

**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