

Wildlife and Countryside Link response to the GB Strategy Review

June 2014

Wildlife and Countryside Link (Link) brings together 44 voluntary organisations concerned with the conservation and protection of wildlife and the countryside. Our members practise and advocate environmentally sensitive land management, and encourage respect for and enjoyment of natural landscapes and features, the historic and marine environment and biodiversity. Taken together our members have the support of over 8 million people in the UK and manage over 750,000 hectares of land.

This response is supported by the following nine organisations:

- Amphibian and Reptile Conservation
- Buglife – The Invertebrate Conservation Trust
- The Mammal Society
- Plantlife
- Royal Society for the Protection of Birds
- Salmon & Trout Association
- The Wildlife Trusts
- Wildfowl & Wetlands Trust
- Woodland Trust

Invasive Non-Native Species (INNS) pose a major and on-going threat to our native flora and fauna. A coalition of Link members, formed to progress action on INNS, has prepared the following statement in response to the release of the *GB Strategy Review – main findings and recommendations*:

The review of the GB Invasive Non-Native Species framework Strategy must be commended for its thoroughness, for highlighting the successes and failures of the strategy, and for making a number of clear and justified recommendations for the future. It is encouraging to see the thoughts expressed and discussions developed by stakeholders during the Defra workshops in 2013 acknowledged in the findings and recommendations.

Key areas we are particularly supportive of are:

- A more focused role of the Programme Board at a strategic level.
- Reinvigoration of the England Working Group, with a focus on delivery, clear terms of reference and strong NGO/trade presence.
- Open and transparent decision making, including a reinvigorated stakeholder sounding board.
- Development and implementation of Pathway Action Plans for priority pathways in partnership with relevant trade and NGO partners.
- Demonstrable join up between risk assessments, risk management and policy decisions that are clearly communicated.
- Development of a clear process for horizon scanning.

- Better resourcing of early detection, surveillance, rapid response and contingency planning.
- Delivery of priority ISAPs in partnership with stakeholders and the development of ISAPs for those species identified as high risk by relevant mechanisms.
- Work to support LAGs and ensure they are focusing on priority areas and issues and effectively utilising available resources.
- A review of the Media and Comms group.

Those areas we are concerned about are:

- Schedule 9 – the review found Schedule 9 to be fit for purpose. While Section 14 of the Wildlife and Countryside Act 1981 itself may be, we feel the process for getting species onto Schedule 9 is inefficient, excessively lengthy and lacks transparency. A mechanism is needed for emergency listing. We also feel that Section 14 is not enforced. Schedule 9 is populated by invasive non-natives and natives – perhaps they need to be subdivided to reflect this and reduce confusion.
- Resources – the issue of adequate resources needed to fund the strategy must be addressed. A cost benefit analysis, taking full account of long term and cumulative impacts, should be carried out. While the importance of invasive non-native species work must continue to be highlighted at Government level to secure sufficient funding streams.
- Ballast Water Convention – there is still considerable reluctance to the UK ratifying this convention. While we hear there are difficulties in delivering the requirements of the convention should it be ratified, we want to see sufficient importance placed on finding solutions to these problems in order for it to be ratified and the threat from this priority pathway reduced.
- GB Islands and UK Overseas Territories (UKOTS)/Crown Dependencies – we feel these areas are not currently being adequately addressed. They support a large proportion of the UK's biodiversity, yet get little to no funding and limited resources. The recommendations in the review are not enough and we should look to provide expertise to support them. As well as evaluating the best use of resources and developing action plans together with the responsible agencies/departments in UKOTs/Crown Dependencies. Although mentioned in the findings, GB islands are not reflected in the recommendations. We believe the strategy has a role to play in identifying barriers to island eradication and restoration, and identifying species which are high risk to islands but that are not high risk on the UK mainland. We would like to see risks to islands included separately in risk assessments and the GB Non-native Species Secretariat working with NGOs in identifying priority island eradications.
- Issues covered by the Programme Board need to be properly communicated to stakeholders. Closer partner involvement at a strategic level would pay significant dividends in delivery of the strategic aims of the strategy. A 'sounding board' role with an annual forum will be insufficient to optimise NGO input.

- In order to ease implementation of the EU IAS Regulation *Article 12 – Invasive alien species of Member State Concern*, the Strategy should include creation of a national list of invasive alien species of GB concern.

This review of the strategy will hopefully pave the way for more effective and coordinated work around the issues of INNS at a GB level. Link members will continue to support and feed into the strategy.



Wildlife and Countryside Link
89 Albert Embankment, London, SE1 7TP
W: www.wcl.org.uk

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