

Confor response to Defra and Welsh Government consultation on management measures for widely spread Invasive Alien Species (IAS) in England and Wales

Q1. Would you like your response to be confidential?

No

Q2. What is your name?

Eleanor Harris

Q3. What is your email address?

eleanor@confor.org.uk

Q4. Who do you represent?

Trade association: Confor

Q5. What geographic region do your responses relate to?

Both England and Wales

Q6. What are your views on the proposed aims for the management measures set out in Appendix A?

This answer relates to Grey squirrel, Muntjac deer, Chilean rhubarb, Giant hogweed, Himalayan balsam, American skunk cabbage.

Rhododendron ponticum should also be included in the list of species. RSPB Wales have consulted Confor on their major project on tackling invasive *R. ponticum* in woodland. This is widespread across the UK, particularly in the west (see <https://species.nbnatlas.org/species/NBNSYS0000003888>) and is a major threat to the ecological health of ancient and native woodland as well as being the main sporulating host for *P. ramorum*.

The aims set out in Appendix A seem adequate.

Q7. What are your views on the general management measures set out in Appendix B?

This answer relates to Grey squirrel, Muntjac deer, Chilean rhubarb, Giant hogweed, Himalayan balsam, American skunk cabbage. We suggest *Rhododendron ponticum* be added to the list.

The proposed measures are useful, but it is not clear what they will add to what is being done already. For example, the UK Squirrel Accord (<http://squirrelaccord.uk/>) already co-ordinates concerted action to control Grey squirrel, including professional and volunteer management, landowner and public awareness, research into control methods and reporting of population changes. The Deer Initiative similarly have the Deer Accord addressing Muntjac (<http://www.thedeerinitiative.co.uk/>)

Q8. Are there any additional actions you think should be used as general management measures for particular widely spread species?

This answer relates to Grey squirrel, Muntjac deer, Chilean rhubarb, Giant hogweed, Himalayan balsam, American skunk cabbage. We suggest *Rhododendron ponticum* be added to the list.

The biggest barrier to tackling the spread of woodland invasive species is the lack of funding for woodland management. Control of INNS represents a direct and ongoing expense for the landowner. Native woodland receives no BPS subsidy and, unless the woodland has been carefully and intensively managed for timber over many decades, yields little income. Apart from firewood sales and biomass, which can play a valuable role in rural heating, there are no benefits to landowners from actively managing woodland. As they receive no subsidies, there is little leverage to require them to undertake management activities; and penalising them for failing to tackle INNS would simply add to the burdens on land which is already often a liability, subject for example to flytipping or antisocial behaviour. This would simply push landowners towards degrading woodland until it is effectively deforested and can be reclassified as farmland, which is subsidised. For landowners to take care of woodlands, policies and funding structures must be put in place which make well-managed woodlands valuable to landowners.

This was highlighted in Confor's response to the Environmental Audit Committee consultation on INNS, <http://www.confor.org.uk/media/247420/confor-response-to-invasive-species-inquiry.pdf>.

Q9. Are there any actions that you think should not be used as part of a general management measure for a particular widely spread species?

No

Q10. What are your views on the proposed licensable management measures set out in Appendices C & D?

This answer relates to Grey squirrel and Muntjac deer.

In the case of these animals, the transport and keeping of live animals to prevent their release into the environment seems risky, costly, and questionably humane. Capture-release programmes, for example for contraception, and use of animals for human consumption could be important tools in tackling these species.

Q11. Are there any additional actions you think should be allowed as a licensable management measure for a particular widely spread species?

No

Q12. Are there any actions that you think should not be allowed to be used as part of a licensable management measure for a particular widely spread species?

No

Eleanor Harris

11 September 2019