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RSPB Cymru

David Rowlands AM
Petitions Committee
National Assembly for Wales
Cardiff Bay
Cardiff
CF99 1NA

12 July 2018

Dear Chair,

Re: Petition P-05-813 - Ban the USE of LARSEN TRAPS

Thank you for seeking the RSPB's views in respect of this petition. We note that the primary thrust of the petition stems from the petitioner's concern regarding animal welfare issues arising from the use of Larsen traps. Although RSPB Cymru is an organisation focussed primarily on wildlife conservation and with no particular expertise on animal welfare, we do strongly support high welfare standards.

We are aware that misuse or abuse of Larsen traps can have negative welfare impacts. The risk of these impacts should be mitigated by correct adherence to the terms and conditions that authorise the traps' use. Where poor implementation of welfare terms and conditions occurs, this needs to be addressed by effective enforcement and by having underlying general licences that are fit for purpose. (As the Minister noted in her letter to the Committee of 23 April, the general licences, which in Wales are issued by NRW under the Wildlife and Countryside Act 1981 as amended, allow authorised persons to kill or take certain 'pest' species for specified purposes).

We do not oppose the use of Larsen traps in principle when this is done in strict accordance with the relevant legislation and, ideally, by operators prepared to go voluntarily beyond the

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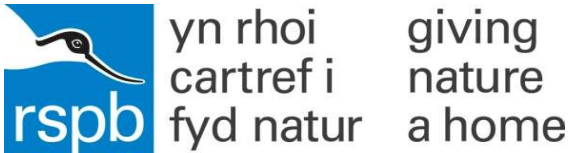


Mae'r RSPB yn aelod o BirdLife International, partneriaeth o gyrrff cadwraeth sy'n gweithio i sicrhau cartref i fyd natur o amgylch y byd.

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minimum standards required by the legislation. However, we do have a number of serious concerns both about the inappropriate deployment of Larsen traps and about the purposes for which the general licences themselves are used, in some circumstances.

The very lightly regulated nature of Larsen trap use lends itself to deliberate misuse. For example, we are aware of cases where they have been used to carry out bird of prey persecution masquerading as legitimate corvid control. This has to some extent been mitigated by improvements in terms and conditions (e.g., the removal of pigeon species as authorised decoys; pigeons are in effect bait rather than decoys and are used to attract and kill protected birds of prey) but the concern remains and we continue to record instances of such abuse.

Across the licencing regimes in Great Britain, Larsen traps are used as a measure to support a number of land management activities to varying degrees. For example, Larsen traps also frequently appear to be used as one means to enable the creation of large surplus populations of quarry species for game shooting. This activity can be expressed as 'conservation' of the quarry species concerned – and thus ostensibly legitimate under the law. However, the artificially high numbers of individuals produced are not necessary for effective conservation of those species, and the purpose of the activity appears to be the creation of shootable surpluses. This is not a legitimate purpose under either the Birds Directive or the domestic legislation that implements the directive. The true extent of this activity is hard to ascertain (this point applies to other activities under the general licences and not just to Larsen traps).

There is no system for formally recording the numbers of birds killed in Larsen traps, i.e. no requirement to provide returns on usage and therefore no means of understanding either the extent of trap use or the resulting impact on target species. Again, this inherent lack of monitoring is a wider issue with the general licences, and is not limited to Larsen traps.

The lack of monitoring by licensing authorities also means there is no record of the incidental by-catch of non-target fully protected species and of the fates of individual trapped birds of protected species.

On a more technical point, we note that other GB administrations have chosen to restrict the decoy species that may be used in Larsen traps to the territorial corvid species for which these traps are best suited, rather than allow the use of all the corvids to which the general licence applies, as the Welsh licences still do. Specifically in Scotland, only carrion crows, hooded

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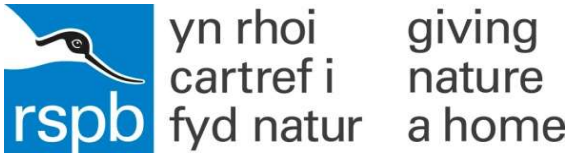


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crows and magpies may now be used as decoys in Larsen traps. Other ('social') crow species included within the general licences are not permitted. We consider that the general licences should seek to limit what they permit strictly to what is technically competent and absolutely necessary to achieve their purpose. Thus we advocate limiting permitted Larsen decoy species to carrion crow and magpie in Wales (noting that hooded crow does not usually occur in the wild in Wales).

Beyond the present topic of Larsen traps, we have broader concerns about the general licences. We are not convinced that the various species listed within the general licences always pose sufficient serious threat in each of the various circumstances in which they are permitted to be killed to justify permitting their unlimited killing in such thinly regulated circumstances.

Yours sincerely,

Annie Smith
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