

## Members' Library Service Request Form

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Document Title	Response to Call for Evidence on the Control and Impact of Invasive Non-Native Species

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**REPORT TO:** Members' Library Service

**MEETING DATE:**

**BY:** Executive Director of Place

**SUBJECT:** Response to Call for Evidence on the Control and Impact of Invasive Non-Native Species

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## **1 PURPOSE**

- 1.1 To note the submission of the Council's response to the Call for Evidence from Environmental Standards Scotland on the control and impact of invasive non-native species.

## **2 RECOMMENDATIONS**

- 2.1 Members are asked to note the contents of this report and the Council's response to the Call for Evidence from Environmental Standards Scotland, which is set out in Appendix 1 of this report.

## **3 BACKGROUND**

### ***Invasive Non-Native Species***

- 3.1 An 'invasive non-native species' (INNS) is any non-native animal or plant that has the ability to spread causing damage to the environment, the economy, our health, or the way we live<sup>1</sup>. The number of INNS in Britain continues to rise, including in East Lothian.
- 3.2 INNS are one of the top five drivers of global biodiversity loss. They threaten our ability to meet wider environmental targets and to respond to the Climate and Nature Emergencies. INNS cost the Great Britain economy nearly £1.9 billion annually in direct costs<sup>1</sup>, and pose a significant and increasing threat to the natural environment.

### ***The Call for Evidence from Environmental Standards Scotland***

- 3.3 Environmental Standards Scotland (ESS) invited interested parties including East Lothian Council to submit evidence to support a review of

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<sup>1</sup> Source: [The Great Britain Invasive Non-Native Species Strategy 2023 to 2030 \(nonnativespecies.org\)](https://www.nonnativespecies.org)

the control and impact of invasive non-native species. This is part of ESS' ongoing scrutiny of the effectiveness of environmental law. The Call for Evidence, which closed on 11 July 2024, can be viewed at:

<https://environmentalstandards.scot/our-work/our-analytical-work/call-for-evidence-control-and-impact-of-invasive-non-native-species/>

- 3.4 ESS' Call for Evidence sought to gather insights and information on the control and impact of these species in Scotland, to better understand the challenges facing the control of INNS in Scotland, and if there are barriers in place that prevent the successful delivery of management targets. The Call also sought to gather insights into the impact of INNS, particularly regarding existing data gaps.

***The Council's response to the Call for Evidence***

- 3.5 In general, the Council's response recognises that there is a level of public understanding and awareness about INNS and their impacts but that aspects of tackling INNS need to be improved.

- 3.6 The Council's response includes the following:

***Control of INNS including awareness, management strategies/policy:***

- Further clarification is needed of the identification of INNS and their impacts, and how to appropriately control INNS so that other (native) species are not impacted;
- Management of INNS would be more effective if it was made a higher priority by national government and government agencies, and presented to others (including Local Authorities) with clear prioritised messaging plus the necessary ring-fenced funding;
- The most impactful INNS awareness-raising campaigns have been locally led, such as that undertaken in East Lothian by East Lothian Council Countryside Ranger Service. However, this would be more effective if linked to greater awareness-raising through national campaigns;
- In East Lothian, we have an excellent volunteer organisation, East Lothian Countryside Volunteers, who train volunteer 'spotters' and liaise with local farmers and landowners to tackle INNS effectively along two rivers in East Lothian;
- There are gaps in the management efforts targeting particular INNS species, e.g. the pathogen Ash Dieback tree disease. Without any targeted funding from the Scottish Government, Scottish Local Authorities are very restricted in our ability to tackle Ash Dieback to reduce the risk and properly fund landscape scale restoration;
- As a Local Authority, we need clearer INNS guidance and an up-to-date Code of Practice. INNS should be given a higher profile by national government, including a focus on how INNS will impact the key aspects of public health, the economy and infrastructure.

***Impact of INNS including understanding of impacts, data gaps:***

- The key environmental impacts of INNS are the loss of native species, and degradation of priority habitats. A current case in East Lothian is

the control of Common Cord Grass (*Spartina anglica*) in John Muir Country Park. ELC Countryside Ranger Service worked with RSPB to develop and implement the local response to this INNS that has appeared at John Muir Country Park;

- Those undertaking work on INNS must have a well-rounded knowledge of conservation and habitat management as a whole and must take a holistic view of the locality including site sensitivities and ensuring permissions from relevant governing bodies are in place. This local knowledge is a key strength of ELC Countryside Service;
- There is insufficient evidence/data on the combined or cumulative effects of INNS and climate change. Climate change (including changing weather patterns) is having an impact on the types of species and their distribution, growth rate and spread. For all INNS, there is a need to understand the rate of spread based on changes in climate and weather patterns.

#### **4 POLICY IMPLICATIONS**

- 4.1 The Council declared a Nature Emergency in October 2023. Tackling invasive non-native species is one key aspect of the Council's nature emergency response to protect biodiversity in East Lothian, and will be incorporated into the updated East Lothian Biodiversity Action Plan (currently in preparation).
- 4.2 At this stage the responses submitted to Environmental Standards Scotland will inform their understanding of the challenges posed by these species and help inform their future work. If this results in national legislative or policy change in future we will take cognisance of this.

#### **5 INTEGRATED IMPACT ASSESSMENT**

- 5.1 This report is not applicable to the wellbeing of equalities groups and an Integrated Impact Assessment is not required.

#### **6 RESOURCE IMPLICATIONS**

- 6.1 Financial – There are no resource implications directly arising from this Call for Evidence.
- 6.2 Personnel – None
- 6.3 Other – None

#### **7 BACKGROUND PAPERS**

- 7.1 The Council's response to the Call for Evidence from Environmental Standards Scotland on the control and impact of invasive non-native species is set out in Appendix 1 of this report.

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<b>DATE</b>	25 September 2024

## **Appendix 1: East Lothian Council response submitted to the Call for Evidence from Environmental Standards Scotland on the control and impact of invasive non-native species (INNS)**

Call for Evidence questions and East Lothian Council responses:

### **Control of INNS**

**Terminology and awareness of invasive non-native species:**

**a) Is the terminology used to describe invasive non-native species, as understood by duty bearers and the public, sufficiently clear? Is further clarification needed?**

*ELC response:* From our perspective as a Local Authority, the terminology is understood within Local Authority departments that have responsibility for invasive non-native species (INNS), however other departments etc. do not have the same level of understanding. In our experience, the public are generally aware of higher-profile invasive non-native species, which have an impact on health and property values, e.g. Giant Hogweed, Japanese Knotweed. Further clarification is needed of the identification of species, the impact of species, and how to appropriately control INNS so that other (native) species are not impacted.

**b) Do you support the current criteria used by Scottish public bodies to define an invasive species? If not, what improvements are needed? What level of impact must a species have to be considered invasive?**

*ELC response:* The definition given for the purposes of this Call for Evidence, i.e. “an invasive non-native species is defined as ‘a species intentionally or unintentionally introduced outside its native range by human actions that has the ability to spread causing damage to the environment, the economy, our health, or the way we live’” is misleading, as INNS are not always introduced by human actions: they can be introduced or spread by biological transportation / biological factors, e.g. via birds or fish; or by physical factors such as tidal currents.

**c) How effective are current awareness campaigns and public engagement efforts in educating the public about the risks and impacts associated with invasive non-native species? Are there any notable gaps in public understanding regarding INNS?**

*ELC response:* In our view, the most impactful awareness raising campaigns have been locally led rather than national campaigns. For example, here in East Lothian, the East Lothian Council Countryside Ranger Service lead on local promotion and awareness-raising, for example through their attendance at the Haddington Agricultural Show.

Local signage at key locations is effective at raising awareness locally (e.g. we are aware of a good example on Lindisfarne in Northumberland). Ranger teams are doing the best they can with limited staff capacity, and we believe there is value in “think global, act local” in relation to tackling INNS. However, this would be more effective if linked to greater awareness-raising through national campaigns.

NNSS (GB Non-Native Species Secretariat, [www.nonnativespecies.org](http://www.nonnativespecies.org)) provided a very helpful and user-friendly *handout* (identification chart) some years ago, which was circulated to Ranger Services including ELC Countryside Ranger Service, and we passed this information out to our local volunteers and wider network. However, in general, national campaigns do not appear to have been hugely effective, with many people being unaware of their responsibilities in the outdoors in relation to INNS. Social media is only part of the solution.

### **Management strategies:**

#### **d) How well-defined and understood are the roles for duty bearers in managing INNS?**

*ELC response:* From our perspective as a Local Authority, our role as a duty bearer is well-defined and understood. However, we are limited by the funding and capacity that we have available for this.

#### **e) How effective are the current management strategies at addressing INNS? How could management of INNS be improved?**

*ELC response:* The Great Britain Invasive Non-Native Species Strategy, 2023 to 2030, appears to be effective. As a Local Authority we are aware of our role, what INNS species we have and what we are required to do. It should be noted however that national INNS strategies are at odds with Glyphosate reduction strategies that many Local Authorities are currently taking forward, although we are aware of a level of understanding among the public that INNS do require alternative management that may include the use of Glyphosate to be effective. Management of INNS could be improved if it was made a higher priority by national government and government agencies, and presented by national bodies to others (including Local Authorities) as a high priority with ring-fenced funding allocation. If clear prioritised messaging plus the necessary funding is provided by national bodies then INNS management will be more effective. In East Lothian, we have an excellent volunteer organisation, East Lothian Countryside Volunteers (ELCV [www.elcv.org.uk](http://www.elcv.org.uk)), who train volunteer 'spotters' in INNS and liaise with local landowners to tackle INNS. Their local links to farmers and landowners make this so effective in East Lothian. The national strategy must have clear links to landowner / land manager organisations, e.g. National Farmers' Union Scotland (NFUS), Scottish Land & Estates, as these have a key role to play. Private landowners must be involved for any national strategy to be effective and successful.

As set out above, Ranger Services can deliver the education and awareness-raising locally and are already underway with this.

#### **f) Is the current allocation of effort and resources across the categories of (i) prevention, (ii) early detection and rapid response and (iii) long-term management and control appropriate in effectively managing INNS in Scotland? What improvements are needed?**

*ELC response:* The current allocation of effort and resources is limited across all of these categories. Responses to tackling INNS seem reactionary and heavily reliant on the input of experts who have knowledge of specific species. To be more effective, the profile must be raised nationally and ring-fenced funding needs to be provided, as currently INNS management is competing with other conflicting demands and restricted funds.

**g) Are there any gaps in the management efforts targeting particular INNS species, such as marine species, freshwater species and pathogens?**

*ELC response:* Pathogens – Ash Dieback tree disease is a major issue impacting the UK including Scotland, with The Tree Council estimating that at least 50%–75% of Scotland’s ~11 million mature ash trees may die over the next two decades – see <https://treecouncil.org.uk/guidance-resources/ash-dieback-action-plan-toolkit-for-scotland/>. In East Lothian, as a Local Authority we are doing our best to tackle Ash Dieback diseased trees within the current limited funding resource we have available. Without any targeted funding from the Scottish Government, Scottish Local Authorities are very restricted in our ability to tackle Ash Dieback in order to reduce the risk and properly fund landscape scale restoration following diseased tree removal.

In general, it would be helpful to be made aware of what scientific research is currently underway into specific species and their impact on the environment. Are there studies underway into either different management or eradication of these invasive species? Is there a definitive list of the INNS that cause damage?

The website of the GB Non-Native Species Secretariat [www.nonnativespecies.org](http://www.nonnativespecies.org) is a very valuable and useful resource which should be more widely promoted as a central, coordinated web-based hub for information on INNS and best practice examples of how to manage specific species.

**Legislation/policy:**

**h) Is the existing legislation used/enforced? What challenges exist in application and enforcement?**

*ELC response:* (Information not known)

**i) Are national policies in Scotland for INNS coherent across sectors (e.g. forestry, agriculture)? Is there efficient co-ordination among sectors on INNS control?**

*ELC response:* (Information not known)

**j) How does the approach in Scotland compare internationally? Is Scotland keeping pace with the EU and the global community on these issues?**

*ELC response:* (Information not known)

**k) What improvements are needed in current legislative/policy frameworks to enhance the prevention, detection and management of INNS?**

*ELC response:* From the perspective of a Local Authority, we need clearer guidance and an up-to-date Code of Practice. We understand that the government has set up an action group, but this issue needs to be given a higher profile by national government. A focus on how INNS will impact the key aspects of public health, the economy and infrastructure, will raise the profile of INNS.

**Impact of INNS**

## Understanding of impacts:

**a) What do you consider are the key environmental impacts of INNS in Scotland across freshwater, marine and terrestrial species? Please provide specific examples with evidence where possible.**

*ELC response:* The key environmental impacts of INNS are the loss of native species, and degradation of priority habitats.

Through funds such as NatureScot's Nature Restoration Fund available to Local Authorities, and personal communications with NGO representatives, we can share good practice. A current case in East Lothian is the control of Common Cord Grass (*Spartina anglica*) in John Muir Country Park. Here the Cord Grass has colonised the River Tyne estuary, and through communication between the ELC Ranger Service and colleagues at RSPB, who have completed much good work on the control of *Spartina* on their own reserves, we have been able to develop the local response to this non-native. In effect *Spartina* is a new species in East Lothian we are having to deal with; we need more information and guidance on how best to tackle this species.

**b) Are there specific species for which more impact information is needed? How could further information be gathered on these species?**

*ELC response:* See above example – Common Cord Grass (*Spartina anglica*). There are over 3000 non-native species in the UK (according to *The Non-Native Species Information Portal*) – it would be helpful if these were prioritised (e.g. a 'RAG' rating- red/amber/green) to enable focus on the highest priority species.

**c) Is there sufficient evidence on the potential cumulative impacts or risks from the combined effects of INNS and pressures such as climate change and other anthropogenic activities?**

*ELC response:* No – there is not sufficient evidence on the combined or cumulative effects of INNS and climate change, etc. Climate change in particular (including changing weather patterns) is having an impact on the types of species and their distribution, growth rate and spread.

## Data gaps:

**d) What are the key data gaps in understanding the impact of INNS in Scotland?**

*ELC response:* As above – there is insufficient data on the combined or cumulative effects of INNS and climate change / changing weather patterns on the types of species and their distribution, growth rate and spread. For all invasive non-native species, there is a need to understand the rate of spread based on changes in the climate and weather patterns.

**e) How can these gaps be addressed, and what are the key challenges/barriers to filling these gaps?**

*ELC response:* These gaps can be addressed by: coordination of research and response; further investment in research; profiling of growth rates and spread of INNS; prioritising key species particularly those which cause the most damage. The challenges with this are that focusing on eliminating one INNS species could enable other INNS species to then take over and dominate – for example completely removing Giant Hogweed from an area which it dominated has left a

gap site which other species are quick to colonise, including other INNS species.

**f) How accessible and comprehensive are publicly available databases on known and potential invasive non-native species? What improvements could be made?**

*ELC response:* The National Biodiversity Network Gateway database is only as good as the information submitted into it. The databases are not publicly accessible. The databases could be improved by being more targeted, but then the data would be skewed if the focus is placed on one particular species. The Wildlife Information Centre (TWIC) is very important in gathering and collating records for the local region.

**g) What challenges and opportunities exist in making more information publicly available and how might they be addressed?**

*ELC response:* Challenges: The information is limited and not well promoted. Site sensitivities around endangered native species are a concern. For example, it may be possible to eliminate the INNS from a river but there may be sensitive protected native species there, so appropriate measures need to be taken for the area as a whole rather than for an individual species. Opportunities: If putting these measures in place to tackle INNS, there would be a more coordinated, efficient and impactful response to INNS. Those undertaking the work on INNS must have a well-rounded knowledge of conservation and habitat management as a whole and must take a holistic view of the locality including site sensitivities. This emphasises the importance of local knowledge and undertaking this work at local level. This is a key strength of East Lothian Council Countryside Service: knowing our countryside and coastal sites well, including what works best in these specific sites with their mosaic of habitats; working in partnership.