



Management measures for widely spread Invasive Alien Species (IAS) in England and Wales September 2019

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The Ornamental Aquatic Trade Association (OATA) represents more than 850 UK businesses which provide fish-keepers with everything they need to set up and maintain a successful home aquarium or garden pond, including retailers, breeders, importers and manufacturers, many of which are SMEs. We promote high welfare standards in the industry through a wide variety of initiatives, such as our Code of Conduct, customer care sheets and our Primary Authority scheme for pet shops.

We recognise that virtually every species in which we trade in is not native to the UK. So our industry has a responsibility to both educate customers about the need not to release fish or plants into the wild and ensure high standards of biosecurity when moving animals and plants around the world. We provide the industry with information on this, from our [Biosecurity Code](#) to our [Pet Code of Practice](#) for keepers and traders (in partnership with the Reptile & Exotic Pet Trade Association). We are keen supporters of the Be Plant Wise initiative and Invasive Species Week and highlight the 'no release' message on all our customer care sheets. Many of our members also include the 'no release' message on their own brand products which has the potential to reach 8.5 million consumers a year.

Size of the industry in the UK

- 4 million households own fish (that's 14% of the population).
- There are 100+million fish kept in aquariums and ponds (making fish the most populous pet).
- Fishkeepers spend £400 million a year on their hobby while pet owners in general spend around £6 billion a year on their pets (that's all pets) including foods, accessories and veterinary care.
- That generates taxes of more than £2 billion annually.
- 50,000 people are employed by the pet industry within the UK (we estimate around 12,000 are employed by aquatic-related businesses).
- Pets are good for our health and are estimated to save the NHS at least £2.45 billion every year (which could be a conservative estimate). Therefore the benefits of pet ownership in general, in terms of tax generated and NHS spending spared, is about £4.45 billion a year.

Question 6: What are your views on the proposed aims for the management measures set out in Appendix A?

We are broadly in support of the aims of the management measures. However it is disappointing that the enforcement measures have been postponed yet again. We reiterate that without effective

enforcement measures problems will persist endlessly as online sellers continue to sell banned plants with impunity, particularly as more species are added to the EU list each year.

Given that the 14 species outlined in the management measures cannot be imported, sold etc, it is surprising there is no central information portal which advises people on which species cannot be traded, what they look like and when the ban took effect. The 'natural' home for such a portal would be the GB NNSS website as that is where most people will navigate to. However, although there is a wealth of information on the website, the majority of it comprises risk assessments and ID sheets which are written by ecologists for ecologists and not so much for the lay person. It does not make clear what are banned species and what are not.

There is also no mention in this consultation about how it intends to deal with public perceptions around management measures. Any measures involving animals, particularly those perceived by the public as being 'cute, fluffy and cuddly' will likely invoke an emotive response, thus causing social conflict (as highlighted by Crowley *et al.* (2017)). In relation to plants, measures which involve the use of biological/chemical means may also give rise to social conflict by the public in their use. As recommended by Crowley *et al.* (2017), this consultation should give due regard to which areas of conflict may arise and how they can be addressed. For example, to engage the public as to why management measures are needed for these 14 species, a public education campaign could be done via e-learning. The GB NNSS offer free, comprehensive e-learning modules via their website and given their expertise in developing such modules, once such potential areas of social conflict have been identified, e-learning modules could be offered to the public via the GB NNSS e-learning portal on why such measures are required and how the public can help. This would assist in the public being made to feel more inclusive in decision making and enhance their understanding of why such measures are needed to ensure the long-term survival of GB native species and sensitive ecosystems.

We would also like to point out that efforts to manage or eradicate IAS in the UK have been hindered in part because of agencies missing the 'golden window of opportunity' to eradicate an IAS from a site, because no one body will take responsibility for such measures. The delay which ensues, whilst bodies enter discussions about who should take responsibility or decide whether to take action at a site because it may affect other species (an example highlighted during the recent EAC Inquiry by Dr David Aldridge was the gulf wedge clam¹), ultimately means that the opportunity to eradicate an IAS before its numbers spread is often missed. Of course OATA raised concerns in 2004 about several aquatic plant species (some of which are mentioned amongst the 14 species) but yet it took a decade until an official ban came into effect, a time span which could have resulted in these species being better managed.

We know that *Lagarosiphon major* (Curly waterweed) is still being sold illegally, often under the name of *Elodea crista* or that such species are being mis-sold under generic terms such as 'oxygenators' and is highly likely to be entering the UK illegally. Where OATA has received information on such sales/illegal entry, this has been reported to the relevant authority, but until such time as enforcement powers come into effect, the authorities do not have the power to intercept and seize such illegal consignments. More also needs to be done in relation to the e-commerce supply chain which is increasingly a pathway of introduction for such illegal species. Whilst illegal and illicit activity continues, this is wholly undermining the efforts of the legal and legitimate industry in promoting the Be Plant Wise campaign and educating its customer base to raise awareness of the negative impacts that IAS cause and what measures they can undertake to stop their spread, which is increasingly leading the legal and legitimate industry to feel disengaged

¹ <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/environmental-audit-committee/invasive-species/oral/103087.html>

with such campaigns, as their reputation is being greatly harmed, both reputationally and financially, by those who engage with impunity in illegal and illicit activity.

Question 7: What are your views on the general management measures set out in Appendix B?

We note that the management measures for plant species includes the 'encouragement' of 'private horticulturalists, retailers, land owners and public gardens' to promote native species and safely remove and dispose of plants over time.

We would point out that native species are not necessarily the best solution. For example, with aquatic plants native species might not be readily available to buy in garden centres when 'pond season' gets going around March/April which is when people are looking to spruce up their ponds. They also don't always display well or have the 'shelf life' as non-native plants so people are reluctant to buy them, if they are even available when they want them. And of course what is native in one area of the UK may not be native to another. Native species might also be sourced from a different country of origin and therefore there is a risk of them carrying non-native hitchhikers or pathogens. Some native species, in contained holdings such as ponds, will grow very aggressively and quickly take over an area. This will lead to owners having to continually manage and clear out such plants, which runs the risk that some people may dispose of such plants (and therefore any associated hitchhikers) inappropriately. Again, public awareness campaigns and engaging the public are key to ensuring people consider the consequence of an action BEFORE they carry out that action. More also needs to be done to tackle those people who deliberately plant INNS species in the wild in the misguided belief that it will benefit the wild when in fact it is likely to cause significant harm.

We would also suggest that thought is given to the messaging around the removal and disposal of the plant species mentioned in this consultation, which may be in private gardens etc. This should be done via a gradual 'phase out' with the message continually being 'drip fed'. It is likely that the introduction of the Enforcement and Permitting Order on 1 December 2019 could cause panic in the general public unless there is very careful guidance, as to how they will prove they obtained a species, which was subsequently banned, BEFORE the ban came into effect. Measures should consider offering guidance to members of the public as to how they can responsibly dispose of such species from their ponds/aquariums should they wish to do so. Such measures should engage with industry expertise as to how this message can be disseminated and continually reinforced via industry's outreach to its customers.

The obvious way to do this would be through the Be Plant Wise campaign, of which OATA is long-time supporter. But the campaign badly needs an update. It is very hard to currently find, in one place, a definitive list of the plants that are banned from sale in the UK (you can find aquatic plants on the OATA website). The GB Non Native Species Secretariat website lists a whole host of plants as invasive but it is not clear from this whether these plants are illegal or not. To consumers who are not well versed in invasive species issues or jargon the website is not particularly helpful.

We understand the GBNNS is looking to revamp the BPW information and we look forward to playing our part in this (OATA has already provided suggestions on how to reframe the message). To ensure the effectiveness of the management measures in Appendix B a key element will be good quality, easy-to-find and easy-to-follow information with a clear 'call to action' message on how to safely get rid of plants taken out of the ground/pond. This way the well-intentioned gardeners will not inadvertently spread the plants further. For example, how many gardeners would know that plant material for plants such as Japanese Knotweed and Ragwort must not be disposed of via Local Authority kerbside green waste bins/council recycling centres but can only be disposed of as 'controlled waste'?

Question 8: Are there additional actions you think should be allowed as licensable management measure for a particularly widespread species?

In relation to Table 6 of the Consultation, it refers to licensable management measures such as permitting the controlled growing of the plants species mentioned as research on management methods. Our industry has members who hold a significant depth of knowledge on the conditions that such plants are likely to require for growth and as such they may be able to fill in any current knowledge gaps or suggest ways in which such knowledge gaps could be addressed given their international networks. If such measures were to initially take advantage of industry knowledge transfer, any such resulting licensable measures could be more effectively targeted to achieve the specific outcomes of management and eradication.

Our main concern is the advice to be given to terrapin owners. *Trachemys scripta* is the only species on the animal list that are pets, all the other animals covered by this consultation are wild animals. So the issues are very different for these animals because the 'audience' for these management measures are largely owners.

These are creatures that can live for 30 years so advice needs to be clear and simple and offer solutions to people who can no longer care for their pet. Where can they take these animals if they can no longer offer a home? If euthanasia is the only option then we believe the likelihood of releases will increase because realistically owners are unlikely to want to kill a much-loved pet.

We believe this species on the list needs a different approach to management, other than just eradication. We therefore welcome the acknowledgement that keeping terrapins in captivity could become a licensable activity (pg 7).

Under Table 7 of the Consultation, it mentions about animals being taking into captivity to prevent their release back into the environment. Hadlow College and the National Centre for Reptile Welfare (based at the college) developed a citizen science project called Turtle Tally which could provide invaluable information as to where known populations of sliders are in GB and also to raise awareness of where new sightings occur, allowing for effective intervention and eradication from any new sites.

We would urge the Government to work with both OATA and the Reptile and Exotic Pet Trade Association (REPTA) to investigate alternative methods that would allow these animals to be handed on to licensed rescue centres or keepers. REPTA has an interesting idea on how these could be looked after by volunteers who could create enclosed systems within their homes or gardens to house these animals during their lifetime. The NCRW could become a licensed facility which could vet potential rehoming who could offer secure, escape proof housing for sliders for the duration of their natural lives, with any such vetting procedures being approved by the Competent Authority and rehoming working 'under licence'. But we would urge that this is made possible under a general licence to encourage adoption licence paperwork for this to be as simple as possible.

This would also be a dual aspect approach as the NCRW would act in raising public awareness on IAS and act in preventing inappropriate releases to the wild if owners were to consider that release to the wild is 'kinder' than euthanising a healthy animal. The NCRW/REPTA approach would also likely generate favourable responses from the public in offering a viable and effective alternative to culling/euthanasia, whilst also offering an opportunity for research at a licensed facility.

We believe that the approach taken to this species is an important blueprint for the future as more and more species that are kept within domestic settings are listed (eg raccoon dogs). It is therefore vital that whatever management measures that are agreed here can be replicated easily for other species kept as companion animals in domestic settings or as part of private collections.

Question 10: What are your views on the proposed licensable management measures set out in Appendices C & D?

In relation to Appendix D, for the ornamental industry, the only permitted non-native crayfish species in England and Wales is the tropical species, the Red-clawed crayfish (*Cherax quandricarinatus*) for indoor aquaria only. In Scotland, no non-native crayfish species are permitted to be kept for aquarium purposes.

Whilst the measures proposed in relation to capture of the Signal crayfish for human consumption purposes is a pragmatic approach, it is somewhat concerning that the Consultation states that the use of Signal crayfish for human consumption has seen an industry build up around this, which in some part has perpetuated the problem. If management measures are to be achieved, the Government needs to work with this industry to ensure that all those within this supply chain are aware of their duty of care and their obligations in promoting the 'No Release' message.

Question 11: Are there any additional actions you think should be allowed as a licensable management measure for a particular widely spread species?

No, other than to state that increased public awareness campaigns are needed to avoid potential social conflict, given that the controlled capture and translocation of IAS to a secure, licensed facility is likely to be more favourable to the public, for animal species, than culling/euthanasia.

Reference

Crowley, S.L., Hinchcliffe, S. and R.A. McDonald. (2017). Conflict in invasive species management. *Frontiers in Ecology and the Environment*. 15(3), pp. 133-141.