

Pathway Action Plan consultation response

18th August 2025

This response is on behalf of nature and animal welfare coalition Wildlife and Countryside Link ([Link](#)).

Overarching comments

Link welcomes the long-awaited publication of this consultation. It is an important step to consolidating the action plans and promoting the importance of preventing and managing invasive non-native species (INNS) amongst targeted groups. For the Pathway Action Plans (PAPs) to have the most success there are some overarching comments we wish to make that do not fit within the consultation questions.

Once finalised and published, the PAPs must not be considered to be a completed task. They are designed to drive the action needed to meet the GB Strategy 2023-2030 objectives¹ but currently many actions across the plans are unmeasurable, lack a deadline to be completed by and rely on voluntary participation from those involved in relevant activities or responsible for wildlife management and enforcement. All actions should be reviewed to be measurable and timely, and working towards increasing the number of listed species of special concern. The GB Strategy set a target to '*complete the suite of PAPs for priority pathways, ensuring that they are delivered and resourced*', and so there should be resources and a budget dedicated to this process after publication.

Each PAP working group has a goal to meet to discuss the plan, but there is a misalignment in meeting frequency between groups. There should be a uniform process for each PAP group to be re-convened by the NNSI at least every six months, and the notes from this review should be made publicly visible to improve accountability and information sharing.

As a number of PAPs were written up to five years ago, we would expect progress to have been made towards the actions in these plans. The lessons learnt from the preliminary progress of the plans should inform the review of the actions in this consultation, building on and strengthening actions to move beyond what has already been achieved. Since the Non-Native Species Inspectorate was not in place when some of the PAPs were drafted (boating,

¹ <https://www.nonnativespecies.org/assets/Uploads/The-Great-Britain-Invasive-Non-Native-Species-Strategy-2023-to-2030-v2.pdf>

angling and zoos), it is important that relevant actions are added to these plans to include the workings of this relationship. To complete their role to the fullest, the NNSI should have additional powers to allow them to check for INNS at the border. It is also crucial that all invasive species taxa are captured by legislation that would allow them to be contained at the border. Currently there is a grey area for non-listed invasive animal species such as flatworms who are not covered by the remit of the PHSI, and the actions of the NNSI are limited.

Additionally, the PAPs should be reviewed and treated collectively. Since they were created by independent working groups they do not look like a joint package. Multiple plans are likely to be relevant to the same user and so they should be coherent, linked, and formally designed with matching style, branding and language. The latest PAP to be developed is the Pet PAP which has stated alongside each action the objective(s) to which it is relevant. This provides a clear line of sight between actions and objectives which is lacking in the other PAPs. If the other PAPs were to be revamped to incorporate this format it would show when there are objectives that are not covered by any or sufficient relevant actions.

A significant issue of INNS prevention in the UK is the slow process for Ministerial decisions to be made. On 17th July the EU added a further 26 species to their list of special concern on top of the additional 22 species that were already added since Brexit, bringing the new EU list to a total of 114 species while the UK remains stagnant on just 66. The process of listing species must be reformed and precautionary to be effective. Link has previously suggested that a countdown of 2 years is launched for a Ministerial decision to be made when a species risk assessment begins. The PAPs should all have an objective for the working group to contribute to decreasing the timescale of this process via an appropriate action, for example, collecting and passing data and concerns to the NNSI and the NNSI regularly to contribute to species risk assessments.

Recreational boating PAP

Q8. Are you content with the actions within this PAP?

No

Q9. If no, what do you think could be improved?

- **missing action**
- **action could be improved**
- **missing text**
- **text could be improved**
- Other

Q10. Please provide details of the changes you would make to this PAP or anything else you think is important.

This PAP is significantly longer than the others and spans across thirty pages. To have the greatest impact the text should be revised and shortened across the document to be as succinct as possible. The detailed '*biosecurity guidance for boat users*' and the '*code of conduct*' should be separate standalone documents which the PAP references and links to (as with the Zoos PAP). In line with the other PAPs, the rationale section should be shortened to include a few short paragraphs of the basic context of the biosecurity risk of boating activities, a brief summary of the legislation involved, and the importance of Check Clean Dry and cooperation. For example, the paragraphs on Check Clean Dry do not need to include the history of the campaign as it is now a well-known campaign. The '*key actors*' section should be moved to the bottom of the document.

Wind Foiling should be added to the scope of the plan. An action should be added to the '*Biosecurity at the border and international cooperation*' section for the UK Government to grant the Non-Native Species Inspectorate (NNSI) the power to search for invasive non-native species at the border, checking boating equipment (amongst other high-risk imports such as angling and horticulture products). This is not a power they currently have so they must rely on the powers of the Plant Health and Seed Inspectors (PHSI) to conduct searches, but invasive animal and invertebrate species, such as flatworms, are falling through the gaps as their powers do not fully cover them.

There should be an action in the PAP and the '*code of conduct*' to develop a functioning partnership between organisations in the same water catchment to educate water users about good biosecurity and ensure a joined-up approach, like the Catchment Based Approach (CaBA). This should also include linking to other relevant PAPs like Angling.

Within the '*code of conduct*' there should be an explicit duty on boaters to report suspected INNS sightings and escalate them appropriately, informing the site manager. In the PAP this is listed as an aspiration in the '*background*' section and places the responsibility on managers and landowners of sites rather than on boaters themselves. By placing a duty on boaters, the process and speed of reporting and response could be improved.

Annex 7 should be updated following the 2025 horizon scanning results and reviewed again after any future horizon scanning exercises. Descriptions should be added for species without a common name.

Angling PAP

Q11. Are you content with the actions within this PAP?

No

Q12. If no, what do you think could be improved?

- **missing action**
- **action could be improved**
- **missing text**
- **text could be improved**
- Other

Q.13 Please provide details of the changes you would make to this PAP or anything else you think is important.

Like the Boating PAP, there should be an action in the plan and the '*code of conduct*' to develop a functioning partnership between organisations in the same water catchment to educate water users about good biosecurity and ensure a joined-up approach, like the Catchment Based Approach (CaBA). Additionally, behaving in accordance with the River Basin Management Plan should be added.

The actions should be ranked by priority level and given timeframes to be delivered and monitored by a responsible body. The plan mentions that many actions are common or complementary with other PAPs like Boating, but it does not explain how these may be joined up. It would be beneficial for both plans to be reviewed together to explore the important links.

The Angling PAP was developed before the NNSI was established. An action should be included within the Angling PAP which accounts for the actions of the NNSI to raise awareness of Check, Clean, Dry, both at the border, and through activities within GB. An action should also be included to ensure the NNSI have the power to search for invasive non-native species at the border on angling equipment.

There could be some enhancements and strengthening of specific actions within the Angling PAP. These include.

- Action 5: Since the Angling PAP was developed, the Environment Agency has transitioned to digital licences and no longer offers physical rod licence cards. To deliver Action 5 and ensure the Check, Clean, Dry messaging continues to be promoted

to the angling community, we recommend that the logo, or wording is added to the digital email version of the rod licence.

- Action 10A: the addition of ‘providing high-risk angling kit such as nets, mats and slings that remain on site’. By providing angling equipment on site for anglers to use, this will reduce the threat of invasive species being moved on, or from, the site and represents a further example of biosecurity best practice
- Action 11: amendment from ‘promote the EU Code of Conduct’ to ‘promote the GB Code of Conduct’. A GB code of conduct was developed during the production of the Angling PAP and is the one promoted by the Angling Trust. Further wording should be added to this action to state ‘encourage other EU member states angling organisations to promote the EU Code of Conduct and adopt the CCD...’
- Action 14: The Cefas draft comprehensive assessment of the risk posed by moving bait associated with marine angling was presented in 2020. It is recommended that this action is amended to implement the recommendations of the report. It is also recommended that a code of conduct for bait digging is developed to promote best practice to the angling community.

URLs need to be added to Annexes 4 & 5 with a hyperlink added in the online version of the plan to take users to the relevant documents directly. Annex 6 should be updated following the 2025 horizon scanning results and reviewed again after any future horizon scanning exercises. Descriptions should be added for species without a common name.

Horticulture PAP

Q14. Q11. Are you content with the actions within this PAP?

No

Q15. If no, what do you think could be improved?

- **missing action**
- **action could be improved**
- **missing text**
- **text could be improved**
- Other

16. Please provide details of the changes you would make to this PAP or anything else you think is important.

The statistics and figures used in the ‘*Rationale*’ section are from 2018 and should be updated with more current figures. This would allow the NNSS to reassess how understanding of

BePlantwise has changed, with the hope that awareness has improved beyond 7% of the general public. It would be even more important to know if awareness of this campaign had not improved to inform communication strategies going forward.

Link broadly agree with the 'Aims and Objectives' section for invasive plant species, but believe they should be strengthened by the following changes:

- In the first paragraph of this section, the word '*in*' should be added next to '*on media*' to read, '*in or on media such as soil*'. This would account for pests, pathogens, and soil-dwelling species that may not be present on the surface.
- (Objective 2) add '*before they become an issue in the wider environment*'.
- (Objective 5) add a goal to encourage communities to report and remove invasive plant species in the wild (in addition to preventing planting of invasive species).
- Objective 6 needs further clarification. In order to fully minimise the risk of contamination of horticulture plants and associated horticultural products entering GB, either extensive means of checking all soils must be brought in, or the importation of soil and growing media must be prohibited, a biosecurity measure successfully adopted by other nations. We suggest that a similar objective is added to "improve the UKs domestic horticulture supply to reduce the reliance on imports, which in turn would reduce the risk of hitchhikers."
- Add an objective to "*proactively identify and prevent INNS plants from establishing before they have the opportunity to cause harm.*"
- Add an objective to "*work with local authorities to make disposing of garden waste easier and free to prevent fly tipping which can facilitate the spread of potentially invasive plants into the wider environment, including the development and delivery of effective communication of the dangers of fly tipping garden waste.*"

There are a number of actions that should be updated and new actions to be added. We note that there are currently no measurable targets assigned to the actions.

Add Action 1A for Defra to pursue a way for the NNSI and PSNI to investigate all unregulated markets online, including Meta (Facebook Marketplace) which has a wealth of unregulated plant/animal sales. Defra should investigate the feasibility of providing the NNSI with powers to trace and recover plants from consumers if they were sold an illegal invasive product. To support greater compliance among the horticulture sector, the NNSI should employ an Industry Engagement Officer, much like APHA have for their work which has been effective at reducing non-compliance.

There is a significant INNS risk evolving with the UK-EU reset agreement as plant inspections at the border are due to be reduced, reducing available data of pest and pathogens in imports to inform the PHSI and NNSI targeted checks. The actions relating to this (1, 10 & 11) need to be rewritten to account for the change and a new action created to replace the data being collected at the border. Without active monitoring at the border there will be no way of knowing which imports pose greater risk of carrying pests or pathogens.

Action 2 should incorporate regular working with colleagues in Northern Ireland and EU Member states, particularly at the EU are making significant progress to listing new species.

Action 3 needs to be prioritised with a strict delivery timeline and combined with action 12 to reduce repetition. As stated at the beginning of this document, Link has previously suggested that a countdown of 2 years is launched for a Ministerial decision to be made when a species risk assessment begins.

We recommend that Action 4 is improved in a number of ways. A method should be developed for monitoring novel horticultural species and assessing their invasive potential. This is increasingly important as consumers and traders are looking at new species for climate resilience plants, following frequent periods of drought across the country. Action 4A assumes that the horticulture sector will volunteer this information and report it (Action 4B), but that is not likely to be the case across the board as it does not benefit the horticulture sector to close sales of certain species. Instead, working with APHA, there should be a strict duty placed on the horticulture industry to report species with invasive potential, and a sub-action for Government departments to work together to improve understanding of the best way to incentivise reporting of horticultural plants that have invasive potential to 'Plant Alert'. Action 4b should remove 'ornamental' as a requirement and instead any non-native plant displaying invasive behaviour should be reportable. If 'Plant Alert' is selected as the best reporting mechanism, its functionality should be improved to allow for a rapid response to a new report. Tree Alert is a great example of this as the reports go directly to Forest Research who have the authority to take action.

Action 6 is broadly a positive move to raise awareness among gardeners that they should consider which plants they use in their gardens. However, labelling alone should not be relied upon and it is instead the act of banning species showing invasiveness which is the answer to preventing their spread into the wider environment. *Rhododendron ponticum* is an excellent example as to why the process of listing species of concern must be reformed as it is sold despite that its invasive properties and the damage already being done to woodland environments are well understood. This poses a poor value for money for the Government as



Defra offers financial grants to land managers for the removal of rhododendron from woodland habitats while the plant is still permitted to be sold to the public. This also links back to objectives 2 and 3, ensuring invasive plants are removed from trade, and are correctly labelled, as often the full species name is not included on rhododendron plants making it impossible for consumers to avoid planting rhododendron ponticum.

Strengthen Action 14 by setting an additional goal to improve industry knowledge of how to identify hitchhiking taxa in addition to what to do should they find it. This could include funding training and making it mandatory for a member of staff at all horticulture sites to have completed it. There will be nervousness about business impacts of reporting, so working with the industry to determine a process, and incentives for doing so, is vital for this to be effective.

In line with the other PAPs, the ambition for the working group to meet annually is not frequent enough. Considering the costly and widespread impact of invasive plant species and the reduction in border checks with the new UK-EU SPS agreement, Link would like this to be raised to at least 3 meetings a year.

Zoos PAP

Q17. Are you content with the actions within this PAP?

No

Q18. If no, what do you think could be improved?

- **missing action**
- **action could be improved**
- **missing text**
- **text could be improved**
- Other

Q19. Please provide details of the changes you would make to this PAP or anything else you think is important.

The PAP needs significant rethinking as the majority of the actions (1-3, 5,7,8) are to send, publicise or slightly amend guidance. Since the PAP was developed in September 2020, many of these actions should have been completed (particularly 6,8,9 and 10) and could either be kept on the plan with a timeframe to repeat the actions annually or be removed or updated. The remaining actions should be re-sorted according to the priority.

As the new Standards for Modern Zoos have been published², Action 7 must be refreshed to reflect the changes. The Defra Zoo Policy Team may develop new training for zoo inspectors in light of the standards, and the new training should be closely aligned with the PAP actions. Zoos must adhere to the Section 8 of the Standards of Modern Zoo Practice for Great Britain in relation to INNS and provisions to prevent and report escapes. Until these Standards come into force, in May 2027, zoos must notify the relevant statutory nature conservation agency (Natural England, Natural Resources Wales or NatureScot) as soon as possible when an escape occurs and, in any case, no later than 24 hours following the determination that an escaped animal's location is no longer known and that the animal is considered potentially to be alive.

An action to follow biosecurity protocols that prevent the spread of disease from water or waste should be added. If unprevented, disease could contaminate or transfer to native species in the environment outside of zoo enclosures. The risk of transfer of infectious disease such as chytridomycosis in amphibians or snake fungal disease should be considered by all herpetological collections. Biosecurity practice should take into account risks related to other taxonomic groups and link directly to UK Government guidance with regard to notifiable diseases in animals (including birds). The advice should be updated in an annex to the document as more information on risk becomes available.

URLs need to be added to Annexes 2-5 with a hyperlink added in the online version of the plan to take users to the documents directly. Annex 2 (p.2, third bullet point under Containment) should be rewritten to be clear that only vegetation with invasive potential that could escape should not be included in an enclosure.

Pets PAP

Q20. Are you content with the actions within this PAP?

No

Q21. If no, what do you think could be improved?

- **missing action**
- **action could be improved**
- **missing text**
- **text could be improved**
- Other

Q22. Please provide details of the changes you would make to this PAP or anything else you think is important.

²

The pets PAP should have a greater focus on identifying potentially invasive species and on preventing their establishment in the first place. While Action 5 identifies the need to propose further species for listing as species for special concern, a positive list of species that can be traded as pets, based on them being assessed as very low risk for invasiveness (among other criteria), would provide a far more precautionary approach and should be considered.

It should be noted that while the Pet PAP states: *“Pets are obtained from a variety of sources including local pet shops, family and friends, breeders, aquatic shops, specialist hobby organisations and the internet. Many of these sources can help to educate new owners on responsible ownership (for example, promoting the ‘no release’ message)”,* the availability and/or quality of the information currently provided varies enormously. Actions 4 and 6 should include a clear plan for ensuring that the provision of consistent and high-quality information to potential pet owners is a requirement for those trading in pet animals, and that species considered high risk should not be traded or kept.

Preventing further escapes remains crucial but clear guidance of what to do with managing species already present is no less important. A number of species with populations in the wild, including non-native crayfish and amphibians such as alpine newt or marsh frog, can be found in ponds or caught accidentally, and guidance for the next course of action for members of the public including homeowners is limited. An action should be added to work with Natural England and veterinarians to develop legal guidance which would clearly set out the process of responding to invasive non-native pet escapes found in the wild, including clarity on whether a garden pond qualifies as a ‘wild’ environment and the correct process for humane euthanasia of non-native animals that are removed. Captured animals are frequently unable to be rehomed and there should be specific advice about how to euthanise humanely whilst ensuring animal welfare is maintained and professional codes of practice such as those applied by veterinarians are considered.

Wildlife and Countryside Link (Link) is the largest nature coalition in England, bringing together 90 organisations to campaign for nature, climate, animal welfare and a healthy environment for everyone. Wildlife and Countryside Link is a registered charity number 1107460 and a company limited by guarantee registered in England and Wales number 3889519.

For questions or further information please contact:

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The following organisations have inputted into and support this response:

Peoples Trust for Endangered Species

Angling Trust

Froglife

RSPCA

Born Free

Buglife

Woodland Trust

The Wildlife Trusts

Amphibian and Reptile Conservation

The Rivers Trust