

## An analysis of the Invasive Non-Native Species Framework Strategy for Great Britain

### A. *Invasive Non-Native Species (INNS) programme governance*

A clear, appropriate governance model for our collective INNS work is essential; currently, there is a general lack of clarity over who is responsible for what amongst key stakeholders with regards to INNS. For example, in relation to the development of Pathway Action Plans, some aspects of communications and the collective goals are unclear. The INNS Programme Board, developed as part of the GB Secretariat to address INNS issues, needs to re-establish clear lines of responsibility so that planning can take place and resources can be allocated or re-assigned to the relevant stakeholders, and if need be across different government departments.

#### Specific recommendations for programme governance:

1. The INNS Programme Board must be serviced by the most relevant senior civil servant, and tasked with direct and regular reporting to the responsible Minister. It must foster strategic communications, awareness and corresponding action among other government departments, especially where pathways and necessary actions lie outside Defra's direct influence.
2. The INNS Programme Board must take responsibility for the strategic development of INNS policy, providing a clear mandate for future action that is more orientated towards preventative measures.
3. The England Working Group should be re-established if it can enable the INNS Programme Board to focus on strategic issues; the Working Group could be modelled on the structure of the INNS Working Groups in devolved countries.
4. The establishment of an 'Invasion Biology' group should be considered, to address gaps in knowledge about how species evolve into different niches under different circumstances, or are likely to in the future, as well as keeping up to date with developing technology.



Figure 1. Introduced North American bullfrogs have often been removed thanks to concerted action by government and volunteers (Amphibian and Reptile Conservation)

### B. *Regulation and enforcement*

We already have some legislative tools at our disposal that can help to prevent INNS from becoming a problem, but these are poorly utilised. Existing legislation needs to be harmonised right across the UK, and be ready to take on board any changes likely to arise from new European legislation; the recommendations offered by the Law Commission consultation on wildlife law could help to deliver this. Developing legislation that is fit-for-purpose is in the UK's best interest, to help defend against the spiralling economic and ecological costs associated with INNS, many of which arise from inaction elsewhere.

### Specific recommendations for regulation and enforcement:

1. Existing powers to control INNS need to be used more effectively (for example, the ability to ban sale, and greater enforcement against those who deliberately release INNS into the wild). This would be facilitated and complemented by greater communication between the various relevant bodies, and an additional provision right across the UK for species control orders and emergency listing.
2. The Ballast Water Convention should be ratified as soon as technically feasible.
3. There should be greater alignment between INNS regulations across the different devolved countries, following the Scottish regulatory model which allows, for example, a white list approach.
4. An appropriate balance must be struck between the use of voluntary action (e.g. codes of practice) vs. regulatory action (e.g. ban on sale), which is guided by clear evidence and feedback, and identifies a proportionate response which is fit for purpose.
5. The new EU Invasive Alien Species Directive should be transposed as soon as technically feasible. The NGO community is deeply supportive of the need for EU legislation and is prepared to help create a supportive and enabling framework.

### C. Risk assessments, research and preventative action

While progress on the development of risk assessments, horizon scanning and some action planning has been good, we believe there is a general lack of focus on how assessments and plans lead to clearly defined outcomes for species. There is also insufficient focus on preventative measures throughout the GB approach to INNS. A fundamental shift towards preventative measures is needed, and is likely to deliver the most cost effective outcomes. This needs to be heavily complemented by effective horizon scanning.

#### Examples:

1. We need risk assessments for all INNS that have entered, or are highly likely to enter the UK, and all those that fall into the high risk category should have an associated action plan. There may be a need to make the development of risk assessments and invasive species action plans mandatory, and to ensure that they are updated in light of new information about how species are evolving.
2. It is a major oversight that no Pathway Action Plans (PAPs) have yet been developed, despite some clear evidence detailing how some species are entering the country. A programme of PAP development must begin as soon as possible for those species whose pathways are already identified, with a programme of research to better clarify the pathways for other particularly problematic species, from which PAPs can be developed.
3. There is a great deal of promising research in progress, upon which the successful eradication of many established species is likely to hinge. It is important that such research is completed and results implemented, and that this is enabled by a sufficient guaranteed funding.



Figure 2. *Crassula spp.* survey and clearance at Little Sea (National Trust)

### Specific recommendations for risk assessments, research and preventative action:

1. Effective and continuous horizon scanning is key to developing, guiding and deploying a more preventative approach. It should be an on-going process that is resourced accordingly.
2. The current programme of 'plan development' should be simplified and harmonised as far as possible to reduce bureaucracy, thereby providing a one-stop guide to evidence for the necessary action. This should be outcome-focused, with clear lines of responsibility outlined.
3. Consideration should be given to the scope for Local Action Groups (LAGs), and indeed the NGO community, to explore innovative solutions to INNS and to undertake field trials to test the efficacy of new solutions.

#### **D. Managing INNS - rapid response, control, eradication and mitigation**

There are some good examples of local management interventions co-ordinated by government in recent years, such as those for Water Primrose and North American bullfrog eradication. More interventions are desirable, yet clearly extending such action to a wide range of species without prioritisation could result in the ineffective use of resources. There needs to be a better and more transparent decision-making process for how interventions are prioritised, confirmed, funded and delivered. In all cases, systems need to be flexible to allow interventions to proceed rapidly. Even short delays can considerably increase eradication costs and decrease the chance of success.



Figure 3. Clearing Rhododendron (National Trust)



Figure 4. Clearing Himalayan Balsam (The Wildlife Trusts)

#### **E. Monitoring, surveillance and research**

A more strategic and proactive approach to monitoring and surveillance is needed, so that the information gathered supports the Invasive Non-Native Species Framework Strategy for Great Britain (the 'GB Strategy') in an efficient and cost-effective manner. This should seek to achieve key data needs, notably: tracking distributions of key INNS already present in Great Britain; vigilance for key species that have yet to arrive; and mapping and evaluating the impacts of INNS. This strategic approach should integrate with and support existing recording schemes and data management systems. Importantly, there needs to be a proactive approach to data collection, rather than a passive one. INNS research also needs to address critical gaps in the evidence base. With the exception of some excellent overarching projects (e.g. the 2010 report on economic costs), a sound consideration of strategic needs has not always been evident in government commissions of INNS research.

## Specific recommendations for monitoring, surveillance and research:

1. Increasing public involvement in the monitoring of established and potential INNS is key to future success. Local Action Groups play a vital role, and should receive committed long-term funding. We also welcome the increased role that technological advances can play – such as Apps for Smart phones that allow the public to report INNS – providing these are not regarded as a substitute for other key preventative measures, and that data captured in this way are harmonised.
2. There should be an increased focus on research to support preventative measures, in line with the GB Strategy. A strategic approach to research will mean greater effectiveness and value for money. There also need to be stronger links with the academic community, to ensure that their research agendas align with the GB Strategy as far as possible. Liaison with INNS researchers overseas will also prevent duplication and maximise the value of research undertaken in Great Britain.

## F. Communications

Much of the current communications around INNS is very good, but it now needs to move up a gear in order to meet the challenges ahead. INNS communications must reach the wider public, who are increasingly at the vanguard of species detection initiatives, as well as targeting specific messages at key groups.

Communications need to be underpinned by the guidance of a high level and strategic communications group, with provisions for direct dialogue with all relevant NGOs. This group should be complemented by further efforts, across government, to increase awareness of INNS and their impacts. To deliver high quality future communications work – often cost effective in tackling aspects of INNS – there is a clear need to unlock funds from central government to support work and build on the successes achieved so far. If the Government continues to place barriers in the way of funding communications work on INNS, where it is most often needed and economically sensible, we will fail to achieve many of the outcomes on INNS that we collectively seek.



Figure 5. Adam Salmon, London Wetland Centre Reserve Manager clearing Water Primrose (*Ludwigia*), Jan 2008 (Wildfowl & Wetlands Trust)

## Examples:

1. The website run and maintained by the Secretariat to distribute information about INNS is very informative and highly useful to the sector, but it is at risk of becoming overly dense and would benefit from some simplification. We would like to see this resource developed further to include, for example, sign-posting to a range of other data sources (e.g. Delivering Alien Invasive Species In Europe - DAISIE) and an overview of the different streams of funding for INNS work.
2. 'Be Plant Wise' has been relatively successful at engaging many plant nurseries on the subject of INNS. It has spread the message to nurseries' staff and customers about how harmful some aquatic plant species can be, and how best to manage them accordingly. This initiative requires continued investment to build on its success, and an analysis of its

achievements so that future work can be more targeted. Such tailored action may need to focus on labelling issues and on raising awareness of the impacts of other harmful species which can escape via nurseries and become established. There is much scope for closer working with NGOs to maximise the dissemination of the campaign's key messages to the general public.

3. We applaud the 'Check Clean Dry' campaign, which was timely and has been highly effective in communicating simple actions to a target audience to stop the spread of INNS. This campaign needs to continue, evolve if necessary, and be given a stronger profile. Similar actions should be targeted at other groups, particularly where the link between spread and specific groups is clear.
4. There is much promise in the 'alert system', which was developed to inform people about, and thus help tackle, new invaders (e.g. Killer shrimp), and which can also stop the ongoing spread of particularly invasive species (e.g. Water primrose). It requires greater publicising in the future however, and Link members may be able to help here.

### Specific recommendations for communications:

1. The existing communications group needs to be reinvigorated and given greater profile.
2. A forum should be established to allow parliamentarians to gain insight into the impacts of INNS, and to help establish an enabling and supportive framework for any new European legislation. The new policy group established under the Biodiversity APPG would serve this purpose and Link members are prepared to offer the secretariat for this group.
3. Any existing blockages to funds that can support communications work for INNS should be removed.
4. There is substantial scope to exploit the public concern around Ash Dieback disease (*Chalara fraxinea*), which can provide a platform to increase awareness of risks from INNS to our natural and cultural heritage. Awareness could be developed through both media coverage and more structured approaches, such as the national curriculum. Simple resources could be developed which would support schools to promote understanding of INNS impacts, and create a route to link reported local observations of INNS to a national 'alien species' database.



Figure 6. Brockenhurst College clearing INNS at Warren Farm (The Wildlife Trusts)

### G. Local partnership working

Effective local action forms a critical component of tackling INNS. Rightly, action and funds have been previously directed to support local initiatives. We applaud the good work undertaken by many Local Action Groups (LAGs), and the investment and encouragement that the Secretariat and Defra have provided.

### Specific recommendations for local partnership working:

1. A commitment to long-term funding will secure the continued success of many of the LAGs (including a greater exploration of private sources of funding); groups should also be given an objective assessment of their success.
2. The establishment of an ‘umbrella group’ or framework for the LAGs should be considered, to better coordinate advice and learning across the groups.
3. The work of the LAGs should be highlighted within and complemented by action through, for example, Local Nature Partnerships and Nature Improvement Areas.



Figure 7. Himalayan Balsam pulling The Shallows (The Wildlife Trusts)



Figure 8. Himalayan Balsam pulling at Stile Pool (The Wildlife Trusts)

### H. Tackling INNS in the UK Overseas Territories

It is important that we complement our action to tackle INNS at home and across the UK with action in the UK Overseas Territories (UKOTs), many of which face chronic issues. We have seen a particularly good show of commitment from Defra through their funding of the RSPB’s project to prioritise vertebrate eradications. We recommend that the UKOTs biodiversity strategy (currently under development) should be mindful of the outcomes of this prioritisation project, and set ambitious targets which will ensure priority eradications are achieved.

This position paper is supported by the following 15 organisations:

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