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**Impact of Invasive Alien Species in Wales**  
**NFU Cymru's written report to National Assembly for Wales' Environment and**  
**Sustainability Committee**

## Introduction

NFU Cymru supports the introduction of a strategic approach to managing non-native invasive species within Great Britain and Europe. The management of land colonized by invasive species can be difficult and expensive for farmers, therefore preventing establishment of species known to be a threat must be taken forward within a coordinated framework. We therefore welcome this call for evidence as evidence that the National Assembly views this as a matter of some concern.

However, restrictions on the introduction of species must not prevent farmers and growers from being able to react to markets and to grow new varieties of crops as and when they become commercially available. We do not want controls that prevent the use of IAS for plant breeding. Invasive species may have an important trait that can benefit agriculture through its inclusion in plant breeding.

Better scrutiny of the behaviour introduced species in Welsh conditions is required. As an example not all Rhododendron species are invasive.

A much stronger stance and penalties on illegal imports of both plants and animals into the UK is required through more rigorous checks at ports and airports.

Another issue that is of major concern for us, is who will cover the cost for improved monitoring, early eradication etc. As points of principle any non-native invasive species strategy framework must not impose administrative or financial burdens on farmers and growers or prevent them from developing their agricultural and horticultural businesses in the future. This would be our concern about the proposed introduction of a Directive from the Commission. We have a mechanism in place under current regulation, what is required is earlier action to introduce these and no new Directive is required to do this.

Finally, we question how such a policy for containing and restricting the spread of Invasive non-native Species (INNS) will dovetail with policies to allow climate change adaptation and species movement through increased connectivity within the landscape. Fencing off rivers for example may reduce diffuse pollution in the first instance but increases the risk of Japanese Knotweed or Himalayan Balsam incursion which when it dies back in winter exposure banks to significant soil erosion problems.

We will now look more specifically at the views sought by the Committee

## Current Information

1. The context on overall costs of controlling IAS, are extremely well covered in a November 2010 publication on the Economic cost of Invasive non-native species on Great Britain. <https://secure.fera.defra.gov.uk/nonnativespecies/downloadDocument.cfm>?At the time of the report the independent authors estimated the total annual costs of INNS of £125,118,000 to Wales. Furthermore this points to evidence those INNS are becoming more widespread and the economic impact is expected to increase and demonstrate clear benefits to early intervention.

2. An important point is that the report looks at over 500 non- native species and it is our belief that the Committees enquiry should not be too focussed. Obviously Japanese Knotweed and Himalayan Balsam are examples of plants currently at the forefront of the mind but equally rabbits, mink, rats, varroa mite and Canadian Geese would be of more concern to some individual land owners and occupiers. What we need is a system in Wales that allows flexibility to act quickly to individual situations as they arise. This is illustrated in the Agricultural and Horticulture section of the report which estimates annual costs of non- native species in Wales at a massive £71million.

3. NFU Cymru is concerned about incorrect disposal or release of species and its effects on agricultural production. For example poor composting and spreading of that compost on agricultural land could result in inadvertent seed or cutting spread. Rhododendron is a classic example of a poisonous non- native species made worse this year on snow covered fields when stock had no access to other vegetation. Control often comes at a cost to the landowner and in fact GAEC Cross Compliance requires the occupier of land to take reasonable steps to prevent the spread of rhododendron giant hogweed, Japanese knotweed and Himalayan balsam and this is also a requirement in agri environment schemes. This needs to sit within the overall control strategy for any species and not as a stand- alone otherwise it has to be continually repeated.

4. There is [an Invasive Non Native Species Framework Strategy for GB](https://secure.fera.defra.gov.uk/nonnativespecies/home/index.cfm). This was published in 2008. This seems quite a balanced logical document with many of the actions in place <https://secure.fera.defra.gov.uk/nonnativespecies/home/index.cfm> and contains a host other useful info. The strategy document sets out is a high level framework providing a context for national, regional and local initiatives. It contains details of 49 specific key actions which are grouped under a number of key objectives, namely;

1. Prevention
2. Early detection, surveillance, monitoring and rapid response
3. Mitigation, control and eradication
4. Building awareness and understanding
5. Legislative framework
6. Research
7. Information exchange and integration

Currently, out of the 27 Member States, GB is one of only eight MS with a national strategy in place putting us amongst the first in Europe.

5. However in a Welsh context we believe the Welsh Government's strategy needs to concentrate on points 1 and 2. Never have the words a 'stitch in time' been more relevant than in this case. Not only would delay be costly but it would also come up against legislative issues, choice of control would be limited and indeed public perception on the acceptance of control methods. Another saying becomes relevant 'hit it early, hit it hard'

6. Once a species is established control strategies need to be coordinated. The setting up of Natural Resources Wales will help with this through a catchment based approach for example but the funding needs to be in place if it is to have any chance of success.

7. NFU Cymru's understanding from Brussels colleagues of what the new legislation will look like is as follows:

1. Current IAS will be formally identified and managed...Member States will be given **flexibility** to choose management measures
2. A key list of IAS will be prioritised through risk-based analysis
3. New measures will focus on prevention of IAS entering the EU. Lessons will come from NZ, Australia, US and Canada
4. The regulation will build on existing systems at national and EU level e.g. border checks currently used for plants and animals will be stepped up
5. The regulation will be flexible and will be introduced on a step-by-step basis
6. The regulation will come in conjunction and be coherent with the new plant and animal health regimes, due any minute.
7. No net loss of biodiversity.

8. Point 6 in particular we think is important. Whilst we fully support the strengthening of plant and animal health regimes we would question the need to have a Directive concentrating solely specifically on invasive species particularly if it will impose financial burdens on landowners and occupiers who had no control of the introduction of that species to their land in the first place. Moreover agri environment scheme payments in future may depend on achieving specifically set targets, targets which would be put at risk by invasive species.

## Conclusion

Invasive Alien Species are not new, but at a time when we need to produce more from less, reduce costs and protect biodiversity their timely control and prevention is more important than ever. Prevention is always better than cure and we look to Welsh Government to have a strategy in place that not only deals with current problems holistically but to have a mechanism that prevents them from establishing in the first place.