

Defra Invasive Alien Species Policy Team

*By email*

Monday 14th March 2022

To whom it may concern,

**Re: Comprehensive Review of Species of Special Concern**

Wildlife and Countryside Link is a coalition of 65 organisations working for the protection of nature. 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 Working Group brings together eNGOs to address issues associated with invasive non-native species in the UK, through both practical intervention and appropriate legislation. The Group advocates these solutions to decision makers, practitioners, and the general public. We welcome this opportunity to share our reflections on the Comprehensive Review of Species of Special Concern.

The threat posed by invasive non-native species (INNS) both within the territory of Great Britain, and beyond, is significant and growing. INNS are one of the top five drivers of biodiversity loss and species extinction globally, implicated in 58% of the 247 global animal extinctions where the cause of extinction is known.<sup>1 2</sup> They are estimated to cost the UK economy at least £2 billion each year, through impacts such as damage to and loss of crops, increased flooding risk, and additional building and construction costs.<sup>3</sup>

The severity of these impacts will only increase as new INNS are introduced, and as those already established expand their range. The latest UK Biodiversity Indicators report shows that the number of INNS established in Great Britain has consistently grown since 1960, across freshwater, marine and terrestrial environments.<sup>4</sup> This will be further exacerbated by the effects of climate change, as warmer conditions and ecological disruption assist species introduction and establishment.

The Comprehensive Review of Species of Special Concern must reflect the severity and scale of the threat posed by INNS. We would be deeply concerned by any approach taken on the basis that a delisted species could simply "be re-added" to the list, if later found to pose a risk. Preventing the introduction and establishment of invasive non-native species is critical to managing the threat they pose, both more effective and efficient than management and attempted eradication of established species.<sup>5</sup> The precautionary principle should therefore be followed in this review. If there is any risk

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<sup>1</sup> IPBES Global Assessment, 2019 - <https://ipbes.net/global-assessment-report-biodiversity-ecosystem-services>

<sup>2</sup> Bellard C, et al. (2016). Alien species as a driver of recent extinctions. *Biology Letters*, 12: 20150623.

<sup>3</sup> Wildlife and Countryside Link, 2020 - [https://www.wcl.org.uk/docs/Prevention is Better than Cure Report 2020.pdf](https://www.wcl.org.uk/docs/Prevention%20is%20Better%20than%20Cure%20Report%202020.pdf)

<sup>4</sup> <https://jncc.gov.uk/our-work/uk-biodiversity-indicators-2021/>

<sup>5</sup> Wildlife and Countryside Link, 2020 - [https://www.wcl.org.uk/docs/Prevention is Better than Cure Report 2020.pdf](https://www.wcl.org.uk/docs/Prevention%20is%20Better%20than%20Cure%20Report%202020.pdf)

that a species could introduce, establish and become invasive in Great Britain, the species should not be delisted.

A number of Species of Special Concern have been considered unlikely to be able to establish under the 2050 climate scenario, but moderately likely to establish under the 2100 scenario. The proposal to delist these species will allow them to be resold to the public, enabling a high, unmonitored number of these Special Concern populations to establish in gardens, ponds and other locations across GB. These could become source populations for establishment in the wild. Due to the high number of source populations, relisting a species at this stage would be ineffective at preventing the establishment of these species, resulting in a reactive rather than proactive approach to INNS management.

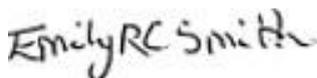
The risks of not taking a precautionary approach are exemplified in the case of pacific oysters. Pacific oysters were introduced to the UK in the 1960s, given the presumption that UK water temperatures were unsuitable for them to reproduce and therefore that they did not pose a risk. However, warmer conditions owing to climate change are now facilitating population explosions. Pacific oysters have since spread and established across southern England and Wales, displacing native oysters and damaging Marine Protected Areas and important estuarine habitats.<sup>6</sup>

The UK is one of the most nature-depleted countries in the world. In the midst of a nature crisis, where the threat posed by invasive non-native species is only increasing, a focus on delisting species is the wrong approach. Instead, this review should focus on establishing a comprehensive UK list of species of concern, which reflects the scale of the threat invasive non-native species pose to UK biodiversity and the economy. Other countries such as New Zealand have a 'white-list' approach, with non-native species assumed to present a threat unless a scientific risk assessment demonstrates otherwise.

With thousands of alternative native and non-native species, the proposal to remove any of the 66 species that have been assessed to present a risk, and could establish under future climate scenarios is nonsensical. At a minimum any species that shows a likelihood of establishment under the 2100 scenario should not be delisted, but we urge strongly that none of the species currently listed on the Species of Special Concern should be removed.

We would be pleased to discuss any of these points further.

Many thanks and best regards,



Dr Emily Smith  
Chair, Link Invasive Non-Native Species Group, Environment Manager, Angling Trust.

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<sup>6</sup> <http://publications.naturalengland.org.uk/publication/4889256448491520>