



ORNAMENTAL AQUATIC TRADE ASSOCIATION LTD.

"The Voice of the Ornamental Fish Industry"

1st Floor Office Suite, Wessex House

40 Station Road, Westbury, Wiltshire

United Kingdom BA13 3JN

T: +44 (0)1373 301353 F: +44 (0)1373 301236

info@ornamentalfish.org www.ornamentalfish.org

Dear Lord Gardiner

SECOND AMENDMENT TO THE EU LIST OF INVASIVE ALIEN SPECIES

My organisation represents the ornamental aquatic trade in the UK, including fish and plant importers, breeders and growers, wholesalers, distributors, manufacturers and retailers. The UK ornamental aquatic industry is estimated to contribute in excess of £400m a year to the economy and employs around 12,000 people.

As an industry we are acutely aware of the need to ensure that our industry does not create a biosecurity risk to the UK and have worked closely with officials in your department over many years to spread the important message that potentially invasive species should not be released into the wild. We were far ahead of the game in implementing a voluntary ban on five plant species a decade before the Government introduced regulatory controls, an action which most likely mitigated a far worse invasive impact. Furthermore, many of our members promote 'no release' and 'Be Plant Wise' messaging on their aquarium and pond products. We estimate that at least several hundred own brand products (including fish transportation bags, plant labels and ancillary products) sold through our members contain such messages. Hundreds of thousands of such products are sold each year and in combination with further messaging on till receipts, websites and online presence reach in excess of a conservative estimate of 8.5 million members of the public per year who purchase pets, not to forget that the message is continually reinforced to returning customers.

We are aware that you will soon be asked to take a decision on the latest proposals for species to be added to the EU List of Invasive Alien Species of Union Concern. I would like to take this opportunity to outline our concerns about the proposals to list a further three aquatic plants coming so soon after the ban of the popular pond plant, the Water Hyacinth (*Eichhornia crassipes*). We estimate that the ban on the sale of this species alone has cost the UK aquatic plant sector £1M a year, despite it presenting no biosecurity risk to the UK. UK plant growers have suffered significantly because of the bans on sale and we estimate they have seen a fall in their floating plant sales of an estimated 25 %. This does not take account of the consequential impacts on reliant businesses in, for example, packaging and transport. These impacts will be exacerbated further if the listing of the three additional plant species are adopted – one of which, the Water Lettuce (*Pistia stratiotes*), was recommended by your Department as a suitable alternative to the Water Hyacinth.

Of greater concern however is the potential that this continued reduction in the range of aquatic plant species available for sale could actually increase the risks to UK biosecurity. Should the current proposals for aquatic plants species be adopted, we are aware that businesses will seek alternative opportunities to recover the financial losses they incur, by looking at the potential to trade in other, un-assessed species which may present a potentially higher invasive risk in the UK, an outcome none of us wish to see.

What we are already observing is aquatic plants normally recommended only for use in home aquariums – i.e. in contained holdings, with minimal risk of release into the wild - being advertised as pond plants to counter the impact of the financial losses experienced. There is a very real risk that some of these aquarium plant species may have the capacity to adapt to colder climes and become invasive and may carry potentially dangerous pests.

Anecdotally we have also been told that in sourcing alternative plant species, lesser known species are being sourced to such an extent that they are impacting on the sustainability of wild populations. Wild sourcing of plants also poses a greater plant health risk than cultivation in controlled environments. Even if this is not currently occurring, we believe it is an important consideration.

It is our view that unless Member States stand against the European Commission's pressure to adopt long, all-inclusive lists of species (many of which are of limited concern across the majority of the EU) we will be driving businesses that would normally support and deliver positive biosecurity measures to disengage from this important activity and to import, cultivate and sell species that may represent a greater risk to UK biosecurity.

We would therefore urge you to oppose the current proposed list of species and in doing so to encourage the European Commission to take a more considered and proportionate approach to future listing proposals under the EU Invasive Alien Species Regulations, including voting on individual species rather than on long lists for the sake of expediency or on political grounds.

We would welcome a meeting involving a selection of our members to discuss this matter further.

I am writing in similar terms to the Secretary of State.

Yours sincerely



Dominic Whitmee
Chief Executive, OATA