

# New UK strategy avoids pesticide reduction

The UK government finally published its national pesticide strategy in March of this year. While providing a new policy framework for moving towards sustainable pest management it remains to be seen whether it is the right basis for progress. *Clare Butler Ellis reports.*

The Pesticides Safety Directorate (PSD) published its long-awaited strategy for pesticides in March this year<sup>1</sup>. This followed a public consultation on the draft, to which PAN UK responded with a robust critique<sup>2</sup>.

The title 'Pesticides and the Environment. A strategy for the sustainable use of plant protection products and strategy action plan' gives away two of its main shortcomings. Firstly, it only addresses impacts on the environment and not on human health, despite this being recommended by a number of consultees. PSD have indicated they will reconsider inclusion of human health concerns during a review in 12 months<sup>3</sup>.

Secondly, the concept of 'sustainable use' of pesticides, is arguable. The draft strategy defined this as 'minimising the hazards and risks to the environment from the use of plant protection products without compromising necessary crop protection'. This clearly puts environmental protection behind crop production and ignores social issues, such as public health. This definition has disappeared from the final strategy, but to ensure sustainable food production we need to move towards reducing pesticide use by eliminating the most hazardous chemicals and developing alternative methods of controlling pests. This requires a much broader strategy for sustainable food production, which would incorporate a strategy for sustainable pest management that does not emphasise pesticide dependence.

## Strategy aims

The strategy states that it aims to:

- reduce water pollution caused by pesticides to the standards required by the European Community's water framework directive
- reverse the loss of biodiversity caused by pesticides
- encourage introduction of more alternative chemicals, and greater use of integrated crop management with lower pesticide dependency
- establish best practice in the use of pesticides in the amenity sector
- minimise the risk of environmental damage through inappropriate disposal of amateur products
- maintain the availability of sufficient pesticides or other means of pest control, particularly for minor crops

The means of delivering these is through five

action plans – water, biodiversity, product availability, amenity and amateur use. These are similar to those proposed in the draft strategy, although amenity and amateur use are now, quite rightly, separate and the targeted use reduction plan has disappeared. PAN UK proposed a dependency reduction action plan. The strategy aim to 'encourage the introduction of more alternative chemicals and greater use of integrated crop management with a lower plant protection product dependency' is only a limited step in the right direction but has no matching 'action plan'. It is difficult to see how dependency reduction will be achieved.

## Action plans – nothing really new

Each of the five action plans has an 'implementation group', to steer its progress, and the first round of action plan meetings has already taken place. These groups will report to the Pesticides Forum, but it is not clear whether the Forum will have any active role in influencing their direction. The aim of keeping implementation groups to a manageable size may result in inadequate representation. For example, the agrochemical industry is represented on each group, whereas there is no one representing food retailers or product assurance schemes who have a huge influence on pesticide use, no one representing the public (apart from PAN UK) and no one representing research and development, organic farming or manufacturers of alternatives, where the solutions to chemical-free pest management lie. However, one of the first tasks of the implementation groups is to consider membership, and it will be a test of the strategy's approach to fill these gaps. PAN UK is a member of the water, biodiversity and amateur use action plan implementation groups. Through membership of the Pesticide Forum, we hope to influence the other action plans.

The measures proposed in the action plans vary widely in their ability to deliver strategy aims. Few are new – most are already part of other schemes, such as the voluntary initiative, and a number are likely to be part of the EU Thematic Strategy<sup>4</sup>, due to be published later this year. Too many of them begin with the words 'consider', 'review' or 'maintain' which suggests limited ambitions.

One of the most important issues is the use of indicators and targets for driving and assessing change. This is particularly crucial for the biodiversity action plan, since the effects of pesticides on biodiversity are diffi-

cult to distinguish from the effects of intensive agriculture. Pesticides and intensive agriculture are inextricably linked and reducing pesticide use *per se* will not improve biodiversity unless appropriate habitats and food sources for wildlife are created. Measures of pesticide usage – active ingredient, dose, location, timing – will be crucial in monitoring changes in user behaviour and in linking this with changes in environmental impact.

## Integration of pesticide policies

One of the original aims of the draft strategy was to integrate existing policies and initiatives, including 'co-ordinating action with the Food Standards Agency (FSA) to minimise pesticide residues in food'<sup>5</sup>. However, the FSA's food residues minimisation action plan has now been relegated to a list in an annex and worryingly appears to contain suggestions, such as changing the timing and choice of pesticide, without considering how this could conflict with the action plans for water and biodiversity (PN72 p22).

There is also potential for conflict between the five action plans – for example, those measures in the water and biodiversity plans could be undermined by the product availability action plan. One plan could seek to eliminate a pesticide while another seeks to retain it.

## The way forward

Despite its very obvious shortcomings, the new pesticide strategy provides a framework to work towards more sustainable pest management through better, and lower, use of pesticides. The Pesticide Forum and the implementation groups will have the responsibility for using this framework to make real progress and to deliver real achievements. But there is a range of interests and opinions within the groups and it is vital to build support for better alternatives.

There are also hidden constraints – it was made clear at the first biodiversity implementation group meeting that a pesticide tax was already off the agenda, despite it being listed as a potential measure in the draft strategy. The Treasury sees the issue of tax as theirs alone. Since choices about agricultural inputs are driven primarily by economics, it is difficult to see how much progress can be made in changing people's behaviour without financial carrots or sticks. While there are arguments both for and against a pesticide tax, it would be naive to imagine that sustainable pest management can ever occur without somehow shifting the economics towards environmental protection.

### References

1. *Pesticides and the Environment* [www.pesticides.gov.uk/environment.asp?id=70](http://www.pesticides.gov.uk/environment.asp?id=70)
2. *Pesticide News 70*, p18, 2005.
3. *Letter from Kerry Hutchinson to consultees, 23 March 2006*
4. *Towards a thematic strategy on the sustainable use of pesticides COM (2002) 349*, <http://ec.europa.eu/environment/ppps/home.htm>
5. *FSA consultation*, [www.food.gov.uk/Consultations/ukwideconsults/2006/residueguide2](http://www.food.gov.uk/Consultations/ukwideconsults/2006/residueguide2)