

# LETTERS

## TO THE EDITOR

### DEAR EDITOR,

PATRICK Mannix (*Forestry Journal* July 2018) is right to highlight the dangers to wildlife from insecticide spraying against OPM. His account is the most logical and rational dissection yet of the method and madness behind failing attempts to control OPM. FC's 2017 OPM Operational Plan Report said 114 of 350 sites sprayed in spring 2017 were still infested with OPM in summer. This year oak trees will have been sprayed in virtually every London Borough, most Surrey authorities and Essex, Buckinghamshire and Berkshire. In 2017 17,687 trees across 350 sites were sprayed in the Control Zone. This year FC sprayed 600 target sites in the Control Zone, a 71% increase on 2017.

Operators use BTK (*Bacillus thuringiensis* subsp. *kurstaki*), the most target-specific and environmentally benign of approved insecticide options. Nevertheless, BTK has potential to kill other lepidopteran species with a larval-stage window matching OPM. Prominent are oak-feeding larvae of green tortrix moth (*Tortrix viridana*) and winter moth (*Operophtera brumata*), main food sources for blue and great tit nestlings.

I am not aware of any area-wide research to determine the impact on non-target moth larvae and birds which prey on them. However, an impact was detected after aerial application of BTK against OPM at Pangbourne (West Berkshire) in May 2013. FC sprayed two SSSI woodlands (Herridge's and Broom Copses) by helicopter with BTK. Natural England demanded environmental assessments before and after spraying in treated and untreated control woodland (Horn's Copse).

Eleven times fewer green oak tortrix moth larvae were found in Herridge's copse after treatment compared with unsprayed woodland. Eight blue tits nests were identified in Herridge's Copse before spraying but only one family of blue tits post spraying. Respective figures for Horn's Copse were three nests and seven families. We will never know what effect BTK had on OPM because nobody thought to 'scout' the woodland prior to spraying to determine whether or not OPM was actually present.

It is naïve to believe there is no environmental impact from spraying BTK despite the biological insecticide being more targeted than the two 'hard' chemical alternatives. Research should be conducted to clarify. I strongly suspect blue tits and great tits are being hammered by destruction of non-target moth larvae on which they rely to feed their young. These are single-brood species with a large clutch of 8 to 10 eggs laid in April and hatching in May to exploit the abundance of oak-feeding moth larvae. Insecticide sprays could be destroying the whole broods with no second chance.

Yours,  
Dr Terry Mabbett

### DEAR EDITOR,

THE Health and Safety article in your last (July) issue raised a few eyebrows in our office. I was amazed to hear the Chair of FISA essentially say that all woodland owners put profit before human lives. Alistair Sandels' comments and the general tone of the article seemed to be in direct contrast to Sir Harry's statement that "we all need to participate in health and safety in a grounded way, talking sensibly".

The article suggests that the system of tendering work is flawed and that we should only be awarding work to our preferred contractors. Presumably only FISA-approved contractors would be acceptable, so it should be no surprise that FISA are in favour of a monopoly.

Aside from suggesting that landowners/agents are incapable of notifying interested parties of hazards within their tender documentation, the article also implies that professional harvesting operators are not capable of factoring these hazards and the control measures resulting from them into their prices. I agree that openness and fairness in tendering and pricing helps to ensure that there are no nasty surprises once operations begin. However, to my mind this is beneficial to all parties. Factoring health and safety into a tendering process is the norm not the exception. Indeed the rest of the article basically describes standard practice in the industry. If FISA can develop some training and guidance for new owners or contractors then that is to be welcomed, but most professional companies already have robust systems in place to vet contractors and ensure hazards and constraints are communicated to all relevant parties.

As an industry body, FISA should represent the entire industry. It is fundamentally detrimental to health and safety to encourage finger-pointing between various parts of the industry. FISA should not be encouraging a blame culture which makes people hide the reality of what happens in our forests. Instead they should be fostering an open, supportive culture where people can be honest about mistakes so that we can all learn from them. We are all responsible for health and safety should mean we are all responsible for health and safety - including FISA.

Kind regards,  
Claire Wightman, for Galbraith  
Old Edinburgh Road, Inverness

*Alastair Sandels, FISA  
Chair, writes in response to  
Claire Wightman's letter.*

### DEAR EDITOR,

I would like to again express my thanks to Sir Harry Studholme, Chris Marrow (agent) and Dave Radford of Kleen Kutt, for jointly planning and hosting the SW England Confor meeting in June. This was the second of what FISA hope will be a series of regional meetings to discuss safety in the forest. They ably demonstrated aspects of better practice in lowland timber harvesting and marketing safety risk management and I, along with those attending, hopefully learned something new. For example, seeing ' earmuff radios' for cutters on site was new to me!

Opinions about FISA have been both widely and frequently expressed in the press and social media, from its inception in 2013. Personally, I would far rather FISA communicate what it's changed or achieved, than what it hopes to achieve; except where it helps to point to the strategic direction of travel, or it raises awareness of changes to guidance and promotes learning. So this reply is my personal perspective and response to Claire's concerns, and I offer her sincere thanks for raising them...

It is a great privilege to Chair FISA and particularly to do so from a position of independence, having left employment in the UK forestry industry two years ago, after 35 years. New perspectives have offered new information and insight.

In the FJ July edition, I am quoted as saying that "contractors are angry at being on the receiving end of decisions that put them at risk". Landowners do not in my experience knowingly or deliberately put "profit before human lives"... However, having met one-to-one with agents, FWMs and contractors, and chairing meetings of the FISA Steering Group, I believe I am right

to have reached the conclusion that there are too many incidences where, through lack of understanding of Duty Holder responsibilities, effective planning, or due diligence, forestry workers, usually those harvesting and particularly those using chainsaws, are exposed to unnecessary risks; and that contractors are frustrated, often angry.

The last 12 months has seen unprecedented pressure on security of timber supply and continuity of work for contractors. This doesn't feel to me like a 'one-off' either? These pressures on time available to plan work are felt throughout the supply chain, and use of long-term contracts is not the norm in the private sector but spot-market selling is.

Let's not underestimate the pressure such a volatile market can have on contractors, particularly, or make glib statements about parties simply walking away if things change after a contract is signed, or someone misses something important in the fine print due to pressure of a two-week bid deadline from tender notification.

FISA's three-year strategic plan identifies its priorities, as part of its long-term strategy to eliminate death and serious injury from the timber supply chain. Firstly, for example, FISA is seeking to encourage and support landowners and agents both identify and also mitigate risk before they enter into commercial contracts for timber sale. Effective planning can take months and often years. Too often the market dictates the pace at which work is planned for.

If all timber sellers consistently insist on a site-specific pre-tender Q&A on safety planning with buyers and their contractors; timber sale contracts routinely contain preliminaries and contingencies and sums are set aside expressly for welfare provision; and maps are provided showing hazards and constraints - then we will have made great progress.

Secondly, FISA aims to support chainsaw users to develop and promote their

competence and establish a more level playing field on rates being paid; rates that adequately reflect the cost of resourcing and deploying safety controls and use of effective site communications, for example.

By consistently promoting 'safety before price' valuing competence of cutters and then achieving the standards expected and set by Sir Harry, Chris and Dave, we will make greater progress in reducing serious injury. We will keep learning and in due course agree new priorities, until we achieve the aims of the Accord.

It is a testament to the passion and enthusiasm of members that over 70, from all areas of the supply chain, freely give their time and energy to the work of FISA. All corporate and individual members can read the minutes of FISA Steering Group meetings and actions and priorities of Working Groups (in the members area of the website). When I re-read these this week, thinking about this response, it was evident, in my opinion, that firstly FISA's focus is increasingly on learning not blaming; not promoting members interests, not creating some sort of 'closed shop'. And there is an increasing openness and willingness, on behalf of industry leaders, to come together regularly, with the support of the HSE, to learn from both success and failure.

Not perfection by any measure, but progress? I don't expect anybody to take my word for it; ask a FISA Steering Group member for his or her view and communicate how we learn to do better?

Gillian Clark (FISA CEO) and I invite Claire and colleagues to meet on site and/or to attend FISA's next Steering Group meeting in September.

We encourage those who feel able to sign the Accord or support their employer in achieving the Accord aims, to find out how they can contribute by contacting: gillian.clark@ukfisa.com

Best,  
Alastair Sandels  
chair@ukfisa.com



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