Summary of responses to the Consultation on the Invasive Non-Native Species Framework Strategy for Great Britain - 28 February to 23 May 2007

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1.0 Introduction

1.01 This document is a summary of the responses received to the public consultation on 'The Invasive Non-Native Species Framework Strategy for Great Britain' held between 28 February 2007 and 23 May 2007 (http://www.nonnativespecies.org/07_Public_Consultations.cfm). It summarises and highlights the range of responses received. The authoritative source is the respondents' formal replies which are available through the following sources:

In England, the Defra Information Resource Centre
Tel: 020 7238 6575; email: defra.library@defra.gsi.gov.uk

In Scotland, the Scottish Government Library
Tel: 0131 244 4552

In Wales, the Welsh Assembly Government Publication Centre
Tel: 02920 823683; email: assembly-publications@wales.gsi.gov.uk

1.02 The purpose of the consultation was to seek views on the draft GB Framework Strategy to inform its finalisation. Views were also sought on the Regulatory Impact Assessment that accompanied the draft Strategy.

1.03 The draft Strategy includes 50 key actions under the following headings:

- Prevention
- Early detection, surveillance, monitoring and rapid response
- Mitigation, control and eradication
- Building awareness and understanding
- Legislative framework
- Research
- Information exchange and integration.

1.04 The consultation attracted 95 replies from individuals and organisations representing a wide variety of interests. A list of those who responded to the consultation is included at Annex A. Where abbreviations of organisations' names are used these can be found in the glossary at Annex B.

1.05 To aid collation and analysis of the responses a structured response document containing the 56 consultation questions was compiled and respondents were encouraged to use it to record their responses.

1.06 In addition to the consultation responses the Stakeholder Forum on non-native species that was held during the consultation period on 3 May 2007 ran four workshops to help inform the development of the GB Strategy. The key relevant messages from these workshops are included in this document (Section 4.14).

2.0 Executive Summary

The main driver for this Framework Strategy is the increasing recognition that invasive non-native species are the second greatest threat (after habitat loss) to biodiversity worldwide. Because of the continuing trends in the global movement of people and goods, they pose a growing problem to the conservation of biodiversity, as well as to economic interests such as agriculture, forestry and fisheries. The following briefly summarises the views expressed on each chapter of the draft Strategy.

2.01 Introduction

The majority of respondents (69%) believed that species introduced by climate change should be included in the Strategy (but mainly for monitoring purposes). Most respondents (87%) agreed that the 2003 Review recommendations were still relevant and virtually all (98%) agreed that a partnership approach was vital for success.

2.02 Strategic Aims

There was strong support (87%) for the statement of strategic aims in the Strategy.

2.03 Scope and Terminology

Most respondents (75%) were supportive of the scope of the Strategy. However, several suggested that it should include disease issues and others suggested that there should be more emphasis on marine issues. A number also suggested that the Strategy should encompass the UK Overseas Territories.

2.04 The GB Non-native Species Mechanism

There was general support for the current structure (58%), provided it is properly resourced and has clear roles and responsibilities defined. Several respondents suggested the need for non-governmental involvement on the GB Programme Board.

2.05 Strategic Approach

The general approach taken in the Framework Strategy was welcomed by the majority (92%) of respondents.

2.06 Prevention

There was strong agreement (>90%) that prevention is a key part of the Strategy but there were divergent views on exactly how to achieve a balance between prevention and control of invasive species already present.

2.07 Early Detection, Surveillance, Monitoring and Rapid Response

The objective and actions were welcomed by over 90% of respondents but the need for swift action and clear lines of responsibility was stressed by many respondents.

2.08 Mitigation, Control and Eradication

The majority of respondents (approx. 90%) supported the objective and actions proposed in this chapter. Many respondents were worried that, as control is often expensive, it may not receive sufficient support.

2.09 Building Awareness and Understanding

This was seen as a key area by a large number of respondents with the proposed objective and actions agreed by virtually all respondents. The difficulties of effective action were acknowledged by many.

2.10 Legislative Framework

The proposed objective and actions were supported by over 90% of respondents. Concerns were expressed by some respondents that the proposed actions were not sufficiently robust.

2.11 Research

There was almost unanimous support for the objective and key actions in this chapter.

2.12 Information Exchange and Integration

The objective of this chapter was supported unanimously by respondents and the key actions received almost unanimous support (99%).

2.13 Implementation and Review

The vast majority of respondents (83%) agreed that the Strategy encapsulated the Vision set at the start while 69% believed the Strategy was balanced in terms of priorities. Many respondents suggested that there was a need for an implementation plan and timetable to enable progress to be measured.

3.0 Collation of responses

3.01 Most respondents (64%) used the questionnaire format of the consultation response document and many respondents also added qualifying comments on individual proposals.

3.02 Not all respondents gave clear indications of support or opposition to all of the questions posed. The figures quoted below are therefore given in terms of percentages of those who expressed a clear opinion one way or the other on each question.

3.03 In the data presented below, each response was given equal weighting, although some responses were from individuals and some from groups or organisations representing more than one person. Individuals who belonged to a group who had responded on behalf of their members may also have responded in their own right as an individual.

3.04 During the finalisation of the GB Framework Strategy the views expressed by respondents will be taken into account and a formal response will be published shortly.

3.05 Comments included in this report give an indication of the general flavour or range of comments received. Many of these have been paraphrased to encompass more than one response and so not all comments have been attributed to any particular respondent. Due to the large number of comments it is not possible to present all comments in this summary but the full responses have been made available as noted earlier.

3.06 Views that were expressed at the Stakeholder Forum in Edinburgh that are relevant to the Strategy were collated and are summarised in this document (Section 4.14).

4.0 Summary of responses to individual questions (1 to 56)

4.01 Introduction

The introduction aimed to set the scene for the subsequent Strategy chapters and had a diverse set of questions covering this. Respondents expressed strong support overall for the continued relevance of the 2003 Review of Non-native Species Policy, generally agreed that a partnership approach was needed and that prevention was important.

QUESTION 1: Notwithstanding the need for further debate on the general subject area, do you agree that non-native species driven here by climate change and which might pose threats of an invasive nature should be within the scope of the Strategy?

No. who replied to question	% of total response	% Yes	% No
83	87	69	31

While 69% of respondents agreed that species driven here by climate change should be incorporated within the Strategy there were widely divergent views on the issue. Many of those that agreed that they should be included qualified their responses with the suggestion that, while monitoring was appropriate for these species, efforts to remove them were not. Almost one-third of respondents did not agree with their inclusion citing the fact that colonisation by novel species was a continuous natural process.

Comments:

'Would acting as an 'ecological Canute' be appropriate or effective?' RSPCA.

'How is the cause of range extension to be assessed as being due to climate change rather than other influences?' SEPA.

QUESTION 2: With reference to annex 2 [of the draft Strategy] and bearing in mind that there are also 41 sub-recommendations and three miscellaneous recommendations in the 2003 report, do you agree that the eight key recommendations [of the 2003 Policy Review report] remain valid?

No. who replied to question	% of total response	% Yes	% No
78	82	87	13

Of those that responded to this question 87% agreed that the key recommendations of the 2003 Review Report were still valid. Several respondents suggested that Recommendation 1 was now redundant as there

was a co-ordinating organisation. Many respondents suggested re-ordering the list of recommendations.

QUESTION 3: Are there new key areas of action not embraced by the recommendations of the 2003 report that should be addressed? If so, what are those areas and how might they be addressed?

The majority of respondents did not have any suggestions for new key areas. Suggestions for new key areas included: one that specifically made reference to climate change, one that includes native invasive species and one advocating research to understand the mechanism of invasion as well as one linking this issue to animal and plant diseases.

QUESTION 4: The Strategy is predicated on the basis that tackling these issues must involve strong partnership working between all stakeholders through their various functions and roles - do you, or does your organisation support this principle?

No. who replied to question	% of total response	% Yes	% No
80	84	98	2

There was virtually unanimous support for a strong partnership approach but many respondents were worried that waiting for unanimity would impede decisive action and would be impossible in most cases anyway.

Comments:

'There needs to be clear accountability and responsibility for lead roles in taking this forward.' Environment Agency.

'True partnership working, rather than top-down dictats, creates a greater sense of shared responsibility and a desire to achieve goals.' Countryside Alliance.

'The ultimate responsibility for invasive non-native species must be accepted by a governmental organisation with the resources, structure and influence to ensure that they are dealt with.' The Wildlife Trusts.

QUESTION 5: Do you agree with the proposed shift towards an increased emphasis on a more preventative approach, in other words, an approach that involves investment now to reduce future risks and costs?

No. who replied to question	% of total response	% Yes	% No
80	84	86	14

While 86% of respondents supported the proposal to shift emphasis to a more preventative approach a large number of these were worried that any such shift would divert scarce resources from action to control established invasive species. Getting this balance right will be key.

Comments:

‘A preventative approach could be used even for established non-native species to prevent spread.’ West Sussex County Council.

‘It is important that no realistically achievable opportunities for eradication should be missed.’ Fisheries Research Services (FRS).

‘Emphasis on prevention is important but it must be balanced against a proportionate and effective approach to tackling species already established in the wild.’ Joint Links.

QUESTION 6: Do you foresee any significant pitfalls or opportunities in making this [shift in emphasis to a more preventative approach] happen?

There was a large number of possible pitfalls suggested. These included lack of resources, inadequate early warning system, over-complication of the non-native species Mechanism, problems with public opinion, trade issues and general adverse reaction from vested economic interests and problems with conflicting (and difficult to enforce) legislation. Access to private land for control, slow responses to urgent issues and the time consuming nature of risk assessments were also mentioned.

Comments:

‘For such an approach to work effectively it is necessary to identify significant entry pathways and high-risk taxa and ensure an adequate level of surveillance is in place.’ Natural England.

‘The formation of more new legislation without considering how and who will enforce it and how it will be delivered’ East Dunbartonshire Council.

4.02 Strategic Aims

QUESTION 8: Do you agree that the statement of Strategic Aims captures the scope of what is needed?

No. who replied to question	% of total response	% Yes	% No
80	84	87	13

A large majority (87%) agreed that the strategic aims captured the scope of what was needed. Several respondents suggested that this chapter should give more detail on funding arrangements. A greater emphasis on the European and global context (including mention of the Global Strategy for Plant Conservation) was also needed here.

Comments:

'The relationship of the Strategy to wider biosecurity concerns (including human and animal diseases) needs to be clarified and made explicit.' JNCC.

4.03 Scope and Terminology

QUESTION 10: Do you agree with paragraph 3.1 in that this Strategy should aim to set out a high-level strategic game-plan for the GB Administrations and their related bodies while providing sign-posts for other non-governmental regional or local programmes and initiatives?

No. who replied to question	% of total response	% Yes	% No
75	79	95	5

There was a very high level of agreement (95% of those who answered the question) that the main role of the Strategy was to set out a high-level strategic plan for the GB Administrations. Many respondents suggested, however, that the Strategy should not lose sight of the fact that actions need to be delivered on the ground as well as the fact that it needed wide international context.

Comments:

'It should be recognised that most action will take place at a local level and so this is where resources should be targeted.' British Waterways.

QUESTION 11: How do you think that this process can work best so that the Strategy adds value to non-governmental programmes and initiatives?

Many respondents stressed the need for local participation and the importance of sharing experience (facilitated by the GB Programme Board and Non-native Species Secretariat). Several also suggested that the Government needs to lead by example.

Comments:

'A clear mechanism should exist for local programmes to feedback best practice or problems encountered to ensure that similar bodies are best equipped to deal with their own issues.' Cardiff Harbour Authority.

QUESTION 12: Do you agree with this approach described in paragraph 3.3 [that states that GMOs, bacteria, viruses and plant and animal diseases are not within the scope of the Strategy]?

No. who replied to question	% of total response	% Yes	% No
76	80	75	25

Somewhat fewer respondents (75%) agreed with the overall scope of the Strategy. A large number thought that diseases (mainly plant or animal but

also human in a small number of cases) should be included within its scope. Some of these respondents suggested that if this was impossible then the linkages should be made more explicit. Several respondents suggested that more needed to be stated on how this Strategy fits into European and global initiatives such as the European Strategy and GISP.

A number of respondents suggested that the definitions (particularly for the terms ‘invasive’ and ‘non-native’) needed to be tightened to avoid misinterpretation.

A number also suggested that the UK Overseas Territories should be included within the scope of the Strategy due to their biodiversity importance and the high level of threat from invasive species.

Many respondents suggested that marine issues needed to be more explicitly mentioned by the Strategy.

Several respondents suggested that the scope of the Strategy should include formerly native species (such as beaver and wild boar) which may be the subject of re-introduction attempts.

Several respondents suggested that lower taxonomic categories (not just at the species level and above) needed to be within the scope of the Strategy.

4.04 The GB Non-Native Species Mechanism - Roles and Responsibilities

QUESTION 14: Do you feel that the GB Non-Native Species Mechanism has all the key components necessary to oversee delivery of this Strategy?

No. who replied to question	% of total response	% Yes	% No
73	77	58	42

A small majority (58%) of respondents agreed that the existing Mechanism contained all the key components. Lack of strategic involvement of key non-government stakeholders (particularly on the Programme Board) was cited by many respondents as a major problem. A large number of respondents also thought that the Mechanism looked cumbersome and were afraid that this would not facilitate action on the ground. Several suggested that there needed to be clear definitions of roles and responsibilities within the Mechanism to aid implementation of the Strategy as well as having a central point of contact.

Comments:

'The structure of this mechanism appears to be possibly too complex, cumbersome and bureaucratic.' Britt Vegetation Management.

'There appears to be a lack of connectivity to delivery.' Cornwall Knotweed Forum.

'A widely recognised, trusted, easily accessible, central point of contact for the public is essential.' Joint Links.

QUESTION 15: Do you have views or suggestions on how to maximise the benefits to be gained from each of the GB Mechanism's component parts?

Many respondents stressed the need for clear objectives as well as clarity of roles and responsibilities. Many stressed the need for wide involvement and the need to know where to go to for information.

QUESTION 16: What pitfalls or difficulties do you foresee the GB Mechanism will need to address?

Lack of funding was seen by many as a critical constraint, with funding for the Mechanism generally mentioned as a problem, lack of funding for the Secretariat and for rapid response also mentioned specifically by several respondents.

The cumbersome and bureaucratic nature of the Mechanism was also questioned by many respondents, likewise the lack of stakeholder awareness as well as conflicting priorities among organisations. Several respondents

suggested that the role of the proposed Marine Management Organisation (under the Marine Bill) needed to be clarified in relation to the Mechanism.

Comments:

‘The GB Mechanism will need to reconcile a variety of widely dispersed views and interests without becoming entrenched by bureaucratic systems and economics.’ SEPA.

4.05 Strategic Approach

QUESTION 18: Do you, or does your organisation support this overall approach in chapter 5? If not, what cost-effective alternatives do you suggest?

No. who replied to question	% of total response	% Yes	% No
74	78	92	8

There was overwhelming support for the overall approach proposed in this chapter with the CBD approach being seen by most as very relevant to the GB Strategy. One respondent was worried by the signals sent out by the term 'external stakeholders'.

Comments:

'Use of vast global experience of e.g. GISP, IUCN, CABI is the most cost-effective way of delivering the three levels.' CABI.

'A balance must be found between effective consultation and efficient delivery of the Strategy objectives.' Highways Agency.

QUESTION 19: Given that resources always have limits, do you have suggestions or ideas for maximising the benefits to be gained from this approach?

Encouraging local fora and the use of volunteers were suggested by several respondents as efficient ways of maximising the benefits. The importance of innovation and responsiveness were also stressed as was synergy with existing initiatives such as the Water Framework Directive. Producing a plethora of plans at the expense of action on the ground was mentioned as being a bad use of resources.

Comments:

'Energies could be wasted producing a raft of plans.' Plant Link.

'There is a real danger of too much talk and not enough action.' ConFor.

4.06 Prevention

QUESTION 21: Do you agree with paragraphs 6.4 and 6.5 [that movements of species within GB should also be encompassed within the Strategy]?

No. who replied to question	% of total response	% Yes	% No
81	85	91	9

There was very strong support for the idea that the Strategy should also embrace movements of native species within GB. There were worries from some that this should not serve to impede movements induced by climate change. The difficulty in many cases of distinguishing 'natural' range extensions from those directly facilitated by man was also mentioned. There was also nervousness by some respondents that the Strategy would serve to inhibit movements of some species (such as gamebirds) to places where they do not currently occur.

Comments:

'In practice there will be significant difficulties in differentiating human-assisted introductions from natural range extensions, particularly within the marine environment.' JNCC.

QUESTION 22: Do you support the chapter 6 (Prevention) objective and underpinning actions?

	No. who replied to question	% of total response	% Yes	% No
Objective	78	82	91	9
Actions	75	79	93	7

There was also overwhelming support for the objective and key actions of the Prevention chapter – 91% of respondents supported the objective and 93% supported the key actions. There was some nervousness about placing too much stress on prevention to the detriment of control. The different suite of pathways for marine species and the overwhelming importance of prevention for marine species was also stressed by several respondents. There was a suggestion that imported populations of native species should also be within the scope of this chapter.

Potential problems with risk assessment were highlighted by some – particularly their slowness and the dearth of information (for some species) with which to populate them.

QUESTION 23: Do you have suggestions or ideas for maximising the benefits to be gained from these actions?

The use of the Biodiversity Action Planning process was suggested by some as a way of aiding delivery.

Comments:

‘Highlight high profile interceptions like NZ and Australia.’ CABI.

‘It would be useful to demonstrate better links with similar strategies, bodies and activities on the continent.’ The Wildlife Trusts.

‘Within industry we need a credible regulatory ‘stick’ as the ultimate threat to ensure good behaviour.’ Syngenta Bioline.

4.07 Early Detection, Surveillance, Monitoring and Rapid Response

QUESTION 26: Do you agree with the general principle expressed in paragraph 7.6 [that we should be guided by the CBDs Precautionary approach]?

No. who replied to question	% of total response	% Yes	% No
77	81	90	10

There was very strong support (90%) for taking the precautionary approach although several respondents suggested that this paragraph should be strengthened. There was also the suggestion from some that the risk assessment process could hold up rapid reaction or indeed impede it. Others suggested that risk assessment is not infallible and may not detect all species which go on to cause significant problems.

Comments:

'Emphasis should be placed on developing clearly understood channels of communication and decision making as well as mechanisms of prioritisation.' Country Land and Business Association.

QUESTION 27: Do you support the chapter 7 (Early Detection, Surveillance, Monitoring and Rapid Response) objective and underpinning actions?

	No. who replied to question	% of total response	% Yes	% No
Objective	75	79	95	5
Actions	73	77	95	5

Both the proposed objective and key actions received almost unanimous support (95%). Many respondents pointed out that current arrangements for monitoring non-native species are piecemeal. Several respondents pointed out that monitoring in the marine environment was more labour intensive than that in the terrestrial and freshwater environment but that requirements under the Water Framework Directive might be helpful.

Comments:

'This is probably the best opportunity for a quick win in that a repository for current information and a simplified system for data capture should improve the current approach enormously.' Environment Agency.

QUESTION 28: Do you have suggestions or ideas for maximising the benefits to be gained from these actions?

Several respondents suggested that lines of decision making needed to be short and roles and responsibilities clear to facilitate rapid reaction. Support for local records centres was stressed as important for maintaining the flow of information to the proposed national network. Many respondents suggested that the information on species distribution needed to be held on a single web-based source and that the National Biodiversity Network was the only sensible repository for these non-native species data. The decline in taxonomic expertise was cited by several respondents as an important factor limiting our ability to identify species in some taxa and training was urged. Difficulties over data sharing and ownership were mentioned by several respondents and the use of existing databases was encouraged by others.

Comments:

‘The assumption should be that any recently-established species should be removed unless there is good evidence that it will be harmless.’ Natural England.

‘Benefits would be maximised by making use of existing EU databases (e.g. DAISIE) and organisations (IMO).’ SAMS.

4.08 Mitigation, Control and Eradication

QUESTION 31: Do you agree with the principle expressed in paragraph 8.3 [that in principle eradication or control should be instigated where a species is having a substantial negative impact and control is feasible, humane etc.]?

No. who replied to question	% of total response	% Yes	% No
77	81	90	10

A large majority (90%) of respondents agreed that control or eradication measures should be instigated where it is shown that non-native species are having or likely to have significant negative impact. Several respondents suggested, however, that the inclusion of the phrase 'beyond reasonable doubt' could be an excuse for inaction and was not in accord with the precautionary principle.

QUESTION 32: Do you support the chapter 8 (Mitigation, Control and Eradication) objective and underpinning actions?

	No. who replied to question	% of total response	% Yes	% No
Objective	75	79	92	8
Actions	75	79	89	11

An overwhelming majority of respondents (92%) agreed with the objective of the chapter and 89% agreed with the key actions. The high cost of many long-term control measures was pointed out by many respondents. The need for adaptive and flexible management was pointed out by others. Several respondents suggested that there is a danger of having too complex an array of plans.

Comments:

'There is a danger of giving too much emphasis to the risk assessment as an all-encompassing tool.' JNCC.

QUESTION 33: Do you have suggestions or ideas for maximising the benefits to be gained from these actions?

Many respondents stressed that control action needs to be delivered locally and it needed substantial and continuing support (but with much control needing landscape-scale action involving all land uses). There was the suggestion that there is much work being carried on at present and that some sort of forum to help spread best practice would be very useful.

Comments:

‘We should never avoid a target or habitat because the scale of the problem seems too high.’ CABI.

‘Eradication is the best solution for invasive alien species because it is permanently effective as well as cheaper than ever-ongoing control.’ European Squirrel Initiative.

‘The strategy should provide a more practical steer for participants by identifying where good practice and advice might be found.’ RSPB.

‘The process must involve land owners and manager representatives.’ The Wildlife Trusts.

4.09 Building Awareness and Understanding

QUESTION 36: Do you support the chapter 9 (Building Awareness and Understanding) objective and underpinning actions?

	No. who replied to question	% of total response	% Yes	% No
Objective	79	83	97	3
Actions	79	83	92	8

There was almost unanimous support for the objective of this chapter (97%) with 92% of respondents agreeing with the key actions. Many respondents commented that this was a vital area to get right but was potentially very large. The comprehensive nature of the actions was commented on by some although this was interpreted by others as being too draining on resources for control. Several wondered if assessing baseline attitudes was a cost effective use of resources.

Comments:

'The actions detailed in chapter 9 appear to be overly ambitious and resource hungry.' British Waterways.

QUESTION 37: Do you have suggestions or ideas for maximising the benefits to be gained from these actions?

Several people suggested that professional people needed to be used in any marketing campaign. The need for clear, simple messages and a joined up approach (i.e. agreeing messages) between Government and the wide range of stakeholders was stressed by many respondents. Several respondents suggested initially targeting a small number of key target audiences as resources are limited. Suggestions for these included the pet and horticulture trades, anglers and policy makers. Using a standard format for Codes of Practice was also suggested as was having a single information source.

Comments:

'Might more be achieved by spending money on a well-organised awareness campaign than if the same money was spent on lawyers' time drafting more legislation.' OATA.

4.10 Legislative Framework

QUESTION 40: Do you support the chapter 10 (Legislative Framework) objective and underpinning actions?

	No. who replied to question	% of total response	% Yes	% No
Objective	78	82	96	4
Actions	74	78	93	7

There was very strong support for both the objective (96%) and key actions (93%) of this chapter. Many respondents commented on the fragmented and ineffective nature of current legislation on non-native species. Several respondents commented that the key actions were too vague and did not promise enough reform of the legislation. The difficulty of enforcing legislation in this area was pointed out by several respondents while learning from overseas experience was stressed by others.

Comments:

'There is an urgent need to assess the effectiveness of existing legislation.' West Lothian Council.

QUESTION 41: Do you have suggestions or ideas for maximising the benefits to be gained from these actions?

Several respondents mentioned the opportunities presented by the Marine Bill. Others suggested that merely passing legislation was not sufficient, it needed to be promoted and monitored. The current use of 'black lists' [in Schedule 9 of the Wildlife and Countryside Act] was considered unwieldy by many respondents and there were suggestions that these could be streamlined. There was also the suggestion to carry out a gap analysis of pathways to ascertain where there was a lack of existing regulation.

Comments:

'The legislative framework should recognise more explicitly the importance of international agreements such as the IMO/Ballast Water Convention.' Associated British Ports.

4.11 Research

QUESTION 44: Do you support the chapter 11 (Research) objective and underpinning actions?

	No. who replied to question	% of total response	% Yes	% No
Objective	79	83	99	1
Actions	77	81	99	1

There was virtually unanimous support for the objective (99%) and key actions (99%) of the research chapter. Links to Global and European research initiatives were stressed by many respondents.

QUESTION 45: Do you have suggestions or ideas for maximising the benefits to be gained from these actions?

Several respondents suggested that there was need for more co-ordination of research among funders to avoid gaps or duplication. Use of the UK BRAG and 2003 Non-native Review as a basis of prioritisation was also stressed. Respondents noted that there is a need for information to get to practitioners, not just to be published in peer reviewed journals. The need for a central database on research (to help foster best practice) was also suggested.

Comments:

'Co-ordination of research, support to strategic research and monitoring international research are key roles for the Secretariat and Programme Board.' Plantlife.

4.12 Information Exchange and Integration

QUESTION 48: Do you support the chapter 12 (Information Exchange and Integration) objective and underpinning actions?

	No. who replied to question	% of total response	% Yes	% No
Objective	74	78	100	0
Actions	72	76	99	1

There was unanimous support for the objective of this chapter and 99% of respondents also supported the key actions.

QUESTION 49: Do you have suggestions or ideas for maximising the benefits to be gained from these actions?

There were several suggestions including using the Secretariat to collate 'grey' literature (on control etc.) and make it readily available to end users. Forging stronger links internationally was also seen by many as key to success.

Comments:

'Probably the most important short term action is sharing information within the UK.' Environment Agency.

'We must not think that we have all the answers, but must co-operate with our EU partners to ensure that knowledge is disseminated throughout.' Thurlow Countryside Management R&D.

4.13 Implementation and Review and Concluding Questions

A number of respondents suggested that it was difficult to judge whether a five yearly review process was sufficient as there was no implementation plan or timetable within the Strategy. Inclusion of a set of measurable outputs was one of the main suggestions for inclusion in the final version. Of those that disagreed with five years all suggested shorter review periods or at least a more frequent review of measurable outputs.

Comments

'The framework strategy is long overdue.' West Lothian Council.

QUESTION 53: Looking back over this Strategy, do you feel that the Vision statement in the Introduction clearly encapsulates the overall approach set out?

No. who replied to question	% of total response	% Yes	% No
71	75	83	17

A total of 83% of those who answered this question agreed that the vision statement encapsulates the overall approach of the Strategy. Of those that did not agree, there were divergent views, including its being limited to invasive species, lack of precise definitions of non-nativeness, failure to include natural range extensions and lack of stress on risk assessment and insufficient stress on action on the ground.

QUESTION 54: As an overall strategic framework, do you feel that this Strategy is balanced in terms of the proposed work areas? Could it be improved – if so, how?

No. who replied to question	% of total response	% Yes	% No
68	72	69	31

A majority (69%) of respondents agreed that the Strategy was balanced. A substantial minority, however, felt that the Strategy was not appropriately balanced, many suggesting that the apparent stress on prevention would be to the detriment of existing and future control action.

QUESTION 55: Do you have views on the relative balance of priorities across the areas covered in this framework Strategy?

There was a wide range of views expressed but the most prominent worry among respondents was related to achieving a balance between prevention and longer-term control. Many respondents wanted marine issues to be given

greater prominence and include the impact of climate change on species distributions.

Comments:

‘The emphasis in the Strategy on legislation as a solution to the potential problems caused by invasive non-native species is likely to be its failing.’ RHS.

QUESTION 56: Are there any other significant issues or work areas not covered that should be covered, or that would not clearly fall under any of the existing work areas in the Strategy?

There was a range of issues mentioned by respondents. These included: fungi, marine issues (including ballast water), training issues, funding issues, native invasives, local variation in species and unauthorised introductions of former native species.

QUESTIONS 24, 29, 34, 38, 42, 46 and 50: How can you or your organisation help through your specific functions, role or responsibilities?

This question was asked in each of chapters 6 to 12 (inclusive). There was an overwhelming number of specific offers of help, from actual control of species to offers of advice, help with risk assessments, research and, in particular, help with monitoring and surveillance.

4.14 Feedback from the 2007 Stakeholder Forum

Monitoring and surveillance workshop
The general feeling was that there was little option but to piggyback on existing recording schemes but there needed to be careful targeting of monitoring effort. The data collected on non-native species need to be provided free at point of delivery. Concerns were expressed over long-term funding of datasets. Feedback to recorders was seen as vital and schemes need to be user-friendly.

Education and awareness workshop
This workshop concluded that messages need to be consistent and relatively simple - with a simple primary message plus a more in-depth secondary one. There needs to be general raising of awareness as well as more targeted awareness raising for specific issues. It was agreed that selling the benefits to the public was important as was engaging with marketing professionals to identify the most appropriate media and messages. There is a need for careful management of public expectations as well as education of a broad spectrum of target audiences including magistrates, government officials and Ministers.

Horizon scanning and climate change workshop
There was lively discussion on whether species arriving here as a result of climate change should be included in the Framework Strategy. The overall conclusion was that pragmatism was required about which species to include, e.g. for most marine species there is not much that can be done about them if they are spreading north due to climatic change. There was general agreement that invasions induced by climate change are different from repeat introductions that are due to direct human agency. Risk assessment was seen as a priority but there should be a two-tier risk assessment process with rapid assessments possible to facilitate rapid reaction. A central contact point to deal with queries was also seen as being useful.

Legislative priorities workshop
There was general agreement that current legislation is inadequate and difficult to enforce and that it lacks clarity and definitions of key terms. The 'white list' approach of Schedule 9 means that species often have to cause a problem before they make the list. Legislation needs to reflect the variety of impacts of different non-native species, as well as the fact that species native to GB can be invasive outside their natural range. Specific problems in the current legislative framework that were mentioned included lack of powers of access to land for control and laws that accidentally protect invasive species (e.g. non-native wild birds). There were also suggestions that there needs to be a legislative onus on Ministers to tackle invasive species.

5.0 Conclusions

5.01 We are grateful for the very helpful responses to this consultation and these are being used to help inform the final version of the Invasive Non-native Species Framework Strategy for Great Britain. A formal response to this analysis will be published shortly. The final Strategy will be published by March 2008 along with information on implementation milestones. In the meantime, further preparatory work for its implementation will continue and this will involve key stakeholders.

Annex A – List of respondents in alphabetical order

- Aberdeen City Council
- Aberdeenshire Council
- Animal Aid
- APEM Ltd
- Ashcroft, D
- Associated British Ports
- Bolton Council
- British Association for Shooting and Conservation
- British Dragonfly Society
- British Trust for Ornithology
- British Waterways
- Britt Vegetation Management
- CABI Europe
- Cardiff Harbour Authority
- Central Scotland Forest Trust
- Centre for Environment, Fisheries and Aquaculture Science
- City and County of Swansea
- Confederation of Forest Industries (UK) Ltd
- Cornwall Knotweed Forum
- Country Land and Business Association
- Countryside Alliance
- Countryside Council for Wales
- Daniels, S
- Derbyshire County Council
- Dunston Woodwatch
- East Dunbartonshire Council
- English Heritage
- Environment Agency
- European Squirrel Initiative
- Fisheries & Angling Conservation Trust Ltd
- Fisheries Research Services
- Forestry Commission
- Game Conservancy Trust
- Gimingham, C H
- Glasgow City Council
- Hegarty, T
- Highways Agency
- Horticultural Trades Association
- Joint Links
- Joint Nature Conservation Committee
- Loch Lomond and The Trossachs National Park Authority
- Mammal Society
- Marine Biological Association
- Marine Conservation Society
- Martin, A
- Martin, B
- Midlothian Council
- Ministry of Defence
- Murchie, A

- National Biodiversity Network Trust
- National Council for Conservation of Plants & Gardens
- National Farmers' Union England and Wales
- National Farmers' Union Scotland
- National Gamekeepers Organisation
- National Trust
- National Trust for Scotland
- Natural England
- Ornamental Aquatic Trade Assoc Ltd
- Perth & Kinross Council
- Plant Link UK
- Plantlife International
- Reid, C T
- River Tweed Commission
- Rivers and Fisheries Trusts Scotland
- Royal Horticultural Society
- Royal Society for the Prevention of Cruelty to Animals
- Royal Society for the Protection of Birds
- Scottish Agricultural College
- Scottish Association for Marine Science
- Scottish Environment Protection Agency
- Scottish Natural Heritage
- Scottish Rural Property and Business Association
- Scottish Society for the Prevention of Cruelty to Animals
- Scottish Water
- Sea Fish Industry Authority
- Snowdonia National Park Authority
- South Lanarkshire Council
- Stancliffe-Vaughan, A
- Syngenta Bioline
- The Deer Initiative
- The Wildlife Trusts
- Thurlow Countryside Management R&D
- Tweed Forum
- UK Biodiversity Research Advisory Group
- United Utilities
- Veterinary Laboratories Agency
- Walbridge, A
- Watson, K
- West Lothian Council
- West Sussex County Council
- Wild Resources Limited
- Wiltshire County Council
- Woodland Trust
- Yorkshire Water
- Zylbersztajn, D

Annex B – Glossary

BASC	British Association for Shooting and Conservation
BTO	British Trust for Ornithology
Cefas	Centre for Environment, Fisheries & Aquaculture Science
DAISIE	Delivering Alien Invasive Species Inventories for Europe
FRS	Fisheries Research Services
GISP	Global Invasive Species Programme
IMO	International Maritime Organisation
IUCN	World Conservation Union
JNCC	Joint Nature Conservation Committee
NFU	National Farmers' Union
OATA	Ornamental Aquatic Trade Association Ltd
RAFTS	Rivers and Fisheries Trusts Scotland
RHS	Royal Horticultural Society
RSPB	Royal Society for the Protection of Birds
RSPCA	Royal Society for the Prevention of Cruelty to Animals
SAMS	Scottish Association for Marine Science
SSPCA	Scottish Society for the Prevention of Cruelty to Animals
TCM	Thurlow Countryside Management
UK BRAG	UK Biodiversity Research Advisory Group