

Call For Evidence – Environmental Standards Scotland Terminology and awareness of invasive non-native species

The Property Care Association (PCA) is the UK's leading representative organisation for the protection of buildings. Championing high standards of professionalism, providing guidance, expertise, and advice for homeowners and professionals championing high standards of professionalism, providing guidance, expertise, and advice for homeowners and professionals.

Our skilled and audited membership operates across domestic, commercial and civil sectors in the structural repair, structural waterproofing, timber preservation, damp protection, flood remediation and invasive weed control industries.

With strict membership criteria, comprehensive training programmes and a wealth of information for professionals and homeowners, the PCA and its members help protect the integrity and comfort of buildings in new build and refurbishment projects whilst also being a reliable source of guidance and expertise.

As the PCA represents contractors in the invasive plants sector, our responses solely focus on Invasive Non-Native Plants (INNP).

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

The terminology to describe invasive non-native species is clear; however, we recommend efforts to encourage the term "invasive non-native plant" (INNP) where relevant. This distinction will help differentiate the issues related to fauna and flora, ensuring that the specific challenges associated with invasive plants are appropriately addressed. Additionally, this would aid in a clearer understanding within invasive non-native species surveys as typically surveys conducted are specific to flora or fauna, rather than both.

To ensure clear communication and avoid confusion for duty bearers and those outside the academic community, we recommend avoiding the use of scientific names, such as *Rhododendron ponticum*, and specialised terms, like "Ponto-Caspian". Simplifying language and using common names or plain language will make the information more accessible and easier to understand, enhancing the effectiveness of the messaging.

2. 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?

Awareness campaigns have been successful for invasive non-native plants, including the National Trust for Scotland's campaign for Rhododendron. The [Spread of Invasive Species into Scotland \(October 2023\)](#) study identified new potential threats, yet awareness of it is not widespread. Follow-up campaigns should focus on effective control methods for identified invasive non-native species rather than on remediation strategies after they have taken hold. Having a pre-agreed consultation period for identifying successful remediation methods from abroad can help identify best practices before these species enter the country. This proactive approach provides a better framework for Local Action Groups (LAGs), the general public who must be actively involved in invasive non-native species identification and professional accredited contractors, to reduce the risk of spread and environmental problems.

There is a need for a shift in culture amongst field botanists and naturalists to draw attention to alert or potentially alert species: who to report findings to and instilling a responsibility to respond. This applies to gardeners too, including where fly-tipping has taken place. Everyone must be part of the solution to identify invasive non-native plants.

3. How well-defined and understood are the roles for duty bearers in managing INNS?

The definition is well defined and understood to be as the "polluter pays" but this does not work in practice where there is no landowner or responsible party. The roles of duty bearers are often unclear, which leads to knowledge gaps and a lack of legislative understanding.

A common example is the handling of invasive non-native plants during housing development. While the removal of Japanese Knotweed (*Reynoutria japonica*) is typically prioritised, other invasive non-native plants are often left unmanaged or poorly controlled. This poor management leads to further spread of lesser-known invasive non-native plants. Better education and clearer guidelines are required for duty bearers to ensure comprehensive and effective management of all invasive species on construction sites.

4. How effective are the current management strategies at addressing INNS? How could management of INNS be improved?

A need for better co-ordination and a joined-up approach is needed at the local/landscape scale. For example, local authorities or catchments areas are unaware of what different departments are doing within the same organisation.

Further consultation with professional membership organisations is crucial. The [Property Care Association \(PCA\)](#), has nearly 100 members specialising in the control of invasive non-native plants, along with the [Chartered Institute of Ecology and Environmental Management \(CIEEM\)](#) and the [British Ecological Society \(BES\)](#), which have expertise in managing other invasive non-native species, can provide valuable insights. Working with these organisations will provide expertise and experience which can help address knowledge gaps in current management strategies. Additionally ecological consultants or invasive non-native plant experts could provide a vital tool in contributing records of invasive non-native species.

There is a need for more comprehensive training in management strategies and establishing training programmes in collaboration with these professional organisations is essential. Funding for relevant training will also encourage leaders within Local Action Groups (LAGs) to undertake specialist courses to better understand legislation, biosecurity measures, and effective remediation strategies.

A comprehensive invasive non-native species code of practice should be considered or developed, once again utilising the aforementioned membership organisations to provide expertise. We have recently reviewed our [Code of practice for Japanese Knotweed](#) (November 2023) and will be releasing a new terrestrial invasive non-native plant Code of Practice in August 2024.

5. 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?

Experts specialising in invasive non-native plants should be leading the effort in implementing rapid response strategies, yet they are often not consulted at the appropriate time. Providing fixed-term grants for managing invasive species is unsustainable and risks wasting valuable financial resources, especially if funding is provided to a LAG which does not comply with current best practices or is not overseen by an INNP professional. Therefore, it is crucial to consistently engage INNP expert contractors to ensure ongoing professional input and effective management practices.

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

There are other significant knowledge gaps, such as the management of invasive non-native brambles and native invasive species.

7. Is the existing legislation used/enforced? What challenges exist in application and enforcement?

Although the Wildlife and Natural Environment Act (WANE) appears robust, enforcement against invasive non-native plants is lacking. It is very hard to track where INNPs have spread from and as a result, there may be an incentive to avoid dealing with an issue, even though legally required to. For the dutyholder this may mean a short-term financial gain, but this can lead to long-term financial, social and environmental issues.

There is a need for campaigns aimed at dutyholders and the public, to clarify responsibility for charging or arresting offenders who breach legislation, ensuring there are effective measures to make polluters accountable and monitoring the management of existing breaches.

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

There is a lack of coordination among sectors when integrating resources to ensure comprehensive, cost-effective, and sustainable control of invasive non-native species (INNS). We would like to see government working closely with membership bodies, including specialist contractors, to develop both strategy and plans for local management. A coordinated approach will lead to better outcomes for all.

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

Scotland demonstrates a highly proactive stance in managing invasive non-native species, keeping pace with both EU and global standards. The Wildlife and Natural Environment (WANE) Act is particularly robust, enabling the control of any non-native species that could pose environmental risks, rather than relying solely on a legislative list of specific species. This flexible approach allows for more comprehensive and effective management of potential threats to Scotland's natural environment.

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

Consultation with professional membership organisations such as the Property Care Association (PCA), Chartered Institute of Ecology and Environmental Management (CIEEM), and the British Ecological Society (BES) is essential to grasp the grassroots application of legislative and policy frameworks. Their expertise and field experience can significantly enhance the development and implementation of effective management strategies for invasive non-native species. By leveraging the knowledge of these organisations and their members, legislative measures can be developed to be practical, efficient, and grounded in real-world application.

11. 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.

Giant Hogweed's impact on fishing stems from its invasive nature along riverbanks, where it outcompetes native plants, alters habitats crucial for fish, and poses health risks to anglers due to its toxic sap.

12. Are there specific species for which more impact information is needed? How could further information be gathered on these species?

Experts who can provide valuable insights and cases studies would help to ascertain impact information, for example, consulting with Deutsche Bahn (German Rail) on their methods for managing Tree of Heaven (*Ailanthus altissima*) can provide valuable insights into effective control strategies. Additionally, collaboration with Charles Hughes from the Canal and Rivers Trust can offer expertise in identifying and remedying Floating Pennywort (*Hydrocotyle ranunculoides*). Both invasive non-native plants have been highlighted in the Spread of Invasive Species into Scotland (October 2023) study.

13. 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?

There is evidence; however, this needs to be simplified to ensure duty bearers understand their roles and the opportunity for increased spread of invasive non-native species due to climate change and human interaction. This is particularly relevant in the construction sector where disturbed soil can facilitate the spread of invasive non-native plants. Clarifying responsibilities and illustrating the consequences of inaction will help duty bearers grasp the significance of their role in preventing the spread of these species, however this should be accompanied by legislation to ensure appropriate action can be taken and limiting environmental impacts.

Additionally, there is a need to identify potential INNPs, not yet spreading or in the early phases of their spread, for example certain invasive bamboo species and coastal species including Hottentot Fig (*Carpobrotus edulis*).

14. What are the key data gaps in understanding the impact of INNS in Scotland?

Enhanced networking between Local Environment Records Centres (LERCs) in England and Scotland could facilitate the identification of species suitable for alert lists. Scottish LERCs should implement an alert system to promptly identify these species and their initial locations. This information should be communicated to key stakeholders to enable an efficient and coordinated rapid response.

15. How can these gaps be addressed, and what are the key challenges/barriers to filling these gaps?

Improving resources for Local Environment Records Centres (LERCs) and securing funding to establish an alert system would support a centralised understanding and allow the better transfer of knowledge.

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

The [Non-Native Species Secretariat](#) (NNSS) provide free access to invasive non-native species data for Local Environment Records Centres (LERCs) and identification sheets.

We suggest establishing working groups and utilising available training programmes focused on controlling invasive non-native species. These programmes are offered by not-for-profit membership bodies including the [Property Care Association](#) (PCA), the [Chartered Institute of Ecology and Environmental Management](#) (CIEEM), and the [British Ecological Society](#) (BES). Training programmes should be funded for Local Action Groups (LAGs) to support and upskill voluntary groups.

To enhance the effectiveness of applications like [INNS Mapper](#), further campaigns should be launched to support and promote their use. These applications offer valuable opportunities for both the public and professionals to track and record invasive non-native species. Increasing awareness and usage of such databases will lead to a higher volume of data records, can improve resources allocation and overall better strategic planning for invasive non-native species control.

17. What challenges and opportunities exist in making more information publicly available and how might they be addressed?

The availability of records from Local Environment Records (LERCs) is limited due to inadequate recognition of their value and insufficient funding. Establishing and publicising areas designated as "xx species free," such as being Giant Hogweed free within a district or county catchment, can instil pride in the local community. This pride can encourage prompt reporting of any reappearance of these species.

18. In addition to the above, you are welcome to provide any other information you consider is relevant to this Call for Evidence:

The [Chartered Institute of Ecology and Environmental Management](#) (CIEEM) has developed competency standards for managing invasive non-native plants (terrestrial and freshwater), which could be applicable across various stakeholder groups.

We have established a [Code of Practice for Japanese Knotweed](#) and will be releasing a new Invasive Non-Native Plant Code of Practice in August 2024. In addition, we provide training and certification programmes and an audited membership base. Our list of Trustmark accredited members is available on our website for homeowners or dutyholders to contact for practical management support.