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Dear Sir/Madam

## Consultation on Wildlife and Natural Environment Bill: Clause 10

The Northern Ireland Badger Group, one of the member groups of Badger Trust, has drawn the Trust's attention to the consultation on the draft Wildlife and Natural Environment Bill. Badger Trust is a UK wide organisation whose mandate is to promote and enhance the welfare, conservation and protection of badgers, their setts and habitats, for the public benefit. We fully support the response made by the Northern Ireland Badger Group.

Generally we welcome and support the aims of the Bill to enhance the protection of all forms of wildlife. But we very much regret that Clause 10 proposes the continuation of snaring. The experience of our member groups over many years is that snaring is inherently cruel, indiscriminate (non-target protected species are frequently maimed or killed) and invariably lacks any kind of credible monitoring. In particular we would ask you to note that badgers, large, powerful (protected) animals, are often deliberately snared and frequently suffer indescribable mutilation.

Our conclusions: Clause 10 of the Bill, whilst containing some additional provisions, does not go far enough because it still allows snares to be used. **Badger Trust urges the NI Assembly Government to ban completely the use of snares with appropriate penalties for committing the offence.**

We also urge the NI Assembly Government to ensure that the enforcement authorities have sufficient personnel and other resources to investigate wildlife crime and bring the perpetrators to court with appropriate penalties. In this context we would like to refer specifically to paragraph 2A which reads: "*Any person who sets a snare in position or who knowingly causes or permits a snare to be so set must, while it remains in position, inspect it or cause it to be inspected at least once every day at intervals of no more than 24 hours*".

We accept that this condition is well intentioned but from experience, and to emphasise our earlier point, we would argue strongly that in the absence of a sufficiently well resourced/ monitoring/policing inspectorate it is virtually unenforceable and will have little or no practical impact.

**We ask that (should you decide to allow snaring to continue) you consider imposing a minimum requirement that when challenged anyone who legally sets snares must be able to satisfy the appropriate authority that the resources to inspect those snares every 24 hours are available and regularly in use.**

Yours faithfully

*Owen Hydes*

**Owen Hydes**  
Chief Executive