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c/o Committee Clerk: Stella McArdle

Committee for Agriculture and Rural Development
An Coiste Talmhaíochta agus Forbartha Tuaithe
Seomra 243, Foirgnimh na Parlaiminte
Baile Lios na Scáth, Stóir Mhonaigh
Béal Feirste, BT4 3XX

Re.: Submission on Review of Tree Disease and Biosecurity Issues: AFBI / DARD
Tag.: Aighneacht fán Athbhreithniú ar Shaincheisteanna a bhaineann le Galair na gCrann agus le Bithshlándáil: AFBI / RTFT

A chara,

Many thanks for the opportunity to contribute to the '*Review of Tree Disease and Biosecurity Issues: Stakeholder Event*' held on 19 February 2013. Following on from the event we would like to rise and reiterate some salient points and related issues, which our community development group in rural South Derry thinks are important in terms of safeguarding our community's economy, heritage, health and wellbeing into the future. Many of these issues have knock on effects in terms of lost opportunities to businesses and hidden costs for other government departments and sectors of social and economic life, which although indirect, nonetheless are of paramount importance to consider.

The ash, along with other species of tree, is an important part of our cultural and landscape heritage. The loss, or significant reduction of this species, impacts greatly on both of these heritage aspects. The same holds true for all species of tree.

The main issues as we see them are as follows:

1. **Fortress Island Mentality:**

Disease doors into Ireland remain wide open. There appears to be a perception that restrictions on the routes for diseases into the EU should be effective in reducing the risk of disease reaching Ireland. This is naïve and wishful thinking.

Additionally, Ireland has a reduced assemblage of wildlife compared to Britain, which in turn has a reduced assemblage of species in comparison to mainland Europe. This is also true in terms of diseases and pests. Therefore, we are in a unique position from Britain, as much as Britain is in a unique position from the mainland.

Thus, as an island nation off another island, we have an additional unique opportunity to protect ourselves. Our own Fortress Island Mentality should further benefit from the Fortress Island Mentality of our colleagues in Britain. In practice this means that both we and our British colleagues should be aware of diseases that exist in Britain but not in Ireland, and seek not to introduce these to this island. We need to grasp this opportunity and implement safeguards against diseases, not only from mainland Europe, but also those that slip the net into Britain. Consider our mentality in relation to diseases such as foot-and-mouth and rabies, which impact mainland Europe.

One way to ensure the above is to increase our own self-sufficiency locally in woodlands to produce wood as a raw material and to produce saplings as livestock. This will increase our biodiversity responsibilities (see below), and also increase our economic opportunities whilst closing outflow of local revenue to mainland Europe (see below).

2. Biodiversity

There is a fundamental misunderstanding among many in the environmental / conservation sector at present as to the difference between native species and local provenance. Products sold are often mislabelled. Planting ash trees from Germany, from France, from Scotland, or even from Munster, do not represent trees of local provenance. They reduce not only our unique biodiversity, but also reduce the capacity of the ash tree as a species to maintain genetic variation that is the passport to resilience against diseases of the species.

Trees from outside our own biogeographical unit (which is a purely ecological / biological concept – but with economic and biological uses) threaten that. They reduce the space for our reduced population of local natives, and they produce hybrids which homogenise our trees with trees from other areas. Hybrid trees can be more susceptible to disease from e.g. continental Europe, where a disease has cracked the species' genetically-controlled defences there.

This issue is one of the spectrum of monoculture – which makes crops and livestock susceptible to disease and pests.

Importing trees from western Scotland is not an answer to this either – even though it is often promoted. These trees would be well adapted to our climate, but they are not of local provenance. They have their own unique biogeographical unit traits, that would swamp ours in Ulster. We have great biodiversity in our own trees. We need to exploit this.

Nursery growers need to grow local native trees from many different local trees. At present nurseries often only select a few good trees, and hundreds of seeds are grown from these few 'parent' trees. This is not enough to ensure future genetic integrity of our local trees, as this is in itself tantamount to monoculture. Seedlings from many parents are needed.

As a species, ash is important in terms of our local biodiversity, both in itself as a species, but also in terms of the other species it supports. Certain fauna rely solely on the ash tree as a food plant. Therefore, the impact upon our local ecology in relation to other species must also be considered. We have areas of conservation designation which are designated on the basis of their ash woods. Our executive has responsibly under the **Biodiversity Strategy** and the **EU Habitats Directive**, and therefore these must also be fully considered in any strategy regarding tree diseases.

2a. Exporting local seed to grow abroad, for re-importation – issues:

To meet the demand for native trees of local provenance (and in keeping with issues around biodiversity), local seed is often exported abroad, grown for example in the Netherlands, and then reimported. However, this is an opportunity for the native seeds and saplings to collect disease in the country to which they have been exported and to bring them back here, whilst also risking bringing in soil pests and parasites that impact upon other crops and vegetables. We need to consider this in terms of the **Invasive Species Strategy**. Invasive species are costing us millions of pounds per annum and the figure is increasing annually.

We are also missing a trick in terms of economics. We are exporting our local resource for another state to add value to that resource and then sell it back to us. This is a local business opportunity which needs to be secured as a native industry to maintain revenue domestically and to create employment opportunities, be they fulltime or part-time.

2b. Labelling:

Labelling of tree stock to describe its provenance plus where it is grown is an important move. Labelling a tree as native would not solve the issue. An ash tree of Finnish stock grown in the Netherlands and grown here would be encompassed by such a label. To label a tree as UK stock, would also risk the issues of disease and biodiversity. Provenance should be labelled to parent tree location to at least county level; and location of nursery to at least county, as well.

The consumer and those impacted by the choices of other consumers should be protected with information which is easy to collect and passport in the nursery environment.

2c. Genetically modifying / selectively breeding stock

Pedigree-ing / genetic monoculture versus resilience of native stock through natural genetic diversity (facilitating natural resilience to disease and pests). Selective breeding is often seen as a necessity in crop management and development in modern agriculture. However, if transferred as a concept to our native tree crop – as

suggested by some – it would thwart biodiversity and genetic conservation and it increases risks of monoculture as described above already.

Having such monocultured genetically selected crops leads to greater use of pesticides and fertilisers, as we attempt to force the ‘perfect tree’ to grow in every situation in the country. This leads to issues of:

- Water pollution
- Bio-accumulation of chemicals – including to humans
- Reduction in wild pollinators in the environment for other sectors in agriculture and food production
- Reliance on chemicals (especially oil-based ingredients and energy), which reduces local economic resilience for the future and increases costs to production

3. Lost business opportunities

Our lost business opportunity, but which is being enjoyed by those in mainland Europe, has been outlined in Section 2a.

In particular, the business opportunity currently lost should benefit the local farming and rural community in terms of diversification. This is an opportunity to bolster the sustainability of the rural community as well as start a new culture in silviculture in Ireland in terms of native trees.

In terms of grants for planting trees and woodland, there is the need to consider space and time lags on farmers and landowners. The requirement to plant saplings of certain ages and the need to wait a certain number of years for grants to materialise, is an unnecessary onus and condition. Broadcast of seed of local provenance (as opposed to saplings) in the site of planting has advantages. It removes the need for space and time ‘to grow on’ saplings for a number of years in the nursery, which reduces costs for those supplying the stock. Success of each individual seed and sapling would of course differ, but such detail should not outweigh the benefits, and does not represent an issue which could not be remedied by supplementary planting where and when needed.

4. Increasing local tree resilience

One means of increasing the resilience of our local trees as a population, if not as individuals, is to plant more trees, in the hope – and with statistical probability – that a certain percentage of the trees will have a natural immunity to certain diseases. Planting more trees means that any percentage of resilience will represent a greater number of trees in real numbers (i.e. a greater number of surviving individuals in the countryside.)

4a. Flood Risk Management Opportunity and Water Quality Protection:

Woodlands can act as significant enviro-service providers that reduce risk and reduce costs on other sectors of society and business, e.g.

- River-side and wet woodlands can act as part of soft engineering strategies to reduce flood risk to property and possessions (reference: **DARD's Land Use and Flood Risk Management Workshop** 27th November 2012.)
- River-side and wet woodland belts protect rivers from agricultural run-off and pollution, and therefore aid the farmer in protecting the water services paid for and utilised by all, whilst also ensuring that we meet our Executive's obligations under the EU's Water Framework Directive.
- River-side and wet woodlands increase aquatic biodiversity, therefore, supporting our fisheries for both commercial and tourist sectors. This supports local fishermen in jobs and bolsters those employed in the local tourism sector.

5. EU regulations on trade – local regulations

We appreciate that in terms of regulations it would be very difficult within the EU to place a ban on imports. However, as in the case on animal livestock, effective protective could be brought about by stringent quarantine provisions within a sealed growing environment with disease testing required for a period of time for all imported trees and other plant-stock (and for a regularly updated list of other potential disease carrying plants).

6. Enforcement

From an enforcement point of view it is important that Biosecurity measures are enshrined in strong legislation that is mirrored within the two jurisdictions of Ireland. It is also important that enforcement is properly financed and supported. It is important that any legislation makes provision for criminal as well as civil penalties if the legislation is to be taken seriously.

Concluding remarks

The ash die back issue has highlighted great holes in our biosecurity. Reviewing this issue however is a great opportunity to join up our government department actions to complement each other and not to create difficulties (and thus costs) for each other. Each department action must not seek to optimise its own results if in doing so it causes detriment or opportunity loss in other sectors that is greater than the benefit gain of the offending department. Government action should strive to act for the benefit of society, and not for the optimisation of narrow unilateral department / agency targets. This of course would need the realisation that government departments must be allowed to be flexible to allow for this, and bend to

accommodate, and not be castigated for any shortfall in target objectives should any objective accommodating action to other sectors and departments have taken place.

The resourcing of both NIEA and DARD in terms of staff and expert knowledge must also be considered in relation to this issue. Communication and spread of knowledge about Invasive Species, Biodiversity and diseases must flow and be cemented both within and between all divisions of DARD: forestry, farming and fishing; and the flow and acceptance of expert knowledge from NIEA must be facilitated and respected in a concrete manner by DARD and its officials, as well as DCAL in terms of inland fishery responsibilities and riparian habitats.

Is mise le meas,



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