



ORNAMENTAL AQUATIC TRADE ASSOCIATION LTD
"The voice of the ornamental fish industry"

Wessex House, 40 Station Road, Westbury Wiltshire
BA13 3JN, UK

Telephone: +44(0)7946 167121

Email: info@ornamentalfish.org

www.ornamentalfish.org

On behalf of:

Ornamental Aquatic Trade Association (OATA)

Sustainable Users Network (SUN)

Reptile and Exotic Pet Trade Association (REPTA)

Dear Baroness Hayman

Cc:

Mary Creagh CBE MP

Rt Hon Rachel Reeves MP

Lord Livermore

Sir Chris Bryant MP

Lord Stockwood

Rt Hon Nick Thomas-Symonds MP

We are concerned that DEFRA's **repeated delays** in implementing decisions on invasive species are causing avoidable financial losses for UK businesses and undermining confidence in the legislative process. This is in direct contradiction to the Government's growth agenda¹ and promises of support for Small and Medium Enterprises (SME's)². Effective national biosecurity relies on meaningful collaboration with stakeholders, with prolonged delays **eroding trust** and **discouraging compliance**.

The pond plant, water hyacinth (*Eichhornia crassipes*) – along with six other plant and three animal species - have been **marked for delisting as an invasive species since March 2023** with the GB Non-Native Species Secretariat (GBNNS) noting "*their inability to establish in GB under the foreseeable climate conditions*"³. There are at least 3.7 million garden ponds in the

¹ [Written statements - Written questions, answers and statements - UK Parliament](#)

² [Backing your business: our plan for small and medium sized businesses](#)

³ [Update on the Aquatic Biosecurity Partnership](#)

UK – representing around 13% of all households⁴. Since the proposed de-listing, British businesses have **lost over £3.5 million** in trade from this species alone (Annex 1), with no associated biosecurity benefits.

Scientifically reviewed revisions to invasives legislation have been promised since the UK's departure from the European Union, yet **no substantive progress** has been made. More broadly, EU rules do not reflect GB's ecological realities – differences in climate, available habitats, photoperiod and rainfall can significantly influence a species' ability to survive, reproduce and spread within GB. For more information, please see Annex 2.

These ongoing delays run contrary to the Government's wider commitments on regulatory reform and economic growth. In the Government's 2025 Spring Statement⁵, it was stated "*growth is the central mission of the government.*" with the Spring Tax Update⁶ setting out a series of measures focussed on "*Reducing burdens on business to support economic growth*". Implementing the already agreed de-listings would deliver an easy regulatory win and immediately restore trade for many GB businesses.

OATA and its member businesses demonstrate a strong and collective commitment to preventing the spread of non-native invasive species, through a comprehensive range of targeted measures. Further details can be found in Annex 3.

To prevent further delays and restore confidence in the legislative process, we would ask for a firm ministerial commitment to implement the de-listings in 2026. Thank you for your time and consideration on this very important matter.

Yours sincerely,

Dr Matthew Bond
OATA Chief Executive



The Ornamental Aquatic Trade Association (OATA) represents more than 800 UK businesses which provide fish-keepers with everything they need to set up and maintain a successful home aquarium or manufacturers and plant growers, many of which are SMEs. Analysis has found that the UK ornamental aquatic trade is worth over £1bn annually, of which £660m is generated from retail sales.

⁴ [Paw-some new pet population data released by UK Pet Food | UK Pet Food](#)

⁵ [Spring Statement 2025](#)

⁶ [Spring Tax Update](#)

Annex 1

An Overview of the loss of wholesale and retail trade in water hyacinth since the 2016 ban

Before the 2016 ban on trading water hyacinth, OATA surveyed retailers and wholesalers to assess the likely financial impact (please see annex 2 below). Wholesalers reported supplying more than 225,000 plants annually, with a retail value of over £565k at the time. When adjusted for 2025 inflation, the absence of water hyacinth the UK market, equates to a loss of nearly £800,000 in retail trade each year⁷. Since the water hyacinth was marked for de-listing in March 2023, wholesalers and retailers have lost out on at **least £3.68 million of trade** – under the assumption that any implementation would be delayed until late summer 2026 – which would result in another year with no trade.

We informed member businesses in March 2023⁸ that the water hyacinth would soon be returning to GB ponds; the continued failure to implement the de-listing almost three years later is indefensible and damaging. Implementing the delisting would not only restore this trade but also represent an “easy-win” in line with both the Governments growth agenda⁹ and wider policy goals to reduce “burdensome legacy regulations”¹⁰ as mentioned in the OECD’s 2025 Regulatory Policy Outlook.

Year	Status	Wholesale (WS) loss	Retail loss	Inflation multiplier		
2014	legal	£108,500	£565,777	0		
2017	banned	£112,189	£585,013	1.034		
2018	banned	£114,902	£599,158	1.059		
2019	banned	£116,963	£609,908	1.078		
2020	banned	£117,940	£615,000	1.087	WS loss while banned	Retail loss while banned
2021	banned	£121,086	£631,407	1.116		
2022	banned	£132,045	£688,551	1.217	£715,124	£3,729,036
2023	marked	£143,437	£747,957	1.322	WS loss while marked for de-listing	Retail loss while marked for de-listing
2024	marked	£145,282	£757,575	1.339		
2025	marked	£151,358	£789,259	1.395		
2026	marked	£151,358	£789,259	1.395	£591,434	£3,084,050
					Grand total of WS loss since 2017 ban	Grand total of retail loss since
					£1,306,557	£6,813,087

⁷ [Inflation calculator | Bank of England](#)

⁸ [Water hyacinth set to return to GB ponds - OATA - The Ornamental Aquatic Trade Association](#)

⁹ [Spring Tax Update](#)

¹⁰ [Strengthening regulatory quality for people, the planet and prosperity: OECD Regulatory Policy Outlook 2025 | OECD](#)

Data obtained from OATA member business survey conducted 2014-2014, with 10 responses from wholesalers and 73 from retailers.

Annex 2

Background information on water hyacinth

The findings of the comprehensive review regarding likelihood of establishment of Water Hyacinth (*Eichhornia crassipes*) under 2050 climate scenarios are welcome and in line with our historic position on this species. We believe that 2050 is the most appropriate scenario to consider when listing or de-listing a species from the regulation due to the greater accuracy of climate modelling vs the 2100 scenario. In addition, there is nothing to prevent further assessments being made in the future as confidence around future UK climate grows.

That said we believe that there is a need for consideration of other key variables beyond climate metrics when considering likelihood of establishment of *Eichhornia crassipes* or indeed any other plant species that are considered for listing.

There is no practical evidence within the UK trade that this species will either flower in summer or over winter unless protection has been provided - thus neither sexual nor vegetative reproduction will permit unprotected populations to persist in the UK. We believe that this is not only due to the inclement climatic conditions in the UK but also the photoperiod and level of solar irradiance present. When considering the invasive potential of plant species we believe light levels a logical parameter to assess which does not appear to be considered in the review documents circulated.

Water hyacinth is reported to be a heliophilous species, with fastest growth at 240,000 lux and a minimum requirement of 24,000 (Téllez *et al.*, 2008). In comparison, the minimum required light level is only barely reached in the UK in June for an averaged total of 167 hours, and even the months of May and August are below the minimum requirement of 24,000 lux cited in the literature¹¹.

The light saturation point for this species has been reported to be in the range of 1500 to 2000 $\mu\text{mol}/\text{m}^2/\text{s}$ ⁽³⁾, meaning that below these levels, light becomes limiting. Again, these levels are

¹¹ Solar radiation data (1983 – 2005) from NASA's Atmospheric Science Data Center for coordinates corresponding to the UK Met Office's Camborne station (50.21782°N, -5.32656) as the southernmost solar radiation monitoring station in mainland UK, were used for comparison. Sunshine hours data corresponds to UK Met Office long term averages.

not reached in the UK and over the months of December and January, light levels are within the plants' compensation range¹² of 30 – 70 $\mu\text{mol}/\text{m}^2/\text{s}$ ⁽⁷⁾.

This is supported by practical observations from plant growers and pond owners who report that even after the sunniest and warmest summers, water hyacinth still inevitably dies over the winter. Plant growers also report great difficulty in overwintering these plants, even in greenhouse conditions (see figure 1 below). Greenhouses must be heated to around 15°C, at which temperature the plants won't grow, but will remain alive. Growers also note that even in heated greenhouses they do not observed flowering except for those individuals that are imported with flowers intact which will inevitably wilt once exposed to UK conditions.

Given these reasons, we believe it is premature to suggest that water hyacinth poses a significant risk of establishment in the UK even under 2100 scenarios. Whilst welcoming the findings based on 2050 scenarios and would recommend that this is the scenario that decisions to list or de-list are made upon, we suggest that any future assessments of *E.crassipes* or indeed any other non-native plant species include assessments of available light levels in the United Kingdom.



Annex 3

Biosecurity actions taken by OATA



The Ornamental Aquatic Trade Association (OATA) represents more than 800 UK businesses which provide fish-keepers with everything they need to set up and maintain a successful home aquarium or manufacturers and plant growers, many of which are SMEs. Analysis has found that the UK ornamental aquatic trade is worth over £1bn annually, of which £660m is generated from retail sales.

OATA and its member businesses demonstrate a strong and collective commitment to preventing the spread of non-native invasive species, through a comprehensive range of targeted measures. The organisation's [Biosecurity and the Ornamental Aquatic Industry](#) guidelines and [Business Biosecurity Self-Assessment tool](#) provide clear, evidence-based best practices to support member businesses in mitigating the risks associated with disease and invasive species.

OATA actively supports the [Be Plant Wise](#) campaign, in partnership with the GB Non-Native Species Secretariat, informing industry stakeholders to emerging risks- such as Zebra Mussels (*Dreissena polymorpha*) being identified on imported [moss balls](#), whilst promoting low-risk alternatives such as [British produced mussels and snails](#). OATA also contributes evidence to Government committees and works alongside European partners to ensure legislation remains proportionate and science led. Additionally, the organisation embeds prominent “**No release**” messaging across its range of publicly available, veterinary endorsed, [care sheets](#) and members [Code of Conduct](#) continually to encourage manufacturers to incorporate this style of messaging on product packaging to help prevent risks associated with invasive species.