Analysis of Submissions:
Proposal to regulate the sale and use of specified leg hold traps
(Biosecurity New Zealand Discussion Paper: 2007/02)

MAF Biosecurity New Zealand Information Paper No: 2007/02

ISSN 1176-8401 (Print)
ISSN 1177-8709 (Online)
ISBN 978-0-478-29594-8 (Online)

July 2007
Disclaimer

Every effort has been made to ensure the information in this report is accurate.

The proposals in this paper do not necessarily represent agreed Government policy.

Requests for further copies should be directed to:

Natalie Nesbitt
MAF Biosecurity New Zealand
P O Box 2526
WELLINGTON

Email: natalie.nesbitt@maf.govt.nz

Telephone: 04-894 0454
Facsimile: 04-894 0730

Electronic copies of this submissions paper are available at:

© Crown Copyright - Ministry of Agriculture and Forestry
<table>
<thead>
<tr>
<th>Contents</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.  Introduction</td>
<td>1</td>
</tr>
<tr>
<td>2.  Submitters</td>
<td>2</td>
</tr>
<tr>
<td>3.  Issues raised in submissions</td>
<td>3</td>
</tr>
<tr>
<td>3.1 Alternative methods of pest control</td>
<td>3</td>
</tr>
<tr>
<td>3.2 Evidence that leg hold traps cause pain or distress</td>
<td>4</td>
</tr>
<tr>
<td>3.3 Costs of conversion to new pest control methods</td>
<td>5</td>
</tr>
<tr>
<td>3.4 Leg hold traps in certain areas</td>
<td>5</td>
</tr>
<tr>
<td>3.5 Ministerial approvals</td>
<td>6</td>
</tr>
<tr>
<td>3.6 Implementation</td>
<td>7</td>
</tr>
<tr>
<td>3.7 Modification of traps</td>
<td>8</td>
</tr>
<tr>
<td>Appendix 1: Submissions received on Proposal to regulate the sale and</td>
<td>9</td>
</tr>
<tr>
<td>use of specified leg hold traps (discussion paper no: 2007/02)</td>
<td></td>
</tr>
</tbody>
</table>
1. Introduction

In April 2007 the Ministry of Agriculture and Forestry (MAF) released a discussion paper entitled *Proposal to regulate the sale and use of specified leg hold traps* (discussion paper no: 2007/02) and invited submissions on the proposal. The paper presented a proposal to regulate leg hold traps under the Animal Welfare Act 1999.

The regulation would:

- prohibit the use throughout New Zealand of:
  - all long-spring leg hold traps of size 1.5 or larger from 1 January 2009;
  - all double coil spring leg hold traps larger than size 1.5 from 1 January 2009; and
  - all double-coil spring hard jaw leg hold traps of size 1.5 from 1 January 2011.
- Other leg hold traps such as the Victor1 and the Victor 1.5 (padded) are not affected by this proposal and could still be used;
- prohibit the sale of the above traps from 1 January 2008;
- prohibit all leg hold traps within 300 metres from a dwelling, or in any area where it is likely to catch a companion animal, from 1 January 2008; and
- enable the Minister to approve a person to use or sell an otherwise prohibited leg hold 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 leg hold trap means a trap with metal jaws designed with the primary purpose of catching and holding an animal by a limb, including the foot. The prohibition includes any situation where a leg hold trap is used as a trap, whether as a restraint trap or a kill trap.

In 2002 the National Animal Welfare Advisory Committee (NAWAC) recommended to the Minister of Agriculture that the importation, sale and use of certain leg hold traps be prohibited in New Zealand. The same year, MAF released a discussion document exploring policy options for each type of leg hold trap. Eighty public submissions were received on this paper. MAF also wrote to all local authorities asking about the bylaws they had in place for traps and the type of restrictions they would like to see in effect via a regulation under the Animal Welfare Act. In addition, MAF discussed policy options for leg hold traps with various individuals, organisations, government departments, and private companies. The current proposed regulation for leg hold traps was developed as a result of this process.

MAF placed the 2007 discussion paper on its website and directly notified all local authorities and 107 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 analysis of submissions provides a summary of the issues raised in submissions.

---

1 Throughout this document brand names are used to assist with identification of the traps discussed. This is not an endorsement by MAF of any particular product.
2. Submitters

MAF received 33 individual and joint submissions on the proposal.

Government departments 1
District or regional councils 7
Incorporated societies 1
Professional associations 1
Non-governmental organisations 4
Stakeholder groups 1
Private individuals 14

Fur hunters 1
Trappers 3
Animal welfare inspectors 2
Unspecified 8

Trap suppliers 2
Other industries that use traps 1
National advisory committees 1
3. Issues raised in submissions

This section is organised according to the issues listed below.
1 Alternative methods of pest control.
2 Evidence that leg hold traps cause pain or distress.
3 Costs of conversion to new pest control methods.
4 Leg hold traps in certain areas.
5 Ministerial approvals.
6 Implementation.
7 Modification of traps.

3.1 ALTERNATIVE METHODS OF PEST CONTROL

3.1.1 Effective control of particular species

Many submitters considered there to be effective pest control alternatives to the leg hold traps proposed for prohibition, most notably the Victor 1 leg hold trap. Other submitters considered that the leg hold traps proposed for prohibition are the most effective control option for particular species. These comments are detailed below.

Rabbits

Two regional councils opposed the phasing out of Lanes-Ace traps on the grounds that they are the only trap that can effectively target rabbits. The councils submitted that long spring traps such as the Lanes-Ace are specifically designed to spring up as the jaws close, which is essential for the proficient trapping of rabbits. The councils considered that given the ability of rabbits to recover quickly after poison operations and to develop bait-shyness, it is important that a viable rabbit trapping alternative is retained. Another submitter considered that Lanes-Ace traps are more likely to catch rabbits than the Victor 1 because the foot plate is larger.

Large possums

A small number of submitters commented that Victor 1.5 hard-jaw traps are the most effective leg hold traps for controlling larger possums that may maintain bovine tuberculosis (Tb) and should therefore not be prohibited.

Ferrets

A small number of submitters indicated that the leg hold traps proposed for prohibition are effective when set as kill traps for ferret control. The use of leg-hold traps in this way was considered to be one of the few effective ferret control methods.

Larger animals such as pigs, wallabies, feral cats and dogs

Some submitters considered that prohibiting hard-jaw Victor 1.5 and 3 traps limits the control tools available for pigs to cage traps and shooting. One submitter considered that cage traps are unproven in New Zealand and shooting can be effective but is controversial on animal welfare grounds. Another submitter considered that leg hold traps are preferable to the use of dogs for hunting pigs, being cheaper and more humane. Submitters noted there is currently no poison approved for the control of feral pigs in New Zealand.
One submitter commented that prohibiting hard-jaw Victor 1.5 and 3 traps limits the control tools available for wallabies to 1080 poison, cage trapping and shooting and that cage trapping and shooting is not as effective in many situations. Additionally, this submitter gave an example where wallabies were able to escape from Victor 1.5 soft jaw traps under wet conditions, however, when traps were changed to hard-jaw Victor 1.5 and 3 traps, catch rates increased markedly.

A regional council submitted that trapping is not the first control option for pigs or wallabies but should be available if required.

3.1.2 Operational circumstances

Some submitters considered leg hold traps to be the only practical option for pest control in operational circumstances where:

- live capture traps like box or cage traps and some kill traps are bulky to carry;
- the application of poison baits may be unacceptable or constrained for a number of reasons including:
  - landowner or public objections to the use of toxins;
  - the need to manage bait- or toxin-shy vector populations;
  - risks to livestock, domestic animals or other valued non-target species;
  - public health risks;
  - residue risks in livestock or game products destined for human consumption;
  - concerns over contamination of water supplies or the wider environment;
  - target or non-target animal welfare considerations; and
- the use of firearms can be hazardous in built up areas.

3.1.3 Restrictions on alternatives to leg hold traps

Several submitters commented that the review of leg hold traps coincides with proposals to consider the future use of some pesticides used for vertebrate pest management, such as 1080. One submitter felt that should the industry be faced with increasing restrictions on the use of both traps and pesticides, the future costs of control will increase significantly and the impacts on our economy, environment, and society in general will be widely felt.

3.2 Evidence that leg hold traps cause pain or distress

A small number of submitters felt that the proposal to ban some leg hold traps was based on a subjective view that all leg hold traps are inhumane with limited scientific evidence. One submitter expressed concern that consideration was seemingly being given to prohibiting no.1.5 hard-jaw traps based on the results of tests on one species (possums) and without testing the humaneness of no.3 traps on pigs or wallabies. Two submitters suggested that a species-by-species approach to regulation, as distinct from a trap-type approach, may have some merit.

Many submitters considered that the leg hold traps proposed for prohibition have been found to be inhumane as they did not meet NAWAC guidelines on the humane use of traps and/or because in field situations they cause the worst injuries to target and non-target species. Some submitters commented that leg hold traps have already been banned in other countries on the grounds that they cause unacceptable levels of pain or distress.
3.3 COSTS OF CONVERSION TO NEW PEST CONTROL METHODS

About half of the 33 submitters commented on the costs of converting to new leg hold traps such as the Victor 1, which could still be used under the proposal. No comments were received on the costs of converting to alternative methods of pest control, such as kill traps, poisons, or shooting.

Many considered that some contractors have a considerable financial investment in Victor 1.5 hard-jaw traps but that the three year phase out period proposed provides adequate time for replacement of traps. One submitter estimated the total cost of replacing all Victor 1.5 hard-jaw traps in New Zealand with Victor 1 traps at $94,500, based on sales over the last 10 years. A small number of submitters considered that the impact on some contractors would be severe enough to threaten the viability of their business. One submitter commented that trappers make a long term one-off investment in traps and would not be able to finance their replacement.

Many submitters, including contractors and some local authorities, advised that they do not use Lanes-Ace traps. A major trap supplier considered that most trappers previously using Lanes-Ace traps have already transitioned to the more compact traps and advised that Lanes-Ace traps have not been imported for many years. [A government department] advised that it uses modified Lanes-Ace traps for rabbit control and while it could comply with a one year phase out period, there would be considerable costs in transitioning.

One regional council considered that time spent removing and replacing prohibited traps in remote areas, and lower catch efficiency of the replacement traps, would confer additional costs.

Some submitters proposed that the government fund a buy-back or exchange scheme for prohibited traps. Submitters suggested that such a scheme would create an incentive for trappers to comply with the regulation and also bring animal welfare benefits by speeding up the replacement of traps not banned until 2011.

3.4 LEG HOLD TRAPS IN CERTAIN AREAS

24 of the 33 submitters commented on the proposal to ban the use of all leg hold traps in certain areas. Recommendation 3 in the discussion document proposed that from 1 January 2008 no leg hold trap may be used:

i) 300 metres from any dwelling; and

ii) in any area where it is likely to trap a companion animal.

Of the 24 submitters that commented:

• three supported the proposal;
• 16 suggested modifications to the proposal; and
• five indicated that they opposed or strongly opposed the proposal and did not suggest modifications.

Almost all submitters recognised the need to address the risk of by-catch of companion animals and many commented that this risk needs to be balanced against the benefits of pest control. Most submitters did not agree with the particulars of the proposal. The main concerns with recommendation 3(i) were:

• a 300m exclusion zone would result in significant areas of land being removed from areas where leg hold traps are used for pest control;
• although there are alternative traps that could be used for pest control near dwellings, the restriction would impact on trap catch performance monitoring which currently requires the use of no.1 double coil spring traps;
• it is unlikely that the exclusion will greatly reduce potential impacts on domestic cats that regularly roam more than 300m and up to 10km from dwellings. The risk of capture within 300m of a dwelling may be similar for some animals as the risk of capture within 3000m; and
• 300 metres is an arbitrary distance as the movement of domestic pets is impacted by season, food supply, geography, weather and the nature of the animal.

The main concerns with recommendation 3(ii) were:
• it places the onus entirely on the trapper to prevent companion animals being caught and none on the owner;
• there are a number of sites around New Zealand where the Department of Conservation (DOC) actively controls feral cats with leg hold traps for conservation purposes within the home ranges of domestic cats and can expect to catch a domestic cat at some time. Likewise, there are a number of sites around New Zealand where DOC undertakes pest control using leg hold traps where the public walk their dogs;
• it is unclear at what point a companion animal becomes feral. In some cases DOC has had to resort to trapping lost pig dogs to mitigate their impacts on threatened bird species.

Several submitters suggested modifications to the proposal to address their concerns.  
• one submitter suggested 3(i) should be changed to “300m from any permanently occupied dwelling” and that 3(ii) should not be adopted;
• several submitters, including several local authorities, suggested:  
  ‘From 1 January 2008, no leg hold trap may be used:  
  (i) within 150m of any dwelling without the express permission of the occupier; and  
  (ii) in any area where there is an obvious risk of catching a companion animal;
• some submitters suggested the 300m exclusion should be extended to 400m, 500m, or 1km.

Other comments on the proposal included:
• promoting NPCA guidelines for safe and humane trapping will minimise by-catch of non target animals as users will be better educated in appropriate trap use;
• leg hold trapping should be treated as other pest control methods currently are and permission gained from landowners before operations take place;
• trapping notices should be required for trapping operations;
• the proposal already addresses concerns with domestic animal by-catch by restricting the use of leg hold traps to those that have been found to cause the least injuries and trauma.

3.5 MINISTERIAL APPROVALS

20 of the 33 submitters commented on the ministerial approvals provision. Of these:  
• 14 supported the proposal;
• four suggested modifications to the proposal; and
• two opposed the proposal, one because they considered that no exemptions should be made and the other because they considered a system of approvals would be unworkable.
The majority of submitters agreed that the Minister should be able to approve people to use otherwise prohibited leg hold traps. Several submitters commented that the approval process should not result in extensive delays, as this may have serious biosecurity repercussions, or incur unreasonable administrative costs. One submitter commented that approvals should be able to be obtained through local MAF offices. Another submitter felt that Parliament should approve exemptions rather than the Minister of Agriculture in order to avoid prejudice.

A major trap supplier advised that as the largest importers of traps in New Zealand they would not import or stock prohibited traps. Further, any special order for an approval would take 12-16 weeks to source and would be considerably more expensive than major stock orders.

3.6 IMPLEMENTATION

3.6.1 Phase out periods for use of traps

19 of the 33 submitters commented on the proposed phase out period for the Lanes-Ace trap and similar traps. Of these:
- three considered they should not be banned at all;
- one felt that each existing trap should be able to be used until no longer effective;
- seven agreed or indicated they could comply with the proposed one year phase out period;
- six considered that they should be phased out before one year; and
- two considered that they should be banned immediately or as soon as possible.

23 of the 33 submitters commented on the proposed phase out period for the Victor 1.5 hard-jaw traps and similar traps. Of these:
- three considered they should not be banned at all;
- two felt that three years is not long enough with one commenting that each existing trap should be able to be used until no longer effective;
- 11 agreed or indicated they could comply with the proposed three year phase out period;
- six considered that they should be phased out before one year; and
- one considered that they should be banned as soon as possible.

21 of the 33 submitters commented on the proposed phase out period for traps larger than Victor 1.5 and similar traps. Of these:
- three considered they should not be banned at all;
- one felt that existing traps should be able to be used until no longer effective;
- 12 agreed or indicated they could comply with the proposed one year phase out period;
- four considered that they should be phased out before one year; and
- one considered that they should be banned as soon as possible.

3.6.2 Phase out period for sale of traps

The majority of submitters supported a one year phase out period for the sale of leg hold traps proposed for prohibition. While some agreed with the phase out period on sale, they considered that existing traps should be able to be used until no longer effective. A major trap supplier considered that a one year phase out period on sale does not take account of the business of importing and stock control. The submitter emphasised that the date must be extended by at least two years to be workable or practical for them.
3.6.3 Public awareness and education
Several submitters commented that in order to achieve compliance with a prohibition of traps like the Lanes-Ace, it will be necessary to carry out a major public awareness and education campaign regarding the proposed phase out period.

3.6.4 Definitions
Concerns were raised by some submitters over the following definitions used in the discussion paper:
- “dwelling” should be defined to exclude DOC huts;
- “companion animal” is a vague term and should be defined as domestic cats and dogs;
- leg hold trap types should be defined differently or distinguished from each other in a different way. Some submitters proposed alternative methods for defining various trap types.

3.6.5 Checking traps
Some submitters felt that leg hold traps should be checked more frequently than is required under the Animal Welfare Act 1999.

3.7 MODIFICATION OF TRAPS

MAF considers that prohibited traps should not be able to be modified (for example, Victor 1.5 hard jaw traps fitted with padding) as an improved standard of animal welfare cannot be assured.

One submitter advised that DOC currently uses Lanes-Ace traps that have been modified to address animal welfare issues by fixing soft rubber pads to the jaws and lengthening the chains. A shock cord has also been inserted into a loop in the chains to act as a shock absorber. Another submitter commented that 1.5 soft catch traps should be modified with the chain swivel moved to the base centre hold to reduce damage to small animals like possums. The submitter noted that Victor 1 traps are modified to fit into an aluminium bracket for raised sets in Kiwi areas and commented that modification of traps by individuals can result in important innovations that can be of great value to the industry.
### Appendix 1: Submissions received on Proposal to regulate the sale and use of specified leg hold traps (discussion paper no: 2007/02)

<table>
<thead>
<tr>
<th>#</th>
<th>proposed phase out period</th>
<th>300m from dwelling</th>
<th>ministerial exemption</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>too long</td>
<td>too long</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>too long</td>
<td>agree</td>
<td>agree</td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>pay-back scheme</td>
<td>too short</td>
<td>no alternatives available</td>
<td>50m with occupier's consent</td>
</tr>
<tr>
<td>5</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>could comply - considerable cost</td>
<td>could comply</td>
<td>could comply</td>
<td>300m from any permanently occupied dwelling and do not adopt 3(b)</td>
</tr>
</tbody>
</table>

**Notes**

1. Too long - too long
   - Companion animals being trapped in Gin traps
2. 300m or less from any dwelling
   - MAF/Minister can't be trusted. Parliament to approve exemption
   - Kill traps and padded traps are available as alternatives. Victor 1 should be banned.
3. Traps should be checked more frequently than is required by law. Definition of dwelling? Definition of companion animal unclear. Comment on snares.
4. Traps should be checked more frequently than is required by law. Support proposal to make the traps illegal.
5. DOC is using a modified Lanes-Ace. Limited alternatives for pigs, wallaby, feral cats and dogs. Cage traps, shooting and soft jaw traps are not as effective. Other methods also pose animal welfare concerns. Ban should be on a species basis. Does not allow for future improvements in leg hold traps.
<table>
<thead>
<tr>
<th>#</th>
<th>Lanes Ace</th>
<th>Victor 1 1/2</th>
<th>Victor 3</th>
<th>300m from dwelling</th>
<th>ministerial exemption</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>7</td>
<td>no ban - most effective trap</td>
<td>no ban - no alternatives</td>
<td>dwelling owners would not set traps for their own pets</td>
<td>support proposal</td>
<td>modify proposal</td>
<td>do not support proposal</td>
</tr>
<tr>
<td>8</td>
<td>7</td>
<td>support proposal</td>
<td>modify proposal</td>
<td>do not support proposal</td>
<td></td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>supporting proposal</td>
<td>modify proposal</td>
<td>do not support proposal</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>too long - now</td>
<td>too long - 1 yr</td>
<td>too long</td>
<td>400-500m + trapping notices</td>
<td>support</td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>no use in urban areas</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12</td>
<td>agree</td>
<td>agree</td>
<td>agree</td>
<td>placed anywhere with permission of occupier. 150m is consistent with MoH recs for use of toxins near dwellings.</td>
<td>placed anywhere with permission of occupier. 150m is consistent with MoH recs for use of toxins near dwellings.</td>
<td>support</td>
</tr>
<tr>
<td>13</td>
<td>too long - now</td>
<td>too long - 6 mths</td>
<td>too long - 6 mths</td>
<td>further than 300m + trapping notices</td>
<td>do not support</td>
<td></td>
</tr>
<tr>
<td>14</td>
<td>ASAP</td>
<td>too long - 2yrs</td>
<td>agree</td>
<td>50m</td>
<td>support</td>
<td>Companion animal?</td>
</tr>
</tbody>
</table>
### Analysis of Submissions: Proposal to regulate the sale and use of specified leg hold traps

<table>
<thead>
<tr>
<th>#</th>
<th>proposed phase out period</th>
<th>300m from dwelling</th>
<th>ministerial exemption</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>15</td>
<td>too long - 6 mnths</td>
<td>too long - 1 yr</td>
<td>support proposal</td>
<td>do not support proposal</td>
</tr>
<tr>
<td>16</td>
<td>agree but buy-back scheme necessary</td>
<td>agree with ministerial exemption</td>
<td>occupier consent required. Where not received - 150m from dwelling</td>
<td>support</td>
</tr>
<tr>
<td>17</td>
<td>agree</td>
<td>agree</td>
<td>agree</td>
<td>strongly oppose. Advise landowners that an operation is in place. Use bylaws</td>
</tr>
<tr>
<td>18</td>
<td>agree</td>
<td>agree</td>
<td>support</td>
<td></td>
</tr>
<tr>
<td>19</td>
<td>too long - now</td>
<td>too long</td>
<td>switch order of phrases</td>
<td>support</td>
</tr>
<tr>
<td>20</td>
<td>no ban - most effective trap. Used in conjunction with a shock absorber and</td>
<td>no ban</td>
<td></td>
<td>Should be looking at all methods used to kill possums - some cause possums more stress than leg hold traps. Leg hold traps only toxin-fee cost effective option available.</td>
</tr>
<tr>
<td>#</td>
<td>proposed phase out period</td>
<td>300m from dwelling</td>
<td>ministerial exemption</td>
<td>Notes</td>
</tr>
<tr>
<td>----</td>
<td>--------------------------</td>
<td>------------------</td>
<td>----------------------</td>
<td>-------</td>
</tr>
<tr>
<td></td>
<td>Lanes Ace</td>
<td>Victor 1 1/2</td>
<td>Victor 3</td>
<td></td>
</tr>
<tr>
<td></td>
<td>extra swivel</td>
<td>support proposal</td>
<td>modify proposal</td>
<td>do not support proposal</td>
</tr>
<tr>
<td>21</td>
<td>agree</td>
<td>agree</td>
<td>strongly oppose</td>
<td>support</td>
</tr>
<tr>
<td>22</td>
<td>strongly oppose</td>
<td></td>
<td>some mechanism is necessary to approve the use of specific traps for specific purposes on specific properties</td>
<td></td>
</tr>
<tr>
<td>23</td>
<td>no ban</td>
<td>no ban</td>
<td>no ban</td>
<td>oppose</td>
</tr>
<tr>
<td>24</td>
<td>no ban. Only agree if there is an exemption for rabbit control.</td>
<td>agree but with buy-back scheme</td>
<td>occupier consent required. Where not received - 150m from dwelling</td>
<td>support - should not need to be accessed on a day to day basis.</td>
</tr>
<tr>
<td>#</td>
<td>Lanes Ace</td>
<td>Victor 1 1/2</td>
<td>Victor 3</td>
<td>support proposal</td>
</tr>
<tr>
<td>----</td>
<td>-----------</td>
<td>--------------</td>
<td>----------</td>
<td>------------------</td>
</tr>
<tr>
<td>25</td>
<td>agree</td>
<td>agree</td>
<td>agree</td>
<td>Rather than set a distance, propose that methods of best practice be promoted</td>
</tr>
<tr>
<td>26</td>
<td>should be minimal</td>
<td>should be minimal</td>
<td>should be minimal</td>
<td></td>
</tr>
<tr>
<td>27</td>
<td>use until no longer effective</td>
<td>use until no longer effective</td>
<td>use until no longer effective</td>
<td>support</td>
</tr>
<tr>
<td>28</td>
<td>Ban the import of wild fur and dog and cat fur. All leg hold traps should be banned.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>29</td>
<td>Agree with proposal to end sale of specified traps but existing ones should be used until no longer effective. Will not stop using the traps without compensation.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>30</td>
<td>agree but should be retained for specialist work after 2011</td>
<td>agree</td>
<td>approved restriction may work in urban areas but not in rural areas</td>
<td>approvals through local MAF offices. Would like to see continuation of bylaws to restrict traps near suburbia</td>
</tr>
<tr>
<td></td>
<td>proposed phase out period</td>
<td>300m from dwelling</td>
<td>ministerial exemption</td>
<td>Notes</td>
</tr>
<tr>
<td>---</td>
<td>--------------------------</td>
<td>---------------------</td>
<td>-----------------------</td>
<td>-------</td>
</tr>
<tr>
<td></td>
<td>Lanes Ace</td>
<td>Victor 1 1/2</td>
<td>Victor 3</td>
<td>support proposal</td>
</tr>
<tr>
<td>31</td>
<td>agree - proviso from one agency that it is retained for rabbit control</td>
<td>agree</td>
<td>agree</td>
<td>no leg hold trap may be used within 150m without permission from the occupier or within 300m if likely to catch a companion animal.</td>
</tr>
<tr>
<td>32</td>
<td></td>
<td>no leg hold trap may be used within 150m without permission from the occupier and in any area where there is an obvious risk of catching a companion animal.</td>
<td></td>
<td>More work is needed to ascertain whether the Victor 1 is an effective replacement for the 1.5 and Lanes-Ace for possum control and as kill traps for ferret control. MAF/NAWAC should discuss this with vector control contractors. Significant costs - equitable means of allocating these costs should be found otherwise there will be problems with compliance. Pest welfare benefits of replacing size 1.5 with 1 would be marginal in relation to the cost and possible adverse impacts on vector control operations of such an intervention. Wider discussion on pest welfare benefits compared with the benefits of pest control needs to happen. See submission for detail.</td>
</tr>
<tr>
<td>33</td>
<td>vague. Trapping notices</td>
<td></td>
<td></td>
<td>Buy-back scheme/compensation has the potential to bring real welfare benefits by speeding up the replacement of traps that will not be banned until 2011. Wider issue of whether the use of leg hold traps as kill traps should be allowed at all.</td>
</tr>
</tbody>
</table>