

Chair of the ETRA Committee
Welsh Senedd
Cardiff

15th May 2023

Dear Chair of the ETRA Committee,

I am writing, on behalf of a group of forage maize seed breeders, to bring to your attention one of the unfortunate impacts of Brexit coming to a head this December which could have a significant negative impact on the ability of Welsh farmers to grow forage maize.

Seed Treatments

Currently, the forage maize seed (and some other crop seeds) we use in the UK is produced in Europe, and pre-treated with an appropriate fungicide to safeguard it against root zone diseases such as seedling blight, and a bird repellent to discourage corvids such as crows from taking out the seed once planted.

However, at the end of 2023, the import of such treated seed into the UK, and the use of seed already imported, will be illegal since the products are not licenced by CRD/SHE in this country. As part of the European Union free market, seed treated with a crop protection product has free movement across Member State boundaries irrespective of whether the product is registered in a particular Member State as long as it was applied to the seed in a Member State that does have a registration for it. Now that the UK is no longer a member of the EU, such rules do not apply and, as of 31 December 2023, it will be illegal to import, sell or sow seed treated with Kori (zorim) bird deterrent, Redigo M (triticonazole + metalaxyl) fungicide and Force (tefluthrin) insecticide.

The industry has been aware of the problem and has been striving to identify alternatives over the last 2 years but have failed to come up with suitable replacements during this time, a situation exacerbated by a seeming reluctance of the UK regulators to consider seed treatments.

The Impact

The situation is not a trivial one: a lack of suitable bird repellent can result in the total loss of the crop. Corvids are intelligent birds and quickly understand seed drilling patterns. For example, in the

photograph below, the crows were able to identify which plots were untreated and moved down the rows, learning the distance between seeds and taking almost all of them.



Likewise, a similar effect is observed on these trial forage maize plots in Clwyd in north Wales; note that the area surrounding the plots is also forage maize, with the seed having been treated with a bird repellent. The corvids ignore the treated areas and moved into the trial plots, focussing on areas where untreated seed had been planted. The result being almost 100% loss of the crop.



The danger is that farmers and growers turn away from the growing of forage maize, a high-density nutritious feedstock both for the dairy and livestock sectors, and for the anaerobic digestion industry for energy production.

The Solution

Current alternatives include a huge increase in the use of bird scarers, with the accompanying noise pollution, or control of corvids by shooting; neither of which make sense in today's agriculture. A delay in the implementation of this end-of-year cut-off date would give the industry time to seek an alternative solution. Such delays have already been successfully implemented in the case of

chemicals under REACH legislation and for re-approvals of pesticides already registered for use. If that is not possible, a derogation on the use of the products under Article 53 (so-called emergency use) would also be possible. However, given the lack of success of initial discussions with CRD/HSE, a political solution to the problem needs to be sought urgently to initially highlight this issue and then to “encourage” DEFRA to increase the priority of the issue.

This is a big issue for Welsh farmers who grow nearly 15,000 hectares of forage maize a year. Members of the seed sector and other organisations including NFU, AIC, BSPB and NIAB are working together to seek a solution to this problem but DEFRA needs to understand that this is a serious issue and I wondered if you might raise this issue with the Welsh Government to ask the DEFRA Secretary of State to intervene on this matter.

I would be delighted to brief you further on this issue which I hope you will agree is a very serious one.

Yours Faithfully

A handwritten signature in black ink, appearing to read 'J. Little'.

Dr Julian Little FRSB

Tel: [REDACTED]

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