

**PROTECTING SCOTLAND'S RED SQUIRRELS**  
**A draft strategy for targeted grey squirrel control**

**Response by Advocates for Animals**

Respondent Information

NAME Libby Anderson  
ORGANISATION Advocates for Animals

**Consultation Title: Grey Squirrel Control Strategy**

ARE YOU (please tick one):

The owner or manager of a an area identified for controlling grey squirrels?

Another individual or land manager (go to question 2a)?

Acting on behalf of a group of organisation (go to question 2c) **YES**

**2.c ACTING ON BEHALF OF A GROUP OR ORGANISATION**

Please make my response, name and address all available

**3. SHARING RESPONSES/FUTURE ENGAGEMENT**

I am happy for you to contact me again in the future about this consultation response.

## Grey squirrel control strategy

The consultation paper asks for views on the proposed strategy. In particular,

- whether the aims of the strategy are adequate for red squirrel protection in Scotland;
- whether the proposed method of funding is appropriate or whether there are other sources of funding which could contribute; and
- whether appropriate locations to control have been identified, or whether there are more strategic areas which would be more efficient or sustainable.

The strategy has four main aims:

- To control, and where possible remove, the risk of squirrelpox virus to red squirrels in Scotland, through a single, co-ordinated programme of grey squirrel control;
- To prevent further spread of grey squirrels in Scotland and, where possible, to remove populations and reduce the current spread;
- To support a core population of red squirrels including areas where they are, or will be, in competition with grey squirrels; and
- To ensure that all mechanisms identified, and agreed, within the strategy are in place by December 2009.

### **Q1 Do these aims cover all the actions needed to protect red squirrels? If not, why not?**

The strategy under consultation only concerns grey squirrel control, which is not the only action required to protect red squirrels. We are also concerned by the emphasis on killing grey squirrels as the primary means of controlling these animals, and we believe that alternatives such as habitat management should be given the greatest priority.

We disagree with the view, expressed in the Saving Scotland's Red Squirrels Business Case<sup>1</sup> that opposition to the culling of grey squirrels is a minority view and that "the majority of the public understand and accept the reasons for culling of grey squirrels." We would suggest that the public understand and accept the reasons for attempting to conserve red squirrels, particularly by non-lethal means – but that is not the same as accepting culling. A national opinion survey commissioned in 2009 showed that a clear majority of people in Scotland did not support a cull of grey squirrels, 54% of people did not believe that grey squirrels should be killed in Scotland in an attempt to conserve red squirrels, and only 34% of people were in favour of killing them<sup>2</sup>.

We support all of the benign activities proposed under the Scottish Squirrel Action Plan<sup>3</sup> including the consolidation of priority woodlands for red squirrel conservation and the establishment of stronghold forests. We believe that development of a squirrel pox vaccine and immuno-contraception for grey squirrels should be given greater priority.

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<sup>1</sup> Saving Scotland's Red Squirrels Business Case, page 40

<sup>2</sup> TNS System Three for Advocates for Animals, 28 Jan – 3 February 2008

<sup>3</sup> Scottish Squirrel Action Plan, paras 2.4.1 – 2.4.3

It is stated at page 2 of the consultation paper that it is not possible to eradicate the grey squirrel from Britain using current control methods, and this has also been stated<sup>4</sup> elsewhere. The consultation paper therefore refers to *removing populations* (page 3), but attempts at even local eradication may be unsuccessful. Studies<sup>5</sup> have indicated that culling regimes cause only a temporary reduction in grey squirrel density, and that recolonisation can be rapid. It has also been suggested<sup>6</sup> that localised culling will be offset rapidly by immigration from uncultured areas if a source-sink system is created: this may lead to higher populations in culled areas and may actually increase the speed of grey squirrel spread.

Advocates for Animals disagrees in principle with the large scale killing of one species with the ostensible aim of protecting another. Logically, targeted grey squirrel killing is to be preferred to widespread grey squirrel killing, but if this is the approach taken then a further **primary aim** of the strategy must be to avoid suffering to grey squirrels. The main aims of the strategy, stated above, should include this.

We suggest that it would be beneficial for the strategy to reflect discussions on humane methods of killing that have been held between Advocates for Animals, SNH and the Scottish SPCA, the resultant review of killing methods carried out under contract to SNH, and the Standard Operating Procedures for killing that are currently being considered.

The welfare guidance (page 12) should be more detailed. We are concerned that the consultation document refers readers to a Forestry Commission practice note<sup>7</sup> which describes grey squirrel control for the purpose of tree protection, not red squirrel conservation. This practice note refers to Warfarin which is extremely inhumane as a control method and is prohibited for red squirrel conservation.

We note that the Scottish Squirrel Group considered means by which Warfarin might be permitted for killing grey squirrels for red squirrel conservation in 2007<sup>8</sup>. This is extremely concerning and gives rise to doubts as to the priority given to animal welfare.

We note also that the concerns of Advocates for Animals and the Scottish SPCA regarding the problem of killing lactating females/dependent young were raised at a Scottish Squirrel Group meeting<sup>9</sup> and the decision was that SNH should build a case to justify the guidance in place. We have not yet seen such guidance and we think it unlikely that there could be any justification for allowing this to continue. The Standard Operating Procedures for the project should make it clear that killing of lactating females will not be permitted.

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<sup>4</sup> Gurnell J and Pepper H, 1993 *A critical look at conserving the British red squirrel Sciurus vulgaris*. Mammal Review, **23**, 125 -136 cited in Harris S, Soulsbury C and Iossa G, 2006 *Is culling of grey squirrels a viable tactic to conserve red squirrel populations?* University of Bristol

<sup>5</sup> For example, Gurnell J and Steele J, 2002 Grey squirrel control for red squirrel conservation: a study in Thetford Forest, cited in Harris et al

<sup>6</sup> Pulliam HR (1988) Sources, sinks and population regulation, *American Naturalist*, 132, 652 – 661, cited in Harris et al

<sup>7</sup> FC Practice Note No 4 August 2007

<sup>8</sup> Scottish Squirrel Group Minutes of meetings 24 January 2007 and 12 September 2007

<sup>9</sup> Scottish Squirrel Group Minutes of meeting 24 January 2007

We would agree with supporting a core population of red squirrels including areas where they are, or will be, in competition with grey squirrels, provided that this support is focused on non-lethal means such as appropriate forest management – maximising conifers and other tree species that are beneficial or neutral for red squirrels and sub-optimal for greys, and minimising large seeded broadleaves such as oak which the greys prefer.

Support for core populations of red squirrels can be augmented by specific local initiatives such as the provision of rope bridges in areas where road traffic casualties occur, as has been provided by Grampian Squirrel Group.

Given that it is unlikely to be possible to segregate reds and greys indefinitely, there needs to be greater acknowledgement of coexistence, and thought given to how to promote red survival in these circumstances. We acknowledge that grey squirrels have a natural advantage over reds when it comes to exploiting food sources, but it is known that they can co-exist, and have done, for example, for many years in Craigvinean Forest in Perthshire.

Recent research<sup>10</sup>, while identifying spatial and temporal trends in poxvirus disease suggesting that it would have a significant effect on the Scottish population of red squirrels within 25 years, also described the finding of SQPV antibody in eight red squirrels found over an eight-year period. These animals appeared to have survived exposure to the virus by mounting an immune response - the first evidence of immunity to SQPV in free-living red squirrels. The research concluded that “vaccine may be an effective management tool to protect the remnant red squirrel population”.

It would appear therefore that the single action that could contribute most to the survival of reds in proximity to greys would be the creation and delivery of an effective SQPV vaccine.

## **Q2 Do you think the strategy can be adequately managed using this structure? If not, why not?**

We note that the strategy will be delivered by a national steering group, comprising representatives from the statutory agencies and representatives of the main squirrel projects in Scotland and by local groups of key stakeholders who have an interest in red squirrels.

Plans to protect red squirrels, primarily by killing grey squirrels, have been ongoing for some considerable time now and by and large the main players in projects have remained the same. As a result the mindset and approach have also remained the same. While we have no objection to the promotion of commercial interests, it is clear that different interests will bring different priorities and interests to the table. For example, forestry interests have sought in the past to have squirrels classified as predators in order to qualify for grant aid<sup>11</sup>, although the Scottish Squirrels Group did

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<sup>10</sup> Sainsbury et al *Poxviral disease in red squirrels (sciurus vulgaris) in the UK: spatial and temporal trends of an emerging threat*. *Ecohealth* 2008 Sep; 5(3) 305+6 Epub 2008 Oct 16

<sup>11</sup> Scottish Squirrel Group Minutes of meeting 2 May 2006

not agree with this view. The Scottish Wildlife Trust influenced the direction of the SSRS project so that it would have a wider extent and thus be more efficient as a fund-raising tool. We suggest that the steering group should show more independence than this.

It appears from the consultation document that the national steering group will focus only on grey squirrel control rather than managing the wider Action Plan and/or the Saving Scotland's Red Squirrels Project, both of which the grey squirrel control strategy is intended to underpin. In this case it is essential that animal welfare is represented on the national steering group.

Similarly, local groups should not consist only of people who "have an interest in red squirrels" but should have some independent representatives to assess the value of the project to local interests and animal welfare.

**Q3 Do you think the Scottish Rural Development Programme is the best way to pay for the work involved in controlling grey squirrels under this strategy? If not, why not?**

As noted in the consultation document, public agencies and the Saving Scotland's Red Squirrels Project are already funding Grey Squirrel Control Officers and killing has been ongoing for some considerable time. As of May 2008, landowners have been able to access funds for red squirrel conservation (both grey squirrel control and habitat management) under the Scottish Rural Development Programme (SRDP). We note that the strategy will also influence the priorities for financial support for grey squirrel control through the SRDP. The SSRS business case<sup>12</sup> describes this as a major source of funding for private landowners wishing to undertake these activities and adds "Such a scheme requires robust guidance on methods and targeting to ensure legitimate gains are accrued for the species." We agree with this view.

Our concern regarding SRDP funding is that there is a contradiction between the purpose for which controlling under the strategy is ostensibly required – to conserve red squirrels - and the purpose for which applicants for SRDP funding would seek it. Currently most private grey squirrel control in Britain is carried out not solely or even principally on grounds of red squirrel conservation, but to reduce grey squirrel bark stripping damage to trees<sup>13</sup>. In order to ensure that it is clear that the purpose of grey squirrel control under this strategy is red squirrel conservation, we strongly recommend that applicants be required to demonstrate the purpose for which funded control will be carried out.

We note that according to the consultation document (page 4) "The priority given to applications will be influenced by whether they are in areas identified in this strategy so it is important to get these correct." This statement of course refers only to applications for funding to control grey squirrels. We believe that funding should only

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<sup>12</sup> Saving Scotland's Red Squirrels. Business Case. SNH 2008

<sup>13</sup> Scottish Red Squirrel Strategy 2004

be granted where the landowner can demonstrate that equivalent or greater action is also being put in place to improve habitat for red squirrels and generally encourage them by benign methods.

We assume that SRDP funding would not be given for control in Priority Woodlands, where it has been assessed that the need for grey control schemes should be minimal in most cases<sup>14</sup>.

We recommend that projects are subject to regular review to establish that they are benefiting red squirrels, and that spot checks on welfare procedures be carried out on all funded projects.

If public money is used to kill grey squirrels, any killing must be undertaken in the most humane manner possible. Grants must be dependent on all killing being undertaken according to a Standard Operating Procedure produced by Scottish Natural Heritage, to include:

- clear guidance on humane killing
- a mechanism for assessing and verifying that killing is done humanely
- assessment of the maximum number required to be killed in order to achieve the desired population level
- a commitment not to exceed this number
- prohibition on killing lactating females, so that dependent young are not left to starve to death
- recording of the numbers of animals killed
- monitoring by a welfare agency such as the Scottish SPCA.

#### **Q 4 Does the strategy identify appropriate locations for controlling grey squirrels to protect red squirrels? If not, why not?**

We are opposed to the lethal control of grey squirrels in areas which are free of squirrelpox virus.

Most of Scotland's red squirrels are in the Highlands and we think it would be preferable to devote funds to supporting this population, rather than killing disease-free greys elsewhere. Unfortunately resources appear to have been focussed more on grey squirrels elsewhere in the country<sup>15</sup>.

Advocates for Animals  
Edinburgh  
August 2009

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<sup>14</sup> Saving Scotland's Red Squirrels. Business Case. SNH 2008. Page 44

<sup>15</sup> Letter from SSRS, November 2008