

GB Invasive Non-Native Species Framework Strategy – Consultation Response Form



Name: Organisation: This is a Joint Links submission from Scottish Environment Link (SEL), Wales Environment Link (WEL) and Wildlife and Countryside Link (WCL). The following Link members support this response: Bat Conservation Trust Buglife - The Invertebrate Conservation Trust Butterfly Conservation Keep Wales Tidy Marine Conservation Society National Trust for Scotland Plantlife International Royal Society for the Protection of Birds (RSPB) The Wildlife Trusts Woodland Trust

Please indicate which category of organisation you represent: Conservation/NGO
Other category (Please specify):

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PUBLICATION OF RESULTS

Are you responding: a) As an individual (Please go to c)	Yes: <input type="checkbox"/>	No: <input type="checkbox"/>
b) On behalf of a group/organisation (Please go to e)	Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>

INDIVIDUALS

c) Do you agree to your response being made available to the public (in the relevant GB Administration library and website and/or on the non-native species secretariat website)? If Yes, please go to d. If your answer is No we will treat your response as confidential.	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
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d) Where confidentiality is not requested, we will make your response available to the public on the following basis (please tick one of the following boxes)

Yes, make my response, name and address all available.	<input checked="" type="checkbox"/>
Yes, make my response available, but not my name or address.	<input type="checkbox"/>
Yes, make my response and name available, but not my address.	<input type="checkbox"/>

RESPONSE ON BEHALF OF GROUPS OR ORGANISATIONS

e) The name and address of your organisation will be made available to the public (in the relevant GB Administration library and website and/or on the non-native species secretariat website). Are you also content for your response to be made available? If your answer is No we will treat your response as confidential.	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
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SHARING RESPONSIBILITIES/FUTURE ENGAGEMENT – ALL RESPONDENTS

We will share your response internally with other policy teams in GB Administrations who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content to be contacted again in relation to this consultation response?

Yes:

No:

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THE QUESTIONS IN THE DRAFT STRATEGY ARE REPRODUCED UNDER EACH CHAPTER HEADING BELOW. PLEASE TICK WHERE APPROPRIATE AND INCLUDE ANY COMMENTS IN THE SPACE PROVIDED.

1.) INTRODUCTION

1) Do you agree that non-native species, driven here by climate change, and which might pose threats of an invasive nature, should be within the scope of this strategy?

Yes: No:

Comments: This is unrealistic. Our response to climate change should be to maximise resilience of native systems by optimising current habitat extent and quality, and then to facilitate biotic adaptation to new conditions. To attempt to effect direct resistance to species arriving of their own accord, as their climate envelope shifts, would be resource hungry, prohibitively complex, of doubtful sustainability and likely to fail. For example, problems would arise in distinguishing between movements and effects entirely generated by climate change, movements caused by other anthropogenic habitat alterations, and those due to natural range fluctuations or local ecological succession. In reality, these factors will often interact in complex and poorly understood ways to produce varied effects.

Non-native species arriving as a direct consequence of human activity - deliberate and accidental - constitute a distinct global and national problem. It deserves and requires the sole focus of the current strategy. Species movements do, obviously, occur both naturally, and indirectly as a consequence of human impacts on the environment such as habitat changes. There are, however, real and important differences between these, and direct human introductions of non-natives. Quantatively, the rate of arrival of novel species in new regions as a result of direct human introduction is far higher than that of species arriving naturally or through indirect factors. Relevant studies estimate this rate to be many thousands of times faster than the 'background' rate of species arrival. Qualitatively, the differences lie in the pervasiveness of directly assisted species movements (what was once an occasional acute biological event has become chronic global biotic mixing), and in the extent of directly assisted species movements (movements that would be impossible under natural conditions are now routine - for example the repeated arrival in Britain of terrestrial flatworm species from New Zealand). We caution that efforts to extend the remit of the strategy as suggested would, in fact, result in a dilution of its potency and a severe reduction in its efficacy.

2) Do you agree that the eight key recommendations of the 2003 report remain valid?

Yes: No:

Comments: This strategy should develop, extend and supercede these recommendations: for example, the establishment of an effective rapid response capacity urgently needs development and implementation.

Comprehensive risk assessments can take a significant amount of time and we would suggest the addition of a rapid assessment methodology in order to: identify species of particularly high risk which may require lengthy investigation and research before carrying out a comprehensive risk assessment; and to allow a rapid response to species that are currently arriving/arrived in GB and could pose an imminent threat, which have not undergone the comprehensive risk assessment procedure before.

3) Are there new key areas of action, not embraced by the recommendations of the 2003 report that should be addressed? If so, what are these areas and how might they be addressed?

Yes: No:

Comments: Marine issues are not yet adequately covered in this strategy. Coastal systems in particular need to be protected against non native species invasions. Ballast water dumping is a key transmission route for invasive organisms and is an issue that requires needs continuing work before satisfactory responses can be agreed. The strategy should explicitly work towards UK ratification of international ballast water conventions.

The UK Overseas Territories should be included in the strategy's scope. These include important centres of biological diversity and many, being oceanic islands, are highly vulnerable to invasion from non native invasive species. A large proportion of the UK's biodiversity resides on these islands and it must be protected. There is little evidence that

piecemeal action at the individual-territory scale is, or will be, sufficient.	
4) The strategy is predicated on the basis that tackling these issues must involve strong partnership working between all stakeholders through their various functions and roles – do you, or does your organisation support this principle?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments: The Joint Links support a strong partnership approach. This appears to be contradicted by Annex 4 which suggests that stakeholders should only be involved as a 'sounding board' and in selected working groups, as agreed by Programme Board. The strategy acknowledges the wide and complex scope of the NNS issue, and the many diverse roles and responsibilities, but it simultaneously attempts to keep stakeholders at arms length from government. Closer partner involvement at a strategic level would pay significant dividends in delivery of the strategic aims of the strategy, and it need not be unwieldy. Stakeholder umbrella groups should be properly represented on the Programme Board, with 2 places for NGOs and the same for industry. It is hard to imagine how else the required levels of strategic coordination and cooperation could be achieved.	
5) Do you agree with the proposed shift towards an increased emphasis on a more preventative approach, in other words, an approach that involves investment now to reduce future risks and costs?	Yes: <input checked="" type="checkbox"/> No: <input checked="" type="checkbox"/>
Comments: Emphasis on prevention is important but it must be balanced against a proportionate and effective approach to tackling species already established in the wild. Species have different, sometimes very extended (a century or more) time lags after initial establishment but before they become detectable in the wild and/or invasive. Downplaying established species that are not yet a problem will store up difficulties for the future and will impact on any cost saving that results from strategy implementation. The establishment and spread of NNS needs, where possible, to be nipped in the bud before problems arise.	
6) Do you foresee any significant pitfalls or opportunities in making this happen?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments: See above.	
7) Do you have any other comments on Chapter 1 - Introduction?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments: The vision needs to be more action-orientated with a specific, explicit action to combat the impact of non native invasive species on native biodiversity. We support the second to last sentence in paragraph 1.12 about eradication needing to be both necessary and feasible. We believe this adds a necessary degree of pragmatism and sustainability to any considerations of control/eradication.	

2.) STRATEGIC AIMS	
8) Do you agree that the statement of Strategic Aims captures the scope of what is needed?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
Comments: We agree with stated aims, but current order - even if it is not intended to strictly reflect priority - is misleading and sets a false context: bullet points 3,4 5, 6 should become bullet points 1,2, 3 and 4.	
9) Do you have any other comments on Chapter 2 – Strategic Aims?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Comments:	

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3.) SCOPE AND TERMINOLOGY	
10) Do you agree with paragraph 3.1 that this strategy should aim to set out a high-level strategic game plan for the GB administrations and their related bodies whilst providing sign-posts for other non-governmental regional or local programmes and initiatives?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments: The strategy must cover the UK Overseas Territories, where our responsibilities to global biodiversity conservation are largely concentrated. The impact of non native invasive species is likely to represent the most significant threat to the biodiversity of these territories.	
11) How do you think that this process can work best so that the strategy adds value to non-governmental programmes and initiatives?	
Comments: By including NGOs and industry on the Programme Board, the process is strengthened and supported by a wider constituency.	
12) Do you agree with the approach described in paragraph 3.3?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments:	
13) Do you have any other comments on Chapter 3 – Scope and Terminology?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Comments:	

4.) THE GB NON-NATIVE SPECIES MECHANISM – ROLES AND RESPONSIBILITIES	
14) Do you feel that the GB Non-Native Species Mechanism has all the key components to oversee delivery of this strategy?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Comments: The current mechanism does not take full advantage of the experience and expertise of partners - see question 4. A widely recognised, trusted, easily accessible, central point of contact for the public is essential. The secretariat has neither the resources nor staff to fulfill this role. We suggest that in establishing the required rapid response capacity, the resultant body is designed to be a recognisable and approachable entity, acting as a public point of contact and disseminating messages and materials. This will require adequate resources from government.	
15) Do you have views or suggestions on how to maximise the benefits to be gained from each of the GB Mechanism's component parts?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments: See above	
16) What pitfalls or difficulties do you foresee the GB mechanism will need to address?	
Comments: The extent to which relevant legislation can diverge between countries is limited by the influence of EU Directives. However, where legislative differences do occur, these will need to be carefully coordinated.	
17) Do you have any other comments on Chapter 4 – The GB Non-Native Species Mechanism?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Comments:	

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5.) STRATEGIC APPROACH	
18) Do you, or does your organisation, support this overall approach in Chapter 5? If not, what cost-effective alternatives do you suggest?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments:	
19) Given that resources always have limits, do you have suggestions or ideas for maximising the benefits to be gained from this approach?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments: There needs to be a broad and explicit acceptance that the end product of this process will be minimum net damage to native biodiversity from non-native species impacts. While this process will require resources now, these will be recouped through cost savings in future as invasive species problems are tackled quickly and effectively at the earliest possible invasion stage.	
20) Do you have any other comments on Chapter 5 – Strategic Approach?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Comments:	

6.) PREVENTION	
21) Do you agree with paragraphs 6.4 & 6.5?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments:	
22) Do you: a) Support the Chapter 6 (Prevention) objective?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
b) Support the Chapter 6 (Prevention) underpinning actions?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments: To preserve the genetic diversity of populations of GB species, measures should be considered to encourage the use of native genetic stock. Imported populations of native species are not considered as non-native invasive species as such, however protecting species diversity at a genetic level is an important part of preserving our natural biodiversity and where possible should be highlighted in public communications and industry codes of practice.	
23) Do you have suggestions or ideas for maximising the benefits to be gained from these actions?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments: Experience from risk assessments used - both successfully and otherwise - in other countries around the world should be studied and lessons applied in GB, e.g. Australia has experience in this area from which we could and should learn.	
24) How can you or your organisation help through your specific functions, roles or responsibilities?	
Comments: The only efficient way for the Joint Links to be involved is through inclusion on the Programme Board. Joint Links rely on volunteer time from member organisations and input is therefore limited to the most cost effective ways of involvement. Member organisations are, however, actively engaged in diverse non-native species issues.	
25) Do you have any other comments or suggestions for inclusion in Chapter 6 – Prevention?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Comments:	

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7.) EARLY DETECTION, SURVEILLANCE, MONITORING AND RAPID RESPONSE	
26) Do you agree with the general principle expressed in paragraph 7.6?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments:	
27) Do you: a) Support the Chapter 7 objective?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
b) Support the Chapter 7 underpinning actions?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments: The objective should read "to detect, monitor and respond to.." Roles and responsibilities should be more clearly defined. For example, strategic action must guide local action but, for control action to be effective there must be ways of ensuring that effective local action is actually undertaken. This division of responsibilities needs to be made clearer.	
28) Do you have suggestions or ideas for maximising the benefits to be gained from these actions?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments: Current monitoring is piecemeal and does not have sufficient coverage for early detection of potential problem species in the wild. Implementation of the Water Framework Directive, for example, should include the targeted monitoring of aquatic non-native plants and invertebrates, to species level. Monitoring needs to be fit for purpose and well coordinated, with current gaps filled by a combination of agency and volunteer schemes.	
29) How can you or your organisation help through your specific functions, roles or responsibilities?	
Comments: Joint Links member organisations run a wide range of monitoring schemes and in most cases data are suitable for inclusion on NBN.	
30) Do you have any other comments on, or suggestions for inclusion in Chapter 7?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Comments:	

8.) MITIGATION, CONTROL AND ERADICATION	
31) Do you agree with the general principle expressed in paragraph 8.3?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments:	
32) Do you: a) Support the Chapter 8 objective?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
b) Support the Chapter 8 underpinning actions?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments: The objective here is good and would promote progress. However, the mechanism requires a robust rationale for quickly identifying where and when containment, control or eradication of species should take place. This is not yet included.	
33) Do you have suggestions or ideas for maximising the benefits to be gained from these actions?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments: The success of any mitigation scheme depends on: (i) science based, adaptive management (ii) public support (iii) realistic costing and long term planning.	

The Programme Board need to ensure they are up to date with scientific developments to ensure effective, safe and sustainable action on the ground.

34) How can you or your organisation help through your specific functions, roles or responsibilities?

Comments: Joint Links member organisations conduct a range of mitigation control and eradication programmes around GB and are ready to share their experience and information. The best way to do this is inclusion on the Programme Board.

35) Do you have any other comments on, or suggestions for inclusion in Chapter 8?

Yes: No:

Comments: The focus of this section should be on the general biological problems presented by invasive non native species. It needs more work in this respect.

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9.) BUILDING AWARENESS AND UNDERSTANDING		
36) Do you:	a) Support the Chapter 9 objective?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
	b) Support the Chapter 9 underpinning actions?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments:		
37) Do you have suggestions or ideas for maximising the benefits to be gained from these actions?		Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
<p>Comments: Effective communications should be delivered through a combination of a dedicated and centrally administered public awareness campaign, in combination with the proper and full involvement of partner organisations, each of which targets and communicates with audiences within their reach on a regular basis. Stakeholder groups to the invasive species forum will be very important in this regard. We believe that the most cost effective, and effective, way of raising awareness is to work in partnership with all stakeholders, to agree messages, support the production of materials to communicate those messages and to provide consistency between these messages, government action and policy. This should be seen as a key outcome of this strategy.</p> <p>A second key factor in communicating the relevant messages will be leading by example, i.e. the adoption of good practice by government, national and local. This should be evident in, for example, procurement, agriculture policy, engagement with trade and industry and horticultural activity.</p> <p>It is imperative that communications on invasive species must be included on all relevant licences and documents, eg fishing licences. There are many current opportunities not being utilised.</p>		
38) How can you or your organisation help through your specific functions, roles or responsibilities?		
<p>Comments: Joint Links member organisations have the support of over 8 million members, who are reached through regular communications on key issues, including invasive non native species. This large audience is already receptive to invasive species issues and would easily be targeted where Link member organisations agree priorities and actions.</p>		
39) Do you have any other comments on, or suggestions for inclusion in Chapter 9?		Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
<p>Comments: A key element of building awareness and understanding is dedicated training for individuals working at key pathways and in monitoring at a site level. This applies to agency staff who are required to survey for Water Framework Directive and Habitat Directive requirements, for example, as well as other professional and volunteer schemes.</p>		

10.) LEGISLATIVE FRAMEWORK		
40) Do you:	a) Support the Chapter 10 objective?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
	b) Support the Chapter 10 underpinning actions?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments: Fit for purpose should cover "proportionate in the better regulation sense" and we suggest the latter part of the sentence is deleted.		
<p>We need effective legislation: current legislation, particularly the Wildlife and Countryside Act Section 14 and Schedule 9, is not adequate. Ongoing tweaks are insufficient to rationalise this and make it effective. It requires more fundamental revision.</p>		

41) Do you have suggestions or ideas for maximising the benefits to be gained from these actions?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments: The biological and economic rationale behind species legislation should be recognised and understood by all practitioners. This will require training within law enforcement agencies.	
42) How can you or your organisation help through your specific functions, roles or responsibilities?	
Comments: Joint Link members are prepared to support the implementation of effective legislation through involvement in parallel initiatives to Partnership Against Wildlife crime for example.	
43) Do you have any other comments on, or suggestions for inclusion in Chapter 10?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Comments:	

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11.) RESEARCH		
44) Do you:	a) Support the Chapter 11 objective?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
	b) Support the Chapter 11 underpinning actions?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments:		
45) Do you have suggestions or ideas for maximising the benefits to be gained from these actions?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>	
Comments: The Programme Board needs to actively track progress in research on biological control, particularly research on immunocontraception techniques.		
46) How can you or your organisation help through your specific functions, roles or responsibilities?		
Comments: Joint Links member organisations conduct a wide range of research into specific areas of interest as appropriate, and apply this research to species and habitat conservation. Member organisations would be keen to ensure research is not repeated unnecessarily and that gaps in requirements could be filled through partnership working. Such coordination will require closer partnership than the occasional 'sounding board' concept proposed.		
47) Do you have any other comments on, or suggestions for inclusion in Chapter 11?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>	
Comments:		

12.) INFORMATION EXCHANGE AND INTEGRATION		
48) Do you:	a) Support the Chapter 12 objective?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
	b) Support the Chapter 12 underpinning actions?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments:		
49) Do you have suggestions or ideas for maximising the benefits to be gained from these actions?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>	
Comments: The secretariat should be resourced to access and collate the grey literature from around the world and act as a central repository for a database of this information.		
50) How can you or your organisation help through your specific functions, roles or responsibilities?		
Comments: As umbrella organisations, SEL, WEL and WCL have well established and effective mechanisms to exchange information and will be able to ensure that member bodies have access to information on invasive non native species.		
51) Do you have any other comments on, or suggestions for inclusion in Chapter 12?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>	
Comments: Keeping the overseas territories informed is insufficient to prevent serious loss of biodiversity. These territories need to be fully included within scope of this strategy.		

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13.) IMPLEMENTATION REVIEW	
52) Do you have any comments on Chapter 13?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments: The strategy does require a timescale, without which it is difficult to judge whether a 5 yearly evaluation is sufficient or not, although best practice would indicate evaluation should be more frequent, but that review should be on a 5-yearly basis.	

CONCLUDING QUESTIONS	
53) Looking back over this strategy, do you feel that the Vision statement in the Introduction clearly encapsulates the overall approach set out?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments:	
54) a) As an overall strategic framework, do you feel that this strategy is balanced in terms of the proposed work areas?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
b) Could it be improved, if so, how?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments: See below.	
55) Do you have any views on the relative balance of priorities across the areas covered in this framework strategy?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments: We would urge caution in focusing too closely on prevention to the detriment of mitigation and control. Preventative measures must work alongside those tackling established non native invasive species in the wild. Both approaches are important in minimising the impacts of non native invasive species.	
56) Are there any other significant issues or work areas not covered that should be covered, or that would not clearly fall under any of the existing work areas in the strategy?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments: This strategy provides a high level steer. However, we would estimate that the cost of implementation is likely to be in the region of a few millions of pounds per year, some of which will need to be core dedicated funding, in place on a relatively long time scale. Extending existing training and monitoring budgets etc will be insufficient. We are concerned that marine species and habitats are not sufficiently covered in this strategy. This strategy should at least commit GB governments to constructive engagement with ballast water initiatives and work towards ratification of relevant conventions and treaties.	
57) Do you have any comments on the RIA document?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Comments:	

Thank you for completing this questionnaire. Please email your saved questionnaire to nness@csl.gov.uk