



15 October 2025

Dear Sir/Madam

RE: Response to the policy review for *Helicoverpa armigera*

Thank you for submitting views on the policy review which assessed the quarantine status and current regulations of *Helicoverpa armigera* in Great Britain. This letter is to notify you of the outcome.

Recommendations

The policy review concluded that the deregulation of *H. armigera* is deemed the most appropriate next regulatory step for this pest.

Background

Helicoverpa armigera (Lepidoptera: Noctuidae), commonly referred to as the cotton bollworm, is a pest of many important crops worldwide. This species is characterised by its global distribution, a wide host range and the exceptional dispersal abilities of adult moths. Globally the most important crops impacted by *H. armigera* are tomato, cotton, pigeon pea, chickpea, sorghum and cowpea (Lammers & MacLeod 2007). Other crops of particular importance to GB are maize, potatoes, chrysanthemums and pelargoniums.

Helicoverpa armigera is regularly intercepted on imported plant products such as vegetables. The phytosanitary risk to GB from plant products infested with *H. armigera* is considered to be low as *H. armigera* is very unlikely to be able to complete its development on imported plant products and then transfer to vulnerable host plants. In addition, it is predicted to be unable to establish outdoors in GB.

In addition to the regular interceptions of *H. armigera* on imported plant products, two transient populations of *H. armigera* in maize crops were detected in southern England in the 2024 growing season. These transient populations were judged to have been initiated by the natural dispersal of this species from continental Europe rather than via movement in trade. The migration of this pest into the UK has been

occurring for decades and is predicted to continue. There are no feasible measures which can be taken to prevent natural dispersal and the predicted arrival of *H. armigera* adults in summer conditions.

Outbreaks of *H. armigera* have not been reported under protection in GB for at least a decade. When outbreaks have occurred under protection, they have been at specialist growers of ornamentals such as *Pelargonium* and *Chrysanthemum*. Due to the lack of outbreaks and reduced frequency of growers, the risk of future outbreaks occurring is considered to be low.

Therefore, following the findings in the summer of 2024 and continued interceptions in low-risk pathways, the benefits of continuing to regulate *H. armigera* were considered in a review. Stakeholders were asked for their views on the policy review and the proposal to deregulate *H. armigera*. Stakeholder views are summarised below.

Summary of responses to the stakeholder engagement

Four responses were received. Two were supportive of the conclusions of the policy review, one raised no objections, while one was not supportive.

The Fresh Produce Consortium (FPC) provided a supportive response to the stakeholder engagement, after reviewing the interception and outcome data from the Plant Health Portal for 2025. The FPC agreed that the deregulation of *H. armigera* is the most appropriate regulatory step.

A private importer also supported the proposal to deregulate *H. armigera*, based on the evidence that the pest does not pose a threat to GB.

The Horticultural Trade Association (HTA) registered no objection to the proposal to deregulate this pest. They did raise a concern however about the risk to protected ornamental businesses. The HTA suggested a programme of enhanced communication on this pest to at-risk businesses who are likely to import infested cuttings.

*Response: The UK Plant Health Service would be pleased to communicate with ornamental businesses and can discuss with the HTA on the best form this may take. On previous occasions when statutory action has ceased on a specific pest, a factsheet has been developed to provide relevant information to growers; this could be repeated for *H. armigera* including information about the risks associated with propagating material.*

The National Farmers' Union (NFU) were not supportive of the conclusions of the policy review. The NFU cited that *H. armigera* has been intercepted on growing crops showing that it can complete its life cycle in GB. They raised a concern that this pest would be a massive problem if it were to become established here.

Response: The findings of H. armigera in two growing crops of Zea mays (maize) in England in 2024 demonstrate that, during the summer months, populations of H. armigera can develop passing through a low number of generations. However, these populations are judged to have been founded by migrants arriving in late summer from the continent rather than established overwintering populations. These arrivals have been occurring for decades and there are no feasible measures which can be taken to prevent future migrant arrivals. We believe that taking action, by crop destruction, in response to findings of H. armigera is disproportionate to the risk posed by this pest, given the low likelihood of its establishment outdoors over winter.

Next steps

We would like to thank those responding for taking the time to submit views on the policy review for *Helicoverpa armigera*. As the benefits of future regulation have been judged to be very limited, and most responses were supportive or raised no objections to the conclusions of the policy review, statutory action will no longer be taken against findings of *H. armigera*.

We hope this letter demonstrates the reasoning behind our decision and that we have sought to find a solution which reflects the current position and the views expressed from different stakeholders. We will be pleased to continue engaging with you about this pest.

If you have any views about how this review was handled, or its outcome, please let me know.

Yours faithfully,

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