

Petition

to Karmenu Vella, EU Commissioner for the Environment, Maritime Affairs and Fisheries
and Daniel Calleja Crespo, EU Director-General for Environment

- to exclude grey squirrels (*Sciurus carolinensis*)
from the list of invasive alien species of Union concern "for eradication" according to the
Regulation (EU) No 1143/2014 of the European Parliament and of the Council

The European Union introduced legislation obliging the United Kingdom, Republic of Ireland and Italy to implement from 2016 programmes of widespread culls of grey squirrels. For this reason in the UK alone there are plans to kill in 2016-2020 several hundred thousand of these beneficial [1] animals.

During the decision process for including grey squirrels in this legislation, significant ecological [1], financial [2] and social [3] damages which would be the result of widespread killing of grey squirrels were not considered.

The regulation (EU) No 1143/2014 does not even allow for "protective periods" (*a) for nursing squirrel females which will cause that every year **tens of thousands of nursing squirrel females will be killed and their young will die in imaginable suffering over several days – starving animals to death is a torture** in breach of animal welfare standards of the World Organisation for Animal Health against animal torture [1].

Starving one animal to death is considered an inhumane act of cruelty. Torturing thousands of animals in this way cannot be called anything else than ecological crime.

The only beneficiaries of including grey squirrels on the "list of species to be eradicated" **will be few owners of big commercial woodlands and a small group of companies and people killing wild animals for a living, such as grouse and pheasant shooting estates.**

As citizens of countries belonging to the European Union we do not agree to conducting mass killing of grey squirrels financed with our taxes – paid by our member states into the common EU budget.

We petition for excluding grey squirrels (*Sciurus carolinensis*) from the "list of invasive alien species of Union concern" to be eradicated within the European Union ("the Union list", according to provisions of the Regulation (EU) No 1143/2014 of the European Parliament and of the Council), for the following reasons:

[1] Ecological damage that would be caused by mass culls of grey squirrels

One of the EU priorities is to increase the forested area within its borders. Millions of euros are spent annually towards that goal.

Scientific research indicates that **grey squirrels are the world's greatest natural forest regenerators (Steele et al. 1996, Goheen & Swihart 2003, ICSRS 2015a)** responsible for planting tens of millions of trees a year. In the areas where their population declined as a result of ill-considered human activities the natural forest regeneration was threatened (Steele et al. 1996, ICSRS 2015a). **During the preparation of the Regulation no studies were conducted to investigate the potential negative effect on natural forest regeneration of the eradication of grey squirrels in the areas that they inhabit often for over 150 years.**

The most recent research and scientific analyses confirmed that in non-commercial woodlands grey squirrels create habitats beneficial for wild bird populations which has been acknowledged even by the Forestry Commission in England in their report (Forestry Commission 2006, Harris et al. 2006, ICSRS 2015b). The same Commission admit that *such habitats could be created artificially but it would entail additional – millions of euros annually – costs* (Forestry Commission 2006, ICSRS 2015b). Scientists have also established a positive correlation between the presence of grey squirrels and population increase of several most vulnerable bird species (Newson et al. 2009, Bonnington et al. 2014, ICSRS 2015b).

During the preparation of the regulation there were no studies conducted to investigate the potential negative effect of removing grey squirrels on threatened bird populations in a given area.

Also the supposed problem of alleged impact of grey squirrels on the population of red squirrels has been mis-reported for years and is frequently given as a "reason" to kill them. Scientific research has indicated that suitable habitat is the priority concern for sustaining, increasing and ensuring success of red squirrel populations (Gurnell & Pepper 1991, Huxley 2003, Bryce et al. 2005, Harris et al. 2006). Where suitable habitat is provided the population of red squirrels grows in the presence of grey squirrels (Conserve Ireland 2015, ICSRS 2015h). In the areas where for commercial reasons tree species unfavourable for red squirrels are planted the population of red squirrels declines regardless of grey squirrels presence in the area (Lurz et al. 1998). Currently for example in the UK even though the coverage of forested area has increased the actual availability of habitats favourable for red squirrels has decreased in the last decades. **Scientific research conducted in the last 20 years confirm that human activities are the reasons of over 80% of unnatural deaths in red squirrel populations** (Shuttleworth 2001, Dutton 2004, LaRose et al. 2010, Simpson et al. 2013, ICSRS 2015g). None of those studies however include the deaths caused by common felling of woodland areas beneficial for red squirrels and replacing them with tree species more profitable but unfavourable for red squirrels. DNA studies also showed that in the most of the area where grey squirrels occur in Europe (which is the UK) populations of grey squirrels were established earlier. The current population of red squirrels in the UK are descendants of individuals introduced from other countries after their earlier "eradication" in the UK (Hale et al. 2004, Harris et al. 2006, ICSRS 2015g).

[2] Financial damages that would be caused by mass culls of grey squirrels

The alleged problems caused by grey squirrels in commercial woodlands has been for several years exaggerated, often by organisations and companies which profit financially from killing grey squirrels.

Many wild animals may sometimes damage trees. For many years effective methods to avoid such damage by appropriate forest management have been known. Those methods are much more economical (Forestry Commission 2006, ICSRS 2015b) and effective than cull programs because they don't need to be repeated (Taylor et al. 1968, Mountford 1999, Huxley 2003, Forestry Commission 2006, Harris et al. 2006, ICSRS 2015c).

Scientific research confirms that killing grey squirrels due to incidental tree damage is not only ineffective but also usually has the opposite effect than intended (Lawton & Rochford 1999, Forestry Commission 2006, Harris et al. 2006, ICSRS 2015c).

In the last 65 years in the UK several million grey squirrels have been killed while tens of millions of pounds have been spent towards that goal. After each such action not only did their population not decrease but it led to the expansion into new territories (Lawton & Rochford 1999, Harris et al. 2006, ICSRS 2015h) (*b).

Similarly flawed 'reasons' were given for programmes of widespread killing of red squirrels that were conducted for example in the UK, which resulted in significant decline of the species (Ritchie 1920, Middleton 1930, Shorten 1954, Harris et al. 2006, Lovegrove 2007, ICSRS 2015g).

[3] Social damage that would be caused by mass culls of grey squirrels

Grey squirrels are a resilient species, able to live close to humans, often the only wild mammal species managing to survive in extensive urbanisation. For many people watching squirrels play is a profound source of enjoyment. In the majority of the areas in England, Wales, Ireland and in many parks in Italy the presence of grey squirrels is the only chance to encounter wildlife not damaged yet by human activity. In an increasingly impoverished natural world, it is crucial that young people in particular are able to experience nature meaningfully.

All social surveys done in the recent years point out that most people are vehemently against killing grey squirrels. This is important considering the demonization of grey squirrels and the wide-spread misinformation exaggerating the problems allegedly caused by grey squirrels that has been happening for decades.

In the UK alone in 2015 a social petition directed to the Forestry Commission was signed by nearly 150 thousand people voicing opposition to the introduction of another "program of grey squirrel cull".

Summary

If the program for biodiversity is not to result – like other programs so far in the last 65 years in the UK – in wasting millions of euros/pounds in public money – not counting the costs of ecological and social damages, grey squirrels must be excluded from "the Union list" of species for eradication. The current proposal of including grey squirrels on such list can only benefit a small minority of individuals and companies, mainly in the commercial industries of 'killing wild animals', such as shooting estates, which is surely an inappropriate allocation of taxpayers money.

A good alternative initiative that would benefit everyone concerned would be to pay those funds to commercial woodland owners not for killing grey squirrels but for planting – less profitable (Lurz et al. 1998, Harris et al. 2006) – forests favourable for red squirrels. Such solution, as opposed to killing grey squirrels, would benefit everyone.

(*a)

None of the countries affected by the Regulation (EU) No 1143/2014 has implemented – nor has plans to implement – legal provisions to prevent the situation when young grey squirrels, completely dependent on their mothers and whose mother has been "eradicated", die in great suffering starving to death over several days. Starving animals to death is nothing else than torture against the standards of animal welfare of the World Organisation for Animal Health referred to in the Regulation (EU) No 1143/2014. This is the basis for the exclusion of grey squirrels from the "list of invasive alien species of Union concern".

(*b)

Except for a small population on the island of Anglesey which is separated with a natural water barrier from the population living on the mainland UK.

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