

# Environment, Planning & Countryside

## EPC(2)-07-06-(p9) (Annex 2)

### Summary of Consultation Responses to the Draft Code of Practice to Prevent and Control the Spread of Ragwort

Responses were received from:

Butterfly Conservation Wales

Countryside Council for Wales

Farmers' Union of Wales

Mrs Jennifer Gladstone

National Association of Agricultural Contractors

National Trust Wales

Network Rail

Rhondda Cynon Taff County Borough Council

Of the 8 recipients who replied, there was a broad level of support for the Code.

Respondent	Comments

<p>Butterfly Conservation Wales</p>	<ul style="list-style-type: none"> <li>· Felt that the Code will be a valuable tool to ensure livestock welfare whilst maintaining the biodiversity importance of Ragwort.</li> <li>· Glad that the Code emphasises control based on assessment of the need and consideration of environmental implications.</li> <li>· Felt that greater emphasis should be given to the nature conservation importance of Common Ragwort.</li> <li>· Felt that the descriptions of Ragwort were inadequate unless photographs were to be included in the finished document.</li> <li>· Suggested that NAW produce guidance on land management for equine owners to help prevent the conditions that cause Ragwort infestations.</li> <li>· Suggested that mention is made of onsite burning as a means of disposal.</li> </ul>
<p>Countryside Council for Wales</p>	<ul style="list-style-type: none"> <li>· Felt that the Code offered well-balanced guidance.</li> <li>· Suggested amendments to contact details and web addresses.</li> <li>· Highlighted a Birmingham University review of herbicide treatments on Ragwort</li> </ul>
<p>Mrs Jennifer Gladstone</p>	<ul style="list-style-type: none"> <li>· Queried the length of the draft Code.</li> <li>· Identified apparent inconsistencies in approach to grazing as a means of control.</li> <li>· General discussion on poor land management and husbandry.</li> <li>· Hoped that the Code would result in more prosecutions.</li> </ul>

<p>National Association of Agricultural Contractors</p>	<ul style="list-style-type: none"> <li>· Welcomed the Code and its aims.</li> <li>· Felt that the costing for spraying was inaccurate. Indicated that these should be removed and replaced with a recommendation that landowners approach the NAAC for details of local contractors.</li> <li>· Felt that the costing for citronella treatments and weed wipes were similarly inaccurate.</li> <li>· Indicated that instead of mentioning the Orange Code, mention should be made of the Revised Code of Practice for the Safe Use of Plant Protection Products, which will replace it later this year.</li> </ul>
<p>Network Rail</p>	<ul style="list-style-type: none"> <li>· Felt that the Welsh Code should be closely aligned to the Defra version.</li> <li>· Requested slight changes to wording in various paragraphs</li> <li>· Requested deletion of Table 1 as being "too complicated".</li> <li>· Identified repetition in paragraphs 51-58.</li> <li>· Requested deletion of paragraphs 95-98 and replacement with new supplied paragraphs.</li> <li>· Requested deletion of paragraph 80 and replacement with new supplied paragraph.</li> <li>· Advised of change of telephone number for Network Rail.</li> </ul>
<p>Farmers' Union of Wales</p>	<ul style="list-style-type: none"> <li>· Welcomed the Code in principle.</li> <li>· Concerned at the prevalence of Ragwort on land abutting highways, railways and derelict land.</li> <li>· Concerned that little has been done to control Ragwort so far</li> <li>· Advocated eradication of Ragwort.</li> </ul>

National Trust Wales	<ul style="list-style-type: none"> <li>· Indicated that the Code offered much sound, practical advice</li> <li>· Considered that it was important that NAW meets with the equine lobby at a high level to discuss</li> <li>· Believed strongly that the risk category distances are "not evidence-based and are unnecessarily wide and impractical". Recommended that they be made much smaller</li> <li>· Not happy with the emphasis on burning and landfill as means of disposal. Suggested contacting a Defra working party led by Judith Marsden for further updated information on disposal</li> </ul>
Rhondda Cynon Taff CBC	<ul style="list-style-type: none"> <li>· Felt that reliance on zones of risk was too prescriptive</li> <li>· Suggested that NAW undertake a visible policy of public education, eg roadshows, weblinks, etc</li> <li>· Requested guidance on stocking levels as RCT CBC felt that there may be a link between ragwort and overgrazing</li> <li>· Felt that removing all ragwort within 50m of grazing land would stretch resources unduly</li> <li>· Felt that the presence of ragwort does not necessarily imply a threat to livestock</li> <li>· Felt that there should be greater emphasis on good husbandry of grazing land</li> <li>· Enquired whether ragwort was classed as a type of waste by EA (apropos disposal). Pointed out that waste receptor centres may have a restriction on certain waste types</li> <li>· Felt it important to emphasise that ragwort is a native species with an important biodiversity role</li> </ul>