



THE HEATHER TRUST

Promoting Integrated Moorland Management

Statement in Support of the Retention of Asulam for Bracken Control

Made on behalf of the Supporting Organisations

- 1 The registration of Asulam, used for bracken *Pteridium aquilinum* control in the UK, is being reviewed under EU legislation, Directive 91/414/EEC (the Directive). This could result in Asulam no longer being available.
- 2 The organisations listed in Appendix 1 wish to record their concern about the damage that will occur to the conservation status of large parts of remote rural areas in the UK, if Asulam is no longer available to control bracken. Many of the areas that will be affected are Special Areas of Conservation, Special Protection Areas, Sites of Special Scientific Interest or areas of national archaeological interest.
- 3 Removal of the most important weapon in the battle against encroaching bracken will make it difficult or impossible to achieve and maintain favourable condition status.
- 4 We believe that if Asulam is no longer available for bracken control in the UK there will be many losers and no winners.
- 5 The decision about whether to include Asulam on Annex 1 to the Directive has been referred to an Appeals Committee. We ask that this Committee carefully reviews the "Issues for Consideration" that are outlined in Appendix 2 to this statement before reaching a decision.
- 6 If the Appeals Committee decides in favour of non-registration on Annex 1, we think it essential that Defra, in conjunction with the Scottish and Welsh Governments and the Northern Ireland Assembly, takes immediate steps to pursue vigorously an alternative arrangement that will maintain the availability of Asulam for bracken control in the UK.

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Supporting Organisations & Individuals

Aerial Application Association
Alyn Smith, MEP
Association of Deer Management Groups
BASC
Brecon Beacons National Park Authority
Butterfly Conservation
Confor
Country Land & Business Association
Countryside Alliance
Forestry Contracting Association
Game & Wildlife Conservation Trust
Game Conservancy Scottish Research Trust
Heather Trust
International Bracken Group
Lake District National Park Authority
Landward Consultancy
Moorland Association
National Farmers Union Scotland
National Farmers Union Cymru
National Gamekeepers Organisation
National Sheep Association
Pastoral Alliance
Prof Rob Marrs
Royal Forestry Society
Royal Institution of Chartered Surveyors
Royal Scottish Forestry Society
Scottish Countryside Alliance
Scottish Gamekeepers Association
Scottish Land & Estates
Scottish Land & Estates Moorland Group

Supporting Information

1 Issues for Consideration

- 1.1 Asulam is the only selective herbicide available for bracken control.
- 1.2 Other control products, or mechanical processes, are of very limited efficacy, or are not selective and will, therefore, cause damage to non-target species.
- 1.3 Asulam is the only herbicide for bracken control licensed for aerial application.
- 1.4 The ability to apply Asulam by helicopter is essential for controlling bracken in upland areas where access by machinery on the ground is not possible due to gradient or the broken surface conditions.
- 1.5 Bracken is an invasive species and a reduction in control effort that will result from removal of Asulam will inevitably lead to an increase in the area covered by bracken.
- 1.6 The expansion of the area of bracken will be at the expense of other more sensitive upland and moorland species, of which heather is one of the most significant. This will result in a decline of biodiversity in moorland and upland areas.
- 1.7 The uplands are being increasingly recognised as a provider of ecosystem services and this emphasises the importance of keeping these iconic areas in good condition. To achieve this requires the ability to control invasive species, such as bracken.
- 1.8 The risk assessment carried out by the European Food Standards Agency (EFSA) identified a food safety risk on spinach. In the UK, the concern over the possible loss of Asulam relates to its specialist use as a selective control agent for bracken.

2 Current Status

- 2.1 To be approved for use in the EU, Asulam needs to be included on Annex 1 of Directive 91/414/EEC. Registration is controlled by the EC Standing Committee on the Food Chain and Animal Health (SCoFCAH). This Committee is made up of scientists from each of the 27 Member States and is chaired by a representative of the European Commission.
- 2.2 SCoFCAH has reviewed the status of Asulam. In view of concerns about food safety identified by the European Food Standards Agency (EFSA), linked to use of Asulam on food crops (and on spinach in particular), the Committee recommended that Asulam be removed from Annex 1 to Directive 91/414/EEC, thus making it unavailable for use throughout the EU.
- 2.3 Six countries have formed a blocking minority and the matter has been referred to an Appeals Committee that first meets on 20 September 2011.