



# Problem formulation for the environmental risk assessment of weed biological control agents: Insects and fungi versus weeds.

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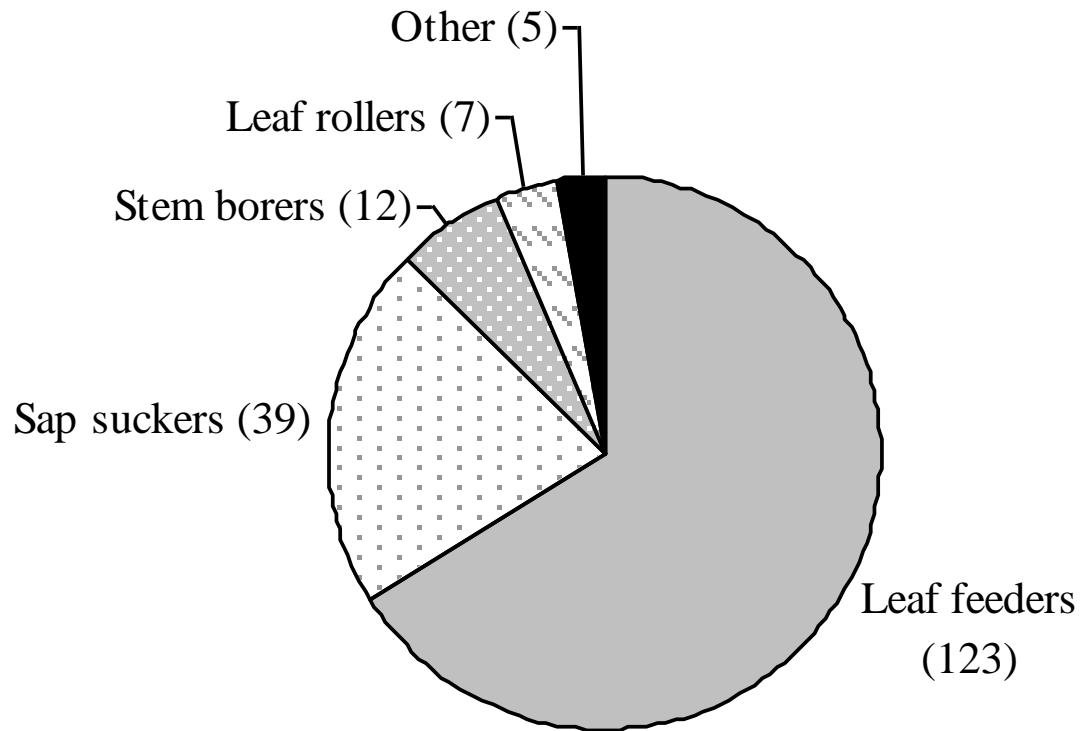
PRIVATE ROAD  
NO PARKING  
NO THROUGH TRAFFIC





# Many insects feeding on most parts

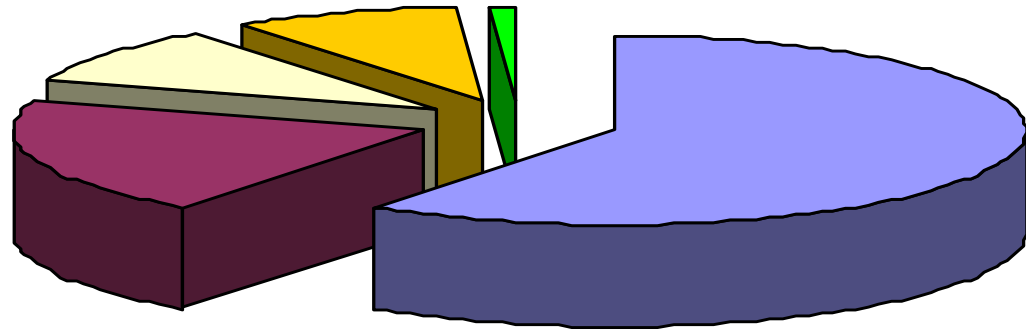
**186 species of  
phytophagous  
arthropod  
recorded from  
Japanese  
knotweed in  
Japan. Plus 40  
fungi**



## Unfair Advantage

- They arrived without the natural enemies that keep them in check in their native range. “Enemy Release Hypothesis”
- Those native species which do attack them do not cause enough damage
- **Some** of the many insects and diseases in the area of origin may be safely released as classical agents

# A process of elimination



- literature review
- field observations
- suceptibility studies
- host range tests
- suitable



*Aphalara itadori*





*Mycosphaerella polygoni cuspidati*

## 2 Categories of weed control

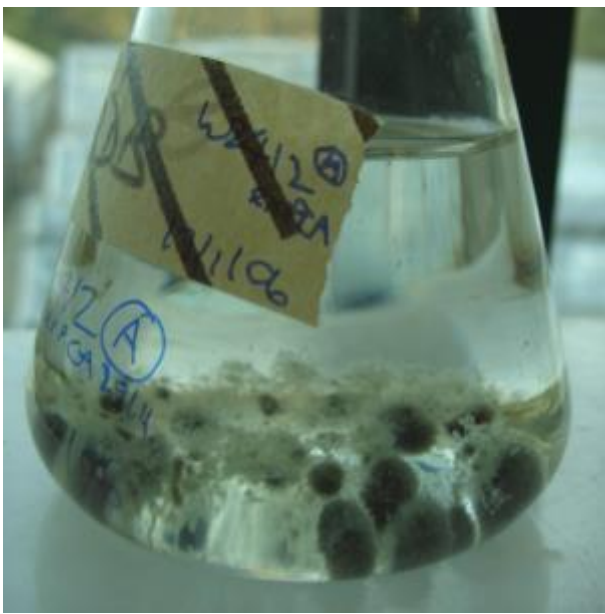
**Inundative** - a.k.a the “Mycoherbicide Approach” using normally native pathogens for repeated application

**Classical** - Using Co-evolved (highly specific) NEs from the area of origin of the plant to provide self-sustaining control after a single release.

# The Inundative Approach

- Used in high value horticulture, agriculture, golf courses to reduce chemical input/ combat resistance
- Or where conflicts of interest would exclude classical natural control

Better described as **COMMERCIAL** as applied like a chemical product from a bottle with a **label** and a user and is **always formulated**.



- *Mycelial broth*



## Knotweed mycoherbicide

- Failed host range testing as a classical agent due to risk to an important non-target plant species
- However, a mycelial preparation of a single mating type of *Mycosphaerella* **cannot** infect NTs
- UK and International Patent applied for in the name of UK Secretary of State
- UK Patent Application No. 1503510.8; <https://www.ipo.gov.uk/p-ipsu/Case/ApplicationNumber/GB1503510.8>
- Next Proof of Concept
  
- PRA complete and risk to environment close to zero but experimental license process proving hard to pin down
- Needs to be released from PH quarantine licence and then field trials need to be authorised

# Inundative Weed biocontrol = Low Risk Substance?

*Products authorised as a low-risk plant protection product provided no specific risk mitigation measures are needed following a risk assessment.*

## Substance not classified as:

- explosive
- corrosive
- sensitising chemical
- very toxic or toxic
- CMR substance
- endocrine disrupter
- neurotoxic or immunotoxic
- persistent (half-life in soil >60 days)
- bioconcentration factor >10

If not...



## Safety requirements:

- Physical – chemical properties
- Analytical methods
- Toxicology
- Residues
- Environment: Fate and Behaviour
- Ecotoxicology
- Efficacy

*Aphalara itadori*



# GENERALIZED MODEL OF BIOCONTROL OF INVASIVE PLANTS (adapted from Luck et al. 1995)

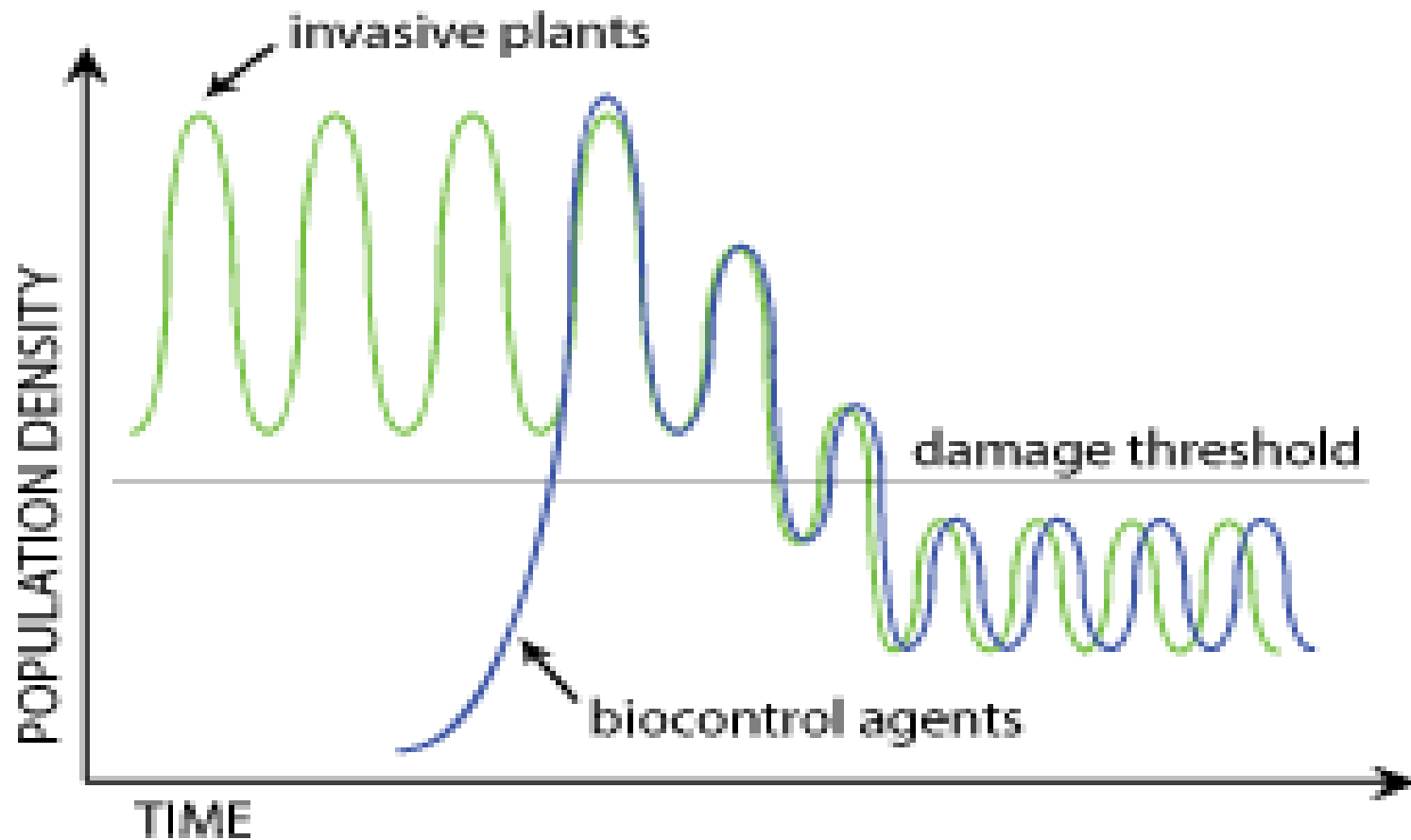


Diagram created by weedcenter.org

# *Eichornia crassipes* – Water Hyacinth

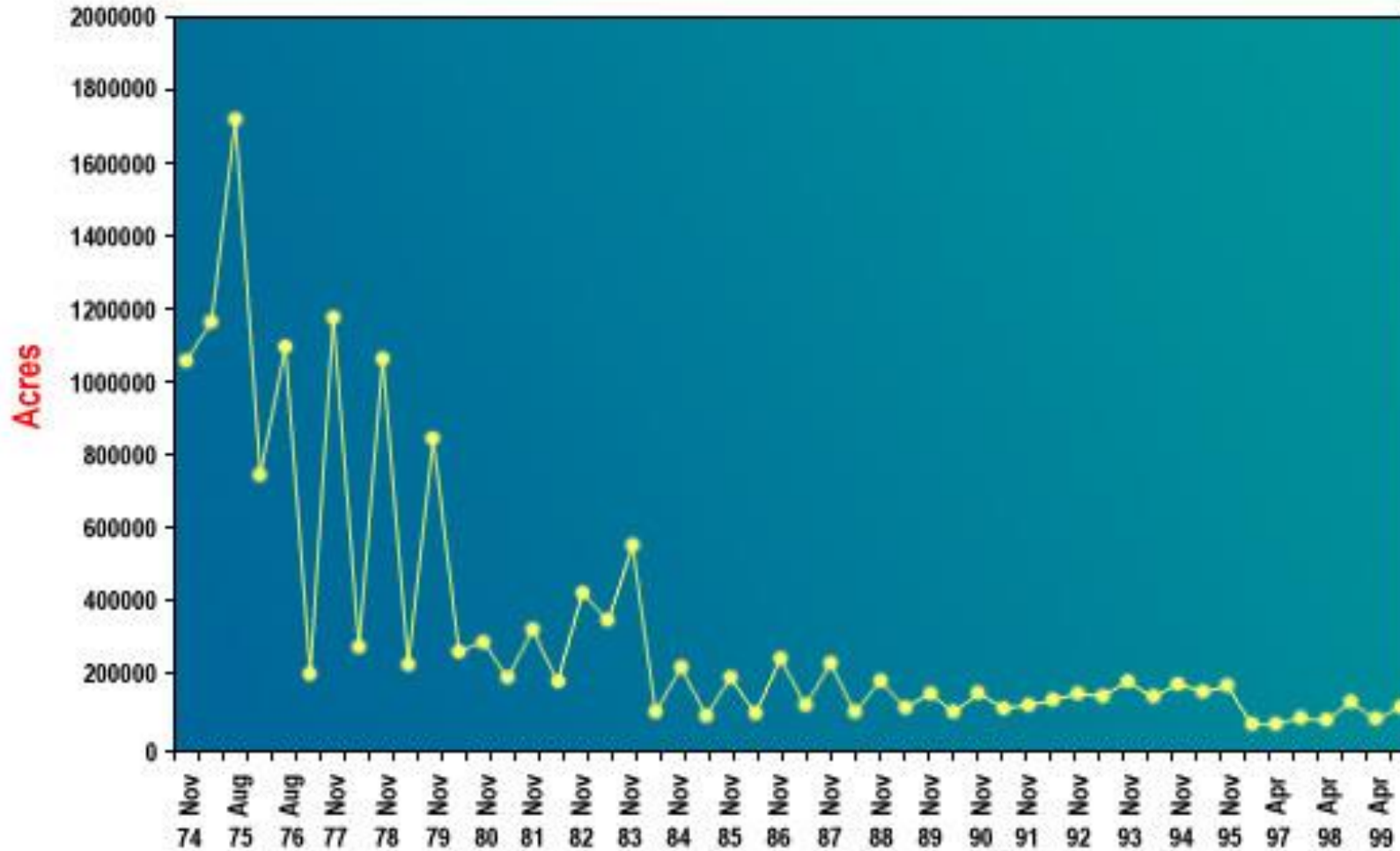


*Neochetina eichhorniae*  
Mottled water hyacinth weevil  
Copyright 1997 USDA-ARS



# The real sequence of events

Louisiana Waterhyacinth Data



Graph courtesy of APHIS

## Is It Safe?

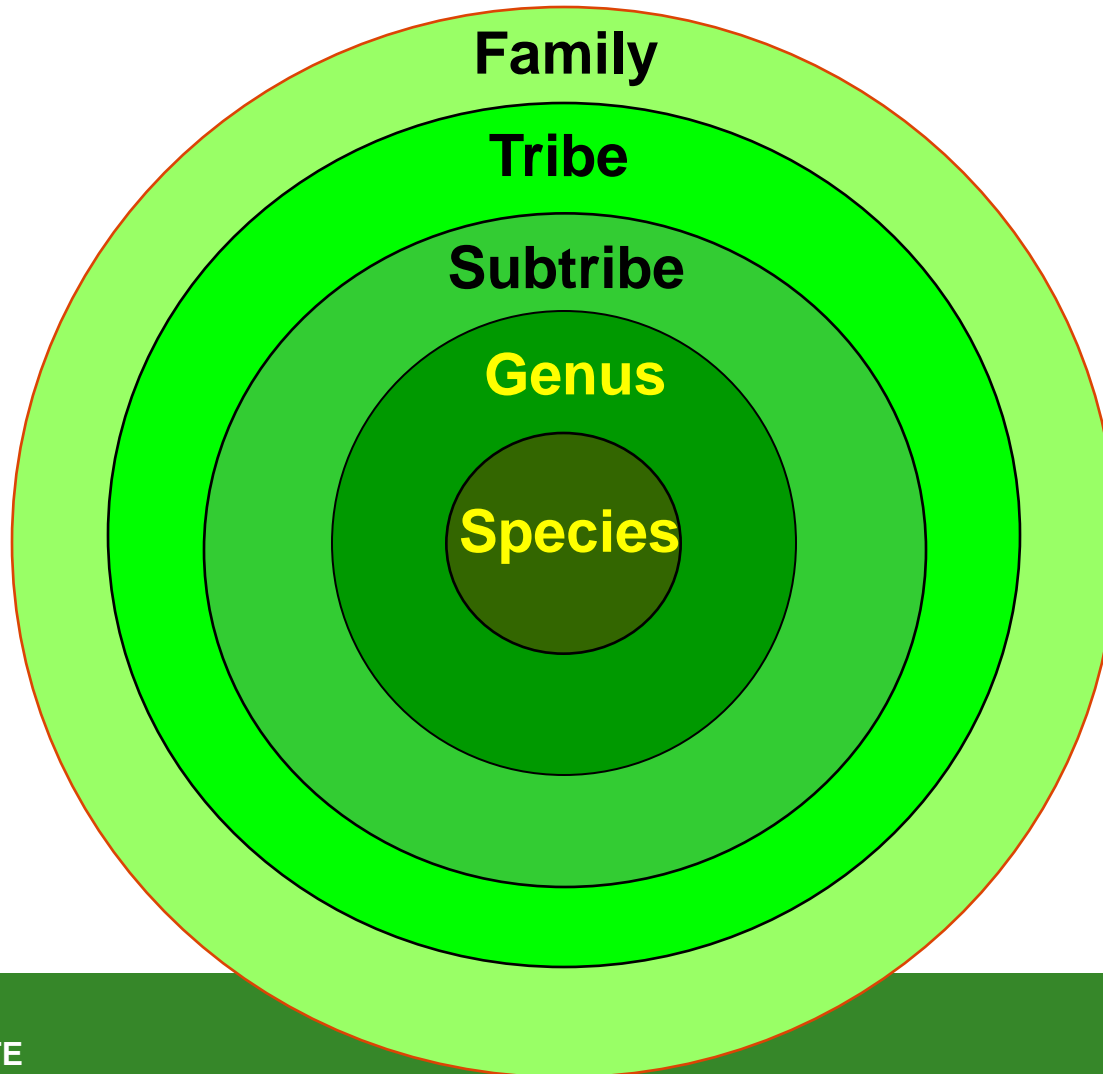
Over more than a century there have been >1,500 introductions of >450 different BCA species vs. 175 weeds around the globe.

- Any non-target effects are predictable by the vigorous safety testing
- Guided by an International code of conduct [ISPM 3](#)
- 8 examples of “non-target” effects
- Most of these predicted by the science then, or would have been predicted by the science now

cf Europe pest control: >300 releases of 176 BCA species against crop pests **outside the glasshouse**

# Centrifugal phylogenetic method:

Species more closely related to the target weed are more likely of being attacked than more distantly related ones







# Oviposition Tests





## Development Tests



# Testing Biotrophic Fungi

## Dew Chamber

- Constant dew period at perfect temperature for 48 hours
- Optimum conditions for infection
- Very high inoculum load
- Precautionary principle

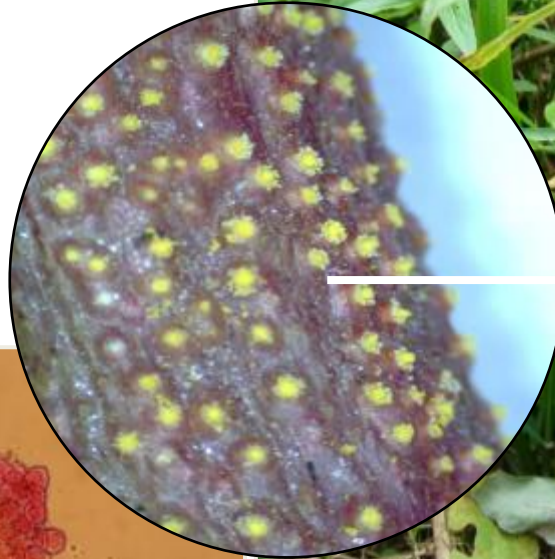


# Himalayan balsam



# Himalayan balsam seedling infected with rust aecia

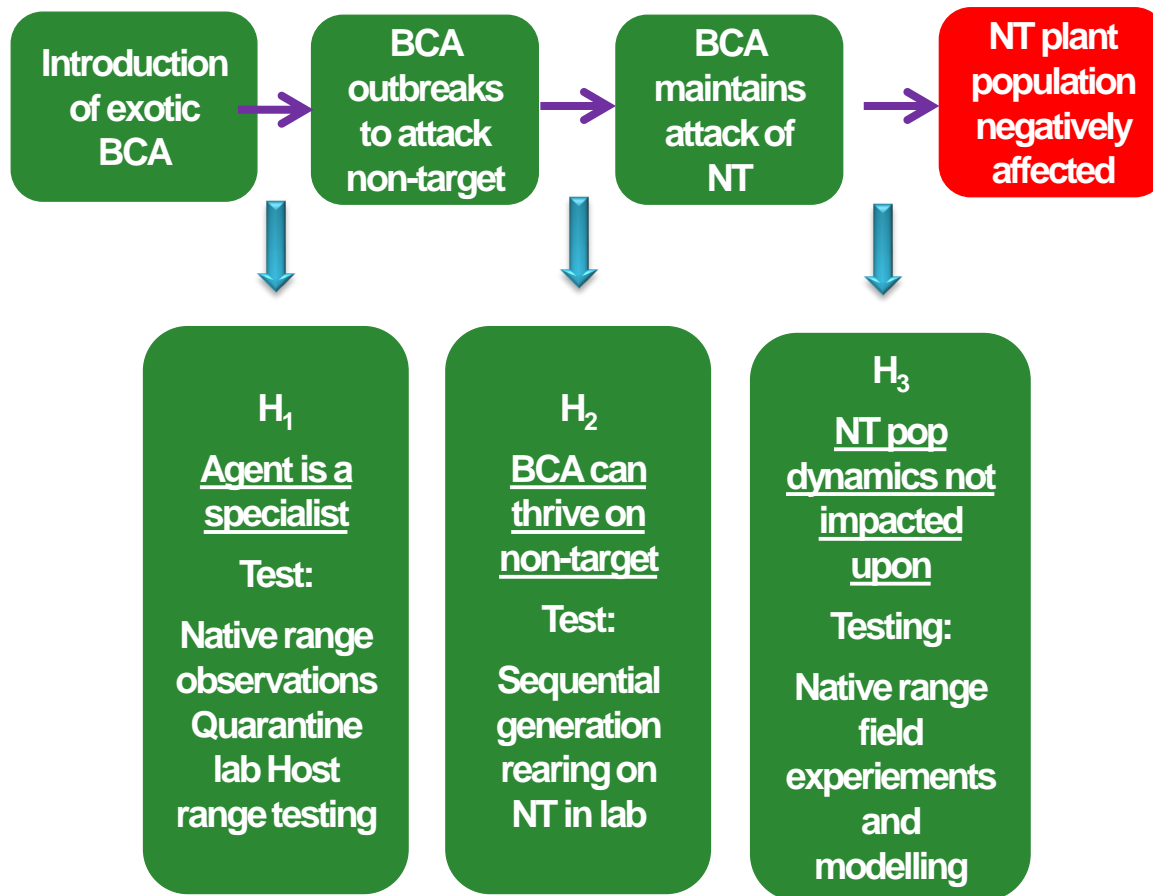
Aecial cup containing chains of aeciospores



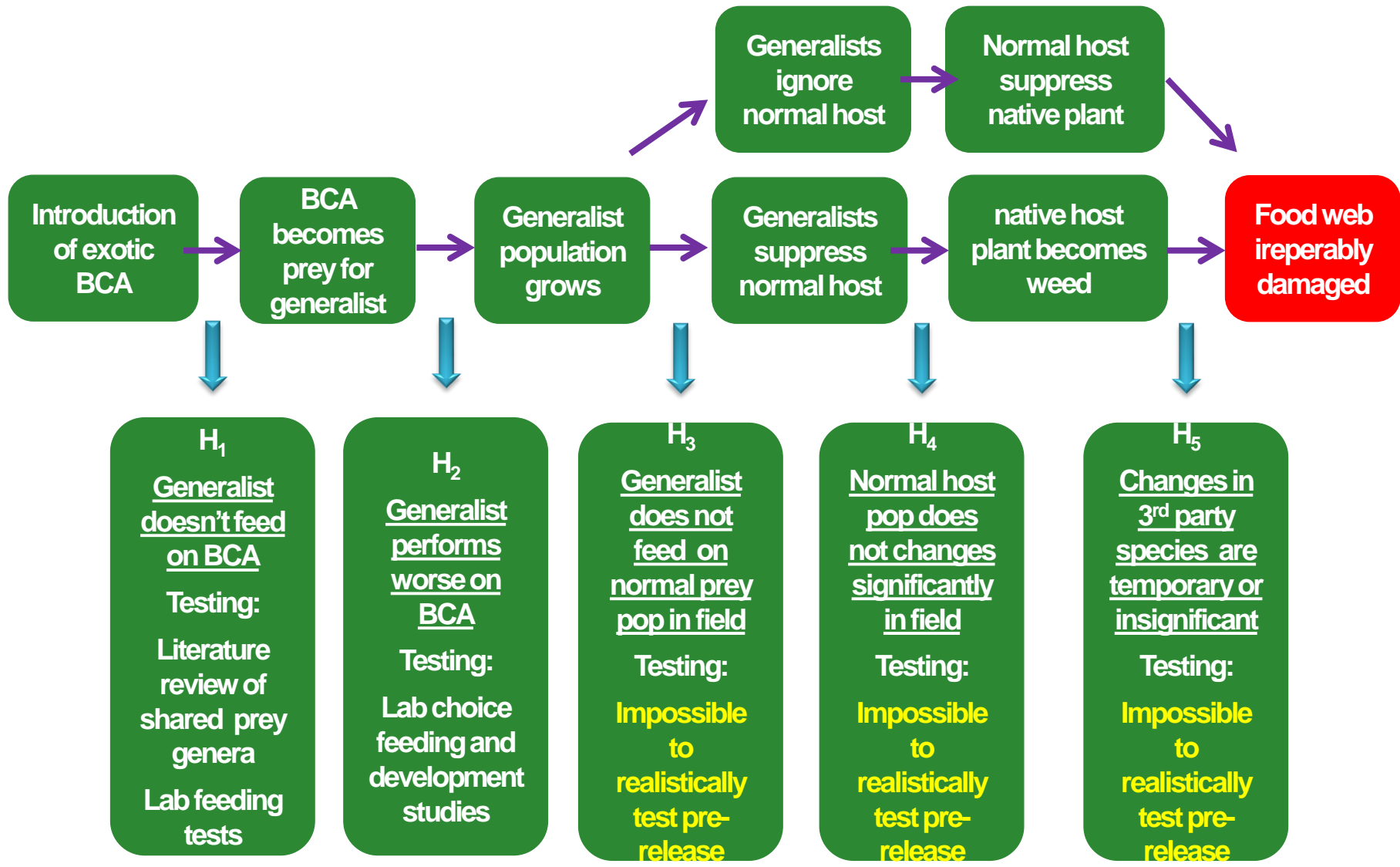
# Mostly done in quarantine



# Problem formulation: CBC – Direct effects



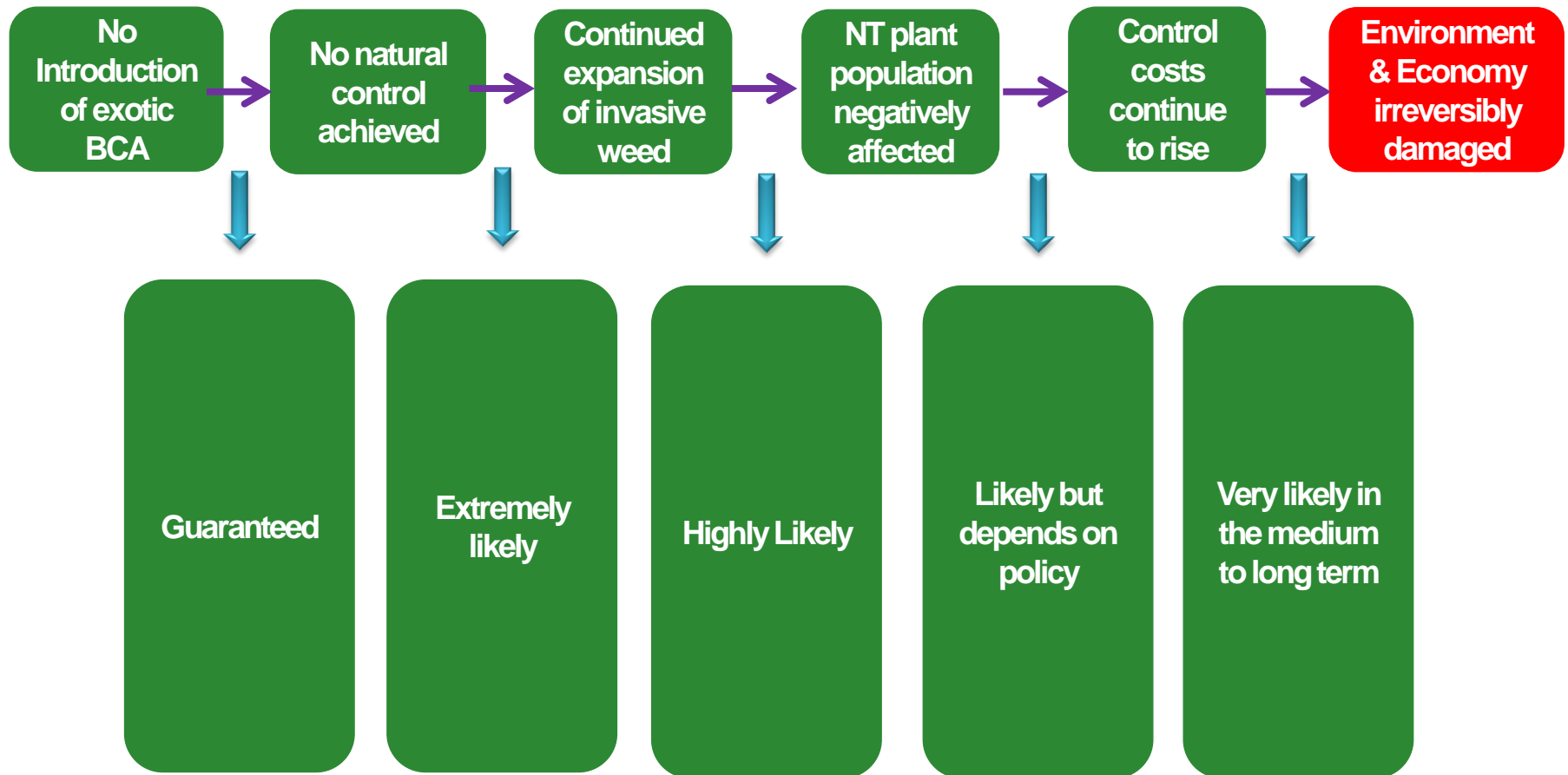
# CBC– Indirect effects (Apparent Competition)



# The problem of false positives from the Lab


- Native range field observations give a good indication of agent host range BUT the key non-targets are not normally present, can occasionally get permission to plant them.
- Insect host range studies start with no-choice/starvation tests and reveal the **FUNDAMENTAL** host range not the **REALISED** host range post release. This is normally much larger
- Quarantine lab studies are precautionary and give a worst case scenario
- E.g. rubber vine in Australia where 40,000km<sup>2</sup> of ecosystem have been saved by a rust fungus that attacked a rare native plant in the lab but didn't in the field in outbreak conditions.

# Doing nothing



# EFSA now has experience with CBC

**STATEMENT**

 EFSA Journal

ADOPTED: 29 May 2015 PUBLISHED: 19 June 2015  
doi:10.2903/j.efsa.2015.4134

**Statement on the assessment of the risk posed to plant health in the EU territory by the intentional release of biological control agents of invasive alien plant species**

**EFSA Panel on Plant Health (PLH)**

**Abstract**

Classical biological control has been successfully used in various continents to manage many invasive alien plants originating from Europe, but this approach is still not widely adopted in Europe, despite its advantages (sustainable, effective, efficacious, good safety record) compared to chemical and manual control of weeds. Following the publication in April 2015 of the EFSA PLH Scientific Opinion on the risk posed to plant health in the EU by the intentional release of the bud-galling wasp *Trichilogaster acaciaelongifoliae* for the control of the invasive alien plant *Acacia longifolia*, the EFSA PLH Panel is publishing this statement on the procedure to follow should similar requests be made in future. Ideally what is required for an EFSA Opinion on a risk assessment of a BCA release is: (i) host specificity tests of a plant list agreed in advance by an appropriate body; (ii) a risk assessment for plant health produced using a standardized template for the whole of the EU or at the least for an appropriate bi-climatic area within the EU; and (iii) consideration of benefits. This process could be facilitated by an expert working group that would be available to advise the applicant at regular intervals. The role of EFSA is best suited to providing a peer review of a weed BCA risk assessment for the EU considering that peer review of applications prepared by researchers specialized in a particular BCA is the procedure adopted for BCA risk assessment in the countries that have much experience with using exotic BCAs of weeds. Following the appropriate International Standard for Phytosanitary Measures (ISPM) 3 and European and Mediterranean Plant Protection Organization (EPPO) Phytosanitary Measure (PM) 6/1 standards will help the releasing authority manage the process. Post-release, as per EPPO PM 6/2, all appropriate safety procedures should be put in place.

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- Experts should **review** the risk assessment
- This is an intention to release not a product for sale
- Needs to be quick
- Needs to include benefits



# Conclusions

- Biocontrol is an option for even the worst invasive weeds
- Classical biocontrol is finally growing in Europe
- EU Invasive Species Regulation should drive CBC
- Current safety testing means that we are more likely to reject a good agent than release a dangerous one
- The regulation for biologicals is not ideal and if we are to have alternatives to chemicals then low-risk products need an easier passage
- There is a need for balance i.e risk:benefit because with invasive species...

**DOING NOTHING IS NOT A LOW RISK OPTION**

## Risk of doing the wrong thing: Water Hyacinth in the Guadiana river in Spain



Wiser to spend 5% of that budget on finding a cold tolerant strain of the legendary *Neochetina* biocontrol agent so there is a back up plan when it comes back?

شكرا جزيلًا  
mercì  
शुक्रिया  
zikomo  
xie-xie  
obrigado  
efharistó  
merci  
zi komo  
gracias  
zi komo  
asante  
thank you  
urakoze  
danke  
terima kasih  
dhanyawaad  
ke itumetse  
tak

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