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Mr Jack Sargeant MS
Chair - Petitions Committee
Senedd Cymru
Cardiff Bay
Cardiff
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Date 24/5/23

Dear Mr Sargeant,

P-06-1333: Petitioner's Submission - Petitions Committee Meeting 5/6/23

My petition collected 3625 signatures between 1/4/23 to 11/5/23. It sadly follows P-06-1208 in calling for the Senedd to intervene with regard to Natural Resources Wales (NRW) and red squirrel conservation efforts in NW Wales.

Petition P-06-1333 was launched because NRW failed to tell us about habitat felling to occur this year in Gwynedd. We discovered it from a third party. No felling is timetabled within online public plans which clearly indicate the earliest activity for winter 2024/25. Once again, no red squirrel survey had been undertaken to assess population impacts of habitat loss. This scenario mirrors what we experienced historically on Anglesey, including the felling that resulted in P-06-1208 being launched in early 2021.

Thank you for sending me the letter dated 17th May 2023 you received from Julie James, Minister for Climate Change (Ref: JJ/01084/23). I would like to respond by first addressing P-06-1208 and Anglesey red squirrel habitat monitoring which she mentions, before then addressing specific points made relating to Gwynedd red squirrels.

Senedd and Ministerial Response to P-06-1208

It was clear in December 2021 that there was strong cross party support for red squirrel conservation and several AMs referred to the need for NRW to work better with local conservation groups. Following the debate, Rhun ap Iorwerth AM organised a meeting between Red Squirrels Trust Wales and NRW NW Area Team to overcome the fracture in relations. Significant assurances were made by NRW that they would learn lessons to work with those shouldering almost all of the weight of red squirrel conservation delivery in NW Wales. We attended subsequent '*liaison meetings*' meetings in good faith.

Red squirrel monitoring report: Anglesey

The Minister refers to red squirrel monitoring undertaken on Anglesey [in 2022].

We should not forget that until 2022, NRW had done **no monitoring of red squirrels anywhere in Anglesey**, despite this location defined as a 'known focal site' for the species.

NRW had also **'lost' or not recorded tree planting data** and could not say whether young trees on the Anglesey national forest estate were dead or alive yet NRW alluded to them being future squirrel habitat. They had continually clear-felled red squirrel habitat in the focal site with **no attempted to understand the immediate or forecasted long-term impact on population dynamics**.

In 2021, Bangor University were awarded a contract to design a red squirrel monitoring method for NRW. I undertook the research with two colleagues in 2022. The report has formed the basis of a scientific paper submitted to the journal **'Ecology & Evolution'**.

The research revealed that timber harvesting has led to significant declines in red squirrel numbers in Newborough forest. A lack of adequate under-planting and a reliance on natural regeneration is also changing the forest in a way that will lead to declining food resources for the squirrels. We presented earlier research demonstrating that habitat structure is likely to elevate red squirrel predation and habitat fragmentation leading to elevated energetic expenditure when animals search for food which may reduce breeding rates.

The Minister states, *'Red squirrel management is integrated into NRW's commercial forestry management, reflected in the notable increase in red squirrel population on Anglesey.'* The recovery of red squirrel actually relates to grey removal and the management of habitat across Anglesey. Population increase *per se* from a 1998 near extinction level is in itself, unsurprising and to partition the impact of NRW forest management as a contributory fact needs data. The only available data are the 2022 Bangor University survey. These show worrying comparative population decline as a result of tree felling in state forest.

Forest Management: Anglesey 2023

Recent Freedom of Information requests suggest that NRW have not implemented any management to recreate arboreal canopy connection between fragmented forest blocks. For example, request for 'Method statements' met with an unsatisfactory and woolly reply which the NRW data officer is dealing with.

There has been no tree planting in 2020/21 or 21/22 and the agency was again unable to say how many earlier planted trees were still alive.

In May, a senior NRW manager stated in correspondence with a member of the public that the red squirrels on Anglesey are *'predominantly in NRW managed forest'*. The member of the public wrote back asking for the supporting data. To date, she has received no data despite the surety of NRW comment strongly suggesting they must have had the requested data at their fingertips. I believe the statement is erroneous.

Gwynedd red squirrels: Wales Red Squirrel Plan (2018) states survey of non-focal populations

In 2005, there were twenty 10x10km² squares in Wales with red squirrels. In 2008-2017, this had increased to 32. Four of the new squares were in Gwynedd where previously there had been no red squirrels. Anglesey had increased from 4 to 12 squares. Without these geographical increases the number of occupied squares would have flat-lined at 20.

Grey squirrel control and red squirrel conservation in Gwynedd was funded 2015-2020 via EU LIFE14 NAT/UK/000467 and in 2022-2027 will be through National Lottery Heritage Fund funded 'Magical Mammals' project. Over £600K of funding raised by volunteer groups since 2015 during which time £0 has been contributed by NRW North West. The Gwynedd red squirrel conservation is underpinned by significant private sector resource.

I have perhaps laboured the fact that even in the key Anglesey 'focal area', NRW simply failed to monitor red squirrels until P-06-1208. This is important context as the Minister now states that NRW bizarrely *'don't carry out red squirrel monitoring outside of known focal areas'* even though the national plan indicates they must:

- **The Wales red Squirrel Conservation Plan (2018) p12 Action 8 'Refreshed Red Squirrel Conservation Actions'** states **'Survey non-focal sites where reliable records of red squirrels received'**...
- Page 19 Action 3 'Protect Red Squirrel Populations' states **'Conservation action to protect red squirrels on mainland sites needs to focus on ensuring suitable habitat is present to support viable red squirrel populations'**
- This national strategic commitment clearly covers survey of Gwynedd squirrels even though they are not in a focal area!

If the Welsh Government is serious about reversing biodiversity decline they need to 'encourage' NRW to adhere to the 2018 red squirrel conservation plan. After all, NRW are the forest licensing authority in charge of private sector tree felling licences which soon will often see them impose conditions on others to enhance or protect biodiversity. As a regulator they should be leading on the reversal of the biodiversity crisis.

Parc y Bwlch

In 2020/21 there was a massive squirrelpox outbreak in Gwynedd which devastated red squirrels. One of the few places now containing red squirrel is Parc y Bwlch. The forest plan does not adequately consider this species – remember NRW haven't even surveyed and have no idea where the animals are or how many are there.

The Minister states that, *'At the time of the consultation in 2021, there weren't any reports of red squirrel sightings at Parc y Bwlch, but these have increased over the past few months. NRW are encouraging sightings to be recorded through the UK Squirrel Accord.'* If I may clarify:

- If NRW had spoken to us when they first planned to bring forward clear-felling-to this winter, we would have told them that red squirrels were recorded before 2021 (as reported in EU LIFE14 NAT/UK/000467, later in 2021 and every year since.

- This Welsh project partnership ‘Magical Mammals’ is the correct place for sightings to be reported. If, as the Minister writes, NRW want data to go to Accord UK, perhaps they should explain why they never mentioned this during the three years of development of the Welsh ‘Magical Mammals’ National Lottery Heritage Fund funded initiative? It smacks of an attempt to avoid us being the main holder of data.

Clocaenog (North East NRW) vs Gwynedd (North West NRW)

I was contracted by NRW in 2020 to review red squirrel conservation in Clocaenog forest focal area having been supporting the agency there since 2012 in various professional capacities. I also managed the eradication of grey squirrel from Anglesey and every red squirrel project in Gwynedd/Anglesey since.

I am therefore well placed to comment on the differences between the two regional teams.

In NE Wales, NRW monitor throughout the Clocaenog forest holding and have done since 2012. The agency seeks recommendations and transparently selects which elements they will adopt. The forest management is defined and restocking is monitored. It is fair to say that red squirrel numbers are extremely low and habitat at key hotspots is managed very carefully. Note: **Clocaenog had x2 10x10km² occupied by red squirrels** in 2008-2017 survey.

In the Anglesey focal site, NRW NW did no population monitoring until my petition forced them too, the forest management often lacks even the most fundamental data e.g. tree planting survival and now, after a massive Gwynedd pox outbreak, the agency plans to clearfell without any population monitoring, habitat where some of the last red squirrels are found. Note: **Anglesey /Gwynedd had x16 10x10km² occupied by red squirrels** in 2008-2017 survey.

Concluding points

The 2022 United Nationsⁱⁱ report highlights how the failure to manage forest habitat for species is a major global driver in biodiversity decline often because of a lack of resource, planning, survey, managerial capacity **and crucially ignoring ‘non priority’ habitat areas**. The authors didn’t just conjure up their findings, they relied on peer reviewed science and scrutinised data. Why is a Welsh Government agency ignoring this especially when the 2018 Conservation Plan indicates they should survey red squirrel sites beyond focal areas?

In NW Wales volunteers and communities are the engine driving forward red squirrel conservation. They raised the majority of the regional conservation funding, they monitor for pathogenic disease, they control grey squirrels, they encourage landowners to manage for red squirrels; they regularly sign petitions on red squirrel matters.

The £2.8 million red squirrels united project EU LIFE14 NAT/UK/000467 ⁱⁱⁱ cost/benefit analysis estimated that during four years, 189,000 people came to Anglesey/Gwynedd to see red squirrels and contributed **£10million to the local economy**.

NRW NW stance of ‘not monitoring’ not only contradicts the commitments in the Wales Red Squirrel Plan 2018 but undermines local volunteer efforts, ‘well-being’ and the economic value of the species.

The Minister stated *‘[Dr Shuttleworth] informed NRW that he disagreed with the Forest Resource Plan and that felling should not take place despite Parc y Bwlch not being part of a red squirrel focal site.’* Let me be clear, I never said no tree felling *per se*, nor did Red Squirrels Trust Wales. Instead, after we found out about felling via third parties, we asked for a **delay to felling to winter 2024/5 as was originally timetabled**, and a reduction in the felling area by half and better integration of red squirrel needs in plans by surveying.

We would like the Government to address the petition concerns by objectively reviewing how NRW is approaching red squirrel conservation in the light of 2018 national plans and seek a way to rebuild NGO trust in the authority.

Kind regards

Dr Craig Shuttleworth

ⁱⁱ <https://cdn.naturalresources.wales/media/691092/eng-red-squirrel-conservation-plan-for-wales.pdf>

ⁱⁱ <https://www.fao.org/documents/card/en/c/cc2229en> Mainstreaming biodiversity in forestry

ⁱⁱⁱ <https://www.redsquirrelsunited.org.uk/wp-content/uploads/2020/04/RSU-Cost-Benefit-Analysis-FINAL-REPORT.pdf>