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# **Cage-trapping and dispatch of badgers under licence to prevent the spread of bovine TB in cattle**

## **Best practice guide**

**August 2014**





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## Introduction

This Guide has been produced to provide clear direction to those licensed to carry out cage-trapping and dispatch of badgers under licence to prevent the spread of bovine TB in cattle. It provides recommendations on best practice and highlights those areas of the technique that must be complied with, including licence conditions.

This Guide does NOT confer any authority to undertake the actions described. These actions may only be undertaken where a specific licence under the Protection of Badgers Act 1992 authorising the killing of badgers has been issued AND in accordance with Class Licences WML-CL04 and WML-CL05 (as appropriate). Those acting under licence must ensure that all conditions are complied with and must take all reasonable steps to ensure that the licensed operations are carried out safely and humanely.

## Legal protection for badgers

Badgers and their setts are protected under the Protection of Badgers Act 1992 (the '92 Act), which makes it an offence to kill or take a badger, except under licence. In addition certain methods of killing or taking badgers, including the use of cage traps and artificial light are prohibited under the Wildlife and Countryside Act 1981 (the '81 Act).

As well as a licence under the '92 Act, cage-trapping must be carried out in compliance with the conditions of the relevant 'prohibited methods' Class Licence (WML-CL04) issued by Natural England under the '81 Act. A person guilty of an offence under the '92 Act or the '81 Act may be liable on summary conviction to imprisonment for a term not exceeding six months, or a fine, or both.

The '92 Act prohibits interference with a badger sett which includes damaging, destroying and obstructing access to a sett, causing a dog to enter a sett and disturbing a badger when it is occupying a sett. A licence to take or kill badgers, unless otherwise specified in the licence, does not permit interference with a badger sett. The Act defines a badger sett as "any structure or place which displays signs indicating current use by a badger".

It should not be assumed that, because control has been carried out at or near a sett, the sett is no longer occupied and can therefore be closed down.

## Humaneness standards

Live-capture cage-trapping and dispatch is widely considered to be a humane method for wildlife control. To ensure that a high level of humaneness is maintained in badger control, licensed operators must meet the required level of competence, follow these best practice guidelines and strictly comply with all licence conditions. **Operators must never feel**

**rushed into taking a shot.** The key consideration is for a safe, accurate, and humane shot.

## Training

Those trapping and shooting badgers under licence (as opposed to assisting eg by pre-baiting) must be competent in the use and safe handling of firearms and in the operation and use of cage traps. Persons **will be required to demonstrate an appropriate skill level, through necessary training, including Defra’s approved training on the humane shooting of badgers.** Consideration should also be given to appropriate refresher training to maintain competence.

## Licensed persons

A licence to kill or take a badger for the purpose of preventing the spread of bTB permits only the person(s) named on the Additional Authorised Persons (AAP) list to carry out the authorised actions; the work cannot be delegated to a third party.

Persons assisting but not participating in killing/taking activities, such as pre-baiting, do not need to be named on the AAP. However, if an individual is not trapping or shooting, yet is still performing an action prohibited by the ‘81 Act, such as operating a lamp or torch to enable someone else to take/dispatch a trapped badger, they must act within the terms of the Wildlife and Countryside Act ‘prohibited methods’ Class Licence (WML-CL04).

Persons setting traps to catch badgers are considered to be engaged in the actual process of taking the badgers and must be covered by both licences. When applying for licences, consideration needs to be given to which person(s) will be carrying out each activity.

Only a person licensed under the Protection of Badgers Act may directly handle or shoot any live trapped badgers. Once the badger is dead, no licence is needed to handle it and assistants may help by, for example, placing the badger into a bag and disposing of it as described below.

The guide		
	What you must do	Important advice
<b>1. Firearms and ammunition</b>	Cage trapped badgers can only be dispatched with a 12-bore shotgun using appropriate frangible (‘reduced hazard’) ammunition (see <b>Frangible Ammunition</b>	The use of an automatic or semi-automatic weapon (ie one with a magazine capable of holding more than two rounds) is prohibited under the ‘81 Act and there will be a presumption

	below).	against licensing these for culling badgers. However, it will be permissible to use a semi-automatic shotgun that is restricted to holding one cartridge in the chamber and two in the magazine (for which a certificate is required under section 2 of the Firearms Act 1968).
<b>2. Frangible ammunition</b>		<p>Frangible ammunition is designed to disintegrate on impact. Defra has developed a frangible 12 bore low-powered cartridge designed to minimise the risks of ricochet and splash-back, whilst ensuring a humane kill at close range. Use of such a cartridge in a long-barrelled weapon, such as a shotgun, further reduces the hazard of splash-back.</p> <p>Suitable frangible ammunition is not available 'off-the-shelf', so licence coordinators will need to arrange access to an authorised supplier.</p>
<b>3. Shotgun Certificates</b>	A person using a shotgun to shoot cage-trapped badgers under licence must be in possession of a current Shotgun Certificate and have authority to shoot on the land where the cage-trapping and shooting is proposed.	Any queries on firearms should be directed to the local Police Firearms Enquiry Officer in the first instance.
<b>4. Seasons</b>	The time of year when trapping may be permitted will be restricted and <b>no trapping of badgers in the field for culling will be permitted between 1<sup>st</sup> December to 31<sup>st</sup> May, inclusive</b> . This is to reduce the risks of trapped badgers suffering exposure due to severe weather or of leaving dependent cubs underground to suffer starvation as a result of nursing females being culled.	<p>The actual period when cage trapping and dispatch is permitted will be specified annually under the terms of the individual licence.</p> <p>Trapping should be suspended in bad weather if there is a risk that trapped badgers could suffer from extreme exposure – taking account of low temperature, wind-chill and heavy rain in combination (see also trap</p>

	<p>During periods when culling is permitted, where an operator has reason to suspect that a trapped animal may be a lactating sow with dependent cubs, the animal must not be shot and must be released as soon as practicable.</p>	<p>placement below).</p>
<p><b>5. Equipment:</b></p>	<p><b>Cage Traps</b></p> <p>Cage-traps should have dimensions of at least 1 metre (40 inches) long, not less than 350 mm (14 inches) wide and 350 mm high and should be constructed from 50 mm (2 inch) square 8 gauge mesh.</p> <p>There must be no sharp edges.</p> <p><b>Triggering mechanism</b></p> <p>Cage-traps should be triggered by means of a string trip-line (2 or 3-ply garden twine), which an animal pushes against to reach the bait at the back of the trap. This releases the trap door, which is then held in place by a brace mechanism or gravity, depending on design.</p> <p>Jute or hemp garden twine must be used as it breaks easily if a badger becomes entangled in it; thus avoiding risk of injury.</p> <p>Polypropylene garden twine, baler twine, parachute cord or electric fence wire must not be used.</p>	<p>If a double-barrelled shotgun is to be used for dispatch, the trap (and/or shotgun) may require modification to enable the muzzle of the weapon to pass through the mesh eg removal of foresight bead from top rib of barrels.</p> <p>A single-barrelled shotgun should not require modification of the traps as the barrel will pass through any square of the mesh. For this reason single-barrelled shotguns may be preferred.</p> <p>Additional equipment:</p> <ul style="list-style-type: none"> <li>• wire (minimum diameter 1mm) or cable-ties for fixing trap doors open</li> <li>▪ 2 or 3-ply jute or hemp garden twine for re-setting traps</li> <li>▪ spade for bedding in traps (see below)</li> <li>▪ 40mm PVC pipe for depositing peanuts inside the trap – alternatively a spade may be used for this purpose</li> <li>▪ restraining wicket(s) (see below)</li> <li>▪ carrying handles for traps</li> <li>▪ pliers or multi-tool for fixing doors open with wire</li> </ul>

		<ul style="list-style-type: none"> <li>▪ container for carrying peanuts</li> <li>▪ blunt instrument for corneal reflex test.</li> <li>• Before use, each trap must be checked to ensure it is in good working condition; replace or repair any faulty or damaged parts as required (eg trigger arm or hinge plate) and check for any sharp points or faults that might injure a trapped badger. Traps should also be 'weathered' to remove any scent that might deter badgers from entering them.</li> </ul>
<p><b>6. Trap placement:</b></p>	<p><b>Traps must only be placed on land where permission has been granted.</b> If remote trapping is being considered, eg because of setts on neighbouring land where there is no permission, due regard must be given to the wishes of landowners/occupiers who do not want to allow culling.</p> <p>Traps must not be positioned directly on spoil heaps or block access to, or be dug into, sett entrances or tunnels.</p> <p>Traps placed on a slope must be secured in position, fixed to stakes if necessary, to avoid them toppling if a trapped animal were to move about.</p> <p>The number of traps deployed <b>must</b> be recorded in a field notebook and their location marked on a map or site plan. The locations must be clearly enough recorded so that all the traps could</p>	<p>Traps should be 'bedded in' on the ground surface, to ensure that they are stable and securely positioned. This may require the creation of a level base using a spade. The floor of the trap should then be covered with soil, taking care not to interfere with closure of the door.</p> <p>Where access is available, traps should be positioned at or close to the active setts, ideally beside runs radiating from the sett. They should not be placed directly on the runs, but to one side, with the trap entrance facing (ie parallel to) the run.</p> <p>Traps should be positioned to take advantage of any natural cover available to give trapped animals shelter from the elements (including exposure to wind/rain and over-heating from the sun) and to reduce the risk of third-party interference. Additional</p>

	<p>be found by another person, should the original operator be unavailable.</p>	<p>protection may be provided using materials available on site. Care must be taken to ensure that any materials used do not foul the trip mechanism. Traps should also be sited away from other hazards, including areas at risk of flooding and those containing livestock.</p> <p>Consideration needs to be given to the ease with which a trapped badger can be dispatched. Positioning of the trap needs to allow the accessibility necessary to shoot the badger or for the trap to be easily moved to a suitable location nearby.</p> <p>To minimise disturbance, and the risk of badgers deserting the site, all the traps at a single location should be placed on the same day, avoiding dusk and dawn, when they are likely to be active above ground. Additional traps can be deployed if required.</p>
<p><b>7. Pre-baiting:</b></p>		<p>Traps should be baited with animal grade peanuts for 3-10 days before they are set to catch, to encourage the badgers to enter the traps and maximise the number of captures.</p> <p>Peanuts can be placed in the trap using a spade or 40mm PVC pipe or by hand. Approx. 1-2 handfuls of peanuts should be placed in a heap near the back of the cage with a trail of peanuts laid down the centre of the trap and out of the open doorway. Peanuts should not be scattered widely in and around the trap because this may encourage badgers to dig under the trap from the outside or reach in through the mesh. On the first day of pre-baiting some peanuts may be thrown down and around the active holes to</p>

		<p>encourage badgers to look for the bait.</p> <p>Pre-baiting should be done as late as possible in the day, to minimise the opportunity for non-target species to take the bait. A large stone can be used to cover the heap of peanuts to minimise interference from smaller non-target species. Cage trap doors should be securely tied open with wire (minimum diameter 1mm) during the pre-baiting period so that badgers may freely enter but not be accidentally trapped.</p> <p>If, after a number of days, the bait remains untouched, other baits, such as oats, maize, fruit or peanuts mixed with syrup/honey may be tried.</p>
<p><b>8. Setting of traps:</b></p>	<p>The number of traps <i>set to catch</i> at each sett/trapping location <b>must</b> be recorded in the field notebook (NB this may differ from the number of traps originally deployed).</p>	<p>When adequate bait-take has been recorded, the traps should be set to catch. A final check that the traps are in good working order should be made to ensure they operate freely.</p> <p>When 'stringing up', the trap door can be held open by inserting the trigger arm on the door into the hinge plate on top of the trap (see Plate 2).</p> <p>Experience suggests that, following pre-baiting, most badgers will be caught in the first three nights of trapping. Setting traps to catch for much longer than this should only be undertaken if badgers continue to be caught; a maximum of 10 consecutive nights should normally be sufficient at any one trapping site. After this traps should be relocated to another site.</p>

## 9. Stringing up

Traps should be set to catch using one of the following methods:

### **'Twine Triangle Method'**

This involves the formation of a twine triangle trip-line inside the trap (approx. 6 squares from the rear of trap and 2 squares from the floor) just in front of the bait (see Plate 1). The end of the twine is then extended out through the top of the trap and along to the top hole of the hinge plate where it is tied. Ensure that the hinge plate is positioned more or less vertically, at  $\sim 90^\circ$  to the roof of the trap (see Plate 2). In wet weather, to allow for shrinkage, the twine should not be set too taut. The end of the trigger arm is then placed in the lower hole in the hinge plate, such that it will be easily pulled free when the string is moved and the door will close. Always test the door-closing mechanism before setting. The trap should be baited as before.

### **'Twine & Stone Method'**

Where large non-targets such as pheasants and squirrels are present, these species are more likely to trip the Triangle Method before badgers do. In this situation, an alternative approach is to tie the twine to the stone that is used to cover the peanuts during pre-baiting. The twine is then extended up the rear of the trap (on the outside) and finally tied to the trap hinge plate (Plate 3).

### **'Twine, Wire & Stone Method'**

Where non-targets such as mice and squirrels are a major problem, they may gnaw through the twine attempting to get to the peanuts under the stone. The result is a trap door that will not close when a badger moves the stone. To prevent this occurring use a short length of wire (diameter 2mm) to wrap around the stone, extend this approx. half to three-quarters of the way up the rear of the trap before attaching to the twine which is finally tied to the trap hinge plate (Plate 4).

**Plate 1: Twine Triangle Stringing Up Method:** the green line marks the line of twine from the hinge plate (which will be ~vertical when set) towards the rear of the trap, then through the roof into the trap 20-25cm from the rear, then out first through one side then the other, then back to join the central line of twine. This join should be made with a slip-knot that can be pushed down into the trap to form a triangular 'coat-hanger' shape, as shown. The other end of the string is then tied to the hinge plate with the door held open (as in Plate 2).



**Plate 2: Trigger mechanism of trap showing hinge plate in roughly vertical position (blue arrow) and tip of trigger arm passed through lower hole of hinge plate (orange arrow) to hold trap door open. The green arrow indicates the line of twine, once set, from the upper hole of the hinge plate, running towards rear of trap.**



**Plate 3: Twine & Stone Stringing Up Method**



**Plate 4: Twine, Wire & Stone Stringing Up Method**



<p><b>10. Checking traps:</b></p>	<p>Cage traps set to catch must be checked and any badgers caught must be dealt with as soon as practicable after dawn the following day. In any event, <b>operators must complete this before 12 noon.</b></p> <p><b>Operators have a legal responsibility under the Animal Welfare Act 2006 not to cause unnecessary suffering to any animal under the control of man – this includes a wild animal held in a trap.</b></p>	<p>The traps that are most at risk of exposure to the elements or to human interference should be checked first.</p>
<p><b>11. Non-target captures:</b></p>	<p>Any wild non-target animal captured should be released at the point of capture, unless it is a species that cannot legally be released (eg certain</p>	

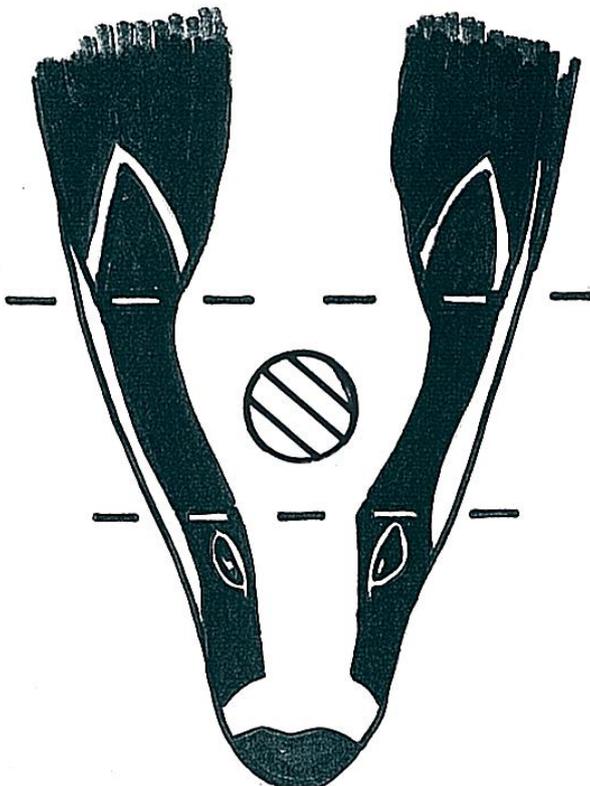
	<p>listed and non-native species, such as the grey squirrel), or humanely killed (unless it is of a species which it would be illegal to kill). Wild animals which are so seriously injured or in such a condition that it would be inhumane to release them must be humanely killed as soon as possible or taken without undue delay for veterinary treatment.</p> <p>Any domesticated animals caught without signs of injury should be released at the point of capture, or returned to their owners, if applicable. Injured animals must be taken for veterinary treatment without undue delay and their owners notified if possible.</p> <p>Non-target animals that are killed must be disposed of appropriately.</p>	
<p><b>12. Shooting of cage trapped badgers</b></p>	<p><b>The aim is to ensure that the captured badger is killed humanely and that the technique is safe for the operators, the public and any non-target animals in the vicinity.</b></p> <p>The use of artificial light in the course of trapping or dispatching trapped badgers is only allowed under licence and users must comply with the relevant Class Licence (WLM-CL04) issued by Natural England.</p> <p>In all cases, the badger must be settled before the shot is taken.</p>	<p><i>Mycobacterium bovis</i>, the causative agent of bovine TB, can pass from animals to people; protective clothing is advisable and face masks and eye-protection should be considered.</p> <p>Before shooting, the operator must ensure that all people in the vicinity are in a safe position, behind the line of fire. If there is a risk of interference from third parties, it may be necessary to abandon any attempt to shoot the badger(s). If so, the badger(s) must be released unharmed.</p> <p>On arrival on site to check the traps, the weapon to be used should be unloaded, with no cartridge in the chamber.</p>

		<p>Traps should be approached quietly and calmly so as not to stress any captured animals. As soon as the traps have been checked, if there are animals to be dispatched, the weapon should be loaded and any trapped animals dealt with without delay.</p> <p>If more than one badger has been caught in the same trap, extra care is needed. The operator will need to decide if they should be placed in separate cages prior to shooting or if they can be shot humanely, in rapid succession, in the same trap. The main considerations are minimising any physical suffering or stress to the badgers and ensuring operator safety.</p>
<p><b>13. Shot placement:</b></p>	<p>The shot must be taken at close range, with the muzzle of the weapon <u>inside the cage</u>, but not in contact with the animal (see below). Operators must take account of the ricochet risk from hard surfaces, such as the wire mesh of the trap or stony ground, and the risk of 'splashback' of tissue from the shot animal</p> <p>A well-placed shot to the head from close range (&lt;6 inches/15cm) should be overwhelming, resulting in rapid unconsciousness and death.</p> <p>Neck shots and body shots are <u>not</u> permitted for dispatch of trapped badgers.</p> <p>The target is the front of the forehead with the shot angled</p>	<p>The trapped animal needs to be in a position to allow a safe and humane shot. If the target area is not accessible, eg because of the way the badger is lying, then the animal should be coaxed gently into position until it is. The use of wickets to restrict the badger's movement should be considered if the animal is active.</p> <p>The weapon should be held so as to keep the shooter's body well away from the badger to avoid the risk of splashback of tissue hitting the shooter.</p> <p>The operators should then deal with any further trapped animals at that location, before dealing with the carcass.</p>

through the brain towards the brainstem (see Figure 1).

Immediately after shooting, the animal should be checked to ensure it is dead, and if there is any doubt, a second shot must be taken as soon as possible.

**Figure 1: Shot placement for humane dispatch of a cage-trapped badger: hashed circle shows the target area. Broken lines show approximate position of front and rear of brain using the position of the eyes and ears as markers .**



**14. Confirmation of death:**

After shooting a badger, regardless of first impressions (unless it is obviously still alive), an assessment should be made to confirm that it is dead.

Signs that must be checked for include;

- correct shot placement (ie entry hole is in the target area –see Fig.1)

A final check for signs of life must be made *at least 3 minutes after the final shot* to that animal and before the animal is bagged up.

- absence of rhythmic breathing (ie no chest movement / rise and fall)
- absence of eye movement / blinking
- eye wide open and the pupil dilated
- absence of large convulsions or muscle spasms (ie muscular movement / reflex).

The animal should be touched with a blunt instrument following the above checks to test for any reaction.

The cornea of the animal should then be lightly touched to confirm the absence of a blink reflex.

Disposable gloves should be worn when handling the animal.

Checks to confirm death must be made as soon as practicable after the shot has been taken and initial checks should be made within 1 minute. However, if involuntary muscle convulsions occur, final checks will need to be delayed until these have ceased.

Involuntary muscle convulsions affecting the limb and body muscles can occur within a minute of a shot through or near the brainstem and are consistent with a correctly placed shot. These generally last for no more than one to two minutes and animals remain unconscious

		<p>throughout. Absence of convulsions does not mean that the shot was unsuccessful. Final checks should not be made until any convulsions have ended.</p> <p>After all the animals at the site are confirmed dead the firearm should be emptied of any remaining ammunition and stored safely.</p>
<p><b>15. Carcase handling</b></p>		<p>Badger carcases will not routinely be collected for post-mortem examination or disease analysis, but some may be required for monitoring purposes.</p> <p>In handling carcases, particular attention should be paid to health and safety issues to avoid possible aerosol transmission of bacteria and other potential hazards such as ticks or other parasites.</p> <p>Operators do not need a licence to handle dead badgers as long as they have been taken and killed lawfully.</p> <p>Operator safety: badger carcases and any material from them (urine/faeces/blood etc.) may contain TB and provide a source of infection. Operators should take appropriate action to minimise the chances of spreading this material around and infecting themselves, colleagues or the area in which they are working. Appropriate protection should be worn (eg gloves, mask, overalls, and washable boots).</p>

		<p>Carcases being transported from the shooting site to any other location, such as a collection point, need to be appropriately bagged and transported in a covered vehicle or out of sight if in an open-backed vehicle.</p>
<p><b>16. Carcase bagging</b></p>	<p>Carcases must be individually labelled to indicate that they are badgers for disposal as Category 1 Waste.</p> <p>Carcases must be double-bagged as soon as is reasonably practicable using a heavy-duty PVC sack as the inner and a heavy-duty garden refuse sack as the outer.</p>	<p>Bagging should be carried out at the site where the badger is killed unless there is good reason not to do so.</p> <p>Great care should be taken and disposable gloves worn at all times when handling carcases.</p> <p>Take the first bag and:</p> <ul style="list-style-type: none"> <li>• roll it down three-quarters;</li> <li>• carefully place the carcase inside while averting the face (to minimise the risk of aerosol inhalation);</li> <li>• unroll the bag;</li> <li>• “goose-neck” the bag (ie hold the bag closed above the carcase, twist the upper part of the bag like a rope and then bend this down);</li> <li>• either knot the “goose-neck” or tie it with PVC tape, strong string, a cable-tie, or similar.</li> </ul> <p>The first bag must then be placed in the second.</p> <p>The second bag is then “goose-necked” and either</p>

		<p>knotted or tied, as above.</p> <p>Gloves must be disposed of in accordance with local Clinical Waste Disposal Instructions.</p> <p>Following the above procedures will help avoid possible aerosol transmission of bacteria from carcasses.</p>
<p><b>17. Storage</b></p>	<p>Bagged carcasses must be stored on an agreed safe site pending collection. Alternatively, collection points may be established but these must be approved by Animal Health and Veterinary Laboratories Agency (AHVLA) as a handling site. Transporting the badger carcasses to such a site would also need to be done under animal by-products rules on transport using an approved or registered operator.</p> <p>Under the European Union Animal By-Products Regulation (Regulation EC No. 1069/2009) (see below), carcasses must be collected, identified, and transported without “undue delay” and disposed of in accordance with the Regulation. The length of time a carcass can be stored requires judgement as it is dependent on several factors such as the season and the appropriateness of the storage conditions (eg refrigeration and protection against vermin).</p>	<p>A carcass must be in a condition that a collector will accept. Carcasses must not be stored outdoors or where scavengers such as foxes, dogs or rats could have access to them. This can be achieved by storing carcasses in a vermin-proof building.</p>
<p><b>18. Collection</b></p>	<p>An appropriate collection service would need to be put in place. As badger carcasses may be harbouring bovine TB</p>	

	<p>they are considered Category 1 material and all material collected as part of this round will be classed as Category 1 material. The EU ABPR prohibits bringing animal by-products on to any premises where livestock is kept. Therefore carcasses must not be removed from a vehicle when at a livestock premises to collect other animal by-products.</p>	
<p><b>19. Cleansing and disinfection of equipment</b></p>	<p>Arrive at a farm in a clean vehicle. If equipment is to be used on more than one farm, then before moving to the next farm equipment which might transfer disease, such as overalls and boots, must be cleaned of biological material (soil etc) and then disinfected with an appropriate disinfectant<sup>1</sup>.</p> <p>Traps must be cleansed and disinfected before being moved to another holding and special care should be given to those that have had badgers shot in them.</p> <p><b>Under no circumstances should traps move from farm to farm without prior cleansing &amp; disinfection.</b></p>	<p>Following disinfection, the traps should be rinsed with clean water to remove the smell of the disinfectant which might deter badgers from entering the traps.</p>

<sup>1</sup> The list of approved disinfectants for use in TB control can be found at [http://disinfectants.defra.gov.uk/Default.aspx?Location=None&module=ApprovalsList\\_Sl](http://disinfectants.defra.gov.uk/Default.aspx?Location=None&module=ApprovalsList_Sl)

## Other requirements

### Animal by-products regulations

- The European Union Animal By-Products Regulation (Regulation EC No. 1069/2009) (EU ABPR) lays down health rules concerning animal by-products. The

Regulation divides animal by-products into three categories, according to the degree of risk which they pose, and specifies the permitted treatment or disposal routes for each category. Wild animals normally fall outside the scope of the Regulation but when they are “suspected of being infected with diseases communicable to humans or animals”, they fall within the list of Category 1 materials (Article 8(a)(v)). Bovine TB is a zoonotic disease and therefore the carcasses of any badgers suspected of harbouring the disease fall within the definition of Category 1 animal by-products.

- Category 1 materials are required to be collected, transported and identified without undue delay and either incinerated in an approved incineration plant or processed in an approved rendering plant, with the processed products being finally disposed of as waste by incineration or burial in an approved landfill. Burial without first processing is not a permitted disposal route for such Category 1 material.

## Monitoring of sett activity

- The placing of small twigs or straw in sett entrances, in order to record animals passing in or out of the sett, can be a useful technique for monitoring sett activity. As long as the materials are lightly placed, and do not obstruct the access of badgers to or from the sett, this does not require a licence. In addition, in suitable conditions, a small amount of sand placed on the ground at sett entrances can be used to detect paw prints, and again does not require a licence.

## Health and safety

- An appropriate risk assessment should be conducted before any shooting is carried out and thorough controls put in place to ensure safety of the general public and of all involved in the operation. Reference should be made to Health and Safety Executive leaflet AS7 (rev) ‘Guns’ (<http://www.hse.gov.uk/pubns/as7.pdf>) and in addition relevant shooting organisations should be able to provide appropriate information on safe handling of firearms.

## Record keeping

- Certain information will be required in order to complete the licence return to Natural England. In addition, it is best practice to record on a daily basis what has been done, where, and by whom. Day-to-day details of the control operation should be provided by the contractor and passed to the licence co-ordinator to enable him/her to complete the necessary licence returns. It is vital, therefore, that adequate and accurate records are kept.

- Records must include participant number, location, number of trapping teams and trapping nights, and the actual location at which each badger was trapped. Trapping locations should be recorded to individual field reference number.
- This information is likely to be sensitive, so care must be taken not to lose field note books or leave them unattended (eg in unlocked vehicles). Loss must be reported to the cull co-ordinator and the police as soon as possible.

## **Natural England compliance monitoring**

- To ensure compliance with licence conditions and the Code of Best Practice, Natural England will undertake a series of monitoring visits of selected Contractors.
- A Natural England Monitor will accompany Contractors while they are checking cage traps to observe firearms handling and safety, dispatch of badgers and bagging/tagging of carcasses. Natural England Monitors cannot act as a buddy.