Established in 1972, the British Association of Landscape Industries (BALI) promotes, supports and inspires over 900 Registered members including landscape contractors, landscape architects, garden designers and suppliers to be leaders of an environmentally, ethically and commercially sustainable landscape services industry. With over 1,800 members in total, including qualified training providers and students studying horticulture and landscape related qualifications, our professionals carry out a variety of landscaping works including garden design, landscape construction and grounds maintenance, as well as interior installation, maintenance and the supply of quality landscaping materials.

**Executive summary**

- To date, the UK and overseas territories have effectively managed the sources and impacts of invasive species. However, external sources are likely to introduce additional challenges which must be addressed.
- Continued management of invasive weeds is essential to ensure native habitats and landscapes are protected, but new approaches must be sought as new threats emerge and traditional methods of management become unsustainable.
- Support for tackling invasive weeds must be led by consumers. Consumers must be made aware of the potential threats from introduced invasive weeds, and of the power they have as specifiers when sourcing material.
- The UK does not operate in a vacuum, nor will it after Brexit. Trade of plants and associated material is likely to increase in the short and medium term, and measures must be taken to ensure the exchange of knowledge between the UK and European countries continues.

1. How well is the UK and its overseas territories managing the impact of invasive species and controlling the risks of further invasion?

1.1 According to the Joint Nature Conservation Committee, invasive species have become more prevalent in the countryside during the period 1960 – 2017. Comparing the latest period (2010 to 2017) with the previous period (2000 – 2009) suggests the number of invasive non-native species established in or along 10% or more of Great Britain's land area or coastline has remained constant in terrestrial environments (at 56 species), and has increased in both freshwater (from 12 to 13 species) and marine environments (from 23 to 28 species).

1.2 Whilst the increase of invasive species in the countryside has slowed, more must be done to tackle persistent weed species with new technologies. The chemical Glyphosate, which is the principle method of combatting a wide range of invasive species, is facing increasing hostility in the US and Europe. Beyond 2022 use of Glyphosate may be limited or even banned completely in some situations. There is currently a limited number of alternatives capable of controlling a wide range of invasive species. Research into viable alternatives is therefore essential for the continued management of invasive weeds.

1.3 BALI are frequently contacted by members of the public who are unsure of the correct way to manage invasive weeds on their property. Whilst good, balanced advice is available, it is not easy to find. The
Environment Agency, previously home to the (free) Japanese Knotweed Code of Practice (reportedly the most downloaded document in the history of the Environment Agency), which should be the primary information resource, now only contains basic information https://www.gov.uk/guidance/prevent-japanese-knotweed-from-spreading#prevent-spread-of-japanese-knotweed, which is not user friendly, nor does it offer advice relevant to home owners.

1.4 The revised Japanese Knotweed Code of Practice, produced by the Invasive Non-native Specialists Association, must now be purchased, although the respected Property Care Association now also produce a free document which contains best practice and guidance.

1.5 Regulation of businesses who provide services to manage invasive weeds is weak. Whilst respected organisations such as BALI and the Property Care Association vet members and maintain standards, a lack of wider regulation poses a risk to standards of work. With little quality control, code of practice or standards of accreditation, consistently high standards of management are unlikely and consumers face difficulties when identifying a service provider.

1.6 Clear guidance for effective, invasive weed control must be produced by central government and made freely available. The industry which manages (identifies, controls and eradicates) invasive weeds must be regulated by a system which advises both commercial and domestic consumers on a clear path to effective management.

2. Of those that are already in the UK, which invasive species are posing the greatest harm to:
   a. human health;
   b. animal health;
   c. plant health and biodiversity.

2.1 As a trade association for the landscape industry, BALI are best suited to comment on invasive species which pose the greatest harm to plant health and biodiversity. In our opinion, the species posing the greatest harm are:

   - Japanese knotweed
   - giant hogweed
   - Himalayan balsam

2.2 Whilst these species pose additional threats to human health and animal health, BALI are concerned primarily by the ability of each of the above species to inflict significant damage on ecosystems and landscapes found within the UK.

2.3 In an age where greenspace is at a premium, each of these species represent a serious threat or ‘waste’ of land, which serve no purpose to the landscape and arrest development of areas which may otherwise be used more effectively. The aggressive nature of these species drive out native plants, increase the potential for watercourse erosion and reduce habitat availability.
3. **What are the risks of invasive non-native species migrating to the UK from future climate change?**

3.1 As detailed in the RHS report ‘Gardening in a changing climate’, the risk of climate change to invasive species migrating to the UK are significant. Long-term changes in the UK climate may allow invasive species, which did not previously pose a threat in the UK, to become more prevalent due to changes in seasonal temperature or precipitation as the UK climate reflects the habitat of the invasive species. There is a fear that new invasive species may colonise the British Isles, which may give rise to issues such as:

- Decline in native species due to being out-competed by invasive non-native species
- Habitat damage or loss as a result of invasive by alien species
- Consequential environmental damage as a result of increased numbers of invasive non-native species. For example, Japanese knotweed, Himalayan balsam and giant hogweed can increase erosion of soil alongside rivers.

4. **What actions should the UK take to mitigate the risk, or adapt to, climate migrations of invasive species?**

4.1 Awareness of the risks associated with invasive species must be raised and promoted as a threat to the landscape of the United Kingdom. With reliance on imports that have the potential to introduce invasive species likely to continue in the short to medium-term, efforts must be made to ensure there is a demand for high quality, traceable plants and material, imported according to best practice. The demand for cheap, parallel imports that do not adhere to high biosecurity standards must be reduced. The most reliable way of reducing this demand would be to create a market that rejects material potentially hazardous to the UK landscape.

4.2 Responsible procurement of material that adheres to the highest biosecurity standards should be led by government agencies. Organisations supplying material for government projects must be contracted to deliver material that sets standards for biosecurity. In the medium term, material for such projects may even be entirely grown and sourced from within the UK.

5. **Where should the four nations prioritise resources to tackle invasive species?**

5.1 Promotion of the dangers associated with invasive species must be increased. Commercial and private consumers must be engaged through campaigns that unite growers and retailers. Ensuring demand for plants and material is through responsible suppliers is key to controlling one large aspect of species introduction.

5.2 Research into early detection, location plotting and management of invasive species is essential to ensure resources are focussed on threats which represent the greatest threat to the four nations.

6. **How can the risk of trade and future trading relationships bringing non-native invasive species to the UK be mitigated?**
6.1 The current system of biosecurity management is not sustainable given the continued reliance on imports, limited resources for monitoring imported goods and lack of public awareness of the risks associated with invasive non-native species. To mitigate any net loss of ‘security’ these issues must be addressed.

6.2 Awareness of the risks associated with imported goods is low. Not just amongst the public, but throughout the amateur gardener consumer base. Without greater awareness of the risks, the public will continue to drive demand for plants imported outside of the traditional channels (and therefore without any biosecurity checks), or for plants which are officially imported, but pose a far higher risk to native species and UK biosecurity.

6.3 Greater awareness must be driven by collaborative government and industry campaigns which focus on the risks associated with non-native species, pests and disease. Such campaigns must be delivered to a wide audience, not only the amateur gardener or professional market. This will prevent demand for plants and materials which pose a risk to the UK.

7. How effective have the European Union’s Invasive Alien Species Regulations been at addressing and tackling invasive species?

7.1 The European Union’s Invasive Alien Species Regulations have been instrumental in ensuring the UK has met potential threats with a degree of preparedness that would otherwise have been absent. The regulation has ensured new threats have been identified in a timely manner and member states have had the opportunity to develop knowledge necessary to identify and manage species.

8. In the event of EU exit, how should the UK establish its replacement for the European Commission’s scientific forum to update the species list of concern?

8.1 The Department for Environment, Food and Rural Affairs, together with the Animal and Plant Health Agency, must take a more proactive role in the identification of risk from alien species and subsequent management. The government must work with land-based industries to raise awareness of risks as they are identified and seek to manage them according to best practice.

9. How should the UK work with the European Commission and others internationally to reduce the risk of invasive species?

9.1 Knowledge sharing is critical to the successful management of invasive species. The opportunity for experts within government departments to share knowledge on a common, online platform would ensure the threat from invasive species is managed.

April 2019

References

Joint Nature Conservation Committee: Pressure from invasive species
http://jncc.defra.gov.uk/page-4246

RHS Gardening in a changing climate