



Department of
**Agriculture, Environment
and Rural Affairs**
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Northern Ireland
**Environment
Agency**

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

Summary of Consultation Responses

June 2020

Introduction

Background

1. On 11th September 2019, the Department launched a consultation on, 'Management measures for widely spread Invasive Alien Species (IAS) in Northern Ireland.', seeking views from stakeholders.
2. The consultation on the draft Strategy ran until 23rd October 2019.
3. The purpose of the consultation was to obtain views on management measures being considered by the Department for species of Union concern which are widely spread in Northern Ireland pursuant to Article 19 of Regulation (EU) No. 1143/2014 on the prevention and management of the introduction and spread of invasive alien species¹ ('the Principal Regulation').
4. The Principal Regulation requires effective management measures to be put in place for widely spread species, so that their impact on biodiversity, the related ecosystem services and, where applicable, human health or the economy are minimised.
5. The Invasive Alien Species (Enforcement and Permitting) Order (Northern Ireland) 2019² (the 'Enforcement Order'), which puts in place licensing provisions relating to management measures and sets out the penalties for breach of the restrictions in the Principal Regulation, defences and other enforcement-related provisions came into force on 1 December 2019.
6. In total, 24 responses were received.
7. A breakdown of those who submitted responses is as follows:-
 - 4 - District Councils
 - 4 - Central Government
 - 10 - Conservation Groups/NGO's
 - 1 - Trade Organisations
 - 1 - Transport
 - 1 - Academia
 - 3 - Members of the public
8. A summary of respondents' comments is provided in **Annex A** A list of all respondents is attached at **Annex B**.
9. No comments were received on the preliminary screening for Equality Impact contained in the consultation paper.
10. The majority of the respondents welcomed the management measures being proposed and were supportive of the Department's proposed approach.

¹ <https://www.legislation.gov.uk/eur/2014/1143/article/19>

² <http://www.legislation.gov.uk/nisr/2019/159/made>

11. In their comments, consultees highlighted that a number of well known IAS such as Japanese knotweed and Rhododendron have not been included.
12. The EU's FAQs explains about why some species were not listed - http://ec.europa.eu/environment/pdf/13_07_2016_QA_en.pdf .
13. In particular, the text relating to Japanese knotweed reads as follows:

“Some well-known IAS are not listed either because they do not have a risk assessment, the risk assessments did not include some of the information required by the Regulation, or there was insufficient evidence that the species meet the criteria for listing. In the case of giant hogweed and the Egyptian goose, the risk assessment at the time of the preparation of the first list was not complete, but has meanwhile been updated. Examples of species with a compliant risk assessment but with insufficient evidence on the compliance of the species with the criteria for listing are Japanese knotweed and the common ragweed. For the latter there was insufficient evidence that inclusion on the Union list would effectively prevent, minimise or mitigate their adverse impact. As a result, the IAS Committee decided that the listing would not be able to make a difference.”
14. Others queried why Muntjac deer are not included in the proposed management measures, as it is on the Union List.
15. In addition, we will give further consideration to how we can address a number of points raised in the consultation regarding:
 - the need to carry out research to provide best methodologies
 - the greater need for public awareness of the impacts of invasive alien species (IAS).
 - the need for greater co-ordination of effort to deal with these widely spread species
16. 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 management measures. *(Please also note that on page 4 of the Consultation paper, it described 10 species only. This was a typo was not reflected throughout the consultation paper, where the correct 11 species of concern to Northern Ireland were listed)*
17. It is anticipated that these will be published in July 2020.

Comments	Departmental Response
Q5. What are your views on the proposed aims for the management measures set out in Appendix A?	
<p>The majority of the respondents confirmed broad support for the management measures set out in Appendix A.</p> <p>Several references were made to dealing with Grey squirrel eradication and the potential for public outcry.</p> <p>Several queried why Muntjac deer are not included in the proposed management measures, as it is on the Union List.</p> <p>Respondents questioned why Japanese knotweed and Rhododendron were not on the Union List.</p>	<p>Grey squirrel control will continue to focus on areas where it will directly benefit red squirrels, e.g. red squirrel reserves and buffer zones in Northern Ireland.</p> <p>The presence of Muntjac deer in Northern Ireland is acknowledged, however there is not sufficient evidence to support the view that this species has gone beyond the naturalisation stage (No. of sightings, no widespread damage attributed to Muntjac)</p> <p>While the species is not widespread, the Department will continue to work with various stakeholders to contain the species in the original outbreak area.</p> <p>The EU IAS committee are responsible for the listing of species. Each species must fulfil a series of assessments on risk to be included taking account of the impact of each species across all Member States.</p>

Concern was raised on the sale of aquatic plants and in particular, the apparent lack of enforcement, as some freshwater species were still on sale at garden centres.

Some respondents, while they are supportive of the aim to eradicate slider terrapins in the wild as being valid, were concerned as to what the advice to terrapin owners will be who keep them as pets, given that *Trachemys scripta* is the only species on the animal list that are 'pets'

It was noted that time scales are also lacking and that having them would spur both the public and private sector into delivering action

Routine checks are currently carried out at garden centres by DAERA staff. The Department will act on any reports received from the public/stakeholders regarding the sale of invasive aquatic plants. The Department also promotes the 'Be Plant Wise' campaign.

Whilst Terrapins have been banned from sale since August 2016, Terrapin owners will be permitted to keep their pets until the end of their natural life, ensuring that they cannot breed or escape if they have owned them prior to that date. (August 2016 refers to the date that *Trachemys scripta* were listed in the EU list)

The Department will be periodically reviewing the actions listed in the Strategy. There are also targets laid out in the EU regulation, this sets timescales for various actions;

Article 13 - Produce action measures on the pathways of invasive alien species and identify the pathways which require priority action (within 18 months of adoption of list)

Article 14 - Produce a surveillance system of invasive alien species of Union concern, which collects and records data on the occurrence in the environment of invasive alien species by survey, monitoring or other procedures to prevent the spread of invasive alien species into or within the Union. (within 18 months of adoption of list)

	<p>Article 19 - Management measures of IAS that are widely spread shall have in place effective management measures for those invasive alien species of Union concern which the Member States have found to be widely spread on their territory, so that their impact on biodiversity, the related ecosystem services, and, where applicable, on human health or the economy are minimised. (within 18 months of adoption of list)</p> <p>Article 17 - Rapid eradication at an early stage of invasion. After early detection and within three months, Member States shall apply eradication measures and notify those measures to the Commission and inform the other Member States.</p>
<p>Q6. What are your views on the general management measures set out in Appendix B?</p>	
<p>It was highlighted that there has been a lack of coordinated action which has led to a number of management failures and that a more strategic management plan is required.</p> <p>It was suggested that the Department should make it an obligation to report species rather than “the encouragement of the reporting of new populations” as stated.</p>	<p>DAERA have in place an IAS strategy implementation plan. The Department is currently seeking updates from stakeholders on progression of targets</p> <p>DAERA already has good public interaction with the Public and Stakeholders with online and App recording systems. Adding a legal obligation to report IAS is not required and could have the effect of bringing legal proceedings to those who have a lack of understanding in the field of IAS</p>

It was also felt that the wording of bullet point 2, table 4 (“the ongoing encouragement of private collections and landowners to reduce or remove individuals over time”) was ineffective and could be strengthened to read: “the strict enforcement of regulations pertaining to the prevention of the spread of INNS through breeding programmes.” Simply put "encouragement", "ongoing encouragement", "engagement", "assisting" is simply not good enough.

With regards to animal welfare there is a concern that if euthanasia is the only option then the likelihood of releases will actually increase because realistically owners are unlikely to want to kill a much-loved pet.

Large landowners inclusion, no consistency across NI councils & more neighbour agreements required - coordinated landscape scale approaches – There needs to be demonstrated leadership from the public sector to empower action on invasives, support and encourage voluntary action through funding streams and actively discourage and penalise insufficient action from the public bodies that are active in facilitating the spread of IAS. It was also suggested that there is a need to include large landowners and land managers with greater focus on collaboration especially regards management across neighbouring lands.

It is felt that the Department should consider a more direct practical approach other than just ‘raising awareness’ i.e. DAERA should be carrying out research to provide best methodologies – e.g. alternatives to glyphosate given that many local authorities have passed motions to minimise / eradicate the use of Glyphosate.

The regulations are also clear in this respect – allowing an EU listed species to escape/spread from your control to neighbouring land is a criminal offence. Whilst the Department will enforce this as applicable, the main focus is on working with and encouraging good practice with landowners.

DAERA accepts these concerns, however it is anticipated that a direction or need to euthanize an animal will be rare. Companion animals will be allowed to live out the rest of their lives if the regulations on their keeping are adhered to.

The Northern Ireland Environment Agency (NIEA) currently engages with landowners who have invasive species present on their land. This will continue and escalate as resources permit.

DAERA liaise with counterparts across the UK and Ireland, sharing best practice in combatting IAS and current research in future actions for IAS spread/eradication such as biocontrol.

Several respondents suggested that the Department should set out fundable measurable targets for reduction in the distribution of all invasive species and consider providing financial support / funding, along with equipment & training to groups situated in IAS vulnerable river catchment areas, designated sites etc.

It was also suggested that consideration should be given to a strategic catchment level eradication plan for riparian plants.

It is critical that there is ongoing education of private horticulturalists, retailers, landowners and public gardens in the prevention of introduction and spread of invasive plants. One simple way to do this would be to introduce more accurate labelling of plants for sale so that gardeners can make informed decisions.

Also any guidance/information issued by the Department should be user friendly and not just written for and by ecologists.

With regards to private gardens/ponds the Department should provide specific guidance how to responsibly dispose of plants & aquarium species on the list, in order not to cause of panic in general public.

The Department has worked with landowners and has provided equipment to aid in the control of IAS. Under the Water Framework Directive, there are two management options for a water body at risk of failing to achieve good ecological status because of the impact of invasive alien species:

- where feasible and cost-effective, pursue eradication; and/or
- focus on local containment, preventing further spread into other water bodies within the same catchment or in neighbouring catchments. In any eradication programme, the benefits of eliminating alien species should be balanced against possible damage to other habitats and species through the removal process itself.

DAERA have been engaging with various stakeholders via campaigns such as 'Be Plant Wise' and 'Know What You Grow' for a number of years and will continue to do so.

In accordance with Departmental policy, all information and guidance published is user friendly

Management measures will be produced and will address what is required to dispose of plants and aquarium species on the list

Reference made that the management measures for some plants seem to be missing i.e. Rhododendron, Japanese knotweed (most commonly mentioned), cherry laurel, pheasant berry, salmonberry, winter heliotrope, Virginia creeper (not present in NI) & snowberry.

Creative thinking should be utilised to lever skilled, interest groups to focus on key issues through citizen science type volunteer projects e.g. monitoring grey squirrel presence/absence. These projects should be facilitated and funded by the statutory bodies.

It was noted that the implementation of Pathway Action Plans (PAPs) is referenced under bullet point 3, however, as far as the respondent was aware there are no PAPs completed so far and unclear as to the status of their implementation in Northern Ireland.

This consultation addresses only those species that are contained within the EU list.

(Should a land owner/developer wish to excavate and remove invasive weeds such as Japanese Knotweed from a site, then the removal and disposal must be carried out in line with current controlled waste regulations. Further advice can be obtained here;
<https://www.daera-ni.gov.uk/DutyofCare>)

Long-term grey squirrel management will continue to be undertaken, where funding allows, largely by volunteers and land managers, with support and coordination from the organisations involved, including the Department.

NI. Angling, Zoos & Recreational Boating PAPs completed will be published on UK wide basis.

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

Correct, up-to-date information needs to be made more accessible to the general public to inform them on what damage IAS can do, and how to tackle this issue.

A good network of species-specific groups (employees or volunteers) to target IAS in key areas to prevent their spread.

Campaigns, such as Check Clean Dry and Be Plant Wise, need to be prominently seen in transport terminals or recreation grounds as carelessness can lead to IAS spreading elsewhere.

The Departments webpage on IAS contains useful information. The Department will assess the contents and add further information as necessary. The Invasive Species Ireland website Twitter and Facebook accounts provide full and regularly updated information on invasive species prevention and management.

All NI Councils have been provided with these resources as have organisations such as Translink, all of whom promote these campaigns via their biodiversity officers. NI airports support awareness by making information leaflets available to travellers, and it is hoped that similar will be rolled out at the seaports. Centres such as Oxford Island have all the leaflets & posters including Asian hornet. All DAERA country parks have leaflets & posters. Recreation staff in all councils undergo training from DAERA staff.

All leaflets & posters are downloadable from ISI website.

NIEA are actively promoting the campaigns at transport terminals, garden centres, fisheries. NIEA engagement is routinely reviewed to ensure best possible exposure.

It is necessary that everybody (stakeholders retailers, business owners, the public, etc.) need to be aware of the threats that IAS pose.

Possibility of using biocontrol or contraceptives to slow down the spread of IAS; essential to test and know that these biocontrol measures won't affect non-target species.

"All Ireland Non-Native Invasive Species Plan" to have an island approach to this issue, including having a reliable way to record and map invasive species including the local management plan, and area cleared or number of animals dispatched.

NEA, alongside counterparts in DAERA, Local Council and community groups, publicise the threats posed by IAS on our native species. This awareness program is further enhanced by the Departments participation annually in Invasive Species Week and attendance at agricultural & game shows. DAERA will continue to review awareness programs to ensure target audiences are properly informed.

DAERA continues to monitor research developments in dealing with IAS and may carry out further research as applicable

DAERA works closely with colleagues in Ireland, and also those in the other UK nations, and also the Isle of Man, Jersey and Guernsey. DAERA recognises the value of these close working relationships and will continue develop plans/actions alongside partners to aid in combatting the threat of IAS

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?

In general most responses to the consultation had **no proposed** actions that should not be used as part of general management measures for widespread species.

Other responses emphasised the following methods should not be used:

- Species - The grey squirrel - The use of non-approved contractors and inhumane methods for culling
- DEFRA recommended techniques to control grey squirrels require review as from a public perspective they can be perceived as inhumane. With increasing emphasis on animal welfare, techniques such as drowning are not appropriate.
- Recommend against the use of traps which have the potential to catch non-IAS species.
- Recommend against the use of lead shot. Mammals and birds may mistake spent ammunition for food, or may scavenge on unretrieved carcasses – this can result in lead-poisoning.

DAERA thanks respondents for comments.

The Department is focused on ensuring the most Humane methods are used in controlling invasive alien species. Where it is established that inhumane methods are being employed, the Department will investigate and take the appropriate enforcement action.

The issue of leadshot in shotgun ammunition is being discussed across all 4 administrations

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

Concerns about *trachemys scripta* being 'pets' and not wild animals. If euthanasia is the only option then the likelihood of releases will actually increase because realistically owners are unlikely to want to kill a much-loved pet. Therefore it is believed this species on the list needs a different approach to management, other than just eradication. Advice to terrapin owners who continue to keep these as 'pets' is of prime concern.

It is vital that whatever management measures that are agreed under Q9 that these can be replicated easily for other species kept as companion animals in domestic settings or as part of private collections. e.g. raccoon dogs.

Ensure enforcement is carried through when complaints are lodged. The experience of some Red Squirrel Groups is that when a complaint is lodged after grey squirrels are captured, transported and released, no action is taken (even when the person undertaking the action is known).

Animals that are kept in captivity must be kept only in appropriate facilities which provide for their welfare needs. Clarification is therefore sought on whether these establishments will be defined in law and subject to some form of regulation. Clarification also sought under what circumstances a licence would be granted for an animal to be kept in captivity to prevent its release back into the environment.

The keeping of IAS animal species that were obtained prior to being included in the EU list can continue with the present owner under the rules for companion animals. The keeping of these specimens must be controlled to prevent escape, breeding and their numbers mustn't be added too.

The IAS regulations bring into operation new powers for NIEA to control IAS listed on the EU list.

Permits/Licences to keep animals will only be considered in line with the welfare requirements of the animal. Permissions can only be granted for the purposes of research on eradication methods. Any animal that is listed in the EU list will not be permitted to be released back into the environment.

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

Reports should be generated to update on progress on eradication.

It was recommended that the licensed movement of Pine Martens where they can form part of an eco-solution for grey squirrel management may be worth considering.

Suggestion to establishment a specialised mobile regional IAS response team equipped with specialist knowledge and skills to target the full range of IAS within priority areas, and capable of delivering a coordinated strategic response. This could be carried out in partnership with local businesses, underpinned with early warning systems and rapid response plans. Another suggestion is for IAS fauna must be included in future woodland management schemes and other appropriate Agri-Environment Schemes (AES). Currently no IAS fauna are highlighted as requiring control and future payments should be calculated and designed around these additional costs

NIEA is considering the way forward on reporting progress on eradication methods.

It is suggested high densities of pine martens lead to the natural reduction in grey squirrels and this has led to localised increases in red squirrel numbers. Although the mechanism of the impact the pine marten is having is unclear, it is more complicated than a basic predation factor. Clearly martens will predate red squirrels too but it is believed because the two species have co-evolved together the reds know how to survive with the martens. Scientific research is continuing in this field in Ireland and Scotland.

The Department welcomes all ideas focusing on combatting the threat of IAS. All suggestions will require assessment to ensure resource allocation is efficient and suitable for the potential threat that IAS pose in Northern Ireland.

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?

Respondents felt that widespread herbicide spraying or use in water should not be allowed. It was also suggested that there should be reduced reliance on pesticides for the control management of the invasive species. The Department should consider investigating more cultural methods.

It was emphasised that increased public awareness campaigns are needed to avoid potential social conflict, given that the controlled capture and translocation of IAS to a secure, licensed facility is likely to be more favourable to the public, for animal species, than culling/euthanasia.

Concern was raised about the potential use of chemicals after Brexit that are currently banned in the EU and questioned if the status quo would remain.

The Department will never recommend the use of herbicides in or near water without first exhausting the options for mechanical or biological methods

DAERA are duty bound to ensure that the regulations are adhered to. Where possible the Department will explore all potential options regarding the control of IAS, to reduce any potential social conflict to a minimum.

At the point of Exit the whole of the UK will be aligned with the EU, outside of issues relating to the NI Protocol, it is likely over time that there will be a degree of divergence between GB / UK and the EU. However, it should be noted that the UK will still be part of overarching chemicals related international agreements and Conventions.

**List of Respondents to Consultation –
Management measures for widely spread Invasive Alien Species (IAS) in
Northern Ireland**

No.	Respondent
1.	Antrim & Newtownabbey Council
2.	Belfast City Council
3.	Derry City & Strabane District Council
4.	Lisburn & Castlereagh City Council
5.	DfC – Historic Environment Division
6.	DfE – Minerals & Petroleum
7.	DfI – Roads and Rivers
8.	Translink
9.	DoJ
10.	CNCC
11.	National Trust NI
12.	Northern Ireland Environment Link
13.	RSPB
14.	Ulster Wildlife
15.	Woodland Trust
16.	Belfast Hills Partnership
17.	Lagan Valley Regional Park
18.	BASC
19.	Glens Squirrel Group
20.	Ornamental Aquatic Trades Association
21.	Queens University of Belfast
22.	Edward Davies
23.	Conor McGuinness
24.	Conor McKinney