The Bracken Control Group

BRACKEN CONTROL UPDATE
31ST OCTOBER 2018

1 Asulam Emergency Authorisation

1.1 The application for an Emergency Authorisation (EA) for the 2019 season has been successful. Ministerial consent for the EA was received on 31st October 2018.

1.2 The application was submitted in July and this was considered by the Expert Committee on Pesticides on 25th September. All the application documents are available on the asulam webpage.

1.3 Key dates for 2019:

20 May 2019	Notice of Authorisation published by CRD. Start of the Emergency Authorisation period of 120 days. Storage, promotion, sales, and transfer authorised.
1 July 2019	Application of Asulam can commence.
16 September 2019	First expiry date: for sale & distribution of stocks. Storage and use of stocks can continue.
31 October 2019	Final expiry date: for disposal, storage and use of stocks. It will be illegal to apply or store Asulam after this date.

2 Registration of Asulam under EU Regulations

2.1 The application for the registration of Asulam (the chemical) under the current EU regulations continues to be considered, but it now appears that the application will not be decided until sometime, next year.

2.2 If successful, a further application will have to be submitted to register Asulox (the product) and this could take up to 12 months to be processed. Therefore, it is likely that a further EA application will be required to cover the 2020 season.

3 EA Application for 2020

3.1 CRD has indicated that, if a further EA is required for the 2020 season, the application will need to include the following information:
- 3.1.1 What area was treated?
- 3.1.2 What part of this area was treated the previous year
- 3.1.3 Where was the product used?
- 3.1.4 What proportion of the treated area used aerial spraying?

3.1.5 What proportion of the treated area was subject to the Stewardship Scheme

3.2 CRD has explained that the ECP has been tightening up on 120-day Emergency Applications and is now requiring more information demonstrating the limitation and control of such authorisations.

3.3 Discussion should take place within the BCG about how this information can be obtained. As a starting point, major distributors and users of asulam will be contacted and the information obtained will be compared with figures from UPL Europe Ltd. and other sources.

3.4 Support for this process will be essential if the EA application for 2020 is to stand a chance of success.

4 Bracken Control Meeting

4.1 For the last few years we have held a meeting in September, which has been a useful opportunity to consider all aspects of bracken control.

4.2 It is expected that the amount of development work around bracken control will increase when the future of asulam is decided, but until then, there is only a limited amount of change that can be introduced.

4.3 There was concern that these meetings could become routine and achieve little. Options for holding a meeting were discussed with several people and the view was that an alternative approach might be more productive.

4.4 Therefore, it is not intended to hold a meeting this year, but it is proposed set up a meeting, possibly linked to site visit, next year (late May / early June?).

4.5 This meeting / event could be used as an opportunity to bring people together to consider practical measures on the ground and also discuss the issues that will need to be addressed when the future of bracken control is more certain.

4.6 By the time of this proposed meeting, we may have a better idea where the asulam registration process has got to, and we may know more about the future of agri-environment support, after leaving the EU.

4.7 Comments about this proposal will be welcomed and suggestions about how the proposed meeting next year should be structured. For example: should efforts be focused on just one meeting, or should several meetings be considered in different parts of the country?

4.8 The minutes from the meeting last September are on the Bracken Control website. Progress has not been made with some of the items and this is the justification for the development of an Action Plan (see below). It will be important that aspirations are restricted to what can be achieved with available resources.

4.9 As a way of maintaining momentum, if there is a demand, a conference call could be set up, before the end of the year, to allow discussion of some of the issues. Please advise if this would be of interest.

5 Bracken Control - Action Plan

5.1 It is suggested that the BCG should consider the development of an Action Plan at the meeting(s) next year.

5.2 Assuming a successful outcome, the aim will be to develop a programme of work that can be implemented as soon as the registration application for asulam is approved. Suggestions for the expansion of this list will be welcome, but initial ideas are:

5.2.1 Chemical control

- The use of stickers and wetters to reduce the risk of negative environmental impact from the application of asulam and to improve its effectiveness.
- Development of an effective control regime that uses hand-held equipment.

5.2.2 Provide Support for the use of drones as an extra bracken control tool.

5.2.3 Better information about the area of bracken controlled, by all methods.

5.2.4 Promotion of the different bracken control techniques to encourage a greater area of bracken control.

6 National Bracken Control Trials

6.1 The surveying work has been completed and the final reports from the 19 sites are being prepared.

6.2 A summary report will be prepared for circulation in early 2019.

6.3 It appears that Asulam continues to offer the best combination of effectiveness and lack of impact on non-target species.

7 Drones

7.1 There continues to be a lot of discussion about how spray drones could be used for bracken control.

7.2 However, no authorisation has been given for any pilot projects to take place and this situation is unlikely to change until the drone companies can provide the Chemicals Regulation Division with data that supports the safe use of this equipment.

7.3 In parallel, there is scope to explore the use of the accurate vegetation mapping potential of drones. After primary treatment this would allow regenerating bracken to be mapped accurately.

7.4 For chemical treatment of bracken, drones could be of particular value for follow-up work and for treatment of small areas where access on the ground is difficult or impossible - for example: on steep banks or under overhead power lines.

7.5 The asulam label may be changed for next season to make it clear that the application of asulam by a drone is not authorised, and to emphasise that the only approved method for aerial application of asulam will be from a helicopter.

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