

# CONSULTATION

## Response Document



43 Southgate Street, Winchester, Hampshire, SO23 9EH, UK

Tel: +44 (0)1962 868 626 | [enquiries@cieem.net](mailto:enquiries@cieem.net) | [www.cieem.net](http://www.cieem.net)

### **Management Measures for Widely Spread Invasive Alien Species (IAS) in England and Wales**

**(Department for Environment, Food and Rural Affairs &  
Welsh Government)**

**12 September 2019**

## Introduction to CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM), as the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland, welcomes the opportunity to comment on this consultation.

CIEEM was established in 1991 and has over 5,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme and best practice through the dissemination of technical guidance for the profession and related disciplines.

CIEEM is a member of:

- Environmental Policy Forum
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- United Nations Decade on Biodiversity 2011-2020 Network

# Comments from CIEEM

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## Introduction

We welcome the opportunity to participate in this consultation. We would be happy to provide further information on this topic. Please contact Jason Reeves (CIEEM Head of Policy and Communications) at [JasonReeves@cieem.net](mailto:JasonReeves@cieem.net) with any queries.

## Q1-5 About us information

### Q1. Would you like your response to be confidential?

No

### Q2. What is your name?

Amber Connett

### Q3. What is your email address?

[amberconnett@cieem.net](mailto:amberconnett@cieem.net)

### Q4. Who do you represent? You can tick more than one box.

Academia	Local action group
Animal rescue	Local Authority
Aquatic interests	Non-Government Organisation
Business Charity	Riparian Owner
Conservation body	Trade association
Farmer Forester/woodland owner/manager	University/research institute
Government agency	Utility supplier
Individual	Veterinarian Zoo
Land owner	Other (please specify)

**Other – Professional Body. Members include Academics, NGO staff, Land managers, Ecologists, Statutory Nature Conservation Body staff etc.**

### Q5. What geographic region do your responses relate to?

Both

**Q6. What are your views on the proposed aims for the management measures set out in Appendix A?**

**Plants (Table 1, Appendix A):**

In general, we do not agree with the management aim for plants. To reduce further spread, localised eradication should also be carried out in areas where the species has only just appeared, for example, American Skunk-cabbage is a target species in the Pembrokeshire Coast National Park for this reason. The following could also be included to expand this aim as follows:

- Control methods should be practical, effective and economically viable for a given situation or particular species of invasive plant.
- Qualified individuals should carry out eradication, with who developers, landowners, members of the public and land managers should consult with these, so that appropriate advice is sought, and that qualified individuals are undertaking eradication.
- There is a need for a rapid response which should include methods from preventing invasive species outbreak in the first place, therefore accelerating detection and response.

Additionally, as rare native flora are mentioned within the aim, it should specify what is recognised as rare flora, for example, plants are a distinguished feature of the SSSI designation, or a Schedule 8 plant is present (under the Wildlife and Countryside Act 1981) or Nationally Scarce Plants under the IUCN Red List.

There is an urgent need for a risk assessment tool for use at the local (as opposed to national) and site level. Those working on the ground and those paying for plant management, such as local authorities, businesses and developers, will not be able to achieve effective control without effectively assessing risk which will inform decision making.

**Animals (Table 2, Appendix A)**

For all species, management measures aimed at widely spread animal species should include an awareness raising programme to help the public understand why the measures as proposed need to be undertaken.

***Muntjac Deer***

There is a considerable need to develop our understanding of Muntjac deer, this will only come through research, evaluation and monitoring. The following should be included as individual aims additional to the above:

- Work with the Highways Agency, and other statutory and non-statutory bodies to continue with their research and ongoing monitoring of Muntjac deer and other deer species, including the effectiveness of control techniques.
- Explore measures, which minimise or mitigate the impact of this species, including woodland management and planning, highway design and roadside planting.
- Encourage and support regional and local studies into the impacts of this species.
- Encourage, facilitate and support the development of regional and local muntjac deer management strategies with an emphasis on halting its spread northwards.

- Develop as broad partnership involvement as possible in the preparation of such an action plan or strategy for this species.

A separate aim that includes monitoring should also be included to ensure that the actions and operations being undertaken are achieving the required results and, if not, the actions and operations should be modified.

A landscape-scale approach to control is required for this species. The Deer Initiative promoted a landscape-scale approach to deer management, but it has ceased operations.

### ***Signal crayfish***

This aim should refer to the method of eradication chosen which should be safe, economically viable and humane.

The data recording method used should also be included to provide a more comprehensive picture of the benefits or failure of eradication in a given area. How the data are recorded is essential to understanding the outcome.

A monitoring aim should be included as this will provide a clear idea of whether a given method of eradication is working. This could be worded as: *“to monitor the results of eradication, to ensure that the method undertaken is effective, economically viable and safe”*. Such a monitoring strategy should be evaluated after the first cycle of control, when it will be possible to investigate the effectiveness of the strategy to detect change in a more meaningful way.

We would like to suggest a slightly amended set of aims for signal crayfish management measures:

- to prevent signal crayfish reaching any new sites that they could not colonise without human assistance;
- to reduce the further spread of the species from established populations; and,
- to ensure that any management measures are both designed and delivered in a way that produces data of a suitable quality to further inform evidence-based management and mitigation measures.

We are very concerned regarding any further promotion or advocacy of the baited trapping of signal crayfish. We understand that there is growing evidence from around Europe that opening up trapping to the general public has led to the further spread of signal crayfish (and crayfish plague) to new areas.

There is currently no good research showing any positive benefit of crayfish trapping. As an activity, we feel that the ecological and economic risks of signal crayfish trapping (e.g. enabling spread to salmonid fisheries) far outweigh any very minor short-term benefits. The activity is completely unsustainable. There should be a much greater emphasis upon developing ecosystem-level approaches to mitigating the negative impacts of this species.

More broadly, we are also very concerned that the current approach in parts of England promotes a commercial market in a most problematic invasive species. This poses huge biosecurity concerns, which would be almost impossible to effectively mitigate. There are significant risks associated with any commodification of an invasive species. We would not advocate a market selling the dried flower heads of giant hogweed; how then could we possibly support a market involving the sale of live American signal crayfish?

We appreciate there is a small established commercial industry in signal crayfish trapping. We would like to see any continuation of this activity focused only upon physically isolated still-water sites in southern England, which are registered with Cefas and periodically inspected for biosecurity. The operators must be trained and accredited, and this training and accreditation must be refreshed frequently (say every 3 years) in order for them to keep up to date with new research, regulations and best practice. Only licensed biosecure carriers can be allowed to transport live signal crayfish and only short distances for the purpose of purging. There must be no live sale of signal crayfish.

### ***Grey Squirrel***

Given how widespread this species is within the UK, targeted and collaborative reduction of grey squirrel populations where red squirrel populations still exist should be of primary importance, and should be undertaken where practical, effective and economically viable. This should be included within this aim.

Examples of how the current population of this species will be controlled should be included, with the clarification that the method should be safely carried out. Shooting, a common method for eradicating grey squirrels is not suitable for public places, and can disturb local residents and cause tensions. The method chosen must take into consideration the local area, and take into consideration any conflict of interest.

Eradication should be specific, and the costs should be carefully considered. Many experts consider this would be an unending task as there are too many grey squirrels to eradicate, therefore they will keep coming back.

### ***Terrapins***

We recommend that a third aim is included for this species: to regulate the trade of this species, including an evaluation of the current standards for trading. This should look at the banning of sale of *Trachemys* species, targeting private collectors and sole traders, ensuring that this is made clear to members of the public.

## **Q7. What are your views on the general management measures set out in Appendix B?**

Paragraph 2 of Appendix B makes no mention of the work of professional ecologists and environmental managers, and the importance of Preliminary Ecological Appraisals in identifying invasive alien species, assessing their risk and recommending actions in accordance with local plans. Suggested rewording would be: *“the work carried out by professional ecologists, environmental managers, invasive weed control specialists and local action groups to eradicate and control widely spread species”*.

The general management measures for widely spread species (Table 3) are welcomed. However, we recommend some amendments to provide a more detailed explanation:

- The first bullet point should be amended to *“the continued support of research into viable early detection, risk assessment, control and eradication methods for these species”*.
- National strategies, as mentioned in the third bullet point, are welcomed, however this should include examples and reporting programme requirements.

- The seventh bullet point should clarify what is meant by “*private collections*”. This should include gardens as someone may have cotoneaster in their garden but would not think of it as a private collection.
- Promotion of direct action through volunteer groups is important; however, it is essential that appropriate training is implemented, to ensure that individuals carrying out eradication are competent. Otherwise if such training is not provided, this could reverse efforts in eradication of that species.
- There should be an additional bullet point stating “*the promotion of management by professional ecologists, environmental managers and invasive alien species control specialists to contribute to the recording and mapping of invasive alien species, undertaking evidence based risk assessment and recommending appropriate management with follow up monitoring and remedial action, where feasible in collaboration with local action groups and other local stakeholders.*”
- Recognition of the work of professional ecologists and environmental managers should be included, for example, the importance of Preliminary Ecological Appraisal (PEA) and other ecological surveys in identifying invasive alien species, assessing their risk and recommending actions for eradication. These surveys will require mapping the location of invasive species, therefore contributing to the mapping of populations and prioritising eradication.
- “*The encouragement of local authorities, businesses and industry and non-governmental organisations to have policies with respect to dealing with widely spread species of EU concern*” should also be included.
- The 11<sup>th</sup> bullet point should include examples of how this will be achieved and a note on the viability of the information, as often invasive species are conflated, and overly exaggerated.
- Standard advice that can be used nationally, and be recognised as reliable should be included as an aim as this will prevent misinterpretation of information.
- It should be specified that control measures will be safe, reliable and humane.
- As part of raising public awareness, this should include how to prevent or reduce the sale of species on the internet which is a significant problem with many of these invasive species and is largely unregulated.
- Reduction of captive animal species and plant species in private collections is important, however, this should exclude where the need for scientific research on such an invasive species is present. It is important to recognise the role that research plays in understanding these widely spread species.

We recommend several amendments to Table 4:

- The term “*catchments*” under the first bullet point is too limited. This suggests hydrological catchments, however some plants, such as those dispersed by the wind, do not respect such boundaries. The term should be extended to include geographic areas or features at risk from a given species, ranging from local authority administrative areas, to highway corridors, AONBs and National Parks.
- The third bullet point should be reworded to “*the use of direct action to manage these plants. This includes the work of professional invasive species management specialists, professional environmental managers, landscape professionals, ecologists, local action groups, nongovernmental organisations and local authorities in eradicating or controlling*”

*these species (including manual, mechanical and chemical methods)*". A number of these species also need dealing with in urban areas to stop them spreading into the wild.

- In regard to the eighth bullet point, training is already provided for at least some of those listed, for example, our members have provided training for staff in enforcement agencies in identification skills. We suggest this should state *"the extended provision of training to customs officials, regulators, and National Wildlife Crime Unit (NWCU) to ensure widely spread species can be identified by enforcement bodies"*.
- We recommend the following be added as an additional bullet point: *"the extended provision of training to professional ecologists, environmental managers, landscape professionals and local action groups with associated accreditation recognised by all those engaged in dealing with invasive alien species"*

We also recommend a couple of additional bullet points to Table 5:

- *The provision of advice on how to dispose of both live and dead animals.*
- *The extended provision of training to professional ecologists, environmental managers, landscape professionals and local action groups with associated accreditation recognised by all those engaged in dealing with invasive alien species.*

**Q8. Are there any additional actions you think should be used as general management measures for particular widely spread species?**

The following additional actions could be used as general management measures under Table 3, for widely spread species:

- Where the reduction of captive species or private collections has been included as a measure, regulations or guidance can be put in place to facilitate this.
- Encourage all stakeholders, including traders to know exactly what they are selling or exchanging and ensure their customers know what they are receiving regarding widely spread invasive species.
- Promote awareness of which species are native to an area and which are not. Identification by trained and competent individuals will uphold standards.
- Promote awareness of and use of appropriate methods to prevent the escape and spread of these invasive species.
- Encourage the development of a simple questionnaire to traders and keepers, which can act as a basic risk assessment. The questions could be designed so that the person will gain awareness of what species they are purchasing for the first time, so that they avoid these widely spread invasive plants and animals.
- Raise awareness of global warming and its impact on the invasiveness of these species; a factor which does not get enough attention at either local or national levels.
- Increase awareness of the need to submit data for these species including the development of a comprehensive database to collate information on past invasions which is vital for providing the information on which to base policy decisions.
- Producing a rapid response system is required to neutralise new alien species before they become widespread, including the identification of major pathways for introduction of these species into new areas, such as county/regional boundaries.



- Improving the co-ordination of invasive species eradication should be included by reducing the overlaps and redundancies caused by the involvement of multiple organisations with insufficient coordination between local authorities and regions in the England and Wales.
- Assessing existing approaches to how invasive species are dealt with at a local level, including the level of funding needed by Local Planning Authorities to ensure coordination between LPAs and to ensure data are collected effectively.
- Provide a focus on rewilding and encouragement of native predators that could combat invasive species, for example the introduction of pine marten to successfully control grey squirrel<sup>1</sup>.
- Provide clear and accurate information about widely spread invasive species, including legislation on the release of animals to the wild, which is sometimes very complex such that members of the public and developers find inaccessible and difficult to interpret.

The omission of Regional Invasive Alien Species Management Plans (RIMPS)<sup>2</sup> is surprising. A large volume of work went into the production of RIMPs for all regions of England which are a valuable start in achieving a coordinated approach in the management of invasive alien species, including the “widely spread species of Union concern in England”. These should be included in the management strategy for these species and consideration should be given to extending RIMPS to Wales, as well as Scotland, Northern Ireland and Republic of Ireland.

**Q9. Are there any actions that you think should not be used as part of a general management measure for a particular widely spread species?**

No comments.

**Q10. What are your views on the proposed licensable management measures set out in Appendices C & D?**

**Appendix C**

**Table 6**

A key omission here is the use of plant material, both live and dead, for training and education purposes. Whilst you could construe that by providing training is part of work aimed at “*eradication, population control or containment*”, it would be better to make this clear to avoid risks associated with using such material, for example, the use of preserved material with seeds and inappropriate disposal post training, and time wasted by Defra/Welsh Government having to deal with enquiries and requests for permission to use plant material for training. A code of practice for the use of invasive alien plant material in training and education would be a useful measure.

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<sup>1</sup> Sheehy E. & Lawton C. (2014) Population crash in an invasive species following the recovery of a native predator: the case of the American grey squirrel and the European pine marten in Ireland, *Biodiversity Conservation*, 23(3), 753-774. Available at: <https://doi.org/10.1007/s10531-014-0632-7> (accessed 10/09/2019).

<sup>2</sup> <http://www.nonnativespecies.org/index.cfm?pageid=632>

**Q11. Are there any additional actions you think should be allowed as a licensable management measure for a particular widely spread species?**

No

**Q12. Are there any actions that you think should not be allowed to be used as part of a licensable management measure for a particular widely spread species?**

No

### **Additional Comments**

To achieve effective management of these widely spread species, there needs to be appropriate funding and resources at the local level to implement and govern any new strategy.

Although this species list is taken from the European Invasive Alien Species list, effective management of species that are not included must also be given the same attention. For example, American mink, *Rhododendron ponticum* and Japanese knotweed, and serious pests and diseases of trees, such as *Phytophthora ramorum*, *Hymenoscyphus fraxineus* and Oak processionary moth (*Thaumetopoea processionea*) are omitted, all of which are widely spread invasive alien species.