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## CEEweb Comments on the Stakeholder Consultation on EU Strategy on Invasive Alien Species

CEEweb for Biodiversity<sup>1</sup> welcomes the opportunity to give input to the Stakeholder Consultation on EU Strategy on Invasive Alien Species. We especially welcome the intent of the Commission to introduce a comprehensive, dedicated legal framework to take action against the most harmful IAS, and that the EU strategy on IAS will be a component of the post 2010 biodiversity policy.

After collecting recommendations from several Central- and East-European nature conservation NGOs, our demands for the EU Strategy on Invasive Alien Species are the following:

### 1. Clear definition

Clarification of what is precisely understood by "alien species" is important. The CBD definitions are:

*A native species is one which naturally exists at a given location or in a particular ecosystem, i.e. it has not been moved there by humans (CBD Technical Series No. 7). The term native species is synonymous with indigenous species (FRA 2005).*

*Alien species is a species, subspecies or lower taxon, introduced outside its natural past or present distribution; includes any part, gametes, seeds, eggs, or propagules of such species that might survive and subsequently reproduce. Invasive alien species is an alien species whose introduction and/or spread threaten biological diversity (annex to CBD Decision VI/23).*

The CBD definition has a different wording than art 22b of the Habitats Directive, which applies to the "*species not native to the MS territory*". The consequence is that according to the CBD a species can be alien in one part of a country, if it is not naturally existing there, even if it is native in another part of the same country. But such species populations, "alien" according to the CBD definition, would not be in the scope of Art 22b of the Habitats Directive.

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<sup>1</sup> CEEweb for Biodiversity is a network of 64 non-governmental organizations in the Central and Eastern European region. Our mission is the conservation of biodiversity through the promotion of sustainable development.

In Council Regulation 708/2007 for aquatic species, the definition of alien species is different yet again – being narrowed by the words "*.. and outside the area of its natural dispersal potential*".

CEEweb therefore proposes for European IAS policy:

- one common and clear understanding of "alien species", using the formula as defined in CBD executive papers: 'each species outside its natural range'
- elaborating something similar to Council Regulation 708/2007 also for agriculture and forestry
- Art 22 of Habitat Directive should be used more intensively (binding EC interpretation guidelines + EC legal actions for particular cases)
- Clear differentiation of IAS from those native species naturally enlarging their area due to climate change

## 2. Prevention at the level of drivers

IAS are certainly a major agent in biodiversity loss, but IAS are not the drivers, they are a pressure – **the trade, transport and tourism movements which spread IAS are the cause which must be tackled**. Therefore – besides tackling the most dangerous immediate effects of IAS - any European strategy or action plan on IAS should also include actions that target the underlying drivers which indirectly lead to the spread of IAS.

CEEweb therefore proposes for European IAS policy:

- **Involving relevant DGs, look at possibilities of stopping trade and transport from introducing new IAS**. CEEweb supports the system of a "White list or positive list", also noting that with any kind of measure, it is very hard to prevent IAS spread with a magnitude of trade and transport the EU currently has. Therefore, the real driver-tackling solution would be to shift the ratio between goods produced within the EU and those imported, towards more domestic production and less import. As long-distance mass trade has several harmful effects on the environment which are not reflected in the prices, internalizing these externalities would enhance this shift.
- At the international level, the EU negotiators in the WTO ought to be instructed to **put the IAS-trade link on the agenda of WTO debates** (Doha Round etc); similar instructions should be given for EU representatives in other world fora.
- **EU should take global responsibility** (according to EU Biodiversity Strategy post-2010 subtarget 6): the EU ought to assess where and how it

is an exporter of IAS to other countries, and take remedial action with the affected countries.

### 3. Enhancing ecological resilience at landscape level for prevention as well as control of established IASs

Concerning how to deal with IAS already established, all environmental policy should be designed in such a way that the 'cure is not worse than the illness', avoiding drastic and large-scale interventions with heavy machinery (reasons: carbon emission, habitat degradation, soil compaction etc.), and avoid extended use of toxic chemicals (reasons: unwanted additional negative effects on the species community). Note: it happens often enough that eradicating one IAS at a site means that another IAS, suppressed by the first, suddenly proliferates.

CEEweb suggests taking a holistic view and, within any future EU strategy or instrument, making an 'ecological cost-benefit assessment' of actions to combat already established IAS.

We recommend integrating the prevention of IAS into **land use planning**, which, while considered to be primarily a local issue, may have far-reaching consequences at EU level.

CEEweb therefore proposes for European IAS policy:

- In most cases, habitats in healthy, natural state are much more resilient to IASs than fragmented and/or disturbed sites. Each disturbance in an ecosystem (caused by factors like forest management, tourism etc.) may open a gateway for local invasion – this ought to be taken into account by land users and managers, and the **least possible disturbance of natural ecosystems, as well as restoration of degraded ecosystems** should be targeted.
- There are several good examples for management schemes of specific habitat types, which enhance their resistance to IASs and, at the same time, ensure good conservation status and sustainable use. These schemes are often specific to habitat types and regions, and cannot be generalized. Still, we believe that the **collection and sharing of these good practices, as well as supporting their more widespread implementation** is the best way of both preventing and eradicating IASs.  
An example for this comes from local farmers in Rakamaz (Tisza river basin, Hungary) who – by changing grazing regimes coupled to mowing and manual destruction - successfully rolled back *Amorpha fruticosa*, a species with heavy invasion on Central- and East-European floodplains.  
([http://www.ceeweb.org/workinggroups/natura2000/resources/Bestpractice/HUN\\_2\\_KV.pdf](http://www.ceeweb.org/workinggroups/natura2000/resources/Bestpractice/HUN_2_KV.pdf))
- If we know the specific ecological patterns of particular species better, there might appear a lot of innovative, species-specific solutions. An example for such ecological patterns is *Prunus serotina*, an IAS in North-Western Europe. The survival rate of its seedlings is much higher in

Europe than in its natural area (North-America). The reason for that: it has a specific root herbivore in the soil fauna, with the role of controlling the plant populations, which was not introduced in Europe. Introducing the herbivore together with the plant at the early stage of its distribution might have had stopped it from rapid spreading.

Therefore, we recommend conducting ecological studies to find **specific, natural solutions against IASs**.

- We should be very cautious with introducing alien species especially in forestry, because there are already trends to introduce alien species which are supposed to perform better adaptation to climate change. This involves long-term irreversible consequences in the ecosystems, with unpredictable outcomes. We can never predict the behaviour of a plant species in a completely different habitat. Therefore, we support sustainable forestry where shift in species composition is a gradual and natural phenomenon as a response to climate change. The aim of management should be to **support the resilience and adaptation capacity of forest ecosystems**.

Similarly, **EU legislation for fisheries** must be improved in the direction of preventing the use of all alien fish species (each alien species introduced, can be considered as a potential threat).

#### 4. Concerning immediate practical measures, CEEweb suggests:

- Any future technical IAS legislation must have at least three basic elements: an early warning system for new IAS, a rapid response system to deal with outbreaks, and an eradication/roll-back programme to deal with existing IAS in sensitive areas. EU support structures and funding are needed to help Member States do this. Especially countries which are along the EU external borders (most CEE countries) need support to help them control borders against new IAS.
- Existing EU plant and animal health laws form a good foundation for broad IAS technical legislation. Currently these laws cover only commercial species - expand them to cover pathogens and plant/animal species which threaten biodiversity.
- Include IAS in the new EU Biodiversity Strategy: Besides further increasing financial resources for Natura 2000, more financial resources ought to be allocated in the remaining 83% of the EU not covered by Natura 2000, on sustainable use of land, on providing and maintaining ecosystem services, providing sustainable rural livelihoods etc. By implication, this means funding for IAS work wherever necessary.
- Specific, technical awareness-raising and exchange of experience (notably with countries which have a rigorous biosecurity policy such as Australia and NZ) is needed for key people like workers at IAS entry points like airports and seaports.

- To begin to open minds towards the true drivers of IAS, require DGs/member states to report on how current policies and economic trends contribute to IAS and to suggest proposals for their sector to do something about this. This would be an administrative reporting requirement similar to the SME impact assessments and other compulsory notes which must now be attached to draft EU legislation.
- Politically, besides DG ENV and the EP Environment Committee, support should be sought from DG AGRI and MARE and the EP Agriculture and Fisheries Committees. They ought to be positive because both these sectors suffer economic losses as a result of IAS.
- It is necessary to have a coherent and frequently updated monitoring system on IASs.
- Support research programmes (1) to find innovative, specific solutions for eradicating IASs, and (2) to assess specific management schemes resulting in greater resilience to IASs, with an integrated approach aiming also for healthy ecosystem services and sustainable land use. Make these practices available in the form of a practical guidance.
- Introduce obligatory 'IAS impact assessment' for every proposal for new or amended EU legislation
- Involvement of local volunteer groups, often led or organised by civil society groups, are a very cost-effective way to help fight IAS, as they are not asking money, they are just doing the work of their own initiative. They should be acknowledged, as a special form of public-private partnerships, and given immaterial support by EU and national authorities, to encourage them and hopefully get more volunteers.

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