NORTH EAST MOUNTAIN TRUST

A quality future for Hillwalkers and Mountaineers

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Scottish Executive Environment & Rural Affairs Department, Wildlife Crime and Licensing Team, Landscapes and Habitats Division, 1J South, Victoria Quay, EDINBURGH. EH6 6QQ

21st February, 2007

Dear Sirs.

Consultation on Snaring in Scotland:

I would respectfully ask that you accept this letter as a response to your request for comments on your consultation document.

It is North East Mountain Trust's opinion that the question of snaring <u>cannot</u> be looked at in isolation. Other aspects such as corvid control / Anderson traps, gralloch/carcase middens, deer fencing and electronic fencing on open moors are all part of a greater wildlife protection and vermin control picture and it is therefore hoped that the consultation process will keep these important points in mind before making any final recommendations or passing pertinent and effective legislation.

Speaking personally as a regular hill-walker, I have had over fifty year's experience of walking on the Scottish hills and moors. On two occasions, my dogs have been caught in snares – set, I believe, for foxes. One was caught by his leg; the other by his mouth and the back of his neck. Both were rescued quickly, before any permanent damage could be inflicted. In addition, I have witnessed the indiscriminate placement of snares sometimes in large numbers, on paths/tracks used by more than the target prey. The former incident to my dog was where he was caught in one of some 15 snares laid over the relatively short space of 200 yards on an unfrequented woodland path.

I have also spoken and communicated with professionals such as Veterinary surgeons, Wildlife experts along with other, non-professional hill users, both dog owners and otherwise. Consequently, this response is based on the general consensus of a fairly large and representative cross sample of outdoor people.

The three options in your consultation paper are:

1) **DO NOTHING - STATUS QUO**:

The current system is blatantly not working. Non-targeted species such as Hares, Badgers and small Deer are the innocent victims of snares and, irrespective of the type of snare used i.e. free running or self locking, they can suffer either severe injury, either directly or self inflicted or at worst a lingering death. The last point is inevitable where the requisite 24-hour inspection is not being carried out. This is similar to the situation regarding "Corvid" traps where the carcases of birds such as Raptors up to the size of Buzzards are being left for unacceptable periods. Likewise, the use of snares, linked to their positioning around open, long term carcase middens in certain estates is highly questionable even if only from a moral standpoint. The visual and malodorous impacts are less than acceptable.

Such practices, if known to and publicised by the tabloid press would be dramatic, to say the least. One has only to look at the shambles at present of the so-called deer containment policy and its impact via the media!

The retailing of snares, on an unlicensed basis, makes it easy for the wrong people to acquire them, albeit for supposed legitimate and/or domestic purposes. They or the component parts thereof, are too readily available through normal outdoor outlets and/or the internet.

2. IMPLEMENTATION OF TECHNICAL IMPROVEMENTS DETAILED IN CONSULTATION

Whilst the difference between free running and self-locking snares is fairly obvious, it is equally evident that any free running snare can readily become a self-locking one should, for example, it become kinked during a struggle. Should this happen when pressure is at the maximum, then the end result is inevitable.

- How frequently should a snare be tested to determine its efficacy?
- Who is to undertake the testing?
- Technical improvements, allied to improved policing, are all very well, but who is to provide the extra vigilance and monitoring required?
- Self-locking snares would require to be of a pre determined size and, again, how does one eliminate their capturing the wrong target or indeed a non-target?
- How do we get rid of all other, non-improved existing snares?
- Who is to police that aspect?

3. PROHIBITION OF USE OF SNARES IN SCOTLAND IN RELATION TO ALL SPECIES:

At present, Scotland, through being part of the U.K. is one of only five countries in Europe that still allows the use of snares. It is understandable therefore that many animal welfare organisations are at the forefront of the demand for a total ban. The application of snares can be brutal, there are too many loose ends regarding retail, distribution, maintenance and ownership and it is extremely difficult, if not impossible to police any operational system efficiently. It is likewise impossible to target snares definitively at specific species – no snare can differentiate between a fox and a badger, a rabbit or an otter etc.

To summarise:

From the above, the following would pertain:

- Should snare positioning and data collation be a pre-requisite of inspection control?
- Who can guarantee that all snares are so covered?
- Who monitors the sale of snares or their component parts?
- Who can guarantee no use of d.i.y. contrivances from easily obtained material from B & Q et al?
- Who maintains the central and core records?

Wildlife as such, knows no boundaries as set by humans and any legislation must give effective cover on a countrywide and species-wide basis to ensure the desired end result – to the benefit of both man and beast. The use of snares is inhumane, there are too many loopholes in their practice and policing and even the acknowledged high rate of captured non-target species at 40+% is unacceptable.

This last point again comes down to the lack of effective maintenance and inspection of the set traps, frequently, because too much is being asked of those delegated to undertake such duties. Given the current "green attitude," should the consumption of fuel for both setting / maintenance and policing be a significant factor? Far too many rules are being bent, if not broken and all things considered, we are of the opinion that the best way forward is for a total ban to become the norm on a country wide basis.

I trust you will find the foregoing useful, but, if I can be of further assistance or if you have any queries, please do not hesitate to get in touch.

Yours faithfully, **Gordon Strachan** Treasurer, North East Mountain Trust.