

Invasive Species inquiry

Evidence for the Environmental Audit Committee by Wildlife and Countryside Link
April 2019

Wildlife and Countryside Link (Link) is the largest environment and wildlife coalition in England, bringing together 52 organisations to use their strong joint voice for the protection of nature. Our members campaign to conserve, enhance and access our landscapes, animals, plants, habitats, rivers and seas. Together we have the support of over eight million people in the UK and directly protect over 750,000 hectares of land and 800 miles of coastline.

Link's Invasive Non-Native Species (INNS) Working Group addresses issues associated with invasive non-native species in the UK, through both practical intervention and appropriate legislation.

This response is supported by the following Link members:

- *A Rocha UK*
- *Amphibian and Reptile Conservation*
- *Angling Trust*
- *British Canoeing*
- *Buglife*
- *Plantlife*
- *The Rivers Trust*
- *RSPB*
- *The Wildlife Trusts*
- *Woodland Trust*

INTRODUCTION

1. Non-native species are species living outside their natural range which have arrived there by direct human activity, deliberately or accidentally. Invasive non-native species (INNS) are those that negatively affect native biodiversity, ecosystem services and/or public health, through mechanisms such as predation, competition or disease transmission. INNS are known to cost Great Britain at least £1.7 billion per year, affecting agriculture, horticulture, forestry, transport, construction, recreation, aquaculture and utilities.
2. The threats posed by INNS to biodiversity and ecosystems is one of the greatest challenges for conservation. The Convention on Biological Diversity (CBD) has identified the combined effect of climate change and INNS as the strongest driver of global biodiversity loss. INNS are thought to be the most serious current factor driving vertebrate extinctions.
3. Rates of establishment of new species and their negative impacts are increasing and accelerating at world, European and UK scales. Increasing globalisation of trade (the single most important vector of INNS) is increasing species movements and rates of release, thus intensifying problems.

RESPONSES TO QUESTIONS POSED BY THE COMMITTEE

Q1. How well is the UK and its overseas territories managing the impact of invasive species and controlling the risks of further invasion?

4. Domestic legislation to tackle the UK's INNS threat is weak and places too little emphasis on biosecurity i.e. preventing species from establishing in the first place. It provides no

statutory responsibility on any of the UK's Administrations to implement INNS biosecurity measures, except for the 49 species included on the EU List of Alien Species of Union Concern, which is itself far from comprehensive. The EU's Invasive Alien Species (IAS) Regulation significantly enhances the UK's INNS biosecurity legislation, however, its implementation across the UK is poor.

5. The current spend on INNS biosecurity in the UK is inadequate; the spend in England in the 2016/2017 financial year was only £922,000, significantly contrasting with the UK Government's estimate that INNS cost the UK's economy £1.7 billion annually. Because of the UK's low spending on INNS biosecurity, all of the UK's Administrations have failed to meet their statutory deadlines for the implementation of biosecurity measures under the IAS Regulation.
6. A current lack of capacity and resourcing means the UK is not able to effectively tackle the current threat that INNS pose to the UK, meaning it will not be able to address intensified future threats, in particular from new trading relationships.
7. Link is concerned that there is a risk from more alien species being imported and/or bred as pets being released or abandoned. We therefore support adequate restrictions on the introduction, trade in and keeping of any listed species.
8. The UK Overseas Territories are home to over 94% of the unique wildlife for which the UK is responsible, as well as a third of the world's albatross, a quarter of the world's penguins, and the largest coral atoll on the planet. As mostly oceanic islands, the Territories are crucibles of evolution, with environments that are extremely vulnerable to the introduction of INNS. Today, INNS represent the single biggest threat to OT biodiversity, with the result that 85% of our Critically Endangered species are in the Territories.
9. A 2014 study reported that at least 2,012 INNS already occur in the UK Overseas Territories. The OTs frequently have very small populations, so their capacity is often extremely limited to be able to prevent introductions or respond to invasions. Ongoing UK Government support and sharing of extensive technical expertise is essential if the threat of new INNS is to be addressed.
10. Link considers that a UK withdrawal from the EU may provide an opportunity to strategically consider the future of the UK's biosecurity legislation and wants to see ambition for yet more effective controls, especially for new trade deals that may be struck post-Brexit.

Q2. Of those that are already in the UK, which invasive species are posing the greatest harm to:

a. human health;

11. Giant hogweed (*Heracleum mantegazzianum*) contains a toxic sap which reacts with human skin, particularly in bright sunlight, to cause painful 'burning' blisters and purple blotching on the skin. If the sap gets into the eyes it can cause blindness.

12. Ragweed (*Ambrosia artemisiifolia*) is a non-native plant that is establishing and spreading in the UK. Its pollen is highly allergenic causing and aggravating hay fever and associated symptoms.

b. animal health;

13. Signal crayfish – introduced in the 1970s, this species has resulted in an extensive decline in white clawed crayfish due to direct competition for resources and the spread of a fungal crayfish disease carried by the signal crayfish. It has also had negative impacts on communities of aquatic plants, invertebrates and benthic fish, with a decline in salmon and trout numbers in the presence of signal crayfish.
14. Grey squirrels – carriers of the virus squirrel pox and can spread the disease to native red squirrels, whilst being immune themselves. The squirrel pox virus is regarded as a significant factor in the decline of red squirrel populations in the UK.

c. biodiversity.

- Killer shrimp – recognised as one of the 100 worst INNS in Europe in terms of negative impacts on biodiversity and ecological functioning in invaded environments. This aggressive species predated on a wide range of aquatic invertebrates, fish fry and eggs. Currently it has been observed in a small number of waterbodies, but it is expected to be capable of establishing throughout Great Britain.
- American mink – among their prey is the protected water vole which has seen a 94% decline in numbers over the 20th century attributed to predation and habitat changes.
- Himalayan balsam – colonises river banks, damp woodlands, railways and wasteland. It can outcompete native plant species due to its ability to rapidly reproduce and grow dense stands. Some evidence suggests its large amount of nectar can result in less pollination of native plant species by bumblebees leading to further losses in biodiversity.
- Asian hornet – a highly effective predator of insects, this species poses a significant threat to native pollinators which are already in decline. Link is supportive of measures to elevate public vigilance to prevent the further establishment of this species, and the rapid and effective action taken so far in response to sightings of this species.
- Non-native species of flatworm can be introduced in the soil of imported pot plants. Many of them prey upon earthworms and land snails, endangering soil fertility, food production and wildlife. Eleven INNS flatworms are already well established in the UK and have reduced numbers of earthworms in some populations by 75%.

Q3. What are the risks of invasive non-native species migrating to the UK from future climate change?

15. There is an important distinction between species that move because their range is shifting as a result of climate change, and those species moved *directly* through human agency – deliberately moved and released or accidentally transported as ‘stowaways’. Link maintains that the former should not be considered as INNS, whereas the latter should. Climate

change will, however, improve establishment conditions for new species brought in by people. That is the principal link between INNS and climate change issues.

16. The most pressing risks are:
 - a. **International trading patterns:** The creation of new trade routes, as well as the expansion of existing ones, creates additional pathways for novel INNS to arrive in the UK.
 - b. **Poor biosecurity and lack of pathway action plans.**
 - c. **Leaving the EU:** See responses to questions 8 and 9.

Q4. What actions should the UK take to mitigate the risk, or adapt to, climate migrations of invasive species?

17. See point above regarding the relationship between climate change and INNS.
18. Rapid action at the earliest possible invasion stage makes clear ecological and economic sense (prevention is much cheaper than cure) and has been reflected in subsequent national and international efforts to tackle INNS issues – including key successes, for example in New Zealand and Australia.
19. It is not possible to predict which species will become invasive. Many INNS establish in the wild but become invasive only after a benign lag period that can last many decades, and the invasive forms may differ considerably from original donor stock. Therefore, whilst not all non-natives are invasive, in order to effectively respond to the threat, any non-native species should be considered a potential invader. The precautionary approach does not mean that we always advocate the removal of all non-native species irrespective of other considerations.
20. Action on INNS should be undertaken with timely, planned, strategic approaches, with eradication actions operating at effective ecological scales (e.g. whole island/archipelago/catchment as appropriate). This may include situations where INNS have been established for long periods, and also situations where environmental damage from INNS has yet to be detected. Management should be prioritised and planned to avoid long term adverse environmental impacts or population-level impacts on non-target species, and plans should consider public sensitivities in relation to target species.

Q5. Where should the four nations prioritise resources to tackle invasive species?

21. Link is concerned that the UK Government and the Devolved Administrations are not currently allocating enough resources to allow officials to prepare for or undertake new biosecurity roles.
22. Some species groups are particularly prone to becoming invasive, especially: freshwater fish; crayfish; aquatic plants; predatory vertebrates. Some environments/habitats are particularly vulnerable to invasion damage, especially: islands, native woodlands and freshwater bodies.
23. Biosecurity and pathway control measures are the key prevention mechanisms. Prevention via biosecurity is often the only effective mechanism for marine INNS and is critical in

protecting vulnerable islands and freshwater bodies. Pathway action plans must be devised and implemented for high risk routes where INNS can be introduced such as angling, boating and trade.

24. Control of imports and preventing the establishment in the wild of those species that are not commonly widespread in the UK, such as raccoon dogs, racoons and coatis, is essential. We are concerned that the pet trade and increasing desire for these species from consumers will increase the threat of these species becoming established in the wild.
25. Due to the low levels of existing domestic funding for INNS management, EU funds – notably the LIFE fund - provide a significant contribution to reducing the INNS threat in the UK and the Overseas Territories. It is essential that EU funds for INNS biosecurity and management are replaced domestically following a UK withdrawal from the EU.

Q6. How can the risk of trade and future trading relationships bringing non-native invasive species to the UK be mitigated?

26. Changes to international trading patterns following a UK withdrawal from the EU are likely to increase the threat that the UK faces from INNS. It is essential for the UK's future ecological and economic prosperity that strong and coordinated biosecurity provisions are considered integral to any new UK trade deals. However, against the backdrop of inadequate capacity and resourcing, and a failure to implement existing INNS biosecurity legislation, Link remains concerned that the UK will, with current resources, be unable to manage the novel INNS biosecurity risks that changing trade patterns present.
27. Future trading agreements need to weigh up the benefits of the proposed trade, especially if it concerns live wild animals, and the potential damage they can do if released into the wild. The accidental importation of species that may arrive undetected as stowaways with other produce must also be considered. Opening up new trading routes increases the numbers of potential pathways for such stowaways, and there is no Government agency that has responsibility for this matter.

Q7. How effective have the European Union's Invasive Alien Species Regulations been at addressing and tackling invasive species?

28. Link is concerned that the functions and principles of the IAS Regulation will not be fully and effectively maintained following a UK withdrawal from the EU. The EU IAS Regulations are the only EU biosecurity legislation specifically focused on INNS. This legislation is unique as it implements biosecurity measures for organisms which primarily negatively impact nature, albeit with potential secondary economic and/or social impacts, as opposed to other EU biosecurity legislation which does not apply to organisms which only or primarily impact on nature.
29. The IAS Regulations are commendable as they place emphasis on the 'prevention is better than cure' principle.
30. They also emphasise the 'polluter pays' principle in relation to INNS releases and remedial action, to promote prevention via deterrence of deliberate releases.

31. The IAS regulations require member states to put in place pathway action plans and management measures within a set timeframe, however the UK Government have missed these deadlines.

Q8. In the event of EU exit, how should the UK establish its replacement for the European Commission's scientific forum to update the species list of concern?

32. Following a UK withdrawal from the EU, the UK would potentially have sole control over what species are included on the IAS List in the UK. This potentially presents an opportunity to improve UK biosecurity, by rapidly increasing the number of species included on the List.
33. If the UK does not remain part of the EU system, the process for including or removing species on a list of restricted INNS will need to be replicated domestically following a UK withdrawal from the EU. This would require bodies which undertake risk assessment and risk management to be placed on a statutory footing for the first time, along with the provision of effective secretarial support.
34. Without the co-ordinating function of the EU, Link is concerned how INNS biosecurity and management actions will be co-ordinated across Great Britain and the island of Ireland, including for those species not yet on the IAS List.
35. Although the UK Government has committed to retaining a list of restricted INNS in domestic law via the EU Withdrawal Bill, it has yet to clarify the process by which species will be included or removed from that list in the future. This list must be dynamic to address new and emerging INNS threats, and there must be coordination across the devolved administrations. The current EU system for modifying the IAS List is rigorous and transparent in relation to risk assessment and risk management respectively and complies with WTO rules on restricting trade. An equivalent system will need to be replicated in domestic law and must remain independent of government. A lack of a defined review period could also result in an irrelevant and infrequently updated list, as is currently the case for species listed under Section 14 of the Wildlife & Countryside Act or Article 15 of the Wildlife (Northern Ireland) Order 1985.
36. We seek assurances that short-term economic interest will not be pursued at the expense of long-term biosecurity considerations, and that any changes to a domestic IAS List will always follow a system at least as rigorous as the current EU system.

Q9. How should the UK work with the European Commission and others internationally to reduce the risk of invasive species?

37. Populations of established INNS regularly expand across political boundaries into one or more Member States including the UK. Co-operation between nations is essential for the effective implementation of INNS biosecurity and management measures.
38. The EU IAS Regulation applies only to Member States and there are currently no provisions for non-Member States to engage with it – this includes European Economic Area Members. Following a withdrawal from the EU, the UK would still be able to independently maintain at least the same or higher standards as the EU IAS Regulation. Maintaining the same standards as the EU will be needed for UK co-operation with Member States, regardless of

what formal mechanisms for UK-EU engagement are developed. It's also important that we keep pace with developments in Europe.

39. The main mechanism for the communication of INNS biosecurity information between European Governments is the Information Support System of the IAS Regulation which facilitates the exchange of information between Member States on the detection of INNS biosecurity threats. The UK's European climate and extensive international trade with the EU means EU Member States are a major source of INNS in the UK. As no other dedicated intergovernmental mechanism exists, the UK is reliant on the EU for formal communication of pan-European INNS biosecurity threats. If the UK does not retain access to this system, or if a similar system is not put in its place, the UK will be reliant on informal communication between government officials following withdrawal – a process which is likely to be neither rigorous nor timely.

40. There is no explicit provision within the text of the IAS Regulation for non-Member States to be a part of the Information Support System, the IAS Committee, or the IAS Scientific Forum. However, Article 22(2) states '*Member States shall, when complying with their obligations under this Regulation, endeavour to cooperate with third countries, as appropriate*', albeit the mechanisms and scale of this cooperation are not detailed. Therefore, it is unclear whether the UK would be able to maintain formal communication with EU Member States over INNS biosecurity issues.

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