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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE  
AND NATURAL HABITATS

**Standing Committee**

23<sup>rd</sup> meeting  
Strasbourg, 1<sup>st</sup>-5 December 2003

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**Comments on  
the European Strategy on Invasive Alien Species**

*Document prepared by  
the Directorate of Culture and of Cultural and Natural Heritage*

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## **1. Bulgaria / Bulgarie**

### **REPUBLIC OF BULGARIA**



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After having considered and discussed in details the draft of European Strategy for the Invasive Alien Species, I have the pleasure to express our satisfaction with this excellent document, prepared in a profound way of exceptional professionalism.

It treats all aspects of this problematic including broad analyses and concrete recommended activities, thus the strategy has become a feasible document. I hope that the strategy will constitute the policy and activities of European countries with regard to Invasive Alien Species and to contribute considerably for native European flora and fauna conservation.

Wishing you a successful future work for completing the Strategy, please accept my most sincere congratulations,

## 2. Germany / Allemagne

Germany welcomes the development of the European Strategy on Invasive Alien Species (IAS) within the framework of the Bern Convention. This activity is considered to be a valuable contribution also to the efforts regarding IAS by the Biodiversity Convention.

Germany is eager to acknowledge that the document T-PVS (2002) 8 presented to the 22<sup>nd</sup> meeting to the Standing Committee (Strasbourg, 2-5 December 2002) has already reached a high degree of perfection.

The document:

- Is a valuable guide to the development of e European and also national strategy;
- Focusses on the special situation given in Europe;
- Specifies steps relevant to implementation; and
- Gives examples for such implementation.

Germany has, however, some strong reservations. These relate, for example, to a central biosecurity authority. This cannot be supported. In addition several aspects still seem to call for further clarification like the ones concerning species that have spread to Europe during historical ages.

Regarding detailed changes considered to be necessary by Germany please find enclosed an edited version of the document T-PVS (2002) 8 mentioned above.

German experts will be pleased to discuss these issues at the meeting of the Group of Experts on Invasive Alien Species scheduled for Strasbourg during 19-20 June 2003.

### 3. Hungary / Hongrie

#### Comments to Draft European Strategy on Invasive Alien Species

1. It is strongly proposed a consistent use of IAS (invasive alien species) where IAS are referred to, especially in the most important operative parts of the Strategy, e. g. 3.15, 7.1, 7.2 in order to avoid any kind of misunderstanding and misinterpretation.
2. Scope (p. 5.). It is not clear why viruses and prions and feral animals are *ab ovo* excepted. Latter can be especially important in certain cases, see e.g. 6.4 and “Eradication” par. 3. If viruses and prions are exceptions due to identification or methodology problems, than bacterias and microfungi should also be mentioned and certainly also viroids.
3. Terminology (p. 5). It would be useful to insert the definitions of the CBD Decision VI/23, considering the fact that definitons significant to the Strategy are given as footnotes in the CBD Decision.
4. 3.15. Not to swing to the other extreme. Certain aliens should not be considered, e.g. in Hungary: *Erranthus hyemalis*, *Narcissus stellaris*, *Dendrocopos syriacus*, *Serinus serinus*, *Streptopelia decaocto*, etc. (Thus, the term IAS should be used, see point 1. above)
5. Box on p. 15. Par-s 4.17-4.25 are referred to but they are not included into the Strategy.
6. 7.10. We think that the 2<sup>nd</sup> part of the paragraph is not needed (“including species ....”) since this is an essential part of the definition of IAS.

## 4. Iceland / Islande

### Comments on Draft European Strategy on Invasive Alien Species - Iceland

#### General comments:

The Draft Strategy is, in general, well written. However, we believe that there are far too many (currently they are 132!), and in many cases too specific and/or repetitive and overlapping recommended actions. The sheer number of recommended actions, in order to tackle a relatively well defined problem, makes the Strategy overwhelming and a bit pompous and increases the “risk of ignorance” by Member States.

Although the text on page 5 under “Terminology” states that “..this Strategy uses the definitions used in the Guiding Principles annexed to CBD Decision VI/23.”, we believe that this is not always obvious and that an effort should be made to harmonise the structure of the European Strategy (ES) more closely with the CBD Guiding Principles from 5 onwards, i.e.:

- CBD GP 5: Research and Monitoring = ES 1
- CBD GP 6: Education and public awareness = ES 2
- CBD GP 7: Border control and quarantine measures = ES 3
- CBD GP 8: Exchange of information = ES 4
- Etc.

In all cases, the ES should strive to go at least as far as the CBD GPs.

We further feel that the sequence of action from the national to the regional/ international is not always clear or logical in the present draft.

Therefore we suggest an exercise to:

- Group related actions in the current draft regardless of objectives.
- Half their number by combining similar actions and deleting redundant ones.
- Regroup the actions under the CBD GP (OK to use slightly different wording).
- Under each GP/ES objective, start with national actions and then move on to regional and international when appropriate.

#### Specific comments:

The following comments focus on identifying redundant and/or overlapping recommendations:

**Page 4**, under “Constraints to address”: third and fifth bullets should be combined and split differently so that “monitoring” is a separate issue, i.e.:

- Ease of introduction and movement (e.g. through the post, inadequate inspection and quarantine.
- Inadequate monitoring capacity.

**Page 5**, under “Strategy (draft)”: a) specify which “region” one is referring to in the first sentence; b) the list of objectives up front and the eight numbered objectives (1–8) should be harmonised.

**Page 6**: a) make sure that bullets 1.1–1.4 go as far as CBD GP 6, which says “States **should**..” ..when mitigation measures are required...**should** be set in motion..”

b) in the introductory paragraph to Objective 2 replace “identify and manage” with “prevent and manage”

b) bullet 2.1. and 5.11 need to be harmonised – both about national lists – also, the words “..based on risk analysis..” should be deleted or modified to e.g. “..based on experience..” as the former formulation places too high a burden on States and seems to go against the precautionary principle.

c) delete bullet 2.2. (covered by “regularly update” in 2.1). Delete 2.3 or move under “(Regional) Cooperation”

**Page 7:** a) combine 2.6 and 2.7 (both on research).

b) delete 2.9 or move under “Regional Cooperation”.

c) delete subheading on “Exchange of information: towards a regional information system” and harmonise bullets 2.10-15 with 4.1-4.16. Bullets 2.12 and 2.15 can be deleted regardless as both are inclusive in 2.10.

**Page 8:** delete 3.3. – obvious detail.

**Page 9:**

a) delete 3.7 (covered by 3.1).

b) delete 3.8 (covered by 3.4 – surly national review in federated countries would consider this).

c) move bullet 3.10 into the box as a potential component of a national strategy.

d) move bullet 3.11 to and harmonise with “(Regional) Cooperation”

**Page 10:** move 3.13 and 3.14 and harmonise with “Preventing unwanted introductions”

**Page 11:** a) combine 3.15 and 3.16 “Review species lists and conservation strategies etc. ..”.

b) combine 3.17 and 3.18, i.e. “Identify existing and promote new codes...”.

c) combine 3.19 and 3.20 (both on punishment).

d) combine 3.21 and 3.22. Harmonise 4.1- 4.3 with 2.10-2.15.

**Page 12:** a) delete 4.8 or harmonise with 4.1-4.3 and 2.10-2.15. Note: far to many recommendations addressing inter-governmental co-operation from different perspectives.

b) delete 4.9 and 4.11 (unnecessary).

**Page 13:** a) delete/harmonise 4.15 and 4.16 (this is part of inter-governmental cooperation – see above).

b) bullets 5.1-5.4 should be harmonised with other bullets on inter-governmental cooperation.

**Page 14:** delete 5.9 (included in 5.7)

**Page 15:** a) harmonise 5.11 with 2.1 (both on national lists).

b) delete 5.13 or harmonise with other bullets on inter-governmental cooperation.

We hope this will help you in preparing a second draft.

## 5. Italy / Italie

**Comments by the Italian authorities**  
***Direzione Conservazione della Natura***  
***Ministero dell'Ambiente e della Tutela del Territorio***

Following the presentation of the draft of the "European Strategy on Invasive Alien Species" this Ministry has send the text to several stakeholders potentially involved by the strategy.

We asked different Ministry, public agencies and scientific organisations for comments and reactions to the strategy. Even if we had no replay be some referent we recorded a general satisfaction and appreciation of the "Strategy". By the same time several sections of this Ministry and also other stakeholders pointed out the difficulties given by the real enforcement of the "Strategy".

For this reason, we ask that during the discussion and amending process of the "Strategy" particular efforts are deferred to the outlining of possible tools and legal framework for its enforcement.

Moreover Italy noticed the lack of a specific reference to insects and other animals used in agriculture and forestry for biological control, these alien species are potentially invasive but by the same time they are very useful for conservation purposes.



## 6. Moldova / Moldova

On behalf of National Experts of Bern Convention I would like to send to you our comments.

1. First – congratulation for European strategy on IASS elaboration.
2. We would like to inform that the vegetation of the Republic of Moldova is very infected by IAS because our territory is extensively used in agriculture domain. There are presented the IAS in all type of vegetation. Because the National Strategy and Action Plan on biodiversity conservation the problem of IAS is not related is necessary to elaborate specific National Strategy on IAS. Will be good to clarify the mechanism for support of National Strategy on IAS elaboration.
3. In forest vegetation of Moldova there are 3 vascular plant species very aggressive, which invaded the biggest forest areas.
  - *Acer nigundo*, invaded almost all forest from meadows of rivers and other forest from the humidified places
  - *Urtica dioica* and *Galium aparine* – invaded all forest from North and Centre of Moldova

The problem of IAS can be solved at regional level, for Moldova - in cooperation with Ukraine and Romania under auspices (to be identified).

In order to develop the regional cooperation we propos to create the regional commission from experts for elaboration of the Action Plan, methodology for IAS eradication, the list of AIS elaboration at region level, development of scientific program on invasive species inventorying and the methods of its eradication.

The mechanism for eradication should be clearly identified.

4. To evidence/ clarify the support for awareness – building in different governmental agencies, in special for countries with economy in transition.

## 7. Russian Federation / Fédération de Russie

### Comments to the European Strategy on Invasive Alien Species

by the Severtsov Institute of Ecology & Evolution, Russian Academy of Sciences, Research Group of Invasion Ecology & Interpopulation interactions

#### General comments

1. I think that would be better to exclude issues "Recommended actions" from the chapters of Strategy and put them in special chapter or separate document with title: "The action plan".
2. Need to add the special chapter on priorities of the strategy on IAS. I mean priority species, invasion corridors, ecosystems and regions with special condition for invasions.
3. In chapter mentioned before or in some other place of the Strategy it is necessary to determine peculiarities of strategies on IAS for ecosystems of different geographical zones and landscapes (ecosystems of polar deserts, tundra, forest, steppes, semi-deserts, mountainous ecosystems, marine and coastal ecosystems, freshwater ecosystems, wetlands, etc.).
4. Would be better to put chapter 3 "Strengthening policy, legal and institutional frameworks" to the end of Strategy and add to this chapter issues: "Control and efficiency criteria for the implementation of the Strategy", "Analytical and informational support of the Strategy implementation", "Approaches to the elaboration of regional strategies and action plans on IAS", "International cooperation".

#### Particular comments

To page 3:

In the beginning of the chapter "IAS status and trends in Europe" it would be good to put general preface with some words about importance of the invasive species problem.

The situation with European mink and American mink is not good example to support the idea that endangered species are threatened by alien species. This question not studied well yet. There are many ecosystems in Russia where European mink has disappeared before than American mink came there. The best example for Europe for demonstration IAS impact on ecosystems and economy is warty comb jelly (*Mnemiopsis leidyi*) invasion to Black and Asov seas.

To page 4:

In chapter "Constraints to address" it is needed to add: "lack of legislation".

To page 6:

In issue "Recommended actions" in parentheses of 1.3. It is needed to add: "...quarantine service organizations, universities, biological stations, academician scientific institutions, staff of protected natural territories...".

To page 7:

To Box it is needed to add:

- development of the general theory of invasion process including studies of vulnerability and sustainability of ecosystems subjected to IAS
- identification of main pathways of IAS penetration

for 2.7:

Is it possible to explain in detail mechanism of such support realization? What kind of European foundations can support basic research in field of IAS?

In issue "Recommended actions" the 2.14 is proposed as: "Draw up registers of experts and institutions, particularly for taxonomy, that can advise on technical IAS issues".

To page 9:

In chapter "National strategy", in second paragraph after words "...Wider consultation with sectoral stakeholders..." it is better to insert: "scientific organizations, protected area specialists,...".

To Box it is needed to add:

- General characteristic of situation with IAS in the World and Europe

To page 14:

In 5.4 it is needed to add:

- Support quarantine service work to control transported agriculture production;
- Support quarantine and custom services work to prevent illegal transportation plants and animals as pets.

To page 17:

In chapter "Special measures for isolated ecosystems", in first paragraph after words "...and centres of endemism" better to insert: "and diversification".

(It would be nice to extend this chapter and describe the question under consideration in detailed).

## 8. Slovakia / Slovaquie



MINISTERSTVO ŽIVOTNÉHO PROSTREDIA  
SLOVENSKEJ REPUBLIKY  
812 35 BRATISLAVA 1, NÁMESTIE ĽUDOVÍTA ŠTÚRA 1  
Department of Nature and Landscape Protection

***European Strategy on Invasive Alien Species  
– comments of the Ministry of the Environment of the Slovak Republic***

### ***General information on situation in Slovakia:***

- invasive alien species are subject of the § 7 of the Act of the National Council of the Slovak Republic No 543/2002 Coll. on Nature and Landscape Protection (in force since January 2003 and the §2 of the Order to this Act (in force since February 2003) – official English translations are being made and may be sent later if needed;
- by the Act mainly the following has been stated: definition of protection of natural species composition of ecosystems; prohibition of import, possession, growing, reproduction and trade in ...invasive alien species; obligations of the owners to remove invasive species specified; rights of nature protection bodies authorised in the light to eliminate invasive species, to enter lands etc.;
- in the Order: 7 invasive alien plant species listed together with ways of their eradication;
- group of experts on invasive alien plant species exists within the State Nature Conservancy of the Slovak Republic (expert body of the Ministry of the Environment of the SR); main areas of its work are: mapping of invasive alien plant species, database on invasive alien plant species; eradication and control of invasive alien plant species in protected areas; public awareness (so far 4 leaflets issued showing the most “common” invasive plant species – see attached; Manual on eradication and control of Giant Hogweed (*Heracleum mangegazzianum*), Manual on selected invasive plant species issued;
- group of experts on invasive alien animal species within the State Nature Conservancy of the SR is being formed;
- invasive alien species are subject to scientific programs of some research institutes within the Slovak Academy of Sciences as well as universities;

### **General information on the Strategy:**

- European Strategy on Invasive Alien Species („strategy“) prepared by Mr Genovesi and Mrs Shine in the frame of the Bern Convention (submitted for the 22<sup>nd</sup> Meeting of the Standing Committee – December 2002) is based on the Convention on Biological Diversity (Article 8h, Decision VI/23);
- It is aimed to “provide a tool to implement international commitments and best practices and to develop practical policies, measures and priority actions”;

### **General comments on the Strategy:**

- Strategy is a complex document summarising main problems and issues connected with the invasive alien species and addressing many institutions; due to a complexity of the strategy and wideness of problems and stakeholders the implementation of the strategy will be extremely difficult;

- It would be helpful to prioritise suggested activities in time (though all action are important) as it would not be possible to start with all the measures at the same time;

### **Specific comments – suggestions on the Strategy:**

#### **1. Introduction (page 3):**

- to add numbers of relevant articles and to add their texts (the same applies for relevant decisions) of all the conventions listed in the Strategy as a background documents (not everybody who reads the Strategy is familiar with the CBD, the Bern Convention, the Habitats Directive, the Birds Directive, CITES regulations);
- to add documents relevant to invasion species with respect to the Ramsar Convention (for example Ramsar Recommendation No VIII.18), the Bonn Convention (at least Article 3(4c)) as well as other related international documents such as the Global Strategy on Invasive Alien Species (Mc Neely et al. 2001);

#### **2. Terminology (page 5):**

- to add short definitions of basic terms (possibly as a separate annex) in the Strategy as not everybody who reads the Strategy at the same time has the Guiding Principles annexed to CBD Decision VI/23 and the IUCN Guidelines for the Prevention of Biodiversity Loss Caused by Alien Invasive Species;

#### **3. Species listing (page 6):**

- to add a new activity to those listed under 2.1 to 2.4: "Develop and regularly update (at least every 5 years) the European List of invasive alien species in all taxonomic groups" and at the same time to specify who is in charge of its creation, updating and distribution; and specify the way how this European List will be developed (this refers also to 2.9, page 7);
- to replace "at least every 3 years" by "at least every 5 years" which is more feasible from practical point of view;

#### **4. Research and monitoring (page 7):**

- **to add** to table under 2.6 (Indicators for priority research topics) **another indicator** - "evaluation of effectiveness of restoration measures";

#### **5. Exchange of information (page 7):**

- to specify among recommended actions linking of databases at national, European and global scale.

## 9. Sweden / Suède



SWEDISH ENVIRONMENTAL PROTECTION AGENCY

### Comments to Draft European Strategy on Alien Species

The European strategy on alien species is a very ambitious and valuable document, which contains excellent recommendations for the prevention of harm of alien species on biological diversity. The text of the strategy is in close accordance with and offers excellent guidance on the implementation of the Convention on Biological Diversity's *Guiding Principles on the prevention, introduction and mitigation of impacts of alien species that threaten ecosystems, habitats or species* on regional and national levels.

However, with the inclusion of the recommended actions, the Strategy has gone beyond the scope of a strategy and has become a detailed work plan for alien species. Many of the recommended actions are excellent and will be of great benefit in planning and carrying out actions to prevent harm to biological diversity by alien species. Particularly, the recommended action for the development of national biosecurity strategies in Actions 3.9 – 3.11 are of great interest. But in many cases, such as in Sections 5 and 7, the recommended actions are too detailed and go beyond the mandate of a nongoverning body, such as the European Council, and should be referred to the European Commission or the national governments. If recommended actions are to remain in the strategy, they should be amended to state the purpose or aim of the action and leave the organization or details of how this aim is to be achieved to the governing European Commission or the national governments.

One example of the need to amend a recommended action is Action 3.1, which at present, is not in accordance with Swedish national environmental policies. Swedish environmental policy is based upon political decisions, which specify a decentralized responsibility for the environment. Each government agency is equally responsible for environmental concerns within their respective sectors. It would be in violation of this policy to develop a national biosecurity authority to lead, coordinate and oversee the work with alien species. This recommended actions could be amended to include that biosecurity aspects should be addressed at the national level, but avoid detailing the appearance and function of an authority.

Other actions such as 3.21, which calls for the development of measures according to the polluter-pays-principle in order to allocate costs of recapture, eradication or control to persons responsible for unlawful introductions or escape, would be exceedingly difficult to implement with existing laws and praxis, especially retroactively. Those alien species which presently pose a potential harm to biological diversity in Sweden have been introduced to the environment by businesses operating under legal standards and permits, albeit standards which have proven not to be efficient in protecting the biological diversity. Until useable, reliable and scientifically certain methods for risk analysis of alien species impacts on biological diversity are developed, it is not possible to use the polluter-pays-principle with regards to alien species, other than in a very few extreme cases.

Fulfilment of the strategy with its recommended actions will require enormous resources for all national and regional environmental protection agencies, which is probably unrealistic without a major re-allocation of priorities and resources. The recommended actions should be prioritized in order to make the strategy more useable. The European Council through the Bern Convention could make a very valuable contribution to work with alien species through increasing and improving cooperation between national governments and stimulating regional cooperation and initiatives. The recommended actions in Section 4 Regional cooperation and responsibility offer excellent possibilities for the European Commission and the Parties of the Bern Convention to develop efficient, valuable cooperative efforts in reducing the impacts of alien species on biological diversity. This development of regional and national cooperation should be the first and main priority of the Bern Convention's efforts in the work on alien species.

## **10. Switzerland / Suisse**

### **Suggestions to amend the draft European Strategy on Invasive Alien Species**

#### **General comments:**

The main impediment to the implementation of the Strategy are the high financial and human resources required. Therefore, to make best use of available resources, priorities need to be defined and action has to be synchronised.

Even though invasive species are acknowledged to be an international problem, the local dimension of the problem needs to be considered. The different geographic dimensions used in the strategy (i.e. regional, subregional, and local) should be defined.

Attention should be paid to the fact that the Strategy manages animal species as well as plant species and that a different approach is needed for plant and animal invasive species.

#### **Scope:**

##### **Amendments suggested to the second paragraph:**

\* alien species and lower taxonomic categories, subspecies and varieties in all taxonomic groups, except for genetically modified organisms,[:] viruses and prions,[:] and feral animals of domestic species (cats, dogs, goats, etc.).

With the suggested alternation of the punctuation, the list of the organisms to which the Strategy does not apply, is unequivocal.

#### **Collecting, managing and sharing information, species listing**

##### **Amendments suggested to recommendation 2.1, p. 6:**

2.1 Develop and regularly update [(at least every 3 years)] comprehensive national lists of alien species [in all taxonomic groups] independent of their taxonomy recorded in their territory, starting with invasive alien species and species from which data are available already.

Lists include information on date of introduction, means of arrival, range, population size, impacts recorded and, based on risk analysis, classification of species as harmful, low risk or beneficial and whenever available information on control methods.

The development of comprehensive lists of alien species in all taxonomic groups is a process which will last many years until comprehensive results will be gained. However, a rapid overview on the impact and spread of alien species in Europe is needed to assess the priority problems regarding invasive species. Furthermore, a preliminary assessment based on existing information, will provide an important source of information on which to base initiatives. Therefore, in accordance with the GISP Toolkit, we suggest to prioritise the listing of alien species based on existing information.

Considering alien species to be an international problem, the spread of information concerning experiences on control methods is important. Therefore, we suggest to include such information in the national list of alien species, in order to be disseminated through the national CHM according to recommendation 2.4.

##### **Amendments suggested to recommendation 2.4:**

2.4 Create and regularly update alien species page in national biodiversity Clearing House Mechanism (CHM) or equivalent, that includes species lists and links to relevant IAS sites and resources.

The establishment of a review procedure to rapidly include newly detected alien species into the national list (recommendation 2.2) and the creation of an alien species page in the national Clearing House Mechanism are recommended (recommendation 2.4). Considering the generally limited resources available to combat invasive alien species (comp. UNEP/CBD/SBSTTA/6/INF/2) and the above mentioned recommendation on reviewing and publishing information, we suggest to drop the

recommended interval of at least 3 years for updating the national lists (recommendation 2.1), but to recommend a regularly update of the alien species page in the national CHM. Furthermore, an update of the national CHM secures a rapid dissemination of information.

**Regulating intentional introductions, p. 15:**

**Amendments suggested to the black list:**

\* Black list: species whose introduction is strictly regulated (risk assessment to be carried out) [prohibited (no risk assessment to be carried out)]. This should include species/groups of species known to be problematic for native biodiversity (e.g. certain terrestrial vertebrates, certain aquatic plants, allergenic plants with major health implications).

A strict prohibition to introduce black list species may also target economically important species for the agriculture, forestry, or human health sector. Therefore, the prohibition of the introduction of black list species will result in national black lists reflecting economical and political interests predominantly instead of scientific baselines which urgently need to be established. In accordance with the GISP Toolkit of Best Prevention and Management Practices for Invasive Alien Species we suggest to strictly regulate the introduction of such species.



## **11. Turkey / Turquie**

### **The comments by Turkish site on the draft of European Estrategy on Invasive Alien Species**

This draft Strategy is evaluated as a useful tool to help countries to implement commitments and specific measures related to Invasive Alien Species (IAS) under international conservation agreements such as Convention on Biological Diversity, Bern Convention, and Birds and Habitats Directives and CITES Regulation.

Increased volumes of trade, transport and tourism in both global and European levels are driving an enormous growth in species movements. Several endangered species in natural habitats are threatened by introduced invasive alien species. In many countries current biological invasions have imposed huge losses on their biodiversity, health and economy. Therefore, co-ordinated measures and co-operative efforts should be developed and implemented gradually throughout the region to minimise the adverse impacts of IAS. This Strategy should be developed with parallel to other relevant international endeavours, particularly activities of International Civil Aviation Organisations (ICAO). The outcomes and comments on “Questionnaire on the Transport of IAS by Air”, prepared by ICAO, should be taken into consideration at the stage of formulation of this Strategy.

We believe that the Strategy is designed very comprehensively, detaily and completely, and all of these make it harder and more expensive to be implemented by countries.

It is thought that this draft Strategy was prepared for the aim of functioning the financial institutional and legislative mechanisms of European countries on this matter, and gives some responsibilities to European countries within the framework of the co-operation between European countries and developing and neighbouring countries. We believe that although, these matters are included in the recommended actions, the responsibilities of developing and neighbouring countries could not be reduced. On the other hand, the recommended actions are not listed as their priorities. This will cause to some constraints at the stage of preparation of implementation programs.

Under the “Species Listing”, the sub-title of “Collecting, Managing and Sharing Information”, it is proposed that the list of national alien species should be developed and updated regularly (at least every 3 years). We do believe that developing countries like Turkey will face to some severe difficulties and constraints at the implementation of this action. As, IAS and their invasion areas have not still be determined exactly due to lack of monitoring activities and information. Additionally, this issue will also cause some problems at the preparation of national reports in harmony with the Strategy.

Under the “Species Listing” of Part 2 of the Strategy, a common format should be developed consensually for information on species including taxonomy, biological parameters and their harmful effects for the aim of providing common language between countries.

It is required to be more careful in the movement of economically important species into different habitats. If there is any risk for other species in habitats by introduced species, such a kind of implementation should not be permitted.

Any endemic species peculiar to any area should be conserved and all activities should be undertaken without any adverse effects on these endemic species.

It is required to give full attention in the movement of either animal or plant species to another countries at the aim of cultivation. Because, these species could invasive to the other areas.

Hybrid species are exported in the form of eggs or seeds due to their resistance and growing capability, and also they are assessed as harmless species because of their non-reproductive characteristics. However, it is observed that they are rarely reproduced and possible to mix something into their eggs.

Sticky organisms are continously carried to other regions by the ships. For that reason, the ships should be repainted regularly with specific paintings which prevent the organisms to be stucked.

Anchoring tools cause the movement of eggs and seeds of aquatic organisms. Sailors should be informed on this matter.

It is need to be careful at all scientific studies made by any species, imported or carried for the aim of scientific studies. Some specific measures should be taken in order to prevent those species to be out of the laboratories.

If there is no way to recover invaded species, it should examine the possibilities to use them in the industry medicine, paint cosmetics etc. for getting economic benefits.

Natural predators of any invaded species and these predators or their alternatives in the new introduced area should be researched.

Finally, all recommended actions in the Strategy should be harmonised with other relevant international conventions.

## **12. United Kingdom / Royaume-Uni**



### **UK comments on Bern Conventions Draft European Strategy on Invasive Alien Species**

The UK takes the issue of invasive alien species seriously and wishes to contribute constructively to help develop the Bern Convention's Regional European Strategy.

In accordance with the general view at the December Standing Committee, the UK believes that the first draft of the strategy provides a good starting point for development of a European regional approach, although it will require considerable further refinement and revision before it can be adopted. It is welcomed that it is intended that it broadly follows the approach of the CBD Guiding Principles.

The UK has been undertaking its own review of policy and practice on invasive alien species covering England, Scotland and Wales. The report of this policy review is due to be published in the near future. The Government will be considering the issue further in light of the report and recommendations of this review. I will supply a copy of the report to the Bern Convention Secretariat as soon as it is available so that its conclusions can help feed into the process of developing the Bern strategy.

The UK's final position on the strategy is reserved pending discussions within the European Union. As explained at the Bern Standing Committee, given the complexity and wide scope of the issue it is unlikely that the EU Member States will be in a position to adopt the strategy by December 2003 and so the timetable for its adoption should be extended. I have copied this letter to the European Commission.

I believe the focus must be on the best means of addressing the most significant problems caused by invasive alien species, and have a number of constructive comments on the draft strategy.

#### **Level of detail and number of recommendations**

The first draft of the strategy is too complex and detailed, with too many recommendations. The recommended actions in the strategy are very comprehensive. However, having so many detailed recommendations dilutes the focus and key messages with the result that the most important issues are rather lost in the sheer quantity of recommendations. The strategy therefore provides a good starting point but needs to be greatly simplified to focus on the key objectives and on the key measures required to achieve them.

It is important to bring out the most important issues and give them greater prominence. The strategy therefore needs to make clear which key recommendations or areas are the priorities for action. A smaller number of key recommendations are likely to be more effective. This will be an important issue to address.

I appreciate that the strategy attempts to identify a series of practical steps which can be taken. One option to simplify the key messages, without losing much of the practical guidance, might be to have a simpler front section setting out broad principles and strategy with some of the detail perhaps included as a second section covering examples of good practice that should be encouraged.

A less proscriptive approach to the detail of how its objectives are to be addressed could also be beneficial. Different approaches may be appropriate or more feasible in different countries. This would allow other options to be pursued which might address the objectives.

## **Style and structure**

The structure of the report needs to be improved so that it is clearer and easier for non-experts to understand. The section “Who is the strategy for?” states that, in addition to governments, it is aimed the range of stakeholders involved in the movement and use of species. The strategy must therefore be clear and straightforward if these stakeholders are to understand the issues and support the measures proposed to address them. For example, one straightforward change is that the introduction should begin with a description of why alien species are a problem before launching into the international instruments which address the issue. This sort of understanding and acceptance of the need for measures by stakeholders, and the general public, will be crucial in the success of invasive alien species policies.

The introduction would further benefit from a short description of the CBD’s three-stage hierarchical approach to addressing invasive alien species so that the reader then understands the reason for the sections that follow. It would also be useful if the introductory section setting out the objectives of the strategy was expanded to explain the key areas where action is needed so that it seems more logical when going through the subsequent sections.

The substantive sections of the report are currently rather impenetrable and could do with considerable re-working to make it clearer why action is needed on certain points. I suggest that the order of the sections is revised, for example, section 1 on building awareness might sit better within the three-stage approach rather than on its own as the very first section (it would aid prevention measures, possibly assist with surveillance and could increase public acceptability of management measures). Parts of the current order changes from subject to subject without following an obvious logical order.

The recommendations also need to be clear; some are quite difficult to work out exactly what is intended. For example, there are a number of fairly vague recommendations covering international co-operation and information sharing. This area would particularly benefit from being simplified and more tightly focussed on a much smaller list of recommendations.

There is also a need to be clear about the distinction between alien species and invasive alien species. Sometimes this clarity is lacking, e.g. in recommendations 3.19 and 3.20. The majority of alien species do not become invasive nor cause problems. Indeed, many alien species have considerable benefits to society, for example as agricultural, horticultural and forestry crops, or in the pet industry. The strategy should therefore be careful to address the threats posed by invasive alien species without unnecessarily over-regulating or hindering legitimate activities. I suggest it would be useful to clarify this in the introduction.

## **Regulatory impact of recommendations**

There appears to have been no analysis within the strategy of the costs and benefits of the various recommendations, many of which could be very expensive to implement or could have significant impacts on other sectors. This is a very important issue and it is absolutely essential that this is addressed if the recommendations are to be taken up and implemented. The potential cost of implementing the strategy was mentioned several times at the December Standing Committee and is therefore a real issue of concern for contracting parties. It is therefore essential that the cost implications of recommendations are considered, in order to ensure that they are proportionate and feasible. In addition to the implementation costs, this consideration must also take into account the impact on other sectors and stakeholders.

For each recommendation, I suggest that it needs to be considered what is the purpose and intended effect of the recommendation, what are the options for addressing it, what are the risks for each option, what are the benefits and what are the costs (to all sectors). These are the sorts of issues which individual states will have to consider before being able to implement recommendations.

Some of the recommendations in the current draft are ambitious, would probably be expensive to implement and may well not meet such tests or be feasible to implement. There is a tendency to adopt a heavy regulatory approach which gives the impression of having been developed in isolation from other considerations, for example 3.19 which suggests there should be offences introduced for unauthorised introductions, movement or holding of alien species. For unauthorised introductions of

alien species this may be reasonable but by implication this recommendation seems to mean that movement or holding of all alien species must be subject to a system of authorisations, whether invasive or not. This would necessitate the setting up of a huge bureaucracy to administer such a system and introduction of a large regulatory burden. There is no examination of whether or under what circumstances this may be warranted, or whether it is meant to apply to all alien species or only to the most serious threat species. Similar points apply in respect of recommendation 3.20. Another section which appears to have a very regulatory approach is recommendations 5.7, 5.8 and 5.9. These all focus on regulatory regimes relating to import, when it is introduction into the wild (not import across a political boundary, which may be perfectly legitimate) which is the priority to be addressed.

I think if the regulatory impact is considered then many of the recommendations may need to be altered. It is important to get the balance right between the benefits which regulation might provide and any additional burdens that might be imposed. There will be many occasions when alternatives such as codes of practice or improved guidance and advice are a better answer. This is one of the most important issues which will need to be tackled in developing the strategy. It should also not be assumed that stakeholders would support significantly greater regulation.

There is also a general need for the strategy to keep sight of existing binding obligations on states. Such obligations may constrain or influence the measures which can be taken, particularly in respect of regulation of activities such as trade.

More time will be needed to develop definitive views on much of the detail of the draft strategy, especially given the UK view that a considerable revision is needed to the document's general structure and scope, and much refinement of the content of the recommendations. However, I have some preliminary comments, annexed to this letter.

#### **Annex – Preliminary comments on detail of the strategy**

More time will be needed to develop definitive views on much of the detail of the draft strategy, especially given the UK view that a considerable revision is needed to the document's general structure and scope, and much refinement of the content of the recommendations. However, preliminary comments are included below.

##### *Section 1 - Building awareness and support*

Agree with the principles that public awareness and education, and stakeholder involvement are all important.

##### *Section 2 – Collecting managing and sharing information*

Agree that knowledge is required of those alien species present and means of making information accessible nationally and internationally. Also agree that research to support prevention is a priority, including the focus on introduction pathways, i.e. risk assessment.

##### *Section 3 – Leadership and co-ordination*

The development of national biosecurity strategies proposed under recommendation 3.9 looks useful. This could be expanded to also include a reference to the use of risk assessment/analysis. The references to a single biosecurity agency in recommendation 3.1 could also be expanded to allow for an evaluation of options to deliver the equivalent result, as it may be that other mechanisms could deliver the required outcomes.

It is important to bear in mind existing trade commitments and obligations binding on the parties concerned (for example in recommendation 3.4, 3.12, 3.14) and which will be a key issue in implementing recommendations. It would be useful for there to be some reference in this section for the need for possible actions to be assessed in terms of their likely compliance with international trade rules, in particular taking account of participant's obligations under the WTO Agreement on Sanitary and Phytosanitary Measures ("the SPS Agreement"). It would also be helpful also to have a reference to the need to avoid taking measures which amount to arbitrary or unjustified, discrimination or a disguised restriction on trade.

I had concerns over the proposed approach for ancient introductions. The UK has many ancient introductions, both animals and plants, which have become valued by society and can have benefits, for example, some ancient introductions can play a role in helping sustain biotopes that we value, e.g. rabbits in species-rich short-sward chalk grasslands. These are certainly not priorities in terms of invasive alien species policy. The text needs to recognise this. The strategy should give priority to tackling new and relatively recent invasive introductions, rather than spend time and energy classifying ancient introductions for which there is no intention to take measures to eradicate or control. I suggest that the only exemptions to this might be where it is feasible to restore the original ecosystem and where such restoration is a conservation priority (an example would be a small island containing internationally important bird populations which are affected by introduced rats).

The idea of stakeholders' codes of conduct (recommendation 5.10 is useful and fits well with the points made above in respect of regulatory impact. However, I believe codes of conduct are prevention measures aimed at preventing unwanted introductions of alien species as the result of other activities. This should therefore fall within the prevention section.

However, as noted above there are concerns about regulatory impact of some of the recommendations, e.g. recommendation 3.19 and 3.20. This section needs further work..

#### *Section 4 – Regional Co-operation*

In general, section four sets out some sensible proposals and follows well-recognised internationally accepted methods such as use of prior authorisation procedures relating to the movement and release of species across frontiers. However, I had concerns about recommendations 4.4 and 4.5 which could in practice be potentially problematic from a trade perspective. Any harmonisation of prohibitions on the introduction of species would need to be conducted on the basis of a thorough assessment of their justifiability in trade terms.

#### *Section 5 – Preventing unwanted introductions*

There is no clarification of how the precautionary approach should be applied. To address this, last sentence of the first paragraph under 5 should be extended to include a reference to the WTO's SPS Agreement. This allows countries to set their own standards, but it also says regulations must be based on science. They should be applied only to the extent necessary to protect human, animal or plant life or health and they should not arbitrarily or unjustifiably discriminate between countries where identical or similar conditions prevail. The following words could be added at the end of the sentence: " and take full account of the rules and obligations contained in the SPS Agreement in regard to its application."

Recommendations 5.1 to 5.6 offer a balanced approach that places the emphasis on a multilateral coordinated response based on the use of existing international standards and the development of new standards.

As noted above, I had concerns about the regulatory approach in recommendations 5.7, 5.8 and 5.9. These all focus on regulatory regimes relating to import, when it is introduction into the wild (not import across a political boundary, which may be perfectly legitimate) which is the priority to be addressed.

Care should be taken with the recommendation to develop a "black list" (Recommendation 5.11) in order to ensure compliance with trade obligations. Also, whilst a "white list" could be a useful tool, care will also be needed with any publicity to avoid giving the impression that uncontrolled releases of listed species are encouraged.

Recommendation 5.15 raises some issues again relating the regulatory impact. It assumes that there must be a permitting system for movement of species within a state. The point that a species can be native to one part of a state, but alien to another part, is perfectly valid but the assumption that this requires some kind of licensing regime has not been properly explored.

*Section 6 – Monitoring and surveillance*

Agree that adequate surveillance arrangements for invasive alien species are needed. States may wish to consider what information can be gained by including alien species within existing wildlife monitoring arrangements.

*Section 7 Mitigation of impacts*

Recommendation 7.6 involves introducing new regulatory burdens. The comments made elsewhere about consideration of impacts apply here also.

The strategy suggests that eradication should not be attempted unless it has public support. This gives rise to some interesting issues. In the UK, public support may be difficult to achieve for eradication programmes, especially in respect of species such as birds and mammals. To some extent this could be addressed by more education and awareness about the issues but, even where there is a sound conservation argument for eradication, a significant proportion of the public are likely to oppose eradication programmes on grounds of animal welfare. I therefore suggest this statement is qualified in some way.

There also needs to be a recognition that for many of the long-established invasive alien species currently present in the wild, it will simply not be feasible to undertake eradication campaigns.

### **13. Convention on Biological Diversity (CBD) / Convention sur la diversité biologique (CDB)**

We have found the draft Strategy to be quite comprehensive. As requested, please find below our comments:

- a. the scope of the Strategy (page 5) excludes GMOs/LMOs however some of them have the potential to become invasive alien species. This was probably due to the fact that you have a number of Directives addressing the introduction of GMOs.
- b. Many references are made to the IUCN Species Survival Commission. It may be worthwhile to make reference also to the Global Invasive Species (GISP) given its central role in addressing invasive alien species under the CBD.
- c. In the section on “precaution and risk analysis” (page 10) reference is made to environmental impact assessment. You may wish to also make reference to the guidelines adopted by the sixth meeting of the Conference of the Parties (COP).



## 14. Grupo Especies Invasoras (GEI)

New

**Eliminate**

Explanation

**(Bis)** New paragraph to be included

### Objectives

(Page 5) The Strategy promotes the development and implementation of coordinated measures and cooperative efforts throughout the region to [prevent the new introductions of alien species especially of invasive alien species and to](#) minimise adverse impacts of invasive alien species (IAS) on Europe's biodiversity, economy and human health and wellbeing.

### Terminology

(Page 5) It could be useful to include a glossary at the end of the Strategy including also the definition for the terms regional and subregional.

## 2. Collecting, managing and sharing information Page 6.

### *Species listing*

2.1 (Page 6) Develop and regularly update (at least every ~~3~~ [1](#) year) comprehensive national list of alien species in all taxonomic groups recorded in their territory. List include information on date of introduction, means of arrival, range, population size, impacts recorded and, based on risk analysis, classification of species as harmful [or](#) low risk ~~or beneficial~~. [List should include information about methods of prevention and mitigation.](#)

### *Research and Monitoring*

**2.6 (Page 7) Prioritise research that directly supports [prevention of new introductions and prevention and minimisation of impacts](#) (see Box).**

Indicators for priority research topics

- Risk analysis of different pathways [and vectors](#), categories .....
- [Methods to minimize impacts](#)
- [Risk analysis of different vectors of unwanted introductions](#)
- [Sample methodology of vectors \(e.g. Ballast Water sampling\)](#)

### *Exchange of information: towards a regional information system*

2.13 (Page 7) As soon as practicable, link regional information mechanisms to the global network of ~~IAS~~ [AS](#), especially [IAS](#) databases currently under development.

2.14 (Page 7) Draw up registers of experts, particularly for taxonomy, that can advise on technical ~~IAS~~ [AS](#), especially [IAS](#) issues.

2.16 (Page 7) [Hold regular meetings and workshops among experts on IAS issue to update the information \(e.g. ecology, methods of mitigation, etc.\).](#)

## 3. Strengthening policy, legal and institutional frameworks

### *National strategies*

3.9 (Page 9) Launch consultative process to develop a national biosecurity strategy (see Box), drawing on the national biodiversity strategy and other relevant policies.

#### **Possible components of a national biosecurity strategy**

- Status and trends of [AS and](#) IAS in the country: identification of specific problems (§ 2)

- Outline of main pathways, [vectors](#) and particular risks.
- .....

#### *Principles and tools*

3.14 (Page 10) In cooperation with relevant organisations, support the development of common decision-making criteria and risk standards regarding the movement of alien species through ~~trade~~ [the different](#) pathways [\(e.g. trade, tourism, etc.\) and vectors](#).

#### ***Approach to ancient introductions.***

##### **Last Paragraph (Page 10):**

European conservation strategies should be revised to ensure that they give priority to conservation of endemic and native species. No conservation efforts should be devoted to the protection of alien species. In the case of species ~~introduced several millennia~~ already introduced, conservation .....

There are some alien species introduced in the past (several centuries ago but not several millennia) which are completely integrated in the ecosystem. These are not invasive and are considered part of the “native” fauna (for example *Genetta genetta* in the Iberian Peninsula). Conservation efforts should be devoted to these species if necessary.

3.15 (Page 11) Review species list (national/Bern Convention/Red List) to ensure that no alien species are listed for legal protection [with the exception of the above mentioned species \(see approach ancient introductions\)](#).

## **4. Regional cooperation and responsibility**

#### *Cooperation between States*

4.5 (Page 11) Implement standards and recommended best practices for regional pathway [and vector](#) management to [prevent new introductions and](#) minimise risks of unintentional introductions.

#### *Subregional cooperation*

4.16 (Page 13) Promote development of common approaches and standards for pathway [and vector](#) management through .....

## **5. Prevention ~~unwanted introductions~~**

### **Note: in order to make this point more comprehensible we suggest:**

It's necessary to create a section of “Unintentional introductions” (that contains the following items: ‘Prevention source: managing exports and pathways’ and ‘Prevention on arrival: border control and quarantine measures’) and another section of “Intentional introductions” (that contains the following items: ‘Regulating intentional introduction’ and ‘Minimising unwanted introductions within the country’). At last, create another section that contains the sections ‘Special measures for isolated ecosystems’ and ‘Prevention of natural spread’.

#### *Prevention at source: managing exports and pathways*

[5.3 \(bis\)](#) (Page 14) [Promote development of good practice and standards for managing the fouling of the hull ships \(e.g. shipyard\)](#).

#### *Prevention on arrival: border control and quarantine measures*

5.9 (bis) (Page 14) Regulate movements of species and water transfers between separate drainage basins and catchments to prevent the introduction of organisms to a eater system outside their natural range.

#### *Regulating intentional introductions*

5.11 (Page 15) To facilitate .....

- White list: species classified as ~~beneficial or~~ low risk ..... ~~(see (see § 4.17 4.25))~~. (these points don't exist in the draft of the strategy).

*Minimising unwanted introductions within the country.*

5.17 (bis) (Page 16) Identify the risks associated with the introduction of exotic biological control agents, developing legal measures to regulate their sale and use as well as previous contingency plans, taking into account the IPPC Code of Conduct for the Import and Release of exotic biological control agents.

*Special measures for isolated ecosystems*

~~5.29 (bis) (page 17) Regulate movements of species and water transfers between separate drainage basins and.....~~ moved to 5.9

*Prevention of natural spread*

5.33 (page 17) Give priority to the eradication and/or containment of established alien species that could potentially spread outside the ~~state's territory~~ affected areas.

## **6. Early detection and rapid response**

*Monitoring and surveillance*

6.4 (page 18) Organise regular surveillance of areas vulnerable to invasion, entry points (e.g. ports, harbours, open moorings, airports, etc.) and important and/or isolated ecosystems (protected areas, islands, etc.). In transboundary sites.....

## **7. Mitigation of impacts**

*Containment*

7.15 (bis) (Page 21) Prioritise areas for containment based on classification of natural value degree of disturbance and feasibility of success.

*Control*

7.16 (bis) (Page 21) Establish priority lists of IAS for control.

7.18 (bis) (Page 21) Prioritise areas for containment based on classification of natural value degree of disturbance and feasibility of success.

## **8. Restoration**

8.8 (page 22) In forestry, support the use of native species over alien species in the establishment of plantations and the restoration of degraded ecosystems, in accordance with the Forest Stewardship Council's Principles. ~~Alien species should only be used when they are low or no risk and their performance is greater than that of native species.~~

## 15. Herpetological Conservation Trust

HCT is very pleased to endorse any strategy aimed at tackling the insidious problems of **invasive** alien species, and to that extent we are pleased to support pages 3 - 9 inclusive of the draft strategy. However, we would not wish to give any support to a policy which then sidelined resources towards tackling existing localised populations of benign introductions, and especially those where the fauna (and the flora?) is already threatened on similar habitats within the same European Biogeographic Region; eg. certain herpetofauna of lowland heath, coastal sand-dune, and pastoral ponds.

In terms of any potential list for such invasive alien species, HCT would like to propose:-

*Crassula helmsii*; *Myriophyllum aquaticum*; *Azolla filiculoides* and *Gaultheria shallon*.

Red-eared Terrapin and American Bullfrog.

We would also like to see consideration given to tackling

1. various alien Pine species where these have been planted on and/or are subsequently invading coastal sand-dunes and lowland heathland;
2. other distinct sub-species of herpetofauna from those occurring naturally within a country where these have been inadvisedly allowed into the pet trade, eg. Russian and old USSR area sub-species of *Coronella austriaca* and *Lacerta agilis* now openly sold in the UK despite the obvious biodiversity risks from their cross-breeding via release or escape

Returning to the draft document, we have to disagree strongly with part of the concept evoked in the second paragraph of "Approach to ancient introductions", or therefore the recommended action 3.15. If, for example, the species concerned was already protected via Berne Convention listing (and/or Habitat & Species Directive) and not least because its overall habitat was declining and under threat, and it was not invasive or a threat to other endemics, it should not be included. Thus the isolated colonies of *Podarcis muralis* in S.England pose no conceivable threat while at the same time having some compensatory value for the loss of colonies in neighbouring Belgium and the Netherlands. A similar defence could be put forward for the 34 year old established population of *Lacerta agilis* on the sand-dunes of the Hebridean isle of Coll.

The present wording of the strategy could be interpreted to encourage an unnecessarily harsh, if not draconian approach to such situations.

If we take the definition back from the more recent/historical, there are also "ancient" but benign introductions which are now legitimate parts of Europe's biodiversity. We are particularly thinking of the Chameleon's of S.Iberia, the Balearic and Sardinian tortoises, and the African Chameleon colony at Pilos in Greece.

While we also support the proposed components of a listing system for alien species (page 15), its white list refers to paragraphs 4.17 - 4.25; unfortunately page 13 ends on paragraph 4.16! Are we missing something?

We must also object to proposed actions 6.6, 7.1, and 7.2 unless or until these are qualified by the insertion of invasive as a pre-condition of these proposed actions.

In the case of Recommended action 7.10, we would advise that the word "including" is substituted by "prioritising", otherwise the whole exercise is opened up to blinkered bureaucracy and a waste of resources directed towards established introductions which are benign per se and may even be beneficial to European biodiversity.

We also received the report from the Group of experts on Invasive Alien Species and would just like to correct a UK situation which may be wrongly interpreted. The UK reports under the Implementation of Recommendation No. 57 for "Established non-native species" that Schedule 9 to the Wildlife & Countryside Act 1981 lists invasive non-native species which are established in the wild and have been identified as undesirable, as a result of impacts ...

This statement is not wholly correct and we have attached 3 pages to this email to illustrate how this outdated and as yet unreviewed schedule erroneously contains exactly the benign herpetofauna which concern us and which are also often a valid conservation target in terms of NW.Europe, ie.

*Hyla arborea; Podarcis muralis; Emys orbicularis; Alytes obstetricans and Bombina variegata.*

Please therefore do not take such a legislative faux-pas as a method to be copied any more than the UK's initial SSSI legislation was to be considered within a European Protected Areas framework.

Fortunately, the latter has now been considerably improved.

## 16. International Association for Falconry and Conservation of Birds of Prey

**Falconers take greatest interest in the conservation of biological diversity and are well-informed on the issues that affect it; IAF had a delegate at the 6<sup>th</sup> CoP of the CBD in The Hague. IAF supports and engenders initiatives that are likely to maintain or improve the richness of natural ecosystems.**

However, the best intentions may have unpredicted negative side effects. Some provisions of the draft ESIAS could result, if strictly implemented, in the practise of falconry being jeopardized without any benefit to the biological diversity. Falconers do not use exclusively birds of prey of indigenous species. They have been using non-indigenous species for centuries without any harm to natural systems, because (a) loss is a rare event especially with radio-tagging now routine, (b) survival to breed after loss, of two trained birds, of opposite sex at the same time and place is an event of vanishingly small probability. Were such an event to occur, the birds could readily be detected and removed before any risk of population growth by taxa with such a slow rate of population increase.

This was the basis for the exemption of falconry from Recommendation T-PVS (1997) 57, which is as justified today as it was in 1997. We therefore wish you to introduce in the text of the ESIAS a statement which would justify decisions exempting the use of birds of prey in falconry from the prohibitions contained in it.

We propose this as a paragraph after 5.23:

5.24 Non-indigenous birds of prey trained for falconry have been used for centuries without any harm to natural systems, as recognised by exemption in Recommendation T-PVS (1997) 57, and should be white listed. The International Association for Falconry and Conservation of Birds of Prey ([www.i-a-f.org](http://www.i-a-f.org)) provides a contact point for falconry issues.

in French

5.24 Des rapaces non indigènes dressés pour la fauconnerie ont été utilisés pendant des siècles sans causer de préjudice aux écosystèmes, ce fait a été reconnu par l'exemption figurant à la Recommandation T-PVS (1997) 57, il y a lieu de les inscrire dans la liste blanche. pour les questions relatives à la fauconnerie, l'Association pour la Fauconnerie et la Conservation des Oiseaux de Proie recommande de se référer à son site ([www.i-a-f.org](http://www.i-a-f.org))

In addition to this request, we allow ourselves to propose you the following amendments to the draft T-PVS (2002) 8 :

2.1 : replace “ ... groups recorded in their territory. Lists include ” by : “ ... groups recorded *in the wild* in their territory. Lists *could with advantage* include ”.

in French

2.1 “...groupes taxonomiques enregistrés sur leur territoire. Les listes doivent contenir...” by “...groupes taxonomiques enregistrés *dans la nature* sur leur territoire. Les listes *pourraient avantageusement* contenir..”

On page 8, paragraph 2, last line, replace “... customs, CITES) “ by “... customs, CITES *and veterinary authorities*.”

in French

Page 9, section 3, paragraph 2, last line : “...douanes, autorités de la CITES) “ by “...douanes, autorités de la CITES *et les autorités vétérinaires*”.

3.4 : replace “ ...and establishment of alien organisms ” by : “ ...and establishment of alien *invasive* organisms ”.

in French

3.4 : “ ...et l’implantation d’organismes exotiques ” by : “ ...et l’implantation d’organismes exotiques *envahissants* ”

3.19 : replace “...for unauthorised introductions, movements or holding of alien species ” by : “... for *illegal* introductions, movements or holding of alien *invasive* species ”

3.20 : replace “ ...or breeding of alien organisms ” by “ ...or breeding of alien *invasive* organisms ”  
in French

3.19 : “ ...non autorisés d’espèces exotiques ” by “ ...*illégaux* d’espèces exotiques *envahissantes* ”

3.20 : “ ...ou d’élevage d’organismes exotiques ” by “ ...ou d’élevage d’organismes exotiques *envahissants* ”.

5.6 : replace “ ... movement of biological material by tourists ” by : “ ... movement of *potentially invasive species* in biological material by tourists ”

in French

5.6 : replace “...le déplacement de matériel biologique par les touristes” by “...le déplacement par les touristes d’espèces *potentiellement envahissantes* dans du matériel biologique”

5.10 : replace “ ...prohibit alien species introductions ” by : “ ...prohibit alien *invasive* species *intentional* introductions ”

in French

5.10 : replace “ ... l’introduction d’espèces exotiques ” by : “ ...l’introduction *intentionnelle* d’espèces exotiques *envahissantes* ”

5.16 : replace “...release of specimens of alien species.” by “...release of specimens of alien *invasive* species.”

5.23 : replace “ ...keeping captive non-native birds ” by “ ...keeping non-native *invasive* birds ”

5.24 : replace “ ...capable of surviving in ” by “ ...capable of *becoming invasive* in ”

in French

5.16 : “ ... la libération de spécimens d’espèces exotiques” by “... la libération de spécimens d’espèces exotiques *envahissantes*”

5.23 : “ ...en captivité des oiseaux allochtones ” by “ ...en captivité des oiseaux allochtones *envahissants* ”

5.24 : “ ...capables de survivre dans l’environnement ” by “ ...capables de *devenir envahissants* dans l’environnement ”

6, 3rd . replace “ ...where alien species are kept ” by “ where alien *invasive* species are kept ”

in French

6, 3<sup>rd</sup> . “...détenant des espèces exotiques ” by “ ...détenant des espèces exotiques *envahissantes* ”

Justification :

The strategy deals with invasive alien species and not with all non-native species that would not become invasive.

7.5 : replace “ ...of hunting, shooting and ” by “ ...of hunting, shooting, *falconry* and ”

in French

7.5 : “ ...de chasse, de tir, et de ” by “ ...de chasse, de tir, *de fauconnerie* et de ”.

Replace : “ ...à des fins cynégétiques ” by “ *comme gibier* ”.

**White list:** there are no sections 4.17-4.25.

The following amendment is essential to avoid huge administrative overload from horticulture, silviculture and agriculture, as well as problems that will hinder cooperation from other groups:

5.11 **White list** replace “...following a risk assessment.” by “... following (a) *risk assessment* or (b) *decades of exposure to local or equivalent habitats without evidence of invasion*”.

**In French**

5.11 **Liste blanche** replace “...à la suite d’une évaluation des risques.” by “...à la suite (a) d’une évaluation des risques ou (b) *de décennies de présence dans l’écosystème ou dans des écosystèmes équivalents sans invasion avérée.*”

In general, we find the review exemplary in its thorough cover of all possible considerations. However, we note that implementation of all the proposed measures would require very considerable resources. Moreover, the chain of a species becoming invasive includes many links, including with a vertebrate example: export (permitted), transport (permitted), import (permitted), development of large captive stock (permitted, encouraged), release or loss of enough to establish (permitted, encouraged, failed to remove), invasion. It is not necessary to cut every link in the chain to prevent invasion. Indeed, with stakeholder agreement, it may be adequate to (i) prohibit deliberate release, (ii) discourage a large stock and (iii) ensure that any establishment will be immediately removed.

We feel that, rather than attempting every possible measure, it may be most practical to use step-wise implementation based on prioritisation. A review could be used to establish priorities, by assessing for each recent alien species invasion problem all the steps that would effectively have cut the chain, and whether 2-3 steps common to all could then be prioritised. Of course, differences between taxa might require different steps, for example for plants, vertebrates and invertebrates, or terrestrial and aquatic species.

Prioritisation among the many current proposals could lead to recommendation of a few simple measures likely to succeed. If there was then also be an annex of other measures to be considered when and where required, all the present hard and thorough review would have been useful, without practical and political difficulties from over-extensive and draconian measures.



## **17. IUCN (Chair of Invasive Species Specialist Group)**

On behalf of the Invasive Species Specialist Group of the IUCN Species Survival Commission I am delighted to have the opportunity to comment on the first draft of the “European Strategy on Invasive Alien Species”. I wish to congratulate you on the thoroughness of the strategy, and the "whole ecosystem" vision that clearly underpins it.

The approach that you take is comprehensive, covering prevention, early detection/rapid action, as well as mitigation, and covering all aspects, from public education to agency cooperation, legal requirements, etc. It is our firm belief that such comprehensiveness is indeed warranted in order to tackle the insidious biodiversity threats caused by invasive alien species. We also wish to commend you on the planned involvement of a wide range of stakeholders (industry and trade, transporters, retailers, resource managers, the public) in addition to government bodies and NGOs.

The ecological focus is rightly on bio-geographical boundaries rather than political ones: the explicit inclusion of prevention of unwanted introductions within a country rightly contains several recommendations. However, as these might be interpreted as focussing only on the movement within the country of species alien to that country, we would suggest clarifying that these can also apply to the movement within a country of species that are native to it. A species may well be native in one part of a country, and alien, even invasive, in another part of the same country (for example a species that is native on the mainland but not on an island, e.g. the hedgehog in Uist, Scotland).

The issue of ancient introductions is dealt with very sensibly. The approach to listing (black list, white list, grey list) is fully supported.

In summary: we fully and strongly support each and every of the recommendations contained in this draft strategy. We can only hope that other regions in the world may show similar vision and initiative in their dealing with the alien invasive species issue.

## 18. Plantlife

### Comments on European Strategy on Invasive Alien Species

Plantlife, January 2003

#### Introduction

1. Plantlife welcomes the opportunity to comment on the draft European Strategy on Invasive Alien Species. We believe that the strategy will make a significant contribution towards the international efforts to tackle the major ecological threats posed by non-native invasive species. Our views have been partly shaped by participation in the UK Government review of non-native species policy which is nearing completion. We would welcome the opportunity to be kept informed of developments and the process for taking the strategy forward.

2. Plantlife is the UK's only national membership charity dedicated exclusively to conserving all forms of wild plants and fungi in their natural habitats: the nation's champions of wild plants. It has 12,500 members and owns 22 nature reserves with a total land holding of 3,900 acres. Plantlife is 'Lead Partner' for 77 species under the Government's Biodiversity Initiative. Conservation of these is delivered through a recovery programme called *Back from the Brink*. The programme implements Species Action Plans for plants through survey, research, practical action and advice, in partnership with other key players. Plantlife involves its members as volunteers (called *Flora Guardians*) in delivering many aspects of this work; at present over 200 people contribute towards *Back from the Brink* in this way. Plantlife also acts as the secretariat for *Planta Europa*, the European network of organisations and individuals working for plant conservation and botanical research.

#### Existing obligations

3. The Strategy should perhaps acknowledge relevant obligations in the Global and European strategies for plant conservation.
4. Target 10 of the Global Strategy for Plant Conservation which was agreed at the Sixth Conference of the Parties to the Convention on Biological Diversity in the Hague in 2002. Target 10 states that by 2010 Parties should have "management plans in place for at least 100 major alien species that threaten plants, plant communities and associated habitats and ecosystems". This is a useful milestone and reinforces the need for a strategic response to the problem.
5. Targets 2.21 and 2.22 from the European Plant Conservation Strategy (Planta Europa and Council of Europe, 2002) again provide useful benchmarks for success in the fight against non-native invasive species.

#### Structure

6. We recommend that Section 3 regarding strengthening policy, legal and institutional frameworks should be the opening section. Without the leadership, direction and drive, there will not be the co-ordination to take forward the necessary accompanying measures.

#### Collecting, managing and sharing information

7. Species listing, research and monitoring should focus on priorities for action. It may be sensible to encourage Parties to start with a small number of their worst invaders and then move to others when progress has been made. Given the history of failure and inaction in this area it may make sense to try to set realistic targets which Parties can deliver on to demonstrate what can be achieved. We therefore recommend, in the first instance, piloting drafting and implementation of national containment/eradication plans for two invasive species (one aquatic and one terrestrial) and for a comprehensive containment/eradication strategy of invasive species for two regions (one predominantly containing dry and one with wet biotopes).
8. We would recommend that the IUCN's Species Survival Commission's Invasive Species Specialist Group is best placed to be the lead organisation for developing a co-ordinated European data framework. The Group has already made an impressive start in developing a useful web

information resource (<http://www.issg.org/>). The key challenge will be for Parties to feed information to the lead organisation.

### **Strengthening policy, legal and institutional frameworks**

9. This section is perhaps the most critical and we welcome most of the proposals. We do however believe that management planning will be an important tool in the fight against problem species.

### **Principles and tools**

10. We are in favour of risk analysis but suggest that it might not be as onerous as one might initially envisage. The existing knowledge about life strategies of certain genera of plants may enable us to predict invasive qualities with a degree of certainty. The involvement of botanic gardens in the risk assessment process on the horticultural trade could be an advantageous step to take.

### **Compliance and enforcement**

11. The development of codes of conduct/practices should be undertaken in a participatory fashion. Experience from the USA (specifically in Missouri, 2001) suggests that significant progress can be made when industry is involved in the process of developing codes. The important test of success is the degree of ownership of the code by industry.

### **Regional Co-operation**

12. Under 4.6 preference is given to native species in development assistance programmes. Given the increase knowledge in regional genetic heterogeneity within species, it may be sensible to encourage native species of local provenance.

### **Preventing unwanted introductions**

13. When discussing feasibility of trade restrictions, it may be worth mentioning the new measures adopted in South Africa to tackle non-native invasive species. An amendment (March 2001) of the Conservation of Agricultural Resources Act introduces new measures to address 198 non-native invasive species. Measures are targeted at three distinct categories: those plants that must be removed and destroyed immediately (category 1), plants that need a permit to be grown (category 2), and those that may not be planted, grown or sold, but whereby mature specimens of the species do not require removal (category 3).
14. Even if it will be difficult to introduce international trade restrictions, we would recommend the introduction of domestic bans on sale of known problem species.
15. Even though the EU is a single market, the precedent for introducing a ban on trade of species was established in articles 12 and 13 of the EC Habitats and Species Directive. Here trade in Annex IV species should be prohibited. Indeed Plantlife has recently established that the Commission believes that the UK is not in compliance with the Directive given that it has not introduced domestic legislation banning the trade in Annex IVb) plants.
16. We would be interested to learn how CITES can be used to minimise movement of non-native invasive species.

### **Mitigation of impacts**

17. We welcome the suggestion that response to problematic species should focus on eradication, containment or control. This is a useful way of determining objectives for individual species and these should be explicitly stated in any management plan for particular species.

### **Definitions**

18. We are slightly concerned about the interpretation of conservation priorities based upon strict definitions of native and alien. In the United Kingdom, for vascular plants, the New Atlas of the British and Irish Flora<sup>1</sup> includes classifications and maps of 2,412 taxa including 1,486 native

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<sup>1</sup> Preston, C.D., Pearman, D.A. and Dines, T.D. (2002) *New Atlas of the British and Irish Flora*. Oxford University Press for DEFRA and BSBI.

species, 44 'native-or-aliens', 158 archaeophytes, 575 neophytes, 40 casuals and 109 hybrids. An archaeophyte has been defined as an alien plant which became naturalised before 1500. Archaeophytes, which include many species associated with arable farming, are part of the United Kingdom's cultural and biodiversity heritage, and as such, we believe they should have a conservation status that is equivalent to that of native species. Indeed the UK currently includes ten arable archaeophytes on its species recovery list. There is a danger that by focusing solely on the conservation of native species, some which have been classified (rightly or wrongly) as long-established introductions, will be ignored by conservationists.

## **19. Confédération ornithologique mondiale – Commission ornithologique mondiale de la protection des espèces (COMPE) (Belgique) ; et Union Ornithologique belge**

En qualité de représentants sur le plan mondial des détenteurs et éleveurs d'oiseaux, nous ne pouvons nous empêcher d'exprimer notre inquiétude surtout en ce qui concerne les points 5.23 et 5.24.

Le fait qu'en outre la détention de certains oiseaux exotiques serait interdite dépasse les bornes. Malgré que nous nous opposons également à l'introduction d'espèces exotiques dans la nature, nos arguments ne nous permettent pas de nous déclarer d'accord avec une interdiction sur la détention, et ce pour les raisons suivantes :

- plus de cent ans déjà les oiseaux exotiques sont élevés en Europe. L'échappement accidentel d'un de ces oiseaux n'a encore jamais mené à la formation d'une population de ceux-ci ;
- les volières des éleveurs d'oiseaux sont toujours sécurisées par une écluse d'entrée en prévention des échappements ;
- la mise en liberté massive d'oiseaux exotiques est exclue, étant donné que les détenteurs d'oiseaux sont trop attachés à leurs animaux pour se livrer à de tels actes ;
- seules les introductions organisées ou massives peuvent créer une population d'une espèce d'oiseaux exotiques.

Les oiseaux élevés se retrouvant dans la nature n'ont quasiment aucune chance de survivre, vu qu'ils nécessitent généralement une alimentation spécifique avec laquelle ils se sont familiarisés par suite de leur vie dans la volière, chose à laquelle la nature ne peut satisfaire. Les dispositions que vous envisagez provoqueraient l'effet d'une gifle pour des milliers d'Européens dans leurs loisirs.

Nous nous permettons, par conséquent, de vous demander de vous interroger sur votre proposition avant de mettre en vigueur ces mesures inutiles et absurdes.