

Summary of Submissions:

Proposal to prohibit the sale and use of rodent glueboard traps

(MAF Biosecurity New Zealand Discussion Paper: 2008/06)

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1. Introduction

In September 2008 the Ministry of Agriculture and Forestry (MAF) released a discussion paper entitled *Proposal to prohibit the sale and use of rodent glueboard traps* (discussion paper no: 2008/06) and invited submissions on the proposal. The paper presented a proposal to regulate glueboard traps under the Animal Welfare Act 1999.

The proposed regulation would:

- prohibit the use of glueboards for trapping rodents immediately in areas other than inside food production premises where other methods of pest control are not allowed due to risk of food contamination;
- prohibit the sale of glueboards immediately to any person other than a pest control operator or an operator of food production premises;
- prohibit the sale and use of glueboards throughout New Zealand after five years; and
- enable the Minister to approve a person to use or sell an otherwise prohibited glueboard trap if the Minister considers that the matter is in the public interest and alternative methods are either not available or not feasible.

In the proposal a glueboard trap means 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. 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 as to capture an animal. The definition applies to any animal as defined by the Animal Welfare Act, and so does not include glueboards used for trapping insects.

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 due to the animal welfare concerns associated with their use. In December 2002, MAF released a discussion document that analysed NAWAC's recommendations against criteria in the Animal Welfare Act 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. Thirty-four public submissions were received on the 2002 paper. In 2006 MAF discussed aspects of the current proposal with various individuals, organisations, government departments, and private companies. The current proposed regulation for glueboard traps was developed as a result of this process.

MAF placed the 2008 discussion paper on its website and directly notified all local authorities and 68 stakeholders who had either commented on the 2002 discussion document or were considered likely to have an interest in the proposal.

Six weeks were allowed for feedback on the discussion paper, although submissions were received up to one month after this time by arrangement. This document provides a summary of the issues raised in submissions.

2. Submitters

MAF received 30 individual and joint submissions on the proposal.

Government departments	1
Regional councils	1
Incorporated societies	2
Professional associations	1
Non-governmental organisations	1
Private individuals	7
Pest management companies	6
Trap suppliers	6
Pest control tool developers	1
Other industries that use traps	4

3. Issues raised in submissions

This section is organised according to the issues listed below.

General issues raised in submissions

1. Humaneness
2. Public health
3. Checking traps
4. Other uses for glueboards
5. Alternative methods of pest control

Responses to specific questions in the discussion paper

6. Proposal to prohibit use of glueboards
7. Proposal to prohibit sale of glueboards
8. Ministerial exemption
9. Alternative proposals

GENERAL ISSUES RAISED IN SUBMISSIONS

3.1 HUMANENESS

Twenty-one submissions in total raised the issue of animal welfare impact or humaneness.

Of these, five submitters questioned whether glueboards are markedly more inhumane than some other control methods such as other live capture traps and anticoagulant poisons. Two submitters suggested that kill traps such as snap traps can also be inhumane if the animal is trapped but not killed immediately.

One submitter considered the likelihood that trapped rodents will suffer moderate to high levels of pain over a long period to be unacceptable. This submitter had similar concerns about the length of the time an animal is potentially trapped and distressed, and the potential for inhumane disposal, with the use of curiosity traps. They also had concerns about the humaneness and possibility of non-target poisoning with the use of poisons.

Three submitters stated that glueboards are an inhumane way of trapping rodents. A further five submitters acknowledged the animal welfare concerns associated with glueboards (i.e. the length of time an animal is potentially trapped and distressed, and the potential for inhumane disposal).

Three submitters felt that the issue is to do with the user, not the trap itself, and that correct glueboard use (constant monitoring, humane disposal technique) would address the issue of humaneness. Similarly, one submitter agreed that there is undue suffering of rodents and birds arising from uncontrolled, indiscriminate and sometimes unnecessary use of glueboards by untrained people.

One submitter felt that a clearer definition of what is humane is required.

3.2 PUBLIC HEALTH

Ten submitters commented that public health should be taken into account, as well as animal welfare. Most of these submitters highlighted the fact that rodents are pests that can carry disease.

Many submitters also commented that food safety is an important issue and that glueboards are an essential part of rodent control in areas where other methods such as poison baits and snap traps are unable to be used due to the risk of food contamination.

Two submitters commented that glueboards are good for containing biohazards such as urine and faeces, and any parasites that may be on an animal, as well as the animal itself. One submitter noted that these biohazards can drip out of glueboards if they are not handled carefully and that many new technologies completely contain the trapped animal and all bodily discharges.

3.3 CHECKING TRAPS

Nine submitters commented on trap checking times.

Two submitters stated that there needs to be a legal requirement to check glueboard traps regularly (a minimum of twice in 24 hours) to ensure animals are left on for the shortest time possible. Another stipulated a reduction in checking times to once every 12 hours. Similarly, another recommended that glueboards should be considered live-capture traps in instances of biosecurity site incursions or disease management, so should retain the current requirements of checking everyday within 12 hours of sunrise.¹ One submitter commented that they should be checked every six hours (pending phase-out).

Two submitters commented that the daily inspection requirement is onerous and costly, meaning that glueboards are not always favoured and are usually a last resort, which minimises the number actually used.

One submitter commented that time left in any kind of trap, as well as method of euthanasia, requires regulation, although enforcement may be difficult. Two submitters felt that the real issue to be addressed with glueboards is the length of time animals are trapped, and so adequate check frequencies and prompt disposal would minimise the risk to the animal, without having to ban glueboard use.

3.4 ALTERNATIVE METHODS OF PEST CONTROL

Twenty-one of the 30 submitters commented on the availability and/or the feasibility of a transition from glueboards to alternative methods of rodent control.

Three submitters felt that alternatives to glueboards were already available and that a transition to using them was feasible. Two submitters commented that glueboards would naturally be phased out if a suitable alternative was available.

¹ Section 36 of the Animal Welfare Act requires 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.

Nine submitters felt that there are currently no direct alternatives to glueboards available for certain situations, such as in areas or rooms where food is produced or kept, or for control of pest lizards. Two submitters commented that there is unlikely to be a suitable alternative to glueboards available in near future.

Reasons submitters gave for why glueboards may be favoured over other methods were:

- They are the only method capable of catching rodents “on the run”.
- They are the only tool that can fit into narrow crevices and gaps, such as under fridges and on narrow ledges.
- They are non-toxic.
- They can be used in sensitive areas e.g. on aircraft, electrical areas, strict hygiene areas (dairy/food processing, hospitals), where poisons and other traps may not be able to be used.
- They are an effective tool against rodents that become shy of bait or other traps.
- They are cost-effective and are at no risk of being damaged if objects fall on them.
- They do not require an animal to eat bait or physically enter a trap.
- They can contain any biohazards (faeces, urine) as well as the trapped animal.
- They are used in boats travelling to predator-free islands as poison bait is not suitable (because of the risk to human and animal passengers) and spring traps can be triggered by the vibration of the travelling boat.

One submitter suggested that MAF should make money available immediately for research into suitable alternatives.

One submitter commented that after years of trialling alternatives to glueboards in the dairy industry, none were as effective as glueboards in terms of catch rate and food safety, and that the risk to dairy product integrity was too high to consider exclusive use of alternatives.

3.4.1 Integrated Pest Management

Eleven submitters commented that glueboards are an integral part of the “toolbox” or Integrated Pest Management approach, which uses a combination of control techniques for more effective pest control. This avoids reliance on any one method that may decrease in effectiveness over time e.g. due to trap/bait shyness. Several submitters commented that any “alternatives” were already used in conjunction with glueboards for greater catch efficiency, and that one alternative cannot simply replace another. Some submitters described glueboards as being used in conjunction with snap traps especially, which minimises the number of rodents caught on glueboards compared to if they were used alone, and also catches any rodents that may avoid snap traps. A few submitters commented that glueboards are often used as the last line of defence, after exclusion, sanitation and other control activities, and are essential in areas where there is a “zero tolerance” policy for rodents.

3.5 OTHER USES FOR GLUEBOARDS

Eight submitters highlighted four other applications for glueboards, besides rodent control.

3.5.1 Monitoring

Five submitters commented that glueboards are also used for insect and rodent monitoring, such as for monitoring the success of a control programme.

3.5.2 Biodiversity/Conservation areas

Three submitters commented that glueboards are used in biodiversity and conservation areas. For example, they are used on boats travelling to predator-free islands (as noted in 3.4 above) and for biodiversity surveys. Two submitters commented that glueboards need to continue to be available as a potential tool in case of a pest incursion in a high biodiversity/conservation area where a fast and effective response is required.

3.5.3 Control of other animals

One submitter noted that glueboards are an essential tool for controlling pest lizards. One submitter commented that they are also used to catch feral nuisance birds around buildings. Another submitter commented that glueboards are used in the live capture of specimens for blood or DNA sampling. Submitters also noted that they were used for insect monitoring and control.

3.5.3 Glueboards used for rodents vs. insects

The discussion paper noted that the proposal to prohibit the sale and use of glueboards applied to those glueboards intended to catch an animal as defined by the Animal Welfare Act, which does not include insects.

Four submitters commented that glueboards for insects and rodents, especially mice, are essentially the same and are interchangeable. One submitter commented that insects also become stressed when caught on glueboards.

RESPONSES TO SPECIFIC QUESTIONS IN DISCUSSION PAPER

3.6 PROPOSAL TO PROHIBIT USE OF GLUEBOARDS

Recommendation 1 in the discussion paper proposed that:

- 1a. The use of glueboards is prohibited immediately in any place, other than those places referred to in recommendation 1b.
- 1b. A glueboard may be used in the following places for five more years:
 - 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.

3.6.1 Immediate ban

Twenty-eight of the 30 submitters commented on the proposal to ban the use of glueboards immediately in all areas except inside food production premises where there is a high risk of contamination.

Of the 28 submitters who commented:

- eight supported the proposal;
- two suggested modifications to the proposal; and

- 18 indicated that they opposed or strongly opposed the proposal.

The eight submitters who supported the proposal did so based on the animal welfare concerns associated with glueboards and the availability of alternative pest control methods.

The two submitters who suggested modifications thought that places other than food production premises should also be given an exemption such as conservation areas, hospitals, and energy and telecommunications facilities. One other submitter agreed with the ban, unless there was a risk to public health.

Those who opposed the proposal made the following comments:

- Professional pest managers should be able to continue using glueboards in any situation, including for commercial and residential purposes, within agreed guidelines.
- There are no direct alternatives to glueboards.
- Glueboards are a safe alternative to anticoagulant poisons and traps around children and pets.
- Banning glueboards would create a risk to public health.
- They are an important control method for rodents, insects and invasive lizards.
- Glueboards are the single most effective rodent control device available.
- They are an important tool for all areas, not just food production (e.g. zoos, restaurants, dairies).

3.6.2 Phase-out period

Twenty-eight of the 30 submitters commented on the proposal to phase out the use of glueboards in strict hygiene areas of food production premises over five years.

Of the 28 submitters who commented:

- two supported the proposal;
- three suggested modifications to the proposal; and
- 23 indicated that they opposed or strongly opposed the proposal.

Support for the proposal was based on the animal welfare concerns associated with glueboards.

One of the modifications suggested was that if no appropriate and cost effective alternative is identified within five years, glueboards should continue to be permitted for use in these specified areas (i.e. food production premises). The other two suggestions for modification were to shorten the phase-out period to 1 or 2 years, given the animal welfare concerns.

Of the 23 submitters who opposed the proposal, 20 were opposed to banning the use of glueboards at all. Their comments included the following:

- There will be a risk to public health – there is a need for zero tolerance of rodent activity in food production areas.
- Use should be maintained in locations where glueboards are the most appropriate method of capture and where there is no effective alternative.
- No one method is suitable for all situations.
- If it is deemed appropriate to keep using them for five years, then why not continue in a controlled manner?
- They would naturally be phased out if more successful products became available.
- No alternative method is likely to be available after five years.

Three submitters felt that glueboards should be banned immediately in all areas. Their comments included the following:

- Glueboards are an inhumane way of trapping rodents – they are cruel and barbaric.
- Adequate resources must be put into advertising the ban and ensuring compliance.
- Alternatives are available already and a phase-out period is not required.

3.7 PROPOSAL TO PROHIBIT SALE OF GLUEBOARDS

Recommendation 2 in the discussion paper proposed that:

2. 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, effective immediately;
- ii) any person after five years.

3.7.1 Immediate ban

Twenty-four of the 30 submitters commented on the proposal to immediately ban the sale of glueboards to persons other than pest control operators or operators of food production premises. Of these:

- 13 supported the proposal;
- six suggested modifications to the proposal; and
- five opposed the proposal.

Ten of the 13 submitters who supported this proposal agreed that an immediate ban of the sale of glueboards to the general public is appropriate. Three submitters had no opinion but stated that the aims of NAWAC may not be met if the general public continued to have access to glueboards. Three submitters stated that the sale of glueboards should be limited to pest controllers.

The modifications suggested by six submitters were:

- An immediate ban should also include operators of food production premises.
- Sale should be restricted to pest control operators, operators of food production premises and “other approved operators”.
- “Pest control operators” is too broad – glueboards should only be used when part of a documented pest management programme.
- Approved users should be extended to include conservation managers.
- Better to have a five year phase out for residential users.
- Should be a gradual period in which supply is limited and then ceases. Public and shopkeepers should be allowed to use up existing stock.

Two of the five submitters who opposed this proposal stated that the general public should be able to continue to use glueboards in their homes for insect and rodent control. One submitter noted that many people cannot afford to hire pest control operators. Three submitters were concerned with the loss of use of glueboards in high biodiversity/conservation areas, such as rodent-free offshore islands, where a variety of control techniques is required for incursion management.

3.7.2 Phase-out period

Twenty-nine of the 30 submitters commented on the proposal for a five year phase out of the sale of glueboards to pest control operators and operators of food production premises.

Of the 29 submitters who commented:

- One supported the proposal;
- Five suggested modifications to the proposal; and
- 23 opposed the proposal.

The submission in support of the proposal noted that time left in any kind of trap, and the method of euthanasia and disposal require regulations, although these may be difficult to enforce.

The modifications suggested by five submitters were:

- The phase out period should only apply to pest control operators – all other users should be prohibited from using glueboards immediately.
- Glueboards should continue to be available after five years for incursion response in high biodiversity value areas and for disease management or monitoring.
- If no appropriate and cost effective alternative is identified within five years, glueboards should be permitted for sale and use in specified places (i.e. food production premises).
- Five years is too long – a 12 month phase out period is more appropriate.
- Five years is too long. Whichever phase-out period is used, the sale period should not continue right up to the point of prohibition.

Of the 23 submitters who opposed the proposal, 20 were opposed to banning the sale and use of glueboards at all and three felt that the sale of glueboards to anyone should be banned immediately.

Those who opposed the phase-out of the sale of glueboards made the following comments:

- There cannot be a phase-out period until a suitable replacement product is found, however, there is no indication that an alternative will be available in the foreseeable future.
- There will be a risk to public health – there is a need for zero tolerance of rodent activity in some areas e.g. food production premises, hospitals.
- Glueboards need to remain an option for pest control and should continue to be available to pest control operators and operators of food production premises, as well as conservation managers and other approved users.

3.8 MINISTERIAL APPROVALS

Recommendation 3 of the discussion paper proposed that:

3. 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, 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.

Twenty-one of the 30 submitters commented on this provision. Of these:

- 15 supported the proposal; and

- Six opposed the proposal.

The main comments of those submitters who supported the proposal were:

- The traps are inhumane, but effective, so in certain exceptional cases the Minister should be able to approve their use.
- A Minister must always be able to provide exemptions to laws and regulations. It is impossible to predict when the need to use a certain trap may arise.
- The approval process should be quick and efficient, as incursion or human health responses often require immediate action.
- The Minister should approve the sale to and use of glueboards by registered Pest Control technicians.
- An exemption should only be approved if it can be clearly demonstrated that there is no other alternative. The reason for exemption should not be solely for economic reasons.

Two of the six submitters who opposed the proposal felt that glueboards should be banned immediately in all areas and no special circumstances should apply. The remaining four submitters opposed any prohibition on glueboard use. One submitter felt that a ministerial exemption would not be feasible in times of urgency.

3.9 ALTERNATIVE PROPOSALS

Nineteen of the 30 submitters suggested alternative options to the proposals in the discussion paper. The majority of these proposed a combination of the following as the best way of addressing the animal welfare concerns associated with glueboards while allowing their use where needed:

- restriction to certain users (mainly pest controllers);
- education;
- industry standards; and
- ministerial approval for special cases.

3.9.1 Restrict ongoing sale and use

Twelve submitters suggested that the ongoing sale and use of glueboards be restricted to certain users or for use in certain areas so that they could continue to be sold and used beyond five years. Suggested restrictions included:

- Restrict sale and use to pest control operators, industry users, conservation managers and other approved users. Provide ministerial exemptions for special cases e.g. researchers².
- Limit sale to qualified pest controllers that are Approved Handlers under the Hazardous Substances and New Organisms Act 1996 – in the same way that other relevant commercial products are purchased.
- Permit use in food processing establishments until an appropriate alternative can be found.

3.9.2 Industry standards

Nine submitters suggested that industry standards or guidelines be developed that address the animal welfare concerns associated with glueboard use. The guidelines could ensure the

² Researchers would not require special exemption as the use of glueboards in research would already be exempt from any restrictions, providing normal research requirements under the Animal Welfare Act are met.

correct use of glueboards by highlighting the need for constant monitoring (and the legal requirements for checking), ensuring glueboards are used only when necessary (e.g. through extra reporting requirements) and describing how to dispose of caught animals humanely. These guidelines could be developed by MAF, industry (pest management and their customers) and NAWAC.

Three submitters noted that the Australian pest management industry has developed a set of guidelines that could be used as a starting point for New Zealand industry guidelines.

Two submitters suggested that the development of glue infused with anaesthetic may prevent suffering until an animal is euthanased.

3.9.3 Education

Five submitters suggested that some sort of education campaign (either for the general public or training for approved users only) and a change in labelling to include better operating instructions would help ensure correct and humane glueboard use.

3.9.4 No regulatory action

One submitter felt that there should be no regulatory action whatsoever and that the issue should be left to the individual operator, who can appropriately address any animal welfare issues. This submitter recommended that MAF review its animal welfare priorities and ensure that government and industry resources are focused on issues of importance to the New Zealand economy before committing any resource to legislation for rodent glueboard traps.

Appendix 1: 2008 Submissions on “Proposal to Prohibit the Sale and Use of Rodent Glueboard Traps”

#	Immediate ban in premises other than food production			5-year phase-out for strict hygiene areas of food production premises			Immediate ban of sale to persons other than pest control operators & operators of food production premises			5-year phase-out of sale to pest control operators & operators of food production premises			Ministerial exemption		Proposed alternative option	Notes
	Support	Modify	Do not support	Support	Modify	Do not support	Support	Modify	Do not support	Support	Modify	Do not support	Support	Do not support		
1	Should only be used under exceptional circumstances			Yes				Should also include operators of food production premises				Should only apply for pest control operators		Yes. The traps are inhuman but effective. In certain exceptional cases animal welfare may have to take a back seat		MAF should make money available immediately for research into alternatives that are suitable for dairies etc. Pest control operators need to be legally bound to check traps regularly (min of twice in 24hrs) to ensure animals left on for shortest time possible.
2			Strongly oppose ban			Strongly oppose ban		Restrict sale to pest control operators, food premises operators & other approved operators				Strongly oppose ban			Restrict sale to pest control operators, food premises operators, & other approved operators	Glueboard traps are a valuable tool. Also used for cockroach control & insect monitoring and to catch feral nuisance birds around buildings. Traps for mice & insects interchangeable & often identical. Insects also stressed when caught on glueboards. MAF should have at least one experienced, registered pest control operator on discussion panel board. Anticoagulant rodenticides also inhumane, possibly worse than glueboards - inconsistency.
3	Strongly agree					Should be banned immediately in all areas	Strongly agree					Should be banned immediately in all areas		No special circumstances should apply		Glueboard traps are cruel & barbaric. Adequate resources must be put into advertising the ban & ensuring compliance.
4	Yes					Should be banned immediately in all areas	Yes					Should be banned immediately in all areas				
5	Strongly agree					Should be banned immediately in all areas	Strongly agree					Should be banned immediately in all areas		The Minister should not be able to approve use		They are an inhumane way of trapping rodents. Alternatives are already available. Phase-out period not necessary.

#	Immediate ban in premises other than food production			5-year phase-out for strict hygiene areas of food production premises			Immediate ban of sale to persons other than pest control operators & operators of food production premises			5-year phase-out of sale to pest control operators & operators of food production premises			Ministerial exemption		Proposed alternative option	Notes
	Support	Modify	Do not support	Support	Modify	Do not support	Support	Modify	Do not support	Support	Modify	Do not support	Support	Do not support		
6			Oppose ban			Oppose ban						Oppose ban			Supports the development of a code of practice by MAF, the Pest Management Industry & the Food Processing industry to define best practice - professional pest managers should be able to continue to use glueboards following developed & agreed guidelines	No direct alternatives available for glueboards in some food or food support rooms. An integrated approach to pest management is vital. Will always be some in a population that will avoid a particular bait/trap or other device. Many options in use at the same time better controls rodents. Glueboards used where rodent activity is a threat to public health - zero tolerance for rodent activity in food premises.
7			Are the single most effective rodent control device available			If deemed appropriate to leave them for 5 years then why not continue in a controlled manner		"Pest control operators" too broad - Should only be used when part of a documented pest management programme.				If deemed appropriate to leave them for 5 years then why not continue in a controlled manner	Agree			Important tool especially for dairy and other food industries. Pest control operators should hold some NZQA unit standards for the task involved. Proposed use conditions (Rec 1 clause 1b) should be extended with addition of words, "by law, or where there is a customer requirement". Pest management not just about "control" - this is a last resort.
8																There is a large demand for glueboard use in Auckland. No opinion on proposals.
9			Oppose ban			Oppose ban	Limit sale to qualified pest controllers					Oppose ban			Limit sale to qualified pest controllers that are Approved Handlers under HSNO Act - the same way other commercial products are purchased.	Essential tool, especially for food processing areas where rodenticides not permitted. Sold for domestic market in \$2 shops & Asian wholesalers - these are generally of poor quality & open to risk of inexperienced users.
10			Oppose ban			5 years too simplistic						5 years too simplistic			Crown identifies and works with appropriate bodies/agencies or individuals to develop/test alternatives.	Rarely used glueboards in 10 yrs. Impose reasonable working conditions if must, but don't throw away potentially useful tool. There are situations that arise that call for a non-standard approach. 5 year phase out too simplistic - where does industry stand if no alternative is found after 5 yrs?

#	Immediate ban in premises other than food production			5-year phase-out for strict hygiene areas of food production premises			Immediate ban of sale to persons other than pest control operators & operators of food production premises			5-year phase-out of sale to pest control operators & operators of food production premises			Ministerial exemption		Proposed alternative option	Notes		
	Support	Modify	Do not support	Support	Modify	Do not support	Support	Modify	Do not support	Support	Modify	Do not support	Support	Do not support				
11			Important control method for rodents & invasive lizards			Are an appropriate tool for rodent control in these locations		Agree with banning sale to public. Approved users should be extended to include conservation managers & other approved users.				Should remain available to specific users. No indication that techniques of similar application will be available in the foreseeable future.	A Minister must always be able to provide exemptions to laws & regulations. Impossible to predict when the need to use a certain trap might arise.		Immediate ban of public sale and use. Allow sale and use by pest controllers, industry users (e.g. food/dairy), conservation managers and other approved operators. Also implement an education campaign on best practice use for approved users. Establish industry standards in pest control industry. Reduction in checking times to once every 12 hours.	Question whether glueboards properly set and serviced are markedly more inhumane than some other rodent trapping methods suggested, or than many of them if they are badly set or serviced. Humane disposal a matter of education/training of operator, maybe reinforced through industry standards, & is no different to that which applies to any other live capture trap. Situations where there are no viable alternatives (control of pest lizards) or where they are more effective for rodents than other traps or poisons. Removal from NZ market will make them difficult to obtain quickly & cheaply, jeopardising responses to pest incursions & conservation management (quarantine use for island reserves). Will also make it difficult to get them for legitimate use (biodiversity surveys). Glueboards for insects and rodents essentially the same. Only method capable of capturing rodents that are on the run. Only tool that can fit into narrow crevices and gaps. Must remain an integral part of arsenal of methods available. No one else has banned except Tasmania. Invasive rodents serious economic & ecological pests		
12			Important tool for all areas, not just food production (e.g. zoos, restaurants, dairies)			No alternative method likely to be available						Should not be limited to use by a certified person. Household users use as multi-trap for rodents & insects.			Cannot be a phase-out period until suitable replacement product is found	Agree	A good practice statement & advice on the correct use of pest control products should be part of the process of distributing and selling pest control products, which will satisfy NAWAC & ensure correct use by the householder. Wait until an alternative method is available before prohibiting or phasing out.	Probable that no alternative will be available in the future which is as effective. Have never received negative feedback about glueboards. Preferred tool over trap & bait stations by many people. Welfare of rodents vs. welfare of human population. Rodents are a health hazard - important that all possible means available for control. Clean & fast method - important part of tool box for rodent control. Can slip under fridges, fit on narrow ledges, in areas where bait stations & traps cannot be used. Snap traps can also be inhumane when death is not immediate.

#	Immediate ban in premises other than food production			5-year phase-out for strict hygiene areas of food production premises			Immediate ban of sale to persons other than pest control operators & operators of food production premises			5-year phase-out of sale to pest control operators & operators of food production premises			Ministerial exemption		Proposed alternative option	Notes
	Support	Modify	Do not support	Support	Modify	Do not support	Support	Modify	Do not support	Support	Modify	Do not support	Support	Do not support		
13			Not necessary or advisable			No one method is suitable for all situations		No objection to 5-yr phase-out for residential users				Pest control operators & operators of food production premises should not be restricted at all	Agree		Education in more effective use of methods always a high priority for pest control industry. Pest Control & Food Industry need to be able to make own informed decisions about industry it knows best.	Adequate provisions for AW already in place through AW Act. Would be in contradiction with NZFSA Food Control Plans, which include a recommendation that "sticky boards" may be used for pest & animal control. Agree there should not be undue suffering to animals. Costs to industry in terms of reduced availability of methods/more costly/alternatives. Important non-chemical tool. Industries face pressure to reduce use of toxicants & are actively promoting integrated pest management. Public health, ability to provide non-chemical control, food safety & preservation of assets outweighs concern of rodent on a glueboard.
14			Risk to public health			Risk to public health; need for zero tolerance						Risk to public health; need for zero tolerance.			Regularly inspected glueboards best option & would address NAWAC's concerns. Industry standards would be very beneficial, would highlight need for constant monitoring. Pest Managers should be able to continue using glueboards following guidelines developed & agreed to by MAF, Pest Management Industry & Food Processing Industry.	Alternative methods - cost is prohibitive or not suitable for food production facilities. Able to be used in confined spaces, no risk of being damaged if objects fall on them. Have never experienced negative feedback from public or international parties. Part of toolbox. If taken away, would be serious limits to effectiveness of rodent control. Last line of defence after exclusion, sanitation & other control activities, so limited numbers trapped on glueboards.
15			Rodents are a threat to public health. Glueboards are an effective safer alternative to anticoagulant poisons & traps (around children & pets).			Should not be phased out under any circumstances. Need to remain freely available or over the counter distribution.			To deny the public access to these safe & effective tools is to encourage spread of pestilence & disease. Many cannot afford pest control operators			Any ban or phase-out period is unacceptable.			Education programme with a change in labelling of existing packaging should be all that is required.	Combination of traps more effective than any single strategy. Rodents are smart & become bait-shy, jump over glueboards & trigger traps. Glueboards alongside traps are a fast & humane combination. Idiot-proof, non-toxic, cost-effective & do not need restrictions on use or sale. Regulation is unnecessary & will result in more off-target rodenticide poisonings, and spread of disease. Have seen massive local growth in rodent populations. Status quo is only solution.

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16			Are no direct alternatives. Many others cannot slip into areas where glueboards can. Other traps & devices may not be suitable for the situation.			Should be no phase-out period		Should be a gradual period in which supply is limited & then ceases. Public & shopkeepers should be allowed to use up existing stock.				Pest control operators should be allowed to continue using glueboards		Do not agree		Also used for monitoring, e.g. to see if there are cockroaches/crickets etc gaining access to a food processing facility (this use has no effect on animal welfare). Need for integrated pest management or toolbox approach. Always some rodents in a population that will avoid a trap or bait or other device. Traps & glueboards most effective when used at same time. Rats & mice are pests.
17	Agree			Agree						Agree						Time left in any kind of trap & method of euthanasia & disposal require regulations, although that may be difficult to enforce.
18								Does not recommend use of glueboards for general domestic rodent control. Concerned with loss of use in high biodiversity areas, i.e. mainland or off-shore islands where no rodents are & a variety of control techniques required for incursion management.				Supports phase-out, provided product continues to be available after 5 years for incursion response in high biodiversity value areas & for disease management or monitoring.		Approval process should be quick and efficient, as incursion or human health responses often require immediate action. System should be established, with agreed number of working days for processing applications.		Recognise AW concerns. Necessary tool in some situations. Valuable alternative as do not require animal to eat bait or physically enter a trap. Rodents carry disease - in the event of pandemic, all possible control methods must be available. Also play a role in live capture of specimens for blood or DNA sampling. Should remain available to professional pest controllers as an alternative control technique in biodiversity site incursions or disease management. Should be considered live-capture traps in these instances & retain current requirements for checking everyday within 12 hours of sunrise.

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19			Strongly oppose. Professional pest managers should be able to continue using glueboards in any situation, within agreed guidelines.			Strongly oppose. Professional pest managers should be able to continue using glueboards in any situation, within agreed guidelines.	The aims of NAWAC may not be met if public has continued access.					Use of glueboards by professional pest managers should not be phased out. Any phase-out proposal is premature in absence of sufficient suitable alternatives in foreseeable future.	Agree		Certified pest managers be permitted to continue to use rodent glueboards according to a set of guidelines developed by industry in association with NAWAC. Ministerial exemptions for special cases e.g. DOC, researchers. Maintenance of Approved Handler status of pest controller (renewed every 5 years by meeting requirements of HSNO & HASE Acts) could be extended to Animal Welfare Act to ensure compliance with glueboard guidelines. Guidelines (extra reporting etc) would ensure use only where considered necessary. Draft guidelines have been developed by industry.	Maintenance of public health standards must be a primary consideration. Nil tolerance in many areas. This can only be achieved if adequate tools are available for use. Glueboards integral part of integrated pest management toolbox. Contain biohazards, can find & remove caught rodent. No direct replacement in certain situations (shape, cost, use in sensitive areas), e.g. on aircraft, under fridges, electrical areas. "Alternatives" already used in conjunction with glueboards-more efficient when used together. Same boards used for cockroaches & mice. Fewer rodents are caught "possibly inhumanely" on glueboards than "humanely" in other traps - catch mice not attracted to other trap types. Potential hazard of rodents not restricted to food production areas. Development of anaesthetics in glue may prevent suffering until euthanased. Daily inspection costly & onerous, glueboards not favoured & usually are last resort, which minimises number actually used. No universally suitable multi-catch rat trap available. Also used for monitoring. Cannot use rodenticides in food manufacturing & storage facilities. Last line of defence after deterrence, exclusion.

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20		Agree, unless there is a risk to public health. Exemptions should not be restricted to food production only.				Strongly oppose phase-out of use in these areas by professional and registered pest control technicians.	Agree to ban immediate sale to those other than professional pest control operators					Sale to or use of glueboards by professional pest control operators should not be phased out	Should approve sale to, & use of, glueboards by registered Pest Control technicians		Risks to rodents could be mitigated by controlled use of glueboards by professional pest controllers with strict compliance with mutually agreeable methods of glueboard use.	Acknowledge that modifications & restrictions on glueboard use warranted in interests of animal welfare. Exemption should apply not only to food production premises-also transport & storage of food products, energy production & transmission, water supply facilities, wastewater treatment facilities, pharmaceutical sites, hospitals/public health facilities & telecommunications facilities (in interests of public health & integrity & security of public utilities).Agree there is undue suffering of rodents & birds arising from uncontrolled, indiscriminate & even unnecessary use of glueboards by untrained people. In certain situations, glueboards the most reliable & effective control tool for ensuring protection of food safety, health & utility sites from threats posed by rodents. Many years spent trialling alternatives to glueboards in dairy industry - none as effective as glueboards in terms of catch rate & food safety - risk to dairy product integrity too high to consider exclusive use of alternatives. Immediate catch benefits & capable of multiple catches.
21	Agree				If no appropriate & cost effective alternative is identified by 1 July 2014, glueboards shall continue to be permitted for use in these specified places (i.e. food production premises).		Agree					If no appropriate & cost effective alternative is identified by 1 July 2014, glueboards shall continue to be permitted for use in these specified places (i.e. food production premises).	Agree		Glueboards should be permitted to be used in food processing establishments until an appropriate alternative can be found that does not cause harm to rodents.	History of use proves glueboards are most effective & cost effective way for rodent prevention in dairy & food industry. Use as key component of risk management programme. Integrated Pest Management. Due consideration must be given to issue of public health, food safety & environmental quality. Use of glueboards directly relates to food safety, unlike leg-hold traps (purely for pest eradication).Policy of no rodenticide bait to be used where product could be contaminated-glueboards used only inside of buildings. Other options have been considered but not feasible-Rat Zapper/Electroimmobilisers, snap traps, Nooski.No alternative food-safe & cost-effective method available currently.

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22		Agree with banning use by general public. Want to maintain use for conservation staff i.e. in boats to off-shore predator free islands & quarantine rooms (last line of defence-rodents/invasive skink).				Use should be maintained in locations where glueboards are the most appropriate method of capture/where there is no effective alternative-no indication from pest control industry that alternative is likely to be available in near future.	Support immediate ban to general public.					Should remain available to these specified persons, which should also include conservation managers & other approved users.	Agree. No way of predicting future needs for these traps.		Immediately ban sale & use to general public, but maintain use for pest control & conservation operators. Restriction of use to only approved operators will greatly reduce concerns associated i.e. lack of checks, inhumane disposal. Will also maintain a vital instrument in battle against invasive species in key biodiversity areas.	Use in boats going to predator free islands as poison bait not suitable (human & animal passengers) & spring traps can be triggered by vibration of boat travelling. Main issue with this trap is incorrect use, namely lack of checks once set. Outright banning could harm NZ's international reputation for conservation management. Effective tool against rodents that become shy of bait or other traps. Don't use outdoors but are on standby in case of rodent incursion on an island-important to retain all necessary tools to respond quickly & effectively. Currently no effective alternative trap or device suitable for these conservation uses-not used extensively but do use in specialised circumstances. Losing use would create a gap in biosecurity & island quarantine processes. Boards used for rodents & insects virtually the same. Kill traps can also have same welfare concerns if animal caught but not killed.
23			Should always remain as an option for commercial & residential purposes.			Should always be an option. Would naturally be phased out if more successful products became available.						Should always remain an option	No need to go to Minister.		Should be used only by appropriate industries e.g. pest controllers, commercial businesses with contamination issues, DOC & MAF in certain situations.	Other options in paper very limited in effectiveness. Must retain as many options as possible to control rodents. Risk exporting product through contamination. Very few of the public know or use glueboards-mainly used by pest controllers & commercial food premises. When properly monitored cause minimal distress & pain. Longevity of glueboards use has always depended on better methods becoming available, which hasn't happened yet. Number of rodents likely to come into contact with glueboards is very low.

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24			Strongly oppose. Professional pest managers should be able to continue using glueboards in any situation, within agreed guidelines.			Strongly oppose. Professional pest managers should be able to continue using glueboards in any situation, within agreed guidelines.	No opinion, but aims of NAWAC may not be addressed if public has continued access.					Use of glueboards by professional pest managers should not be phased out. Any phase-out proposal is premature in absence of sufficient suitable alternatives in foreseeable future.	Agree		Certified pest managers be permitted to continue to use rodent glueboards according to a set of guidelines developed by industry in association with NAWAC. Ministerial exemptions for special cases e.g. DOC, researchers. Maintenance of Approved Handler status of pest controller (renewed every 5 years by meeting requirements of HSNO & HASE Acts) could be extended to Animal Welfare Act to ensure compliance with glueboard guidelines. Guidelines (extra reporting etc) would ensure use only where considered necessary. Draft guidelines have been developed by industry.	Maintenance of public health standards must be a primary consideration. Nil tolerance in many areas. This can only be achieved if adequate tools are available for use. Glueboards integral part of integrated pest management toolbox. Contain biohazards, can find & remove caught rodent. No direct replacement in certain situations (shape, cost, use in sensitive areas), e.g. on aircraft, under fridges, electrical areas. "Alternatives" already used in conjunction with glueboards-more efficient when used together. Same boards used for cockroaches & mice. Fewer rodents are caught "possibly inhumanely" on glueboards than "humanely" in other traps - catch mice not attracted to other trap types. Potential hazard of rodents not restricted to food production areas. Development of anaesthetics in glue may prevent suffering until euthanased. Daily inspection costly & onerous, glueboards not favoured & usually are last resort, which minimises number actually used. No universally suitable multi-catch rat trap available. Also used for monitoring. Cannot use rodenticides in food manufacturing & storage facilities. Last line of defence after deterrence, exclusion.

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25			Strongly oppose. Professional pest managers should be able to continue using glueboards in any situation, within agreed guidelines.			Strongly oppose. Professional pest managers should be able to continue using glueboards in any situation, within agreed guidelines.	No opinion, but aims of NAWAC may not be addressed if public has continued access.					Use of glueboards by professional pest managers should not be phased out. Any phase-out proposal is premature in absence of sufficient suitable alternatives in foreseeable future.	Agree		Welfare issues would be alleviated by allowing pest managers to continue use of glueboards but under guidelines agreed to by NAWAC, pest management industry & their customers. Already a process-pest manager must satisfy a Test Certifier every 5 yrs to renew Approved Handler status through ERMA - MAF requirement could be assessed at same time. Distributors to pest management industry must obtain Approved Handler number from intending purchasers- could apply to MAF- approved users of rodent glueboards. Course & guidelines could be developed. Small cost involved. Increase awareness of AW concerns by approved users. Ministerial exemptions for special cases e.g.DOC.	Australian Pest Management industry has developed guidelines for glueboards-could be used as starting point for NZ guidelines. Tasmanian Govt has extended Ministerial exemption to Licensed Pest Managers & requires them to work to these guidelines. If other methods developed that are able to be used in similar areas & with similar efficacy as glueboards, they will be phased out naturally. Zero tolerance of rodent pests in urban environment (to maintain public health)-different from management of vertebrate pests in forest environment. Rodent control very important. Integrated pest management. "Alternative" traps are not straight replacements for glueboards in most circumstances. Using snap traps & glueboards together is more effective than either alone & fewer die on glueboards than if using glueboards alone. Spain has reversed a previous decision to ban glueboards.Ban may put NZ's reputation at risk as a clean food exporter. Proposed eventual use only under Ministerial exemption not feasible in times of urgency & is hypocritical.

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26			Oppose ban			Oppose ban			Oppose ban			Oppose ban		Oppose	Education based training & developing industry standards would significantly reduce incidence of poor glueboard use. Supports updated labelling indicating correct use & a code of practice.	Essential tool in commercial (not just pest control industry) & sometimes residential pest control. Can capture, kill & contain rodent pests & excrement, parasites associated. Can be used where others cannot-e.g. difficult to reach areas, sensitive areas, where non-target animals/humans may be at risk (so cannot use poisons, electrocution devices etc).Integrated pest management-proactive. No one product replaces another-used in unison to gain superior control. Also used for monitoring. Are certain circumstances & areas where glueboards are only effective/suitable method-food production, commercial kitchens, zoos, airlines/commercial transportation, organic farming, stock warehouses. Importance of humanness acknowledged, but MAF's proposals would have significant impacts on health & safety of people & non-target animals stemming from poor rodent control that would eventuate-lower standards in sanitation, public health, misuse of other control techniques (baiting in areas not suitable for chemicals).No alternative developed yet.

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27			No regulatory action should be taken. Issue should be left to individual operator.			No regulatory action should be taken. Issue should be left to individual operator.			No regulatory action should be taken. Issue should be left to individual operator.			No regulatory action should be taken. Issue should be left to individual operator.		No regulatory action should be taken. Issue should be left to individual operator.	Should be no regulatory action. Issue should be left to individual operator, who can appropriately address any animal welfare issues. If MAF proceed with preferred option of prohibiting glueboards, this should only proceed for food production premises if a tool is available that is equally hygienic, effective & cost efficient.	Recommend that MAF review animal welfare priorities & ensures govt & industry resources are focused on issues of importance to NZ economy before committing any resource to legislation for rodent glueboard traps. Over-use of legislation to remedy an unquantified animal welfare issue. Recognises NAWAC's concerns. Used in areas where high hygiene standards required. Real issue to be addressed is length of time animals are trapped-adequate check frequencies & prompt disposal would minimise risk to animal. No info on extent of problem in NZ & justification for legislations. Introducing this legislation will increase costs & hygiene risk to meat industry. Few alternatives permitted in meat industry due to potential biological contamination & risk of escaping rodents. Supports clarification that proposals do not apply to insects. Issue is of minor importance to biosecurity, conservation, human health, animal health, food safety & food quality. Amount of consultation on a minority issue contributes negatively to govt aim of improving NZ productivity.

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28			Integral part of pest control contractors range of methods to control pests (cockroaches, rats, mice). Removal of this tool will severely restrict ability to effectively control pests in commercial environments where health & safety issues are paramount.			Important tool. Non-toxic so can be used in food manufacturing facilities where poison baits cannot. Don't agree that suitable alternatives are available. Kill & snap traps rely on pest eating bait to trigger trap. Rodents can be wary of traps/baits so glueboards likely to be more catch efficient. Noose/electrocution traps not practical for use on large scale.	Immediate ban on non-pest control operators would be appropriate					Use of glueboards by commercial pest control operators should be retained.	Agree		Retain the use of glueboards with the following provisos: Only allow sale & use by commercial pest control operators; Ensure there is a law passed that they need to be checked within 12 hours after sunrise, as is in place for live capture possum traps; Ensure that commercial operators have the skills & equipment to kill rodents humanely. These rules are acceptable for capture of possums in leg-hold traps.	Robust studies should be conducted to verify capture efficiency of glueboard traps with other traps. Demand for glueboard traps cannot be ignored-cost effective for commercial pest controllers as well as catch efficient. No evidence that glueboards are less environmentally sustainable than the alternatives. Development of new devices can take decades & it's very difficult to invent new & effective methods. Unlikely that any new tool for rodent control will appear on the market within 5 years. NZ companies have scant resources to undertake research & development. More studies required-2 papers inadequate to justify banning a valuable tool. More definite definition of what is humane is also required. No one else has banned glueboards except tasmania. UK allows glueboards & has formulated a code of practice-this country has very strong views on animal welfare.

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29	Strongly agree				Given the degree of suffering of caught animals, 5 years is too long - 12 months is more appropriate		Strongly agree				Given the degree of suffering of caught animals, 5 years is too long - 12 months is more appropriate		Agree, though it is hoped the Minister will never have to use such a provision			Concern over glueboard use has arisen from their sale through local hardware stores to general public for home use. It is likely that trapped rodents will suffer moderate to high levels of pain over a long period, which is unacceptable. Similar concerns with use of curiosity traps (checking times, inhumane disposal). Electrocuting devices supported. Poisons are a concern regarding their humaneness & possibility of non-target animal poisoning. Snap traps supported. Transition to alternatives is feasible. Difficult to police compliance with any inspection or euthanasia requirements-impossible to do this among residential users. Just as concerned over commercial use of glueboards. Likely to be inhumane whatever the situation. Would like to see a requirement that, for glueboards that are in use pending phase-out, they are to be checked every 6 hours & any animals captured are to be immediately humanely killed.
30	Agree is appropriate				Given the concerns, 5 years is too long - 1-2 years is appropriate		Agree is appropriate				5 years too long. Whichever phase-out used, not logical for sale period to continue right up to point of prohibition of use.		Only if it can be clearly demonstrated that there is no other alternative. Should not approve for solely economic reasons			Aware that glueboard traps pose major welfare compromise to animals-harm & distress during period trapped, potential length of time trapped, methods of disposal. A lot of work has already gone into alternative, more humane methods of pest control, & industries have already had substantial time to adapt their practices. Recognise importance of hygiene in food production premises, but don't accept another 5 years is necessary to change to other practices. Urine & faeces can drip out of glueboards if not handled carefully-many new technologies completely control trapped animal & all bodily discharges.