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ROYAL  
BOTANIC  
GARDEN  
EDINBURGH



6 October 2008

Jean Waddie  
By email  
[Jean.Waddie@scotland.gsi.gov.uk](mailto:Jean.Waddie@scotland.gsi.gov.uk)

Dear Ms Waddie

**Re: Consultation on Future Management of Risks from *P. ramorum* and  
*P. kernoviae*.**

Thank you for the opportunity to contribute to the above consultation.

**About our organisation**

The Royal Botanic Garden Edinburgh is a world-renowned centre for horticulture, conservation, plant science and education. The RBGE extends over four Gardens (Edinburgh, Benmore, Dawyck and Logan) boasting a rich living collection of plants the most prominent of which is the Rhododendron collection. Over 57% of the collection is collected directly from the wild and the whole collection is recorded in a database.

Given the richness of the Ericaceae collection at the RBGE we introduced a *P. ramorum* Policy in 2004, whereby we Quarantined/Isolated new host plant material for 6 months on arrival. In February 2008 we introduced optional footbaths containing CleanKill© at the entrance to the gardens, making them compulsory in May 2008.

Apart from the extra cost and work load these measures have incurred, there has been no significant impact to the garden. The anticipated number of visitor has remained the same – the weather over the year has had more of an impact but the down turn of visitors is comparable to other visitor attractions in the area. Some visitors/staff have expressed an unwilling to use the footbaths and we have tried to combat this with interpretation explaining the impact Sudden Oak Death would have on the gardens.

As of Friday 19<sup>th</sup> September we have had our first confirmed outbreak on one plant at Benmore. Further inspections took place on Monday 22<sup>nd</sup> September and this confirmed another outbreak nearby. Due to these two very recent outbreaks it is too early to say what impact this may have on the collections and/or visitors at Benmore. As a result of these outbreaks we will be reviewing and updating our *P. ramorum* Policy.

### **Response to consultation**

The response below to the questions raised in the Consultation paper are based on both the DEFRA & SG-RDAC Consultation papers, the Consultation meeting held at SASA on 23<sup>rd</sup> September, The Scottish Government Phytophthora reports to 2006 and DEFRA SID5 Research Project (PH0195).

#### Question 7.2.

As there is so little information on the history and origin of *P. ramorum* and *P. kernoviae* we would treat both diseases the same, particularly in light of the impact either would have on the Garden landscaped of the UK, to say nothing of the UK Heath Lands.

#### Question 7.3.

Having looked at the distribution of *P. ramorum* and *P. kernoviae* and the recorded sites from 2002-2007 it seems to indicate that *P. ramorum* has been introduced through the nursery industry. Therefore, it would be important that the EU continue to take measures to prevent the movement of these pathogens both in the wider spreading of *P. ramorum* and in the prevention of *P. kernoviae* infecting the nursery industry.

#### Question 7.4.

Unless it can be confirmed that *P. ramorum* or *P. kernoviae* are native to a given area or that they have become so widely established that eradication becomes impossible, EU regulations should be maintained at their current levels. The EU should have regulations in place to stop the spread through the nursery industry for any disease. Inspections and Plant Passporting should be continued and unless the use of fungicides can be shown to kill *P. ramorum* and *P. kernoviae* both on the plant and the rooting media, they should not be used prior to transportation. With non-EU countries, consignments should continue to be inspected with a Phytosanitary certificate or undergo Quarantine containment untreated for six months.

#### Question 7.1.

With the EU revising their protocols it would be difficult to comment on regulations that may change. The EU standard at the moment is aimed at the eradication from the nursery industry and the containment in gardens or the 'wild' does not look to be unattainable given the number of eradicated cases so far. However, given the diversity of host plants, a complete ban on importing them would have a considerable impact on the horticultural industry.

It is tempting to wait a further 2 years to see the development of the disease, given that after 6 years England & Wales have only eradicated 29% of their infections and

Scotland 42% in managed land. It would help to know how long the successfully eradicated sites took to achieve this success.

Given the effect the disease could have on native habitats containment/eradication seems to be the best course of action. Certainly removal of *Rhododendron ponticum* thickets should be targeted around infected sites although whether it would be necessary to remove individual varieties that are not infected and out with the 10 meter perimeter would be difficult to advise.

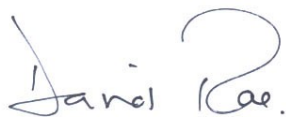
All infected sporulating host plants should be burnt *in situ* and paths around these sites should be closed to the public with the minimum of horticultural work taking place (except the lifting & burning of leaf litter and infected plants). Although the 'jury is still out' on the benefit of public footpaths, their use at infected sites should be encouraged as a way of focusing the public's mind on the potential impact and spread of the disease.

Infected historical plants should not be treated any differently to other sporulating hosts. Historically significant plants could be protected by clearing the area immediately around them of host plants and leaf litter. They could also be micro-propagated to save the genotype. Historic plants are typically old and while there may be no "collection" information data linked to them they could be from areas where they no longer exist in the wild and are therefore genetically valuable.

If eradication and containment is to be achieved it would help to know what sites were infected. Given that they must put notices at their entrance it seems to be odd that the information is not made available to interested parties within a week or two of the notice being issued.

There still seem to be a lot of unanswered questions in relation to the spread of the disease from area to area given the managed land geographical location.

Yours faithfully

A handwritten signature in blue ink that reads "David Rae". The signature is written in a cursive style with a large, looped 'D' and 'R'.

**Dr David Rae**  
**Director of Horticulture**