



IRISH TIMBER GROWERS ASSOCIATION

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Irish Timber Growers Association submission to the Department of Agriculture, Food and the Marine on Plant Health and Biosecurity Strategy 2020 - 2025

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The Irish Timber Growers Association (ITGA) was established in 1977 and is the national representative body of private woodland owners in Ireland. The membership of the Association mirrors the wide range of different timber growers in the country and current membership includes farm forest owners, forestry co-operative members, private woodland estates, forestry investors and forestry pension funds. This wide range of membership allows the Association to take a broad view of the industry and issues facing the sector.

The Irish Timber Growers Association welcomes the opportunity to make this submission to the Department of Agriculture, Food and the Marine (DAFM) on its draft Plant Health and Biosecurity Strategy 2020-2025.

The general questions posed in the DAFM communication seeking stakeholder views on the development of the Plant Health and Biosecurity Strategy 2020-2025 are addressed below;

- **Does this strategy address your view's around Plant Health and Biosecurity?**

From the draft DAFM Plant Health and Biosecurity Strategy document (draft strategy) circulated, it is assumed in this ITGA submission that deer, grey squirrel and other animal pests of forests and also relevant Invasive Alien Species (IAS), which are not referred to or included in the DAFM draft Strategy, that such pests/invasive species are fully and adequately addressed in separate DAFM or other Department's relevant Strategic documents.

- **What needs to be further considered?**

The following points should be more fully addressed and elaborated on in the DAFM Plant Health and Biosecurity Strategy document;

- The devising and putting in place of a Generic Emergency Response Plan for newly discovered forest pests/pathogens and communicating this on an ongoing basis with the sector should be included and prioritised in the Strategy.

- It is proposed in the draft strategy that training initiatives would be established for *‘those involved in Plant Health or Plant Production’*. It is recommended that such training initiatives should also be established for those involved in forest management. As part of such a training course, a module on Forest Hygiene and Biosecurity in forest management operations should be included.
- As part of a Plant Health and Biosecurity Strategy, general biosecurity and forest hygiene guidance for forest inspections and management operations should be prepared. For example, the UK Forestry Commission has produced guidance on biosecurity measures and good working practice for the forestry sector. This guidance is for anyone who works for or carries out official duties on behalf of the Forestry Commission and others. The booklet details practical steps designed to minimise the risk of introducing or spreading pests and diseases. It includes a decision tree which can be used to plan the level of biosecurity needed in a particular situation, and a table which shows the biosecurity measures to use for low-risk and high-risk activities. See <https://www.forestryengland.uk/sites/default/files/pdf/Biosecurity%20Policy.pdf>
- Early detection is often the key to good biosecurity outcomes. As part of a Plant Health and Biosecurity Strategy a Cost benefit Analysis (CBA) should be included as part of the recommendations. Such a CBA can be undertaken on a potential pathogen/pest so that measures of relative benefits and costs can be known prior to specific actions. For additional information based on research by the Environmental Economics Research Hub and Tom Kompas of the Australian Centre for Biosecurity and Environmental Economics, Australian National University, on how Cost-benefit analysis can help ensure that appropriate and cost-effective biosecurity measures are taken, see https://crawford.anu.edu.au/research_units/eeerh/pdf/policy_brief/2010/tkompas.pdf
- More details on the extent and nature of potential Public Awareness Campaigns should be included in the Strategy document and in particular by outlining a strategy on how to *‘strengthen surveillance partnerships with stakeholders’* as mentioned in the draft Strategy.
- It is important to include details of Key Performance Indicators (KPIs) for the various recommendations included in the Plant Health and Biosecurity Strategy document.
- It is assumed that an Implementation Plan will be produced as mentioned on page 7 of the draft document to follow on from a finalised Plant Health and Biosecurity Strategy document.
- **Any additional suggestions on the strategy?**
- In relation to strategic goals and recommendations that should be employed in the Plant Health and Biosecurity Strategy, Ireland’s Forest Policy document, *‘Forests, products and people - Ireland’s forest policy – a renewed vision’* (Department of Agriculture Food and the Marine, 2014), should be a primary document referenced and employed in updating the Department’s Plant Health and Biosecurity Strategy 2020-2025. An appropriate way to assess performance would be to monitor progress in the implementation of the stated Strategic Actions in this Forest Policy document.
- In addition, the recent COFORD Forest Policy Review Group Report, *‘Forests, products and people - Ireland’s forest policy – a renewed vision (2014), A Report on*

Policy Implementation with Recommendations (COFORD, 2018)’, is a detailed recent review of Strategic Actions implemented and progress to date. This report is published and available on <http://www.coford.ie/media/coford/content/publications/2018/1COFORDForestPolicyReviewGroupReport121218.pdf> and should be reviewed and referenced in preparing this Department’s Plant Health and Biosecurity Strategy 2020-2025.

In this regard, the Policy Statement in relation to Forest Health in the Forest Policy document states;

To maintain a healthy forest environment through sustainable forest management and early detection and control measures to prevent the introduction and spread of harmful invasive alien species, pests and diseases.

The following specific strategic actions are taken from the policy document which should be fully addressed in the Plant Health and Biosecurity Strategy;
[Where the strategic actions referenced below are shown as NEW, they represent recommendations made to the Minister of State for Forestry by the COFORD Council in 2018 following the work of the Forest Policy Review Group];

6.3 DAFM to update the format for the forest management plan to include an overall risk assessment (biotic and abiotic) and identification of appropriate mitigation and prevention measures.

6.4 The Forest Protection Guidelines and Forestry Schemes Manual to be updated in light of new and emerging threats to forests and supported where appropriate with public awareness campaigns and information targeted at forest owners, landowners and the general public.

6.4a [NEW] In light of increasing biotic threats due to climate change and globalisation, DAFM to employ dedicated forest pathologist/ entomologist to improve detection and response to pests and diseases

6.6 The use of species and provenances with proven disease resistance to be favoured in grant-aided afforestation and encouraged in all planting

6.7 DAFM to continue to identify and analyse forest pest and disease risks from abroad and to maintain monitoring, bio security and phytosanitary measures to reduce the risk of entry and establishment of harmful non-native pests, diseases and invasive alien species and, depending on impending threats, consider the establishment of a Bio security Taskforce.

6.9 DAFM/COFORD to consider support of field scale evaluation of non-chemical measures including nematodes, and silvicultural practices and following this indicate appropriate measures for the control of the large pine weevil.

6.13 [NEW] DAFM to develop and disseminate guidance on forest biosecurity

6.14 [NEW] DAFM to develop guidance on the management of diseased/ pest infected crops e.g. Ash and Chalara.

- In relation to the recommendation in the draft strategy to, ‘*review and refine current approaches to surveillance and monitoring and make improvements*’, reference in the strategy should be made to monitoring of new international developments in more efficient pest detection methods, systems and technology.

By way of a current example in relation to the above, an inventory at the end of November 2018 in Sweden found that at least 2.5 million cubic metres of forest were infected by the eight-toothed spruce bark beetle (*Ips*). In Central Europe, this figure was approximately 50 million cubic metres and this pest now represents a potential major threat to Irish spruce forests which account for over 50% of our forest estate. In Sweden, it was forecast that with a cold and wet summer another approximately 2.5 million cubic metres of Swedish forests could be attacked, however, if the summer becomes hot and dry, this figure could increase to 12.5 million cubic metres.

The use of geospatial data analytics to identify and monitor *Ips* and other pest outbreaks has potential. For example, there is a strong correlation between moisture levels in the crop and spruce bark beetle damage, which can be picked up by satellite and can lead to early detection.

A unique way of detecting the Eight-toothed spruce bark beetle and potentially other pests is through the use of sniffer dogs. The spruce bark beetle is not easy to see with the naked eye, but a trained dog can detect a tree or timber that has been attacked by *Ips*.

A human can have had difficulty finding early infested trees or timber. At the beginning of an infestation, the only signs are tiny entry holes plus fine sawdust around the tree trunks.

Trained dogs have successfully hunted bark beetle infestation for several years and in Sweden dogs are specifically trained for this. This method could be employed to effectively and efficiently monitor wood imports which can be very time consuming for an individual inspector but with a dog can be undertaken quickly. For example, in a forest situation a dog and handler can search approximate 10 hectares per hour and, depending on the wind direction, a dog can detect a recently attacked spruce from approximately 100 metres.

Field trials in collaboration with the Swedish University of Agricultural Sciences (SLU) and the Swedish Forest Agency have shown that using sniffer dogs to detect and locate infested trees is an efficient tool to rapidly identify trees recently attacked by the spruce bark beetles. Such an early detection system could be rapidly employed to monitor wood imports and a strategy that priorities such new international developments should be included in the document.

The Irish Timber Growers Association (ITGA) through its work and various information and representation initiatives is committed to supporting the sector and its critical role in the sustainable economic, environmental and social development of rural Ireland. ITGA is actively supporting and promoting forestry’s contribution to the State and recognises the significant importance of developing and implementing a comprehensive and robust national Plant Health and Biosecurity Strategy.