



Minutes
of the
Bracken Control Group meeting
held at
Aldby Park, Buttercrambe, York
on
Tuesday, 16th September 2014

1 Welcome and Introduction

- 1.1 George Winn-Darley was thanked for hosting the meeting at Aldby Park.
- 1.2 A list of attendees is at Appendix 1. There had been some changes from the list circulated with the Agenda:
- 1.2.1 Oliver Combe represented Confor and the Forestry Commission
- 1.2.2 Alastair Leake and Ian Innes were unable to attend.
- 1.2.3 The Coordinator read an extract from the announcement on the website about the death of Nicholas Hawkings-Byass in March 2014:
He will be sadly missed as an enthusiast for bracken control and as a driving force in the aerial application industry. Without his dogged determination, it is unlikely that the business of aerial application of pesticides and herbicides would have survived recent challenges. Those who continue to use a helicopter to apply asulam are in his debt.
- 1.3 The Coordinator set out the aims for the meeting:
- 1.3.1 Bring together all issues affecting bracken control, including ground-based and physical control methods;
- 1.3.2 Build confidence in the abilities of the bracken control industry to work together;
- 1.3.3 Provide a mandate for the Coordinator to submit the application for an Emergency Authorisation in 2015; and
- 1.3.4 Consider opportunities for future developments, including:
- Alternative products, for example sulphonyl urea products;
 - Different application techniques, or physical control options;
 - Additional research; and
 - Agree an approach to develop effective hand-held application for secondary treatment and primary treatment in woodland.
- 1.4 The Agenda had posed questions and nominated someone to propose a response to each question. It was accepted that a conclusion would not be reached on all (or any) issues, but the aim would be to agree a way forward and the next steps.

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2 Question 2: Asulam

2.1 Draft Application for an Emergency Authorisation for 2015

- 2.1.1 The area of bracken in the UK is difficult to estimate. Support for the statement in the draft application that bracken cover is thought to be increasing should be obtained. Professor Robin Pakeman will be contacted. **Action: Coordinator**
- 2.1.2 This was not a significant enough issue to delay submission of the application.
- 2.1.3 No changes to the Nature conservation section were proposed.
- 2.1.4 Roy Brown had provided an update for the Quantock Hills Study about the impact of sheep ticks and the application will be amended.
- 2.1.5 Further comments were requested by the end of the week (19 September) to allow the application to be submitted the following week.

2.2 Chemicals Regulation Directorate view.

- 2.2.1 As the application had been successful previously, no changes to the format were thought to be necessary.
- 2.2.2 In response to pressure from the EU about the number of EAs being approved by Member States, additional justification may be required in future.
- 2.2.3 It was noted that there are about 270 EAs in Europe. France has approved 120. The UK has about 12.
- 2.2.4 CRD will advise if the Letter of Access provided by UPL in November 2012 needs to be updated. **Action: CRD**

2.3 Update on Asulam registration

- 2.3.1 The application had been submitted in December 2013 and it had been acknowledged in June 2014. A response was expected in about 2.5 years from acknowledgement – about December 2016.
- 2.3.2 Concerns about water quality and avian safety had been answered in the dossier of information provided as part of the application.
- 2.3.3 Initially, an approval would cover ground-based application and further discussions would be required with CRD to extend the authorisation to include aerial application.
- 2.3.4 After registration under the current regulations the product label will need to be revised. It is likely that this will include the ability to use asulam to control docks.
- 2.3.5 Some clues to the progress of the application will be provided by the EU system:
 - May 2015 - the application will appear on the EU system in about.
 - September 2015 – EU Food Standards Agency

2.3.6 The BCG would be advised when the various stages were reached and about any other developments. **Action: UPL**

2.4 Sale of Asulam in 2015

2.4.1 The price of asulam for the 2015 season would be announced by 31 January 2015. **Action: UPL**

2.4.2 Asulam would again be available in 5 litre packs to satisfy the requirements of smaller users.

- It was noted that in 2014, 5 litre packs had accounted for less than 5% of total sales.
- Distributors did not like the small pack sizes due to storage issues.
- There were concerns that small pack sizes could be sold to untrained people.

3 Question 3: Aerial Application of Asulam

3.1 Feedback on the 2014 season

3.1.1 PDG reported that although the season had started off well conditions had deteriorated and overall it had been a difficult season. The other contractors had not experienced the same difficulties in August, but the areas treated were well down on previous levels, and represented the bare minimum for a viable business.

3.1.2 Heli-Lift Services reported that there had been some difficulty with getting approval from Natural England. This had introduced a 2-week delay. Although it was pointed out that this was within the regulatory 21-day response time, Natural England would investigate this with Heli-Lift Services, with a view to avoiding unnecessary delays in future. **Action: Natural England, Heli-Lift Services**

3.2 Threats to the future of aerial spraying

3.2.1 There were not thought to be any specific threats but there are concerns about the tightening of the regulations around aerial application.

3.3 Civil Aviation Authority (CAA) Licensing

3.3.1 Pilots from New Zealand have often been recruited for aerial application work. There are validation issues surrounding the use of non-EU nationals and this is restricting the number of pilots available.

3.3.2 The approach adopted across the EU needs to be harmonised.

3.3.3 PDG has written to the CAA and the BCG would be provided with a copy of the letter to provide background to this issue. **Action: PDG**

3.3.4 It was noted that Robert Goodwill, the MP for Scarborough & Whitby, is also a Parliamentary Under-Secretary in the Department for Transport. He understands the problems associated with bracken on the North York Moors and could be approached if support is required.

4 Secondary treatment of Bracken

4.1 Options for achieving precision spot-treatment

- 4.1.1 Follow up treatment was agreed to be essential. Further overall treatment is a waste of resources and the application of additional chemical should be avoided for reasons of cost as well the risk to the into the environment.
- 4.1.2 The concern of the heritage organisations about secondary treatment using physical techniques was noted. Follow-up using chemical methods was preferred in sensitive heritage areas.
- 4.1.3 A spot-treatment is the best approach but currently the only method of application is by knapsack sprayer at low concentrations. This was not considered to be a viable approach.
- 4.1.4 Data associated with the use of stronger concentrations of asulam (1:7) is available based on 12 years of collection. The efficacy of using spot treatments has been proved.

4.2 Data requirements for asulam in hand-held equipment

- 4.2.1 The CRD position is that 'regulatory acceptable concentrations' must not be exceeded. Additional data is required to allow the risk assessment to be refined.

4.3 Availability of engineering solutions

- 4.3.1 It might be possible to use engineering solutions (e.g. advanced nozzle technology) to satisfy the operator exposure requirements of using different pieces of equipment.
- 4.3.2 Each piece of equipment should be considered individually to consider at what concentration it can meet the operator exposure requirements. This process needs to be repeated for each variant or different design.
- 4.3.3 The aim is to provide at least one method to apply asulam as a spot treatment, or for treating small areas.

4.4 Use of alternative chemicals

- 4.4.1 The introduction of a different chemical (e.g. a product based on Sulphonyl Urea) might provide an alternative approach that could satisfy the operator exposure problems.
- 4.4.2 The value of this approach will depend on the outcome of the bracken trial work to prove that an alternative product offers effective control (See item 6).

4.5 The Bracken Proving Trial

- 4.5.1 Roderick Robinson described his work that had taken place over 12 years to show that total kill of bracken can be achieved using spot-guns after a primary treatment with asulam.

- 4.5.2 In his experience, the same level of kill cannot be achieved using cutting or crushing techniques.
- 4.5.3 The practical phase of this work is complete and it is waiting to be written up. Roderick Robinson is happy to share his findings with UPL and some discussion will take place about how UPL can support the output from this work. **Action: UPL**

5 Agri-Environment Scheme Grants for Bracken Control

- 5.1 In England, options for a new scheme (NELMS) have been submitted to the EU and a response was expected before the end of December 2014. There would only be one scheme but there would be two ways to approach it: by invitation (designated sites), and by a self-service approach - priority would be attached to target areas.
- 5.2 It was likely that the area coverage of the new scheme, currently at about 70%, would reduce to 35-40%.
- 5.3 It is not clear how this change would affect Bracken control, although currently in England 72% of control takes place on designated land, and in Scotland the figure is 38%.
- 5.4 The situation in other parts of the UK was not covered during the meeting and this might be something for the Group to address. **Action: Coordinator, Natural England**
- 5.5 When making the case in favour of bracken control, it was noted the threat to livestock production from expanding areas of bracken should also be mentioned.
- 5.6 In view of the benefits of using asulam on sensitive heritage sites, does this open up another source of funding for developing asulam as a product or bracken control work.

6 Alternative to Asulam

- 6.1 Roy Brown spoke to the paper he had provided ahead of the meeting that outlined the on-going work on the North York Moors.
- 6.2 This work aimed to achieve two main objectives:
 - 6.2.1 Prove the efficacy and safety of application for a range of products;
 - 6.2.2 Assess the impact on non--target species and on the soil.
- 6.3 The work started in 2012 with a range of treatments being applied to trial plots, but the range of treatments did not include aerial application. Monitoring is still continuing to allow a proper assessment of the outcomes to be provided, and the work is being vetted for good experimental practice.
- 6.4 Ideally, the work will provide a second string to asulam with different operator exposure and application issues.

- 6.5 A key issue that remains outstanding is the long-term fate of the chemicals in the environment.
- 6.6 Natural England has been involved throughout and has provided a small grant. More recently, UPL has become involved.
- 6.7 Additional informal sites are being set up near Dumfries, at Sandscale in Cumbria and at Yarner NNR, on the east side of Dartmoor.
- 6.8 Funding for the work has been difficult to find and with a view to attracting funding to allow the monitoring work to continue to conclusion a proposal will be produced to cover the rest of the project. **Action: Roy Brown**

7 The Role of the Bracken Control Group

- 7.1 There was support for the continuation of the Group in its current form.

8 Communications

- 8.1 Briefings for decision makers & politicians.
 - 8.1.1 Too much publicity at the moment might be counter-productive. While the registration process was proceeding and the Emergency Authorisations were being granted, there was little need for input from political briefing.
 - 8.1.2 The situation with aerial application would be kept under review and briefings could be prepared if the continuation of aerial application came under threat.
- 8.2 Information for BCG supporters / public.
 - 8.2.1 There would be no benefit from a PR campaign organised by the BCG. The supporters of the group should be used to circulate any news items about bracken through their own networks. The BCG would take no action beyond issuing newsletters. The newsletter circulation included some members of the press.

9 Next Steps

- 9.1 The application for the Emergency Authorisation will be submitted as soon as possible. **Action: Coordinator**
- 9.2 A deadline for reporting on the actions agreed that the meeting will be included with the Minutes so that progress can be reported to all members of the Group.

10 Any other business

- 10.1 Changes to the Sector Representatives were highlighted. Katherine Hearn had left the National Trust, and Natural England suggested Stuart Clark as a substitute. The coordinator will contact him. **Action: Coordinator.** Phil Stocker, Chief Executive of the National Sheep Association has been added. BADA UK was wound up early in 2014; Wendy Fox has been removed from the list.
- 10.2 The Permit System was discussed and it was thought to be working well.
- 10.3 The role of adjuvants was discussed. Some of the stickers and wetters used previously are now out of production. Use of adjuvants has benefits and it is an area that should be investigated as part of the re-authorisation of asulam.
- 10.4 A meeting had taken place at CRD on 14 July. Natural England will circulate the notes from the meeting. **Action: Natural England**
- 10.5 To alleviate the concerns about the application of asulam by unqualified people consideration will be given to encouraging the UPL distributors to provide training. It was suggested that training to achieve the PA1 & PA6a certificates would be required. This would be investigated. **Action: UPL**
- 10.6 The concerns about untrained application should also be addressed in a statement for the website, which could also be used to promote available courses.

11 Date of next meeting

- 11.1 Unless there was a need to meet earlier, the aim would be to organise a similar meeting in September / October 2015. George Winn-Darley kindly agreed to host another meeting.
- 11.2 It might be better to hold the meeting in October, as this would give more time for reviewing the bracken control season. However, if the submission of the Emergency Authorisation has to wait to receive endorsement from members of the Group, a later meeting would delay this.

Summary of Actions

Reference	Details	Action By
2.1.1	Contact Prof Robin Pakeman – area of bracken cover	Coordinator
2.2.4	Letter of Access – need to be renewed?	CRD
2.3.6	Advise on progress of registration application	UPL
2.4.1	Announce asulam price by 31 January 2015	UPL
3.1.2	Investigate spray authorisation difficulties	Natural England, Heli-Lift Services
3.3.3	Copy of letter to CAA to be sent to BCG	PDG
4.5.3	Discuss write up of Bracken Proving Trial	UPL / Landward
5.4	Agri-environment scheme comparison across the UK – consider.	Coordinator, Natural England
6.8	Proposal to complete Alternative to Asulam work	Roy Brown
9.1	Submit application for Emergency Application	Coordinator
10.1	Contact possible Sector Representative from NT	Coordinator
10.4	Send Coordinator Notes from meeting at CRD on 14 Jul 14	Natural England
10.5	Knapsack sprayer training	UPL

Appendix: Attendance List

Sector	Representatives
BCG	Simon Thorp (Chairman)
Landowners and representative organisations	George Winn-Darley, Moorland Association Dafydd Jarrett, NFU Cymru
Distributors of Asulam	Graham Cranna, Agrii
Aerial Applicators (helicopter contractor)	Alasdair Laing, PDG Mike Davies, MD Air Services Stuart Ring, Heli-Lift Services
Government Agencies	Alastair Burn, Natural England
Health information	Professor Roy Brown
Technical adviser	Dr Roderick Robinson, Landward Consultancy
CRD	Grant Stark
UPL Confor & Forestry Commission	Richard Allen Chris Delf Oliver Combe

Total: 14