

World Owl Trust

Working to save the World's Owls

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To: NNS Secretariat, Fera. Sand Hutton, York, YO41 1LZ

Please find herewith, the World Owl Trust's objections to the **UK NON-NATIVE RISK ASSESSMENT SCHEME Version 3.3 for the Eurasian Eagle Owl *Bubo bubo***.

The Trust objects to this Risk Assessment (referred to as the **R.A.** below) on the following grounds: -

1. We believe the Eurasian Eagle Owl's European subspecies *Bubo B. bubo* is, and always has been, a true native British species.

The question of Eagle Owl presence in Britain is a complex one which cannot be answered in this objection. In view of the current disagreement about this, and repetitious claims being made about this species' biology and behaviour - which we assert are based on studies carried out in Scandinavia and Europe rather than being applicable to Eagle Owls currently present and breeding in the UK – the Trust has produced a comprehensive dossier '*Eagle Owls in Britain – Alien or Native?*' of the facts as we see them. This is a lengthy dossier which makes its presentation here impracticable. However, we hope to have the report available on our website www.owls.org (click on to **World Owl Trust in Action/Reports**) by the 8th February and it will also be publicized in our quarterly newsletter. The Report will also be available as a hard copy from the above address. We would respectfully request that your assessors take the trouble to read through this before reaching any conclusions and recommending actions to be taken regarding this species.

2. The R.A. places too much emphasis on the Eagle Owl's role as a large and powerful generalist predator and makes statements, assumptions and conclusions on this aspect which are clearly based on readily available literature for this species rather than on first-hand knowledge of the species – and again are based on European and Scandinavian studies. For instance, there is constant reference to Cramp et.al. (1985) throughout the Assessors' answers in this document and we suspect that this book has been largely used as the main basis for their responses.
3. The R.A. makes incorrect statements regarding Eagle Owl movements and repeats 'parrot-fashion', so-called 'facts' which have been proved to be false.
4. We feel the R.A. is deliberately slanted towards a need to 'manage'/'control' (meaning 'cull'; see **B 1.30, 2.3**) Eagle Owls currently present and breeding in Britain. Like many other individuals and organisations the Trust feels that this R.A. is simply a first step towards such a decision being taken at the request of governmental bodies and certain NGO's.
5. The R.A. ignores past and present evidence of wild-origin Eagle Owl presence in Britain, and makes statements on the basis of unproven dogma and BOURC decisions.
6. In an email response to a query by a concerned ornithologist, a NNSS representative stated that the Secretariat *'regularly consult with expert organisations and individuals with regard to non-native birds and would expect them to bring any new information like this to our attention'*. He also asked that the Secretariat be sent any new information, so we hope you will find our comprehensive dossier useful! We would be extremely interested to learn who these 'expert organisations and individuals' are that you 'regularly consult with' since the Trust is always anxious to work with experts working in the same field as ourselves. Any help you can give in putting us in touch with them would be gratefully received.
7. We are dismayed that this R.A. (and the decision to place the bird on Schedule 9 of the W & C. Act 1981 – which incidentally we agree with) was not better publicized or made known to owl conservation organisations such as the World Owl Trust, Hawk & Owl Trust, International Owl Society and many private individuals who work in owl research and conservation. Once we ourselves discovered its existence and contacted other people working in this field we were surprised to learn that **none** of these people were aware of the document or the need to respond to it. We now find that it seems to have been taken off the internet and is thus now impossible to download. We cannot help but suspect that this has been done deliberately in response to the number of objections we know have been sent in to you – and perhaps to avoid the possibility of CABI's conclusions being shown to be flawed prior to a

final decision being taken. If this is the case it could result in a decision being made (on a cull for instance) which could later prove to be incorrect (and possibly against European Law (i.e. the **Birds Directive**). Why wasn't this R.A. made public knowledge through the media?

We would now like to go on to comment on some specific points.

Question **N1 'What is the reason for performing the Risk Assessment'** (surely the most important question of all?) has not been answered in any way whatsoever! Presumably, since the Introduction to your Risk Assessments in general states that these '*are a key tool in the armoury against invasive non-native species*' this designation for the Eagle Owl is the reason for the R.A. for *Bubo bubo*? So why wasn't this stated so that responders could be completely clear about the reason? If this is the case, then as stated above, the WOT does not agree with this designation despite the BOURC's continued refusal to replace the Eagle Owl onto the official British List.

A11 It is true that the Rabbit has been shown to be an important prey item for British Eagle Owls (observations made at both the North Yorkshire site and Bowland in Lancashire). This surely is a point in favour of its predatory role in the UK, as is its predation on Corvids.

Finally, a very puzzling aspect of the above is that DEFRA's own Guidelines on what does or does not constitute a native species state '*a native species is a species, subspecies or lower taxon occurring within its natural range (past or present) and dispersal potential (i.e. within the range it occupies naturally or could occupy without direct or indirect introduction or care by humans*'. This surely flies in the face of the BOU ruling, and is the one we ourselves prefer to follow.

Tony Warburton,

Hon. President, World Owl Trust,

2 February 2010

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We trust that all responders will in future be notified of any discussions or decisions taken regarding this matter.



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