

### Belfast City Council Response to An Invasive Alien Species Strategy for Northern Ireland

#### Introduction

Belfast City Council welcomes the opportunity to comment on an Invasive Species Strategy for Northern Ireland (Draft Strategy). Protection of biodiversity is in line with the Belfast Local Biodiversity Action Plan and a key theme within our Corporate Plan – *Better Care for Belfast's Environment* and as such we are pleased to see the development of an Invasive Species Strategy for Northern Ireland.

The EU biodiversity strategy to 2020 acknowledges that biodiversity loss is the most critical global environmental threat alongside climate change – and the two are inextricably linked. Consequently the EU has committed to a new vision and target for biodiversity “to halt the loss of biodiversity and ecosystem services in the EU by 2020 and restore them insofar as possible, while stepping up the EU contribution to averting global biodiversity loss”.

In Northern Ireland we have set targets to significantly reduce biodiversity loss by 2010 and to halt the loss of biodiversity by 2016.

Biodiversity provides numerous ecosystem services such as water purification, carbon storage and flood protection. For example pollination by bees and other insects provide services boosting agricultural production worth at least £94 billion annually. Many of these services are under threat.

Invasive Alien Species are widely acknowledged as the second biggest threat to biodiversity loss worldwide. This threat is likely to increase in the future unless robust action is taken at all levels to control the introduction and establishment of these species and address those already introduced. The impacts of IAS are far reaching from disrupting ecosystem services to threatening economic interests.

#### Summary Comments

- There is a significant policy and legislative gap in terms of IAS and Belfast City Council welcomes this Strategy as a key step to address this complex issue. The Strategy will aid co-ordination of action across government departments and stakeholders which is essential to deliver the objectives.
- Given the costs associated with taking action once species are established, there is clear justification in investing in prevention and Belfast City Council welcomes the development of a policy framework with an emphasis on prevention. However, a more proactive response is required to include restoration to habitats and species affected by IAS.
- There is a need to develop a sound legislative framework to address the issue of IAS. The current legislation is inadequate to deal with these complex and wide ranging issues. Although the EU Biodiversity Strategy proposes a dedicated EU legislative instrument to tackle IAS it will take a number of years to transpose an EU Directive. National legislation is a fundamental requirement to tackle IAS. Without this we will accrue future costs and indeed many species will become established and too costly to address.
- The Strategy needs to be sufficiently resourced. Investment now will buffer against future costs.

## Strategy Questions

Q1 - Belfast City Council supports the principle of a broad partnership approach given the complex nature of IAS and agrees that this issue requires the participation of a wide range of stakeholders to be effective. Both the prevention and control of IAS will require commitment across government both central and local, industry and the private sectors.

Q2 – Belfast City Council supports the scope of the strategy and welcomes the emphasis on the precautionary approach and prevention. Although we support this approach and the alignment with the guiding principles of the CBD, the European Strategy on IAS (2003) states that it is important to go further than this defensive approach and that policies need to include restoration measures for species, habitats and ecosystems that have been affected by IAS

The Council is concerned with the Statement that additional resources are unlikely to be available. There is clear justification for investment in preventing species invasions and rapid response once discovered. The area of IAS is currently under resourced and delays will incur additional future costs for Northern Ireland.

Q3 – The Council welcomes the emphasis on preventing new species entering and becoming established in NI. Currently there is no comprehensive legislative instrument to deal with IAS and BCC considers that this will be required in order to achieve this objective. IAS legislation should not only be limited to the sale of high risk species.

Q4 – Belfast City Council supports the development of an early warning and rapid response system which is critical to deal with IAS. Legislation which gives authority to implement a rapid response is required.

Q5 – Belfast City Council support the objective to develop an effective mechanism for monitoring, reporting and recording invasive alien species to inform the response to threats posed by new and established invasive alien species.

Q6 – BCC supports the development of Invasive Species Action Plans but there must be associated resources made available to undertake action. The development of criteria on which decisions are made should be included within the Implementation Plan.

Q7 – The Council supports this objective and in particular the need to develop an online toolkit of methods to tackle IAS. This toolkit should be comprehensive, practical and species specific. It should cover the legislation and the impacts of IAS.

Practitioners should be involved in the development of the toolkit.

Q8 – Belfast City Council supports the objective to maximise organisational effectiveness and collaboration on invasive alien species issues. We particularly welcome the action “to formalise a co-ordination mechanism for joined up working across Government which identifies lead agencies, contact points and clear roles and responsibilities of stakeholders”. This action is key to dealing effectively with IAS in terms of rapid response, control or monitoring. Management of IAS requires cross sectoral and government commitment. We also welcome the commitment to deliver training for Local Authorities in conjunction with Biodiversity Officers and to provide a co-ordinating and information resource on IAS.

Q9 – We support the objective “to raise awareness of invasive alien species amongst the general public and raise awareness of capacity for action amongst key stakeholders to increase their understanding of the risks that invasive alien species can pose to our native wildlife, economy, environment, society and the actions that minimise these risks”. BCC welcomes that this objective includes the economic and social implications of IAS which the Council considers critical to both engender ownership of these issues both within government and amongst the general public. The

Council has already held training sessions on IAS for staff, NGOs and stakeholders but there is an ongoing need. Local Biodiversity Action Plans can provide an effective vehicle to develop Action 28.

Q10 – Belfast City Council strongly supports the need “To ensure that the legislative framework in Northern Ireland for addressing invasive alien species issues is coherent, comprehensive, fit for purpose and ‘proportionate’.

To achieve some of the key objectives within the Strategy a sound legislative framework is required. The Wildlife Order and the Wildlife and Natural Environment Bill are wholly inadequate to address IAS. In addition when undertaking action practitioners are faced with contravening other legislation such as the Water Order and the Waste Order.

This objective is critical to delivering any strategy on IAS. As outlined throughout the document there are shortfalls in terms of authority to undertake action, prevent the import and indeed the export of IAS to other countries and the means to address this is the development of primary legislation. The EU has outlined this gap in the EU biodiversity strategy and will develop a dedicated EU legislative instrument. While a Directive on IAS will occur within the short to medium term, the cost of IAS is such that we cannot afford to wait until such a Directive is transposed into National legislation. Scotland has recently introduced far reaching legislation on IAS Wildlife and Natural Environment (Scotland) Act 2011. Primary legislation is essential to ensure action can be undertaken on IAS. Without this we will accrue future costs and indeed many species will become established and be too costly to address.

Q11 – Belfast City Council supports the objective. Any management strategies and control programmes must be underpinned by sound science both to ensure effective use of limited resources but also to ensure public and political support.

Q12 – Belfast City Council would like to see the inclusion of the following actions within the Implementation Plan.

The development of primary national legislation to address pathways, early detection and response and containment and management of IAS.

The development of criteria on which decisions on whether to eradicate and/or control IAS are made.

The development of a funding strategy.

Education and awareness programme targeted at different interest groups and sectors.

Q13 – While we support the review cycle 5 years and even 3 years is a long timeframe in terms of IAS. There must be opportunity to ensure that there is flexibility within the process to deal with new species as and when they occur rather than waiting for a review. The implementation plan must have the flexibility to respond to new species as they arrive and amend priorities as situations develop.