



**Minutes**  
of the  
**Bracken Control meeting**  
held at  
**Aldby Park, Buttercrambe, YORK YO41 1XU**  
on  
**Wednesday 23<sup>rd</sup> September 2015**

**1 Welcome & Introduction**

- 1.1 George Winn-Darley was thanked for hosting the meeting.
- 1.2 A full attendance list and apologies is at Appendix 1.
- 1.3 Stand-in representatives were welcomed:
  - 1.3.1 Nick Short for the Forestry Commission, and
  - 1.3.2 David Clayden for Natural England.
- 1.4 Two observers were also welcomed:
  - 1.4.1 Carmel Ramwell, Senior Environmental Scientist, FERA
  - 1.4.2 Frederik Clauson-Kaas, PhD Student, University of Copenhagen
- 1.5 Apologies – Gerald Babcock (Contractor), Graeme Campbell (DARD NI).

**2 Asulam**

- 2.1 Emergency Authorisation for 2016.
  - 2.1.1 The Group reviewed the draft application for an Emergency Authorisation in 2016.
  - 2.1.2 Some minor changes were agreed and the application would be submitted as soon as possible after the meeting. **Action: BCG**
- 2.2 Chemicals Regulation Directorate view.
  - 2.2.1 There are some concerns that some Member States are abusing the Emergency Authorisation (EA) system, but CRD believes that the UK is applying the system correctly.
  - 2.2.2 A review of regulation EC No. 1107/2009 is in the offing, and the EU might come under pressure to remove the EA provision.

- 2.2.3 The EA process must:
- Establish the case for need,
  - Make sure that the use of the EA approach is limited and controlled,
  - Consider alternative treatment regimes, in place of chemical treatment, and
  - Ensure that long-term solutions are being sought.
- 2.2.4 Recently, the EA applications for asulam have been dealt with at officer level within CRD. This is a relatively simple system, which costs £4-500 and has a quick turnaround time (~4 weeks).
- 2.2.5 It is possible that Defra ministers may wish to consider all EA applications. Alternatively, the Expert Committee on Pesticides (ECP) (the successor to the Advisory Committee on Pesticides) may wish to consider the application.
- 2.2.6 If this occurs, the application fee may rise from £4-500 to £2,000, and it will take longer for a decision to be reached.
- 2.3 Update on Asulam registration
- 2.3.1 The application for Annex 1 registration (approval for the active substance) passed from CRD to EFSA, at the end of 2015.
- 2.3.2 The EFSA review will not be completed before mid-2017.
- 2.3.3 This will be followed by the application for Annex 3 registration (for the product). The estimate of the earliest date for the approval is Q1 2018.

### **3 Handheld Application of Asulam**

- 3.1 It is recognised that the handheld concentration for asulam is effective, but no progress can be made with the provision of data to support the use of stronger concentrations for use in handheld equipment, until registration is achieved.
- 3.2 Operator exposure is a key factor that is considered when setting the concentration rate. It is recognised that the 1:100 dilution is a precautionary concentration, but there is no data to base a stronger concentration on.
- 3.3 There is concern within the industry about the time taken to introduce new equipment or techniques. Many believe that the bracken problem is increasing during this waiting period.
- 3.4 UPL is investigating the possibility of mechanical application techniques with a range of companies. It was suggested that university departments should also be contacted. **Action: UPL**

- 3.5 There was a question about the use of improved PPE or different nozzles as a way to reduce the operator exposure risk to acceptable levels. For example, could spot guns be authorised for use with stronger concentrations, provided PPE and other specified precautions were adhered to?
- 3.6 CRD is willing to consider other application techniques, but the success of an application will depend on the data provided to support the application. Further consideration of the options will be given. **Action: UPL**
- 3.7 Sale of Asulam in 2016
  - 3.7.1 Sales in 2015 had been similar to 2014.
  - 3.7.2 Pricing for the 2016 season will be announced in January 2016.
  - 3.7.3 The returns policy for full, unopened containers will continue.

#### **4 Aerial Application of Asulam**

- 4.1 Feedback on the 2015 season.
  - 4.1.1 Some problems had been caused by late application by customers, and this had probably had an impact on the volume of asulam sold during the season.
- 4.2 Northern Ireland / Republic of Ireland
  - 4.2.1 There was some frustration that it had not been possible to respond to the request from the Department of Agriculture and Rural Development for helicopter bracken control in Northern Ireland.
  - 4.2.2 The areas for treatment are thought to be too small and therefore uneconomical. The availability of grants is restricted and the size of the market is small.
  - 4.2.3 A guaranteed area is required to justify the cost of taking a helicopter and support crew to Northern Ireland.
- 4.3 In Wales, the bureaucracy is more restrictive and has got bogged down within NRW.
- 4.4 Other aerial application issues.
  - 4.4.1 The system for processing applications for permits was discussed in response to concern about the time that this was taking.
  - 4.4.2 It was agreed that it might be useful to set up a stakeholder meeting to see where improvements could be made. **Action: CRD**
  - 4.4.3 It is important that applicants stick to the agreed procedure. They should use CRD as the point of contact and should not contact the conservation agencies direct.

- 4.4.4 The original intention was for the permits to be valid for 5 years. An extension to the validity will be considered. **Action: CRD.**
- 4.4.5 It is important that a realistic date is given for spraying to take place; it needs to be realistic and stand up to scrutiny by EU auditors.
- 4.4.6 Industry operating standards are required, and the EU has been informed that these are in production.
  - These should set out good practice measures.
  - The Aerial Applicators Association has been leading the production of this guidance and the BCG will offer support, where necessary. **Action: AAA**

## 5 **Alternative to Asulam**

### 5.1 Summary of trials and recommendations.

- 5.1.1 Roy Brown outlined the state of the trials he is running to compare the effectiveness of asulam with other chemical control agents,
- 5.1.2 The products tested include sulfonyl urea compounds, asulam and glyphosate. Glyphosate is included to assess the impact on non-target vegetation.
- 5.1.3 The trials have reached the three-year point and asulam has fared favourably against the other treatments.
  - After asulam, amidosulfuron (at full strength) was the most effective.
  - Metsulfuron has a continuing effect but does considerable damage to non-target species, including grasses.
  - Half-strength, amido / metsulfuron mix was most effective but has an impact on non-target species.
  - Asulam did not demonstrate any impact on non-target species.
  - Some of the alternative compounds are proving effective at controlling bracken but there are concerns about the persistence in the soil.
- 5.1.4 Support has been provided by the conservation agencies in England & Scotland. Support from Natural England will not carry forward into 2016, but SNH is committed to support for a further three years.
- 5.1.5 Support has also been received from Scottish Woodlands and the National Trust.
- 5.1.6 Conclusions:
  - Asulam is highly effective.
  - Amidosulfuron has a good level of control and little effect on non-target species.
  - Although Sulfonyl Ureas have no approval for aerial application they could have a role in supporting bracken control carried out by other means.

5.1.7 The trials will run for a further three years, until summer 2018. A further report will be given at the next meeting. **Action: Roy Brown**

## **6 Other Bracken Management Options**

### 6.1 Recent cutting demonstration events

6.1.1 Oakley Biofuels had organised a series of events to demonstrate Brielmaier cutting equipment, which is manufactured in Germany. George Winn-Darley attended one of the events.

6.1.2 This equipment has been developed for cutting alpine pastures: the operator walks behind the cutting machinery but there is a remote control option.

6.1.3 Conclusions:

- The Brielmaier equipment works well but costs £20-30,000.
- Oakley Biofuels is trying to raise £300,000 for a full feasibility study into producing bioethanol from bracken.
- No full-scale plant is operating yet.
- This initiative has limited relevance to bracken control: it seeks to grow bracken and then harvest it as a crop.

### 6.2 Brackenburn Ltd.

6.2.1 This company is based in south-west England and is producing 'braquettes' from bracken to burn on a fire.

## **7 Minutes of the Meeting held on 16 September 2014, and matters arising**

7.1 The status of actions from this meeting was reviewed. An updated list is at Appendix 2.

## **8 Any other business**

8.1 From 1<sup>st</sup> November 2015, it will be mandatory to hold PA1 and PA6 qualifications before using a knapsack sprayer.

8.2 Arrangements will be made to store Roy Brown's data securely. **Action Roy Brown, BCG**

8.3 The application for the Emergency Authorisation should be made as early in the year as possible.

## **9 Date of Next Meeting**

9.1 End of September 2016.

## Summary of Actions

<b>Reference</b>	<b>Details</b>	<b>Action By</b>
2.1.2	Submit EA application	BCG
3.4	Mechanical application techniques	UPL
3.6	Consideration of other application techniques	UPL
4.4.2	Consider a stakeholder meeting - discuss the Permit System	CRD
4.4.4	Extension to the duration of permits	CRD
4.4.6	Industry operating standards	AAA
5.1.7	Further report on bracken trials	Roy Brown
8.2	Storage of electronic data	Roy Brown / BCG

## **Appendix 1**

### **Attendance**

George Winn-Darley, Moorland Association (North Yorkshire)
Dafydd Jarrett, NFU Cymru (Gwynedd)
Ian Innes, PDG (Inverness)
Andrew McGillivray
Mike Davies, MD Air Services (Shropshire)
Stuart Ring, Heli-Lift services (Oxfordshire)
Colin Palmer, Confor
Mark Ballingall, SRUC (Perthshire)
Prof Roy Brown, International Bracken Group (North Yorks)
Roderick Robinson, Landward Consultancy (North Yorks)
Duncan Bogie, CRD
Grant Stark, CRD
Richard Allen, UPL
Chris Delph, UPL
Simon Thorp, Coordinator
<b>Observers</b>
Frederik Clauson-Kaas, Ph.D. Student, University of Copenhagen
Carmel Ramwell, Senior Environmental Scientist, FERA
<b>Apologies</b>
Tim Baynes, Scottish Land & Estates (Edinburgh)
Toby Small (Brecon Beacons)
John Thorley, Pastoral Alliance (Worcestershire)
Alastair Burn, Natural England (Peterborough)
Graeme Campbell, CAFRE, DARD NI (Antrim)
Sandy Gerrard (Devon)
Christopher Price, Country Land & Business Association (London)
Martin Curry (Lake District)
Andrew Bauer, NFUS (Edinburgh)
Phil Stocker, National Sheep Association (Worcestershire)
Graham Cranna, Agrii (Perth)
Ian Willoughby, Forestry Commission (Surrey)
Duncan Glen, Landmarc (Wiltshire & UK)

## Summary of Actions from the meeting held on 16 September 2014

Ref	Details	Action By	Status
2.1.1	Contact Prof Robin Pakeman – area of bracken cover	Coordinator	Complete
2.2.4	Letter of Access – need to be renewed?	CRD	Complete
2.3.6	Advise on progress of registration application	UPL	Ongoing
2.4.1	Announce asulam price by 31 January 2015	UPL	Complete
3.1.2	Investigate spray authorisation difficulties	Natural England, Heli-Lift Services	Carried forward
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	Ongoing
5.4	Agri-environment scheme comparison across the UK – consider.	Coordinator, Natural England	Completed - NFA
6.8	Proposal to complete Alternative to Asulam work	Roy Brown	Completed
9.1	Submit application for Emergency Application	Coordinator	Completed
10.1	Contact possible Sector Representative from NT	Coordinator	Completed
10.4	Send Coordinator Notes from meeting at CRD on 14 Jul 14	Natural England	Carried forward
10.5	Knapsack sprayer training	UPL	No further action