



**National  
Trust**

# Committee for Agriculture and Rural Development

## **Review of Tree Diseases**

Written submission from the National Trust

The National Trust welcomes the Committee's review and the opportunity to present both oral and written evidence. Plant and tree health is vitally important to us as a conservation charity. Across the UK we are custodians of over 200 gardens and parks, manager of over 25,500 ha of woodland, and a major retailer and purchaser of plants. We estimate that we have more ash trees on our land across Northern Ireland, England and Wales than any other organisation in Europe, and we are therefore particularly concerned by ash dieback (*Chalara fraxinea*).

In Northern Ireland the National Trust protects and provides access to 15 major estates and gardens, 1/3 of the N.I coastline, over 4,000 ha farmland and 1000 ha woodland. We employ 470 staff and attract well over a million visits to our sites annually. Plant diseases have the potential to have a significant impact on our gardens, parks and woods - irreversibly changing many of the beautiful landscapes we protect. *Chalara* is a major threat. However it is vitally important to highlight the unique opportunity that exists for Ireland as we do not currently have *Chalara* within the natural environment.

The spread of ash dieback has revealed many deficiencies in the plant health regime, bio-security and research protocols to prevent importation of pests and diseases which threaten woodland habitats in the UK. We commend the swift action taken in Northern Ireland by the Forest Service and DARD in the trace forward surveys, their decisive action to follow the enforced destruction of diseased trees and the planting ban on ash.

### **Our key recommendations**

- 1) Invest in and develop local nursery capacity to meet the demand for broadleaved trees in N. Ireland.
- 2) Significantly strengthen importation protocols for trees and plants by implementing pre-import notification measures announced by DEFRA on 17<sup>th</sup> Jan 2013, with enhanced protocols specific to N. Ireland.
- 3) Improve import and inspection controls in collaboration with international partners, and ensure all relevant plant materials are covered
- 4) Strengthen the plant passport scheme and labelling to ensure certainty of provenance and importantly to identify where the trees have been grown.
- 5) Proactively plan for plant disease as opposed to relying on reactive control. A programme of plant health research and horizon scanning based on strong international collaboration should be considered.
- 5) Improve stakeholder engagement to mobilise resources from partners.
- 6) Develop an all-Ireland *Chalara* Control Plan identifying a programme of work & surveillance that will keep *Chalara* out of the natural environment

Our evidence is mainly focused on the questions raised in the Terms of Reference by the committee. However we emphasise the unique opportunity that exists for Ireland as we do not currently have Chalara within the natural environment:

1. The legislative background on plant health & tree diseases at EU, national and regional level
2. Roles and responsibilities of DARD & Forest Service in tackling the disease
3. Relationships within DARD and stakeholders
4. Planning to identify and control future diseases
5. Bio-security at ports and airports
6. Chalara in Ireland

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

The arrival of Chalara on trees imported into Northern Ireland demonstrates that European plant health regimes are not capable of addressing transference of diseases. Chalara has been present in Europe since 1992 and has advanced westwards over the past 2 decades.

The current protocols favour free trade over biodiversity threats, as they rely on regulation of known pests and diseases. Unfortunately many of the destructive pests and diseases which we are now encountering are not known and therefore are not regulated for. Hence the delay in responding to the deaths of huge numbers of trees across Europe since 1992 while the causal agent was clarified. Authorities must be empowered to take action based on habitat loss and disease symptoms - this could take the form of temporary measures to minimize the risk whilst the casual agent is identified.

There is significant bureaucracy associated with the European plant health regime and plant passports in particular, however, as highlighted this has wholly failed to stop Chalara. For example, the Polish Forest Service admitted that it stopped buying ash transplants from Polish nurseries it knew were infected over 8 years ago, but these nurseries were still growing on trees and sending them back (infected) to the UK.

There are weaknesses in the control of international imports through an EU country to the UK. The first EU country which receives the plants is responsible for completing plant health checks – however there is no standardized system of checks. Many pests are not always immediately evident and require a period of time to become obvious – for example the Asian Longhorn Beetle.

Finally use of the term 'provenance' is deeply problematic. It refers only to where the seed was collected. This often bears no relation to where the tree has been grown and provides no information on how many nurseries have handled it (increasing the risk of infection at each stage). The National Trust's experience with the Runkerry planting is an example of the provenance labelling shortcoming. On the planting contract we had specified UK provenance trees. The seeds may have been collected in the UK, however the trees were grown in Europe and supplied to the Trust infected. As a buyer we were not made aware that the trees had been grown in Europe. Buyers need a chain of custody approach similar to that for FSC wood products to be confident that they are planting trees which are not carrying pests and diseases.

## **2. Roles and responsibilities of DARD & Forest Service in tackling the disease**

DARD and Forest Service are to be commended for their swift reaction to Chalara in Northern Ireland. This action will hopefully prevent the disease from transferring to mature woods, ancient trees and hedgerows. The potential damage to landscapes, habitats and the wood industry is significant. We fully support and recommend continuing with the enforced destruction action on infected sites. This will keep inoculum levels low, minimise transference and give us a huge opportunity to keep Ireland disease free.

Modelling work at Cambridge University has indicated that there is a possibility of wind dispersal from Great Britain. However, taking into account prevailing wind direction and factors related to spore travel, the risk is very small when compared to the risk posed by importing contaminated planting stock or not destroying infected trees.

Forest Service's approach of assisting landowners with the actual removal of trees is welcome, however, outside of this landowners are not being compensated for losses. We would encourage the Department to consider this option – we are the least wooded part of Europe and there is a real risk that Chalara will further reduce planting numbers that are currently well below target.

The trace forward surveying of sites is also to be welcomed. Latest figures indicate that in the region of 800 sites have been surveyed and that the Forest Service has inspected all Woodland Grant Scheme sites planted in the past 5 years. This survey was completed by mobilising professional grade foresters in a short space of time. This action has not been matched by the Forestry Commission in GB and demonstrates DARD and Forest Service's commitment to containing this disease.

However we are anxious to see how this approach will be sustained and what the surveillance plans are for 2013. How will the risk be managed into the future? Plans must be put in place to ensure a continued high level of alert while safeguarding the ongoing operation of the Forest Service.

The AFBI/DARD Contingency Plan (April 2012) highlights management protocols to deal with generic non indigenous pests and diseases. This provides a good framework to deal with issues - we would like to see specific pest/disease risk assessments emerge from this Plan.

The Incident Management Team roles/responsibilities are clearly defined; however the IMT does not include a representative from NIEA which would be beneficial when considering the environment/habitat risks.

Overall the response actions of DARD/Forest Service have been well executed and have controlled the disease to date. An All Ireland Chalara Control Plan for future actions would move the programme to a proactive approach.

### **3. Relationships with DARD and Stakeholders**

Communication between DARD and stakeholder groups has mainly been through a range of group meetings running on a regular basis. These meetings have provided the opportunity for both dissemination of information from DARD and communicating views from the stakeholder group. The Stakeholder group has widened to include councils, Roads Service, Water Service and contractors – this represents a significant improvement over the ramorum group.

Whilst information sharing has been vital, so far the Department has missed the opportunity to enable stakeholders to bring actual resources to the table. For example, the National Trust views ash dieback as a huge risk. We have a range of staff at our properties that are capable of, and have been, surveying our sites for the disease. Our teams could have reduced the burden for DARD/Forest Service by covering National Trust sites. In addition to paid staff we have access to volunteers and relationships within the voluntary sector which could have further reduced the pressure on the Department.

The Trust also has a strong membership base in N. Ireland who we can rally and influence – nearly 60,000 people. We have a million visits to our properties a year which gives us a significant opportunity to communicate with large numbers of people.

#### **4. Planning to identify and control future diseases**

The presence of Chalara in the UK demonstrates a complete lack of planning and horizon scanning for threats. The disease has been rampant in Europe since 1992 yet trees were still being imported in 2012. It appears that a reaction only occurs when a disease lands on our shores even when it is advancing westwards in a systematic pattern.

In Northern Ireland and the Republic of Ireland we have a time-bound opportunity to halt Chalara. It is not in the natural environment and the inoculum levels are considered low. Our understanding is that Northern Ireland can be considered a Pest Free Zone as we are containing the disease. We urge DARD to clarify this position as it may provide the opportunity to extend the importation ban. This should be done in unison with authorities in ROI.

#### **5. Bio-security at ports and airports**

The current plant health regime is flawed because import inspections only look for a limited number of known organisms, and are not structured to identify any new threats. We recognise that large consignments of plants or plant material are often only inspected at UK points of destination, and even then only 2% of the whole consignment is inspected. Given the enormous risk from international trade in biomass and hard landscape materials it is vital that these are brought within the inspection regime.

We believe that more rigorous inspection at origin/source may prove a better and more cost effective option than trying to detect at point of entry. This will require establishing clear inspection procedures (3<sup>rd</sup> party) that must be enforced and more robust evidence provided before entry into EU. Introducing quarantine at source may also be a more effective and practical solution. Increasing quarantine times at destination may also be helpful, especially when combined with a more robust series of bio-security measures at these destination points.

We also recommend that DARD adopt the pre arrival notification approach that has been enforced in mainland GB. This would provide the Department with the opportunity to plan and monitor imports more effectively.

However the wider issue remains the lack of standardized controls for plant importation within and outside EU. Plants have been traded for centuries - without such exchange many of our most special gardens, like Mount Stewart and Rowallane, would not exist. However new challenges face us now which threaten these unique places. It is clear we need an efficient and effective

system of plant passports and controls which are standardized and entirely traceable.

Finally, to ensure that the full range of vectors for plant disease are covered it is our view that the Plant Passport system should extend to include all plants. We also strongly support the introduction of a single fully harmonised labelling system that is applicable to all plants and plant products.

## **6 Chalara in Ireland**

We have an opportunity within Ireland to control and halt Chalara – an opportunity which is now largely lost in Britain as the disease has become widely established within the natural environment. It may be that the disease is currently undetected in mature woodlands in Ireland and if this is the case then robust detection and control must be swiftly applied. However, working on the basis that it has not become established we now need to seize the opportunity by:

- Continuing with enforced destruction
- Developing an all-Ireland Control Plan outlining key responsibilities
- Developing sustainable production of broadleaved trees in Ireland
- Considering options for re-routing RDP WGS funding towards nursery development
- Leading research ahead of FERA / GB agencies with European and international partners to understand transference of the disease and genetic immunity/ resistance of trees.

### **Conclusion**

We warmly welcome the Committee's decision to undertake this review. We hope these comments are helpful and we look forward to the opportunity to discuss these issues in further detail with the Committee and would be happy to host the Committee at one of our sites.

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## **Annex A The UK implications of ash dieback for the National Trust**



A) The National Trust is a leading conservation charity, with a core purpose of protecting special places, for everyone, forever. The land we own extends to over 270,000 ha of countryside and includes 25,500 ha of woodland. Our open spaces are highly valued and attract more than 100 million visits per year. We are also responsible for many hundreds of gardens and parks of historic or cultural significance, as well a diversity of landscapes rich in their diversity of wildlife.

B) This scale of ownership means that the National Trust is major enterprise, with a turnover close to £500 million, some 5,500 employees, over 60,000 volunteers and a membership of c. 4 million. We typically harvest and market 15,000 – 20,000 cubic metres of timber and woodfuel each year from our woodland, with an increasing amount used as woodfuel in the many boilers we have installed in our properties.

C) The National Trust also retails plants through plant stalls at National Trust properties, and we also propagate some plants for use in our own gardens, woodlands and landscapes as well as for retail sale. In response to the threat from *Phytophthora* to our garden plant collections we recently established our own plant conservation centre to safeguard plant collections and our genetic assets.

D) The health of plants and trees is thus fundamentally important to our charitable purposes, our commercial enterprises and our conservation work. We therefore have a very strong interest in plant health policy, controls and practices, and considerable experience of working within the plant health regime. As a reflection of the importance of the issue to us several years ago we appointed our own in-house plant health specialist.

E) The most recent tree health issues we have faced are *Phytophthora*, acute oak decline and ash dieback. We estimate that dealing with *Phytophthora* alone has cost the Trust around £1million pounds over the last five years. If ash dieback is allowed to spread across the country we anticipate the following main impacts:

- Loss of an important component of our native woodland, and we estimate constitutes around a quarter of the canopy of the 25,000 ha of woodland we own
- Threat to the thousands of ancient ash trees in our parkland, woodland and wider estate, which are historic features, natural sculptures, rich wildlife habitats and refuges for many rare species.
- Loss of the hundreds of thousands of hedgerow and field trees, giving irreversible change in many landscapes where ash is a characteristic feature
- Reduction in the growth of ash timber of around 20,000 cubic metres per annum from our woodland.
- A huge increase in tree surgery needed to ensure public safety.
- Major investment in replanting to replace lost ash trees in gardens, parkland, hedgerows and in woodland.

F) We cannot put a figure on the environmental and heritage cost of losing our ash trees. But we have made an initial estimate of the economic costs of managing this disease. These calculations indicate a figure of £1.5m per annum, recurring for at least the next ten years. This would total £15million, and finding this funding will mean reducing other conservation work and acquisitions by the Trust. We are very aware that if the plant health regime had been more robust this devastating cost would have been avoided.

## Annex B. Chalara outbreak & Planting Figures UK & Ireland

### B.1 Ash Dieback outbreaks in UK and Ireland

Area	Nursery	New Planting	Wider environment	Other	Total
Scotland	2	30	8	0	40
England	16	110	166	0	292
Wales	1	13	0	0	14
N.Ireland	0	23	0	0	23
R.O.I	6	15	0	1 - garden	22
	25	191	174	1	391

### B. 2 Estimated areas of Forest Service and grant-aided new native woodland by priority woodland type 2006 – 2012

Year*	Forest Service areas (ha)				Grant-aided areas (ha)				Grand Total (ha)
	Oak	Mixed Ash	Wet woodland	All	Oak	Mixed Ash	Wet woodland	All	
2006	18	14	27	59	63	76	1	140	199
2007	7	8	13	28	24	57	5	86	114
2008	2	2	9	13	39	20	1	60	73
2009	4	0	0	4	44	80	11	135	139
2010	2	0	0	2	32	105	3	140	142
2011	2	6	2	10	53	149	21	223	233
2012	0	17	0	17	47	148	0	195	212
2006-2010	33	24	49	106	202	338	21	561	667
2011-2015	2	23	2	27	100	297	21	418	445

### B. 3 – Estimated number of ash trees planted 2006 – 15 N.Ireland

Mixed ash woodland estimated at 35% - 45% ash at 2500 total trees per ha = 1000 ash (40%) trees/ha

Estimated planting numbers Forest Service 2006 – 2015 (24ha & 23ha) = 47000 ash trees

Estimated planting numbers private woodlands 2006-2015 = (338 ha & 297 ha) = 635,000 ash trees

**Total estimated ash trees planted 2006-2015 = 635,000+47,000 = 682, 000**



