

People's Trust for Endangered Species'
case for listing hedgehogs on Schedule 5 in response to
JNCC's consultation on Wildlife & Countryside Act (1981) Quinquennial Review 7
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Hedgehogs (*Erinaceus europaeus*) are one of the most well-known and best-loved mammals in the UK. Yet despite being widespread, their numbers have dropped alarmingly in the past few decades. The limited protection afforded by listing on Schedule 6 has not prevented a continued and worrying decline. To avoid further, irrecoverable deterioration of its conservation status, it is strongly recommended that the hedgehog is given full protection on Schedule 5.

Eligibility criteria

It is required that the species is considered for country protection under international obligations, since it is listed on Bern Convention Appendix III. Article 7 (Bern Convention) calls for each contracting party to take appropriate and necessary legislative and administrative measures to ensure the conservation of the wild fauna species listed. Since their listing, in 2006, as a priority species on [Section 41](#) of the NERC Act, and equivalent in Scotland ([S 2\(4\) Nature Conservation \(Scotland\) Act 2004](#)) and Wales ([S. 7 Environment \(Wales\) Act 2016](#)), hedgehogs have benefited from increased protection. Yet the species is still declining. It is evident that current measures are insufficient, and the protection afforded the species under the NERC Act is not fulfilling the UK's obligations under Bern. Data within the *State of Britain's Hedgehogs 2018*¹ provides evidence that rural populations declined by up to 50% between 2002 and 2017. The *Breeding Bird Survey* (BBS) run by the British Trust for Ornithology (BTO) showed an annual decline in hedgehog numbers of 8.3% between 2002 and 2019 (*State of Britain's Hedgehogs 2022* (in prep.)) PTES/BHPS).

Hedgehogs are listed as Vulnerable under the GB IUCN red list. This IUCN category defines these species as *facing a high risk of extinction in the wild*. This rate is unsustainable and species facing such a risk arguably need greater protection before their situation worsens, pushing the species into a higher category of threat before the next QQR.

One such example of unsustainable mortality is the level of roadkill faced annually by hedgehogs. The extent of road mortality nationally can be estimated from counts of hedgehog [casualties](#). Recent estimates of 'carcass persistence time' and casualty rate (L. Moore, pers. comm.; PTES' *Mammals on Roads* survey) indicate an annual mortality (in GB) in excess of 200,000 hedgehogs. Although difficult to quantify precisely, this is a significant proportion of the national population, most recently [estimated](#) at 879,000, and likely to impact numbers negatively.

Decision criteria

Hedgehogs also meet the decision criteria for being listed on Schedule 5. Across their range in the UK, they are subject to various intentional and reckless killing and injuring section 9(1), and damage and disturbance to their places of shelter section 9(4). There have been numerous cases of hedgehogs being subject to mistreatment and abuse. The RSPCA collates incidents of abuse including beating, improper killing, mutilation, and neglect. In the period 2011-15 incidents involving more than 6,000 hedgehogs were recorded, and that number increased to almost 7,000 in the subsequent five-year period up until 2020 (Grogan pers. comm.). Examples include one hedgehog killed by teenagers in Staffordshire after being kicked like a football (RSPCA news 1 September 2021), two animals kicked to death in Northamptonshire (RSPCA news 16 July 2021) and a hedgehog dying after being set on fire by a group of men in Swindon (RSPCA news 18 November 2016).

¹ <https://www.britishhedgehogs.org.uk/pdf/sobh-2018.pdf>

Hedgehogs are one of the predators trapped incidentally as part of lethal control measures to protect game birds on shooting estates. The National Gamebag Census (NGC), run by the Game & Wildlife Conservation Trust (GWCT), provides a central repository of records from shooting estates across the UK. Nearly 300 sites across England contributed data for the past four decades, with hedgehog records being supplied from four regions over the last ten years. Hedgehogs are currently listed on Schedule 6 (WCA) prohibiting them being 'taken by certain methods' ([section 11](#)). Yet despite this protection and despite excluders being 'available' and 'effective' to fit on traps, hedgehogs are still being reported as part of the NGC. Therefore, greater protection from killing is needed. Listing on Schedule 5 would protect hedgehogs under Section 9(1) from this predictable and avoidable killing.

Without higher protection afforded by Schedule 5 section 9(4a), hedgehogs are subject to predictable and avoidable killing whilst in their place of shelter when development works take place. Large-scale works can have far-reaching impacts on hedgehog populations and even small-scale developments have the potential to be detrimental, threatening extinction to local rural populations. Rural hedgehog population densities are much lower than their urban counterparts². Minimal viable populations (MVP) of rural hedgehogs, subject to greater interannual variation, can be as high as 250 individuals, requiring up to 57km² of connected habitat. Without crucial protection against damage or disturbance to nesting sites and places of shelter, the rural hedgehog population remains critically threatened. If given increased protection, local authority roles in both promoting and ensuring compliance with the legislation would be reinforced under Section 25 (WCA), which is arguably a stronger measure protection currently afforded through the NERC Act.

Wild hedgehogs are also subject to exploitation with recent incidences of animals being offered for sale online section 9(5) (BHPS Vass pers. comm.). The increase in popularity of non-native hedgehog species as pets in the UK has resulted in opportunistic captures and sales of native hedgehogs. There is frequent confusion between the species which puts UK hedgehogs at risk.

Other supporting information:

The hedgehog is one of the nation's best-loved animals. Two recent petitions show the scale of the widespread concern for the species' future. Over 1,000,000 signatories supported a call to make 'hedgehog highways' a legal requirement in new housing [developments](#) and more than 100,000 people signed a government petition which resulted in a parliamentary [debate](#) to move the species to Schedule 5.

Hedgehogs are the mammal species most frequently brought into animal care facilities, which is testimony both to the great affection the general public has for hedgehogs and to the many incidental threats they face. Many people who rescue these animals do so because they are aware that the species is in decline. However, the well-intentioned but misguided 'rescue' of a hedgehog can also cause problems. These include the collection of healthy hedgehogs to be overwintered indoors in the belief that this is better for their survival than allowing them to hibernate in the wild; and the release of hedgehogs into areas without a full assessment of the release site's suitability for the species, as would be required by the IUCN's guidelines on reintroductions. Whilst many of these threats cannot be alleviated by legislation, it is even more reason to reduce the threats that can be addressed by elevation to Schedule 5.

The government's own press release announcing the implementation into law of the new *world-leading* Environment Act in November [2021](#), champions how this new legislation includes *new*

² [http://www.wlgf.org/Moorhouse%20\(2013\)%20Population%20viability%20analysis%20of%20hedgehogs.pdf](http://www.wlgf.org/Moorhouse%20(2013)%20Population%20viability%20analysis%20of%20hedgehogs.pdf)

legally binding targets on species abundance for 2030, which will help to reverse declines of iconic British species like the hedgehog.

It is clear that there is a robust case for adding hedgehogs to Schedule 5 of the Wildlife and Countryside Act 1981 as part of the QQR7. The species has suffered a population decline in both rural and urban areas over the past couple of decades as documented in the *State of Britain's Hedgehogs 2018*. There is also overwhelming evidence that the species has undergone a longer-term, widespread, sustained decline across the country as demonstrated by data from the Game and Wildlife Conservancy Trust's [National Gamebag Census](#) (NGC). In the 1980s, the density of hedgehogs reported to the NGC indicated high hedgehog prevalence across most of Great Britain. By the 1990s, the areas of high density had broken up into large patches located across the southern half of Scotland, in north-west, eastern and central southern England, and north Wales. Many sites in south-west England and Wales that had reported hedgehogs in the 1980s had stopped reporting them by the 1990s. In the 2000s, the high-density patches shrank further, while the areas with no hedgehog reporting expanded eastwards from the west coast. By the 2010s, high-density areas were restricted to south-east Scotland, north Wales and eastern England. Hedgehogs were no longer reported from most of western and northern Scotland (except on some large Hebridean islands). In England, they were no longer reported from the north, south-east, south-west and part of the West Midlands. Overall, from beginning to end of all four decades, the net result has been widespread declines in reporting across almost the whole of Great Britain.

In this period of severe global biodiversity crisis, the obvious decline of a widespread, generalist species rings alarm bells. To wait until hedgehogs are in critical danger of extinction rather than acting prudently to protect them now would be seriously neglectful. We urge JNCC to recommend hedgehogs are given full protection under Schedule 5 in this current quinquennial review.