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Rialtais Áitiúil agus Oidhreachta**
Department of Housing,
Local Government and Heritage

SUBMISSIONS REPORT

Report on the submissions received from the Public Consultation on:
Ireland's Invasive Alien Species Angling Pathway Action Plan
and,
Ireland's Invasive Alien Species Recreational Boating and Watercraft
Pathway Action Plan

March 2022

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Background

The introduction of invasive alien species into aquatic environments can significantly impact on the wildlife, habitat structure and functioning of the waterbody. This affects our dependence on and interaction with the waterbodies including the loss or alteration of fisheries, clogging of waterbodies and waterways, the quality and supply of water, and impacts on water sport and other recreational activities. Once invasive alien species become established in the aquatic environment it can be very difficult, if not impossible, to control or eradicate them.

As invasive alien species can be unintentionally transported with angling and recreational boating and watercraft activities, action is needed to reduce the risk of introducing and spreading invasive alien species into and between waterbodies in Ireland by these two pathways.

Developing action plans to tackle the priority pathways of unintentional introduction and spread of invasive alien species of Union concern in Ireland is a requirement under the EU Invasive Alien Species Regulation. In 2020, two Working Groups were formed to support drafting of the following two pathway action plans:

- Ireland’s Invasive Alien Species **Angling** Pathway Action Plan
- Ireland’s Invasive Alien Species **Recreational Boating and Watercraft** Pathway Action Plan.

Successful implementation of the Pathway Action Plans will support implementation of regulation and policy and ultimately reduce the impacts of invasive alien species on waterbodies, the ecosystem services they deliver, and the socio-economic benefits derived from them.

To provide an opportunity for all interested parties to make their views on these Pathway Action Plans known, the Department of Housing, Local Government and Heritage launched a Public Consultation on 9th December 2021. The two draft Pathway Action Plans were made available for download from the National Biodiversity Data Centre’s invasive species website from <https://invasives.ie/biosecurity/pathway-action-plans/> where additional information on pathway action plans was also made available.

The consultation process ran for just over 8 weeks from 9th December 2021 until 4th February 2022.

This paper provides a summary of the views and opinions offered by stakeholders through the Public Consultation process.

Summary of submissions feedback received

A total of 7 submissions were made for the Angling Pathway Action Plan, 9 submissions for the Recreational Boating and Watercraft Pathway Action Plan and a further 2 general comments. Submissions were received from a diverse range of 12 stakeholders in total including stakeholder representative organisations, clubs, state agencies, private companies and local authorities. These are shown in Table 1.

Table 1. List of organisations that made submissions during the Public Consultation

Organisation	Angling	Boating & Watercraft
APEM Limited		✓
Connaught Angling Council	✓	
ESB	✓	✓
Inland Fisheries Ireland	✓	✓
Killarney Salmon & Trout Angling Club	✓	✓
Lough Carra Catchment Association	✓	✓
Lough Corrib Navigation Trustees		✓
Oughterard Angling Club		✓
University College Dublin	✓	✓
Waterways Ireland	✓	✓
General comment submission		
Kerry County Council		
Wexford County Council		

The submission feedback is summarized in three sections:

1. Key points raised relevant to both the Angling and to the Recreational Boating and Watercraft pathway action plans
2. Key points raised specific only to the Angling Pathway Action Plan
3. Key points raised specific only to the Recreational Boating and Watercraft Pathway Action Plan

Key points raised relevant to both pathway action plans

This section provides a summary of the key points raised in the submissions that are relevant to both the Angling and the Recreational Boating and Watercraft Pathway Action Plans.

1. General comments on the pathway actions plans

There is an overall welcome for the development of the pathway action plans as urgent action is needed to prevent further introductions of invasive alien species. The Pathway Action plans were seen as a very important step to raise the awareness of invasive species issues and the variety of actions needed to address the pathways. The positive role that anglers, recreational boaters and water users can play is acknowledged. However, some additional points were raised:

- To more clearly state that the pathways also refer to movement between catchments within Ireland and not just into Ireland from abroad.
- To consider stating that anglers/water-users should always assume that the waterway contains invasive species and act accordingly with their subsequent movements.
- No reference is made to the role of human actions in creating suitable habitats for invasive species.
- The need to widen the reach to the public domain through national awareness campaign mainstream media or TV.
- To note that some introductions of invasive alien species are deliberate.

2. The key actions and outcomes

The main comments submitted on the key actions and outcomes were:

- To identify who is responsible for delivery of the actions where it is not already stated.
- To identify how and when the actions will be delivered on.
- The actions should be more stringent.
- more concrete on the ground actions are needed with some being government led and funded.
- Recognise that implementation of some actions such as installation of signs and wash-down facilities, may need to adhere to planning and other environmental considerations - especially in sensitive zones such as National Parks, which require multiple stakeholder involvement beyond the site owner/manager.
- Refine some of the outcomes to be measurable where relevant and possible.

3. Biosecurity actions

There were many comments submitted relating to overarching biosecurity measures addressed in the pathway action plans. A synopsis of these is:

- Strong support for a border biosecurity campaign to be implemented at Ireland's border high risk routes of entry - ports in particular.
- Suggestion that there is a need to stop all movement of boats and watercraft on and off lakes as there is concern that even using the Check Clean Dry measures, that a boat cannot be guaranteed free from pathogens.
- Suggestion to Introduce boat registration at catchment level.
- Recommendation that Standard Operation Procedures (SOPs) are required to encourage the safe and legal usage of pesticides/herbicides and disinfectants as they will be promoted and used more widely as part of the pathway action plans.
- To clarify some of the biosecurity measures and why they are needed.
- More information will be needed on the operation of cleaning and disinfection stations such as 'where will the foul water be discharged?'

4. Funding

Concerns were raised that provision of funding was not addressed in the pathway action plans.

Some of the comments related to funding include:

'It is vital that substantial investment and resources are provided to implement the actions.'

'Invasive species are a serious and ongoing environmental problem - solving the problem is not possible without committing resources, money and people. A lack of discussion of these matters greatly weakens both reports.'

5. Policy, legislation, and enforcement

Six organisations made submissions related to policy, legislation and enforcement. The main commentary focused on the need for a legal instrument to enforce implementation of biosecurity measures. Comments included:

- Restriction on movement of boats to be enforced with legislation
- Need to have local authorized officers that can be contacted in event of breach of biosecurity guidance.

- The Water Framework Directive and numerous other environmental laws need to be implemented to protect our lakes and rivers.
- For on-site measures: what key instrument will force managers of sites to install biosecurity facilities.
- Who will verify boats are free from invasive species?
- A need to educate the Garda and Custom & Excise on the law involving the movement of live fish and biosecurity within Ireland and in particular at point of entry from the UK and Continental Europe.
- Ensure that in order to bring watercraft through the ports that the craft are decontaminated and that visiting anglers are advised to decontaminate their gear. Legislation should be introduced to back up these measures and a system of on-the-spot fines introduced for non-compliance.
- In reference to the draft standards that were developed for the Shannon catchment as part of the Masterplan for the Shannon 2020 – 2030 these should be developed and delivered but a recommendation is made there should be a widening to a national network of facilities. This needs to be incorporated into a national strategy and not limited to any one catchment or area.

6. Species lists

Regarding the appendix draft list of freshwater, marine and pathogen species of priority concern to keep out of Ireland and for which there may be a risk of introduction via angling and recreational boating activities, the following submissions were made:

- to explain how the draft species lists were compiled, i.e., why they were selected.
- to add the regulated [S.I. No. 477/2011 Third Schedule](#) species list.
- to state in the tables, what the objective or target for each species is? For example, to control within Ireland or keep out/exclude from entry.
- to provide a commentary on other non-native species whose risk of invasive impact may become elevated with increased dispersal.
- Will there be a centralised tailored resource (e.g., on National Biodiversity Data website) for waterway owners to access data indicating the confirmed presence (or high risk of presence due to hydrological connectivity with other properties) on their respective sites that can then be used to target and rollout facilities/signage?

7. Management of the Pathway Action Plans

There were queries relating to the management of the pathway action plans. Specifically, these were:

- Will regular correspondence on the Action Plan issue to key stakeholders during the 2022 to 2025 period?
- Will preferred timelines for site-owners/managers to deliver the on-site measure key actions be given?
- Will individual Action Plans need to be developed and published for each waterbody, or for parties with numerous waterbody ownerships, will a single overarching summary plan with generic actions, with site-specific appendices be the recommended approach?

8. Other points raised
- No proposals are included for assembling or funding an expert team capable of eradicating a new species before it is too late.
 - The appendices are a useful resource.
 - Suggestion to have two versions of the Pathway Action Plans, one for the public and a second for the stakeholders/public bodies.
 - Should rapid response be covered as a separate action with its own outcomes, e.g., development of rapid response plans for key species, identification of delivery bodies to undertake delivery?
 - Clarification on the “Actions on invasives” portal is required. What is it and how will it work?
 - Need to briefly explain how to report alert invasive alien species directly to the National Biodiversity Data Centre.
 - Query if there will there be recommendations forthcoming for ownership parties of waterbodies with high incidence of access/egress points?

Key points specific to the Angling Pathway Action Plan

In addition to the key points raised that relate to both Pathway Action Plans, the below points were raised per action for the Angling Pathway Action Plan. These are listed by action number with a brief outline of the action (in italics) and then the submission comment made.

Action 1: *A Survey of angler levels of awareness* - this will be a considerable undertaking and will require resources.

Action 4: *Display of the Check Clean Dry Disinfect logo on licences/permits where possible* – Inland Fisheries Ireland have statutory remit for salmon and sea trout licences. A variety of fishery owners administer fishing permits. Messaging should be agreed and consistent – Clean Check –Dry or Clean-Check-Dry/Disinfect.

Action 5: *Angling event organisers will raise awareness of biosecurity guidelines to participants prior to events and support implementation of biosecurity actions at events* - This can also include commercial fishing venues. Resources should be compiled and made available widely regarding the “no dip – no draw” clean kit policy.

Action 6: *Installation of biosecurity awareness signage and provision of biosecurity facilities where possible at water entry/egress site points* - It mentions “biosecurity facilities”. A template and guidance for how these should operate is required. There are potentially many thousands of entry/egress points around the country. Might be more achievable to place signage at for example well-known match/competition stretches and slipways.

Action 7: *All anglers - the biosecurity regime of check, clean, dry or disinfect should be used as a regular practice* - Apply consistent messaging – Check-Clean-Dry.

Action 8: *For sites with priority invasive species present, signage and biosecurity facilities will be installed. It is likely that this will need to be evaluated for risk management on a case-by-case basis* - this action references an evaluation for risk management – clarify who is involved in this.

Action 9: *Implement an emergency biosecurity response at sites to contain/reduce risk of spread when a newly introduced high risk invasive alien species has been detected - provide further information on the “emergency biosecurity response”.*

Table 1: Angler biosecurity actions decision aid table - it was suggested that this table could be improved to be more pictorial, or flow chart like in order to make it more readable to the user.

Submission quote:

"Anglers are required to prevent the spread by quick identification and reporting which is as important as being a vector or pathway facilitating spread"

Key points specific to the Recreational Boating and Watercraft Pathway Action Plan

In addition to the key points raised that relate to both Pathway Action Plans, the below points were raised per action and recommendation for the Recreational Boating and Watercraft Pathway Action Plan. These are listed by action/recommendation number with a brief outline of the action (in italics) and then the submission comment made.

Action 1: *Survey of recreational boaters’ levels of awareness on IAS issues and biosecurity in 2021 and 2025* – Can the 2021 survey results could be shared in this document somehow? Following up with a second survey is a great action. If the follow-up survey shows no change in user awareness, is there a plan in place to address this? Perhaps a ‘sub-action’ should be included here to address this.

Response note: the year 2021 should have read 2022 – this is a typo in the draft Pathway Action Plan.

Action 3: *The National Parks and Wildlife Service will implement a border aquatic biosecurity campaign targeting high risk routes of entry to Ireland from outside the island of Ireland* - Could more details of what the biosecurity campaign will consist of be provided? Could NPWS engage with/collaborate with key players, e.g. ferry companies, border control?

Action 5: *Water sport event organisers will raise awareness of biosecurity guidelines to participants prior to attending events and support implementation of biosecurity actions at events* - A potential outcome here could also be an increased up-take by stakeholders and recreators in biosecurity measures application. This is a good outcome, but it may be challenging to measure. Is there a plan in place for how to measure this outcome?

Action 6: *Owners and managers of sites/waterways that contain invasive alien species of priority concern (Appendix III) and where recreational boating activities occur, will install facilities and signage to promote very high levels of biosecurity*

- what key instrument will force such managers of sites to install these facilities. Will a list of locations and facilities be published?
- include the large national network of self-service hot water wash down facilities at garages.

Action 8: *Implement an emergency biosecurity response at sites to reduce risk of spread when a newly introduced high risk invasive alien species has been detected. One such measure could include the restriction of water-based activities at or into that site.* - This Action lists some guidance. Could more measures be provided as guidance here, as well as for other actions that might require guidance?

Action 11: *Recreational boating representative organisations will help facilitate and encourage uptake of good biosecurity practice by boating sectors and clubs by: Providing biosecurity training [online and seminars]; Encourage clubs to have a biosecurity policy and follow a biosecurity code of conduct.*

- Providing these actions/measures here is very helpful. Wonder if this could be provided for all actions? Could this be more up-take of biosecurity actions as a clearly measurable/definable outcome?
- This action should be higher on the listing as it is a higher priority – possibly ties in under 1-5.

Action 12: *Identify if additional training resources are needed to facilitate effective implementation of biosecurity measures by the boating community* - Could another action be added to cover resourcing and delivery of the identified gaps?

Recommendation 3: *Establishment of laws/by-laws to allow provisions for implementation of biosecurity standards for water sport vessels/equipment entering Ireland or moving between catchments in Ireland* - What is the legal basis for establishing ByeLaws on waters that do not come under the remit of Waterways Ireland?

Recommendation 4: *That there is one organisation/go to point, for access to updated and approved biosecurity information, resources, and advice on invasive alien species* - Who is the lead agency?

Recommendation 5: *Introduce boat registration at catchment level*

- Works well in Killarney lakes (bar transient watercraft canoes etc).
- For sites where boat registration and restriction of movement is in place, there is free movement of watercraft such as kayaks/canoes etc. Having a clear nationally enforced regime for such transient crafts as kayaks/ canoes should be of great benefit to alleviate the potential for contamination of waters.

Appendix II – Recreational boating biosecurity guidance

- Include removing any plants caught on trailer.

- the **decision tree** to identify the biosecurity actions required is focussed on the hull of the boat and this should be expanded to the bilges and live wells. Engines require flushing and trailers can also trap significant amounts of material.

Appendix III: add into the table the list from the 3rd schedule THIRD SCHEDULE Non-native species subject to restrictions under Regulations 49 and 50 of SI 477/2011 European Communities Birds and Habitat Regulations 2011.

Next Steps

The Irish Government is very grateful to all those who took the time to respond to this consultation. The submissions will inform the deliberative process in finalizing the pathway action plans and help to inform the Irish Government's consideration of the way forward.

This Public Consultation Submission report will be sent directly to all those that made submissions and it will also be made publicly available from: <https://invasives.ie/biosecurity/pathway-action-plans/>.

The submission comments will be discussed within each of the Pathway Action Plan Working Groups and the draft plans will then be finalized.

Final versions of Ireland's Invasive Alien Species Angling Pathway Action Plan, and, Ireland's Invasive Alien Species Recreational Boating and Watercraft Pathway Action Plan will be published on <https://invasives.ie/biosecurity/pathway-action-plans/> with notice of their publication issued through the Department of Housing, Local Government and Heritage and the National Biodiversity Data Centres' websites and social media accounts.