Consultation Response

Friends of the Earth’s response to the Draft National Strategy for the Sustainable Use of Plant Protection Products
Summary
While we welcome the publication of the strategy after the long delay, it is disappointing that it provides so little clarity, appearing to be more of a scoping document than a detailed strategy. The aims are unclear and the objectives too vague and internally-focused to deliver any external change, while the targets and indicators are not prioritised and are often weak and internally-focused.

The strategy is limited by the focus on plant protection products, instead of the full range of pest management options available, and it is of concern that human health issues are largely absent.

Friends of the Earth finds the definition of sustainability within the strategy to be completely unacceptable, as it appears to value economic and industry considerations over public health and the environment.

Friends of the Earth makes the following proposals:

- The strategy must be redrafted to go beyond just covering plant protection products. It must include reduction of all uses, including biocides, in all sectors, including amateur use. Promotion of non-chemical alternatives must be integral, rather than added on. Its overall aim must be a significant (quantified) reduction in use and impacts of pesticides in the UK.

- The regulation, enforcement and monitoring of all pesticides must be brought within a single agency. The remit of the Pesticide Safety Directorate is outdated, and they must be restructured to form the Pest Management Directorate, with a clear remit to give equal coverage to non-chemical pest management techniques.

- The strategy must set out clear plans, including targets, for developing a more appropriate process for biological agents. Comparative risk assessment must be part of the approvals process.

- There must be clear targets for reduction in the use of pesticides, as well as the phasing out/banning of priority pesticides including those which are known to pose a risk to human health, those which cause the most frequent pollution incidents and those which are most damaging to biodiversity.

- The strategy should include a banded tax scheme for remaining pesticides to encourage use of less harmful pesticides, and income from this must be returned to help farmers develop more sustainable practice.

- The strategy should include plans to develop an independent advice and extension service to help farmers adopt more sustainable practice and reduce dependence upon pesticides.

- The strategy should plan to end the industry-led Voluntary Initiative, incorporating activity related measures, e.g. sprayer testing, into legislation

- Much greater resources must be allocated to monitoring human exposure to pesticides from all sources, as well as environmental and wildlife impacts.

- For the strategy to be effective, it must include plans to collect and collate detailed monitoring of usage – such detailed records are now routinely collected by farmers.
With respect to the individual action plans, the rationale of their choice is unclear and does not appear to link very coherently with the objectives and aim of the strategy.

The Water Action Plan must recognise the need to include the complete banning of problematic pesticides, and include clear links to plans for the development of alternatives, comparative risk assessment and reduction of use.

The Action Plan for Biodiversity must address deliberate and illegal use of pesticides to poison wildlife, and incorporate targets to tackle the indirect effects of pesticides on terrestrial biodiversity. The impact of amateur pesticides on biodiversity must be monitored, with provision for targeted action if effects are found.

The Plant Protection Products Availability Action Plan must be renamed and refocused to develop non-chemical pest management options, particularly for minor crops. It must include clear plans, including targets, for developing a more appropriate process for biological agents.

The Amenity sector and Amateur Use Action Plan must include biocides and aim to safeguard human and animal health. It must ensure detailed, publicly available monitoring of usage and exposure; mandatory training and certification; and measures to reduce dependence on pesticides in these sectors, including R & D on alternatives.

Friends of the Earth considers that a Use and Dependence Reduction Plan is crucial to the success of the strategy. It must include a target for overall use reduction, as well as prioritised phase out of problem pesticides.

**General comments**

Friends of the Earth welcomes the publication of the *Draft National Strategy for the Sustainable Use of Plant Protection Products*, after considerable delay.

However, it is disappointing that there is so little clarity within the consultation – which appears far from a draft national strategy, and closer to a scoping document. It lacks any clear targets, timetables or strategic vision, making it difficult to provide a response. It is clear that a more detailed and well ordered strategy must be produced as soon as possible, requiring additional consultation.

While it is absolutely right to respond to public concerns about the environmental and health effects of pesticides, and consumers’ desire for residue-free food, the way in which the key drivers are set out in the strategy (para 1.24) suggests that the only reason environmental impacts or health impacts are drivers is due to public concern. Evidence of the environmental damage of pesticide use should be a key driver for an effective pesticide strategy. Such evidence is well documented, e.g. the decline of farmland birds and arable wild flowers, and pollution of water courses. Indeed it is our understanding that this evidence was the driver behind existing Government commitments to minimise the use and impacts of pesticides.

A further key driver should be the evidence of potential harm to human health from exposure to pesticides. There are many uncertainties about the extent to which ill health may be related to exposure to chemical pesticides but there is enough evidence for action to be taken to reduce human exposure, especially to pesticides with known risks such as anti-
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Cholinesterase compounds, carcinogens or endocrine disrupters. As well as evidence from laboratory tests and recorded effects in nature, there is strong evidence that people exposed to pesticides at work have suffered ill health as a result, with organophosphate sheep dips being the best documented example. Particular sectors of the population are more vulnerable to pesticide related illness with unborn babies being the most susceptible. The Royal Society has recommended that pregnant women should minimise their exposure to endocrine disrupting pesticides for this reason.

The approach of the strategy is hampered and limited in scope by the continuous focus on plant protection products. The document states that better integration of existing measures is required, yet the strategy does not even include chemical pesticides that aren’t covered by Directive 91/414. Many products, particularly in the non-agricultural sector and in amateur use, are not covered by 91/414. This creates a yawning gap in the strategy and undermines any attempt to deal with the whole problem.

In addition, a truly sustainable approach must give full consideration to the range of pest management options available, including non-chemical methods, biological controls, pest and disease warning systems, rotational and habitat management etc. While these are considered in places, they appear as add-ons, rather than central to a coherent approach. Indeed, it is stated that “chemical control will continue to have a prominent and important role in crop protection for the foreseeable future.” This statement seems at odds with a strategy to promote sustainable use, and with the UK Government’s policy of minimising use.

Friends of the Earth considers there is also a need for much better co-ordination with other activities in this area, including legislation, cross compliance, the FSA residue minimisation strategy, industry and retailer best practice. However, Friends of the Earth objects in the strongest possible terms to the suggestion that the industry-led Voluntary Initiative on Pesticides should “play a key role in delivering strategy objectives” (para 2.8), as the recent report of the Environment, Food and Rural Affairs Committee concluded that there is “little irrefutable evidence of the environmental benefits of the VI”.

Finally, it is surprising that lessons from other countries, e.g. effectiveness of economic instruments, have not already been used to inform the strategy. There is a substantial resource of experience from outside the UK on other measures including by the OECD, which notes that those activities found most successful by many countries include:

- measures at registration/re-registration to encourage safer products;
- farmer education and training, including an extension service;
- research and development into alternatives.
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Specific comments
Part 2: Introduction, Aims and Objectives

As a starting point, Friends of the Earth objects most strongly to the definition of sustainable use given in the strategy. This approach to sustainability appears to value economic and industry consideration as of greater importance than the other aspects of sustainability. Para 2.1 defines sustainable use as "minimising the hazards and risks to the environment from the use of plant protection products without compromising necessary crop protection." Human and animal health are not even a consideration, and alternative approaches do not appear to feature. The term 'necessary crop protection' is imprecise and can be interpreted to undermine any real moves towards sustainability. What does 'necessary' mean, and by what criteria is this necessity to be judged? What aspects of the environment will be risked and what hazards will be deemed acceptable to meet this 'necessity'? Friends of the Earth cannot accept a strategy that is based on this definition as it weighs heavily in favour of a narrow economic sector at the expense of consumers, wildlife, the environment and farmers who want to develop different approaches to pest control.

The aim of the strategy is immensely weak, aiming only to 'improve the sustainability of the use of plant protection products', weaker even than the Government's current aim "to limit pesticide use to the minimum necessary for the effective control of pests compatible with the protection of health and the environment". Friends of the Earth considers that the overall aim of the strategy should be a significant (quantified) reduction in use and impacts of pesticides in the UK.

In particular we object to the inclusion of "taking action to safeguard the essential economic interests of pesticide users" as an aim, as it suggests that farmers' economic interests are safeguarded by continued pesticide use. It is important that farmers’ economic interests are taken into account, but this should not be through continued pesticide use and certainly should not be the aim of a use reduction strategy. A much more forward thinking aim would be: "To minimise the use and impacts of chemical pesticides and to ensure safe and effective alternatives are available to UK farmers, growers and other pesticide users"

The objectives listed in the strategy are so vague as to be meaningless and so internally focused as to be capable of being met without achieving any external impact. The short- and medium-term objectives refer only to internal procedures and development of plans, while the long-term objective refers primarily to policy and will be extremely hard to measure.

Effective objectives need to:

- relate to the real world, not just internal policy and practice;
- be aimed at producing clear benefits to the environment, human and animal health protection.
- be measurable and with a timescale for success;

It is worth noting that the European Commission has already indicated the likely purpose of a national strategy in its Communication Towards a Thematic Strategy on the Sustainable Use of Pesticides"v, and its proposals go well beyond the objectives of the current strategy:
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- to minimise the hazards and risks to health and environment from the use of pesticides;
- to improve controls on the use and distribution of pesticides;
- to reduce the levels of harmful active substances including through substituting the most dangerous with safer (including non-chemical) alternatives;
- to encourage the use of low-input or pesticide-free crop farming, in particular by raising users' awareness, by promoting codes of good practices and consideration of the possible application of financial instruments;
- to establish a transparent system for reporting and monitoring the progress made in the achievement of the objectives of the strategy including the development of suitable indicators.

Working within the European context may help to reduce the need for later revision, although the strategy objectives will still need to be much clearer, be measurable and have timescales.

Part 3: Targets and Indicators

The current strategy provides a long list of possible targets and indicators. However, which of these are actually being proposed for inclusion in the strategy is not made clear, so it is difficult to comment meaningfully. When action plans are drawn up, with clear targets attached, there will be need for additional consultation.

However, Friends of the Earth is concerned by the comment that “activity measures” could include “the number of people receiving training” and the “dates by which a plan/publication might be introduced.” “...in line with that being developed for the Voluntary Initiative”. While weak measures are only to be expected of a voluntary, industry-led approach, it is extremely disheartening to then see the same approach taken in a Government document.

To make this clear: such measures provide no evidence of anything other than internal and administrative targets; they provide no guarantee that anything is being done that benefits either the environment or human health; and they will provide little means by which to trace the links between the strategy itself and real world changes because they are self-referential. The EFRA committee concluded the targets set out by the VI are “insufficiently challenging”, and to retain credibility, “setting strong and robust targets- and then meeting those goals” is essential. In any case, it would be inappropriate for a Government strategy to include voluntary measures, without strong incentives to action. In our view, any measures taken from the VI, particularly of this type, would need to be mandatory to be effective.

In terms of additional targets, Friends of the Earth considers that a plan to address indirect impacts on biodiversity is crucial, with relevant targets and changes to regulatory approvals procedures. Recent research has highlighted the serious adverse impacts of pesticides on wider biodiversity through the indirect mechanism of loss of food supplies. In particular, the results of the farm scale evaluations of GM herbicide tolerant crops show clearly that the spectrum and efficacy of herbicides can have serious implications for associated biodiversity. The results indicated that efficient control of broad leaved weed species can lead to reductions in value to wildlife both during the cropping period (reduction of pollen and nectar sources, and associated reduction in insects) and after cropping (reduction in broad leaved weeds leading to reduced weed seed sources for over-wintering birds). In addition,
DEFRA-sponsored research specifically examined the indirect link between pesticides and biodiversity and concluded that another area of concern is summer insecticides.

**Part 4: How the Strategy will bring about change**

**Integration of Existing Measures**

Again, this section does not read like a strategy, but rather as a scoping proposal. As none of the measures are definite, or even prioritised, it is difficult to make meaningful comment. Similarly, the issue action plans lack sufficient detail for comment. Any detailed planning must therefore be made available for additional consultation.

Friends of the Earth considers that a coherent and integrated approach to sustainable pest management cannot be achieved by the Pesticides Safety Directorate in its current format and under its current remit, which is outdated. As a fundamental first step in the strategy, the PSD must be restructured to become a Pest Management Directorate. It would require much wider control than at present, with an Ownership Board including the Environment Agency, English Nature, Food Standards Agency, Health and Safety Executive, farmers and consumers. Regulation and oversight of all aspects of pesticide regulation, monitoring and control would need to be brought into this one agency, including human health aspects, so that these are given greater weight within the evaluations process. The Advisory Committee on Pesticides would be replaced with an Advisory Committee on Pest Management.

To achieve a reduction in hazard and risk associated with pesticide use, comparative risk assessment needs to be a fundamental aspect of the approvals process. In addition, a more appropriate approvals process for biological agents should be developed, taking into account their differences to chemical control, including mode of action, scale, specificity and hazards relevant to biological agents.

In addition, the introduction of a Pesticide tax, targeting the most hazardous pesticides, would help to eliminate their use, with revenues being redirected to research and extension into non-chemical alternatives.

The strategy should develop a co-ordinating role for extension of measures to eliminate dependence on chemical pesticides and develop sustainable agricultural practice. At present farmers receive information from a bewildering number of uncoordinated sources, and so it is not surprising that initiatives are often not adopted. A publicly funded extension service, geared towards the development and adoption of sustainable farming techniques, would provide a coherent and co-ordinated source of independent and up-to-date information to farmers and other commercial users. There is also no reason why its remit could not be extended to cover advice to amateur users, who currently are woefully lacking in information, including on basics such as how to protect their own health and store pesticides safely.

It will be extremely difficult to establish whether targets are being met without adequate monitoring of pesticide use and exposure. Full records of pesticides being used on farms will be invaluable in determining whether the strategy is making any impact on on-the-ground decision-making. Such records are now routinely kept for assurance schemes, and so it would be a matter of collection and collation, meaning minimal additional time or cost requirement on farmers.
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Strategy Action Plans

The rationale behind the choice of action plans appears confusing. Two relate to the environment, one relates to non-agricultural users and the others appear somewhat random. However, considering the lack of clarity from the aims, objectives, targets and measures, this is hardly surprising. The structure, purpose and scope of these action plans need significant revision. Comments on individual action plans proposed are below.

Action Plan for Water

The measures suggested barely go beyond what is being done at present and are unlikely to meet the desired outcome of compliance with the Water Framework Directive, or to shift costs away from the water companies, who currently deal with this issue through water treatment. The strategy must include recognition that control measures will need to go beyond advice to users, updated leaflets or even additional restrictions on users and may need to include the complete banning of problematic pesticides. In addition there need to be clear links to plans for the development of alternatives, comparative risk assessment and reduction of use, as these are far more likely to lead to real reductions in water pollution.

Action Plan for Biodiversity

The Action Plan for Biodiversity must address the need for a reduction in the deliberate and illegal use of pesticides to poison wildlife. Despite the ongoing Campaign for Action against Illegal Poisoning and the Wildlife Incident Investigations Scheme (WIIS) there has not been any significant decrease in wildlife poisoning incidents in recent years\textsuperscript{ix}. This remains a serious conservation problem for a number of birds of prey, such as the hen harrier, as well as a risk to other wildlife and to people. We believe Government needs to be more coordinated in enforcement work against poison abusers.

The action plan needs to incorporate targets to tackle the indirect effects of pesticides on terrestrial biodiversity in line with DEFRA public service commitments on bird populations. This will need to include: research and evaluation of the impacts of the most commonly used pesticides with such effects (including broad spectrum herbicides and summer-applied insecticides); review and restrictions on use including withdrawal of approval if necessary; development and extension of alternatives to these products.

The impact of amateur pesticides on biodiversity must be monitored, with provision for targeted action if effects are found. In some parts of the country, where agriculture is very intensive, important indicator species (e.g. thrush) are effectively limited to garden habitats.

Plant protection products availability action plan

This plan must be renamed and refocused. The issue is not availability of ‘plant protection products’ but availability of pest management options, particularly for minor crops. Gaining and extending approvals for minor crops is not an approach designed to protect the environment and human health. Greatest emphasis must be given to the development and extension of non-chemical alternatives including biological, rotational, mechanical, agronomic and physical measures. As such, this plan would form the centrepiece of the entire strategy. It must include clear plans, including targets, for developing a more appropriate process for biological agents.
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It is disappointing that the Partial Regulatory Impact Assessment (section 14, ‘Risks’ section of ‘Plant Protection Products Availability Action Plan’) states that “there would need to be a re-alignment of the R&D budget to give prevention and control of pests a higher priority, but the time taken from research start, to operational delivery, is long”. This point was raised in 2003 by Friends of the Earth\textsuperscript{viii}, and there has been awareness for years that the 91/414 review of products would lead to a reduction in available pesticides.

Amenity Sector and Amateur Use Action Plan

Friends of the Earth welcomes the suggestion that more attention be paid to the use and impact of amenity and amateur use of pesticidal products, as this is an area that has been wholly neglected to date. However, we are perplexed as to the complete omission of action to safeguard human and animal health in this context, as the majority of the population is urban and therefore more likely to be exposed to pesticides through home and amenity use than by any other route. And by ignoring biocides, the plan will omit very commonly used products. Various schemes already exist in this sector, such as the Green Flag Award. Valuable experience from these schemes can be used to inform the strategy.

The action plan must include biocides. It must also include:

- detailed, and publicly available, monitoring of usage by amenity and amateur users;
- monitoring of bystander exposure including regular monitoring of pesticide residue levels in the general population;
- mandatory training and certification of amenity users, in line with those required for agricultural users;
- clear plans to reduce environmental and human health risks and hazards from amateur pesticide use;
- measures to reduce dependence on pesticides and increase uptake of non-chemical alternatives for both amenity and amateur users;
- research and development plans for alternatives in this sector.

Targeted Use Reduction Action Plan

Friends of the Earth considers that reduction in use of, and dependence on, pesticides is crucial to the success of the strategy. The most effective way of ensuring that use reduction also results in reduction of impacts is to take a hazard based approach to prioritise particular pesticides where there is strongest evidence of harm to the environment, risk to human health, or high clean up costs due to water pollution. If this approach is not taken then the danger is that certain high usage products such as sulphur will be targeted in order to demonstrate an overall reduction in use, but adverse impacts may not be reduced for some time.

However, provided that there is a targeted approach we do consider that aiming for overall reduction will be more likely to result in the substitution of chemical pesticides with non-chemical means of control wherever possible rather than the substitution of one chemical pesticide with another. The plan must include a target for overall use reduction, as well as prioritised phase out of problem pesticides.
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Recommendations

Friends of the Earth makes the following recommendations:

The strategy must be redrafted to go beyond just covering plant protection products. It must include reduction of all uses, including biocides, in all sectors, including amateur use. Promotion of non-chemical alternatives must be integral, rather than added on. Its overall aim must be a significant (quantified) reduction in use and impacts of pesticides in the UK.

The regulation, enforcement and monitoring of all pesticides must be brought within a single agency. The remit of the Pesticide Safety Directorate is outdated, and they must be restructured to form the Pest Management Directorate, with a clear remit to give equal coverage to non-chemical pest management techniques.

The strategy must set out clear plans, including targets, for developing a more appropriate process for biological agents. Comparative risk assessment must be part of the approvals process.

There must be clear targets for reduction in the use of pesticides, as well as the phasing out/banning of priority pesticides including those which are known to pose a risk to human health, those which cause the most frequent pollution incidents and those which are most damaging to biodiversity.

The strategy should include a banded tax scheme for remaining pesticides to encourage use of less harmful pesticides, and income from this must be returned to help farmers develop more sustainable practice.

The strategy should include plans to develop an independent advice and extension service to help farmers adopt more sustainable practice and reduce dependence upon pesticides.

The strategy should plan to end the industry-led Voluntary Initiative, incorporating activity related measures, e.g. sprayer testing, into legislation.

There should be detailed monitoring of pesticide use and exposure, including collection and collation of farm records of pesticide use.

Much greater resources must be allocated to monitoring human exposure to pesticides, from all sources, as well as environmental and wildlife impacts.

References

2 OECD/GD (96) 122 Activities to reduce pesticide risks in OECD and selected FAO countries
3 PSD/HSE, 2002, The Registration Handbook, Pesticides, Biocides, Plant Protection Products, a guide to the policies procedures and data requirements relating to their control within the United Kingdom
iviii Friends of the Earth and Pesticides Action Network (2003) *Breaking the pesticides chain: the alternatives to pesticides coming off the European market*