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The Hon David Llewellyn
Minister for Primary Industries and Water
Parliament House Hobart 7000
david.llewellyn@parliament.tas.gov.au

27 February 2008

Dear Hon Mr Llewellyn,

I have spoken with Simon Boughey and Mick Middleton. Thank you for giving the opportunity to have input into the process of finalizing amendments to the Animal Welfare Act to be introduced to the Tasmanian Parliament in March 2008, in particular any amendments that might restrict the use of rodent glueboards by professional pest managers. I became aware of the impending ban on glueboards only last week and spoke with six of the major pest managers in Tasmania, none were aware of the proposed legislation.

Whilst we understand the position taken by animal welfare groups in seeking to restrict the use of certain pest prevention products and methods, such as rodent glueboards (as set out in the Appendix to this letter), we believe it is vital that due consideration be given to the interests of public health, food safety and environmental quality, before any decisions are made that might jeopardize current effective professional rodent control methods and programs.

We recommend that the use of rodent glueboards be retained as an essential component of integrated rodent management programs aimed at effective management of rodent populations in urban, industrial and commercial environments. Glueboards are the preferred method to control mice in the Children's Hospital in Hobart, taking into account the need for control and safety to the children.

This submission is written from a professional pest management perspective. We recognize that glueboards have been available through supermarkets and similar outlets for many years and separate consideration should be made for their continued availability to the general public.

PROFESSIONAL PEST MANAGEMENT

Over the last decade, pest control has changed significantly from reliance on chemical control to a pest management approach that utilizes a range of products and techniques. Pest management technicians are now trained to inspect the premises, confirm the potential and reality of pest activity, find sources of infestation and choose the most appropriate management options.

All State Governments in Australia require pest management technicians to be licensed. The minimum requirement to obtain a license is competency in three units of

- | | |
|-------------------------------------------------------------------------------|-------------------------------------------------|
| PRM30204 – Certificate III in Asset Maintenance (Pest Management – Technical) | |
| Unit 5 | Modify environment to manage pests |
| Unit 6 | Apply pesticide to manage pests |
| and Unit 18 | Maintain an equipment and chemical storage area |

Integrated pest management (IPM) has become the basis of good pest control. This starts with the technician having the skills to select from a variety and mix of management options and perform the work to achieve the required result with least disruption to people, the structure and the environment. It is also important to have a range of management tools to draw on.

Inspecting a premise prior to any treatment has become critically important in integrated pest management. However, rodents are cryptic and nocturnal and their activity is hard to detect if there are only a few present. In some situations, including homes and food premises, there may be a zero threshold where even one rodent cannot be tolerated. A single rodent can contaminate food, spread disease or short out electricals causing fires and loss of property and production. Rodents breed very quickly, so a few can become many in a short period. Glue boards have become a reliable and widely used method for detecting the presence of rats and mice in low level infested premises.

PUBLIC HEALTH THREAT FROM RODENTS

The following quotes are from one of the world authorities on rodent management, Robert Corrigan; from his text book "Rodent Control: A Practical Guide for Pest Management Professionals", 2001¹

- "The relationship between people and rodents is relative to the situation. Rodents may be parasitic, commensal, neutral and even beneficial to humans depending on the situation."
- "It is safe to say that the total population of commensal rats and mice in the larger cities of the world is in the millions."
- "Historically, commensal rodents have been responsible for some of the most devastating disease outbreaks of all time. In the past century alone, more than 10 million people have died from rodent-borne diseases....Rats and mice have been implicated in about 55 different diseases, representing a diverse range of pathogens from viruses to parasitic worms."
- Repeatedly estimated losses of food to rodent activity is "between one fifth and one third of the world's food supply."
- "As gnawing and burrowing mammals, rodents inflict serious damage to our structures, equipment, furniture, utilities and transportation vehicles."

These show some reasons why it is important that we are able to maintain effective management of the commensal ('sharing the table') rodents. This refers to the introduced pest rodents – the roof rat (*Rattus rattus*), sewer or Norway rat (*Rattus norvegicus*) and mice (*Mus musculus*).

GLUEBOARDS

Glueboards are used to monitor and to reduce pest populations. Their specialization and use has increased over the last decade. They have become an important part of pest management in many areas of use, in part because they can be used in areas where no other control products are suitable and because they are seen to be 'green' because they do not contain 'toxic' chemicals.

Glueboards have become an integral in monitoring pests in commercial food production premises. They are usually checked on a monthly basis as part of the pest inspection process. Both the pest manager and production management hope never to find signs of activity on the

¹ Corrigan, R 2001

boards because it indicates the pest has penetrated other measures in place and that further work is required to find the source of infestation, eliminate the current activity and reduce the chance of future infestation.

Which is more important – knowing that the premise has a pest problem that could result in spreading disease to people that eat product from that facility or concerns over trapping and leaving a rodent to die on a glueboard? Few rodents should be caught in this way because it is aimed at monitoring for the presence of rodents in a premises that is protected by other means (eg perimeter baiting) and thought to be relatively free of infestation.

Glueboards can also contribute to effective control of rodent infestations. Data put forward by the New Zealand National Animal Welfare Advisory Committee cites trials comparing the efficacy of snap traps and curiosity traps versus glue boards. The former both caught more than the glueboards. However, some rodents will avoid various types of traps so it is important to have a variety available. The NACAW data shows that if glueboards are used as part of an overall program then control will be enhanced, with fewer rodents dying on glueboards than on the other traps. During a control program, traps are inspected more often, often daily, compared to a monitoring program. This facilitates removal of trapped rodents and, if necessary, the replacement or re-siting of all control methods to ensure maximum effectiveness.

The requirement for safe food has led to each food manufacturer being responsible for a written plan and resulted in the development of Hazard Analysis Critical Control Points (HACCP). Auditors of food manufacturers, including export meatworks audited by AQIS, require multiple levels of controls and often restrict the use of rodenticides from sensitive areas where there is potential for contamination. Standard operating procedures of AQIS² requirements for export meat establishments state –Target 6.6 toxic baits are not permitted in edible production areas, and 6.9 requires indicator stations in storage and associated production area (this includes sticky boards) to be checked daily prior to commencement of operations. Glue boards have become important in these situations because they can be placed in areas where rodents may travel, particularly in situations where other traps may be too bulky. Glueboards can act as monitors as well as capture devices for rodents that penetrate the other defenses.

Glueboards can be important as part of a control program when

- there are large numbers of rodents that need to be reduced quickly – in these cases all available methods would be used
- there are one or a few rodents that are proving difficult to control
- in sensitive areas (eg food production)
- where other methods are not suitable (eg because of bulkiness of other traps – a glueboard can be hidden under a fridge etc whereas a snap trap might not be able to be used because of space requirements or danger to non-targets).

In summary, glueboards are important as monitoring tools (when there is low expectation of a rodent being caught) and as control products.

² AQIS 2006

RECOMMENDATION

Although several States and New Zealand have explored the banning of glueboards for rodent management, none have yet taken that step. We recommend that the proposed amendments to the Animal Welfare Act include a Ministerial exemption to allow the use of rodent glueboards by the professional pest management industry. The pest management industry will be developing guidelines, in association with State Animal Welfare Units for use of rodent glueboards throughout Australia. The industry is hoping for consistency throughout Australia.

While waiting for the Guidelines to be agreed and to ensure the continued responsible use of rodent glueboards by professional pest managers the Department may consider sending a letter to pest managers through the state licensing authority (DPIW) detailing the Department's concerns and providing recommended guidelines to reduce the incidence, pain and distress of rodent deaths by glueboard including:

- The pest management technician must be competent in rodent management
- Glueboards may be used to monitor for rodent activity
- If activity is found, the glueboards must be inspected daily.
- Glueboards should be used as part of an overall program , not as the sole management tool unless other methods are considered and deemed not suitable in that instance
- Any rodents found alive on glueboards must be killed humanely
- All efforts must be taken to protect against non-target species contacting the glueboards (NOTE: vegetable oil will remove the glue if there is an accidental trapping.)

We would welcome the opportunity to assist you in drafting a letter if that becomes your preferred option.

I have included examples from pest management companies to show how glueboards are used and their importance as a rodent management tool. They are used in a variety of situations from food processing to sterilized areas to organic food establishments to hospitals and homes, offices and warehouses.

If you require further information, please do not hesitate to contact me.

Yours sincerely,

Phil Sayer BScAgr
Technical and Training Manager
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041 99 11 700

ABOUT GARRARDS P/L AND THE AUTHOR

Garrards P/L have been a specialist supplier to the pest management industry for over 20 years. Garrards are the largest supplier to the pest management industry in Australasia with offices in:- Townsville, Brisbane, Gold Coast, Newcastle, Sydney, Melbourne, Adelaide, Perth, Darwin, Auckland and Christchurch.

Phil Sayer specialized in biological control of insects during under-graduate and post-graduate studies and tutored in Entomology at Queensland University before specializing in Urban Pest Management. For the last 30 years he has worked as a pest manager, a technical representative for a multi-national chemical company and Technical and Training Manager at Garrards for the last five years. Phil has consulted with many in the industry in compiling this submission.

APPENDUM

GLUEBOARDS FOR RODENT MANAGEMENT IN AUSTRALASIA

THE STORY SO FAR.....

NEW ZEALAND

National Animal Welfare Advisory Committee

AUSTRALIA

RSPCA

National Consultative Committee on Animal Welfare
Victorian DPI Bureau of Animal Welfare

LITERATURE

Mason & Littin (2003)

The Humaneness of Rodent Pest Control

NEW ZEALAND

NAWAC

(National Animal Welfare Advisory Committee)

Forwarded to MAF (Ministry of Agriculture and Forestry) a proposal which was prepared for discussion as **MAF Discussion Paper No: 29: ‘Proposed Prohibition of the Use of Rodent Glueboard Traps’ December 2002.**³ It states: “This paper has been prepared for consultation and discussion only, and does not represent the policy of the Government or MAF.”

CONTENT – The paper checked the use of glueboards against section 33 of the Animal Welfare Act 1999. In 2000, NAWAC recommended to the minister the prohibition of “commercial importation, sale or use (of glueboards)”. However, “glueboards were approved by MAF Quality Management in the past” so “it is timely to consider the wider implications of the use of glueboards, including the animal welfare concerns their use raises.”

The ‘Nature and Purpose’ section states – glueboards “are often favoured in areas where alternative methods may be unsuitable.” In ‘Levels of Pain or Distress’ it concludes “when animals are left on glueboards for extended periods, the animals suffer a level of pain or distress that is unacceptable. Frequent checking of glueboards and humane disposal of trapped animals could produce a higher level of acceptability.”

A discussion of availability and cost-effectiveness of alternatives:

- curiosity traps – appears to be little pain although some distress is likely to occur as a result of the animal being physically contained. There is potential for the levels of pain or distress to vary significantly depending on how frequently traps are checked.
Two studies cited
 - 1) 19 curiosity traps (caught 96 mice) and 28 glueboards (46) over 6 nights.
 - 2) 48 curiosity traps (47) and 48 glueboards (7) in a single night.that drew the conclusion “curiosity traps are more effective than glueboards” and “at the very least curiosity traps provide an effective alternative to glue boards in terms of catch rates”.
- electrocution – is likely to be a swift death. There are concerns, however, about the level of pain and distress occurring within this period. A study on the current product concluded that the device did not meet NAWAC guidelines for traps as it failed to kill all sample animals.
- poisons – widely available and widely used but no comparisons made.
- snap traps – more acceptable than curiosity traps and glueboards because do not require animal to be captured and held prior to humane disposal.
Study cited
96 snap traps (caught 56 mice) and 48 glueboards (4) in a single night

The ‘Feasibility of Transition’ quotes a submission: “...the main users of glueboards are in the commercial food production sector. Such users are often averse to using pesticides in their plants

³ MAF 2002

due to the risk of contamination. This concern may be further compounded by applicable standards to which such premises must adhere. Food production premises in the dairy industry, for example, are required to develop a Hazard Analysis and Critical Control Point (HACCP) program to identify the potential for contaminants to enter their production systems. HACCP programs must not only identify potential contamination risks, but also implement procedures for addressing the risks of contamination associated with the most vulnerable points in the production process. Such risks and obligations often lead to the favouring of non-toxic methods of pest control.”

Glueboards may also be favoured because the animal will die in the trap rather than crawl away to die unseen....a reason why a pest control operator in a residential environment may use glueboards.

Summary of Options

- 1) No Action
- 2) Restriction
 - A Maximum time between inspections with humane disposal that renders them immediately unconscious
 - B A + use only in commercial food production premises
 - C A + use only in residential premises
 - D A + use only in commercial food production premises or by commercial pest operators in residential premises
- 3) Prohibition

COMMENT: The greater the choice of tools to manage rodents the better the chance of success, the ‘alternatives’ listed are other methods of rodent management – not direct replacements. All of these tools require competency in use to achieve their maximum benefits.

- curiosity traps are bulky (eg can’t slide one under a fridge) and poor against rats
- the electrocutor trial cited killed only 40% of rats entering the station.
- poisons are not able to be used in some areas for fear of contamination, take 4+ days to kill and the rodent may die in an inaccessible area.
- snap traps are bulky and not all rodents will approach them

The studies cited show the importance of using a variety of management tools – the glueboards caught mice that did not go to the alternative trap. In many areas of treatment there is a NIL threshold level – even one rodent in some situations can cause horrific damage – eg a mouse was blamed for the fire at Rove Enterprises production studios in Melbourne in October 2004.

There is no comment in this document on the importance of rodent management in maintaining high standards of public health.

NAWAC ANNUAL REPORT 2006

“NAWAC’s recommendations for the prohibition of rodent glueboard traps and a number of specified leghold traps are now progressing, with the substance of the original recommendations likely to be addressed by Orders in Council during 2007.”

COMMENT – In February 2008 a MAF representative stated MAF will be asking for public feedback on a proposal for glueboard traps this year.

AUSTRALIA

RSPCA AUSTRALIA

"A national approach towards humane vertebrate pest control"

Discussion paper arising from the proceedings of an RSPCA/AWC/VPC joint workshop,
August 4-5, 2003, Melbourne

Section 3.2.2 Ranking the humaneness of control techniques

"Ranking humaneness against efficacy"

It was generally agreed that the selection of the most appropriate vertebrate pest control technique required consideration of both humaneness and efficacy: decision-making concerning the continued use or specific need for using particular techniques could not be based upon humaneness alone. In the absence of a humane alternative, especially in the face of a valid need to address high priority needs, a technique that is considered to have poor humaneness may be justifiable if it has high efficacy. Conversely, some techniques that are considered humane may have low efficacy and cannot therefore be justified in any circumstances where desired objectives cannot be met. The task of ranking technique humaneness against efficacy was considered to be a high priority and one that was required before further RDE and policy needs could be identified."

COMMENT – Hugh Worth (President RSPCA) proposed, Glenys Oogjes prepared and seconded NCCAW Position Statement 37 and Jane Malcolm (who prepared the Victorian RIS and failed to include this statement in the RIS) were listed as being present at this meeting. All failed to ‘face the valid need’ of the “high priority” of public health in their later actions. Glueboards have unique characteristics in many of their uses, other methods are not direct alternatives but simply other methods of management.

NCCAW

(National Consultative Committee on Animal Welfare)

October 2004 – Position Statement 37 – NCCAW believes that Glue Boards and Gels and Metal-toothed Traps cause unnecessary suffering to trapped rodents and their import, manufacture and use in Australia should be prohibited.

HISTORY – The ‘Non Production Animal Working Group’ presented two papers to the committee in October 2003. They were tabled by Glenys Oogjes (Animals Australia) and entitled: ‘Criteria to Assess Devices, Practices and Procedures’ and ‘Glueboards’. Ms Oogjes was actioned to develop a draft NCCAW Position Statement.

The next meeting – April 2004 – discussed the draft Position Statement. After some minor editing, it was recommended and carried that NCCAW endorse the amended draft Position Statement.

The Position Statement was adopted at the 34th Meeting of NCCAW in October 2004.

COMMENT – It appears from the published minutes of this committee that the importance of rodent management and the benefits of the use of glueboards in maintaining public health standards were not considered.

VICTORIA

Draft Prevention of Cruelty to Animals (Prohibition of Glue Trapping) Regulations 2005

Regulatory Impact Statement

CONTENT

“There is no question of the need to control pest rodent populations. Pest rodents destroy many millions of dollars worth of crops and stored foods in Australia each year, and contribute to the spread of diseases and damage to property. The issue relevant to this RIS is the control of pest rodent populations without cruelty to rodents or other animals.”

The effect of glueboards on mice were mainly taken from a paper by Frantz and Padula and a review by Mason and Littin.

RSPCA Victoria comment – “Receives around 6 complaints of animal cruelty per year in relation to the use of glue traps.” In one instance a kitten was caught. “In some cases animals have suffered severe injuries, such as severed and broken limbs from trying to free themselves.” Animals Australia – which represents more than 40 member groups – “has received around a dozen telephone calls over the last few years from members of the public expressing concern about the use of these traps.”

COMMENT – This document states its bias to achieving a result – “The issue relevant to this RIS is the control of pest rodent populations without cruelty to rodents or other animals.” – this is evident from inception to conclusion.

- The RIS claimed a KPMG National Competition Policy Review gave authority for the RIS, however the KPMG Review omitted pest rodents in its scope – including only “domestic and farm animals as well as wildlife, animals used for recreational purposes and animals used for scientific purposes in research and educational establishments.”
- The conclusion achieved the desired outcome by weighting
 - Reduction in animal pain and suffering 70%
 - Effectiveness of rodent control 10%
 - Costs of compliance and administration 10%
 - Equitable distribution of costs and benefits 10%The importance of maintaining high standards of public health was erroneously disregarded in the outcome weightings and prohibition of glueboards was incorrectly scored as having zero impact on the effectiveness of rodent management..

The RIS cited a paper by Frantz & Padula that tested the efficacy of glueboards and described the inhumaneness of death in some cases. Some of the relevance of this paper is lost because there have been major changes in glues and glueboards since this trial was undertaken 25 years ago, although there is no doubt that being restrained against one’s will on glue would be highly distressing and may result in some of the injuries described. The review by Mason and Littin detailed in the RIS is discussed in more detail in the next section.

The comments from the RSPCA and Animals Australia confirm that there are very few non-target animals caught on the boards – only one kitten is mentioned by either group. Also there does not appear to be a major concern by the public with the extremely low level of complaint.

LITERATURE

Mason & Littin (2003) The Humaneness of Rodent Pest Control

(NOTE: Dr Kate Littin is the Technical Advisor for New Zealand MAF Animal Welfare Group.)

“Here, the humaneness of the methods used in the UK and the USA is assessed in terms of their speed and mode of action, the appearance and behaviour of affected animals, experiences of human victims, long-term effects on animal that survive exposure, and welfare risks to non-target animals.”

Several methods are described as ‘humane’:

- cyanide
- alpha-chlorolose
- electrocution traps
- well-designed snap traps
- preventative methods – eg proofing

Those described as inhumane are:

- anticoagulant poisons
- zinc phosphide
- calciferol
- sticky boards

Sticky boards – “In the UK, where boards are used by professional pest controllers only they must be checked at least daily and live animals ‘humanely killed’. However in countries where these traps can be bought by the general public, rodents may be killed in a variety of unregulated ways, or even left on the boards to die.”

“The humaneness of sticky boards depends on the length of time for which the animal is trapped and on the manner of death. During this time, rodents are likely to experience pain and distress through being trapped, the physical efforts of the adhesive on functioning and trauma resulting from panic and attempts to escape, such as forceful hair removal, torn skin and broken limbs.”

COMMENT

Mouse activity is very different between Australia and the UK. As Mason & Littin quote from Corrigan “Australian farmers may kill as many as 70,000 mice in a single afternoon during mouse plagues”. In Australia, rats and mice move readily between structures and across roads.

A study of the ‘Population Biology of the Urban Mouse in the UK’ by Murphy et al reported at ICUP 2005 in Singapore states “Mice were easily moving between adjoining properties (such as semi-detached houses or terraces - defined as housing blocks) but that between the housing blocks there was very little movement.”

Understanding this difference in behaviour is very important when considering inspection and management options – processes used in the UK may have little relevance in Australia.

The methods described as ‘humane’ are not all available to pest managers in Australia nor would they be considered a complete solution for effective rodent control.

Cyanide and alpha-chlorolose are not registered for rodent management in Australia. Cyanide is too dangerous for widespread use to the technician and its various forms are listed as “potential security concerns” in the Australian COAG⁴ report released in February 2008. The M&L review recognizes the danger of cyanide “If cyanide is too dangerous for a site, extensive snap-trapping should be used.” Restrictions on alpha-chlorolose already exist for its use in bird management, and there is no specific antidote, so it is unlikely to ever gain registration for rodent management. Also the temperature must fall below 16⁰C for alpha-chlorolose to be effective. The recommendation in the review is that control could be “aided by turning off hot water systems etc overnight, to prevent any pockets of warmth that could save some animals” – it is totally impractical to recommend water heaters (heat at night) and central heating be turned off.

Mason & Littin stated in the body of the paper re electrocutors: “Mice may also sometimes move too fast to make good contact between the plates, and tests on rats in New Zealand found that three out of five rats fell over when shocked, broke the contact, and so failed to be killed.” Although the electrocutor probably fails two tests for humaneness – must kill all and inflicts intense pain – it is included as humane. The ‘Zapper’ has been available to the pest management industry for many years – they are not bought because of the known poor efficacy.

Snap traps are used widely in the industry, but it has been shown that not all rodents are lured to snap traps and that they should be used as part of an overall program. Also they cannot be placed in some areas because of their bulk.

Proofing has always been an integral part of rodent management, however it can be extremely difficult to implement due to their ability to squeeze through small openings – a mouse can access a gap the size of the end of your little finger and a rat can access a gap the size of the end of your thumb. Few structures are purpose built proofed against rodents. Unfortunately builders do not ask advice from pest managers prior to erecting or renovating structures and most commonly the industry has to protect the structure as it is with only few modifications possible.

Mason & Littin stated their topic up front “the humaneness of the methods used is assessed”. They did not claim to assess need, effectiveness and practicality against humaneness. In a section ‘Rodent control: a welfare anomaly’ they pose the questions “Does the practical need for control fully justify the suffering currently caused? Are the practical problems with some humane methods really insoluble?” The second question shows that the authors correctly recognize the lack of effective humane methods to manage rodents with what is available today.

Mason & Littin state: “The concerned individual can make some contribution to humane rodent control by trying a variety of approaches before resorting to sticky boards or the inhumane rodenticides.” Unfortunately the authors do not understand that when pest managers are called to control rodents (control as opposed to ongoing inspection and management) there is an existing problem that must be eradicated as soon as possible. A common sense compromise would be that ‘sticky boards’ should not be used as a stand alone strategy but as part of an integrated pest management program – by using a variety of approaches simultaneously rather than one after the other – as described earlier in this document.

⁴ CBRN Security Branch 2008

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1) Summary of Proceedings	32 nd Meeting	15-16 October 2003
	33 rd Meeting	6-7 April 2004
	34 th Meeting	13-14 October 2004

2) NCCAW Position Statements No 37 (2004) from www.affa.gov.au

RSPCA 2003 *A national approach towards humane vertebrate pest control. Discussion Paper*. Arising from the proceedings of an RSPCA Australia/AWC/VPC joint workshop, Melbourne

EXAMPLES OF PEST MANAGEMENT COMPANIES' USE OF GLUEBOARDS

1) ISS Flick, Hobart, Tasmania



21st February 2008

To the Minister,

I am writing in concern to the issue of glue boards being banned in Tasmania.

We wish to apply for an exemption for the pest control industry. In Tasmania we service the majority of food production sites throughout the state and frequently use glue boards in controlled situations to help control mice and rats.

There are many food processing and storage sites that if this act were to be implemented would be considerably affected financially due to stock being damaged from direct contamination from these pests. The glue boards are often used for monitoring purposes in suspected mice infestations and do help to highlight infestations at any early stage.

I am concerned being involved with the food industry that should this valuable tool be taken away from Pest controllers there will be a higher risk of rodent contamination to food items.

Food items contaminated from Rodents do carry Salmonella and will pose a risk to the public. I was personally involved with the peanut butter scare at Kraft Foods in Port Melbourne many years ago where a large number of people were affected and hospitalized from Salmonella contamination. This was caused from a mouse and glue boards were involved in the monitoring and identification process of this out break.

Being involved in all aspects of pest control in food manufacturing processes we highly recommend their use in a controlled situation.

If you wish to discuss this in further detail I am available at any stage.

Kind Regards

Tim Manns
Tasmanian Manager

2) Pink Pest Services, Sydney, NSW



While we don't employ glue boards for rodent control on any large scale, there certainly are situations where we really have no practical alternative.

We have had rodent populations to manage in premises where the use of baits was not possible and where the rats were "trap shy" due to the previous use of snap traps.

One of these was a manufacturer of heart pacemaker components and there were numerous "sterile" areas - understandably, they were very strict about having no poisons applied in their premises.

The second was manufacturer of organic, herbal health products. They were required to ensure that nothing was applied that might even suggest that a poison or even non organic grain was allowed inside their premises.

In both of these situations, we were left with only snap trapping or glue board trapping. The other issue in both cases was our need to ensure that any rat that was killed, was able to be retrieved from the premises which is, of course, only possible with trapping.

We have found repeatedly that rats and also mice have often become very "shy" of snap traps where they have been used with any prior frequency. While some shyness can result from the use of glue board traps, these can then be alternated with snap traps.

If the option of glue boards is removed, it will become much more difficult to find a workable alternative where poison baits are not viable and rodent shyness of snap traps is present.

These are my brief thoughts, for what they're worth.

Regards,
Mal Trotter
Managing Director
www.pink.com.au

3) Anteater Pest Control, Sydney, NSW



In response to your email regarding the above subject. We are against the banning of Glueboards.

They are an important tool and the only tool for monitoring pest populations in **sensitive areas** such as Food Manufacturing/Preparation, especially "Organic Food" preparation areas (Must be pesticide free area as required by HACCP), Operating Theatre environments which are a sterile environment and other sensitive areas where pesticides cannot be used.

Glueboards are required for **monitoring** pest populations in sensitive areas and are the control solution for these environments. Depending on the pest population findings on the Glueboards helps determine the Pest Management Treatment requirements to be carried out to perimeter areas outside the Sensitive areas.

Glueboards are an important tool for IPM - Integrated Pest Management.

Regards,
Graham Williamson
Director
www.anteaterpest.com

4) Mark Richards Pest Control, Gordonvale, Nth Qld

I would like to add my support for the retention of glue boards.
Here in North Queensland we have a significant and ongoing problem with rodents and the diseases they carry such as Weal's Disease (leptospirosis). Large rodent populations build up each year that tend to be displaced when the sugar cane crop is harvested. Glue boards are one technique for rodent control when the use of other methods such as poison baits are not appropriate such as in a child care centre.

Yours faithfully
Mark Richards
Mark Richards Pest Control

5) Adams Pest Control, Adelaide, SA



Re: Glue traps for rodent control

Glue traps are an important and necessary tool to be able to control mice within the pest control industry.

There are many situations where the use of toxic bait stations is prohibited or unsafe.

There are situations where mice are bait shy or simply not taking it due to other food sources.

Mice are vectors of disease and furthermore contamination of foodstuffs can jeopardise exports. Every tool possible should be available to control these pests.

It should be noted that live capture traps could be regarded as cruel as captured mice rapidly die from hypothermia or stress.

Regards
Mark Shuttleworth
Commercial Service Manager
Adams Pest Control - Adelaide

6) Budget Pest Control, Townsville, QLD

After hearing of the proposed restrictions on glue boards it is some cause for concern.

We treat with a major retail food chain where during the months of May and June 2005 rodent activity was alarmingly high. We found a baiting program was not 100% effective, they continued to forage through the company's food products. Also the bait took some time to act. Rodent snap traps and other physical systems became ineffective after the first week.

We then placed a series of glue boards around the warehouse. Over a period of ten days we took out over 60 rodents. The boards were placed at night and in the morning picked up and removed. At night when no-one was present activity was high. The glue boards were then used in two other branches with the same results. Over two years later, we are on top of the infestation and rodent bait stations placed around the warehouses provide effective control.

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Regards
Phil Geertz
Budget Pest Control

7) Steve Fenton Pest Control, Hobart, Tasmania

I don't use glue boards often and I don't think many of the other Pest Controllers do either but in some situations they are a very handy tool to have in your kit. There are times when a lone Rat or Mouse is causing grief and has to be caught as soon as possible i.e food premises (producing or selling) where baiting cannot be used or Medical premises where contamination control is of paramount importance and immediate capture is of utmost importance. The banning of Glue boards will make these situations almost impossible to fix. Trapping is not always a viable option either.

I'm sure the people wanting to ban these products realize the amount of physical and personal damage that rodents can cause. You would hope so!

Cheers

Steve Fenton
Steve Fenton Pest Control
80 Sunshine Road
Austins Ferry
Tasmania 7011

Manufacturer

Greens General Foods, Glendenning, NSW

Green's General Foods at 29 Glendenning Road, Glendenning NSW 2761, is medium sized food manufacturing company.

We use external bait stations (with wax bait blocks) along the perimeter fencing as our first line of defence against rodents/mice. We then have a second set of similar bait stations along the perimeter wall of our buildings; this is our second line of defence. For the reasons yourself the RIS rightly point out, we do not wish to use poison bait inside our buildings and thus use glue boards for this purpose. We also seal off any possible rodent entry points into our buildings whenever they are discovered. Regular site audits (3-monthly) are done and points addressed.

As you can see, we use glue boards only as a last line of defence, and it will indeed be tragic if we have to stop using these. They are checked/serviced minimum once every 2-weeks.

We support you in your submission to the Bureau of Animal Welfare, and wish you luck; no, I should say we should wish us all good luck!

Best Regards.
Magdon Ismail
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