



Consultation response form - Invasive Non-native Species draft policy

Please submit your comments to NonNativeSpecies.consultation@naturalengland.org.uk

Closing date 1st May 2009

Name: Peter Watson	
Contact details/email: director@thedeerinitiative.co.uk	
Organisation: Deer Initiative	
IWe support Natural England's draft policy on Invasive Non-native Species	YES
1. Natural England believes that invasive non-native species pose a serious threat to terrestrial, freshwater and marine environments in England. This includes their potential impact on biodiversity, landscape, access and ecosystem services.	
Comments: These are statements of fact, with which we agree but not actually a policy. We would suggest you say what Natural England's response will be and that comes out in draft policies 2-6. We would suggest you have 5 policies, sitting under these statements.	
Evidence to support comments	
2. Natural England believes prevention of new invasive non-native species establishing in England is high priority. New incursions must be kept to a minimum and there must be rapid response to remove new invasions.	
Comments: We agree that measures to avoid or minimize new and unwanted introductions is a high priority. However we believe that equal priority should be given to control strategies for those species already present and established which are having negative impacts. We would suggest that with mammals it is also a high priority to prevent establishment of new communities in potentially vulnerable habitats within England.	
Evidence to support comments:	
3. Natural England believes that a risk-based approach is required to assess non-native species. This approach should be based on the precautionary principle where potential impact or uncertainty is high.	
Comments: We support this policy 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. We would be particularly keen to ensure that a risk based approach not if it take forever to discuss the risk while a species establishes then proves to be a problem.	

Evidence to support comments:

4. Natural England believes that the adverse impact of existing invasive non-native species in England should be reduced.

Comments: We agree. Much of our work is linked to reducing the adverse impacts of muntjac and fallow deer on designated sites. We believe that a list of the principle 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?).

Evidence to support comments:

5. Natural England believes that, where feasible, species populations, habitats and ecosystems that have been adversely affected by invasive species should be restored.

Comments:

We agree. However in relation to wild deer (and feral wild boar) this first requires control or eradication of the non-native deer. In consequence, restoration may not be possible, may take long time, may be costly. In some cases impacts may have to be accepted in the hope that restoration will occur naturally.

Evidence to support comments:

6. Natural England believes that invasive non-native species impact on a range of sectors and stakeholders and co-ordinated action is required, as recommended by the Invasive Non-native Species Framework Strategy for Great Britain.

Comments:

We agree – The Deer Initiative provides a model for successful partnership working, bringing together Government and NGOs to produce coordinated action at a landscape scale.

Evidence to support comments:

DI

Please submit your comments to NonNativeSpecies.consultation@naturalengland.org.uk

Closing date 1st May 2009