1. Summary

1.1 The RSPCA is pleased to respond to this consultation. The RSPCA is the oldest and largest animal welfare organisation in the world and has over half a million supporters. Last year the RSPCA rescued and admitted over 18,000 wild animals through our four wildlife centres and had calls to rescue a number of species that fall under the Invasive Alien Species legislation. This legislation includes animals that fall into two categories - those that are commonly found and are widespread in the UK, such as grey squirrels and muntjac deer and those that are not but pose a threat such as raccoon dogs and racoons. The RSPCA has to deal with both types of species. This response only deals with those species that the RSPCA experiences.

1.2 The RSPCA supports the Invasive Alien Species (Enforcement and Permitting) Order 2019 and believes that species action plans should prioritise the control of those species that are yet to become established in the UK but where imports and potential for release into the wild are increasing. These include raccoon dogs, racoons and coatis.

1.3 The RSPCA believes that species already widely established in the UK, such as grey squirrels and muntjac deer should be tackled at a local level where there is a threat to existing indigenous species such as the red squirrel but their widespread nature means it will be impossible to put in place an eradication management plan at a UK level. Two of these species can currently be released under licence from Natural England, but only in areas where it is thought such releases would not alter the status quo. The negative welfare consequences of stopping the release of rehabilitated individuals of these species could be an increase in unregulated rehabilitation and release, with subsequent enforcement problems of uncontrolled release rise, undermining the intent of the legislation. This was the situation before licences were issued prior to 2007.

2. How well is the UK and its overseas territories managing the impact of invasive species and controlling the risks of further invasion?

2.1 The RSPCA believes not well although the legislation laid in Parliament last month (Invasive Non-Native Species (Enforcement and Permitting) Order 2019) will finally set out the Government’s plans on species action plans in England. This finally implements the provisions of Regulation 1143/2104 which came into effect on 1 January 2015. This designated 26 animal species listed as needing action plans. In England these include introduced aliens species such as coypu, muntjac deer, coati, raccoon dog, ruddy duck, red eared terrapin, and grey squirrel. Some of these species are already widely spread in the UK such as the grey squirrel and muntjac deer. Others are already subject to existing action plans such as the ruddy duck. Others are not widespread but are traded and kept as pets, that are often abandoned and have the potential to become problematic such as the raccoon dog, coati and raccoon. The RSPCA believes that these animals should not be kept as pets as the welfare needs, as defined under the Animal Welfare Act, cannot be met.

2.2 Most species do not have action plans and Natural England will have to consult and agree the actions plans on those species by 1 October 2019. The RSPCA supports the intent of the 2019 Order to control the trade and keeping of certain non-native species. We have seen a rise recently in the abandonment of some of the listed species such as raccoons, racoon dogs and
coatis, and believe these should not be kept as pets. We are concerned that more of these are being imported and/or bred as pets, and being abandoned when the owner can no longer cope with, or loses interest in them. Inevitably it is the RSPCA that is called to collect them. We then have to assess where to put them as they cannot be released back into the wild and should only be rehomed with expert keepers. Long-term, we also do not want see a cull in the UK of species like raccoons if they become established in the wild and wish to prevent this happening. We therefore support adequate restrictions on the introduction, trade in and keeping of any listed species such as racoon dogs.

2.3 The RSPCA rescues and rehabilitates species on the list considered as widely distributed in the UK such as muntjac deer and grey squirrel. These can only be released under licence issued by Natural England; no such releases are licensed in Wales. The RSPCA has licences to release these species in certain circumstances. The RSPCA has been informed that because the new legislation does not allow for releases of these species, existing licences in England to allow the release of grey squirrels and muntjac deer will be revoked or will not be renewed. As far as we are aware, all licence holders have received letters stating their licence will be revoked, although this decision has been suspended following the announcement of a consultation on these species action plans, due to be launched this summer. As we will no longer be able to take these animals into captivity and as we do not believe in the long-term confinement of wild animals if there is no prospect of release into the wild, euthanasia is the only option. This has potential risk to damage the reputation of the RSPCA given that we have been accused in the past of classifying grey squirrels as vermin and it is likely that such accusations would again surface. We believe that with certain widespread species, such as muntjac deer and grey squirrels, species action plans should include the provision to continue licensed release from captivity in certain circumstances.

3. Of those that are already in the UK, which invasive species are posing the greatest harm to: human health; animal health; plant health and biodiversity.

3.1 We have no information to answer this question

4. Where should the four nations prioritise resources to tackle invasive species?

4.1 The RSPCA believes that resources should be prioritised to control imports and prevent the establishment in the wild of those species that are not commonly widespread in the UK such as raccoon dogs, racoons and coatis. The new legislation puts in place important measures to stop the import, sale and release of these animals which the RSPCA supports. We are concerned that the pet trade and increasing desire for these species from consumers will increase the threat of these species becoming established in the wild. The RSPCA is seeing more complaints to its call centre on these species being abandoned or on pet owners wishing to offload these animals once they become expendable. There are few opportunities to rehome these animals at present but it is hoped that the new restrictions will result in a reversal of the trend that we are experiencing of more animals being imported, bred, sold and abandoned.

4.2 However the RSPCA, which rescues and rehabilitates muntjac deer and grey squirrel, does not believe these species should be tackled as a priority. Currently, these can only be released under licence issued by Natural England; no such releases are licensed in Wales. The RSPCA has licences to release these species in certain circumstances. The Order does not allow for release of these species in England and current licence holders have received letters stating their licence will be revoked. As we will no longer be able to take these animals into captivity the only option
would be to euthanise any rescued animals or keep them permanently in a sanctuary. The RSPCA, for animal welfare reasons, does not believe in the long-term confinement of wild animals if there is no prospect of release into the wild. So euthanasia is the only option. We believe that with certain widespread species, such as muntjac deer and grey squirrels, species action plans should include the provision to continue licensed release from captivity in certain circumstances.

4.3 The RSPCA releases relatively few grey squirrels (around 82 per year) and around 100 muntjac deer per year and as such any release of these animals will make little difference to the wider population, a crucial consideration when making the decision on permitting release. Natural England already imposes strict criteria on how and where to release muntjac deer and grey squirrels in particular to ensure they do not impact on red squirrel populations. Current advice is also that the rescue and immediate release of muntjac deer or grey squirrels is allowed if they have been accidently caught, e.g. if they are caught and released from netting and they do not come into captivity for further rehabilitation.

4.4 The removal of a regulated process for the rehabilitation of these species will have a number of negative consequences. The public will be concerned that rehabilitators can no longer help these animals, leading to a backlash if euthanasia is the only option. The new law could also lead to unregulated rehabilitation of animals, resulting in potentially poor welfare outcomes and illegal release into the wild, one reason why the original licensing system was introduced to try and prohibit.

5. How can the risk of trade and future trading relationships bringing non-native invasive species to the UK be mitigated?
5.1 The RSPCA has seen an increase in certain species, particular raccoon dogs, being sold and abandoned in the UK. The new law has useful provisions to stop the import, sale and release of these species but enforcement will be crucial to ensure, for instance, that none of the proscribed species are offered for sale on the internet. It is unclear which agency would undertake this role and if there are sufficient resources for this activity.

Future trading agreements need to weigh up the benefits of the proposed trade, especially if it concerns live wild animals, and the potential welfare problems of keeping these animals in captivity, and the potential damage they can do if released into the wild. Furthermore, any future trading agreements need to consider the accidental importation of species that may arrive undetected, as stowaways with other produce. Opening up new trading routes increases the numbers of potential pathways for such stowaways, and the RSPCA is often called to deal with such species, as there is no Government agency that has responsibility for this matter. The development of new trading relationships needs to be accompanied with increased biosecurity to prevent the arrival of unwanted species.

6. How effective have the European Union’s Invasive Alien Species Regulations been at addressing and tackling invasive species?
6.1 In the UK it is too early to tell as no action plan has been agreed and enacted. However the UK has had some success in eradicating coy璞u and controlling and managing the ruddy duck where there has been a management culling plan in existence for over a decade and the species has now effectively been eradicated from the wild. For other widespread alien species such as the grey squirrel or red eared terrapin action plans have had little impact on the species. It would
also be questioned whether a management plan that advocated widespread culling of a commonly established species such as the ring necked parakeet or grey squirrel would be successful either from a public perception or effectiveness viewpoint.

7. In the event of EU exit, how should the UK establish its replacement for the European Commission’s scientific forum to update the species list of concern?

7.1 The Joint Nature Conservation Commission, which is the UK’s Scientific Authority at CITES, should be the scientific forum working with the Non native Species Secretariat.

8. How should the UK work with the European Commission and others internationally to reduce the risk of invasive species?

8.1 The UK should continue to share information with the European Commission on the impact and effectiveness of its species action plans.

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