



## Consultation response form - Invasive Non-native Species draft policy

Please submit your comments to [NonNativeSpecies.consultation@naturalengland.org.uk](mailto:NonNativeSpecies.consultation@naturalengland.org.uk)

Closing date 1<sup>st</sup> May 2009

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Organisation: Seafish	
<p>Seafish is a non-departmental public body that provides support to all sectors of the seafood industry. Seafish has a publicly stated commitment to “the sustainable and efficient harvesting of those resources on which the UK seafood industry depends, the protection of marine ecosystems, and the development of marine aquaculture based on sustainable resource utilisation and best environmental practice”.</p> <p>This response covers those aspects of Natural England’s draft policy that relate to the marine environment. It is not intended as a response relating to terrestrial or freshwater environments.</p>	
We support Natural England’s draft policy on Invasive Non-native Species	Y
<p>However, we would ask Natural England to be very mindful of what is termed as an invasive species and to be very aware of the potential economic impacts to the English (and UK) seafood industry that any of it’s actions could cause. In particular, we draw attention to marine species that were introduced intentionally by UK government for food production at a time when, rightly or wrongly:</p> <ul style="list-style-type: none"><li>- the impacts of climate change and increasing sea water temperatures were not seen to be the issue they are now, and</li><li>- most of the cultivation sites for producing these species were not designated European conservation sites, with the conservation objectives as exist today.</li></ul> <p>Furthermore, food security is becoming increasingly important in Government decision-making (<a href="http://www.defra.gov.uk/foodrin/policy/security.htm">http://www.defra.gov.uk/foodrin/policy/security.htm</a>) and will become a key issue in the future. Sustainable food production from the marine environment will be essential to the UK food strategy (“[reforms are needed to]...ensure our fisheries are properly valued and that they remain as an ever-renewable natural resource that can help feed a growing world population” - Speech by Huw Irranca-Davies MP at Policy discussion on African fisheries, aquaculture development, and food security, London - 24 November 2008).</p>	
1. Natural England believes that invasive non-native species pose a serious threat to terrestrial, freshwater and marine environments in England. This includes their potential impact on biodiversity, landscape, access and ecosystem services.	
Comments:	
<p>There is evidence that species are spreading and some of them could become invasive and then pose a serious threat to the environment. In some instances, the risk can be controlled (e.g. through strict procedures for any new intentional introduction, such as the ICES Code of Practice). In others (e.g. accidental introductions by whatever vector followed by spread from the original point of introduction), the risk can only be estimated</p>	

and where any adverse impacts arise then these need to be managed.

As Natural England says in its draft policy, species will arrive through the dynamic changing natural environment. Therefore, there will be changes to the marine environment and an element of change has to be acceptable rather than aiming for no change at all. There needs to be clarity from Natural England on its position on changing environments and the related movement of new species into new areas due to environmental change. Is Natural England trying to maintain the status quo in a changing ecosystem? In our opinion, 'no change' will be impossible to attain.

Also see comments under point 5 below.

Evidence to support comments:

While due concern should be given to any species posing a serious threat to biodiversity, there should be good scientific evidence on which to make a rational judgement. Sometimes the scientific evidence can be conflicting or there may be insufficient data on which to base a judgement.

In terms of ecosystem service value (or non-use value), this measure is not concerned with the 'nativeness' of a species but its fundamental life-support services. These include the improvements to water quality, detoxification and decomposition of wastes, regulation of climate, etc.

Can Natural England demonstrate that a non-native invasive species is one that always has a lower ecosystem service value than an indigenous species?

2. Natural England believes prevention of new invasive non-native species establishing in England is high priority. New incursions must be kept to a minimum and there must be rapid response to remove new invasions.

Comments:

Preventing harmful new invasive non-native species from establishing is a high priority. It would need agreement and a collaborative approach from a range of stakeholders. The resources to monitor for and remove every new incursion would be substantial and likely to prove impossible.

Evidence to support comments:

In terms of rapidly removing new invasions, the following paper offers a note of caution before committing to what may be ineffective actions:

"Viewing invasive species removal in a whole-ecosystem context" Erika S. Zavaleta, Richard J. Hobbs and Harold A. Mooney Trends in Ecology & Evolution Vol.16 No.8 August 2001.

There should be '.....a shift in emphasis from strict invasions management towards broader ecosystem restoration goals.....'

Also, see under note 4 below.

3. Natural England believes that a risk-based approach is required to assess non-native species. This approach should be based on the precautionary principle where potential impact or uncertainty is high.

Comments:

A risk-based approach is appropriate to assess the intentional movement of non-native species. The precautionary approach is appropriate until further information can be gathered through managed pilot scale trials. This was the case when introducing marine shellfish species and assessing their cultivation potential in the UK after the 1960s, where ICES guidelines were followed. Decisions were based on the best scientific information that

was available at that time.

Ref: S D Utting & B E Spencer, 1992. Introductions of marine bivalve molluscs into the United Kingdom – case studies. ICES mar. Sci. Symp., 194: 84-91.

The gathering of information to inform the precautionary approach should be with collaboration between the sector involved and its managers and regulators. In that way, 'buy in' by all concerned is more likely to be achieved.

Evidence to support comments:

The risk-based approach was followed when non-native species important to the shellfish industry (eg Pacific oysters, Manila clams) were introduced into the UK for mariculture after legislation was introduced in 1965 (Utting & Spencer, 1992 – see above). ICES guidelines were followed to ensure there was no risk of carrying disease, no threat from interbreeding with native species and no threat to biodiversity. This should also be the procedure followed with any new species introduced intentionally in the future.

4. Natural England believes that the adverse impact of existing invasive non-native species in England should be reduced.

Comments:

There would be no problem with this if all sectors and stakeholders that are affected are in agreement that the impacts are adverse impacts.

Evidence to support comments:

A Code of Practice was developed by the Menai Strait mussel industry and the Countryside Council for Wales after slipper limpets were found in the Menai Strait in 2007. This has led to the eradication of the slipper limpets in that area and a management plan is in place to prevent future introductions. The livelihoods of the industry and the conservation objectives of the site have both been protected. There has been a mutual understanding of the problem, a common goal and ultimately a gain to all parties involved.

However, we remain very concerned that the precautionary principle will be used unreasonably by Natural England to prevent the cultivation in England of what have become economically important species in the UK (as is being currently seen with the Pacific oyster).

5. Natural England believes that, where feasible, species populations, habitats and ecosystems that have been adversely affected by invasive species should be restored.

Comments:

This could be considered as an option but only where it is practical and feasible. Eradication may already be impossible to achieve (practically and/or financially) for some species. It would need several test sites to be established and then monitored to assess the likelihood of success. In European Marine Sites it may be possible to restore back to the 'favourable condition' (based on actual documented evidence) that the site was in when the site was designated. Is that evidence (species/feature position and abundance) available?

In other areas, what would be considered as the natural state to which a site should be restored – as it was in the 1900s, the 1960s – or even earlier? What would be the future for restored sites (species and features) in relation to any potential impacts from climate change? Would the restored species etc survive in the changed and changing environment?

Evidence to support comments:

Any attempts at restoration will need to have some achievable goals. Also, the effects of climate change on the further natural spread of species will need to be taken into account. Also, different sectors as well as different generations can have different perceptions of the

state of the environment. This can make it difficult to set and agree on appropriate targets for restoration of depleted and degraded environments.

6. Natural England believes that invasive non-native species impact on a range of sectors and stakeholders and co-ordinated action is required, as recommended by the Invasive Non-native Species Framework Strategy for Great Britain.

Comments:

There needs to be an understanding of what are invasive species (as opposed to naturalised introduced species) and their impacts (perceived v actual; positive v negative) between the sectors and stakeholders affected. This understanding and trust between sectors and stakeholders can be difficult to establish but it will be essential to establish both agreement and trust if any actions are to be co-ordinated.

Evidence to support comments:

The Pacific oyster is a species supporting the incomes and livelihoods of shellfish businesses in England. There is significant investment in the industry which has been rated as 1 out of 5 (with 1 being most sustainable) by a leading eNGO, the Marine Conservation Society. The industry views it as a naturalised non-native species, as do their French and Spanish counterparts, and very importantly their national governments. While English shellfish producers would work with Natural England to manage the wild stocks in England, they would not want this species to be considered as an invasive, non-native. There is still no conclusive evidence that wild settlements of Pacific oysters are always detrimental to the environment (see Alien Alert Report presented to the 2009 ICES Introductions and Transfers Working Group). The seafood industry would argue that there is evidence that Pacific oysters can increase species diversity. The mere presence of these oysters should not always be seen as threatening the conservation objectives of European Marine Sites.

It would be timely to review all the scientific data that are now available on the Pacific oyster and how stocks (cultivated and naturalised) could be managed to the benefit of all.

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