

**Consultation on the Alien and Locally Absent Species in Aquaculture Regulations
(Northern Ireland) 2012**

Belfast City Council Response

Belfast City Council welcomes the introduction of the Alien and Locally Absent Species in Aquaculture Regulations (Northern Ireland) 2012. 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*.

Invasive Alien Species are widely acknowledged as the second biggest threat to biodiversity loss worldwide. This threat from IAS 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.

The aquaculture industry is a significant pathway for the spread of Invasive Alien Species including many which threaten this sector. Consequently we welcome these Regulations which will help protect the aquaculture industry and biodiversity.

Response to Consultation Questions

Consultation response 1: You are invited to note the scope of the Regulation and to comment on the Department's proposed policy in relation to Articles 2.5, 2.6 and 2.7.

Belfast City Council considers the scope of the Regulation to be comprehensive. We are concerned about Point 20 "*the requirement to notify the Department does not apply to subsequent movements or translocations of the same species that is originally notified to the Department by the same person to the same aquaculture facility*".

We consider the Department should retain the option to require further notifications should circumstances change such as the discovery of a new invasive species. The impact of movements on genetic diversity should also be evaluated.

Consultation response 2: Comments are sought on the proposal to have DARD designated as the competent authority for ensuring compliance with the requirements of the Regulation and the possibility of also having the Loughs Agency designated as the competent authority for the Foyle and Carlingford Areas.

Belfast City Council considers that the Department of Agriculture and Rural Development and the Loughs Agency are the most appropriate bodies to act as Competent Authorities for the purpose of these Regulations.

Consultation response 3: Comments are sought on (i) whether or not an advisory committee should be established and (ii) if so, who should be represented on such a committee?

The Council considers that an advisory Committee should be established. The Committee should include representation from universities, and other relevant experts for example representative from the Invasive Species Ireland Project. The Council agrees it should include representation from the relevant state agencies in the Republic of Ireland where applicable. In addition Representation from Great Britain would also be helpful in terms of horizon scanning and the prevention of further introductions of IAS.

Consultation response 4: Comments are sought on (i) the option of allowing the competent authority to decide whether an independent body should undertake environmental risk assessments and (ii) on who should bear the costs.

The Council agrees that the Competent Authority should decide whether the applicant or an independent body should undertake environmental risk assessments. The Council considers that the applicant should take full account of the risks posed by their proposals and bear the associated costs.

Consultation response 5: Comments are sought on whether or not applications and risk assessments for marine organisms should be referred to ICES prior to the issuing of an opinion by the advisory committee.

On the whole the advisory Committee may have the necessary expertise to make decisions on the tasks assigned in the Regulations. However, the Council considers it would be advisable to retain the option to have applications and risk assessments reviewed by ICES.

Consultation response 6: Comments are sought on the proposal that any costs associated with the development or implementation of a contingency plan should be borne by the person to whom the permit was granted.

The Council agrees that the associated costs with the development and implementation of a contingency plan should be borne by the permit holder.