

**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.

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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
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