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Dear Scott

Consultation on the draft Scottish Government guidance on how to prevent the spread of ragwort

We welcome the opportunity to submit comments on the draft Scottish Government guidance on how to prevent the spread of ragwort and we support the issuing of such guidance, where it can guide appropriate control of ragwort in areas where it harms grazing animals.

Consultation process:

We are concerned that the list of consultees, to whom this consultation was sent directly, is not representative of the audience for this guidance. We note, for example, from your list of consultees that no environmental organisations or government agencies were consulted directly by the Scottish government, which is disappointing, given the importance of this issue and of ragwort to biodiversity in Scotland. Furthermore, while the introduction to the document states that the guidance "will be particularly relevant for large scale organisations managing significant land areas, including local authorities and public bodies" the consultee list does not include any land owners such as the National Trust for Scotland, the Royal Society for Protection of Birds, the John Muir Trust, the Woodland Trust or Forestry Commission, all of which own considerable tracts of land and will ultimately have responsibility to implement this guidance.

However, we trust our comments on the guidance will be useful to you. Subject to the comments below, we support this guidance and see it as a useful addition to the ragwort issue in Scotland.

Biodiversity and ragwort

As a native species, Common Ragwort is part of our natural heritage and the UK Government has signed international agreements, such as the Convention on Biological Diversity, to ensure its conservation. It is found in a range of dry, sandy or limy or neutral grassy places and dunes but flourishes in overgrazed and disturbed areas. The guidance outlines the wildlife interests associated with the Common Ragwort and because of these wildlife interests, we are keen to

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ensure that any guidance issued by the Scottish government is proportionate and has due regard to our native biodiversity, as enshrined in the Nature Conservation (Scotland) Act 2004.

Assessing the risk posed by ragwort:

Research published by the Ecological Society of America¹ indicated that 89% of ragwort seed travelled no more than 5m, with none found more than 14m from source. Recruitment is from nearby plants and pest levels of ragwort abundance are dependant on land management, not seed source proximity. Local factors, including prevailing wind and topography, will be important in determining the distance ragwort seed is able to travel, which will mean that each site will need to be assessed independently for its risk factor. Large buffer zones are likely to have a comparatively small benefit. The definitions in the guidance to assess the risk posed by ragwort are therefore inappropriate.

Control methods:

Grassland management:

We welcome the emphasis given to appropriate land management and see this as a major tool in maintaining biodiverse, healthy habitats and pastures. Appropriately managed pastures will include small areas of poached / bare ground and some dung and these habitats are all important in maintaining high invertebrate biodiversity. Where pasture management is poor, these areas become susceptible to ragwort colonisation.

Chemical control techniques:

Herbicide selective spraying: we do not agree that this is a suitable control method for large areas, because of the collateral damage to other broadleaved plants. This technique is also not suitable next to drainage courses. It should therefore only be used as a last resort for extremely severe infestations where no other broadleaved plants grow.

We would suggest insertion of the following sentence at the start of paragraph 14 of Appendix 3:

“Widescale spraying with herbicide is not recommended. Use of herbicide should be a last resort and carefully targeted through spot application.”

Biological control techniques:

We are not clear on which biological control methods this guidance refers. There is no evidence that cinnabar moths are an effective control for ragwort. While cinnabar moth caterpillars will strip leaves and flower buds from ragwort plants completely, they only do this until the caterpillar pupates. The plants usually then recover quickly after this and grow new leaves. Furthermore, within Scotland the Cinnabar moth is confined to the south and coastal areas and is unlikely to survive further north and west.

¹ McEvoy P.B. and Cox C. S. Wind Dispersal Distances in Dimorphic Achenes of Ragwort, *Senecio jacobaea*. Ecology 68(6) 1987 pp 206-2015

Decision tree (Appendix 3, Figure 1):

Although we fully support the requirement to establish the presence of listed species at each site, there are no existing mechanisms to enable land owners to access these data without paying for specialist surveys. In the case of invertebrates, there are little data for many areas of the country at a field by field level. We cannot therefore see how the first step of the decision can be met within current resources and it will not provide any protection to most sites where listed species occur. An alternative mechanism must be found prior to publication.

We fully support this guidance and once the above points have been taken into account, believe this will form useful and necessary guidance for land managers. We are keen to see a balance retained between healthy landscapes for biodiversity and husbandry. This means ragwort should be prevented from growing in pastures used by grazing animals but left to grow elsewhere as part of our natural biodiversity heritage, supporting a wide range of invertebrates and fungi. Butterfly Conservation, Plantlife and the British Horse Society are launching a new joint leaflet in June 2008, which outlines our suggestions for ragwort control and management in Scotland. We include a pre-launch copy for your information.

This consultation response is supported by the following member organisations of Scottish Environment Link's Biodiversity Task Force:

Plantlife Scotland
Butterfly Conservation
Buglife
Scottish Wildlife Trust
Woodland Trust Scotland
John Muir Trust
National Trust for Scotland
RSPB Scotland

Please contact me if you have any queries on this response.

Yours sincerely

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