Written evidence submitted by Secret World Wildlife Rescue

I am writing to you as you are interested in the opinions of people on the new invasive species act. Personally I am devastated by the new legislation in regard to culling grey squirrels and forcing animal rescue agencies to euthanise healthy squirrels that come in which just goes against everything that we stand for. I am unhappy with the government response letter for the Petition on ‘Make grey squirrel rescue exempt from Invasive Alien Species Order 2019’, because I believe the concerns of the petitioners were not actually addressed. Currently Natural England issue licences to most large wildlife rescue centres to allow the grey squirrels to be rescued, cared for and only released into areas of England where they pose no threat to native species such as red squirrels. Most grey squirrels admitted are orphans, rescued by compassionate members of public who value the life of other sentient beings. The new legislation would require all rescue centres and veterinary surgeons to euthanise perfectly healthy squirrels, muntjac deer and Canada geese. As a wildlife rescue practitioner and advocate for animal welfare, I am asking for these regulations to be rejected in relation to grey squirrel rescue and release at wildlife centres in areas with no red squirrels. I believe that the welfare of various wildlife will suffer as a result of the legislation with the following points being my main concerns:

- If rescue centres automatically put down healthy orphans upon admission, concerned members of public will attempt the rear them at home, rather than have them euthanised. This will have great risk to the welfare of any animal being reared by someone unexperienced. Amateurs will not have the knowledge required for the healthy upbringing of a grey squirrel, nor the syringe feeding required for orphans. This could lead to slow and painful deaths of infant squirrels as a result of milk aspiration, pneumonia and metabolic bone disease, a disease common in those that are fed the wrong diets. Furthermore, these badly reared squirrels will be released back into the wild, without any regard of where they are, at least under the current licence the records, numbers and locations of grey squirrels are tracked.
- The policy will have no impact on the overall populations of non-indigenous species as the number of animals released under the current licensing system are insignificant in terms of numbers and only significant to those who care for the protection and health of our wildlife.
- Over 56,000 people have signed this petition even though the new legislation still isn’t wildly known. The new regulations should not be kept quiet, and the public should be given all the facts and allow to decide for themselves if they support the new regulation. We are meant to live in a democracy where the opinion and voice of the public is important.
- Enforcement of the new regulation will be a waste of tax payer’s money and resources. The current licensing system works well and should be continued as money is not wasted on the euthanasia of perfectly healthy animals.
- All animals that pass through rescue centres have to be signed off as healthy before they are released. This actually works to eliminate the squirrel pox virus as the squirrels released are clear, potentially immune and unable to pass the pox into the populations of red or grey squirrels.
I believe that the government response letter is not scientifically or ecologically accurate often stating hypocritical statements. The main problem with the letter is that is has a misleading view of the grey squirrels causing the demise of the red squirrels. The biggest cause for the population decline of reds in the UK is the destruction of habitat by mankind and mass hunting that nearly resulted in their extinction in the 18th century, meaning they had to be reintroduced from Scandinavia. In previous times the red squirrels were culled for almost the same reasons the greys are being persecuted now, being considered pests causing damage to trees. The actual causes of red squirrel decline can be found in the attached pie chart showing the results of the research of Ritchie 1920, Gurnell 1987, Harris et al. 2006, showing how small an effect that squirrel pox supposedly from grey squirrels has on the overall population. Poor practice in forestry also results in significant decline of red squirrel populations, leading to local extinction, as found by Lurz et al 1998. In order to protect the remaining red squirrels the correct habitat must be in place meaning that even if all grey squirrels were eradicated, the numbers of reds would still be decreasing. If the new legislation is genuinely about the preservation of the native red squirrel, then efforts would be better placed in rebuilding natural coniferous forests rather than prosecuting grey squirrels. The main hypocrisy within the government’s reply is stating the fact that grey squirrels need to be eliminated due to the bark stripping and damage they cause, whilst also claiming that they are doing it to protect the red squirrels. Both of these statements cannot be true at the same time. Supposing all greys were eliminated and the population of reds increased, the red squirrels would cause exactly the same amount of damage and I do not believe that the government would then propose to eradicate red squirrels in the same manner as the greys, considering they have historically been persecuted for precisely this reason leaving us where we are now: with attempts at increasing the red squirrel population. At this point in time grey squirrels have naturalised in the UK, like little owls, meaning that it will be almost impossible to eradicate them all and we should learn from the past attempts to cull squirrels where we regretted our actions.

I am hoping that the new legislation can be stopped, allowing rescue centres to continue to care for and raise grey squirrel. It will be heart-breaking to put down every squirrel that comes to us regardless of its health, especially as there is evidence that the grey squirrels are not the biggest impact on the population of the red squirrels, and do not cause irreversible damage to trees. Please can you look more into this matter, read up on the research into the effects of keeping grey squirrels in our country (I have suggested some articles below), and try to stop the unnecessary legislation that stops animal rescue agencies caring for all our wildlife.

Analysis of scientific research about the reasons of red squirrel population decline in the UK (Ritchie 1920, Gurnell 1987, Harris et al. 2006).
Is culling of grey squirrels a viable tactic to conserve red squirrel populations? (Ritchie 1920, Shorten 1954, Harris et al. 2006).
The ecology of squirrels in spruce dominated plantations: implications for forest management (Lurz et al 1998).
Analysis of scientific research with regard to the effect of squirrels on forest regeneration (Vander Wall 1990, Steele et al 1993, Goheen and Swihart 2003, Zong et al 2009).
Graph from the Analysis of scientific research about the reasons of red squirrel population decline in the UK report, showing the found causes of red squirrel decline.

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