



Newsletter

Asulam for Bracken Control Emergency Authorisation for 2022

16th February 2022

Victoria Prentis MP, Minister for Farming, Fisheries and Food, has responsibilities for pesticides at Defra. This newsletter covers the points that were made to the Minister in a letter that was sent to her on 15th February 2022.

The letter addresses the issues that will influence the EA decision this year, with links to supporting information where appropriate.

This newsletter provides a summary of the issues that were raised in the letter to Defra. Two key issues that were included in the EA application are covered first, followed by a summary of other issues.

The Emergency Authorisation (EA) application

The latest EA application for the use of asulam for bracken control is due to be considered by the Expert Committee for Pesticides (ECP) at a meeting on 8th March. Following this meeting, the Chemicals Regulation Division (CRD) of HSE will make a recommendation to the Minister and representatives of the Devolved Administrations about a response to the application.

Duration of any EA Approval

During the BCG webinar in October 2021¹, UPL Europe Ltd, the manufacturers of asulam, stated it will take a minimum of two years, and possibly up to five years, to provide the data that will allow the application for full regulatory approval of asulam in the UK to be determined.

Therefore, assuming it is agreed that the continued use of asulam is appropriate, at least another two annual EA applications will be required.

The EA procedure exists to provide approval for pesticide use that is unexpected. In view of the history of previous EA approvals and the continued support for the use of asulam, it can be argued that the use of this procedure is inappropriate. A longer duration for any approval has been requested in the latest EA application², perhaps subject to annual review.

A longer duration would allow the energy and effort absorbed by the annual application and administration process to be redirected to finding a more permanent solution for bracken control.

¹ <https://www.brackencontrol.co.uk/information/meetings>

² Annex D Section 4 (Key Issues for the BCG): EA Application 2022 - <https://brackencontrol.co.uk/asulam/eaapp2022>

This will also allow time for the assessment of further data that is being gathered from ongoing research and in support of the application for full UK regulatory approval of asulam. This additional information would allow a decision about the future use of asulam and alternative pesticides to be based on more robust evidence.

Bracken Control: Strategy and Stewardship

The scale of the threats to biodiversity, human health, landscape and rural enterprises justify a more holistic approach; it has been recommended that a high-level bracken control strategy should be developed with all the UK conservation agencies. A strategy should place the control of bracken in context, with respect to the requirements of the different administrations, so that the risks of using pesticides are considered against the benefits of allowing pesticide-based bracken control programmes to continue.

At present, landowners and managers are receiving mixed messages. On the one hand, agri-environment schemes are providing long-term funding for bracken control using asulam products, but on the other hand, restrictions on the use of asulam products are being imposed. A strategy is needed to address this dichotomy.

A strategy should provide a framework for the development of an improved stewardship approach to bracken control that introduces effective controls to manage and monitor the use of the various bracken control techniques, including pesticides. A greater emphasis would be placed on integrated pest management, with a view to reducing reliance on pesticide use.

The arrangements that have been established for the safe use of rodenticides³ provide an example of an industry-controlled stewardship system that promotes best practice. It is likely that this could be adapted to cover the use of bracken control pesticides, perhaps with input from a government oversight group.

The proposal to improve stewardship arrangements is likely to anticipate the provisions included in the ‘Revised National Action Plan for the Sustainable Use of Pesticides’, which is due to be published this Spring.

Summary of other issues

- 1 All four UK Conservation Agencies support the Group’s view that, where pesticide application is deemed to be the most appropriate control method, currently there is no acceptable alternative to asulam for large-scale, safe and effective bracken control.
- 2 The lack of an alternative to asulam may change with more evidence, but the research to provide the evidence requires investment. The justification for this investment can only come from an expectation that there will continue to be a market for existing and new bracken control equipment and products. A bracken control strategy should address this concern.
- 3 The introduction of an improved stewardship approach, established as part of a UK bracken control strategy, would aim to increase the amount of bracken controlled while reducing the dependence on pesticides.

³ CRRU UK Code of Best Practice: <https://bit.ly/3LAWlou>

- 4 Bracken exudates include *Ptaquiloside*, which has carcinogenic properties. This was first raised in a report published in 1965⁴, but further research from an international project is due to be published in 2022.
- 5 EFSA's view that asulam is an endocrine disruptor is significant, but there is an argument that, as EFSA's view has been based on application of asulam as a pesticide on a food crop (spinach), this should not automatically be fatal to an application for use of asulam for bracken control.
- 6 If asulam is removed from the options for bracken control, while there is no acceptable alternative, there is a real risk that bracken control will collapse. This will allow the risks associated with bracken to increase largely unchecked and will run counter to the current Defra initiatives in habitat restoration, peat conservation and the encouragement of greater public use of the countryside.
- 7 The trials to assess the amount of drift associated with the use of modern spray-boom technology have provided data that will allow the buffer zone against surface water bodies to be reviewed based on up to date evidence⁵.
- 8 All trials are based on a single pesticide application. Cumulative effects of repeated application of pesticides (for primary and follow-up treatments) need to be considered in future research.
- 9 The current and proposed agri-environment schemes include support for bracken control. Most of this support provides funding for control using asulam. Until the evidence is available about the use of safe and effective alternatives to asulam, to maintain the bracken control options included in agri-environment agreements, the BCG recommends that asulam should continue to be available for aerial and ground-based application.
- 10 The aerial spraying capability within the UK largely depends on the income from bracken control activity. It is important to retain this capability to provide a control option for existing and future pests and diseases in forestry and other habitats.

Conclusion

In spite of its benefits, bracken presents a long-term challenge to the maintenance of open habitats and the health of humans, wildlife and domestic animals, throughout the UK. The BCG believes that government should encourage the continuation of a coordinated bracken control regime, that balances risk with benefit. Unless evidence emerges that indicates asulam is unsafe to apply, it should continue to be available as an important option, for aerial and ground-based application, alongside other control techniques and the application of other pesticides that are proved to satisfy safety and efficacy criteria.

⁴ Evans, I. A., & Mason, J. (1965). Carcinogenic activity of bracken. *Nature*, 208(5013), 913-914.

⁵ Drift Trials Report - <https://brackencontrol.co.uk/research1/research-reports>