Written evidence submitted by Tiggywinkles Wildlife Hospital

In regard to the impending enforcement of the “Invasive Alien Species Order 2019” Tiggywinkles Wildlife Hospital is encouraged and optimistic that the Environmental Audit Committee is looking carefully at the consequences of this Order becoming legislation.

As stated on the gov.uk website, this committee is charged with, among other things, questioning how well the UK Government protects the environment. In this instance Tiggywinkles, as the busiest wildlife hospital in the UK (and indeed the World), staffed with a Specialist veterinary and nursing team, strongly believe that the Government is making a markedly misguided choice in the implementation of this Order in relation to grey squirrels and muntjac deer.

While supporting the measures to control the importing and breeding, and therefore the spread of certain alien species, we believe that, in relation to grey squirrels and muntjac, the Order does not adequately follow the letter and spirit of the EU Regulation 1143/2019 which it is supposed to be translating into the British system.

We would strongly urge you to consider making rescue by registered wildlife centres exempt from the Order, as rescue numbers are not significant for the overall populations, but are very significant in terms of humanity’s compassion footprint. Given that we release up to 50 of each species (under licence) per year, this represents somewhere around 0.0025% or 1 in 40,000 individuals. This will have no impact on the numbers in the wild but failure to accept or release these individuals will have a massive emotional and traumatic effect on the wildlife centre staff and on the members of the public who bring them to us, and other rescue centres in good faith. This will have a knock-on effect of reduced support and engagement with wildlife centres and, as a consequence, these actions against squirrels and muntjac will negatively impact on ALL British wildlife.

It is also interesting to wonder exactly how the police force is going to go about ensuring compliance and whether this is a justified use of public funds. Convictions for the “offence” of helping a grey squirrel or muntjac are bound to cause a public outcry, especially if the public are “expected” to let them suffer in the wild or be brought to a wildlife centre to be euthanased.

The Government is stating that the animals do not have to be euthanased but can be retained in captivity. I am not sure there are many rescue centres that could cope with housing wild squirrels and muntjac in the numbers required for the time required. Establishments would very rapidly become full or overrun, creating welfare issues and then still ultimately leading to the choice between refusal to accept into the wildlife centre, or automatic euthanasia because of lack of available space and resources. All this, even though the release of very small numbers is completely insignificant. Making it a wildlife crime to release back into the habitat rehabilitated grey squirrels and muntjac that were taken from there in the first place is not, therefore, a proportionate response.

With respect to squirrels specifically, the arguments have been previously well stated and referenced by us and other organisations. The reported displacement of red squirrels, the role of pox virus and the financial costs to the timber industry are all overstated and the literature has been misrepresented to achieve a goal. To justify eradication of a species must be based on very clear and specific scientific research, not protestations by the misinformed or those with ulterior motives. Another non-truth is to lump grey squirrels and muntjac in with the statistics that include invasive plant species such as Japanese knotweed. When people report financial costs of ALL invasive species, including squirrels and muntjac as a contributor to the problem, the actual cost and impact of these species in the overall picture is markedly insignificant.
Tiggywinkles Wildlife hospital is proud to have served Great Britain’s wild animals for over 40 years and is the largest and busiest hospital of its kind in the UK. Members of the public look to us to take in, care for, and release all wild animals. Betraying this trust by keeping or ultimately euthanasing rehabilitated wild animals would be unacceptable. For this reason, we urge the Government to grant licences for specific wildlife centres so they may continue doing the good work they do. If there would need to be conditions on the licence or even measures taken to help with the Government’s overall strategy on invasive species, then we can look at helping and supporting this but to prevent release of all our rehabilitated grey squirrels and muntjac deer is a situation we cannot imagine.

May 2019