Written evidence submitted by the Wildlife Aid Foundation

The Wildlife Aid Foundation operates one of the UK’s longest established wildlife hospital and rescue centres. Like several other wildlife rescue services, we will be adversely affected by the changes the law will introduce relating to the licensed release of rehabilitated grey squirrels. We have a number of concerns about the policy changes which require consideration and response.

- Squirrels in areas currently under license cause minimum damage to forestry.
- The current red squirrels are not native to the UK, but a Scandinavian introduction.
- It will be impossible to re-establish greens where the grey currently thrive as there is no suitable habitat.
- Reds exposed to squirrel pox can develop immunity.
- Reds are not endangered in Europe.
- Greys help plant trees as they are scatter hoarders.
- Containment is not an issue as we are an island nation.
- Greys are established, having been introduced nearly 200 years ago.
- The numbers seen in rescue are insignificant.
- There is a risk of offences being committed under the Abandonment of Animals Act (1960)
- Vets and rescue centres will be forced to euthanise healthy animals, which could have a significant impact on mental health.
- There will be a significant impact on business, charities or voluntary bodies.
- We are asking for rescues to be exempt from this legislation and for the current licensing system to remain in place.

1. The initial reasoning behind the withdrawal of these licenses was flawed from the beginning, based as it was on figures taken from an outdated study that looked at the impact of invasive species as a whole, rather than grey squirrels in the very specific geographic areas where the licence system exists. In truth, squirrels in these areas cause a very small amount of damage to some commercial forestry, but no more so than other wildlife. The specifics have not been investigated, and instead a broad brush has been used to vilify one species.

2. The policy is based on a false narrative of ‘alien’ grey squirrels vs the ‘native’ red. This is incorrect as the red squirrel population was in decline before greys were introduced. Whilst it is true that greys are more adaptable to the changing British natural environment than reds, if you removed every grey, even in areas where the licenses are currently in place, reds would never re-establish themselves without a fundamental change in the whole ecosystem, which is a fanciful idea. Swathes of built up areas would need to be replaced with well-established conifer forests.

3. The species of red squirrels currently in the UK are not native. The British sub-species, sciurus vulgaris leucurus, is extinct, and the red squirrels living in this country today are genetically mixed products of Scandinavian introduction.

4. Another reason given is that greys spread squirrel pox. They are immune to it, this is true, but pox is responsible for only 2% of red squirrel mortality. It is 90% fatal to reds, and the surviving red squirrels develop an immunity to it and pass this to their offspring. The
process of disease transmission is such, that they are far more likely to get it from fellow reds, rather than greys.

5. Red squirrels are not an endangered species in Europe.

6. Greys perform the same function in the ecosystem. In fact, as scatter hoarders, as opposed to the larder hoarding of the reds, they are responsible for the planting of a substantial number of trees.

7. In defence of the policy changes relating to the licensed release of rehabilitated greys, Lord Gardiner of Kimble has stated that the UK has an obligation to protect its European neighbours from encroachment by greys. The containment measure, as specified in Article 18 of Regulation No 1143/2014, is that the UK is an island nation. The only way greys from the UK could threaten mainland Europe would be if they bought Eurostar tickets and took the Chunnel!

8. After 200 years, greys are an established part of British fauna.

9. The current licence system applies to less than 700 animals. In relation to overall numbers this is insignificant. Withdrawing licences would have absolutely no impact on populations but will have far reaching welfare implications.

10. If rescue centres are unable to treat orphaned and injured greys, there is a very real risk of offences being committed under the 1960 Abandonment of Animals Act, as the finders may dump helpless baby squirrels back in the wild. Alternatively, the members of the public who find them may try to look after them in their own homes, which is dangerous and harmful to the animal. Furthermore, there is a very real concern, that those who do survive this black market rescue, will be incorrectly released. Whereas the current licensing system controls these areas, it will instead become a free for all, with no regulation whatsoever.

11. If rescue centres are unable to release, vets, who have an obligation to alleviate suffering, will be forced to euthanise animals bought in by members of the public which could otherwise have been treated and returned to the wild. This will have impacts on vets' mental health and also on public goodwill towards centres and charities.

12. It has been suggested that under some circumstances, captive licences may be allocated to allow organisations to treat and then keep greys captive. This is cruel and is likely to contravene animal welfare rules. Wild greys have an average lifespan of up to 6 years, whereas in captivity this can extend to as long as 20. Rescue centres would rapidly reach capacity and despite assurances to the contrary, would then be forced to euthanise healthy squirrels. It will also mean that other species may have to be turned away, when they previously could have been rescued and rehabilitated.

13. It is mentioned in the Exploratory Memorandum to the Invasive Species Regulations 2019, that “The impact on business, charities or voluntary bodies is expected to be little or none.” It could not be clearer, that this is simply not the case and will in fact negatively affect all three.
14. Quite simply the policy persecutes grey squirrels based on flawed information and misguided arguments. The most sensible and humane course of action would be to make rescued animals exempt. By taking injured and orphaned greys for treatment and returning them back to the wild, rescue centres have no impact at all on populations and spread and so are being unfairly penalised.

It is for all the above reasons that we would ask that the current licence system be left in place.

Key questions need to be answered:
If the captive licences are to be made available, organisations need to be given full details of what they entail and how to apply long before the October deadline. For example, will the number of squirrels permitted to be held captive be limited to a certain number per year, or will this be cumulative?
When the change comes into force, will it include animals currently being treated, or will they be exempt?
What does DEFRA advise wildlife centres tell members of the public who bring in grey squirrels after the October deadline?

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