

## **Joint Nature Conservation Committee response to departmental consultation on *The Invasive Non-Native Species Framework Strategy for Great Britain***

### **1 Background to response**

The Joint Nature Conservation Committee (JNCC) is the statutory adviser to Government on UK and international nature conservation. Its work contributes to maintaining and enriching biological diversity, conserving geological features and sustaining natural systems. JNCC delivers the UK and international responsibilities of the Council for Nature Conservation and the Countryside, the Countryside Council for Wales, Natural England and Scottish Natural Heritage.

The JNCC is represented on the Non-native Species Programme Board for coordinating actions on non-native species in Britain and works closely with the nature conservation country agencies in Britain to respond to the threats posed by non-native species to native biodiversity. The JNCC has recently discussed (Non-native Species: JNCC's future priorities: JNCC 07 P02, March 2007) its forward programme of work in this area, which includes activities to support the UK Overseas Territories in tackling their significant problems associated with non-native species.

### **2 General points**

As well as responding to the numbered consultation questions, the JNCC would like to emphasise the following key general points

- Funding for implementing the Strategy and for dealing rapidly with newly-arrived problem species should be identified as a distinct funding stream to improve the delivery of the work and accountability of the budget.
- In the absence of a biosecurity agency (that would bring together all aspects of dealing with non-native species and diseases under the leadership of one organisation), the membership of the Non-native Species Programme Board needs to become more representative of the key sectors concerned, notably the non-governmental organisations and commercial interests as well as stronger links with those responsible for dealing with diseases. When much of the Strategy is to be delivered by partnerships with these bodies (outside government) it is essential to involve them with the planning and decision-taking at the highest level (the Programme Board).
- A mechanism for resolving any disputes or conflicts of approach between countries or regions needs to be established to ensure that the devolved and delegated way of working has embedded within it a means of ensuring consistency and joint working at all levels.

The following specific points have also been identified when preparing the consultation response; these relate more directly to biodiversity conservation issues that are the special concern of the JNCC.

- Non-native species issues in relation to climate change need to be clarified so that decisions are informed by an understanding of the effects of climate change without displacing concerns about addressing the adverse impacts of non-native species.
- Economic impacts and issues (problems of costing the impacts on human interests and biodiversity) require more work to give a realistic appreciation of the consequences of the arrival and spread of non-native species that can be clearly understood by policy makers and decision takers. While these economic aspects are of much wider concern than for biodiversity conservation alone, placing biodiversity within a framework for assessing economic impacts is important to understanding the full economic costs of non-native species. This is particularly the case for investigating the impacts of non-native species on ecosystem services.
- Biodiversity impacts of non-native species need to be better understood and responded to in GB. While the impacts may be known in general terms, the effects of non-native species upon different ecosystems and their constituent assemblages need to be quantified and assessed for at least some case examples.
- More emphasis should be given to dealing effectively with non-native species in freshwater and marine ecosystems. This could be addressed in the first instance by establishing working groups to report to the Non-native Species Programme Board that would have responsibility for developing work programmes in these areas to implement the Strategy.

Dr Ian McLean  
Joint Nature Conservation Committee

# GB Invasive Non-Native Species Framework Strategy – Consultation Response Form



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 Organisation: Joint Nature Conservation Committee

Please indicate which category of organisation you represent: Government (Incl. Agency/NDPB)  
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## PUBLICATION OF RESULTS

Are you responding: a) As an individual (Please go to c)	Yes: <input type="checkbox"/>	No: <input checked="" type="checkbox"/>
b) On behalf of a group/organisation (Please go to e)	Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>

### INDIVIDUALS

c) Do you agree to your response being made available to the public (in the relevant GB Administration library and website and/or on the non-native species secretariat website)? If Yes, please go to d. If your answer is No we will treat your response as confidential.	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
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d) Where confidentiality is not requested, we will make your response available to the public on the following basis (please tick one of the following boxes)

Yes, make my response, name and address all available.	<input type="checkbox"/>
Yes, make my response available, but not my name or address.	<input type="checkbox"/>
Yes, make my response and name available, but not my address.	<input type="checkbox"/>

### RESPONSE ON BEHALF OF GROUPS OR ORGANISATIONS

e) The name and address of your organisation will be made available to the public (in the relevant GB Administration library and website and/or on the non-native species secretariat website). Are you also content for your response to be made available? If your answer is No we will treat your response as confidential.	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
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## SHARING RESPONSIBILITIES/FUTURE ENGAGEMENT – ALL RESPONDENTS

We will share your response internally with other policy teams in GB Administrations who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content to be contacted again in relation to this consultation response?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
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## GB Invasive Non-Native Species Framework Strategy – Consultation Response Form - 2

**THE QUESTIONS IN THE DRAFT STRATEGY ARE REPRODUCED UNDER EACH CHAPTER HEADING BELOW. PLEASE TICK WHERE APPROPRIATE AND INCLUDE ANY COMMENTS IN THE SPACE PROVIDED.**

### 1.) INTRODUCTION

**1) 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 this strategy?**

Yes:       No:

**Comments:** In practice for many cases it will be hard to distinguish non-native species driven here by climate change from those that arrive following range extensions due to other causes; similarly it can be difficult to separate those species that arrive through their own dispersal mechanisms from those that arrive as a consequence of human activities. Non-native species that are invasive and arrive here following range extensions resulting from climate change should be within the scope of the Strategy, but in practice it will not be possible to prevent the establishment of many of these species and there is little point in repeated attempts to eradicate them unless they pose major threats to biodiversity (e.g. Water Primrose), economic activities (e.g. Colorado Beetle) or human health (e.g. West Nile Virus) or unless their removal is easy and inexpensive. Thus, although a consistent policy might be desirable to deal with those non-native species responding to climate change, in practice many of the decisions will depend upon trade-offs between the likely damage caused (more damaging species will be a higher priority for both prevention and eradication) and the costs of prevention and eradication (lower costs make it more worthwhile to prevent arrival or to eradicate when a non-native species arrives).

**2) Do you agree that the eight key recommendations of the 2003 report remain valid?**

Yes:       No:

**Comments:** Yes, these eight Key Recommendations remain valid, although with the benefit of subsequent experience, an additional Key Recommendation to seek to link the non-native species policy to the related issues of prevention and management of human and animal diseases will be very beneficial. The current lack of such linkage is a significant weakness of the current arrangements in GB and is likely to continue to be a significant problem in the absence of a biosecurity agency charged with leading all the areas of non-native species work (including management of plant, animal and human diseases).

**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 these areas and how might they be addressed?**

Yes:       No:

**Comments:** Within GB, a new area of action is to incorporate other stakeholders, particularly in the commercial sector and with non-governmental organisations (some of whom attend the Stakeholder Forum) within the Non-native Species Programme Board to improve the capacity for informed decision-taking and joint action for non-native species problems. A second area where stronger action is essential within GB is to secure sufficient funding to deliver the three tier approach (prevention, management/control and surveillance); at present there are insufficient resources available in GB, particularly to prevent problem species arriving and becoming established, to take rapid effective eradication where required and to find out what is happening on the ground and share the resulting information. Finally, there is the need to support the UK Overseas Territories (UKOTs) and raise their capacity to deal with the problems of non-native species. Currently, the impact of non-native species on biodiversity and on human interests in the UKOTs is considerable (in many cases proportionately greater than in GB), but there is little organised response and a grave lack of resources. A separate exercise to consult with the UKOTs and develop a strategy for them is required urgently.

**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?**

Yes:       No:

**Comments:** The JNCC supports the principle of strong partnership working between all stakeholders, but also recognises that not all organisations have sufficient resources available to fulfil their various functions and roles adequately, so that there must be partnership working and agreements based upon realistic plans and budgets. The audit

<p>of organisations responsible for dealing with non-native species, commissioned by Defra and reporting in 2006, should be a basis for building a clearer picture of the resources currently devoted to tackling non-native species and identifying both gaps and duplication in roles and resourcing. Once that picture is available, putting in place a funding stream to deal with non-native species is essential to deliver this work and make it clear what resources are available at a GB level for prevention, surveillance and eradication. Under the model led by the Non-native Species Programme Board the majority of the funding for operational management and control is likely to remain with agencies, local authorities and non-governmental organisations.</p> <p>Partnership working has considerable strengths in terms of gaining ownership of the problems by the different sectors concerned and involving all the best talents in finding and implementing practical solutions to the problems. However, there are risks as well, notably slow decision-taking, poor and uneven funding, potential duplication of effort and leaving gaps that are not addressed. Being aware of these risks and drawbacks and taking steps to mitigate and manage them will be an important role for the Non-native Species Programme Board (and would be the same challenge if a biosecurity agency was established to lead the work).</p>	
<p><b>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?</b></p>	<p>Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/></p>
<p><b>Comments:</b> The JNCC strongly supports the proposed shift towards an increased emphasis on a more preventative approach in order to reduce future damage to biodiversity and other interests, as well as to save on costly eradication and control measures to deal with damaging non-native species that become established in Britain. For marine ecosystems, where management and control options are very limited and eradication almost impossible, the imperative behind a shift to a more preventative approach is even stronger.</p>	
<p><b>6) Do you foresee any significant pitfalls or opportunities in making this happen?</b></p>	<p>Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/></p>
<p><b>Comments:</b> It will be hard to achieve the annual Government investment needed to improve and sustain improved prevention measures. Historically, Governments in Britain have been resistant to the concept of spending to prevent problems, even where the costs of prevention are much smaller than funding the remedy (for example, foot and mouth disease). The other major constraint is likely to be the need for improved collaboration and joint working between the organisations responsible for delivering improved prevention. The major opportunities for improving prevention include increasing awareness internationally that prevention is better than cure (also driven by international conventions, agreements and initiatives), coupled with the growing realisation that eradication, or long term management programmes for non-native species, are very expensive options.</p>	
<p><b>7) Do you have any other comments on Chapter 1 - Introduction?</b></p>	<p>Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/></p>
<p><b>Comments:</b> Following publication of the 2006 audit, it is highly desirable to build on this with appropriate follow-up work, in order to improve the effectiveness of the current arrangements coordinated by the Non-native Species Programme Board. This should include clarification of the responsibilities for taking major decisions, including rapid intervention and the triggering of eradication initiatives so that when new problem species arrive there is a rapid and effective response, rather than the current delays and uncertainties.</p>	

2.) STRATEGIC AIMS	
<p><b>8) Do you agree that the statement of Strategic Aims captures the scope of what is needed?</b></p>	<p>Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/></p>
<p><b>Comments:</b> The statement of Strategic Aims generally captures the scope of what is needed, although the relationship of the Strategy to wider biosecurity concerns (including human and animal diseases) needs to be clarified and made explicit so that prevention and rapid intervention responses are well-coordinated between the non-native species and disease areas.</p>	
<p><b>9) Do you have any other comments on Chapter 2 – Strategic Aims?</b></p>	<p>Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/></p>
<p><b>Comments:</b> A major challenge in delivering these aims is that funds need to be made available quickly so that responses can be initiated as soon as problems arise. This is where contingency plans need to include realistic costs for</p>	

rapid reaction in response to the detection of the arrival of a damaging non-native species. However, these funds will be substantially offset when remediation costs, or the economic costs to businesses/industry are taken into account. Cost-benefit analyses should be considered when seeking and allocating resources to deal with non-native species.

**GB Invasive Non-Native Species Framework Strategy – Consultation Response Form – 3**

**3.) SCOPE AND TERMINOLOGY**

**10) Do you agree with paragraph 3.1 that this strategy should aim to set out a high-level strategic game plan for the GB administrations and their related bodies whilst providing sign-posts for other non-governmental regional or local programmes and initiatives?**

Yes:  No:

**Comments:** Yes, the Strategy should set out the high level game plan, but for this to be effective it is important that the respective roles of different government organisations are clear and that there are mechanisms for agreeing joint actions between these organisations (responsible for different duties or for different geographical areas). These mechanisms will require the option of using more formal and binding arrangements than “sign posts”, at least on some occasions. For example, there needs to be consistency of delivery for eradication or control of established non-native species for neighbouring geographical areas (whether at the country, regional or local levels) otherwise the actions within one area will be undermined by a neighbouring area adopting a different approach. This is also relevant when considering species that are native to one country, but not to a neighbouring country (including the issue of preventing the colonisation of offshore islands by species that are native on the nearby mainland).

There also needs to be a mechanism established to resolve disputes between different countries (or other geographical areas), or between different organisations, concerning the implementation of the Strategy. This mechanism would be called in to play only when there were differences that could be settled by direct dialogue between the parties concerned.

**11) How do you think that this process can work best so that the strategy adds value to non-governmental programmes and initiatives?**

**Comments:** There needs to be strong engagement between government and non-governmental organisations to ensure that there is consistency and mutual support between governmental and non-governmental policies and initiatives. This can be achieved by examining the ways in which different organisations (government, commercial and other non-governmental bodies) come together to tackle non-native species issues. The Non-native Species Programme Board should be strengthened by including representatives from non-governmental organisations and the commercial sector to improve the expertise available within the group, as well as the understanding of the views and concerns from these sectors. Such strengthening of the Programme Board would also help build the partnerships and mutual understanding that the Strategy is greatly dependent upon for its success.

**12) Do you agree with the approach described in paragraph 3.3?**

Yes:  No:

**Comments:** The current arrangements for delivering what has been termed biosecurity (which at its broadest can be defined as measures designed to counter threats from dangerous organisms) are complex in Britain. The separation of key functions (policy, legislation and operational responsibilities) for dealing with non-native species, plant and animal diseases and human health respectively, means that there is a lack of overview and integration when dealing with the health of ecosystems, domesticated species and people threatened by species and disease organisms from abroad. While few countries have gone down the route of creating a biosecurity agency to bring these functions together in one government organisation (a notable exception being New Zealand), there are considerable merits in bringing together biosecurity measures to prevent the arrival of dangerous organisms (for example by integrating defences for specific pathways to deal with macro-organisms and their associated diseases) and responding rapidly to their establishment (by consolidating surveillance measures and putting in place clear and well-understood ways of taking the necessary decisions quickly and accountably). In the absence of establishing a biosecurity agency in GB, which is not currently being given serious consideration, the relationship between dealing with those non-native species issues coming under the Strategy and those dealt with elsewhere (notably diseases) should be clarified.

In order to make the approach described in 3.3 stronger with respect to establishing more robust biosecurity in GB there is the need to at least formalise and bring together the different organisations dealing with non-native species, plant and animal diseases and human health. At the minimum this may involve the Non-native Species Programme Board opening dialogue with the other authorities in order to agree respective responsibilities and how decisions will be taken when there are shared responsibilities (e.g. the threat of non-native species carrying non-native pathogens into GB). A greater degree of effectiveness can be achieved by sharing across the different sectors aspects such as organising surveillance

and sharing information, as well as operational responsibilities for preventive measures for priority pathways, and advisory and other support for top-level decision-taking by Ministers or senior officials. Communicating key messages to the public, particularly in the area of prevention, will be more effective if messages on non-native species and diseases are consistent and mutually supportive.

**13) Do you have any other comments on Chapter 3 – Scope and Terminology?** Yes:  No:

**Comments:** There is the need to agree what are native and non-native species for the countries within GB, and for their respective offshore islands, so that coordinated action is possible to deal with both species that are non-native with respect to GB as whole as well as species that are non-native to particular areas of GB. This requirement, to look at what are native and non-native species at a scale that is smaller than GB, is essential if the regional and local character of biodiversity is to be sustained in the terrestrial, freshwater and marine environments.

The relationship of this Strategy to the development of future work on non-native species in the UK Overseas Territories and Crown Dependencies should be considered carefully. There are serious problems arising from non-native species in many of these countries, both for biodiversity conservation (particularly on islands with rich biodiversity) and for human health and economic interests. Because the circumstances in these countries are different from those in GB it will be necessary to develop appropriate mechanisms to suit the local conditions, as well as make the necessary funds available to support local delivery of improved preventive measures, surveillance and eradication or control (see also JNCC responses to Questions 3, 17, 24, 33, 46 and 50). The JNCC is keen to assist with developing work in this area in collaboration with other appropriate partners.

#### 4.) THE GB NON-NATIVE SPECIES MECHANISM – ROLES AND RESPONSIBILITIES

**14) Do you feel that the GB Non-Native Species Mechanism has all the key components to oversee delivery of this strategy?** Yes:  No:

**Comments:** In JNCC's view, the Non-native Species Programme Board needs to be strengthened by including representatives from additional organisations whose participation is essential for delivering the Strategy (notably the commercial sector and non-governmental organisations) and by better arrangements for dealing with the freshwater and marine spheres. Engagement with the commercial sector at a high level is imperative to achieve the involvement and active participation of business with the Strategy and with taking the key decisions for its delivery. Partnerships with non-governmental organisations will be crucial for successful delivery of the Strategy. A new working group to tackle the problems of non-native species in freshwater habitats is needed to bring together the different aspects and come up with stronger generic prevention measures. A new marine working group to support the Non-native Species Programme Board would be an effective way to ensure that the distinctive and challenging issues concerning non-native species in the marine environment are dealt with more effectively. This working group will need to be represented on the Non-native Species Programme Board by a person with a good understanding of the marine environment and its distinctive policies and legislation. The Secretariat supporting the Non-native Species Programme Board is working very effectively in a supporting role to the Programme Board, in coordinating different activities and by disseminating information to key players and stakeholders. However, the size of the Secretariat and the resources available to it will need to be kept under review to ensure that the unit remains effective as it takes on more duties in delivering the Strategy. Some expansion of capacity here may be necessary in the medium term. A danger inherent within the current GB non-native species mechanism is the complexity of the arrangements, with multiple organisations involved, often with similar or overlapping duties and responsibilities. These arrangements will need clear leadership and direction, coupled with rapid and accountable decision-taking, if they are to deliver the Strategy and deal with the problems arising from non-native species more effectively in future.

**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?** Yes:  No:

**Comments:** JNCC believes that the Non-native Species Programme Board would benefit from inclusion of representatives from some additional sectors. This will increase the ownership of the Strategy by key groups and should improve the decision-taking through broadening the views and experience available. Since the draft Strategy relies extensively upon industry, non-governmental initiatives and volunteer programs for its success, there needs to be representation for such groups. In particular, appropriate representatives from industry and the NGOs should be invited to join the Non-native Species Programme Board soon. It should be noted that representatives from industry and the NGOs have made significant contributions to the drafting of the Framework Strategy that is the subject of this



consultation.	
<p>The Stakeholder Forum needs to be marketed to a wider audience, given the heavy attendance by government and government departments at the latest Forum. While this is welcome in demonstrating positive engagement within government, it is clear that the relationships with landowners, trade and industry bodies and other non-governmental organisations is rather limited at the current time. Nevertheless, the Forum has been successful in bringing together key players and thereby promoting information exchange and better understanding.</p>	
<b>16) What pitfalls or difficulties do you foresee the GB mechanism will need to address?</b>	
<p><b>Comments:</b> There are three major difficulties to be addressed:</p> <ul style="list-style-type: none"> <li>• Convincing the Government to invest in stronger preventive measures as part of an enhanced GB biosecurity.</li> <li>• The need to take key decisions quickly in response to the arrival of potentially damaging non-native species backed up by the necessary resources to deliver the operational actions.</li> <li>• Gaining sufficient support in key sectors and among the general public to build support for prevention and a positive view of the aims of the Strategy.</li> </ul>	
<b>17) Do you have any other comments on Chapter 4 – The GB Non-Native Species Mechanism?</b>	<b>Yes:</b> <input checked="" type="checkbox"/> <b>No:</b> <input type="checkbox"/>
<p><b>Comments:</b> The very welcome inclusion in Annex 4 of the intention that the Non-Native Species Secretariat will establish and facilitate links overseas will need sufficient time and resources to be allocated to achieve success. The high level of international activity, the large number of organisations involved and the numerous non-native species problems in the UK Overseas Territories and Crown Dependencies will require substantial travel as well as numerous face to face contacts to engage GB effectively. The current staffing and resources available to the Non-Native Species Secretariat will need to be enhanced significantly to deliver the extra work in the international area.</p>	

## GB Invasive Non-Native Species Framework Strategy – Consultation Response Form – 4

<b>5.) STRATEGIC APPROACH</b>	
<b>18) Do you, or does your organisation, support this overall approach in Chapter 5? If not, what cost-effective alternatives do you suggest?</b>	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
<p><b>Comments:</b> The three-stage hierarchical approach is a sound and well-tested way of responding to the problems of non-native species. It also has the benefits of being understood and adopted internationally and there is no competing approach currently available for GB to deploy. The JNCC is committed to supporting the implementation of the Strategy through participating in the Non-native Species Programme Board and by delivering on its responsibilities in this area. There will be the need to ensure that sufficient resources are available to all the government organisations involved, as well as appropriate mechanisms for other stakeholders to join in partnerships to implement the Strategy. These mechanisms will include the Codes of Conduct, financial and technical support and where necessary legal mechanisms to ensure that strong prevention and management measures are in place where needed.</p>	
<b>19) Given that resources always have limits, do you have suggestions or ideas for maximising the benefits to be gained from this approach?</b>	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
<p><b>Comments:</b> Integration with other relevant initiatives is important, such as the UK Biodiversity Action Plan (UKBAP) within the biodiversity conservation sector, the Healthy and Biologically Diverse Seas Evidence Group (HBDSEG) for the marine environment, and with initiatives concerned with diseases (see JNCC responses to Questions 2, 8, 12 &amp; 56). Such integration will increase effectiveness and lead to more efficient use of resources.</p>	
<b>20) Do you have any other comments on Chapter 5 – Strategic Approach?</b>	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
<p><b>Comments:</b> A stronger profile for non-governmental groups and industry within this chapter would be welcome, otherwise the impression is given that this is a government strategy rather than a strategy for everyone concerned with non-native species issues. Implementation is greatly dependent upon the contributions of many organisations and individuals, ranging from their attitudes and intellectual contributions through to changing work practices, making different commercial decisions and carrying out practical and remedial work. Apart from the nod to the Convention on Biological Diversity on the three-stage hierarchical approach, there is no mention of the Strategy as part of international efforts to deal with these issues. It would be helpful to include a brief reference to initiatives addressing non-native species at European (e.g. as part of the Bern Convention and the EU Biodiversity Communication) and global (e.g. the Global Invasive Species Programme) scales.</p>	

<b>6.) PREVENTION</b>	
<b>21) Do you agree with paragraphs 6.4 &amp; 6.5?</b>	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
<p><b>Comments:</b> Yes, the principles of the approach set out concerning preventing introductions of species beyond their native range in GB, while at the same time not impeding natural range extensions, are sound. However, in practice there will be significant difficulties in differentiating human-assisted introductions from natural range extensions, particularly within the marine environment. It is very difficult, if not impossible, to distinguish between natural and anthropogenic spread of a species in the marine environment, unless there is a clear vector and even then the evidence is unlikely to be definitive. However, there is certainly value in attempting to control the extreme examples of range extensions (e.g. south coast of England to Scotland scenarios), but resources would have to be allocated only when there is clear evidence that a distinction can be made between natural and human-assisted spread.</p>	
<b>22) Do you:</b>	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
<b>a) Support the Chapter 6 (Prevention) objective?</b>	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
<b>b) Support the Chapter 6 (Prevention) underpinning actions?</b>	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
<p><b>Comments:</b> Yes, the objective is clear and achievable within the context of the Strategy. However, there are issues with</p>	

<p>the underpinning actions that require careful consideration. While the basis of the approach in the first three actions is sound (although risk assessment will inevitably not be a perfect tool), the implementation of the various action plans and their implementation via codes of conduct and legislation appears unduly complex and will be hard to communicate with the priority audiences. Identifying and then concentrating upon the most crucial prevention tasks, and securing the support of commercial and non-governmental partners in selling the “do” and “do not” messages to those best placed to prevent problems, will be a good approach to adopt.</p>	
<p><b>23) Do you have suggestions or ideas for maximising the benefits to be gained from these actions?</b></p>	<p>Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/></p>
<p><b>Comments:</b> The horizon scanning function needs to be embedded in the work of the Non-native Species Programme Board and its supporting working groups in order to put in place a more proactive and forward-looking approach to tackling the problems. The RAP will have a major role in horizon scanning at the species and pathways levels, but it is essential that there is the capacity to deliver horizon scanning without impairing the detailed risk assessments and that the other working groups embed horizon scanning within their schedules.</p>	
<p><b>24) How can you or your organisation help through your specific functions, roles or responsibilities?</b></p>	
<p><b>Comments:</b> The JNCC will represent the statutory conservation agencies on the Non-native Species Programme Board and will make available its specialist knowledge and advisory experience for working groups and specific initiatives as appropriate. Preventing damage to biodiversity in GB, UK (including Overseas Territories and Crown Dependencies) and internationally from non-native species is the top priority for the JNCC. The JNCC also recognises that there are other important interests regarding non-native species in addition to biodiversity conservation, and the JNCC is keen to continue to work with other stakeholders in finding acceptable and practical solutions to the major problems. The JNCC works extensively within the field of international biodiversity conservation conventions and agreements and these international links (which include a growing emphasis on the UK Overseas Territories) can be used to help improve coordination, collaboration and information exchange with others. The JNCC will continue to advise on UK international commitments (from conventions and agreements) to tackle non-native species problems. The JNCC is a strong supporter of the National Biodiversity Network as a mechanism for sharing biodiversity data, as well as seeking to make available derived biodiversity information to support policy development and decision-taking in the environment sector.</p>	
<p><b>25) Do you have any other comments or suggestions for inclusion in Chapter 6 – Prevention?</b></p>	<p>Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/></p>
<p><b>Comments:</b> Para 6.2, line 1: refers to “preventative measures...include[ing] risk assessment/analysis techniques”. Risk assessment or risk analyses are not preventative measures – they are tools that help to identify where opportunities for prevention may exist.</p> <p>Para 6.2, line 9: care should be taken when using terminology. Ships’ ballast water exchange is not a vector, ballast water is the vector. Ballast water exchange is the management tool which reduces the likelihood of marine non-native species being translocated.</p> <p>Para 6.7: concerning WTO rules, it should be stated that proportionate measures to prevent the arrival and establishment of non-native species (here or abroad) will prevent avoidable damage to trade and economic interests. It is not only biodiversity that suffers from the effects of damaging non-native species, but many businesses and livelihoods as well.</p>	

**GB Invasive Non-Native Species Framework Strategy – Consultation Response Form - 5**

**7.) EARLY DETECTION, SURVEILLANCE, MONITORING AND RAPID RESPONSE**

**26) Do you agree with the general principle expressed in paragraph 7.6?** Yes:  No:

**Comments:** The CBD precautionary approach is appropriate for guiding action in this area. However, it should be borne in mind that the RA process is not infallible and that some actions may need to be taken against species that were not signalled as likely to cause problems, but after establishment have resulted in damage to ecological, social or economic interests.

**27) Do you:** a) Support the Chapter 7 objective? Yes:  No:

b) Support the Chapter 7 underpinning actions? Yes:  No:

**Comments:** The overall approach described is satisfactory. There is the need to ensure that rapid, evidence-based decision-taking is in place to respond to potentially damaging species arriving in GB; this is hinted at in the last bullet (“...protocol for rapid approval of emergency action”), but it needs to be clear who will take these decisions in future.

The surveillance that is established at the next stage of implementation needs to be regularly assessed for its coverage, accuracy (including taxonomic reliability), and speed of collation and sharing of data and derived information for the terrestrial, freshwater and marine environments. Building the system steadily and ensuring its continuity over time will be essential for putting in place a robust and reliable tool that will be supported and used by all the organisations and individuals involved. There will need to be a mix of different schemes for different taxonomic groups as well as for different pathways and sectors.

Wherever possible, it will be best to build on existing tried and trusted schemes, although these may need to be supplemented by new arrangements in a few cases. In each case, the size of investment in the surveillance scheme should reflect the potential of non-native species within the group(s) to cause damage that can be prevented by an appropriate response. For high cost schemes, it will be essential to ensure a high level of integration with existing and planned surveillance programmes.

Central data collation and rapid data access are essential to support rapid and effective decision-taking in future, as well as to give a shared overview for all carrying out operational activities (thereby promoting consistency of response to both newly-arrived and established problem species).

A global view of taxonomic issues is important because in many cases the expertise on a non-native species arriving in GB will be elsewhere in the world, hence excellent communication using established taxonomic networks is required in order to access the necessary expertise quickly. Preparing a list of UK and international contact points for the major taxonomic groups for future use will be a worthwhile investment (and this should be shared with other countries regularly); this will complement the list of specialists working on non-native species being compiled by the DAISIE project. While funding of the underlying taxonomic research, preparing publications and maintaining collections should come from elsewhere, it may be necessary to have some resources available to commission specific investigations to identify previously unreported non-native species in GB and to assess their invasive potential via the RA process.

**28) Do you have suggestions or ideas for maximising the benefits to be gained from these actions?** Yes:  No:

**Comments:** Regular reporting via the non-native species website will help sustain interest and support for these measures, as well as alerting observers to newly-arrived species of concern. In addition, annual or two-yearly reports with analyses and interpretation of the results from surveillance should be considered with the aim of detecting significant trends (for individual species, groups of species, different ecosystems, major pathways and different geographical regions) and highlighting key events. A shared overview of what is happening across all the ecosystems, different taxonomic groups and major pathways is an important contribution towards better decision-taking at both the strategic and operational levels.

A further important opportunity exists to strengthen marine non-native species monitoring with impending monitoring

requirements under the Water Framework Directive (WFD). Invasive non-native species are already being considered by a specialist work group (Alien Species Group), as they relate to the Directive, under the management of the WFD TAG (Technical Advisory Group).

**29) How can you or your organisation help through your specific functions, roles or responsibilities?**

**Comments:** JNCC works in partnership with other organisations, notably the British Trust for Ornithology (BTO), the Biological Records Centre (BRC) and with the marine HBDSEG initiative (see JNCC response to Question 19) to maintain surveillance for UK biodiversity and the factors that affect biodiversity over time. The JNCC surveillance programme, based upon extensive volunteer-based recording of UK biodiversity, organised by scientists in the partner organisations, will be an important contribution towards investigating the impacts of non-native species on biodiversity in GB in future.

One of JNCC's main functions is to “establish common standards throughout the UK for nature conservation, including monitoring, research and the analysis of results”. In relation to this section, JNCC supports the country agencies in undertaking site condition monitoring, which can be used for non-native species surveillance where non-native species are recorded on SSSIs and Natura 2000 sites. Additionally, JNCC already co-ordinates information on many marine non-native species initiatives as one of the UK representatives at the related ICES group (WGITMO). JNCC similarly co-ordinates ballast water issues in the UK as they relate to biodiversity conservation, directing this information through the UK Ballast Water Working Group and through the ICES WGBWOSV. Updated information is reported when available on the JNCC dedicated marine non-native species website. Furthermore, as part of the statutory remit for UK biodiversity conservation, JNCC has compiled UK-wide data for marine non-native species and continue to work with the country agencies in commensurate efforts to ensure joined-up approaches where necessary. It would be sensible to build on these existing JNCC projects where relationships and processes are established, rather than develop new initiatives.

JNCC and the country agencies provide advice regarding marine monitoring via agreed co-ordination mechanisms (HBDSEG: see JNCC response to Question 19). Again, it would be prudent to ensure that HBDSEG is included within the non-native species Strategy to create synergy between these initiatives.

<b>30) Do you have any other comments on, or suggestions for inclusion in Chapter 7?</b>	Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>
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**Comments:** While action at a local scale to deal with non-native species threats is to be encouraged and supported (para 7.7 refers), this will only work if the necessary finances, staffing and expertise are available locally to respond to the problem. A means of supporting the relevant organisations locally is essential if this devolved way of working is to be effective (the examples of the Cornwall Knotweed Forum and the Tweed Invasive Project within the Tweed Forum are excellent models of what can be achieved with well-prepared local groups in the operational management sphere: see JNCC response to Question 35).

Reference to working with international networks and organisations (in addition to EPPO mentioned at bullet 1) would be beneficial both to GB and to other countries within Europe and beyond.

**8.) MITIGATION, CONTROL AND ERADICATION**

<b>31) Do you agree with the general principle expressed in paragraph 8.3?</b>	Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>
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**Comments:** JNCC supports the principle expressed in 8.3 as a sensible and proportionate response to the problems caused by non-native species. JNCC agrees that where a non-native species is having or is likely to have an impact, control and eradication should be instigated. However, the criterion of “where it is shown beyond reasonable doubt...” is far too stringent a standard to apply to invasive species biology, particularly at the beginning of establishment. In many invasive scenarios, such evidence would only be available once the non-native species is well established and consequently opportunities for eradication and control are likely to be significantly reduced. Additionally, this burden of proof would not permit the precautionary approach to be fully embraced. It would be more realistic to say “where there is evidence to suggest...”.

<b>32) Do you:</b> a) Support the Chapter 8 objective?	Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>
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<b>b) Support the Chapter 8 underpinning actions?</b>	<b>Yes:</b> <input checked="" type="checkbox"/>	<b>No:</b> <input type="checkbox"/>
<p><b>Comments:</b> In relation to the Objective          Whilst JNCC supports the objective, it should also include well co-ordinated action, not just cost-effective action; e.g. it is imperative that management and control plans in Ireland are consistent with those adopted in GB and vice versa. Not only will this save resources, but also ensure that costs in one country are not compromised by a conflicting approach taken elsewhere.</p> <p>In relation to Key Actions          The points made on the need for clarity of purpose (see JNCC response to Question 22) also apply here. The number of plans and groups involved looks overly complex.</p> <p>It is unclear how priority impacted habitats will be identified through the RA process. Whilst it is recognised that the RA assesses species and pathways, those habitats that are at risk from non-native species are not fully assessed by the current RA because of design limitations. It is also dubious whether the RA is designed to consider the feasibility of eradication. There is the danger of giving too much emphasis to the RA as an all-encompassing tool. Consideration should be given to involving leading non-native species and invasion biology specialists via the other working groups on such issues as the feasibility and desirability of proposed eradication programmes.</p> <p>There is ambiguity in the key action referring to management plans and ISAPs. The difference and/or overlap between them is unclear – for example, does an ISAP created for prevention qualify as being suitable for the management of that species? It would be useful if the Strategy clarified the differences or, combined the plans together if there are sufficient synergies to avoid confusion and minimise documentation. The simplest possible approach, involving the fewest plans and steps in the process, is likely to be most successful</p>		
<b>33) Do you have suggestions or ideas for maximising the benefits to be gained from these actions?</b>	<b>Yes:</b> <input checked="" type="checkbox"/>	<b>No:</b> <input type="checkbox"/>
<p><b>Comments:</b> Actions referring to priorities at different scales and GB level action programmes need to be progressed in conjunction in order to take full account of each other. It is imperative that the GB action programmes are aware of regional/local priorities, both internally within GB and cross-border with neighbouring countries (in particular Ireland). There needs to be a mechanism for resolving any differences of view between countries in GB (or between regions) on actions to be taken.</p> <p>There is now considerable international experience with eradicating predators from islands, and GB now has increasing knowledge from projects tackling mammalian predators on the Hebrides (CSL, SNH, RSPB). The potential to share this experience with the UK Overseas Territories (which include many islands with vulnerable endemic species represented within their biodiversity) should be borne in mind for future development of the Strategy within the UK OTs (see also JNCC responses to Questions 3, 13, 17 &amp; 24).</p>		
<b>34) How can you or your organisation help through your specific functions, roles or responsibilities?</b>		
<p><b>Comments:</b> The JNCC is not responsible for operational matters in relation to biodiversity conservation, this is the role of the country conservation agencies. The JNCC principal role will be through supporting these actions via provision of information and advice.</p> <p>JNCC has experience of non-native species policy and ecology, as well as awareness of non-native species initiatives, and will continue to assist the co-ordinating mechanism to achieve its objectives by hosting relevant information on JNCC webpages and maintaining expertise in-house to advise the Non-native Species Programme Board and relevant working groups.</p>		
<b>35) Do you have any other comments on, or suggestions for inclusion in Chapter 8?</b>	<b>Yes:</b> <input checked="" type="checkbox"/>	<b>No:</b> <input type="checkbox"/>
<p><b>Comments:</b> A specific mention of the local partnerships approach to dealing with management of non-native species would be worthwhile here. The Tweed Catchment Forum is an excellent model of what can be achieved with a well-prepared local group, in this case dealing with invasive river margin plants over an extensive area in a very efficient and cost-effective manner).</p>		

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<b>9.) BUILDING AWARENESS AND UNDERSTANDING</b>	
<b>36) Do you:</b> <b>a) Support the Chapter 9 objective?</b>	<b>Yes:</b> <input checked="" type="checkbox"/> <b>No:</b> <input type="checkbox"/>
<b>b) Support the Chapter 9 underpinning actions?</b>	<b>Yes:</b> <input checked="" type="checkbox"/> <b>No:</b> <input type="checkbox"/>
<p><b>Comments:</b> JNCC strongly supports the overall objective but considers that it should also incorporate a specific reference to government departments. It is recognised that intra-governmental awareness of related guidance and initiatives is a current weakness, but this can be overcome given good communications and persistence!</p> <p>The underpinning actions are good providing that care is taken in presenting the messages in the most appropriate way for each audience. There is a risk of complexity overwhelming the key messages; for example, reference is made to CoPs for key pathways and species, whereas the CoPs should be at a higher level than that to be effective. The relationships between the ISAPs, PAPs and CoPs needs to be thought through carefully, otherwise those involved with a single problem species might end up working with four or more plans and codes! There is much that can be learned from other countries that are more advanced in their communications on non-native species (for example, New Zealand).</p>	
<b>37) Do you have suggestions or ideas for maximising the benefits to be gained from these actions?</b>	<b>Yes:</b> <input checked="" type="checkbox"/> <b>No:</b> <input type="checkbox"/>
<p><b>Comments:</b> When identifying key audiences and priorities for raising awareness, it would be useful to undertake a gap analysis as a first step. Given that there is currently much happening, but it is not necessarily co-ordinated, a gap analysis would highlight those areas lacking communications, as well as those already being dealt with. This would have the added advantage of identifying where lessons have already been learned that may be applied in future to other communications.</p> <p>The working group responsible for communications would need to be regularly appraised of new initiatives at many levels (local/regional/national/GB/European and global) in order to produce appropriate publicity materials and to market them accordingly. The WG could benefit if a mechanism for disseminating information on initiatives was established.</p> <p>The Strategy could benefit from using the existing publicity material that has been most successful as best practice to guide future activities.</p>	
<b>38) How can you or your organisation help through your specific functions, roles or responsibilities?</b>	
<p><b>Comments:</b> The JNCC targets its publicity and advisory material towards selected audiences within the areas of policy development and decision-taking in the environmental sphere. The JNCC is best placed to comment upon work in this area and to support the messages regarding non-native species directed towards government departments and agencies, and to a lesser extent towards others working on environmental issues.</p>	
<b>39) Do you have any other comments on, or suggestions for inclusion in Chapter 9?</b>	<b>Yes:</b> <input checked="" type="checkbox"/> <b>No:</b> <input type="checkbox"/>
<p><b>Comments:</b> It is likely that a long term approach will be needed to raise the level of awareness regarding non-native species among the general public and specific priority audiences. While short campaigns may be required for specific issues, to achieve a high level of awareness and positive responses to biosecurity issues among the general public will probably need a succession of initiatives spanning several years to achieve success.</p>	

<b>10.) LEGISLATIVE FRAMEWORK</b>	
<b>40) Do you:</b> <b>a) Support the Chapter 10 objective?</b>	<b>Yes:</b> <input checked="" type="checkbox"/> <b>No:</b> <input type="checkbox"/>

<b>b) Support the Chapter 10 underpinning actions?</b>	Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>
<p><b>Comments:</b> The JNCC supports the objective of improving legislation to meet the aspirations within the objective, although putting in place the legislation is not sufficient by itself without the means of enforcement to ensure a good level of compliance. Again this is where the adoption of integrated approaches within the wider sphere of biosecurity (as discussed in the JNCC response to Question 12) is highly desirable.</p> <p>Overall, effective legislation will be beneficial to the three tier hierarchical approach that is the basis of the Strategy, but it should be borne in mind that legislation is a rather inflexible mechanism and there will be limited resources available for its enforcement. The use of legislation to support codes that can be updated quickly to meet changing circumstances is likely to be the best available solution to deal with non-native species. Codes underpinned by legislation (whereby non-compliance will result in legal liability for the consequences) and endorsed by the key stakeholders are a powerful means of encouraging compliance.</p> <p>The actions supporting the objective are generally sound, although the emphasis in the first bullet (and its two supporting bullets) upon urgent issues gives the impression that a considered review leading to a comprehensive improvement of the legislation is far into the future. While improved legislation by itself will not solve even urgent issues without good implementation and enforcement, more rapid progress towards better legislation overall will make an important contribution to achieving a purposeful and proportionate response to the problems of non-native species, particularly in the crucial area of prevention.</p> <p>A gap analysis should be undertaken of unregulated activities that are currently pathways for potentially damaging non-native species. Those pathways that are conduits for significant numbers of non-native species should be subject to more stringent controls to reduce the risk of non-native species entering GB. For example, cleaning of ships' hulls whilst in situ (in water) is not currently subject to any controls. This is believed to be a significant pathway for the entry of marine non-native species to GB, yet there is currently no legal mechanism to ensure safe practices are adopted via a consistent preventative regime.</p>		
<b>41) Do you have suggestions or ideas for maximising the benefits to be gained from these actions?</b>	Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>
<p><b>Comments:</b> The legislation needs to be explained in clear terms for the general public and for specific priority sectors; therefore the simpler and more direct the content of the legislation, the more likely it is to be understood and complied with. There needs to be a close relationship between the legislation, the use of supporting codes and the key messages used for building awareness and understanding. This consistent approach should be embedded within the actions for developing the legislative framework and these related objectives.</p> <p>To deliver the key actions of this objective, the Strategy needs to account for legislation that can affect or be affected by non-native species issues, even if the legislation itself does not explicitly mention non-native species. For example, the impending Anti-Fouling Systems (AFS) Convention is likely to result in an increase in non-native species arrivals via hull fouling, given that replacement anti-fouling paints are not currently as effective as the TBT paints that are being banned. Benefits can be gained by ensuring that the ways such legislation is transposed (and the guidance provided) is consistent with tackling non-native species issues within the Strategy.</p>		
<b>42) How can you or your organisation help through your specific functions, roles or responsibilities?</b>		
<p><b>Comments:</b> As statutory advisers to the government on nature conservation issues in the UK, the JNCC has experience of legislation in relation to biodiversity conservation in GB, UK and internationally; this experience will be made available to assist those developing and drafting new legislation (both within the UK and internationally) in order to avoid conflicts with biodiversity legislation and policies. JNCC, working in conjunction with the country agencies, will seek to ensure that legislative solutions for non-native species are practical and can be implemented in cost-effective ways that build support among the different sectors involved.</p>		
<b>43) Do you have any other comments on, or suggestions for inclusion in Chapter 10?</b>	Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>
<p><b>Comments:</b> The legislative framework for non-native species in GB is increasingly set by legislation within the European Union and by international obligations established by conventions and agreements. The last two main bullets of chapter 10 refer to GB participating with the European level of legislative development and interactions between member states, which the JNCC supports as the best course of action to ensure that European legislation meets the needs of GB and will assist with preventing and responding to threats from potentially damaging non-native species. In addition, GB should continue to participate within the most influential global fora to share experience and expertise in</p>		



the quest to develop better international responses to dealing with problem non-native species. Many of these international fora deal with marine non-native species issues (with ballast water and hull fouling being two major areas of concern). GB (within the UK) should continue to contribute actively to these groups for the same reasons stated for European legislation above.

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<b>11.) RESEARCH</b>	
<b>44) Do you:</b>	
<b>a) Support the Chapter 11 objective?</b>	<b>Yes:</b> <input checked="" type="checkbox"/> <b>No:</b> <input type="checkbox"/>
<b>b) Support the Chapter 11 underpinning actions?</b>	<b>Yes:</b> <input checked="" type="checkbox"/> <b>No:</b> <input type="checkbox"/>
<b>Comments:</b> The JNCC supports the objective and has contributed to previous efforts to identify ways of delivering improved research to underpin responses to non-native species in Britain (e.g. to the report by the UK Biodiversity Research Advisory Group (BRAG)). There are some important considerations regarding the steps necessary for improving the utility of research being commissioned in GB with respect to its future direction and outputs. The number and diversity of funding sources for research on non-native species in GB has led to a somewhat fragmented approach to selecting topics for investigation and a degree of opportunistic submissions by scientists for funding. The lack of a coherent research programme on non-native species themes, supported either by research council(s) or environment departments, has contributed to the lack of a research Strategy in this area. While the major research requirements have been identified (e.g. within the UK BRAG report), there is as yet no properly considered route to funding these in priority order (with the priorities set from the perspective of those seeking to prevent future arrivals of damaging non-native species in GB and to tackle the existing problems on the basis of the best available knowledge).	
<b>45) Do you have suggestions or ideas for maximising the benefits to be gained from these actions?</b>	
	<b>Yes:</b> <input checked="" type="checkbox"/> <b>No:</b> <input type="checkbox"/>
<b>Comments:</b> Attention should be given to ensuring that research and data gathering activities in GB are linked to appropriate European and global projects to avoid duplication of effort and ensure that data are shared effectively (whether these data originate from research or risk assessments).	
The DAISIE project, coordinated by CEH, is a welcome European level project that will do much to bring together key data and supporting information within a database on non-native species in Europe, and is also compiling a register of specialists in the field of non-native species. The future development of this project, and how it links to the national audits compiled by CEH for SNH and English Nature (now Natural England), requires careful consideration. Completing an audit for Wales (in conjunction with regular future updating of the audits for Scotland and England) is a priority, as well as bringing the audit of UK marine non-native species up to date (previously compiled by JNCC).	
<b>46) How can you or your organisation help through your specific functions, roles or responsibilities?</b>	
<b>Comments:</b> The JNCC does not currently conduct research on non-native species, although JNCC has recently commissioned a review of non-native species in UK Overseas Territories. One of JNCC's special functions is to "provide advice and disseminate knowledge on nature conservation issues affecting the UK and internationally". JNCC has relevant knowledge and expertise that can be used to support work on prevention, management and policy development for non-native species. JNCC has contributed to the Expert Group 5 project within the SEBI2010 programme coordinated by the European Environment Agency and is exploring the development of economic assessments of the impacts of non-native species. In addition, as part of JNCC's representation at the relevant ICES meetings, specialists gather information and data on reports of marine non-native species throughout the year. JNCC will build on these areas and continue to work closely with colleagues in the country agencies to deliver consistent approaches to dealing with non-native species from the perspective of our respective responsibilities for biodiversity conservation.	
<b>47) Do you have any other comments on, or suggestions for inclusion in Chapter 11?</b>	
	<b>Yes:</b> <input checked="" type="checkbox"/> <b>No:</b> <input type="checkbox"/>
<b>Comments:</b> The JNCC believes that the existing review work (including notably the BRAG report and the GB Policy Review) should be used as the basis for further development of the programme of research to support work on non-native species in GB. In many cases it is better application of existing knowledge that it required, rather than starting new research. There is much research conducted elsewhere in Europe and globally that it relevant to GB, but probably little time for most people to access and understand the findings so that they can be applied here. There need to be strong links developed and maintained between the work of the RAP and sources of research findings to ensure that risks are assessed on the basis of the best available evidence.	

Marine projects on non-native species are reported through the ICES BWOSV and WGITMO groups. JNCC is one of the UK representatives for these groups and can provide additional information when required.

As previously mentioned (see JNCC response to Question 19), HBDSEG is co-ordinating both existing and impending marine monitoring commitments. However, it also has a remit for engaging the research community. Hence, future research coordination for non-native species needs to take full account of HBDSEG.

The Global Biodiversity Sub-Committee of the Global Environmental Change Committee is currently identifying priorities for UK research on international non-native species issues. It will be important to maintain close links with research on non-native species in GB.

<b>12.) INFORMATION EXCHANGE AND INTEGRATION</b>	
<b>48) Do you:</b>	<b>a) Support the Chapter 12 objective?</b>
	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
	<b>b) Support the Chapter 12 underpinning actions?</b>
	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
<b>Comments:</b> The JNCC considers that the objective is appropriate and well-expressed and should support the exploitation of research (see JNCC response to previous Question) and use of other information better in future.	
Information exchange is crucial to ensuring the success of the Strategy. JNCC concurs with the key actions as being appropriate and believes that they will underpin the objective successfully. The main players within and outside GB have been identified for information exchange, and this is a good structure to adhere to for planning the lines of communication. At the next stage it will be good to prepare an implementation plan to make explicit provision for putting in place the range of links for sharing information and establishing systems to integrate different sources and make information available.	
<b>49) Do you have suggestions or ideas for maximising the benefits to be gained from these actions?</b>	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
<b>Comments:</b> The NNS website will play a valuable role in pointing to the different sources of information and in summarising the news of key developments. The existing working groups and the Stakeholder Forum also have much potential for improving information exchange (although there needs to be stronger representation of industry and NGOs within these groups). Consideration should be given to the ways in which formal working links and informal events and activities can be combined to improve the exchange and use of information on non-native species in GB and externally.	
<b>50) How can you or your organisation help through your specific functions, roles or responsibilities?</b>	
<b>Comments:</b> JNCC will continue to make available information on non-native species as appropriate via the JNCC website and other media. JNCC will continue to work with partner organisations to encourage and facilitate access to data and information on non-native species via the NBN. In conjunction with its other work on conserving biodiversity in the UK Overseas Territories JNCC will assist with practical steps to improve information exchange as a means of supporting those working on non-native species in these areas.	
<b>51) Do you have any other comments on, or suggestions for inclusion in Chapter 12?</b>	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
<b>Comments:</b> There are some good models internationally for sharing information in the area of non-native species. The use of E-mail groups (as with the Aliens List established under IUCN auspices), websites (as with GISP) and workshops and training courses led by government agencies and NGOs all show what can be achieved, and GB should seek to learn from each of these and adopt good solutions that will work here.	

## GB Invasive Non-Native Species Framework Strategy – Consultation Response Form - 8

<b>13.) IMPLEMENTATION REVIEW</b>	
<b>52) Do you have any comments on Chapter 13?</b>	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
<p><b>Comments:</b> JNCC agrees with the key actions and suggests that realistic targets need to be associated with each action in order to press progression of the Strategy. While it is recognised that it is difficult to set targets associated with maintaining links and “keeping up to date”, drafting something akin to an ‘Implementation Plan’ of when groups will meet and how they will communicate would be a good start. The plan could also include steps describing how GB mechanisms will coordinate information and knowledge sharing. It would be sensible to include quantifiable targets in any implementation plan, to chart the progress of more tangible tasks.</p>	

<b>CONCLUDING QUESTIONS</b>	
<b>53) Looking back over this strategy, do you feel that the Vision statement in the Introduction clearly encapsulates the overall approach set out?</b>	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
<p><b>Comments:</b> The Vision states the overall direction well in terms of making a difference (“better protected against...”) but falls short of a direct commitment to taking more effective actions to deliver the desired state as summarised in the three bullets. A stronger expression of intent for GB to “raise its game” in this area would be a welcome sign of determination to make a difference from where we are now.</p>	
<b>54) a) As an overall strategic framework, do you feel that this strategy is balanced in terms of the proposed work areas?</b>	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
<b>b) Could it be improved, if so, how?</b>	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
<p><b>Comments:</b> The balance in terms of increasing the emphasis upon prevention is good, but at the ecosystem level there needs to be more attention devoted to the freshwater and marine environments. In both freshwater and marine situations there are significant impacts of non-native species upon GB biodiversity and in both cases there is the need to increase the level of activity and improve prevention measures in future. Use of the working group mechanism is one way in which the different organisations involved and relevant expertise can be deployed more effectively in future. Working groups reporting to the Non-native Species Programme Board will need to be representative of the key stakeholders as well as have sufficient technical expertise to cope with the wide range of non-native species issues in freshwater and marine environments.</p> <p>As well as raising the attention given to freshwater and marine non-native species issues via the working group mechanism, there is the need to increase the resources available to prevent new introductions and to deal with existing problems more effectively in these ecosystems. The balance of effort across the different taxonomic groups, different ecosystems and different geographical areas should be reviewed regularly by the Non-native Species Programme Board.</p> <p>There will also need to be the time and capacity within the Non-native Species Programme Board to take on the priority issues emerging from all the working groups and to find the resources necessary to support their activities and make progress sufficiently quickly to build up support and momentum for the Strategy.</p>	
<b>55) Do you have any views on the relative balance of priorities across the areas covered in this framework strategy?</b>	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
<p><b>Comments:</b> There needs to be a shift in the near future to increase the emphasis upon effective prevention measures in order to reduce the number of new arrivals of non-native species, thereby in turn reducing their impacts upon native biodiversity and reducing the costs of eradication and control measures. Such a shift will only be effective if there is improved communications and collaboration with other countries that we are linked with by transport and trade, as well as improved international sharing of information on damaging species and proven techniques for preventing their movement and establishment.</p>	

<b>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?</b>	<b>Yes:</b> <input checked="" type="checkbox"/> <b>No:</b> <input type="checkbox"/>
<p><b>Comments:</b> The relationship between this Strategy and the measures taken to deal with human and animal diseases needs careful consideration. There are substantial common interests in developing improved prevention measures for both non-native species and diseases, combined with the need to disseminate messages on biosecurity to travellers, importers and the general public.</p> <p>Better integration of effort is required between the different organisations responsible for dealing with non-native species in Britain: this should be within the framework of a national Strategy for biosecurity issues encompassing non-native species (as defined for this consultation) together with the disease organisms mentioned in the preceding paragraph.</p> <p>Improved funding to tackle problems associated with damaging non-native species is urgently required, particularly for prevention, rapid eradication responses and management control measures for agreed priority species.</p>	
<b>57) Do you have any comments on the RIA document?</b>	<b>Yes:</b> <input checked="" type="checkbox"/> <b>No:</b> <input type="checkbox"/>
<p><b>Comments:</b> The RIA is clear, accurate and appropriate for the Framework Strategy. Two specific points are noted here.</p> <p>In para 2.12 it is not made clear that the Plant Health and State Veterinary Service deal with the disease aspects that are not covered by the draft Framework Strategy; the relationship of the Strategy to diseases (they are not included) should be made explicit.</p> <p>In para 6.13 it was not public reaction in Italy that opposed Grey Squirrel eradication, but a minority pressure group.</p>	

**Thank you for completing this questionnaire. Please email your saved questionnaire to [nnss@csl.gov.uk](mailto:nnss@csl.gov.uk)**