

GB Invasive Non-Native Species Framework Strategy – Consultation Response Form



Name: Peter Watson
Organisation: The Deer Initiative

Please indicate which category of organisation you represent: Conservation/NGO
Other category (Please specify):

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PUBLICATION OF RESULTS

Are you responding: a) As an individual (Please go to c)	Yes: <input type="checkbox"/>	No: <input type="checkbox"/>
b) On behalf of a group/organisation (Please go to e)	Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>

INDIVIDUALS

c) Do you agree to your response being made available to the public (in the relevant GB Administration library and website and/or on the non-native species secretariat website)? If Yes, please go to d. If your answer is No we will treat your response as confidential.	Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>
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d) Where confidentiality is not requested, we will make your response available to the public on the following basis (please tick one of the following boxes)

Yes, make my response, name and address all available.	<input checked="" type="checkbox"/>
Yes, make my response available, but not my name or address.	<input type="checkbox"/>
Yes, make my response and name available, but not my address.	<input type="checkbox"/>

RESPONSE ON BEHALF OF GROUPS OR ORGANISATIONS

e) The name and address of your organisation will be made available to the public (in the relevant GB Administration library and website and/or on the non-native species secretariat website). Are you also content for your response to be made available? If your answer is No we will treat your response as confidential.	Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>
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SHARING RESPONSIBILITIES/FUTURE ENGAGEMENT – ALL RESPONDENTS

We will share your response internally with other policy teams in GB Administrations who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content to be contacted again in relation to this consultation response?	Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>
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THE QUESTIONS IN THE DRAFT STRATEGY ARE REPRODUCED UNDER EACH CHAPTER HEADING BELOW. PLEASE TICK WHERE APPROPRIATE AND INCLUDE ANY COMMENTS IN THE SPACE PROVIDED.

1.) INTRODUCTION

1) Do you agree that non-native species, driven here by climate change, and which might pose threats of an invasive nature, should be within the scope of this strategy?

Yes: No:

Comments:

2) Do you agree that the eight key recommendations of the 2003 report remain valid?

Yes: No:

Comments: But with the caveats included in our response to that consultation (attached)

3) Are there new key areas of action, not embraced by the recommendations of the 2003 report that should be addressed? If so, what are these areas and how might they be addressed?

Yes: No:

Comments:

4) The strategy is predicated on the basis that tackling these issues must involve strong partnership working between all stakeholders through their various functions and roles – do you, or does your organisation support this principle?

Yes: No:

Comments:

5) Do you agree with the proposed shift towards an increased emphasis on a more preventative approach, in other words, an approach that involves investment now to reduce future risks and costs?

Yes: No:

Comments: 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. 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.

6) Do you foresee any significant pitfalls or opportunities in making this happen?

Yes: No:

Comments: The example of Japanese knotweed given in the document highlights not only the potential cost of an eradication campaign but also the risks of delaying any proposed campaign by even a few years. We would reiterate that we believe 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?).

7) Do you have any other comments on Chapter 1 - Introduction?

Yes: No:

Comments:

2.) STRATEGIC AIMS

8) Do you agree that the statement of Strategic Aims captures the scope of what is needed?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments:	
9) Do you have any other comments on Chapter 2 – Strategic Aims?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Comments:	

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3.) SCOPE AND TERMINOLOGY	
10) Do you agree with paragraph 3.1 that this strategy should aim to set out a high-level strategic game plan for the GB administrations and their related bodies whilst providing sign-posts for other non-governmental regional or local programmes and initiatives?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments:	
11) How do you think that this process can work best so that the strategy adds value to non-governmental programmes and initiatives?	
Comments:	
12) Do you agree with the approach described in paragraph 3.3?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments:	
13) Do you have any other comments on Chapter 3 – Scope and Terminology?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Comments:	

4.) THE GB NON-NATIVE SPECIES MECHANISM – ROLES AND RESPONSIBILITIES	
14) Do you feel that the GB Non-Native Species Mechanism has all the key components to oversee delivery of this strategy?	
	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments:	
15) Do you have views or suggestions on how to maximise the benefits to be gained from each of the GB Mechanism's component parts?	
	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Comments: We believe that the working groups will be a key element in the mechanism. It is essential that the RAP identifies current and likely threats and then establishes relevant working groups in a timely manner to ensure that the best advice is available to the Board.	
16) What pitfalls or difficulties do you foresee the GB mechanism will need to address?	
Comments: The major risk to the mechanism is a lack of stakeholder engagement and therefore we would fully support the role of the stakeholder forum in ensuring continued support for the mechanism.	
17) Do you have any other comments on Chapter 4 – The GB Non-Native Species Mechanism?	
	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Comments:	

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5.) STRATEGIC APPROACH	
18) Do you, or does your organisation, support this overall approach in Chapter 5? If not, what cost-effective alternatives do you suggest?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments:	
19) Given that resources always have limits, do you have suggestions or ideas for maximising the benefits to be gained from this approach?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments: We believe that to ensure a cost effective approach the statutory bodies must make the widest possible use of existing partnerships and mechanisms such as the Deer Initiative.	
20) Do you have any other comments on Chapter 5 – Strategic Approach?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Comments:	

6.) PREVENTION	
21) Do you agree with paragraphs 6.4 & 6.5?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments: We would wholeheartedly support this approach. One of our highest priorities in England and Wales is to prevent the further inappropriate releases of wild deer, in particular muntjac.	
22) Do you: a) Support the Chapter 6 (Prevention) objective?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
b) Support the Chapter 6 (Prevention) underpinning actions?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments:	
23) Do you have suggestions or ideas for maximising the benefits to be gained from these actions?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments:	
24) How can you or your organisation help through your specific functions, roles or responsibilities?	
Comments: The DI Partnership is more concerned with the management of existing wild deer populations and it is unlikely that new species will be introduced from abroad. However our role in monitoring deer distribution and density would allow us to identify any escapees or illegally introduced populations of wild deer (and other mammals) at an early stage.	
25) Do you have any other comments or suggestions for inclusion in Chapter 6 – Prevention?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Comments:	

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7.) EARLY DETECTION, SURVEILLANCE, MONITORING AND RAPID RESPONSE	
26) Do you agree with the general principle expressed in paragraph 7.6?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments:	
27) Do you: a) Support the Chapter 7 objective?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
b) Support the Chapter 7 underpinning actions?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments:	
28) Do you have suggestions or ideas for maximising the benefits to be gained from these actions?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments:	
29) How can you or your organisation help through your specific functions, roles or responsibilities?	
Comments: See Q 24. We would be happy to contribute to contingency plans where applicable..	
30) Do you have any other comments on, or suggestions for inclusion in Chapter 7?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Comments:	

8.) MITIGATION, CONTROL AND ERADICATION	
31) Do you agree with the general principle expressed in paragraph 8.3?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments:	
32) Do you: a) Support the Chapter 8 objective?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
b) Support the Chapter 8 underpinning actions?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments:	
33) Do you have suggestions or ideas for maximising the benefits to be gained from these actions?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
<p>Comments: Whilst collectively, non-native wild deer remain a national issue, it is at a local or landscape level that their impacts are felt most. It follows that any solution to these impacts can, therefore, only be achieved by co-operation at a local level (albeit, within a policy framework determined at a national and regional level). Consequently, we remain convinced that the key to successful deer management will only be achieved through the collaboration of local landowners and managers who can operate at a landscape scale.</p>	
34) How can you or your organisation help through your specific functions, roles or responsibilities?	
<p>Comments: The DI Partnership has been very successful at raising the local and regional awareness of deer management issues and bringing together individual land owners and managers to tackle acknowledged issues. This is a model which could be applied to other species management.</p>	

35) Do you have any other comments on, or suggestions for inclusion in Chapter 8?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Comments:	

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9.) BUILDING AWARENESS AND UNDERSTANDING		
36) Do you:	a) Support the Chapter 9 objective?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
	b) Support the Chapter 9 underpinning actions?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments:		
37) Do you have suggestions or ideas for maximising the benefits to be gained from these actions?		Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments: We believe that to ensure a cost effective approach the statutory bodies must make the widest possible use of existing partnerships and mechanisms such as the Deer Initiative.		
38) How can you or your organisation help through your specific functions, roles or responsibilities?		
Comments: See Q34		
39) Do you have any other comments on, or suggestions for inclusion in Chapter 9?		Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Comments:		

10.) LEGISLATIVE FRAMEWORK		
40) Do you:	a) Support the Chapter 10 objective?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
	b) Support the Chapter 10 underpinning actions?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments:		
41) Do you have suggestions or ideas for maximising the benefits to be gained from these actions?		Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Comments:		
42) How can you or your organisation help through your specific functions, roles or responsibilities?		
Comments:		
43) Do you have any other comments on, or suggestions for inclusion in Chapter 10?		Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Comments:		

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11.) RESEARCH		
44) Do you:	a) Support the Chapter 11 objective?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
	b) Support the Chapter 11 underpinning actions?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments:		
45) Do you have suggestions or ideas for maximising the benefits to be gained from these actions?		Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments:		
46) How can you or your organisation help through your specific functions, roles or responsibilities?		
Comments:		
47) Do you have any other comments on, or suggestions for inclusion in Chapter 11?		Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments:		

12.) INFORMATION EXCHANGE AND INTEGRATION		
48) Do you:	a) Support the Chapter 12 objective?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
	b) Support the Chapter 12 underpinning actions?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments:		
49) Do you have suggestions or ideas for maximising the benefits to be gained from these actions?		Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments:		
50) How can you or your organisation help through your specific functions, roles or responsibilities?		
Comments:		
51) Do you have any other comments on, or suggestions for inclusion in Chapter 12?		Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments:		

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13.) IMPLEMENTATION REVIEW	
52) Do you have any comments on Chapter 13?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments:	

CONCLUDING QUESTIONS	
53) Looking back over this strategy, do you feel that the Vision statement in the Introduction clearly encapsulates the overall approach set out?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments:	
54) a) As an overall strategic framework, do you feel that this strategy is balanced in terms of the proposed work areas?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
b) Could it be improved, if so, how?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
<p>Comments: We welcome the framework as a sound step forward. All the areas that we would like to see are included, but more priority, emphasis and clarity are required on the economic issues. Economic issues include: the real economic impacts of existing and future invasive non-native species; proper funding of research, monitoring and action. Any actions require wholesale buy-in to be successful. The primary stakeholders are landowners and their active participation and cooperation are essential. The key to that success will be full recognition of the economic impacts on them, including costs of control, which are currently neglected. Opt-out clauses should be given less prominence and need careful wording, reinforced with authority from above. The focus should be on action and achievements. Some broad guidance on cost-benefit analysis of environmental and social impacts should be included. If this document is actually a draft of the strategy document, then the introduction could usefully be wider ranging with references to following chapters.</p>	
55) Do you have any views on the relative balance of priorities across the areas covered in this framework strategy?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Comments:	
56) Are there any other significant issues or work areas not covered that should be covered, or that would not clearly fall under any of the existing work areas in the strategy?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Comments:	
57) Do you have any comments on the RIA document?	Yes: <input checked="" type="checkbox"/> No: <input checked="" type="checkbox"/>
<p>Comments: The RIA fails to identify some impacts, for example, while there would be benefits to many landowners (and Government targets) if muntjac were properly controlled, this could only happen with the direct cooperation and involvement of the landowners, some of whom may not be willing or interested. The cost of this burden and the impacts of any necessary legislation need to be identified at some point, perhaps at the implementation stage. However, postponement only shifts the problem down the line, probably reducing the chances of adequate resourcing and therefore actual implementation. We believe that the calculation of costs needs to be more sophisticated. The example given of the estimated cost of damage by grey squirrels is totally inadequate. For example, it fails to recognise the costs to farmers and there is no mention of quantifying the biodiversity and other social costs.</p>	

Thank you for completing this questionnaire. Please email your saved questionnaire to nss@csl.gov.uk