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Consultation on the Invasive Non-native Species Framework Strategy.

Who we are and what we do.....

The Game Conservancy Trust aims for a thriving countryside rich in game and other wildlife. It uses science to promote game and wildlife management as an essential part of nature conservation.

Our response to your specific questions.....

Question 1. Yes. With a warming climate it is likely that more non native species will become naturalised within the UK. Some will have made their own way here and if benign will be accepted as new parts of the fauna and flora. Those that are brought in by man should be treated as alien unless they are properly managed and are non-invasive.

Question 2. Yes, we agree with these recommendations.

Question 3. There are references in the 2003 report of need to react in a timely manner, yet none of the recommendations properly reflect this. We think that Recommendation 5 should include in a statute that the co-ordinating body to develop policies and plans within a legal time-frame (say 12 months). Too often policies and actions have only been developed years after an invasive alien has been indentified.

Question 4. Yes. It would be naïve, however, to expect consensus where species need to be controlled.

Question 5. Yes

Question 6. No.

Question 7. No.

Question 8. Yes, we agree with this strategy.

Question 9. No.

Question 10. Yes.

Question 11. No.

Question 12. No. The scope of the strategy cannot possible address all the nonnative fauna and flora that have come here in the past. It should confine itself solely to assessing the risks from new introductions and tackling the invasive species we have already got.

Question 13. Yes. The strategy should include an assessment of new "reintroductions" (accidental or otherwise) of species that have been mostly absent from these islands since say 1600. There are proper IUCN guidelines for re-introductions and unless these are followed cavalier re-introductions should be treated as introduced aliens. Wild boar and beavers are recent cases in point.

Question 14. Yes. It does, however, seem cumbersome. It will need to demonstrate that it can act quickly and decisively.

Question 15. No.

Question 16. No

Question 17. No.

Question 18. Yes.

Question 19. No.

Question 20. No.

Question 21. Yes, but with the added proviso that re-introductions of natives into parts of their range where they have been absent for hundreds of years should be treated in the same way.

Question 22. Yes.

Question 23. No.

Question 24. We have 20,000 members many of whom are large and small landowners. They often look to us for guidance on wildlife management on their properties. We would be only too pleased to advocate to them sensible measures in dealing with invasive species.

Question 25. No.

Question 26. Yes – and action should be timely as well. Wildlife carries on reproducing while people sit around and talk

Question 27. Yes – particularly the need for rapid response locally - something which has been lacking in relation to signal crayfish.

Question 28. No.

Question 29. Yes. In appropriate fields we can develop new expertise to control invasive species – particularly where they are mammals or birds.

Question 30. No.

Question 31. Yes. This is a good basic principle.

Question 32. Yes.

Question 33. No.

Question 34. Yes. We have a research expertise in developing vertebrate pest control.

Question 35. No.

Question 36. Yes.

Question 37. No.

Question 38. No.

Question 39. No.

Question 40. That will depend on entirely on what is proposed. Our wildlife legislation is over complex as it is. Adding further layers would not be a good idea.

Question 41. No.

Question 42. We always comment constructively on proposed legislative changes.

Question 43. No.

Question 44. Yes.

Question 45. No.

Question 46. Yes. We employ many field biologists who can participate in research programmes on invasive species. We do not always have the funds for such programmes and Defra would need to finance much of this work.

Question 47. No.

Question 48. Yes.

Question 49. No.

Question 50. Perhaps some – our staff regularly attend research conferences at home and abroad.

Question 51. No.

Question 52. No.

Question 53. Yes.

Question 54. Yes.

Question 55. No.

Question 56. Yes. We need to encompass unauthorised re-introductions that have not gone through thorough appraisal and testing against IUCN guidelines.

Dr Stephen Tapper 23rd May 2007