

**Written Submission by Confor to the Northern Ireland Committee for
Agriculture and Rural Development**

On 26th February 2013

In connection with their Review of

Plant Health & Biosecurity / Tree Disease in Northern Ireland

Introduction

Confor is grateful to the Committee for Agriculture and Rural Development for their invitation and opportunity to address the members on this important issue.

Confor is, first and foremost, a members' organisation, funded by and accountable to people and businesses who own forests and who work in forestry or with wood and forest products. The aim is to support sustainable forestry and low-carbon businesses through promotion of markets for forest products and helping improve members' competitiveness.

Confor's remit covers all parts of the wood supply chain, from nurseries through to forest owners, agents, contractors, harvesters, sawmills and other users of wood.

Confor aims to provide the sector with a strong voice in the market place and in all levels of government - international, UK and local.

The individuals who are appearing in front of the committee are James Hamilton Stubber the current Chairman of Confor in Northern Ireland and Cathal Woods a forest manager with Farmwoodlands Ltd an active woodlands management and advisory company in Northern Ireland.

This paper doesn't answer precisely the specific terms of reference as set out in the briefing letter. However, the majority if not all the issues raised are dealt with in some form within this paper which together with its appendices, sets out Confor's position on Chalara Fraxinea (Ash die-back) whilst also taking account of the other pests and disease (P&D) outbreaks and the actions Confor considers necessary to counter the threat of future incursions of tree diseases.

Submission Summary

- Despite our current systems for the identification of the risk and management of P&D outbreaks being shown to be inadequate, we must look forward and ensure we create a policy and methodology which is effective.
- We need much better direct engagement, cooperation and specifically communication between the private sector and the Department.
- The issue of P&D is a whole of Ireland problem and must be treated as such because any measures put in place will not be effective if there is not a uniform approach.
- All of this has to be put in place in the light of current EU regulations which neither address this issue adequately nor allow unilateral action.
- There has to be a greater focus on how to identify future threats of P&D and the processes required to combat them together with developing resistant plant strains and alternative species.
- Instead of implementing partial or total bans on the import of trees and plants which is likely to be un-implementable politically and practicably, look to introduce more targeted controls on high risk areas and plants.
- Together with the tightening up of plant passports, potentially seek to have all tree planting sourced from locally grown stock.
- Finally, well managed forests and woodland are healthier, are more likely to be monitored for P&D, and promote greater tree resistance to P&D.

1. Background

1.1 The media continues to run with Chalara as a significant story and, for many, the angle is to facilitate criticism and recrimination. Confor has taken the position that what is required is action – resource spent on recrimination is resource not focused on tackling this and other P&D. Confor is more actively engaged with the Forestry Commission and its equivalents across Great Britain on the practical issues around P&D.

1.2 Confor has also spoken with the Woodland Trust, CLA and ICF to propose working together on common proposals for action - the danger being that bodies say different things and lose focus on what needs to be done, and not just for Chalara.

2. Confor's position

2.1 Action not recrimination

Chalara comes on top of existing P&D outbreaks that are stretching the Forest Service and research resources beyond breaking point, and which will have similar impacts on DARD, devolved governments and the private sector. Lessons will need to be learnt to inform action to protect our forestry resource, but the focus now should be put into finding solutions.

2.2 Resources

2.2.1 There is insufficient resource in the Forest Service and research departments now to cope with the outbreaks and therefore ongoing forestry and planting activity will suffer more.

2.2.2 Private owners may not report outbreaks if they believe they will be forced to fell trees at their own expense. We also face the threat of deforestation as there is no requirement to replant. There needs to be financial support to identify outbreaks and to act on them (advice and financial support – if not compensation, then support to replant).

2.3 Guidance

2.3.1 There is a critical need to both develop a clear strategy for dealing with this current outbreak in order to address the many questions being raised, and for that strategy to be effectively communicated to all concerned.

2.3.2 For example, there is a lack of clarity around what to do with mature infected ash trees. Must they be destroyed, how is that done, what happens to the timber, what about local ash trees? Should owners fell ahead of infection, what should they replant with?

2.3.3 How might the disease spread, can it be contained and if so how, do we have the resources to implement an ambitious strategy? Can we identify disease resistant trees?

2.3.4 There are answers, and informed guesses, to some of these however, consistent information and guidance needs to be available to all.

2.4 The bigger picture

2.4.1 Other P&D outbreaks cannot be ignored – see resource point above. The whole issue of how our woodlands are to be protected in the future has to be addressed at the same time. Is there an appetite to put measures in place and how will current EU regulations impact on their effectiveness?

2.4.2 However, none of the above will be effective if this whole issue is not addressed as a problem for the island of Ireland as a whole. With a physical land

border the risk of transmission of all manner of diseases is immeasurably increased. There therefore needs to be an effective and actively resourced cross border body to ensure that there is a consistent approach to the subject of future protection against tree disease.

2.4.3 Northern Ireland could put in place the most stringent plant health measures which would be to no avail if this is not done.

3. Liaison with other organisations

3.1 In Confor's liaison with other organisations we highlighted the cumulative impacts these P&D are having and could potentially have, including:

- Lost trees and devastation to woodland/forests;
- Lost income to support woodland management;
- Damage to landscapes and wildlife;
- Loss of confidence in managing woodland/forests and in establishing new ones;
- Future investment (both in woodlands and processing capacity);
- Nursery viability;
- Diversion of resource away from other forestry activity, meaning that important forestry objectives stall, such as tackling under-management and woodland expansion.

In the paper we shared with the bodies we undertook the following analysis:

3.2 Imports/introductions

3.2.1 The free trade in plant material within the EU is an obvious open door to introductions. However, closing that door is far from simple. There is potential for contamination from non-forest plant material (as seen with *Phytophthora ramorum* on larch and Oak Processionary Moth) which means effective restriction would require action well beyond forest trees. Such action would need to be assessed in light of EU legislation on free trade and current rules on P&D outbreaks. Furthermore, it should not be assumed that this is the only route for P&D to be introduced to the UK.

3.2.2 The UK forest nursery trade has imported or 'grown on' material abroad due, in part, to an inability to plan for demand and from pressure to reduce costs.

3.2.3 The current EU plant health passport for trade in forest trees and plant health legislation is not proving to be fit-for-purpose (it is currently being reviewed). There are suspicions that plant health controls may not be applied rigorously in other EU member states and the decision making process in Brussels needs to be speeded up.

Action required:

- *A pan-sector, public-private group should examine how to grow more (and potentially all) tree material in GB/UK;*

- *While recognising the practical and wider trade implications, Government should consider increased/complete restrictions on imports;*
- *Government and the private sector should work together to drive improvement in EU plant health controls.*

3.3 Resources

3.3.1 Physical and financial resource is required to combat introductions, monitor for outbreaks and then act when outbreaks occur. These resources include suitably trained staff, plus research professionals and Forest Service staff approving felling licenses and management plans.

3.3.2 Resource is also required to investigate, advise and apply new grants policy on species and silviculture in light of P&D outbreaks and threats. In particular, consideration has to be given to what species are suitable for new planting and restocking. There is also a need to raise awareness of P&D threats and of good practice, and to support the provision of advice to owners of infected trees.

3.3.3 Outbreaks also threaten deforestation with Statutory Plant Health Notices providing unconditional licence to fell, ie no requirement to restock. Governments have so far ruled out compensation, but the UK Government has provided a supplement to incentivise restocking and avoid deforestation in the south-west of England, and this model could be rolled out UK-wide.

3.3.4 The private sector has a key role to play in a number of these actions, and needs to be involved in decision making on resource requirements and allocation. It can also help raise awareness and provide additional physical resource (if the funding is available) to top-up or complement public officials.

Summary action points:

- *Governments to work with the private sector to identify and provide the additional staff and financial resource required for awareness raising, monitoring and action when outbreaks occur.*
- *Government to work with the private sector to generate advice on alternative tree species and silviculture.*
- *Government to set up a cross-border liaison body in order to create a uniform whole of Ireland approach to the issue of pests and diseases.*

4. Appendices

Attached as appendices to this submission is firstly Confor's current more detailed list of specific actions with suggested responsibilities and timelines, and secondly the options considered in respect of Import Controls.

Confor

February 2013

**Written Submission by Confor to the Northern Ireland Committee for
Agriculture and Rural Development**

APPENDIX 1

Confor's action plan on pests and diseases

In response to the serious nature of the latest threat to trees in the UK, Chalara ash dieback, Confor has produced an action plan on wider tree pests and diseases.

Actions required	Who to lead	When by
<i>Chalara outbreak:</i>		
1. Establish spread of <i>Chalara</i> and, in consultation with stakeholders, assess options to control further spread	Defra and S/W/NI equivalents	December 2012
2. All public, voluntary and private partners co-ordinate to raise awareness and direct people, quickly and easily, to a single point for information and reporting	Defra and S/W/NI equivalents	December 2012
3. Don't just identify disease resistant trees, but also begin to plan for how we will grow these	Forestry Commission/Forest Service	December 2012
4. Establish a cross border liaison body to co-ordinate strategies to deal with pest and diseases in trees.	All governments	June 2013
<i>Prevention and control of pests/disease:</i>		
5. Introduce a fast-track decision making system when new outbreaks are detected that allows for immediate controls on imports and/or movement restrictions as necessary	UK Government	January 2013
6. Increase resource in Defra (and country equivalents), FERA, Forest Service, Forestry Commission and Forest Research, including scientific research and plant health to prevent the import of pests and diseases	Governments across UK	2013 Budget
7. Assess the risk of further introductions through trade in plants and trees and consult with stakeholders on action – repeat at regular intervals	Defra/DARDNI	Summer 2013
8. Forest Service work with the private sector to advise on alternative tree species, genetic interventions and silviculture	Defra/DARDNI	2013 Budget
<i>Growing and managing woodland to reduce risk</i>		
9. Forest Service (and country equivalents), forest industry and tree nurseries produce plan to grow potentially all trees in GB/UK /Eire	Forestry Commission	January 2013

10. All UK nurseries growing trees to adopt the Confor Nursery Producers Group's traceability scheme which provides customers with clear evidence of where trees were grown	Governments/ buyers of trees	December 2012
11. Consider and adapt the recommendations from the Independent Panel on Forestry in England published in July 2102. Well managed forests and woodland are healthier, are more likely to be monitored for pests/disease, and promote greater tree resistance to pests/disease.	Government	Summer 2013

Further explanation on action points:

1. It is vital that all impacts, both positive and negative, are assessed before any decision is made on control measures and that the extent, scientific understanding of the disease and any effective prevention strategies are assessed comprehensively. Control measures must consider the availability of resource, for example to fell infected trees, and the financial impact on owners. Assessment should also be made of the danger of deforestation from Chalara and support provided to replant felled trees.
2. Include how to identify disease and good practice when visiting/working in woodland and extend this to include all pests/diseases.
3. Evidence in Europe suggests varying degrees of resistance across ash species and varieties. There have been various breeding programs to select for resistance. This is essential work looking forward to replacing lost crops in the UK. Work with specialists including from other non-UK countries, UK nurseries and growers to assess future Ash demands as well as the means and timescale for developing a resistant home grown supply that can be made available.
4. This is an essential element in order to ensure the future protection of trees against disease across the whole of the island of Ireland.
5. A pests and diseases expert group (control outbreak team) needs to be established comprising specialists from UK and devolved Governments; research establishments including plant health experts; industry; land owning and managing parties; as well as any appropriate voluntary groups. This expert group would be called upon urgently whenever there is any suspicion of an outbreak in order to collate and assess relevant information and make decisions on appropriate decisions based on relevant skills, knowledge and experience. This should include assessing the outbreak, any import controls or restrictions to be implemented, containment measures and if feasible eradication actions. The rapid survey conducted by Forest Service and others is to be commended for its swift and effective assessment work and will be an effective mechanism to repeat should future outbreaks occur.
6. Whilst this whole process is being considered, look for short term action on the high risks, for example, associated with importing significant quantities of soil with plants, i.e. only allow imports of bare root plants and trees until appropriate processes are brought in to deal with what we already know to be greater risk material. See expert control outbreak team above. This team should be tasked (now) with identifying and assessing the relative impacts, as well as risks, for vector/host species, all timber/non-timber forest products and any other potential carriers such as soil, vehicles, people or naturally-borne via wind, birds, or wild

animals, for example. This should be used to authoritatively inform what needs to be targeted for any wider import or movement restrictions.

7. Defra should establish a 'look out' team, that regularly assesses threats around the world and then has a suite of protection measures, agreed with stakeholders, that it can impose to protect the UK against introductions. One of the lessons learnt from the Chalara outbreak is that there was an awareness that the disease existed in neighbouring countries, but no organisation took responsibility for communicating that to the forestry, land-owning and nursery sectors and taking action to reduce the risk of introduction and promoting awareness so that infected sites could be identified early. There is a lot we can learn from Europe and Defra/scientists should be encouraged to review further the knowledge already out there.
8. Genetic interventions are where use is made of varieties of host plants that are either more tolerant to damage or less palatable to the pest and this needs to be investigated along with species choice and silvicultural practises to prevent and reduce risks to UK forestry from pests and diseases.
9. We must address problems of the unpredictability of grant schemes and facilitate contract growing. Grant schemes need to provide predictability and enable more contract growing where the customer specifies in which future year they need the trees. We must provide confidence to nurseries to invest and increase production. Some nurseries would need to purchase additional land. This is a significant investment, and they would have to feel confident that they could make a return on this investment. Furthermore, larger nurseries growing more trees results in potentially bigger risks. Forest Service should check availability of UK/Irish trees before approving the planting of less common species or provenances. There should be quarantine measures for all imported plants, appropriate to the pests and/or diseases which that plant can carry.
10. Distribute and encourage sign up. Is there scope to use a carrot and stick approach whereby it is a condition of forestry grant aid that only trees supplied from a nursery that has adopted Confor's Nursery Producers Group traceability scheme will receive funds?
11. Despite the report having been prepared for forestry in England, it has many attributes from which woodlands in Northern Ireland could benefit. Encourage Minister to consider ways in which the recommendations could be adapted for Northern Ireland.

**Written Submission by Confor to the Northern Ireland Committee for
Agriculture and Rural Development**

APPENDIX 2

IMPORT CONTROL OPTIONS

Context:

- Pests and diseases come in through various 'pathways' – airborne, animal/bird, vehicle movements, soils etc. An import ban would not prevent new outbreaks;
- An import ban would result in challenges under EU and WTO rules, with possible retaliatory measures and prosecutions;
- A blanket ban does not differentiate between low and high risk trade. As it would not be based on any assessment of risk it would add to dangers from the previous point;
- A ban would impact on current and planned planting/restocking activity, destroying jobs and undermining businesses. It would also leave Government open to further legal action;
- The nursery trade need a few years to ramp up production to match demand.

Introduction

One of the actions that could be promoted is a control on imports of trees and plants to limit future pests and disease outbreaks. An import ban or controls will have consequences. For example, in the case of an immediate ban, there will be significant impacts on current planting and restocking activity.

Prevention consists of tactics designed to either reduce the probability of the occurrence of a pest or disease, or to create environmental conditions inhospitable for its build up into damaging numbers. Regulatory, cultural or genetic tactics are examples of prevention strategies. It is clear that, in the case of *Chalara*, regulation requires to be the way forward as we are too late for cultural (where you create conditions inhospitable for the development of damaging numbers of pests and disease) or genetic interventions (where you make use of varieties of host plants that are either more tolerant to damage or less palatable to the pest) as Ash dieback is already present in and across GB. There is also a need for direct control and/or suppression of existing pests and diseases that have an adverse impact as there are now a number of pests and diseases in the UK that are the subject of intense management.

Options

A number of options related to import controls are proposed below with brief commentary on impacts and how achievable these may be. They could be used independently or in a combination and this could change over time.

1. **Status quo;**

Achievable, as this is what is currently happening, though there are resourcing issues e.g. sanitation fellings, disposal of infected stock, surveys, etc, as well as lost income and value of affected trees. **As a crude initial step this may be better than doing nothing, however more appropriate options exist.**

2. **Ban on import of all plants;**

This is likely to be extremely challenging to achieve given the volume of movements into the UK by sea, air, road and rail via numerous entry points, the scale of trade in plant material (and resultant impact on businesses of a ban) and the consequences of breaching EU/WTO rules. This would be a major threat to some businesses unless there was a reasonable, say five year, lead in time. If the pest or disease can be transmitted by another carrier, or can be transmitted by wild mammals or birds, or is air-borne, import bans of any type are likely to be ineffective, though they may slow down any rate of spread. It is known that some ash species show very few symptoms after infection so may act as undetected carriers. **Not recommended or supported by Confor.**

3. **Ban on import of all trees;**

This would be challenging to achieve for the same reasons given at 2. above. Furthermore, it does not discriminate between high and low-risk trade and, unless nurseries have had the opportunity to ramp up production, will mean cancelled planting and restocking activity, damaging jobs and opening government up to further legal action. A clear definition for a 'tree' would be required that can consistently be applied with borders staff able to effectively intercept, identify and appropriately deal with all trees. The same practical implementation issues as for a ban on the import of all plants applies. It does provide a possible opportunity for nurseries, though one to develop over years rather than achieve overnight, and it will be limited unless predictability of demand, driven by grant schemes, is significantly improved. **This would be most unlikely to achieve any net benefit due to the many other carriers and is not recommended or supported.**

4. **Targeted bans/controls on high risk imports; and**

Most realistic to achieve as and when it is possible to clarify what is 'high risk' and if able to target and control the high risk imports effectively. Limited impact on forestry activity and jobs, and provides similar opportunity for nurseries as 3. above. **This approach to imports is recommended though will require careful management, clear effective communications and constant monitoring. It would also enable targeting as appropriate e.g. regarding *Castanea* from Northern France this year.**

5. **Treatment at point of entry.**

If a solution for the treatment and/or prevention of infection is known then there may be no need for import controls if an effective treatment would be sufficient. However, would any such product have the required approvals and if not how could this be expedited competently and rapidly? If this can be done then treatment at point of import could be achievable with sufficient resourcing. However as there is such a wide range of plant material imported and all parts of the plant would require thorough treatment e.g. roots, any potting material, bark leaves etc it would be extremely unlikely to be practical. **The successful practical implementation and achievement of this is extremely doubtful and therefore this option is not favoured.**

Conclusion

Future bans and/or import controls should be targeted on high risks imports. A pre-requisite is that a comprehensive assessment of the risk of further harmful pest and/or disease introductions through trade in plants and trees is urgently required. This requires consultation with stakeholders on action and that needs to be re-assessed and repeated at regular intervals. It is vital that all impacts, both positive and negative, are assessed before any decision is made on ban and/or control measures and that the extent, scientific understanding of the disease and any effective prevention strategies are assessed comprehensively by relevant specialists. Control measures or bans must consider the availability of adequate resourcing for comprehensive and if need be sustained implementation. For example plant health control, knowledge and capacity.

Confor
February 2013