



THE HEATHER TRUST

Promoting Integrated Moorland Management

Ms Margaret O'Donnell
Defra
Ground Floor
Foss House
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YORK
YO1 7PX

15th October 2008

Dear Ms O'Donnell

Consultation on future management of risks from *Phytophthora ramorum* and *Phytophthora kernoviae*

The Heather Trust is an independent charity dedicated to the promotion of high standards of moorland management. Working with a wide range of other organisations throughout the UK, the Trust seeks to improve moorland habitat for the benefit of wildlife, domestic stock, game and all people with an interest in moorland areas.

A quarter of the UK's heather moorland has been lost since 1945, and the loss is continuing at about 0.5% each year. This is of the greatest concern to The Heather Trust, as one of our main aims is to help with the restoration of heather cover towards former levels. We seek to maintain and improve moorland biodiversity, and believe that if heather is present on a moor in good condition, it is an indication that the interests of almost all those with a stake in that area of moorland will be satisfied. Heather is important in its own right, as a subject of the Habitat Action Plan, under the EU Habitats Directive.

We welcome Defra's consultation on future management of risks from *Phytophthora ramorum* and *Phytophthora kernoviae*, and we hope that our views can be taken into consideration as part of this process.

We recognise that there are many unknown quantities about the potential for the spread of *P. ramorum* and *P. kernoviae* onto moorland. We also recognise that there is too much at stake to sit back and do nothing, and therefore welcome the news that work is being undertaken to put a strategy in place, should there be further spread of *Phytophthora spp.* onto heathland.

We were one of the key players in the Moorland Burning Working Group, which was instrumental in revising the Heather and Grass Burning Code in 2007. We would therefore

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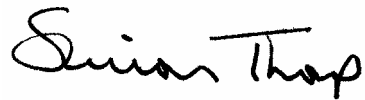
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welcome the opportunity to use our specialist knowledge of moorland, and its management in all parts of the UK uplands, as part of Defra's continued discussions on contingency planning.

The Trust would be concerned if Option 1 were to be adopted and we believe that the threat of a break out of this disease onto moorland is large enough to justify containment measures. Option 2 would appear to be a sensible move provided the costs of dealing with the current outbreaks can be justified, but this should be combined with using every reasonable means to carry out more research into these diseases to inform future decisions.

We trust that these thoughts are helpful in your deliberations. If we can provide any further clarification, please do not hesitate to contact us.

Yours sincerely,

A handwritten signature in black ink that reads "S P R Thorp". The signature is written in a cursive, slightly slanted style.

S P R Thorp
Director