



## **Stakeholder consultation on new GB NNESS Rapid Risk Assessments October 2019**

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Following consultation with OATA's Invasives Working Group, we are responding with our comments on the draft GB NNESS Rapid Risk Assessments that have been produced in relation to:

### ***Aponogeton distachyos* (Cape Pondweed)**

Known in the trade as Water Hawthorn, we would advise that overall, we consider this Rapid Risk Assessment to be a fair assessment of this species.

In terms of socio-economic costs to the ornamental aquatic plant industry, the Water Hawthorn is a very important species for the UK's ornamental aquatic industry and based on industry expertise, it is considered to rarely be a problem species as it does not thrive in every situation. If it is kept in closed environments i.e. ponds (particularly lined and concrete ponds), seedlings are easily controlled, as are any plants which occur outside planting baskets if they are subsequently disposed of responsibly. The leaves of Water Hawthorn are readily eaten by snails and pest species, such as those which also affect waterlilies, with ducks known to sometimes root out and eat bulbs if these plants are grown in shallower water.

In its native range of South Africa, Water Hawthorn will die back during the dry of summer and re-invigorates after the rains. Kept in ornamental ponds in the UK, it has adapted to grow best during the spring and autumn. When kept in shallow ponds (which get very warm), it will often be observed to die back completely during the summer but will revive later in the year or the following spring. Die back during the summer months may lead to owners assuming that the plant has died if they are unaware that the plant is likely to revive later on. When kept in deeper, cooler ponds (ponds of a depth of approx. 60-70 cm), Water Hawthorn can grow and flower right through the growing season until the first frosts, although it may still go through a lull stage during the height of summer.

We would anticipate that if climate change results in hotter summers in the UK, this might actually serve to make Water Hawthorn less popular as a pond plant, as its summer dieback will occur sooner. In the event of milder winters, it is possible that Water Hawthorn may survive in more northerly sites.

## ***Orontium aquaticum* (Golden Club)**

In terms of the UK's ornamental aquatic plant trade, compared to other aquatic plant species, this species is sold in fewer numbers and as noted in the RRA, by a limited number of specialist suppliers. This is due to factors such as that it is a very slow growing plant and will therefore take a number of years before it is ready to be sold and that if sold as mature plants, they will be more expensive. Those that are sold are mostly by water garden specialist mail order firms. It is generally considered by industry not to be an invasive species due to it being a non-rampant grower and is grown within private dwelling ponds, botanic gardens and at sites such as the RHS Wisley garden. Although it can spread via seedlings, it would appear that only a few seedlings would survive to grow into mature plants.

In terms of its history in trade as an ornamental plant species, the earliest reference we have is that it was first introduced in the UK in 1775 (Sanders, 1947) and has most likely been sold across Europe since the early 1900s. The species appeared in the Lagrange French Catalogue of 1912 and was known to be being sold by Perry's of Enfield by 1935. Therefore, it would appear that this species has been used for ornamental purposes in the UK for 244 years and is known to have been in commercial trade in the UK for over 80 years.

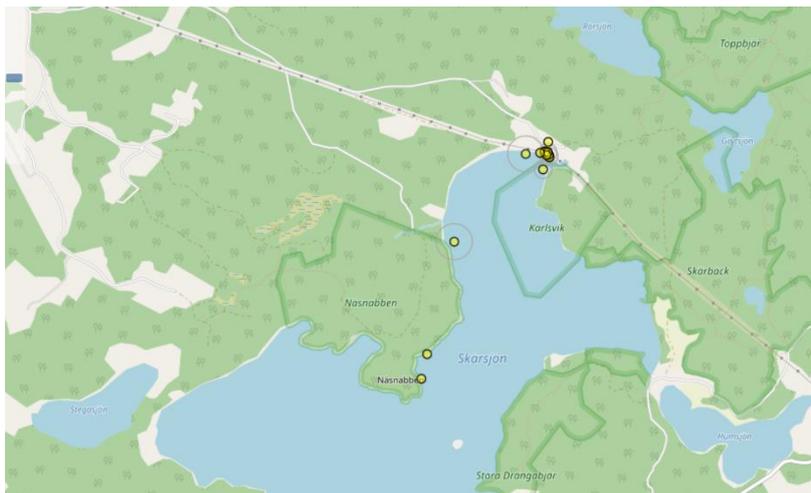
In relation to the RRA, we make a number of comments as below:

### *EU Chapeau – Question 3*

It is noted that in reply, it is said to be invasive in only one Member State i.e. (currently) the UK.

### *Section A – Organism Information - Question 6*

In relation to the global distribution of this species and its occurrence as an established alien in Sweden. We have been in contact with our colleague trade association in Sweden, Zoobranschens Riksförbund (ZooRF) for further information and they have subsequently enquired with their Competent Authority. The information we have is that this species (known as Guldkolv in Sweden), according to Sweden's Portal of Species i.e. Artportalen, occurs only in one single lake, Skärsjön in Western Sweden.



**Figure 1: Screenshot from Sweden's Artportalen on the occurrence of Golden club in Sweden** (OATA personal communication to ZooRF, 2 October 2019).

According to Sweden's Artportalen, the last update on its occurrence at this lake was dated August 2019. It is our understanding that in Sweden, this species is classed as lowest risk, however, its effects are

currently not known (OATA personal communication to ZooRF, 2 October 2019).

### *Section A – Organism Information – Question 7*

#### Occurrence in Llyn Syfydrin, Cardiganshire, West Wales

We would consider that due to the fact that this species has been found growing next to *Pontaderia cordata* (a non-native, very popular pond plant), this would suggest that its introduction to this site has been as a result of deliberate planting, rather than the inappropriate disposal of ornamental plant material.

#### Occurrence in the New Forest

Noting the comment later on in this RRA that monitoring of the pond at this site was not undertaken, it would be helpful to know if there is any available information on this site. For example, any information which may be able to explain how the spread of this species was enabled such as conditions in the pond itself or with regards to the management of this pond such as whether this site had conditions which may have favoured spread via seedlings.

### *Section A – Question 8*

In relation to its occurrence in Sweden, please refer to our earlier comment above in relation to question 6 and its known occurrence at a single lake in Skärsjön, Western Sweden. We would suggest that it may be prudent to access Sweden's Artportalen given the most recent update on this species' occurrence is dated August 2019.

### *Section B – Detailed Assessment – Question 1.21*

Our industry experts advise that in relation to reports of some resistance of Golden Club to herbicide treatment, this species has dark green leaves with a sheen, this would mean that water droplets would run off, as would those herbicides, such as the glyphosate which is licensed for use on aquatics. For such herbicides to work properly, an adjuvant would be required that would make the herbicide 'stick'.

### *Section B – Question 1.22*

The response that this species has great capacity to spread appears to be somewhat contradictory to the response to Question 2.9 which accurately reflects the slow growing nature of this species.

### **Reference**

Sanders, T.W. (1947). Sanders Encyclopaedia of Gardening. *W.H. and L. Collingridge, London, UK.*