

EAZA Position Statement on the developing EU Strategy for Invasive Alien Species (IAS)



September 2010

Introduction

This statement presents the position of the European Association of Zoos and Aquaria (EAZA) on the developing EU Strategy for Invasive Alien Species (IAS).

While EAZA recognises that IAS, particularly botanical species, remain a concern in relation to native species sustainability in Europe it does not believe that the introduction of an additional Directive, or other additional regulatory measures, is the best approach to tackling this issue. EAZA understands that some parties to this discussion have proposed a 'white list' approach to IAS, whereby only a small number of species that have already undergone a risk assessment would be approved. We strongly disagree with such an approach, which would almost certainly lead to a significant number of animal species currently responsibly managed in human care in EU Member States, and which clearly pose no threat to native species, being banned as they have not been risk assessed.

This would be an unrealistic and onerous approach to the control of species that potentially threaten European native species. A more pragmatic and sensible approach should be taken. We are particularly concerned as to what impact a 'white list' approach would have on zoos and aquariums, who are already legislated for via a number of other regulations and directives, notably the Zoo Directive (1999/22/EC), in respect of careful control of animals and their containment.

The remainder of this statement will provide further detail on EAZA's position.

EAZA's current status and general position;

- As laid down in EAZA's constitution the objects of the association are: **a.** to promote co-operation for the furtherance of wildlife conservation, through internationally coordinated breeding programmes of wild animals and *in situ* conservation; **b.** to promote education, in particular environmental education; **c.** to promote scientific study; **d.** to represent the interests of its members;
- EAZA represents 325 members from 36 countries, 300 of which maintain public collections of animals. More than 280 institutions of the total EAZA membership are located within the European Union.
- EAZA member institutions receive approximately 140 million visitors a year and house more than 250,000 animals, excluding fish and invertebrates. EAZA member institutions employ 20,000 staff members, 5,000 of which are seasonal;
- EAZA members are often important economic drivers and cultural centres in their local communities;
- In the context of local areas EAZA members are often important 'opinion formers' on environmental issues, including that of invasive species;
- EAZA has a significant social role in educating European citizens about animals, their conservation, and overarching threat processes such as climate change, habitat loss and how consumer behaviour interacts with these global challenges. Zoos and aquariums have been

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demonstrated to host a far more representative and inclusive visitor social spectrum than either museums or science centres;

- EAZA has adopted the World Zoo and Aquarium Conservation Strategy (2005) which articulates the modern role of zoos and aquariums and their commitment to conservation;
- EAZA institutions in the European Union comply with Council Directive 1999/22/EC relating to the keeping of wild animals in zoos;
- From 2008 to 2010 EAZA ran the European Carnivore Campaign (www.carnivorecampaign.eu), a campaign supported by the Council for Europe that demonstrates our commitment to the conservation of European animal species;
- In 2003 EAZA issued a statement on IAS to all its member institutions (see additional document).

We believe;

- The current EU focus on the potential risk of invasive species in Europe is welcome in that it recognises that invasive species are a threat to our native biodiversity;
- That there is sufficient legislation in place (Appendix 1) that can be enacted to control threats from invasive species;
- That banning non-risk assessed species from human care throughout Europe would be a retrograde step;
- That a 'one size fits all' policy is inappropriate for an environmentally diverse area such as the Member States of the EU;
- That a 'white list' approach, where only a small number of species are approved and that all other species alien to EU Member States would be banned from being held in human care in zoos and aquariums, until full risk assessments have been undertaken, is an unacceptable option;
- Zoos and aquariums in EAZA comply with all EU member legislation as it applies to their collections and are rigorous in their efforts to prevent escapes from such facilities. EAZA has rigorous 'Animal Care Standards' to which its member institutions comply and an additional statement on IAS with which members must comply;
- Zoos and aquariums in EAZA do not pose a significant risk in reference to IAS. A Directive requiring all non-native species to undergo a full risk assessment to see if they could, potentially, pose a risk (species such as elephants, tigers, wombats, hornbills etc.) would be inappropriate, take many years, be nonsensical, and would be prohibitively costly;
- The vast majority of non-native species held by zoos and aquariums *do not pose any risk at all* and should therefore be excluded from this otherwise well-intentioned strategy;
- A 'white list' approach would be costly and likely lead to extensive non-compliance across Member States.

What we would like to see;

- Improved enactment of existing legislation (Appendix 1) to tackle issues associated with threats from IAS;
- That any moves to designate species as potentially invasive are proportionate and based on risk assessments of the highest scientific standing;
- That a 'black list' approach, wherein species known or thought to be a significant risk are assessed and that any provision for them to be held in human care, for example in zoos and aquariums, would be controlled using existing legislation and viewed in the context of the overarching conservation benefits of management and breeding in such a setting;
- That such a 'black list' approach should be country by country to take into account different climatic conditions and environments, which affect the potential for an alien species to become invasive;

- Such a 'black list' approach should be based on rigorous risk assessments with full stakeholder participation;
- That the full costs of such risk-assessments must be borne in mind;
- That the EU, in any future deliberations on IAS, pays close attention to the role of responsible zoos and aquariums in education, conservation and research;
- That the EU recognises the unique position and professionalism of EAZA members in maintaining non-native species for the purposes noted above and that this responsible approach should not be penalised or indeed hampered by legislative conditions that make human care of such species difficult if not impossible. This would impact not only on conservation of many species, but on the environmental education opportunities for European Union citizens who visit EAZA members and on the economic input of zoos and aquariums into their local economies.

Appendix 1

Existing international legislation relating to this issue includes;

The Bern Convention

A4.1. *The Convention on the Conservation of European Wildlife and Natural Habitats* (the "Bern Convention"), adopted by the Council of Europe on 19 September 1979, aims to conserve wild flora and fauna and their natural habitats, especially those species and habitats whose conservation requires the co-operation of several States, and to promote such cooperation. Particular emphasis is given to endangered and vulnerable species, including endangered and vulnerable migratory species. Article 11(2) of the Convention requires that:

"Each Contracting Party undertakes:

- a) to encourage the reintroduction of native species of wild flora and fauna when this would contribute to the conservation of an endangered species, provided that a study is first made in the light of experiences of other Contracting Parties to establish that such reintroduction would be effective and acceptable;*
- b) to strictly control the introduction of non-native species."* (note: this applies to ALL exotic forms, including hybrids)

The Bern Convention forms the basis for the *Council Directive 92/43/EEC*, the "Habitats Directive" (see A4.3. below).

A4.2. Further to this Convention, the Committee of Ministers to Member States have made Recommendations concerning the introduction of non-native species¹ and on the reintroduction of wildlife species². These recommendations state that the introduction of non-native species into the natural environment be prohibited where adverse effects on the ecosystem may occur. However, certain exceptions to prohibitions may be authorised on the condition that the possible consequences are assessed beforehand.

Where reintroductions are considered, they should only be undertaken after carrying out research and implemented under scientific supervision. It is recommended that interested parties be informed of such reintroductions. Also, collecting stock for reintroductions should be prohibited from populations which would be threatened as a result.

¹ Recommendation No. R(84)14 adopted on 21 June 1984

² Recommendation No. R(85)15 adopted on 23 September 1985

Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora

A4.3. The "Habitats Directive", adopted by Member States on 21 May 1992, also aims to conserve wild flora and fauna and their natural habitats and is based on the Bern Convention. *Article 22(b)* states that, in implementing the provisions of this Directive, Member States shall:

"ensure that the deliberate introduction into the wild of any species which is not native to their territory is regulated so as not to prejudice natural habitats within their natural range or the wild native fauna and flora and, if they consider it necessary, prohibit such introduction. The results of the assessment undertaken shall be forwarded to the committee for information."

Council Directive 79/409/EEC on the Conservation of Wild Birds

A4.4. The "Birds Directive" aims to protect wild bird species and their habitats. *Article 11* states that: *"Member States shall see that any introduction of species of bird which does not occur naturally in the wild state in the European territory of the Member States does not prejudice the local flora and fauna. In this connection they shall consult the (European) Commission"*.

Convention on Biological Diversity

A4.5. The Convention on Biological Diversity was opened for signature on 5 June 1992 at the United Nations Conference on Environment and Development at Rio de Janeiro, after adoption on 22 May 1992 at the Nairobi Conference for the Adoption of the Agreed Text of the Convention on Biological Diversity. The Convention entered into force on 29 December 1993. The objectives of this Convention are the conservation of biological diversity, the sustainable use of its components and the fair and equitable sharing of the benefits arising out of the utilization of genetic resources.

The Convention specifically addresses the introduction of non-native species. *Article 8(h)* states that:

"Each Contracting Party shall, as far as possible and as appropriate:

(h) prevent the introduction of, control or eradicate those alien species which threaten ecosystems, habitats or species.

IUCN Position Statement on Translocation of Living Organisms: Introduction, Re-introductions and Re-stocking.

A4.7. The World Conservation Union (IUCN) position, published in 1987, is that introductions should only occur if there are clear and well defined benefits and if no suitable native species are available. It sets out general principles for determining the desirability of intentional introductions in natural, seminatural and human-made habitats, discouraging accidental introductions, undertaking eradication measures and administering introductions in national and trans-boundary contexts.

FAO Code of Conduct for the Import and Release of Exotic Biological Control Agents

A4.8. The United Nations Food and Agriculture Organisation's Code of Conduct, published in February 1996, sets out the responsibilities of Government authorities, exporters and importers of biological control agents capable of self-replication (parasitoids, predators, parasites, phytophagous arthropods and pathogens) used in research and for environmental release, and describes three responsibility phases; pre-export, pre-import and post-import.

ICES Code of Practice on the Introductions and Transfers of Marine Organisms 1994

A4.9. This Code of Practice, adopted by the International Council for Exploration of the Sea in September 1994, recommends practices and procedures to diminish risks of detrimental effects from the introduction and transfer of marine organisms. It provides recommendations for new intentional introductions and suggests that member countries submit proposals to ICES for an opinion on a proposed introduction.

Local country legislation is also in place in many EU Member States to control the potential of IAS.