



Llywodraeth Cymru
Welsh Government

Number: WG49772

Welsh Government
Consultation – summary of response

Revision of the Code of Practice to Prevent and Control the Spread of Ragwort

April 2024

Mae'r ddogfen hon ar gael yn Gymraeg hefyd / This document is also available in Welsh
Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg / We welcome correspondence and telephone calls in Welsh

Overview

The Welsh Government Code of Practice to Prevent and Control the Spread of Ragwort (“the Code”) aims to prevent and control the spread of common ragwort only where it poses a threat to the health and welfare of grazing animals. The existing Code was published in 2011. We proposed to make changes to bring the Code up to date. The amendments include:

- updating the names of organisations and relevant contacts
- updating references to legislation and legal requirements where new legislation has been introduced
- changes relating to advice around best practice measures

This document provides a summary of the responses received to the consultation on proposed revisions to the Code.

Action Required

This document is for information only.

Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

Contact details

For further information:
Landscapes, Nature and Forestry Division
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

Email: plant.health@gov.wales

Additional copies

This summary of response and copies of all the consultation documentation are published in electronic form only and can be accessed on the Welsh Government’s website.

Link to the consultation documentation: [Revision of the Code of Practice to Prevent and Control the Spread of Ragwort: consultation document \(gov.wales\)](#)

Contents

Contents.....	3
Introduction	4
Overview of responses to consultation.....	4
Consultation responses.....	5
Government response and next steps.....	10
Annex 1	11
List of respondents:	11

Introduction

The aim of the Code of Practice to Prevent and Control the Spread of Ragwort (“the Code”) is to prevent and control the spread of Common ragwort only where it poses a threat to the health and welfare of grazing livestock. This guidance does not seek to eradicate Common ragwort, as it is a native plant which is important for biodiversity. It seeks to find a balance between the needs of landowners and occupiers grazing and feeding their livestock, and the need to protect biodiversity. The existing Code was published in 2011. We therefore wish to update the document.

Prior to consulting we reviewed the document and liaised with the Animal Welfare Network Wales Group for their initial input in order to make the proposed revisions to the document. The proposed revisions included updating the names of organisations and relevant contacts, updating references to legislation and legal requirements where new legislation has been introduced since 2011 and changes relating to advice around best practice measures.

A [consultation](#) consisting of five questions was launched on the Welsh Government website on 23 October 2023, and closed on 15 January 2024. The consultation asked people if they thought it was necessary to update the Code, if they agreed with the proposed changes, if there were any specific changes they disagreed with, if they had any suggestions about additional changes that could be made, and if they had any related issues which the consultation did not specifically address.

Overview of responses to consultation

There were 26 responses submitted in response to the consultation. Some responses did not include an answer to every question.

The consultation response forms were available in Welsh and English and with individuals able to respond in their preferred language. All responses received were in English.

Respondents were able to respond using the Welsh Government’s consultation webpage or download a response form and submit it to a designated electronic mailbox. An overview of the split in these responses is included below.

Responses submitted online	22
Responses submitted via email to the plant.health@gov.wales mailbox	4

A breakdown of the type of respondent is provided below:

Affiliated with an organisation/NGO	10
Unaffiliated with an organisation/NGO	16

Consultation responses

Question 1. Do you agree it is necessary to update the Code of Practice to Prevent and Control the Spread of Ragwort (“the Code”)?

Q1			
	Yes	No	Not answered
No. of responses	23	2	1
% of responses	88%	8%	4%

The vast majority of the 26 respondents (88%) agreed that ‘yes’ the Code did need to be updated. One respondent (4%) did not answer the question, and two (8% of respondents) said that the Code should not be updated.

The majority of people who responded ‘yes’ to this question, did not give an explicit reason in this particular section. Where reasons were provided as to why the Code should be updated the responses varied greatly. One response stated that government policy should be evidence-based and formulated on peer-reviewed science, perhaps indicating their opinion that the current Code didn’t meet these criteria. Another response stated that the Code is outdated and must be amended in such a way to help farmer’s property from being exploited by the non-action of neighbouring landowners. A further response stated that the way the Code is currently written is “biased”, “prejudiced” and “ignorant”.

Of the 2 who responded that the Code did not need to be updated one believed the guidance should be scrapped completely as it distracts from other causes of equine / bovine liver disease. The other wrote that they have primitive sheep that appear to clear ragwort when it flowers without them coming to any harm.

Example responses

“Yes. There are many myths and misunderstandings associated with the control of ragwort. Greater clarity is needed.” **Bumblebee Conservation Trust.**

“The choice is not between updating the guidance or leaving the current guidance in place, but whether any guidance should exist at all. The focus on Ragwort distracts from other causes of equine / bovine liver disease.” **Individual.**

“We welcome the opportunity to comment on the changes being suggested to the code. Clearly looking at the previous version of the Code of Practice this is now necessary as the information is well out of date.” **NFU Cymru.**

Question 2. Do you agree with the proposed changes that have been made to the Code?

Q2				
	Yes	Partially agreed	No	Not answered
No. of responses	10	13	1	2
% of responses	38%	50%	4%	8%

This question was answered by 24 of the 26 respondents. Of those who responded 10 (42%) responded to the question with a simple 'yes'. The remaining responses varied greatly, with some people responding they agreed with some of the changes, some saying they agreed with most of the changes, and some saying that there were still many problems with the way the proposed updated Code is written. One respondent answered 'no', citing contradictions between the main body of the Code and the appendices.

There was a noticeable difference in the tone of response between those organisations and individuals concerned with biodiversity who thought the Code was either unnecessary or was too 'anti-ragwort' and those more concerned with horses and livestock and the potential harms ragwort could cause to them.

For example, one respondent believed that the changes could result in an increase in ragwort and more of the associated problems with livestock, whereas another respondent believed the proposed changes to be practical. Another respondent had no major concerns with the changes suggested to the Code and welcomed the reduction in emphasis on land owners' / occupiers' need to respond to presence of the plant by removal or eradication of the plant, and the additional emphasis placed on *consideration* of control rather than a *necessity* to control.

Example responses

"Largely welcome the direction which seems to generally recognise the need for pragmatism and the benefits of ragwort within our ecology." **The Woodland Trust.**

"Apart from the changes to the relevant organisations and contacts the FUW do not agree with the changes where the language makes it almost 'optional' whether or not to control Ragwort. The FUW believe that the changes could result in an increase in Ragwort and more of the associated problems with livestock." **Farmers' Union of Wales.**

"Buglife welcomes the proposed changes to reduce the demonisation of Ragwort and the increased recognition of the plant for its importance to biodiversity." **Buglife.**

"In general you've made changes because of changes in the law etc. Apart from these I can only agree with you where the issue of it being poisonous to the touch has been debunked. You are still repeating attitudes from the people who originated that myth. The story that ragwort is poisonous to the touch is a scare story."

Swansea Friends of the Earth.

Question 3. Do you disagree with the proposed changes that have been made to the Code? Are there any specific changes you disagree with and why?

Q3			
	Yes	No	Not answered
No. of responses	13	9	4
% of responses	50%	35%	15%

4 people did not respond to this question. Of those who did respond 9 (41%) said 'no'. 8 of these 9 responses were a simple 'no' whereas one response expanded further on their answer expressing their approval of the fact that ragwort's value for wildlife and biodiversity had been further highlighted.

The remaining 13 responses varied widely but the majority fell into one of two camps: either they thought that the changes made either didn't go far enough to promote biodiversity and the value of ragwort, or they thought they didn't go far enough to protect horses and livestock from the potential dangers of ragwort. For example, one respondent made several suggested changes throughout the text which indicated that he thought the proposed revisions didn't take the threat of ragwort to horses seriously enough when updating the Code and that the language on ragwort control had been weakened without good reason. A similar response was given by two other respondents. However, there were other responses which indicated that they thought the updated Code placed far too much weight on the potential dangers of ragwort, and that in many situations it is of no danger to horses and other livestock with small doses unlikely to do any harm. There was also one person who commented that no effort has been made to assess the extent to which ragwort is a problem.

Example responses

"No, the amendments all seem sensible and it is good to see that the value of the plant for wildlife and biodiversity is highlighted." **Individual.**

"Yes. We are concerned that most of the wording regarding ragwort control where there is a medium to high risk to grazing animals/forage production to be changed from "control must be implemented" to "control may need to be implemented/considered". **British Horse Society.**

"This (that in many situations ragwort poses a low Instead of no threat to horses and other livestock) is clearly an incorrect change that is incongruent with the evidence. In many situations ragwort is of no threat. It is toxic in percentages of body weight, with small doses unlikely to harm. Preserved forages are the problem not the living plant or a plant growing some distance away." **Swansea Friends of the Earth.**

"We get the point that it has environmental benefits, but it is a plant that needs to be kept under control not least to prevent economic losses and welfare issues from its poisoning effects." **NFU Cymru.**

"There's too many paragraphs where "must" is removed by "should", where it is the duty to remove ragwort the word "must" is to stay, otherwise actions to remove ragwort will be futile and hold no legal status, the word "should" is not enough to enforce action on any perpetrator in the guidance for ragwort." **Individual.**

"P31 para 13 Given the very high degree of risk presented to horses and other animals by the presence of ragwort in grassland for forage production, why has the stronger 'must' been replaced with the less strong 'should' in reference to taking control measures?" **RSPCA.**

Question 4. Do you have any suggestions about additional changes that could be made? Please provide them here along with the reasoning for your suggested changes.

Q4			
	Yes	No	Not answered
No. of responses	18	3	5
% of responses	69%	12%	19%

Out of the 26 respondents to the consultation, 8 (31%) either did not answer this question (5 respondents) or answered that they had no suggestions about additional changes that could be made (3 respondents). Of the 18 (69%) who responded that they did have suggestions about additional changes, the split in theme of answers was similar to that of question 3. For example, two individuals and one organisation believe the Code should be explicit in stating that under the Wildlife and Countryside Act 1981 (as amended) it is a criminal act to uproot any wild plant (including ragwort) without the landowner's or occupier's permission. One respondent was of the opinion that the risk to grazing animals from ragwort in fields is overstated throughout the document and suggested that the document needs to be rewritten. One organisation also made several suggested changes which would make the Code more 'pro-ragwort'.

Other respondents thought the updated version of the Code didn't go far enough to point out the dangers of ragwort to horses and livestock. For example, one organisation thought that the wording was not strong enough in favour of ragwort control in a lot of cases, suggesting that action to prevent its spread *must* be taken where ragwort poses a high risk to land used for grazing, or forage production. Another two individual respondents were of the opinion that councils should keep ragwort free from roadside verges as the seeds can blow into nearby fields. Another organisation commented that any control of ragwort should prioritise using non-herbicidal methods. One individual believed that some attention should be given to the hypothesis that quarries have been a cause of spread of ragwort with stones from quarries that are used for forestry tracks and road surfacing contributing to its spread. One individual respondent expressed their concern with the example of a neighbour who grows ragwort on their land and rents that same land out to a riding school. They wondered why this is allowed to occur.

Example responses

"The code does not suitably address the Wildlife and Countryside Act and the illegality of uprooting ragwort without landowners' permission. The code should be strengthened to make it clear that it is illegal to uproot any wild plants (including Ragwort) without landowner's permission to prevent the inappropriate removal of the plant. There are cases of people removing wild plant species including Ragwort on nature reserves where, misled by inaccurate information about the plant, they think they are doing the right thing." **Buglife.**

"It needs to be rewritten!" **Swansea Friends of the Earth.**

*“There should be the option to enforce Ragwort control where they pose a risk to livestock grazing nearby.” **Farmers’ Union of Wales.***

*“Removal of the term ‘infested’ from the opening sentences, it suggests any presence of ragwort is an ‘infestation’”. **Bumblebee Conservation Trust.***

*“I think that the councils should keep the verges free from Ragwort and seeds blow into fields.” **Individual.***

*“Make people responsible to remove ragwort. In Worcestershire they have ragwort clearing day which encourages volunteer groups to help clear the ragwort. Some needs to be left to help the Cinnabar moth.” **Individual.***

*“Non-herbicidal methods should be favoured, to reduce the chemical usage in our landscape, as the impact from this could be equally as negative as any impacts from ragwort?” **The Woodland Trust.***

*“My neighbour grows ragwort on her land like a cash crop. She did spray it a few years back at my request, but it was so established it soon grew again. She rents out this land to neighbouring Riding School, horses are always grazing there. It blows over on to my land and I am constantly digging it up. Why is this allowed? How does the Riding School get a Licence when the horses are at risk?” **Individual.***

Question 5. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

This question had the least engagement, with only 6 respondents (23%) giving an answer. In one case one individual simply referred back to the answer given in question 4 surrounding his concern of quarries being a potential cause of spread of ragwort. One individual wanted to make clear that ragwort was in fact a real danger to horses by writing that their children’s horse had died as a result of ragwort poisoning, whereas another individual was concerned with how neighbouring landowners and those in industry who allow ragwort to reach ‘infestation levels’ are held responsible.

One organisation took the opportunity to suggest that The Weeds Act 1959 should be repealed or at least reviewed considerably. They suggested that changes in modern farming practices have rendered the original purposes of the Act obsolete, and that the Act is further accelerating the decline in populations of invertebrates within the UK. In contrast another individual believes the fines delineated in the Weeds Act 1959 are too moderate. One organisation made several points indicating he believed there were many errors throughout the document, with the dangers of ragwort constantly being overstated and based on insufficient evidence. For example, he suggested there was no threat to animals simply from grazing ragwort as long as they are well fed and stating that the only other way it could become harmful to grazing animals is if it were given to them as part of preserved forage.

Example responses

*“My children's pony died from liver failure due to eating ragwort.” **Individual.***

*“More detail in how legal enforcement processes are taken on those responsible (neighbouring landowners particularly those who own horses, Principal Contractors managing construction sites, Highways, local authorities and Transport for Wales rail) for allowing ragwort to get to infestation levels.” **Individual.***

“Invertebrate populations are undergoing catastrophic declines within the UK - with pollinators amongst the hardest hit. The Weeds Act 1959 was devised to tackle widespread plants which at that time had no effective control strategy and risked harming food production. When agriculture was less sophisticated than it is today and there was little scientific justification even then for the five native wildflowers it targeted. Changes in modern farming practices, have rendered obsolete the original purpose of the Weeds Act. There is no evidence that the spread of any of the listed species poses a threat to modern agriculture. Under section 7 of the Environment (Wales) Act 2016 Welsh Ministers must take all reasonable steps to maintain and enhance listed species; repealing the Weeds Act in Wales would appear to be such an action.” **Buglife.**

“The only serious problem occurs when ragwort is incorporated into hay or when animals are mistreated and forced to eat anything due to starvation and it is this you should be focusing on. The scientific literature is absolutely clear on this. It supports what we actually see where ragwort is growing where cattle or horses are grazing. They do not like to eat it fresh and avoid it.” **Swansea Friends of the Earth.**

Government response and next steps

We welcome all of the responses to our consultation. We have received a range of opposing views from those proposing the guidance in the Code should take more account of animal welfare and those who propose that biodiversity measures should be prioritised. We will continue to consider the responses in order to produce a final version of the Code for publication.

Annex 1

List of respondents:

British Horse Society
Buglife
Bumblebee Conservation Trust
The Donkey Sanctuary
Farmers' Union of Wales
Gwlad National Farmers Union Cymru
RSPCA
Swansea Friends of the Earth
Woodland Trust
16 individuals