

# **Management measures for widely spread Invasive Alien Species (IAS) in Northern Ireland**

*Comments by*

**Northern Ireland Environment Link**

**23<sup>rd</sup> October 2019**

Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the environment of Northern Ireland. Its 65 Full Members represent over 90,000 individuals, 262 subsidiary groups, have an annual turnover of £70 million and manage over 314,000 acres of land. Members are involved in environmental issues of all types and at all levels from the local community to the global environment. NIEL brings together a wide range of knowledge, experience and expertise which can be used to help develop policy, practice and implementation across a wide range of environmental fields.

These comments are made on behalf of Members, but some members may be providing independent comments as well. If you would like to discuss these comments further we would be happy to do so.

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## General Comments

NIEL welcomes the opportunity to engage with the Department on the management measures for widely spread Invasive Alien Species (IAS) in Northern Ireland.

Invasive Alien Species are one of the biggest threats to our native flora and fauna. Often IAS carry communicable diseases and outcompete (or predate on) our native species. This has led to considerable declines in native populations. In financial terms, the cost of invasive species to the Northern Irish economy is estimated to be £46.5m per annum<sup>1</sup>. Therefore, urgent action is required to control, contain and eradicate IAS throughout NI. Furthermore, ongoing vigilance will be required to prevent new IAS from establishing a presence here.

We support the interventions referred to in the consultation – targeted eradication, awareness programs, local action groups, and research and development. These are all valuable and effective tools in the fight against IAS and should be used in combination as part of an overarching strategy.

We agree with the “three-stage hierarchical approach” to combating IAS as listed in the Principal Regulation – **prevention, early detection and rapid eradication**, and **long-term control and containment**. We believe this approach should be maintained after we leave the EU.

We welcome the proposed transposition of “the Union list” into local legislation as “Species of Special Concern” and support the Department’s continued efforts to eradicate and prevent the spread of IAS after we leave the European Union. Given that nature does not respect borders, we would encourage continued co-operation with cross-border bodies in the border regions to ensure effective action on IAS in these areas. We would also encourage continued support for the Invasive Species Ireland project<sup>2</sup> to tackle this issue on an all-island basis.

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<sup>1</sup> <https://invasivespeciesireland.com/wp-content/uploads/2010/03/Invasive-species-2013-4-web.pdf>

<sup>2</sup> <https://invasivespeciesireland.com>

Whilst we agree with the species included within the consultation, we would propose the addition of Japanese knotweed to the list. This species is endemic and presents a serious threat to existing buildings and the construction sector. Research has estimated that the cost of Japanese knotweed to the NI economy is £4.8m per annum<sup>3</sup>. This figure is likely to increase if left unchecked.

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

No

**Q2. What is your name?**

Connor McLean

**Q3. What is your e-mail address?**

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**Q4. Who do you represent?**

- Academia
- Animal rescue
- Animal welfare campaigner
- Aquatic interests/anglers
- Business
- Charity
- Commercial Fishery
- Conservation body
- Farmer
- Forester/woodland owner/manager
- Garden centre/retail outlet
- Government agency
- Horticultural Industry
- Individual Land owner & their representative body
- Local action group
- Local Authority

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<sup>3</sup> [http://invasivespeciesireland.com/wp-content/uploads/2010/07/Economic\\_Impact\\_Assessment\\_FINAL\\_280313.pdf](http://invasivespeciesireland.com/wp-content/uploads/2010/07/Economic_Impact_Assessment_FINAL_280313.pdf)

- Member of general public
- √ Non-Government Organisation
- Pet interest group
- Pet owner
- √ Professional and Membership Organisations/Agencies
- Trade association
- University/research institute
- Utility supplier
- Veterinarian
- Water supplier
- Zoo
- Other (please specify)

**Q5. What are your views on the proposed aims for the management measures set out in Appendix A?**

Regarding Nuttall's waterweed, Floating pennywort, Curly waterweed, Parrot's feather – these IAS not only threaten freshwater biodiversity but can also exacerbate flooding by restricting the flow of water. Rivers which are rich in biodiversity or are susceptible to flooding should be prioritised for IAS eradication. A combined cross-departmental approach which involves DfI Rivers could serve as a win-win for both biodiversity and flood alleviation. DAERA should also seek to provide information and training to angling groups and other waterway users in order to improve identification and reporting for IAS.

Given the risk to human health posed by Giant hogweed, we would recommend that eradication is urgently undertaken on any sites that can be accessed by the public.

Regarding the proposals for slider terrapins, we would recommend that the current standards for trading are reviewed – given that the species is typically kept as a pet. This review should consider a wholesale ban on the sale of this species.

Under the proposals for Grey squirrel, we would recommend that any eradication effort should focus on preventing Greys from establishing in areas where the Red squirrel is

present. We would also encourage close-working arrangements with local Red Squirrel Groups<sup>4</sup> operating throughout NI.

Under the proposals for the New Zealand Flatworm, we would recommend that horticultural products arriving from New Zealand are inspected before they enter the NI market, or (if detection methods are not technologically viable) that restrictions are placed on horticultural imports originating from New Zealand.

We believe that areas containing IAS which are in proximity to/or upstream from designated sites should also be considered for IAS management. Eradicating IAS in lower priority areas may help prevent them from spreading into higher priority areas (e.g. ASSIs).

**Q6. What are your views on the general management measures set out in Appendix B?**

We are generally in agreement with the general management measures set out in Appendix B.

We welcome the proposal to promote volunteer management of IAS. eNGOs and local community groups can draw upon local knowledge and a significant workforce of volunteers to assist in any IAS management effort. DAERA should consider providing funding, training and equipment to groups situated in IAS-vulnerable river catchments, designated sites etc.

**Q7. Are there any additional actions you think should be used as general management measures for particular widely spread species?**

No comments.

**Q8. Are there any actions that you think should not be used as part of a general management measure for a particular widely spread species?**

Regarding “trapping”, as referred to in Table 4, we would recommend against the use of traps which have the potential to catch non-IAS species.

Regarding “shooting”, as as referred to in Table 4, we would recommend against the use of lead shot. Mammals and birds may mistake spent ammunition for food, or may scavenge on

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<sup>4</sup> <https://www.ulsterwildlife.org/red-squirrel-groups>

unretrieved carcasses – this can result in lead-poisoning.

**Q9. What are your views on the proposed licensable management measures set out in Appendix C?**

NIEL agrees that there is merit in studying “species of Union concern” under licence and within a controlled environment. This may allow us to better understand IAS and develop more effective control measures.

**Q10. Are there any additional actions you think should be allowed as a licensable management measure for a particular widely spread species?**

No comments.

**Q11. 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 comments.