii) a glueboard may only be used in these places if there is a requirement by law to operate under conditions of strict hygiene, where poisons, attractants, baits and other potential contaminants cannot be used.

6.2.1. Comment

The vast majority of submissions on MAF's 2002 discussion document favoured a prohibition or restriction on the use of glueboards. They considered the level of pain or distress caused by glueboards to trapped animals to be unreasonable and that adequate alternatives were available. However, some respondents felt that glueboards should not be ruled out as a method of pest control in certain situations, such as in food production premises.

In deciding whether to restrict or prohibit a trap, the Minister must consider whether any pain or distress that the trap or device is likely to cause would be unreasonable (section 33(b) of the Act). To ascertain whether such pain or distress is 'unreasonable', the level of pain or distress is considered in conjunction with the duration of suffering. A higher degree of pain or distress may be more acceptable in a method that induces a quick death. Similarly, a slow death may be more acceptable if it involves low levels of pain or distress. Available evidence indicates that the level of pain and distress experienced by the animal on a glueboard varies from low to high. The fact that animals may remain alive on glueboards for long periods (research indicates that periods in excess of 24 hours are not uncommon) means even low levels of pain would be considered unacceptable. The majority of submissions supported this view.

MAF's 2002 discussion document assessed the availability and cost effectiveness of four other traps and devices for rodent control (curiosity traps, electrocution, poisons and snap traps) and concluded that a transition to alternatives appears feasible and a range of cost-effective alternatives are available that are as effective as glueboards. As noted above in 3.5, since the release of the 2002 discussion document, further alternatives have become available in New Zealand.

MAF proposes that glueboards are prohibited throughout New Zealand and that their use is phased out.

From 1 July 2009 glueboards would not be able to be used in residential premises, other non-commercial locations such as in public buildings and sports facilities, or in commercial settings other than in particular areas within food production premises.

Few glueboards are used by the general public, although some commercial pest control operators use them in non-commercial premises particularly to deal with "rogue" rodent problems. There are cost-effective and more humane alternatives to glueboards in these situations (snap traps, live capture traps, and certain poisons such as anticoagulants or cholecalciferol). Glueboards have limited use in these areas now and therefore the impact of this prohibition will be minimal.

From 1 July 2009 glueboards could not be used in most commercial premises including food handling, preparation and distribution premises (e.g. restaurants, takeaways, dairies, bakeries, supermarkets) and the energy sector. Poisons, attractants and baits are able to be used in most food handling and preparation areas (and are frequently used in those situations by the larger pest control companies now) and in the energy sector. Where there are concerns about the use of toxins such as in food handling or preparation areas, snap traps, snare traps, live capture traps, kill traps using carbon dioxide, and electrocution devices could be used.

The proposal allows food production (including dairy) premises to continue to use glueboards until 1 July 2014, but only inside those premises and only in areas or rooms of strict hygiene where there is a high risk of contamination and most other forms of pest control are not permitted. Glueboard use would largely be limited to certain processing rooms within

factories (e.g. in facilities producing infant formula or milk powder). In all cases there must be a programme supported by legislation that prevents potential contaminants (such as poisons, attractants, baits, wood products) from being used in those areas and where biological contamination needs to be kept to a minimum.

A five year phase-out period is proposed in the areas of strict hygiene in food production premises because of the wide use of glueboard traps in these areas and the resultant high initial cost of transition to alternative methods of rodent control. Alternative pest control options are readily available for use in outdoor areas such as around the perimeter of the site and around buildings, and in utility and amenity areas within these premises, which keep pests from entering the building and areas of strict hygiene. Therefore, glueboards could not be used in these areas from 1 July 2009.

The proposal recognises that the food production industry needs to maintain strict levels of hygiene in certain areas within premises because of the risk to human health, food quality and the export market. However, MAF considers that use of glueboards in these premises should not continue indefinitely because of the inhumane nature of these traps and that some incentive is needed to research more humane alternatives for use in these areas. MAF therefore proposes a five-year phase-out period in which glueboards could no longer be used in any situation. MAF considers that five years should provide operators of food production premises sufficient time to research, test and move to more humane methods of rodent control and to obtain approval of updated pest control programmes by the appropriate bodies.

In the event that adequate alternatives are not available by 1 July 2014, operators of affected premises or affected industries could apply to the Minister for approval of certain people to continue using glueboards, provided the criteria are met (see recommendation 3).

Do you agree with the proposal that an immediate ban on the use of glueboard traps is appropriate in:

- residential premises;
- other non-commercial premises (e.g. public buildings, sports facilities);
- commercial premises other than those used in food production (e.g. dairies, restaurants, the energy sector)?

If you do not agree with this proposal, please state your reasons.

Do you agree with the proposal that five years is an appropriate phase-out period for glueboards in specific areas or rooms inside buildings of food production premises, where there is a high risk of contamination, and where there is a requirement by law to operate under conditions of strict hygiene (where poisons, attractants, baits and other potential contaminants cannot be used)?

If not, should the phase out period be longer or shorter? Please state your reasons.

Recommendation 2: Sale of glueboards prohibited

No glueboard may be sold to:

- i) any person other than a commercial pest control operator or an operator of premises referred to in recommendation 1b from 1 July 2009;
- ii) any person from 1 July 2014.

6.2.2. Comment

It is proposed that glueboards could be sold to anyone until 1 July 2009. After that date, glueboards could only be sold to commercial pest control operators and operators of food production premises until 1 July 2014. Although the people specified in recommendation 2a can buy glueboards for a longer period of time, they will only be able to use them in certain areas of food production premises for the five years between 1 July 2009 and 1 July 2014 (see recommendation 1).

Do you agree that an immediate ban of the sale of glueboard traps to persons other than pest control operators and operators of food production premises is appropriate? If not, please state your reasons.

Do you agree that five years is an appropriate phase-out period for the sale of glueboards to pest control operators and operators of food production premises? If not, please state your reasons.

Recommendation 3: The Minister may approve a person to use or sell an otherwise prohibited glueboard

The Minister may approve a person to use or sell, in a specified situation or for a specified purpose, a glueboard that would otherwise be prohibited under recommendation 1 or 2, and may set conditions on that use or sale if the Minister considers that:

- i) the matter is in the public interest (including for biosecurity, conservation, human health, animal health, food safety and food quality purposes); and
- ii) no viable alternative is available or feasible given the circumstances.

6.2.3. Comment

This recommendation allows approved people to sell and use glueboards otherwise prohibited, on successful application to the Minister. It aims to deal with situations where the use of these traps would be in the public interest and where alternative methods are either not available or are not feasible given the circumstances, e.g. other traps are not able to sufficiently target the species in question, there is an urgent need to deal with the situation such as in a biosecurity incursion response. Ministerial approval could be given for urgent and routine, as well as one-off and ongoing situations. The Minister could apply conditions to the way the glueboard is used.

Uses that would be in the public interest include those for biosecurity, conservation, human health, animal health, food safety and food quality purposes. Having this provision as a Ministerial approval rather than stipulating situations within the Order in Council provides flexibility for unforeseen situations and gives the Minister the ability to alter the approval and the conditions of use if more humane alternatives become available or technology and knowledge changes.

A number of submissions on MAF's 2002 discussion document raised the need to be able to use glueboards in specific situations where there are few if any alternatives. MAF has indicated that there are few alternatives to glueboards for dealing with lizard incursions, for example, and the Department of Conservation provides fishers and transport operators with glueboards for use in boats around some rodent-free islands to reduce the risk of re-infestation. After 1 July 2009 certain people could use glueboards in these situations with Ministerial approval.

This provision would also be available to the food production industry. In the event the industry is unable to move to alternative methods of rodent control by 1 July 2014, they would be able to apply to the Minister for approval for certain people to retain the use of glueboards within specified areas where there is a high risk of contamination. Bringing this situation under Ministerial approval after five years rather than continuing glueboard use in these premises indefinitely means that, if the application is successful, the Minister could apply further conditions to ensure humane use of glueboards until such time as more acceptable alternatives become available, or could alter the approval as new technology or knowledge becomes available.

Such a provision is currently in place for leg-hold traps under the Animal Welfare (Leg-hold Traps) Order 2007.

Do you agree that the Minister should be able to approve a person to use or sell an otherwise prohibited trap in certain cases? If not, why?

7. References

Frantz, S.C. and Padula, C.M (1983). A Laboratory Test Method for Evaluating the Efficacy of Glueboards for Trapping House Mice. *Vertebrate Pest Control and Management Materials: Fourth Symposium, ASTM STP 817*, D E Kaukinen Ed., American Society for Testing and Materials, Philadelphia.

Mason, G & Littin, KE (2003). The humaneness of rodent pest control. *Animal Welfare* 12:1-37.

Ministry of Agriculture and Forestry (2002). Proposed Prohibition on the Use of Rodent Glueboard Traps: MAF public discussion paper no. 29. Wellington.

8. Notes for Submitters

MAF welcomes submissions from all interested parties on the proposals presented in this document.

Submissions are public information and may be the subject of requests under the Official Information Act 1982. If you consider that any or all of the information in your submission should be treated as confidential or commercially sensitive, please state this clearly in your submission. Any decision to withhold information under the Official Information Act may be reviewed by the Ombudsman.

8.1. KEY QUESTIONS

As part of your submission, MAF would particularly welcome comment on the following questions.

1. Do you agree with the proposal that an immediate ban on the use of glueboard traps is appropriate in:
 - residential premises;
 - other non-commercial premises (e.g. public buildings, sports facilities);
 - commercial premises other than those used in food production (e.g. dairies, restaurants, the energy sector)?

If you do not agree with this proposal, please state your reasons.

2. Do you agree with the proposal that five years is an appropriate phase-out period for glueboard traps in specific areas or rooms inside buildings of food production premises, where there is a high risk of contamination, and where there is a requirement by law to operate under conditions of strict hygiene (where poisons, attractants, baits and other potential contaminants cannot be used)?

If not, should the phase out period be longer or shorter? Please state your reasons.

3. Do you agree that an immediate ban of the sale of glueboard traps to persons other than pest control operators and operators of food production premises is appropriate? If not, please state your reasons.
4. Do you agree that five years is an appropriate phase-out period for the sale of glueboards to pest control operators and operators of food production premises? If not, please state your reasons.
5. Do you agree that the Minister should be able to approve a person to use or sell an otherwise prohibited trap in certain cases? If not, why?
6. Do you consider that the stated impacts of the proposals outlined in this document are accurate? If not, please state your reasons.
7. If you do not agree with the proposals outlined in this document, what do you consider are feasible alternative options that will achieve equal animal welfare outcomes? Please comment on the impacts of any further options you suggest.

8. Are there any other issues you would like to comment on?

8.2. REQUIREMENTS FOR SUBMISSIONS

Submitters are asked to include the following information in their submissions:

- the title of this document;
- your name and title;
- your organisation's name (if applicable);
- your address and contact details (e.g. phone, fax and email); and
- the number(s) of the sections you are commenting on.

8.3. CLOSING DATE FOR SUBMISSIONS

All submissions must be received by MAF no later than **5pm, Friday 31 October 2008**.

Please address submissions to:

Shari Mannan
Policy Analyst
MAF Biosecurity New Zealand
PO Box 2526
WELLINGTON

Email: shari.mannan@maf.govt.nz
Facsimile: 04 894 0417

8.4. PROCESS FOLLOWING RECEIPT OF SUBMISSIONS

At the conclusion of the consultation period submissions will be analysed and a final policy position agreed. A document summarising the submissions will be made available for viewing on request. Depending on the outcome of this consultation, a regulation is likely to be in place by 1 July 2009.

Appendix 1: Extracts from the Animal Welfare Act 1999

Definition of animal

Animal –

- (a) Means any live member of the animal kingdom that is -
 - (i) a mammal; or
 - (ii) a bird; or
 - (iii) a reptile; or
 - (iv) an amphibian; or
 - (v) a fish (bony or cartilaginous); or
 - (vi) any octopus, squid, crab, lobster, or crayfish (including freshwater crayfish); or
 - (vii) any other member of the animal kingdom which is declared from time to time by the Governor-General, by Order in Council, to be an animal for the purposes of this Act; and
- (b) includes any mammalian foetus, or any avian or reptilian pre-hatched young, that is in the last half of its period of gestation or development; and
- (c) includes any marsupial pouch young; but
- (d) does not include -
 - (i) a human being; or
 - (ii) except as provided for in paragraph (b) or paragraph (c) of this definition, any animal in the pre-natal, pre-hatched, larval, or other such developmental stage.

32 Power to declare traps or devices to be prohibited or restricted traps or devices

- (1) For the purposes of this Act, the Governor-General may from time to time, by Order in Council, made on the advice of the Minister tendered after consultation by that Minister with the National Animal Welfare Advisory Committee, declare any trap or device to be -
 - (a) a prohibited trap or a prohibited device; or
 - (b) a restricted trap or a restricted device.
- (2) Subsection (1) does not authorise the making of an order in respect of any trap or device used for fishing.
- (3) Subsection (2) does not derogate from the provisions of:
 - (a) The Wildlife Act 1953; or
 - (b) The Marine Mammals Protection Act 1978; or
 - (c) The Fisheries Act 1996.
- (4) Where the order declares any trap to be a restricted trap or any device to be a restricted device, the order may contain provisions regulating the sale or use of the trap or device.
- (5) An order may be general in its application or may relate to a particular trap or class of traps or a particular device or class of devices
- (5A) An order relating to a restricted trap or class of traps, or a restricted device or class of devices, may relate to –
 - (a) the use of a particular trap or class of traps, or a particular device or class of devices, in relation to a particular species or type of animal;
 - (b) a specified district or subdivision of a district of a territorial authority, or any specified part of New Zealand.

- (6) The Governor-General may, by Order in Council, made on the advice of the Minister tendered after consultation with the National Animal Welfare Advisory Committee, amend or revoke a regulation made under subsection (1).
- (7) The consultation required by section 184(1) is in addition to the consultation required by subsections (1) and (6) of this section.
- (8) Every Order in Council made under this section is deemed to be a regulation for the purposes of the Regulations (Disallowance) Act 1989 and the Acts and Regulations Publication Act 1989.

33 Criteria

The Minister must, in deciding whether or not to recommend the making of a regulation under section 32(1) or section 32(6), have regard to the following matters:

- (a) The nature and purpose of the trap or device; and
- (b) whether any pain or distress that the trap or device is likely to cause would be unreasonable; and
- (c) whether the use of other instruments under this Act, or instruments under other Acts, are adequate to manage the effects of the trap or device on animal welfare; and
- (d) whether the trap or device conforms to any relevant New Zealand standard within the meaning of the Standards Act 1988; and
- (e) the availability and cost-effectiveness of, and the feasibility of a transition to, other means of achieving the purpose of the trap or device (whether by means of another trap or device or by different means); and
- (f) whether the trap or device could be modified, or the method of use controlled, to avoid unacceptable effects on animal welfare; and
- (g) the consultation conducted under section 32(1) or section 32(6), as the case may be, and any consultation conducted under section 184(1); and
- (h) any other matter considered relevant by the Minister.

34 Restrictions on use of traps and devices to kill, manage, entrap, capture, entangle, restrain, or immobilise animals

A person commits an offence who, without reasonable excuse and for the purpose of killing, managing, entrapping, capturing, entangling, restraining, or immobilising an animal:

- (a) uses a prohibited trap or a prohibited device; or
- (b) uses a restricted trap or a restricted device in contravention of any provision of a regulation made under section 32.

35 Restrictions on sale of traps and devices

- (1) A person commits an offence who, without reasonable excuse, sells, attempts to sell, or offers or exposes for sale, a prohibited trap or a prohibited device.
- (2) A person commits an offence who, in selling a restricted trap or a restricted device, contravenes, without reasonable excuse, any provision of any Order in Council made under section 32.

36 Obligation to inspect traps

- (1) A person who, for the purpose of capturing alive a mammal, bird, reptile, or amphibian, sets or causes to be set a trap, must:

- (a) inspect that trap, or cause a competent person to inspect that trap, within 12 hours after sunrise on each day the trap remains set, beginning on the day immediately after the day on which the trap is set; and
 - (b) remove, or cause to be removed, any live animal found in that trap or attend properly to the care of any such animal or, without delay, kill any such animal.
- (2) A person commits an offence and is liable on summary conviction to a fine not exceeding \$1,200 who fails, without reasonable excuse, to comply with any provision of subsection (1).

56 National Animal Welfare Advisory Committee

This section establishes a committee to be called the National Animal Welfare Advisory Committee.

57 Functions

The functions of the National Animal Welfare Advisory Committee are:

- (a) To advise the Minister on any matter relating to the welfare of animals in New Zealand, including (without limitation):
 - (i) Areas where research into the welfare of animals is required; and
 - (ii) Legislative proposals concerning the welfare of animals.
- (b) To make recommendations to the Minister:
 - (i) Under section 3(3) (which relates to manipulation); and
 - (ii) Under sections 6 and 16 (which relate to surgical procedures).
- (c) To discharge its functions under section 32 in relation to the making of Orders in Council declaring traps or devices to be prohibited or restricted traps or devices:
- (d) To discharge its functions under section 32 in relation to the conditions that should be attached to the sale or use of any restricted trap or restricted device:
- (e) To make recommendations to the Minister concerning the issue, amendment, suspension, revocation, and review of codes of welfare:
- (f) To promote, and to assist other persons to promote, the development of guidelines in relation to:
 - (i) The use of traps or devices or both;
 - (ii) The hunting or killing of animals in a wild state.

Appendix 2: Information on the National Animal Welfare Advisory Committee (NAWAC)

The functions of the National Animal Welfare Advisory Committee (NAWAC), as set out in the Animal Welfare Act, are to:

- advise the Minister on any matter relating to the welfare of animals in New Zealand, including:
 - areas where research into the welfare of animals is required;
 - legislative proposals concerning the welfare of animals.
- make recommendations to the Minister on:
 - declaring procedures not to be manipulations;
 - declaring procedures to be significant surgical procedures and classifying surgical procedures as prohibited or restricted;
 - declaring traps or devices to be prohibited or restricted and any conditions on the sale or use of restricted traps.
- issue, amend, suspend, revoke or review codes of welfare;
- promote, and assist others to promote, the development of guidelines for:
 - the use of traps and devices;
 - the hunting or killing of animals in a wild state.

Current members of NAWAC are:

Mrs Margaret (Peggy) A Burrows Secondary School Principal (nominated by the Ministry of Women’s Affairs)

Mr Hilton E Collier Farm business consultant (nominated by Te Puni Kokiri)

Dr Philip E Cowan Science Leader Pest Control Technologies, Landcare Research NZ Ltd (nominated by Landcare Research NZ Ltd)

Dr Selwyn S A Dobbison Registered Veterinary Specialist (nominated by the New Zealand Veterinary Association)

Mr John R Martin Consultant (Chairperson of the National Animal Ethics Advisory Committee)

Mr Donald O Nicolson Farmer, National Vice President Federated Farmers (nominated by Federated Farmers of New Zealand)

Dr Peter J O’Hara Retired Veterinarian (independent chairperson)

Mrs Jenifer M Prattley National Vice-President, Royal New Zealand Society for the Prevention of Cruelty to Animals (nominated by the RNZSPCA)

Dr Roger A Poland Senior Adviser Animal Welfare, MAF Biosecurity New Zealand (Ministry of Agriculture and Forestry nominee *ex officio*)

Professor Bruce J Ross Agricultural economist, Professor Emeritus Lincoln University (independent appointment)

Dr Gwyneth A Verkerk Veterinarian and animal welfare scientist (nominated by New Zealand Society of Animal Production)

Appendix 3: Key issues canvassed or raised during consultation on MAF's discussion document *Proposed Prohibition on the Use of Rodent Glueboards* released in December 2002

3.1 Submitters

34 submissions were received on MAF's 2002 discussion document:

- 2 from central government bodies;
- 8 from district or regional councils;
- 14 from either part of the pest management industry (8) or another industry group (6);
- 7 from members of the general public;
- 3 from non-governmental organisations with an interest in animal welfare.

3.2 Is the pain or distress caused by glueboards unreasonable?

The vast majority of submitters considered the level of pain or distress caused by glueboards to trapped animals to be unreasonable. Submitters described glueboards as “inhumane”, “barbaric”, “ethically unacceptable” and many noted that trapped animals are subject to prolonged moderate to high levels of suffering. Some submitters advised that the prolonged suffering meant that the trapped animal becomes anxious, fearful, dehydrated, hungry and exhausted.

Some submitters felt that, given the risk of contamination rodents pose to food production and processing facilities, the pain and suffering of animals caught is not unreasonable. One submitter felt that regardless of the level of pain and distress experienced by the trapped animal, the welfare of pest animals should not be a priority for NAWAC.

Other submitters felt that glueboards capture animals humanely based on the view that traps are checked frequently. These submitters felt that rather than prohibiting the use of glueboards, attention should be given to reducing the maximum time between trap inspections to achieve a more positive animal welfare outcome.

3.3 Should glueboards be prohibited or restricted or no action taken?

Restriction options proposed were:

- A
 - (i) A maximum time between inspections of glueboards is set.
 - (ii) Captured animals must be disposed of humanely and in a manner that renders them immediately unconscious.

- B
 - (i) A maximum time between inspections of glueboards is set.
 - (ii) Captured animals must be disposed of humanely and in a manner that renders them immediately unconscious.
 - (iii) Glueboards may only be used in commercial food production premises.

- C
 - (i) A maximum time between inspections of glueboards is set.
 - (ii) Captured animals must be disposed of humanely and in a manner that renders them immediately unconscious.
 - (iii) Glueboards may only be used in residential situations.

- D
- (i) A maximum time between inspections of glueboards is set.
 - (ii) Captured animals must be disposed of humanely and in a manner that renders them immediately unconscious.
 - (iii) Glueboards may only be used in commercial food production premises or by commercial pest control operators in residential situations.

Preferences of the 34 submissions received:

- No action (4)
- No action or restriction (not clear which) (2)
- Restriction – option B or D (8)
- Restriction - option D or prohibition (2)
- Prohibition (13)
- Did not specify a preferred policy option (5).

3.4 Are there adequate alternatives to glueboards?

The majority of respondents considered that more humane, quick-kill alternatives to glueboards are readily available for rodent control. Electrocutation devices and snap traps were considered cost-effective alternatives.

Some respondents expressed concern that different situations require differing pest control methods and that glueboards should not be ruled out where other methods are unsuitable (such as in food production and processing facilities or confined spaces), or for invertebrates such as cockroaches and other insects, or as a tool for monitoring possums and mustelids. A number of submitters pointed out that the use of some alternatives to glueboards (i.e. bait stations) inside food processing facilities is not condoned by international customers due to the risk of product contamination. These submitters felt that glueboards are effective in these situations as they are non-toxic and can be placed in opportune locations.

Concern was expressed by two submitters that glueboards are non-specific in that they may trap non-target wild and/or domestic animals. Another submitter raised the inverse point that glueboards are multi-purpose and can be used to capture invertebrates such as cockroaches.

A small number of submitters considered that alternatives would not necessarily result in less pain and distress to trapped animals. Similarly, a small number felt that every possible method of pest control should remain available for their industry to use. Another submitter felt that while alternatives are available, they are often price restrictive.

One submitter noted that any reduction in the maximum time between inspection of glueboards would result in increased costs to those engaging commercial pest control operators (labour and travel time), thus reducing the cost-effectiveness of glueboards.

There was little response to the issues surrounding the transition to alternative methods of pest control. One submitter felt that a transition period of two to three years would be necessary to amend their company's pest control programme and have it accredited by the appropriate institutions. One submitter emphasised that transition would be possible.

3.5 Could restrictions on the use of glueboard reasonably be applied?

The overwhelming majority of respondents considered that restrictions on glueboard use are likely to be difficult, if not impossible, to enforce. This view was expressed about both the duration that animals may be left on glueboards and the requirements for euthanasia of captured animals. One submitter felt that, when faced with a live rodent, the general public is likely to either kill it inhumanely or dispose of it alive into a rubbish bin. The majority of

submitters held the view that restrictions on the use of glueboards would not be effective as they could not be enforced adequately.

One submitter suggested that staff in commercial facilities could be trained to inspect rodent glueboards and dispose of rodents as part of a unit standard within the National Certificate of Urban Pest Management. Other submitters suggested that requirements on the use of glueboards could be written into pest control specifications.

One comment was made that glueboards should be restricted to use in research, testing, and teaching facilities as here regular checks on glueboards and humane euthanasia of captured animals can be assured under an institutional Ethical Code of Conduct.

3.6 Could restrictions be applied to either commercial or residual use?

Of the submitters who felt that glueboards should not be totally prohibited, the majority felt that their use should be restricted to commercial food production or processing facilities and pest control operators. The submissions expressed divergent views regarding how effective policing compliance with any inspection or euthanasia requirements in the commercial sector would be.

The majority of submitters felt that use of glueboards should be prohibited in industrial sites and residential situations. This opinion was based on the view that inspection and euthanasia requirements would not be met, and would be impossible to enforce in these situations.

One submitter felt that glueboards should be restricted to use in research, testing, and teaching facilities and prohibited for use by the general public.