



DEFRA Consultation on the Recommendations of the Working Group Report of the Review of Non-Native Species Policy

The Deer Initiative's response to Defra's Consultation

Introduction

The Deer Initiative (DI) is a wide partnership of statutory, non-statutory, voluntary and private interests. Whilst originally set up by the Forestry Commission and still, in the main, funded by the Forestry Commission, it has a core staff whose activities are both to co-ordinate the relevant activities of the partners and to deliver some functions directly.

The aim of the DI is *"to ensure the delivery of a sustainable, well managed wild deer population in England"*. The staff and finances of the DI are managed through the DI Ltd, a charitable company limited by guarantee, dedicated to supporting the DI. This response reflects the views of the staff of the DI, our partner organizations will respond separately.

In pursuance of the above aim we are particularly concerned with the impacts of the current alien wild deer species present in England and Wales and the potential threat of new invasive non-native species. The issue is therefore a priority for the DI and we are pleased to respond to this consultation.

Our comments on the Key recommendations are:

Key recommendation 1: The Government should designate or create a single lead co-ordinating organisation to undertake the role of co-ordinating and ensuring consistency of application of non-native species policies across Government.

Given the current and potential impact of invasive non-native wild deer species on biodiversity, economic interests and public health and the wide range of sectors involved we would support the concept of a lead co-ordinating organisation. Such a body, **with appropriate resources**, could monitor and ensure a consistent approach to non-native species both across Government and for industry and other stakeholders. It could monitor and initiate action on prevention of introduction, control and eradication of invasive species, could facilitate the exchange of good practice between stakeholders and may also steer initiatives to raise awareness. We believe that the individual agencies should also be able to initiate activity as they will be responsible for implementing actions.

The Consultative Forum on non-native species policy would seem to be the most appropriate way for sectoral bodies to interact and work with the co-ordinating organization.

As the policy is being addressed on a Great Britain basis and invasive non-native species pose such a major threat to nature conservation we would support the proposal that JNCC should take on the role of co-ordinating body. This is subject to the caveat that close involvement with land management organizations is maintained through the forum to ensure that commercial interests are given equal weighting.

Whichever organisation is appointed it is fundamental that it is properly resourced so that it can address this issue with the urgency and consistency it deserves.

Key recommendation 2: Develop comprehensive risk assessment procedures to assess the risks posed by non-native species and identifying and prioritizing areas for other prevention action.

We support this proposal and believe it will be a key part of a programme to prevent future introductions of invasive species. We agree that the risk assessment procedures should cover all non-native species to highlight generic pathways of introducing invasive species. We support the development of a list of high risk species we do not believe that preventative action should be solely restricted to those flora and fauna included on the list.

Key recommendation 3: Develop codes of conduct to help prevent introductions for all relevant sectors in a participative fashion involving all relevant stakeholders.

We fully agree with this recommendation and would wish to see it extended to wild deer. The recent Deer Commission for Scotland policy on sika deer provides a relevant model.

Key recommendation 4: Develop a targeted education and awareness strategy involving all relevant sectors.

We fully support a programme of targeted education and awareness. One of our highest priorities in England and Wales is to prevent the further inappropriate releases of wild deer, in particular muntjac. With both prevention of releases and early detection critical in the effective control of invasive species an effective education and awareness strategy is extremely important. Currently the only effective method of controlling wild deer is through culling and this can only occur with the acceptance of both landowners and the general public.

Key recommendation 5: Revise and update existing legislation to improve handling of invasive non-native species issues.

The current Defra consultation on wild deer in England (closing date 16 April) proposes some changes to the legislation but there are no major changes proposed for the handling of our current invasive non-native species (sika and muntjac). We are addressing these issues in our response, but it is imperative that any proposed changes to the legislation, in particular The Deer Act (1991) recognize the threat posed by current and potential non-native species.

Key recommendation 6: Establish adequate monitoring and surveillance arrangements for non-native species in Great Britain.

We believe that a list of the principal established non-native species should be prepared classifying them as either benign (eg fallow deer?), widespread and numerous (where local strategies can manage numbers and limit spread, eg muntjac deer?) and local (where eradication is practical, economic and desirable- eg sika deer in Wales?).

5.4 – We would agree that one organisation has overall responsibility for ensuring adequate monitoring and surveillance.

5.5 – We believe that this would be best co-ordinated through the overarching body.

5.6 – For some established but very damaging non-native species individual monitoring should be continued but for other taxa a better approach may be to monitor corridors which may also maximise the value of limited resources.

Key recommendation 7: Policies should be established with respect to management and control of invasive non-native species currently present or newly arrived in the wild, and operational capacity to be developed to implement these policies.

We note that in the Government response it is indicated that the top priority is for measures to avoid or minimize new and unwanted introductions. However we believe that equal priority should be given to control strategies for those species already present and established which are having negative impacts.

6.3 – We would agree with the priorities listed in the paper but would suggest that the longer term priorities are moved forward to become medium term priorities to reflect their importance and that fact that two of the three short term objectives are already largely in-hand.

6.5 – The DI believes it would be wrong to make a strategic pre-emptive choice between containment and control without regard to the nature of the species in question. The Bern Convention proposed a three-tier hierarchy of

measures, prevention, eradication and control, and we need to follow this lead more closely.

Key recommendation 8: Stakeholders should be fully consulted and engaged in development of invasive non-native species policies and action through a mechanism such as a consultative forum.

The DI was represented at the first meeting of the Consultative Forum held on February 11th in Bristol. This was a very useful introductory meeting with a great deal of experience and interests represented on the forum which should allow dynamic small sub-groups to be set-up to address different issues.

Given the importance of invasive non-native species and the concerns that global warming may change the current characteristics of established non-native species we would suggest that the forum should not have a limited life-time.

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12 March 2004