

# **Destructive Imported Animals Act 1963, Wildlife Act 1990:**

Consultation on the introduction of red squirrels and the amendment of legislation to allow consideration of an application



**Department of Environment, Food and Agriculture**  
*Rheynn Chymmltaght, Bee as Eirinys*



**Isle of Man**  
**Government**

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## Summary

This consultation seeks your views on the introduction of red squirrels to the Isle of Man, and specifically, on the removal of this species from the Destructive Imported Animals Act 1963 and its addition to Schedules 5 and 8 of the Wildlife Act.

The following questions are posed:

Q1. Do you agree with the removal of red squirrels from the Destructive Imported Animals Act 1963 and their addition to Schedules 5 and 8 of the Wildlife Act, thereby allowing their importation and providing for a licensing regime covering possession and release?

Q2. Should red squirrels be introduced to the Isle of Man?

Q3. If so, under what conditions?

In justifying a particular view please include as much detail as possible so that we can take this fully into consideration. Responses should be returned by 27th April 2016. Please note, they will be publicly available.

## 1. Background

- 1.1 There is continuing interest in the introduction of red squirrels to the Isle of Man. This is currently prohibited under the following legislation. The importation or keeping of red squirrels is prohibited, except under licence or special authorisation, under the Destructive Imported Animals Act 1963. Any licensed keeper may not turn them loose or wilfully/negligently allow them to escape. A change to the legislation would be necessary if a licence application for introduction were to be considered. The release of non-natives is also an offence under the Wildlife Act 1990, though there is a licensing provision. Your views are sought on such a change.
- 1.2 Any such change to the legislation assumes that an application may be forthcoming. There is private interest in taking such a project forward. We are therefore also seeking views on the merits or otherwise of such an introduction. A brief on the issues (Selman 2010) relating to the introduction of red squirrels, as assessed in 2010, is therefore available with this document, on the gov.im consultations web page to this consultation, in order to allow an informed debate. The views of specialists consulted in the 1990s, and an up to date assessment of habitat (Owen 2012) are also available for viewing at the DEFA headquarters in St. John's. Please ask at the reception to view them.
- 1.3 Some key points follow, in summary.

## 2. Native/non-native

- 2.1 There is no evidence of red squirrels having inhabited the IoM, though it is possible that they lived in woodlands here, pre-clearance (Neolithic). The red squirrel should therefore be treated as a non-native species. Under the Department's introduction policy, we normally require evidence that a species has lived here, but non-native introductions may be considered where they have a strong conservation element.

## 3. Conservation basis

- 3.1 The red squirrel has a vast distribution across Europe and Asia and is not itself endangered. To provide a conservation justification, interest should therefore be focused on the supposed British subspecies. As other subspecies have been introduced to the UK since the 19<sup>th</sup> century, the identification of uniquely British red squirrels is considered essential to any proposal for a conservation-based introduction to the Isle of Man and therefore genetic evidence would be appropriate.
- 3.2 A request from the UK government (under the UK Biodiversity Action Plan and UK Red Squirrel Group) for a refuge area on the IoM could be a central part of a justification, but UK refuge work (it is now a devolved matter) is concentrated on the native range in the UK and their guidance states that 'red squirrels should not be released onto islands where there are no historical records of their occurrence' (UKRSG 2004). The UK has red squirrel populations on islands and also designated mainland 'stronghold' areas, though there are concerns that some of these may be shrinking. Some other organisations remain interested in the possibility of a Manx squirrel refuge. There is clear precedence from New Zealand, which has moved critically endangered species to island refuges in order to prevent extinction due to introduced predators.

## 4. Issues and risks

4.1 The following issues and risks relating to sustainability have been identified that could affect the success of any red squirrel introduction project or affect other interests.

### 4.2 Economic issues

- Bark stripping and bud-feeding can occur in forestry. Forestry officers have stated that they would not see introduction as a significant issue for them. Food/mineral supplementation might help to deter bark stripping.
- The introduction may significantly contribute to a wider package of wildlife, heritage and landscape interest. However, there is currently good viewing at Formby Point, within reach of significant conurbations for a day-trip, which may limit our ability to compete for tourists from north-west England on the basis of this interest alone.
- Funding requirements. Funding is mainly expected to come from private or charitable sources. Interest has been shown from private/charitable sources. It is not a current conservation funding priority for DEFA, as these would be more aligned to the Biodiversity Strategy, however, acknowledging the wider visitor proposition, the economic development potential may enable some funding.

### 4.3 Social issues

- Nut harvesting is only undertaken on a non-commercial basis currently but could be affected in squirrel areas. This could be a potential economic matter if a business took an interest in nuts.
- Benefits may accrue regarding the public perception of wildlife and interaction with nature.
- Government involvement in funding and management may be contentious due to funding constraints and local conservation priorities.

### 4.4 Environmental issues

- Pesticides: risk of squirrels getting into grain-based rodenticide baits.
- Risk of initial founder population not being large enough.
- Food resources inadequate or too fragmented, or changing with forestry harvesting. Finding suitable sites with consistent food may be a challenge, therefore supplementary feeding may be required, even in the best potential sites. On an island, the risk of grey squirrel incursion is low, so a tree planting strategy for reds would be less restrictive.
- Squirrels are inadequately genetically screened, arguably undermining the conservation basis ('British stock' has been offered by Wildwood, Kent, though further details would be required).
- Other red squirrels subspecies are imported affecting the population genetics.

- Risk that grey squirrels arrive or are imported (a competitive and disease risk). They occasionally arrive on the Isle of Wight, presumably by ferry. One grey has been released on the IoM, now presumed dead.
- Any squirrel is imported with parapox virus.
- Bird nests can be predated in wooded areas, but this is considered minor.
- Unpredictable effects on an island ecology (there are no pine martens).
- Potential benefits to British red squirrel conservation if such genetic stock can be identified and made available.
- Risk of inability to recapture and remove squirrels if an issue occurred
- Effects on the source population via population reduction.

## 5. Licensing requirements

- 5.1 This is a licensing responsibility for DEFA, but there is interest in this from both conservation and economic (tourism) perspectives. A potential licence applicant should be clear regarding their reason for introduction, and how that relates to wildlife conservation on the IoM and elsewhere. Achievable project aims should be defined and the licensing criteria kept in mind, as a mainly income-based project would be unlikely to fit the accepted criteria.
- 5.2 The following are matters that are currently deemed appropriate considerations for licensing, but views are sought on the conditions appropriate for such a licence.
- A costed plan with a strong conservation argument and potential sources of funding (though noting that a funded source of stock has been suggested).
  - An assessment showing that an introduction is feasible and will lead to a long term, stable population, without unmanageable health or welfare issues, including consideration of habitat availability.
  - A translocation protocol (the UK has been developing one) including animal health provisions.
  - An impact assessment (environmental, social, economic).
  - A management plan which may include details of tree planting to provide suitable habitat in the long term, with landowner permission.
  - A monitoring plan and indicators of success.
  - Details of the source population providing evidence of a British lineage.
  - A contingency plan for recapture or control, if the project were not a success.
- 5.3 As a licensing matter the determining issues are likely to be the purpose of such a project and the source of stock, and the availability and quality of local habitat. The latter remains an issue according to Owen (2012), but he suggests supplementary feeding and reconsideration of tree planting (species) choices with squirrels in mind.
- 5.4 A major consideration in introductions is whether the benefits outweigh the problems, which from the conservation perspective, is likely to depend whether we could realistically aid the British subspecies.

## **6. Legislative change**

- 6.1.1 Two Orders would be required. An Order under the Destructive Imported Animals Act 1963 could remove red squirrels from the list of destructive animals, thereby removing importation, possession and release controls under that Act (replacing SD 233/94 Destructive Animals (Prohibition of Importation and Keeping) Order 1994).
- 6.1.2 A second Order would be needed to add the red squirrel to Schedules 5 and 8 of the Wildlife Act, thereby controlling possession and release by licence. In this way, the prohibition on releases and expectation of the control of any released animals, would be removed, but control of the situation would be maintained. This would prevent subsequent unauthorised possession and release, which could otherwise undermine the success of any licensed programme by later releases of diseased animals or stock of unknown origin.
- 6.1.3 Note, the importation and possession of red squirrels could be licensed under the current regime, but releases are prohibited.

## **7. Consultation questions**

- 7.1 This consultation asks the following questions:
- Q1. Do you agree with the removal of red squirrels from the Destructive Imported Animals Act 1963 and their addition to Schedules 5 and 8 of the Wildlife Act, thereby allowing their importation and providing for a licensing regime covering possession and release?
- Q2. Should red squirrels be introduced to the Isle of Man?
- Q3. If so, under what conditions?
- 7.2 Please include as much detail as possible in your answers so that we can fully understand your views.

## **8. Consultation period and responses**

- 8.1 Responses should be submitted by 27th April 2016. This provides the standard six week period for government consultations.
- 8.2 Please return your consultation responses to:

Red Squirrel Consultation  
Directorate of Forestry, Amenity & Lands  
Department of Environment, Food & Agriculture  
The Slieau Whallian  
Foxdale Road  
St John's  
Isle of Man IM4 3AS

- 8.3 Please note that a response does not guarantee a change to the proposals but we will consider all of the views received. Evidence can only be accepted from those willing to be named, in line with the Code of Practice on Consultation. Responses will normally be publicly available and the results will be published. Therefore respondents must clearly indicate if they wish their response to remain confidential and state the reason.

## 9. Further information

- 9.1 A digital version of this consultation is available from the consultation page of the gov.im website. If you do not have access to the internet, you can request paper copies by contacting the Department. If you have specific requirements regarding accessible consultation details (eg. large print), please contact Richard Selman to arrange for a suitable copy.

Directorate of Forestry, Amenity & Lands  
Department of Environment, Food & Agriculture  
Thie Slieau Whallian  
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- 9.2 Specific queries may be addressed to Dr Richard Selman, Senior Biodiversity Officer (Zoologist) at the address above.  
Email: [richard.selman@gov.im](mailto:richard.selman@gov.im)

## 10. Results of the consultation

- 10.1 A summary of responses will be posted on the Department's website within 6 weeks of the close of the consultation period and will also be available from the Tynwald Library and the Department's head office. Please note that the names of respondents may be included and the responses will be publicly available. Information provided in response will be dealt with in accordance with the freedom of information regime.
- 10.2 This consultation follows the Isle of Man Government Code of Practice on Consultation (June 2008). If you have any comments on how this consultation has been carried out, please contact Mr Richard Lole, Chief Executive of DEFA, at the Department's headquarters in St John's.

## 11. List of consultees

You are free to pass this notice to others who may be interested. If you are aware of someone who would wish to be notified and is not on the list, please send them the website link, or contact Richard Selman at DEFA. The following have been specifically notified of the consultation and a press release has been sent out.

- Tynwald Members

- Attorney General
- Local Authorities
- Chief Officers
- Chamber of Commerce
- Isle of Man Law Society
- Manx Wildlife Trust
- The Mammal Society
- The Manx National Farmers Union

## 12. References

Owen, HJF (2012). The Isle of Man: a possible future refuge for the British endangered Eurasian red squirrel (*Sciurus vulgaris*). BSc. Hons. dissertation, University of Plymouth.

Selman, RG (2010). Red squirrel introduction? – The issues, legislation and policy. Brief to the Forestry, Amenity & Lands Directorate Committee, Department of Environment, Food & Agriculture, Isle of Man Government.

UK Red Squirrel Group (2004). Release of red squirrels *Sciurus vulgaris* into the wild in Britain. Advice Note 1.2.



This document can be provided in large print or audio tape on request.

Front cover photos: Red squirrels at Formby Point, Lancashire (RGSelman).



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