



Notes from a Meeting to discuss The use of Asulam for Bracken Control in 2020

Attendance

Defra hosted a meeting to discuss the use of Asulam for bracken control during 2020, in York, on Friday 21st February. Simon Thorp and Roy Brown represented the Bracken Control Group (BCG) and the other attendees were: Sarah Hugo (Defra); Alastair Burn, Steve Clarke (by phone), (Natural England); Don Pendergrast (by phone), Nicola Geering, (UPL); Adrian Dixon, Barry Neill, (Chemicals Regulation Division (CRD) of HSE).

Purpose

The aim of the meeting was to consider the concerns expressed by the bracken control industry about the restrictions proposed in the draft Emergency Authorisation (EA) approval (the details of this are on the [BCG website](#)). The concerns were supported by additional information that has come to light since the EA application was submitted in July 2019.

Concerns

In summary, the main areas of concern relate to:

- The removal of the approval to apply Asulam from ground-based equipment (hand-held or vehicle mounted); approval will be granted for application from a helicopter only.
- The suggestion that Amidosulfuron products can be used in place of Asulam for ground-based chemical control of bracken.
 - Data from the National Bracken Trials carried out by Prof Roy Brown, indicate that the risks associated with the use of Amidosulfuron may be higher than known risks associated with the use of Asulam (see below).
- For aerial spraying, an increase in the width of the no-spray buffer zone from 50m to 90m.
- The level of information required to support future EA applications.

Additional EA Application

CRD will be willing to consider new evidence that supports the concerns raised about bracken control and asked that this be presented in the form of an additional EA application.

- The application will be prepared during March and submitted to CRD in early April.
- A significant amount of evidence needs to be drawn together from a range of people and therefore it will not be possible to submit this any earlier.

The application will be reviewed by CRD and if the content justifies it, details will be submitted to the Expert Committee on Pesticides (ECP). It is hoped that the ECP will consider the application by correspondence, as this will remove the need to wait for the next ECP meeting. After the review, if the ECP agrees that a change to the current proposals are required, a recommendation will be sent to the Defra Minister with responsibility for pesticides (Victoria Prentis MP) for a decision.

The Bracken Control Group

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Ministerial Letter

It is proposed to send a letter to the Defra Minister, in advance of submitting the additional EA application, to explain the situation. Consideration will be given to copying this letter to Ministers in Scotland, Wales and Northern Ireland.

Caveat

The BCG is grateful for CRD's agreement to consider an additional EA application, but it is recognised that there can be no guarantee that this will result in any changes to the bracken control regime outlined in the draft EA approval.

BCG Priority

The priority for the BCG is to reinstate the use of ground-based application of Asulam. This will allow a greater area of bracken to be controlled and provide a way to carry out secondary, chemical treatment (follow up) after primary treatment by helicopter or ground-based equipment.

However, the impact of the increase in the width of the buffer zone is likely to have a significant impact on aerial spray programmes.

- Feedback from landowners and land managers about the level of impact will be included in the additional EA application.
- In the longer-term, it is anticipated that there will be scope for further discussion with CRD about drift rates from aerial spraying operations and safe working practices.

Use of Amidosulfuron

In summary, the known characteristics about Amidosulfuron products are:

Positive	Negative
Provides effective control of bracken	Impact on soil mesofauna ¹ is of concern.
Low level of impact on non-target species	More information required on the impact on non-target species.
	Lack of information about tolerance of trees to being over sprayed.
	Persistence: impact can still occur several years after application.

Following a review of the available evidence, it is likely that Natural England, and possibly the other UK conservation agencies, will issue a statement that consent will not be granted to use Amidosulfuron to control bracken on designated sites.

The BCG is not against the use of another chemical control product. If another product can be identified, which can be applied safely and effectively, it would add to the choice available to landowners and managers for the control of bracken.

However, from what is known about Amidosulfuron products at present, these do not provide an alternative that is generally acceptable, although these products may have a role in special circumstances where there is a low risk from their use.

¹ **Soil Mesofauna** are invertebrates between 0.1mm and 2mm in size, which live in the soil in a leaf litter layer on the soil surface. They feed on a wide range of materials including other soil animals, microorganisms, animal material, live or decaying plant material, fungi, algae, lichen, spores, and pollen.

Therefore, the BCG would like to see the reinstatement of Asulam for ground-based application.

Agri-environment Schemes

Many agri-environment schemes, which have already been agreed, include some bracken control.

The proposed restrictions are likely to have a significant impact of the ability of landowners and land managers to meet the commitments agreed to in these schemes.

In conjunction with the other UK conservation agencies, Natural England will assess the level of impact and details will be submitted as part of the additional EA application.

Seminar

A suggestion came from discussions after the meeting that the BCG could host a seminar / workshop to review the way forward for bracken control. If this is agreed, the best time to hold this might be before the start of the chemical, bracken control season on 1st July.

This would provide an opportunity to consider how the latest restrictions can be best applied and the development of a longer-term strategy for bracken control.

An aim for this meeting would be to demonstrate how the bracken control industry can work to develop safe and effective ways to control bracken by all methods, not just chemical control. The seminar could serve to boost confidence in the ability of the industry to adopt safe working practices, apply appropriate controls and provide adequate records of chemical use and the areas of bracken controlled.

Next Newsletter

Another newsletter will be issued when there are any further developments.

Additional information:

[Bracken Control website](#)

[Bracken Briefings](#): these are a series of short briefings that have been prepared to summarise the current situation.