

An Invasive Alien Species Strategy for Northern Ireland – Draft Strategy

Summary of Consultation Responses

October 2011

Introduction

Background

1. On 24 March 2011, the Department published a consultation document, '*An Invasive Alien Species Strategy for Northern Ireland*', seeking views from stakeholders with an interest in/responsibility for invasive alien species. The full text of the consultation paper is available on the Department's website at:
www.doeni.gov.uk (click on Consultations).
2. There is a wide range of International, European and National policy drivers for the Strategy. Northern Ireland, as part of the UK, is committed to a number of International Conventions and agreements, such as the Convention on Biological Diversity (CBD), the Ramsar Convention and the Bern Convention, which require them to take account of invasive alien species.
3. In Northern Ireland, practical management of invasive alien species is challenging due to cross border implications of controlling introductions and spread. A pro-active stance is fundamental since prevention of introductions is demonstrably more cost-effective than reactive control or eradication measures.
4. The scope of the Strategy was to establish a coordinated policy and management framework that minimises the risk of invasive alien species to the economy, environment and society. It also sought to put in place new actions to address gaps
5. An effective framework to prevent the introduction and spread of invasive alien species is recognised as a long term process and the Strategy is seen as an effective and integrated system to address economic, environmental and social impacts.
6. Given the current economic climate and the fact that additional resources are unlikely to be available, the Strategy has prioritised a range of actions that will address invasive alien species and provide a firm foundation for future efforts.

Consultation Responses

7. The consultation period on the draft Invasive Alien Species Strategy for Northern Ireland ran from 24th March 2011 until 30th September 2011.
8. There were 29 responses to the consultation and of those who submitted comments:
 - 46% were from District Councils/central government
 - 30% were from conservation/NGO
 - 8% were from trade organisations
 - 8% were from professional bodies
 - 8% were from members of the public
9. The consultation posed fourteen specific questions and each question is addressed separately in the summary of respondents' comments, provided in **Annex A**. A list of all respondents is attached at **Annex B**.
10. No comments were received on the preliminary screening for Equality Impact Assessment contained in the consultation paper.
11. The majority of the respondents welcomed proposals to develop an Invasive Alien Species Strategy.
12. The Department plans to develop an Implementation Plan with key stakeholders during the next few months. The Implementation Plan will be the basis on which progress is monitored and reported on. Progress will be reported by the Department in liaison with various lead organisations. The Plan will guide the Strategy and will be part of the final document.
13. In their comments, consultees emphasised the following:
 - Strengthening of legislation and the development of national primary legislation;
 - The importance of widespread stakeholder involvement;
 - The need to raise awareness and understanding of the risks of invasive alien species;

- The need for adequate resources and funding was recognised;
 - Others were willing to facilitate training of volunteers about early detection, surveillance and responses, as well as, eradication, control and containment methods; and
 - Development of an Implementation Plan.
14. In response to the consultation responses individual points, the Department is conscious of the need for dedicated legislation in relation to invasive species. It is continuing to monitor developments on the development of an EU Strategic Framework on Invasive Alien Species, with the possibility of transposing this in future new legislation.
 15. It is also the intention to continue extensive engagement with the key stakeholders ensuring buy in to the proposed Implementation Plan. This engagement includes sharing best practice, and building on the skills, expertise and local knowledge available within these organisations and their wider membership. This should help target limited resources to where they are most effective.
 16. The continued commitment of working in partnership with Ireland in order to bring forward our individual strategy's in tandem is also important, as is the fact that such co-operation may provide future EU funding opportunities to address problems common to both jurisdictions' in dealing with the issue of Invasive Alien Species.
 17. The Department would like to thank all those who responded to the consultation. The consultation process will assist the Department in finalising the content of the Strategy. Further engagement with stakeholders will take place throughout the development of the Implementation Plan.

Consultation Question	Respondents	General Comments
Building on experience and working in partnership		
<p>1. The Strategy actions have been developed on the basis of tackling these issues must involve a strong and broad partnership approach.</p> <p>Do you, or does your organisation support this principle?</p>	<p>All</p>	<p>All were generally supportive and welcomed proposals to put in place a Strategy.</p> <p>RSPB commented on the need for clarity on the roles and responsibilities of stakeholders involved with invasive species.</p> <p>Another respondent commented on the importance of the cross-border dimension in measures to exclude new alien species and in protecting river catchments.</p> <p>Prevention and control of IAS requires commitment across all sectors including business and industry.</p> <p>Voluntary groups must be properly resourced and trained in the identification and mapping of invasive species.</p> <p>Single responsible 'Champion' authority should lead on the implementation of the strategy as a broad partnership approach can often lead to a lack of accountability.</p>

Our vision and the role of the strategy	
<p>2.</p> <p>Do you support the scope of the Strategy?</p> <p>Are there any key action areas not being addressed and how might they be addressed?</p>	<p>All</p> <p>The majority supported the scope of the Strategy.</p> <p>Antrim BC commented that the Strategy should consider the EU biodiversity target to halt loss of biodiversity and ecosystem services and to restore them as far as feasible by 2020.</p> <p>Another respondent felt that the scope of the Strategy was too narrow and that plant and animal health regulatory regimes should be included.</p> <p>The area of IAS is currently under resourced and delays will incur additional future costs for Northern Ireland. Therefore there is clear justification for investment in preventing species invasions and rapid response.</p> <p>In the current economic climate better engagement of NGOs with volunteers to carry out invasive alien control was suggested.</p>
Prevention and exclusion	
<p>3.</p> <p>Do you support the objective and priority actions?</p> <p>Do you have any suggestions or ideas for maximising the benefits to be gained from these actions?</p> <p>How can you or your organisation</p>	<p>All</p> <p>The majority supported the objective and priority actions.</p> <p>Newtownabbey Borough Council felt that stronger mechanisms should be considered to prevent the import and possession of high risk species and the control of the import and possession of all IAS at point of entry.</p> <p>Consideration should be given to expanding the legislation to</p>

	<p>help through your specific functions, role or responsibilities?</p>	<p>include species which pose less of a risk at present as there is the strong possibility that species which are not currently presenting a risk, could certainly do so in future due, for example, to climate change.</p> <p>More emphasis on action to address the problem of IAS that are well established and spreading is required, as well as, actions to prevent any further alien species arriving.</p> <p>Continue to develop the Codes of Practice in partnership with key sectors.</p>
<p>Early detection, surveillance and rapid response</p>		
<p>4.</p>	<p>Do you support the objective and priority actions?</p> <p>Do you have any suggestions or ideas for maximising the benefits to be gained from these actions?</p> <p>How can you or your organisation help through your specific functions, role or responsibilities?</p>	<p>All were supportive.</p> <p>Antrim BC suggested that consideration should be given to dedicated primary legislation that can assist with the rapid response recommended to deal with IAS.</p> <p>Some respondents were of the opinion that legislation which can assist with, and gives authority to implement a rapid response is required.</p> <p>Include a specific action for developing a training programme that will allow people in key positions - rangers, agency staff, and waterways workers, workers at key IAS pathways - to identify newly established IAS.</p> <p>Emphasis should be given to the fact that IAS are not simply a</p>

			problem for Government to identify and deal with.
Monitoring, recording and reporting			
5.	<p>Do you support the objective and priority actions?</p> <p>Do you have any suggestions or ideas for maximising the benefits to be gained from these actions?</p> <p>How can you or your organisation help through your specific functions, role or responsibilities?</p>	All	<p>All respondents were supportive.</p> <p>RSPB suggested that designated sites (ASSIs, SACs, SPAs) should be given special priority in monitoring programmes.</p> <p>Developers should be required as part of planning permission, to report any invasive species (and other biological records) identified by the project ecologist on development sites to the National Invasive Species Database.</p>
Eradication, control and containment			
6.	<p>Do you support the objective and priority actions?</p> <p>Do you have any suggestions or ideas for maximising the benefits to be gained from these actions?</p> <p>How can you or your organisation help through your specific functions, role or responsibilities?</p>	All	<p>All were supportive.</p> <p>Antrim BC felt that eradication, control and containment must be supported by primary dedicated legislation and this should be made a priority.</p> <p>Development of action plans must have associated resources made available to undertake action.</p> <p>A specific action is needed relating to offshore islands, which are particularly sensitive to IAS impacts</p>

Management, mitigation and restoration	
<p>7. Do you support the objective and priority actions?</p> <p>Do you have any suggestions or ideas for maximising the benefits to be gained from these actions?</p> <p>How can you or your organisation help through your specific functions, role or responsibilities?</p>	<p>All</p> <p>All were supportive.</p> <p>Antrim BC added that the restoration of the habitats after eradication and control should be mentioned in the Strategy.</p> <p>CVNI commented that the objectives need to be more focused on mitigation and restoration.</p> <p>On line toolkits should be comprehensive, practical and species specific. They should cover legislation and the impacts of IAS. Practitioners should be involved in the development of the toolkits e.g. business sector to ensure that more practical experience, not just scientific expertise, is included. This would lead to greater buy in from the sector concerned.</p> <p>To take full advantage of this objective, it should be extensively communicated to the construction sector. When a client (public or private sectors) is having pre-application discussions with Planning Service and/or submission of a planning application, the surveying of the development lands for invasive alien species should be mandatory in scoping or pre-works.</p> <p>Any management programme should be underpinned by education, training and the development of an evidence base for policy and decision making.</p>

Governance and co-ordination		
<p>8.</p> <p>Do you support the objective and priority actions? Do you have suggestions or ideas for maximising the benefits to be gained from these actions? How can you or your organisation help through your specific functions, role or responsibilities?</p>	<p>All</p>	<p>Majority were supportive.</p> <p>RSPB commented that the objective did not fully define and clarify the responsibilities of government departments, agencies and local authorities.</p> <p>The action “to formalise a co-ordination mechanism for joined up working across Government which identifies lead agencies, contact points and clear roles and responsibilities of stakeholders” was welcomed as key to dealing effectively with IAS. Management of IAS requires cross sectoral and government commitment.</p> <p>It was considered essential that the relevant agencies and public bodies are kept informed of their duty, responsibilities, and that co-ordination of these roles is effective.</p> <p>The formalising of the Steering Group should be a priority.</p> <p>A cross-party, cross-departmental technical working group on invasive species with representatives from all stakeholder bodies (e.g. farming community, civil society, recreational water users, Government Departments/Agencies, Local Authorities etc.) was suggested.</p> <p>Planners in both the public and private sector have a role to play in the communication, awareness and involvement in the joined up working across key stakeholders.</p>

			<p>It was noted that several Councils are already helping to deliver 'Action 22' through workshops on IAS for Council staff and other organisations. The commitment to deliver training for Local Authorities in conjunction with Biodiversity Officers and to provide a co-ordinating and information resource on IAS was welcomed.</p> <p>It was suggested that contractors who carry out work for Government and other Public Bodies, which may impact on the control of IAS, should be made aware of the importance of this issue and consider it when submitting tenders, etc. This should be included in procurement processes and management plans where external contractors manage or carry out work on publicly owned land.</p> <p>The continued operation of the Invasive Species Ireland project is essential to ensure co-ordination between NI and Rol. It is a mechanism for dealing with any issues between the two administrations, for example due to differences in distribution or threat in different parts of the island.</p>
Communications, awareness raising and capacity building			
9.	<p>Do you support the objective and priority actions?</p> <p>Do you have any suggestions or ideas for maximising the benefits to be gained from these actions?</p>	All	<p>All supportive.</p> <p>The majority considered awareness raising and capacity building to be crucial. They welcomed the fact that the objective includes the economic and social implications of IAS which were considered critical to both engender ownership of these issues both within government and amongst the general public.</p>

	<p>How can you or your organisation help through your specific functions, role or responsibilities?</p>		<p>Preventative measures are less costly than management and control. Therefore the awareness raising should reflect this and target the appropriate groups. The economic risks, not just the biodiversity risks, need to be highlighted when communicating with all sectors.</p> <p>It is important to engage members of the public. Many public groups and individuals with an interest in invasive species may be able to contribute to the management of invasive species.</p>
Improving the legislative framework			
10.	<p>Do you support the objective and priority actions?</p> <p>Do you have any suggestions or ideas for maximising the benefits to be gained from these actions?</p> <p>How can you or your organisation help through your specific functions, role or responsibilities?</p>	<p>All</p>	<p>Majority supportive.</p> <p>Antrim BC would encourage the effective use of existing legislation and the development of dedicated primary legislation on IAS.</p> <p>This objective is considered critical to delivering any Strategy on IAS and strong legislation is a priority to ensure their successful control. The rapid establishment of IAS in Northern Ireland needs to be tackled now.</p> <p>Without legislation, we will accrue future costs and indeed many species will become established and be too costly to address.</p> <p>Legislation is only valuable when it is enforced and extra resources must be made available to do this. Given that prevention is much less costly than cure, this should surely be a valid argument for</p>

			<p>provision of the extra resources required.</p> <p>Attention was drawn to the fact that Scotland recently published a draft of the Code of Practice on Non-Native and Invasive Non-Native Species. This Code provides practical guidance in respect of the release, keeping, sale and notification offences contained in the Wildlife and Natural Environment (Scotland) Act 2011.</p> <p>It was suggested that NI should consider developing a similar Code of Practice for IAS.</p>
Research and development			
11.	<p>Do you support the objective and priority action?</p> <p>Do you have any suggestions or ideas for maximising the benefits to be gained from this action?</p> <p>How can you or your organisation help through your specific functions, role or responsibilities?</p>	All	<p>All supportive.</p> <p>Respondents felt that any management strategies and control programmes must be underpinned by science both to ensure effective use of limited resources and public and political support.</p> <p>One observation was that invasive alien species associated with the fresh water environment and rivers may be a research priority, due to the ability of invasive alien aquatic plants to spread quickly through rivers and lakes and the expansion of invasive alien terrestrial plants where their seeds can be carried quickly along river corridors in flowing water.</p> <p>Those involved in practical land management (gardeners, foresters, wardens) have often developed locally successful control and eradication methods for dealing with specific invasive alien species, such as Japanese Knotweed (<i>Fallopia japonica</i>) and</p>

			<p>Rhododendron (<i>Rhododendron ponticum</i>). It is important that this experience is shared so that we have the best tools at our disposal to deal with the threats.</p> <p>It is important that funding for the Invasive Species Ireland project is continued as this is a useful forum to update the general public.</p>
Implementation, reporting and review			
12.	<p>What actions would you like to see in the Implementation Plan?</p> <p>How can you or your organisation help implement the Strategy through your specific functions, role or responsibilities?</p>	All	<p>The actions identified in this Strategy should form the starting point for an Implementation Plan. Those responsible for co-ordinating and executing the actions must be clearly identified and any resources required should be detailed. The Strategy needs to be reviewed regularly.</p> <p>Suggested Actions for inclusion:</p> <ul style="list-style-type: none"> • The development of primary national legislation to address pathways, early detection and response and containment and management of IAS. • The development of criteria to enable decisions to be made on whether to eradicate and/or control IAS • Effective education and awareness programmes targeted at specific interest groups. • A requirement for landowners to take responsibility – both private and publicly owned land. • Frequent reporting on the individual species or issues may certainly be required within each period. • Research – this is vital to demonstrate the requirement for and cost effectiveness of action to control invasive <p>Adequate resources need to be available to implement this</p>

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			<p>Strategy and NI legislation needs to follow swiftly after EU legislation is in place.</p>
<p>13.</p>	<p>Do you support the proposed review cycle?</p>	<p>All</p>	<p>Majority were supportive.</p> <p>While the majority of respondents supported the 5 year review cycle, it was suggested that flexibility should be a key consideration within this Strategy.</p> <p>There must be opportunity to ensure that there is flexibility within the process to deal with new species as and when they occur rather than waiting for a review. The Implementation Plan should have the flexibility to respond to new species as they arrive and amend priorities as situations develop.</p> <p>It is essential that this Strategy is reviewed regularly, and that it is a 'living' document, because the threats and challenges of invasive alien species will constantly change through time. The Strategy will need to evolve to meet these changes.</p> <p>There was a suggestion that the Strategy review should be linked to the NI Biodiversity Group's Report to Government.</p>
<p>Any additional comments</p>			
<p>14.</p>	<p>Are there any other comments which you would like to make on the proposals contained in this consultation document?</p>	<p>Antrim BC; Ballymoney, Coleraine, BCs; Limavady BCs; CNCC;</p>	<p>Additional comments included:</p> <ul style="list-style-type: none"> • All respondents welcomed the proposals contained in the draft Strategy; • The need for the Implementation Plan to be developed

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		<p>Countryside Alliance Ireland; UWT; RSPB; Biodiversity Officers Forum</p>	<p>outlining the delivery mechanism and be time bound;</p> <ul style="list-style-type: none">• Some respondents outlined ways in which their organisation could help inform the general public of the threats of invasive alien species;• There were comments on the need for adequate funding;• To investigate an all island approach to tackling invasive species.
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**List of Respondents to Consultation – An Invasive Alien
Species Strategy for Northern Ireland**

Respondent	Comment
Antrim Borough Council	
Ballymoney, Coleraine & Limavady Borough Councils	
Belfast City Council	
Biodiversity Officers Forum	
Causeway Coast and Glens Heritage Trust	
Conservation Volunteers Northern Ireland	
Council for Nature Conservation and the Countryside (CNCC)	
Countryside Alliance	
Craigavon District Council	
DARD Fisheries & Environment	
DETI Central Liaison Unit	No comment
Disability Action	No comment
DRD Water Policy	
Florida Fish and Wildlife Conservation Commission (Ruark Cleary)	
Greentown Environmental Ltd	
Newtownabbey Borough Council	
Northern Ireland Environment Link (NIEL)	
Northern Ireland Green Party	
Northern Ireland Judicial Appointments Commission	No comment
Northern Ireland Local Government Association (NILGA)	
Omagh District Council	
Ornamental Aquatic Trade Association	
Private Individual	
Quarry Products Association (NI) Ltd	
Roads Service	
Royal Town Planning Institute	
RSPB Northern Ireland	
Ulster Angling Federation	
Ulster Wildlife Trust	