

Minister for Environment and Rural Affairs
Welsh Government
5th Floor
Ty Hywel
Cardiff Bay
CF991NA

7th of September 2016

Dear Cabinet Secretary, Lesley Griffiths

We write collectively with regards to the current petition lodged at the National Assembly for Wales by the League Against Cruel Sports (LACS) calling for a ban on the use of snares in Wales. For reasons as outlined below, we call for the petition to be removed immediately from the Petitioning process of the National Assembly for Wales

The figures put forward within the petition by LACS are completely incorrect and disingenuous. The petition states that *"In Wales, some 370,000 animals are snared every year. That's more than 1,000 a day"*.

In suggesting that 370,000 mammals are caught in fox snares each year in Wales, the League Against Cruel Sports (LACS) are misrepresenting statistics from the 2012 DEFRA report Determining the Extent of Use and Humaneness of Snares in England and Wales. It appears that they have taken the capture rates from the single operator who carried out the humaneness testing work, and multiplied these by the estimated number of snares being used in Wales at any one time from the "extent of use" section of the report.

Multiplying numbers in this way is not scientifically valid. It fails, in particular, to take into account that the one operator was completely atypical, with a catch rate an order of magnitude higher than most snare users, and that it reflects data generated in one location with specific densities of target and non-target species that simply cannot be generalised across the whole of Wales.

As a consequence of these incorrect calculations LACS's petition suggests that every year snares are catching more than the total pre-breeding populations of foxes, badgers and hares in Wales (according to the seminal work on mammal populations in the UK, A Review of British Mammals: Population Estimates and Conservation Status of British Mammals other than Cetaceans, Harris et al., 1995*. Since the publication of this work a study has indicated that populations of hare and fox have declined from Harris et al.'s estimates). This is clearly an impossible situation, further highlighting the error in the statistics being used to promote this petition.

We are also very concerned that LACS are making quite untrue assertions about the humaneness of the snares themselves. Their suggestion that the new code compliant snares are "more likely to

cause injury or death” is also lacking in any scientific evidence and thus is completely disingenuous. The work for the DEFRA report that they ‘quote’ from showed that code compliant snares when properly operated meet the Agreement on International Humane Trapping Standards (AIHTS). Indeed there was no evidence of significant snare related injury to a single animal in the Home Office regulated humaneness testing work. This applied to the non-target animals which self-released (approximately half of the ‘captures’), those which were released by the operator, and the target animals which were despatched and subject to post-mortem examination by independent vets.

On the basis of the incorrect figures stated in the above mentioned petition we call for the petition to be removed immediately from the Petitioning process of the National Assembly for Wales. The League Against Cruel Sports would then have the opportunity to re-present a petition without these misleading claims.

Yours sincerely,



Rachel Evans
Director for Wales
Countryside Alliance



Mike Swann
Head of Education and Wales Advisor
Game & Wildlife Conservation Trust



Charles Nodder
Political Advisor
National Gamekeepers Organisation

* http://jncc.defra.gov.uk/pdf/pub03_areviewofbritishmammalsall.pdf

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