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Llywodraeth Cymru
Welsh Government

Welsh Government
Consultation – summary of responses

Draft Grey Squirrel Management Action Plan for Wales

August 2018

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

1. INTRODUCTION

1.1 Purpose of the Consultation

The consultation, published on 20th November 2017 and closed on 21st February 2018, sought views on a draft grey squirrel management action plan for Wales.

Grey squirrel are a significant and widely spread invasive non-native species (INNS) in Wales, adversely affecting red squirrel populations, and woodlands and their associated benefits. Under Section 14 of the Wildlife and Countryside Act (1981) it is illegal to release grey squirrel into the wild or allow them to escape, even if taken into captivity for welfare reasons.

The Welsh Government's refreshed Woodlands for Wales Strategy (2018) continues the commitment to develop a strategic and targeted approach to help tackle threats from non-native invasive species, including grey squirrel. Additionally, Article 19 of the EU IAS Regulation¹ requires Member States to put in place effective and proportionate management measures for the eradication, control or containment of listed species. Grey squirrel are on the first Species of Union Concern list which came into force on 3rd August 2016.

The draft plan outlined known evidence of the impact of grey squirrel on biodiversity, woodlands and climate change. It proposed a strategic approach to managing grey squirrel populations, associated limitations and the management options – lethal and alternative - for doing so. It also set out draft actions that could be delivered through a partnership approach between the public, private and voluntary sectors to encourage and assist in grey squirrel population management.

It did **not** propose a pan-Wales cull or the eradication of grey squirrel from Wales. This was impractical and unaffordable owing to the population levels of grey squirrel.

1.2 Consultation Period and Distribution

The draft plan was produced jointly by Welsh Government (WG) and Natural Resources Wales (NRW) with input from a working group of stakeholders. The Welsh Government conducted a pre-consultation wider stakeholder workshop in July 2017. This enabled further input from a wider range of stakeholders into the development of the draft plan prior to this consultation.

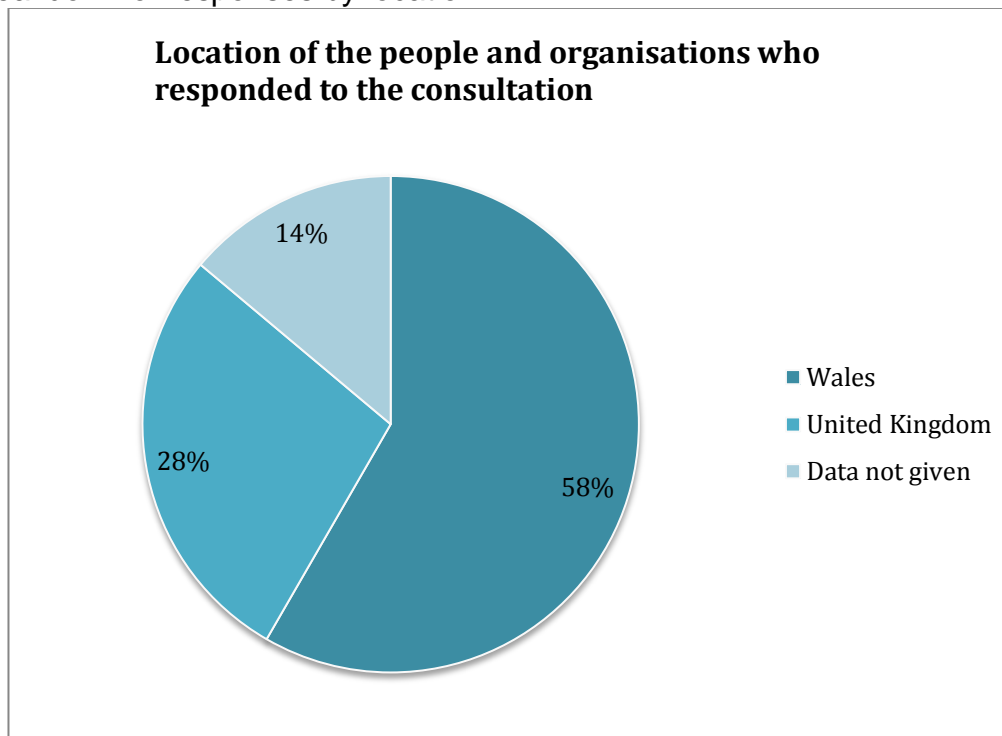
The 13 week public consultation on the draft grey squirrel management action plan opened on 20th November 2017. The consultation document and summary of the stakeholder workshop were available to the public on the Welsh Government's website, with invitations to respond sent by email to a wide range of stakeholders and interested bodies. Responses were received by on-line response form and via email.

¹ Article 19 of the EU Regulation 1143/2014 on the Prevention and Management of the Introduction and Spread of Invasive Alien Species (the IAS Regulation)

2.0 OVERVIEW OF RESPONSES

A total of 36 consultation responses were received. Of these, 58% were based in Wales, 28% from the wider UK, and around 14% did not indicate their location. No responses were received in the Welsh language.

Fig 1 - Breakdown of responses by location



69% of respondents replied by on-line response form.
31% of respondents replied by email via the Forestry policy mailbox.

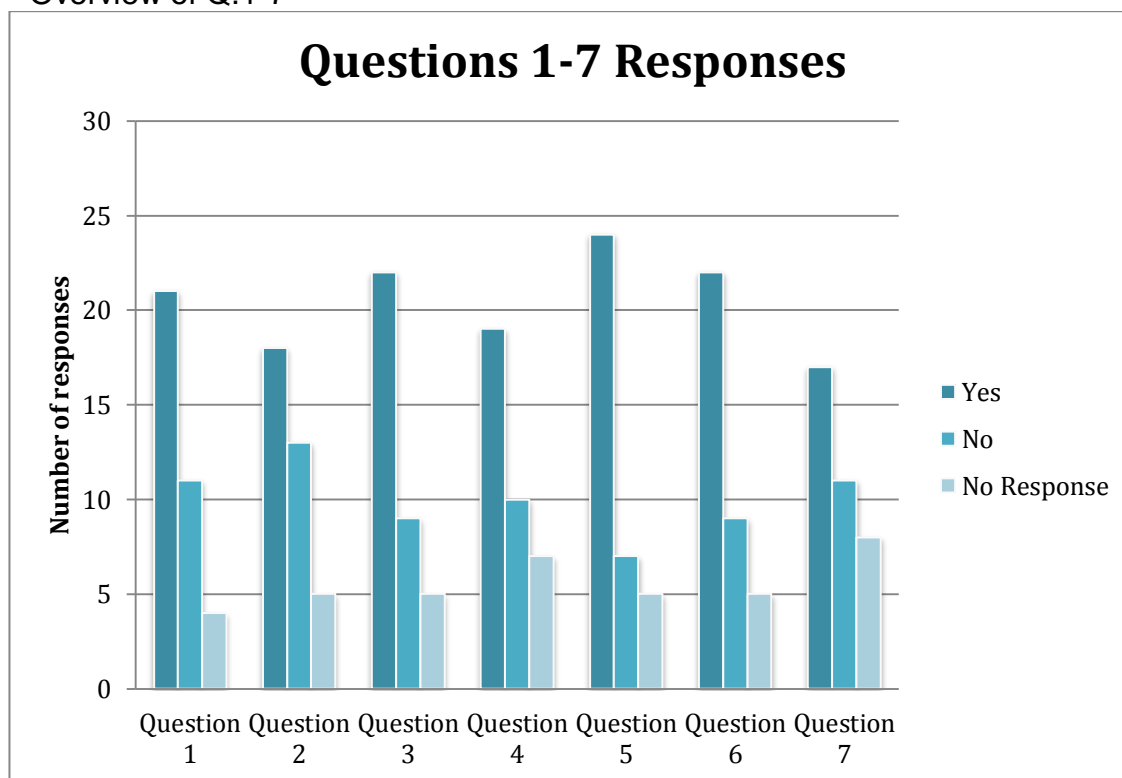
Table 1 – Breakdown of responses received by sector

Organisation	No. of Responses	% of total respondents
Forestry and Landowners	4	11
Red Squirrel Conservation	4	11
Animal Welfare	4	11
Public Bodies, Local Authorities and Academia	3	8
Shooting Interest	2	6
Individual	19	53
Total	36	100

The responses were allocated to a sector type according to their organisation where this information was provided. Table 1 indicates the breakdown of responses by sector. Of these, 53% of respondents did not provide this information and are recorded as individuals, although these respondents could be relevant to any of the sectors listed.

The consultation posed 10 questions in total. Seven questions asked for a yes/ no answer with reasoning for the response given, as illustrated at Fig 2 below.

Fig 2 – Overview of Q.1-7



2.1 – Summary of key points

Of the responses received, the main points appear to be:-

- The majority of respondents support the plan and the proposed actions. There is also support for an adapted Wales Squirrel Forum to act as a steering group to co-ordinate the delivery of the plan.
- Opposition to the plan, while in the minority, focused on opposing any management of grey squirrel populations particularly where this involved lethal methods. There were calls to provide funding for more research into non-lethal methods of control.
- There was support for the categories outlined for prioritisation for action, particularly the protection of red squirrel. However it was noted that the combined categories amounted to a large proportion of the woodlands in Wales.

- A collaborative approach to grey squirrel management at a landscape scale was supported, but financial assistance would be needed. Financial assistance was more effective when deployed on a collaborative basis.
- There was strong support for training in best practice, to ensure that methods employed in grey squirrel management were humane.

3.0 ANALYSIS OF RESPONSES

Question 1 – Owing to limited resources, action for managing grey squirrel populations needs to be targeted. The categories stated at p.17 of the consultation document are not in order of priority as this will depend on the objectives of landowners and local groups. However, flagging these for targeting helps recognize the importance of these categories and could form the basis of further targeting in future.

Do you agree with these categories? Please give a reason for your response.

Question 1 Breakdown	Number	%
Yes	21	58%
No	11	31%
No Response	4	11%
Total	36	100

58% of respondents agreed with the categories put forward for prioritisation, and that a strategic and targeted approach was needed. The categories also provided a framework for potential funders to assess projects, releasing funds for higher priority areas. There was support particularly for protecting red squirrel populations in Wales, although concerns were raised that measures should not prevent Plantations on Ancient Woodland Sites (PAWS) restoration or affect the balance between native and non-native trees in red squirrel focal areas. One respondent flagged that the bracketed text of the timber production category implied that grey squirrel populations would be maintained in other features. The intention was that this category should include other features that *harbour* grey squirrel populations. The text within the diagram will be altered to make this clear.

However there was some concern that the combined categories encompassed a large amount of the woodland resource. The broader categories such as Ancient semi-natural woodland and vulnerable commercial woods were widespread making them harder to defend against grey squirrel damage. NRW flagged that a review every 5 years, identifying actions taken, funding requirements, roles and responsibilities going forward, and an assessment of affordability against benefits would help in assessing the success of these priorities.

31% disagreed with the categories listed for a range of reasons. One respondent felt that the categories did not include prevention of grey squirrel spreading into areas where grey squirrel had been eradicated, and therefore only partially met the obligations under the Invasive Alien Species (IAS) Regulation. Another respondent felt that total eradication of grey squirrel must be the goal, rather than a targeted approach.

The remainder of respondents who disagreed did so because they were fundamentally opposed to culling grey squirrels. Animal Aid provided a supplementary paper strongly

setting out that they felt the case against grey squirrels was not based on sound science, economics or humaneness. This was reflected in comments from 6 other respondents.

RSPCA raised concerns about how the management action plan might be implemented, making the point that any management programme needed clear objectives and a well defined end point agreed at the start, to avoid control continuing indefinitely.

Welsh Government View

We welcome the support for the categories listed for targeting grey squirrel management and acknowledge that these are fairly broad. These reflect the impact of grey squirrels on a range of woodland habitats, and are relevant to the objectives of the plan. The decision to manage grey squirrel populations rests with the owner and will depend on the objectives for the woodland concerned. However the breadth of categories should enable collaborative action across a number of priorities in a given area. These can be re-assessed when the action plan is reviewed after 5 years.

Articles 16 and 17 of the Invasive Alien Species Regulation (IAS Regulation) relates to the early detection and eradication of species of Union Concern that are new or previously eradicated in a Member State. Grey squirrel are well established and widely spread in Wales, and are covered by Article 19 of the Regulation. This requires Member States to put in place effective and proportionate management actions aimed at the eradication, control or containment of listed species. We consider that this management action plan helps deliver this requirement in Wales.

The management action plan drew on a range of research and information sources as referenced in the consultation document, setting out known evidence of the impact of grey squirrels on the environment. This informed the development of the plan in order to meet the obligations of the IAS Regulation and the commitment within the Woodlands for Wales Strategy.

Question 2 - A “vulnerability map” of wooded areas in Wales could be developed to help indicate where a collaborative approach to grey squirrel management could be focused. Do you feel that this tool would assist in a collaborative and targeted approach to grey squirrel management? Please provide details of any other targeted approaches.

Question 2 - Breakdown	Number	%
Yes	18	50
No	13	36
No Response	5	14
Total	36	100

50% of respondents supported the idea of a map showing vulnerable woods. This was seen as a useful tool to identify where collaborative management on a larger, landscape scale could be focused, reducing the risk of perturbation where young squirrels move in to replace those lost.

Respondents acknowledged that, if made publically available, the map could communicate and motivate landowners into action, particularly in relation to mature woods which acted as grey squirrel reservoirs. Some respondents highlighted the need to develop the map alongside other “layers” highlighted within the priority categories, such as red squirrel focal

areas, designated sites and PAWS. This would flag other relevant factors or constraints when developing potential projects and would provide funders with an indication of priority in the national context.

However concerns were raised that the map was likely to identify large areas of high risk woodland in excess of resources available to support landscape scale initiatives. One respondent flagged the potential to remove the lowest priority areas. A number of respondents raised concerns that areas or pioneering groups willing to collaborate that did not occur in high risk/ high priority areas may be potentially excluded from financial support. NRW also flagged that the map should not dissuade groups from working elsewhere if collaboration was possible.

Of the 31% who disagreed, one respondent raised concerns that a vulnerability map would only focus on species and age of trees, where squirrel damage was more complex. RSPCA flagged that the need for such a map would depend on the end objectives of the project, which could be difficult given the long term nature of grey squirrel management. Others felt that the map was irrelevant as all broadleaved woodlands were now vulnerable or that eradication of grey squirrel was essential.

A number of respondents who disagreed reiterated that they were opposed to culling grey squirrels and felt that the vulnerability map proposals were driven by vested interests rather than scientific research. Concerns were also raised about the cost and resources in developing the map and keeping it up to date.

Welsh Government View

We welcome the support for a vulnerability map and the suggestions for including additional layers to make it more informative. We also acknowledge the concerns regarding its use. The aim of the map would be to indicate clusters of vulnerable woods where collaborative action could be targeted. However this should not prevent a group with common objectives from working collaboratively elsewhere. This will be made clear in the action plan.

Question 3 - Draft actions 3) and 4) relate to support and incentives in future grant schemes with a focus on collaborative working. Do you agree that support, if available, should focus on a strategic and collaborative approach to grey squirrel population management? Please explain your answer.

Question 3 - Breakdown	Number	%
Yes	22	61
No	9	25
No Response	5	14
Total	36	100

Those who agreed felt that a collaborative approach at a landscape scale was necessary to be effective and should involve all stakeholders (private and public) including the wider community, in order to reduce influx of grey squirrels from elsewhere. A number of respondents also felt that financial assistance would be required to support a collaborative approach and would be used more effectively than on an individual basis.

The Welsh Wildlife Trusts highlighted that the benefits from managing grey squirrel over the years in key areas such as red squirrel focal areas faced being lost owing to the funding gap caused by a lack of Glastir Woodland Management support, and called for this to be addressed as a priority.

Respondents provided a number of suggestions to be included in the design of a future natural resource management scheme:-

- Future land management support should be based on a public money for public goods argument, such as providing a level of support to set up and maintain a collaborative approach to deliver a public good e.g. timber production or red squirrel protection.
- Future grant schemes supporting grey squirrel control for timber production should require a commitment to manage the woodland to the final crop to ensure high quality timber is achieved.
- Project officers should be funded to facilitate collaborative actions.
- A mechanism was needed to enable co-ordinated action across a collaborative area, such as being able to employ individuals to undertake greys squirrel control on behalf of a group, rather than individual landowners contracting and evidencing control.
- Support schemes could provide practical or financial support, as well as equipment sharing and training, as incentives for landowner participation.
- Individual sites that may not qualify for funding could still benefit from non-financial support such as advice and guidance.
- Single landowner initiatives that otherwise meet the necessary tests should not be excluded from support e.g. large estates can make a significant impact in an area.
- A legislative approach is needed to enforce grey squirrel control in instances where collaborative initiatives are undermined by non-compliance of individual woodland owners.
- An assessment of effectiveness of projects is required, alongside the ability of funders to reallocate money elsewhere if necessary.

Those who disagreed felt strongly that culling of grey squirrels were a waste of money, as there was little evidence that previous culls had worked. A number of respondents felt that resources should be spend on non-lethal management methods such as oral contraception and woodland management methods to make woods less attractive to grey squirrel. Four respondents suggested that landowners should be paid compensation for proven squirrel damage, rather than to kill grey squirrels. One respondent flagged that any publically funded program supporting control needed to address the popularity of grey squirrels if a public backlash was to be avoided.

Welsh Government View

We welcome the support for collaborative working. We note the points raised regards financial support being more effective on a group/collaboration basis and will reflect this in the action plan. We will also consider the range of suggestions provided by respondents in the design of a future natural resource management scheme.

We feel that the payment of compensation to landowners for squirrel damage would act as a disincentive to undertake grey squirrel population management, leading to a rise in grey squirrel numbers and a cycle of increasing damage to woodland habitats. Research into non-lethal methods of grey squirrel management such as the development of immune-contraception is on-going at a UK level.

Question 4 - Owing to limited resources, it is not possible or feasible to manage grey squirrel on every part of the Welsh Government Woodland Estate. Draft action 5) relates to work that NRW could undertake when resources allow. Do you agree that this should be focused where it is feasible to do so and there is a partnership approach with other woodland owners? Please detail below any other considerations or limitations for identifying areas for action.

Question 4 - Breakdown	Number	%
Yes	19	53
No	10	28
No Response	7	19
Total	36	100

In general there was support for this proposal. A partnership approach to management of grey squirrel populations was supported, with red squirrel focal areas seen as a priority. One respondent flagged the need to extend this proposal to include local community engagement particularly around urban areas. The proposal was seen as an opportunity to share costs and best practice, and use local skills and knowledge.

Some respondents added that this should not prohibit NRW action to manage grey squirrel solely within its own woods independently of adjoining landowner participation. One respondent asked for flexibility for NRW funding of grey squirrel management to extend to private woodland where there would be a benefit to the WGWE.

NRW reiterated its commitment to prioritise grey squirrel management to protect red squirrel focal areas in a partnership approach, but added that additional areas would require a cost-benefit analysis and would not be possible without additional resource.

BASC disagreed with the proposal, outlining that it limited the scope of grey squirrel management on the WGWE. They highlighted the potential to use volunteers to undertake grey squirrel management to reduce NRW costs. Another respondent felt that more resource should be secured to achieve total eradication.

The remainder of those who disagreed felt that any cull was cruel and ineffective, and that funding should be spent on alternative forms of control or compensation to landowners for proven damage. RSPCA reiterated that clear goals and a well defined end point were needed alongside the need for sensitivity where management was undertaken in public access areas.

Welsh Government View

As outlined in the consultation document, WG are aware of the limited resources available to manage the WGWE and acknowledge that grey squirrel management across the whole WGWE is not possible. Undertaking grey squirrel management on the WGWE as part of a partnership approach at a landscape scale level should be considered where feasible.

Question 5 - Draft action 8) relates to working collaboratively to improve action on the ground. Do you agree? How could this be achieved?

Question 5 - Breakdown	Number	%
Yes	24	67
No	7	19
No Response	5	14
Total	36	100

There was general support for this proposal which focused on working collaboratively to improve the delivery of actions in both the Red Squirrel Conservation Plan and the proposed Greys Squirrel Management Action Plan in Wales.

A number of respondents made suggestions on how this could be achieved, which included multiple support for:-

- A project officer approach to facilitate cooperation and communication between those involved, and identify and tackle critical gaps in grey squirrel management. This could be provided by a range of organisations.
- Grant support to support project officer work, collaboration and voluntary groups involved in grey squirrel management.
- The Wales Squirrel Forum (WSF) was flagged as a useful platform to share best practice.

Other suggestions included:-

- Funding mechanisms should recognise that a voluntary group is already a collaboration of different entities. These are often viewed as a single “partner” within bidding processes with emphasis on more “partner” organisations regardless of impact on the project.
- An effective engagement process needed to achieve wider collaboration through an awareness raising programme to highlight opportunities and benefits of collaborative working to landowners and managers.
- Networking of red squirrel conservation groups
- Targeted promotion of grant funded grey squirrel management options.
- Strong policy lead to ensure future funding encourages collaborative working.
- Use existing partnerships as models for new partnerships in grey squirrel management.
- Engage all stakeholders and volunteers
- Engage with organisations that have an alternative approach.

Those who disagreed did so mainly on the basis of the cost of killing grey squirrels outweighing the benefits, and not being cost effective or sustainable. One respondent flagged the need for management projects to have clear objectives agreed by stakeholders at the outset.

Welsh Government View

Given the objectives of both plans, there is inevitable overlap between the Red Squirrel Conservation Plan and the Grey Squirrel Management Action Plan. The support shown by respondents for collaborative working, not only between those organisations involved in managing grey squirrel populations but also to engage wider landowners, is welcome. Collaborative working should also help to share the costs of actions and make best use of available resources. The suggestions on what is needed to make collaborative working

happen will be useful to inform the design of future support mechanisms as well as future bids for funding.

Question 6 - Draft action 10) relates to promoting best practice and training, and highlighting the need for risk assessment of damage. Do you agree that these actions are necessary to encourage grey squirrel management? How could this be done effectively?

Question 6 - Breakdown	Number	%
Yes	22	61
No	9	25
No Response	5	14
Total	36	100

The majority of respondents agreed with this question. There was strong support for access to training on best practice in grey squirrel management techniques and humane dispatch, as well as access to on-going support. Promoting best practice and training was also seen as critical to building and maintaining public support. One respondent outlined that while the Wales Squirrel Forum could act as a contact point, there were a number of initiatives such as Farming Connect that could contribute to this.

Training needed to be undertaken by experienced operators. One respondent outlined that requiring a specific standard or training course would provide a framework for individuals already involved to ensure best practice was used. Another respondent indicated that training should be made available in targeted areas where collaborative work is likely or underway. However a different respondent felt that investment in the co-ordination of training was needed to initiate improved grey squirrel management across a wider range of sectors and stakeholders.

Risk assessment of damage was seen as important to inform whether or not grey squirrel management was necessary, although presence within a red squirrel area would be sufficient to warrant action. The damage assessment would act as evidence to promote action and to assess the effectiveness of grey squirrel management. The point was made that damage assessments needed to be effective but not onerous as this would discourage participation by woodland owners. One respondent highlighted that the Forest Research Practice Note on risk assessment was too complex for small woodlands, and reference was made to “The Grey Squirrel Management Handbook” published by the European Squirrel Initiative, which set out a more practical approach.

Those who disagreed felt that all killing of grey squirrels should stop as it was inhumane and not cost effective. A number outlined that the focus should be on humane deterrants such as planting less susceptible trees, providing calcium supplements and the development of oral contraception. Where killing was likely to continue, Animal Aid called for a focus on humanness which included a ban on killing squirrels in the breeding season; volunteers should not be permitted to shoot live animals and an end to the use of spring traps. Some respondents felt that providing training for the management of grey squirrel would encourage individuals who enjoyed killing; others that the timber industry was using grey squirrel management as a route to obtaining public funding.

Welsh Government View

We welcome the support for this action and the suggestions highlighted. These will be considered in the implementation of the plan. Research into non-lethal methods of

management such as oral contraception and grey squirrel behaviour to identify other potential deterrents is on-going as outlined in the consultation document.

Question 7 - It is proposed that the Wales Squirrel Forum could be adapted to provide a steering group for the delivery of the plan and avoid duplication of effort. Do you agree that an adapted Wales Squirrel Forum would be the most appropriate steering group to assist in the delivery of this plan? Please give reasons for your response.

Question 7 - Breakdown	Number	%
Yes	17	47
No	11	31
No Response	8	22
Total	36	100

In general the response was positive, with those in support highlighting the benefits of the experience and expertise of individuals representing most of the organisations already engaged in red squirrel conservation or grey squirrel control. However there was recognition that the membership would need to be expanded to cover the additional objectives of the Grey Squirrel Management Action Plan. There were two opposing views on chairmanship; one stating that this should be independent of organisations receiving public funds, hence WG or NRW; the other stating that the Forum should remain independent of government.

NRW raised the point that the Forum did not have any resource or constituted remit, hence their role must be a co-ordinating one rather than having responsibility for ensuring delivery of the plan's objectives. Another respondent highlighted the limited availability and duration of funding for grey squirrel management as a major barrier and only limited gain could be achieved by more co-ordinated effort. A strategic approach to communication and public engagement was important and flagged as something the Forum could develop.

Comments from those who opposed the proposal included that NRW should take the lead; that the diversity of interests in the Forum would dissipate effort; and that this should be delivered on a UK wide basis rather than from within Wales.

The majority of those who opposed the proposal felt that grey squirrel management was a black hole for public money which should not be used to kill grey squirrels, and that the Forum should focus on more humane deterrents.

Welsh Government View

We welcome the support for the proposal that an adapted Wales Squirrel Forum acts as the steering group to co-ordinate, support and provide advice on the delivery of the grey squirrel management action plan.

Question 8 - As accurate baseline monitoring data for grey squirrel populations and associated damage is not available, the plan proposes 3 monitoring methods. We are interested in hearing about other existing or potential monitoring methods that have not been referenced in the consultation document. What are these and what is involved?

In the main, there was agreement that the 3 monitoring methods listed were seen as appropriate in the absence of anything more robust. One respondent highlighted the need

for robust methods of estimating grey squirrel populations in order to set objectives for action, but acknowledged that it was difficult, particularly in low density areas. Another respondent felt the proposed monitoring methods were not a robust approach, but that it was difficult to assess the impact of action taken, owing to natural fluctuations in population.

Suggestions for other monitoring options included

- A damage assessment programme, either based on NFI (National Forest Inventory) data or developed for recording by the public/landowners. The practical methodology developed in the “Grey Squirrel Management Handbook” was seen as an option for this.
- Assessment of local action through recording data on grey squirrels trapped, particularly where grant support is provided.
- Some research may be needed to further develop monitoring options.
- Humane control methods should be monitored instead.

A number of respondents felt strongly that the lack of baseline data for monitoring was an indication of lack of an evidence-based approach to management, that previous culls had been ineffective and any culling should be immediately stopped.

Welsh Government View

We welcome the support for the three methods outlined in the consultation document for monitoring the progress of the action plan. The suggestions made will be useful in informing project effectiveness at a local level.

Question 9 - We would like to know your views on the effects that the draft grey squirrel management action plan would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

Please also explain how you believe the draft grey squirrel management action plan could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

A number of suggestions were made in relation to the Welsh language, including bilingually producing the action plan and any documents/training arising from it, supporting local partnerships through providing training and mentoring in Welsh, and producing the action plan with running text in Welsh first, rather than separate English and Welsh versions. One suggestion outlined that a layman’s version of the action plan produced bilingually would be helpful to communities.

Others felt that the action plan should focus on red squirrel conservation and improving habitat loss as a positive Welsh message, rather than grey squirrel management which would lead to negative publicity for Wales particularly with tourists. A number of respondents did not feel that the Welsh language was relevant to the action plan.

Welsh Government View

We thank the respondents for their suggestions and will consider these in the course of the publication and delivery of the management action plan.

Question 10 - The draft plan sets out the context for a grey squirrel management action plan for Wales, and actions that we feel are necessary and realistic in delivering action on the ground.

Are there any actions that you feel are unnecessary or have been missed?

Are there any other comments that you would like to make?

A number of respondents were in general support of the plan with one respondent outlining that the agreement of the action plan would help focus discussion on approaches and raise awareness across a wider range of stakeholders. Others reiterated their strong opposition to the culling of grey squirrels and the apparent waste of public funds associated with it.

Specific comments by individuals included:-

- A communication strategy is needed to ensure action, covering education and information for the general public on why grey squirrel management is necessary, with clear, widely publicised explanations. However demonising the species causes welfare issues where people take matters into their own hands. Wales Squirrel Forum could develop an information sheet based on research and evidence as part of this.
- In line with Directives, a key aim of the plan should be “To prevent, detect and remove grey squirrel incursion onto the island of Anglesey in order to prevent establishment and re-colonisation of this grey free landscape.” It was felt that this was needed to address the prevention and detection of incursion requirements of the Directive.
- The strategy needs to be more objective in its approach, based on real research and consider the benefits of grey squirrel such as invertebrate habitat in deadwood, public enjoyment and a sustainable free-range food source for restaurants.
- Financial commitment by Government is needed to provide grant support for grey squirrel management materials as part of a geographically strategic and collaborative approach. Other trap supply initiatives have shown this type of support to be effective.
- More emphasis should be placed on the assessment of woodland management practices that exacerbate grey squirrel problems. Promotion of mixed species stands with a reduced proportion of vulnerable species should be pursued.
- Cessation of the use of feeders in red squirrel areas would reduce cross infection of squirrel pox.
- Further funding is needed for research into the development of methods of management such as immuno-contraception, and understanding the effect of pine martins on grey squirrel.
- Make use of the skills and knowledge of land managers already involved in grey squirrel management and consider the contribution of the shooting community as insured, competent shooters.
- Private landowners should be allowed to extend grey squirrel management into WGWE where it bounds with their land.
- Clear objectives are needed at the start of any targeted management program to agree what success and failure looks like.
- Public opinion is against culling, with a likely negative effect on tourism and the image of Wales.

Welsh Government View

We thank the respondents for their comments outlined above. A number are practically based and will help to inform the implementation of the plan. We recognise the importance of a communication strategy which is likely to form part of Actions 9 and 10, although is

relevant to the wider action plan. As outlined at Question 1, grey squirrel are wide spread in Wales and are covered by Article 19 of the Regulation, which requires effective and proportionate management measures to be put in place. We consider that this management action plan which includes targeting efforts in red squirrel focal areas and buffer zones will help to deliver this requirement in Wales.

The consultation document was based on a range of research as referenced within the document. Research into non-lethal methods of population management such as immune-contraception is on-going. Provision of training in best practice will help ensure those considering grey squirrel management do so using humane and legal methods. Grey squirrels are widespread in Wales and as stated in the objectives of the action plan, there are no proposals for a pan-Wales cull or eradication program.

4.0 NEXT STEPS

The Welsh Government would like to thank all the respondents for taking the time to respond to the consultation. All comments have been carefully considered and where indicated above, will either be reflected in the final action plan, will service to inform its implementation or will be useful in the design and development of a future natural resource management scheme. The next steps are:-

- The action plan will be finalised and published.
- We will work with members of the Wales Squirrel Forum to examine how this can be adapted to provide a steering group to co-ordinate the implementation of the plan.

Annex A: Summary of respondents who did not choose anonymity:-

Name	Organisation
Dr Craig Shuttleworth	Bangor University
Becky Hulme	Wildlife Trust of South and West Wales & The Mid Wales Red Squirrel Partnership
Alexander J McSkimming	Individual / Organisation not stated
Merryll Hills	Volunteer Mid Wales Red Squirrel partnership
David Matthews	UK and Eire The Grey Area
Alan Bateman	Individual / Organisation not stated
Nick Morris	Individual / Organisation not stated
Ian Danby	The British Association for Shooting and Conservation
Natalia Doran	Urban Squirrels
Rachel Barrat	London Wildlife Protection
Jade Emery	Animal Aid
Lizzie Wilberforce	On behalf of the Welsh Wildlife Trusts (Wildlife Trust of South & West Wales, North Wales Wildlife Trust, Montgomeryshire Wildlife Trust, Radnorshire Wildlife Trust, Brecknock Wildlife Trust, Gwent Wildlife Trust, & Wildlife Trusts Wales)
Clare Lawson	RSPCA Cymru
Philip Davies	Bodnant Estate
Ceri Davies, Executive Director	Natural Resources Wales
Frances Winder	Woodland Trust
Chris Hugh	Mwmac Ltd
Dafydd Roberts	Snowdonia National Park Authority
Rachel Evans	Countryside Alliance