



## ***Woodland Trust Written Submission to the Committee for Agriculture and Rural Development's Thematic review of Tree Diseases***

### **Introduction**

The Woodland Trust welcomes the Committee's very topical review into plant health and biosecurity and is very grateful for the opportunity to present both written and oral evidence to this important inquiry. Our response covers the broad areas of the Committee's review, including: the legislative framework for Plant health; roles and responsibilities of DARD and Forest Service in both tackling tree disease and their relationships with relevant stakeholders, and finally, Tree Health contingency planning.

The Trust owns and manages over 50 Sites in Northern Ireland as part of our 1200 site estate across the UK. The organisation is represented on the UK Biosecurity Programme Board and Chalara Fraxinea Outbreak Management Team. Where referenced, views in this response draw on published evidence; otherwise they are based on our experience as a woodland owner and manager, and stakeholder in plant health matters.

### **Overview of evidence submitted**

- The Chalara crisis has sadly demonstrated that current systems and protocols (at NI Level, UK Level and EU level) are inadequate to prevent the importation of new pests and diseases that pose major threats to trees and forests in Northern Ireland.
- There are no clear protocols over ensuring appropriate stakeholder involvement in outbreak management teams, and a certain lack of accountability and clarity over lines of responsibility. Stakeholder support would have meant that urgent surveying of suspected sites could have been much further advanced before the winter leaf loss which has halted the process.
- We remain concerned that plans to proactively tackle tree disease are weak and share concerns, previously highlighted by the Committee, that Forest Service has not completed a Risk Assessment on the impact of Ash Dieback to inform their response.
- Improvements could be made in Northern Ireland and wider UK systems, but the issue also needs addressing at EU and international level, where the presumption in favour of trade and inadequate assessment of wider social, environmental and economic costs are real barriers. It is not clear how far the EU Plant Health Regime review currently underway will be able to resolve these issues. The current system places unfair burdens on landowners and managers in terms of dealing with outbreaks.

## Detailed evidence

### 1) The legislative background on plant health and tree diseases at EU, national and regional level

The arrival of *Chalara* on imported stock in Northern Ireland shows that current systems are inadequate. A key problem is that international protocols begin with assumptions favouring free trade, rather than minimising risks to biodiversity. Regulation is through known harmful organisms exempted from this presumption, but Brasier, (2008) sets out the flaws in this system. Diseases are often caused by previously unknown organisms, to which the regulations do not apply. Lists focus on organisms threatening commercial forestry and agricultural crops, rather than looking at social and biodiversity impacts. Countries are allowed to use different standards and methods of inspecting products. There is evidence of breaches of protocol by some exporting countries. These can only be picked up by surveillance in the importing country which relies on visual inspections, usually of a sample, and unable to pick up micro-organisms in soil.

Within the EU there is free movement of plant material between countries except for the most serious “quarantine” pests, for which plant passports are required for the host material. Border checks are not carried out. Where material is imported into the UK from outside the EU, but via another EU country, we are reliant on the EU ‘transit’ country carrying out adequate checks, yet there is currently no standardisation of surveillance within the EU. The issue of material being moved between countries within the EU to be grown on, or being “rebadged” as of EU origin, is of concern. We welcome the fact that the UK Secretary of State, Rt Hon Owen Paterson MP, has raised questions over the issue of free trade of plants within Europe.

While there is a system for recording and notifying buyers of trees as to the provenance of the seed there is no statutory system to allow buyers to see where those trees have been grown and how many nurseries have handled them. Some landowners may thus have unwittingly contributed to the import of *Chalara* to the UK. A “traceability” system should be put in place across the nursery/horticultural sector to tackle this.

While some of these issues may be addressed through the EU Plant Health Review early in 2013, the EU is still limited by higher level international trade agreements.

A key problem is unbalanced evaluation of costs. While the international systems around plant health aim not to restrict trade and therefore economic activity, there is no comparable evaluation of the costs – social, economic and environmental – of harmful organisms becoming established, and as a result no true holding to account of those responsible for breaches of biosecurity. Plant health has in the past focused particularly on commercial interests (forestry and agriculture) and there needs to be much greater recognition of the impact of pests and diseases on biodiversity, and the resultant effect on delivery of ecosystem services.

## **2) The contingency plans for tackling tree disease in Northern Ireland in general and ash die back in particular**

DARD and the Agri-Food and Biosciences Institute jointly published their latest Contingency Plan for Serious Pest/Plant Health in March 2012. Whilst this aims to ensure that all incidents of non-indigenous plant pest or disease are managed consistently and promptly, we have a general concern, which we believe is also shared by Committee Members, that this needs to be complemented by a more specific Risk Assessment or Control Plan which focuses on Ash Dieback.

Forest Service Officials conceded, when providing verbal evidence to the Committee on 20 November that a Risk Assessment was in development, only to be halted by the appearance of the disease. This issue also arose again during the evidence session on 13 January, where Officials indicated that they were in the process of developing an “*all-Ireland control plan*”. Forest Service needs to finalise this as a matter of urgency if we are to effectively tackle the disease.

As an aside, the Contingency Plan makes no reference to the need to be underpinned by Risk Assessments, or who retains responsibility for producing these (i.e. Forest Service, DARD or the Incident Management Team). We feel this needs to be much clearer if the plan is to be effective.

The *Serious Pest/Plant Health Contingency Plan* refers to the role of Incident Management Teams; we have a couple of concerns about their role. Firstly, there is no stipulation that there should be representation of conservation or biodiversity interests within these teams, who could bring specialist knowledge to improve the capacity of the response. Our second concern is that, unlike in GB, the process does not allow for stakeholder involvement. Instead, there is provision for regular updates to stakeholders, which whilst welcome, it does not facilitate the two way flow of information that is needed when rapid response is required.

## **3) The relationships between DARD and Forest Service and other relevant stakeholders in the public, private sector including NGO's**

Whilst we have tried to cultivate an effective working relationship, we remain concerned that offers of assistance, by both the Woodland Trust and National Trust, to support the urgent surveying of suspected sites was turned down by Forest Service.

This rejection was on the grounds that we did not have legal permission to work on the Forest Service estate or perhaps powers of entry to private woodland, a rather surprising response given we have carried out survey on the estate private land for production of the Ancient Woodland Inventory, and for the Ancient Tree Hunt in the past.



Whilst good progress has been made to survey over 800 sites to date, we feel that our involvement would have ensured that the urgent surveying work could have been completed in advance of the seasonal changes which have now halted the process.

#### **4) Planning and policies in place to identify and prevent future tree diseases in Northern Ireland**

Both Tree and Plant Health needs to be a much greater policy priority than it currently is with the Executive, DARD and the Forest Service. The Forest Service Business Plan includes only four cursory references to tackling tree disease, whilst the last Annual Report includes just one. Our biggest concern is the lack of detail on research and analysis and the lack of a proactive approach to tackling disease before it takes hold – including incomplete Risk Assessments.

Our experience of the UK and Europe is that Research does not become a priority until a disease becomes a problem, by which time the time to explore options such as genetic research and plant breeding may be limited. Response to pests and diseases must also include building resilience through conservation, restoration and expansion of natural habitats as set out in the Lawton review, and in the cross-sectoral State of the UK's Forests report (Woodland Trust, 2011), which highlights the need for diversity in forests and landscapes.

#### **5) The Woodland Trust Three Point Plan for Tackling Tree Disease**

On 7 November 2012, we published our three point plan which aimed to tackle not just the immediate threat of Chalara Fraxinea to Ash but to help us to safeguard the conservation benefits of UK trees and woods in the face of an unprecedented wave of pests and diseases.

##### **1. Bringing scientists and the public together to monitor and protect the UK's trees and woods**

Together with the Forestry Commission, the Food and Environment Research Agency, and the National Trust, the Woodland Trust has submitted a bid for funding to the EU LIFE fund (total value £2.5m) for a five-year project to enable tree health scientists to greatly extend their reach and knowledge of the health of the UK's trees. By enlisting and supporting members of the public to become citizen scientists, we will be able to monitor and report on the health of trees across the UK, providing a comprehensive early warning system for tree pests and diseases. Given the urgency of the current tree health crisis, we can't afford to wait for the EU bidding process to run its course and we are in discussions with UK Government to close the one million pound funding gap and implement this project as soon as possible.

##### **2. Growing our own**

Our bold vision of doubling native woodland cover involves us buying hundreds of thousands of trees every year to plant on our own estate or to give or sell to others. Recent events have shown that we cannot have confidence in current supply chain processes. We intend to

ensure that we can have 100% confidence that we plant only trees that are truly UK grown and are disease free. We will invest in UK tree nurseries, working closely with them over a long period of time to produce the trees we need, trees in which we can have 100% confidence. In parallel we will support, and/or invest in community and local tree nurseries to help to ensure that new tree planting is truly rooted in the community.

### 3. Learning Together

The Woodland Trust will host a major conference to discuss knowledge, issues and impact of ash disease and wider tree health risks on conservation, with input from international specialists.

We are fully supportive of the NI Agriculture and Rural Development Committee's Plan to hold a specialist seminar on 19 February 2013, which aims to spread knowledge and understanding of Tree and Plant disease, and we very much welcome the invitation we received to address this event.

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