

Finlay Carson MSP

Convenor

Rural Affairs, Islands and Natural Environment Committee

By email: rural.committee@parliament.scot

30 June 2022



Dear Finlay,

Thank you for inviting OneKind to give evidence to the committee on 15 June, on the Hunting with Dogs (Scotland) Bill, and also for the opportunity to provide this further written information. We hope it will be helpful to give some more details on how the principles for ethical wildlife control could be applied to the Bill.

Applying the principles for ethical wildlife control to the Hunting with Dogs (Scotland) Bill



In both our written and oral evidence, we recommended applying the International Consensus Principles for Ethical Wildlife Control¹ to all wildlife management in Scotland, including the Hunting with Dogs (Scotland) Bill. Here, we provide more detail on how the principles could be applied to the Bill.

The principles could be written into the conditions applied to each exception, and into the licensing application requirements. (As previously stated, we would prefer to see no exceptions to the Bill and find the exceptions for the management of foxes and mink below ground, and for falconry, game shooting and deer stalking, particularly worrying.)

¹ [The Society for Conservation Biology \(wiley.com\)](https://www.wiley.com)

above ground”, objectives should relate to a reduction in crop damage or lamb losses, for example, and there should be “sound evidence that the proposed methods can achieve the objectives.” Currently, this does not always seem to be the case.

The results of any action taken should be monitored and adapted according to lessons learnt. So, if somebody has been killing foxes using dogs to flush to guns, without seeing any long-term reduction in the harm being caused, they would be required to try different approaches.

Principle 4 Prioritise animal welfare

Control methods should cause the least harm to the least number of animals. Anybody wishing to use dogs under one of the exceptions in the Bill would be required to demonstrate that no method with a lower animal welfare impact would be viable.

This requires a way to assess the relative welfare impacts of different methods. Such models exist³ and have recently been applied to rat control in the UK⁴, for example. We recommend that the Scottish Government explore the possibility for applying such assessment models to any wildlife management methods being used.

In the shorter term, the available evidence and advice from experts should be consulted to determine the relative animal welfare impacts of different methods.

As we said in oral evidence, if there are not enough ways to protect human interests that are both effective and humane, that is a problem that should be urgently addressed; it should not lead to continuation of the status quo.

The British Veterinary Association and British Veterinary Zoological Society recently wrote that: “It is paramount that additional research is carried out into the development of alternative methods for the exclusion and deterrence of wildlife, and more humane methods of killing.”⁵

Principle 5 Assess the social acceptability

The authors of the ethical principles suggest a process of community engagement informed by the relevant science to help inform decision making. They also write that: “An ethical review process with proper governance and resources, similar to that used by animal ethics committees when assessing the acceptability of scientific research involving animals and people, could be a way to include scientific and technical expertise while ensuring community values inform decisions.”

Following this suggestion for all wildlife management would improve transparency and communication and aid in the stated aim of the NatureScot Shared Approach to “help

³ [humaneness-pest-animals.pdf \(awe.gov.au\)](#)

⁴ [An assessment of animal welfare impacts in wild Norway rat \(Rattus...: Ingenta Connect](#)

⁵ [bva-and-bvzs-position-on-the-use-and-sale-of-snares.pdf](#)

encourage people to understand the decisions, sometimes difficult, that need to be made in wildlife management.”⁶

More immediately, for this Bill, embedding these principles would provide some reassurance and clarity around the decision-making process and should therefore increase social acceptability.

Principle 6 Long term systematic planning

“Decisions to control wildlife should be integrated into a program of long-term systematic management. If control actions are used on an ad hoc basis without being integrated into a systematic, long-term management program, any benefit is likely to be short lived and control actions may be used repeatedly without achieving a sustainable solution. This is particularly problematic if control actions carry substantial animal welfare or other costs. For example, low-level culling of abundant or prolific animals can amount to senseless killing if populations rebound quickly.”

This is the opening paragraph for the sixth principle, and unfortunately it seems that it could have been written specifically about predator control in Scotland.

Any licensing scheme for the use of more than two dogs must provide for such long-term planning, and guidance should be provided on how to do so for those using two dogs under the exceptions. This is likely to require information sharing and collaboration, to allow actions to be taken at a larger scale than individual landowners, which should be government led.

Principle 7 Avoid the use of labels

“Decisions to control wildlife should be based on the specifics of the situation, not negative labels applied to the target species.” The use of terms such as “pest” makes it likely that those animals receive less welfare consideration, and broader approaches are often taken.

This principle provides a check that decisions are based on thorough analysis of the concerns and outcomes. “Wildlife control should not be undertaken just because a negatively labeled species is present.”

We reiterate our recommendation to avoid the use of the word pest in discussions around this Bill.

We hope this information is helpful and are happy to discuss if further at any time.

Yours sincerely,

Kirsty Jenkins

Policy Officer, OneKind

⁶ [Wildlife Management: A Shared Approach - Concordat | NatureScot](#)