**A step-by-step guide for responding to**

**the UK Government consultation on the draft
National Action Plan for the Sustainable Use of Pesticides**

The UK Government is currently running a [consultation](https://consult.defra.gov.uk/pesticides-future-strategy/sustainable-use-of-pesticides-national-action-plan/) on the draft revised UK National Action Plan for the Sustainable Use of Pesticides (NAP) which sets out how pesticides are allowed to be used for the next five years. It is the best opportunity in a generation to introduce measures which better protect the health of UK citizens and our ecosystems from pesticides.

While many organisations will be taking a stand against agricultural pesticide use, few are highlighting a critical gap in the current draft: reducing the use of pesticides in urban and other non-agricultural settings such as sports pitches, roads and railway tracks (known collectively as ‘amenity pesticide use’). The current draft NAP does not contain any commitments to phase out this unnecessary exposure to pesticides for millions of UK citizens.

Pesticide use in our towns and cities poses a potential threat to the health of both people and wildlife. Over 60 UK councils are already on their way to becoming pesticide-free, proving that it is possible.

Let’s get the UK Government to ban all amenity pesticide use and transform our towns and cities into places in which both people and wildlife can thrive!

**BEFORE YOU BEGIN:**

We have provided suggested answers to the consultation questions below. For each question, we have suggested a general response (text in green) as well as clear recommendations for the Government (text in orange). You can choose to copy and paste the entire answer (both green and orange text) into each box. This should take a total of around 15 minutes. Or, feel free to write your own responses and just include our recommendations (text in orange). We have also suggested that you leave some questions blank. However, do feel free to ignore this suggestion and add your own text.

*NOTE: A quick way to copy and paste using your keyboard is to highlight the text and then press CTRL+C (to copy) and CTRL+V (to paste).*

**START HERE: Open the consultation at -**<https://consult.defra.gov.uk/pesticides-future-strategy/sustainable-use-of-pesticides-national-action-plan/consultation/intro/>

**PRE-CONSULTATION QUESTIONS**

1. Would you like your response to be treated as confidential (in accordance with the Confidentiality and Data Protection statement)?

**No/Yes** *(we suggest you answer ‘no’ to this question but do feel free to answer ‘yes’ if you would prefer)*

1. What is your name?

**Your name**

1. What is your e-mail address?

**Your e-mail address**

1. About yourself

**A member of the public** *(or select whichever category best describes you)*

**QUESTIONS ON GOAL 1 - BETTER REGULATION**

1. In the context of maintaining current high levels of protection for human health and the environment, what can we do to make the regulatory system for pesticides simpler and more efficient?

**COPY/PASTE:**

Recent studies have shown that populations of insects and wildlife more generally are in rapid decline, with pesticides named as one of the key drivers. In addition, an increasing number of court cases in the USA have highlighted the high risk to human health that pesticides pose, particularly in urban spaces. Given this growing body of evidence, **I do not feel that the UK Government has taken sufficient measures to protect us and the environment from these substances, and there is still a way to go before we have ‘high levels of protection’ in this country.** If we are to tackle the use of pesticides and the harms they bring, then the UK Government must have a clearly stated objective to reduce pesticide use in all sectors and move towards chemical-free systems for preventing pests and diseases.

**Given that most amenity pesticide use is purely for cosmetic reasons, I strongly believe that there is almost no justification for using pesticides outside of agriculture.** In fact, there are a growing number of effective, affordable alternatives and over 60 councils and a wide range of other land managers throughout the UK have already take action to end or significantly reduce their pesticide use.

In particular, urban pesticides tend to be used in areas frequented by children such as parks, playgrounds and schools. Given that children are one of the groups most affected by exposure to pesticides, protecting their health should be a priority for inclusion in the NAP. The current draft NAP does not contain any commitments to introduce measures to phase out this unnecessary exposure to pesticides for millions of UK citizens.

As such, **I recommend that the UK Government commits to phasing out all amenity pesticide use, particularly in urban areas (with possible monitored exceptions for targeted applications on invasive species such as Japanese Knotweed or hogweed). As part of this phase out, support should be provided to local councils and other land managers in the amenity sector to help them identify areas that do need to be sprayed and trial non-chemical alternatives.**

A phase out would serve several purposes – reducing exposure to pesticides for those living in urban areas, greater protection and enhancement of urban biodiversity and encouragement for Small and Medium Enterprises (SMEs) that are offering non-chemical, sustainable alternatives to chemical pest and weed control – thus helping to stimulate the green economy.

**I am calling on the Government to;**

* **Commit to phase out, and ultimately ban, the use of pesticides in the amenity sector (including urban pesticides).**
* **Provide support to local councils and other land managers in the amenity sector to help them identify areas that do need to be sprayed with pesticides and trial non-chemical alternatives.**

2. What could we do to increase transparency about the way that evidence is used to inform decisions on the regulation of pesticides?

*We suggest you leave this question blank*

3. How can we best ensure that our regulatory systems keep up with innovation and scientific development including new technologies?

*We suggest you leave this question blank*

4. What actions could we take to expand and improve the current Biopesticides Scheme, to increase the availability of approved biopesticide products and better support potential users?

*We suggest you leave this question blank*

5. What are the priorities for research to better understand the impacts of changes in regulation?

*We suggest you leave this question blank*

6. What other suggestions do you have for improvements to the regulatory system for pesticides?

*We suggest you leave this question blank*

**QUESTIONS ON GOAL 2 – PROMOTING THE UPTAKE OF INTEGRATED PEST MANAGEMENT (IPM)**

7. How can we best develop and support management and advisory services to deliver an increase in the uptake of IPM?

**COPY/PASTE:**

**There are a large number of viable safe and sustainable alternatives to pesticides when it comes to dealing with urban pests and weeds.** In addition, much of current amenity pesticide use is unnecessary and can be eliminated altogether. Verges, public parks, street pavements and tree pits represent an important resource for pollinators and birds. Learning to manage these spaces in nature-friendly ways is crucial for biodiversity to flourish.

There is no ‘like for like’ replacement of pesticides when it comes to dealing with pests and undesired plants in urban settings – rather **I recommend that all local councils and other amenity pesticide users are required to develop and adopt a pesticide reduction an Integrated Pest Management plan which is tailored and adapted to the particular needs of the area.** **To this end, the Government should offer free support, guidance and advice to councils and other land mangers wanting to go pesticide-free. This support should include assistance in developing a pesticide reduction and IPM plan.**

**I am calling on the Government to;**

* **Encourage councils and other land managers to adopt a three-year phase out plan for pesticide use.**
* **Significantly improve the monitoring of and reporting on both amenity pesticide use and the adoption of chemical-free alternatives in the amenity sector.**
* **Provide free support, guidance and advice to councils and other land mangers wanting to go pesticide-free. This support should include assistance in developing a pesticide reduction and Integrated Pest Management plan.**

8. What else could we do to ensure that pesticide users are fully informed about the benefits and practicalities of IPM approaches?

**COPY/PASTE:**

There is no ‘like for like’ replacement for pesticides so going pesticide-free tends to involve the adoption of a range of different approaches. Most councils and other major land managers do not currently have access to the advice, training or information they need in order to reduce their pesticide use or adopt non-chemical alternatives. The UK Government therefore has a key role to play in providing free guidance and other advice and support to the amenity sector detailing how to go pesticide-free.

**I recommend that the Government provides training and advice for council staff, other land managers, and companies/contractors currently offering their services to control weeds with pesticides.**

**I am calling on the Government to;**

* **Create a regularly updated free guide to chemical-free alternatives to herbicides and disseminate to local councils and others in the amenity sector.**
* **Offer training and advice to land managers and contractors to help them understand the benefits and practicalities of practicing IPM in urban settings.**

9. How can the promotion of recognised standards be used to encourage the uptake of IPM, in amenity, agriculture and more widely?

**COPY/PASTE:**

**I don’t believe adding more labels and recognised standards will particularly encourage the uptake of IPM in the amenity sector.** In fact, the significant progress made to date has largely been the result of public pressure from concerned citizens like me driving action by forward-thinking land managers (including councils) and companies. In fact, it would be fair to say that the movement pushing for a pesticide-free amenity sector in the UK has taken off despite inaction from the UK Government. In particular, the Amenity Assured system has been an abject failure and in fact the Amenity Forum itself has done almost nothing to drive any change. **The Government should focus its efforts on assisting councils and other land managers on the practicalities of putting alternative plans in place and monitoring their progress towards phase out targets.**

**I am calling on the Government to;**

* **Move away from industry-led approaches which have been proven to fail and focus instead on providing practical support to councils and other land managers to help them go pesticide-free.**

10. What suggestions do you have for a communications campaign to encourage more uptake of IPM?

**COPY/PASTE:**

A targeted communications campaign is a key tool in ensuring successful uptake of IPM measures in the amenity sector. In addition, a communications campaign to bring the public on board with these changes is also a crucial step. One of the key objections from opponents to the pesticide-free approach is that land managers, and councils in particular, will be overrun by complaints from the public that their area looks ‘messy’ or ‘unkempt’. It has been shown repeatedly that explaining to residents that an area has intentionally been left to ‘go wild’ to help local wildlife and protect human health has eliminated complaints. Residents in pesticide-free areas often come to celebrate the diversity of plant, insect and birdlife that flourishes as a result. Pesticide-free councils are lauded for considering the wellbeing of the environment.

The UK Government therefore has a key role to play in **changing public perceptions of what is considered a ‘weed’.** Many areas currently treated with pesticides can be left to grow and seed with no detrimental impact to the public’s wellbeing or the integrity of local infrastructure. Public opinions of what is ‘neat and tidy’ have been shown to quickly shift when councils and other land managers simply communicate with residents that pesticide use is being reduced.

**I recommend that the Government creates a national communications campaign with posters, signs on ‘wild’ spaces, and localised events to educate councillors and residents on the importance of local urban flora and fauna and to normalise the increased appearance of weeds in public spaces.** This approach was taken in France, with Paris itself going pesticide-free to a widely accepting public.

**I am calling on the Government to;**

* **Create a national communications campaign working with local councils to increase public acceptance of ‘weeds’. Ideally this would focus on the benefits of ending amenity pesticide use and also extend into encouraging amateur users to go pesticide-free in their homes and gardens.**
* **Create a communications campaign aimed at the UK public showing the benefits of their council going pesticide-free and urging them to stop the use of pesticides in their homes, gardens and allotments.**

11. How could we use financial support schemes to offset risks associated with IPM?

**COPY/PASTE:**

During the phase out period, it’s crucial for local councils and other land managers to be able to trial different alternative pest and weed management methods looking for the best fit in terms of both landscapes and budgets. Certain alternatives that would ultimately be the best fit can have restrictively high upfront costs, such as the highly effective Foamstream machine. **I recommend the Government offer seed funding for councils to trial alternatives, educate local residents through a communications campaign, and find the best long-term solution to deal with their weeds and pests.**

**I also recommend that the Government offer dedicated funding for contractors to retrain in adopting alternative weeding methods** to ensure there is no loss of employment and consolidate the business’ future in an increasingly green society.

**I am calling on the Government to;**

* **Offer seed funding for councils to trial and adopt their new IPM plan, including a communications campaign.**
* **Offer financial support for chemical pest-management contractors to retrain in chemical-free alternatives.**

12. What should government do to facilitate research on the availability of effective methods of pest control?

**COPY/PASTE:**

While there are a number of extremely effective non-chemical weed control methods already being deployed in the amenity sector, it remains a relatively new area of innovation in the UK. As a result, the companies developing these new technologies undertake a high level of risk which puts other companies off from joining the sector, and ultimately keeps costs relatively high for councils and other land managers. **I believe the UK Government should partner with and support companies and academic institutions already involved in non-chemical weed control to conduct further research and development aimed at making alternatives to amenity pesticide use more effective and affordable to adopt.**

**I am calling on the Government to;**

* **Partner with and support companies and academic institutions already involved in non-chemical weed control to conduct further research and development.**

13. What other suggestions would you make to improve uptake of IPM approaches?

*We suggest you leave this question blank*

**QUESTIONS ON GOAL 3 - SAFE AND RESPONSIBLE USE**

14. How should we raise awareness of the health, environmental and legal risks of using professional products without having the correct training and certification?

**COPY/PASTE:**

Almost all amenity pesticide use is unnecessary which is why I am calling for a UK-wide phase out and ban. However, on the **rare occasions when pesticides are still used (for example, to deal with invasive species) I advise that stronger enforcement measures are put in place in order to both identify and punish non-compliance.**

Currently there is little effective enforcement for non-compliance around pesticide use, regardless of whether that non-compliance involves using professional pesticides without a certificate, or using pesticides illegally or in breach of regulations. Too many of the requirements around pesticides are based on best practice guidelines which are neither mandatory nor enforceable. I think there needs to be more regulation surrounding the use of pesticides in the amenity sector and the ability to enforce such legislation and penalise those that do not adhere to it. Unless enforcement is strengthened there will be no real deterrent against misuse.

**There is also currently no adequate system in place which enables the public to report pesticide-related incidents. Again, I feel this removes a key deterrent preventing misuse.**

**I am calling on the Government to;**

* **Commit to phase out, and ultimately ban, the use of pesticides in the amenity sector (including urban pesticides).**
* **Put in place stronger enforcement measures to both identify and punish non-compliance by amenity pesticide users.**
* **Develop an adequate reporting system for the public to report pesticide-related incidents, including non-compliance by pesticide users.**

15. What would be the benefits and challenges of introducing a legal requirement for certification of pesticide advisors?

 *We suggest you leave this question blank*

16. What more should retailers be doing to inform amateur pesticide users about the actions they can take to control pests more sustainably?

**COPY/PASTE:**

**I am calling for a phase out, and ultimate ban, of the use of pesticides by non-professionals in their homes and gardens.** There is no justification for continued pesticide use by non-licensed amateurs and a phase out is both possible and necessary to reduce the overall use of pesticides in the UK.

In the meantime, I believe there are a number of measures that retailers can and should take to help better inform the general public about both the dangers of pesticides and alternatives to pesticides for home and garden use. For example, every retailer that sells pesticide products should have a member of staff trained in pesticide issues and non-chemical alternatives who is available to answer questions from the public. There should also be clear warning signs about the harmful effects of synthetic pesticides, both where pesticides are displayed and offered for sale and at checkouts. Information on alternatives to synthetic pesticides should equally be clearly displayed in all areas where pesticides are offered for sale. Ultimately,it feels obvious to me that only retailers that focus specifically on gardening or DIY should be permitted to sell pesticide products. The sale of pesticides in shops that sell food, clothing and other unrelated products should be banned.

**I am calling on the Government to;**

* **Phase out and ultimately ban the sale of pesticides to unlicensed amateurs to use in their homes and gardens.**

17. How can we best target inspection and enforcement to prevent unsafe and environmentally damaging pest management practices?

**COPY/PASTE:**

**At present the reporting system for pesticide incidents is highly inadequate. It is difficult to access for members of the general public like me**, is extremely weak in its ability to follow up if a complaint has been made, and lacking in capacity to monitor, investigate or remedy pesticide-related incidents. The Chemicals Regulation Division (part of the Health and Safety Executive) is not set up to effectively investigate and remedy pesticide-related incident. This has resulted in a major accountability gap within the UK pesticide regime. **I strongly feel there needs to be a dedicated enforcement unit, separate from the CRD, which can monitor complaints and undertake investigation, enforcement and remedy actions.**

**I am calling on the Government to;**

* **Create an incident reporting system that is easy to access and clearly understandable by the public.**
* **Establish a separate unit focussed solely on dealing with pesticide incidents that has the power and capacity to investigate and enforce legislation.**

18. What kinds of challenges need to be addressed in order to ensure safe disposal of unused pesticides and pesticide containers?

*We suggest you leave this question blank*

19. How can we best make sure that members of the public know what to do when pesticide products are withdrawn from sale?

**COPY/PASTE:**

In an ideal world the public would not have access to pesticide products that could cause problems for human health or the environment.

**Every council in the UK must be legally required to provide a facility for the safe disposal of home and garden pesticides for the general public.** Retailers should also offerthe public the option to return unused pesticides and empty containers to the shop where they purchased the product.

**I am calling on the Government to;**

* **Make it mandatory on councils to provide safe disposal sites for pesticides and for these to be clearly advertised and accessible to all.**
* **Introduce an amnesty for six months after any ban on a particular active substance during which the public can dispose of unused pesticide products that are no longer approved.**
* **Make it mandatory for retailers selling pesticide products to display information on products that have been withdrawn from use and how the public can safely dispose of them.**
* **Encourage retails to introduce a system whereby the public can return both empty containers and unused pesticide products to the shop where they purchased them.**

20. What further actions are needed to ensure that equipment used for application of pesticides complies with safety requirements?

*We suggest you leave this question blank*

21. What else should we do to ensure that pesticides are used safely and responsibly?

**COPY/PASTE:**

**The notion that pesticides can be used entirely safely is false – they are poisons and their job is to kill living organisms so, by their very nature, they pose a risk to the health of both humans and wildlife.** With that in mind, if the UK Government wants to reverse biodiversity losses, protect soil and water and create a safer environment for all that live in the UK, then it must eliminate all unnecessary pesticide use. I believe **reducing and ending the use of amenity pesticides, which play no role in food security and are largely used for cosmetic reasons, should therefore be adopted as an immediate goal of the UK Government.**

While amenity pesticides are being phased out, new **safety measures should be introduced including the introduction of mandatory prior notification for the public and access to spray records**. We have a right to know which pesticides are being sprayed and when, but this information is not currently available in the UK. **The NAP should introduce a requirement for all professional users of pesticides to notify surrounding residents before spraying. In addition, signage in parks and green spaces should inform members of the public when spraying will take place so we can choose to avoid the area, especially if we’re accompanied by young children or pets who are particularly vulnerable.**

**In addition, the public should have access to spray records upon request.** If someone suspects that they have been exposed to pesticides it is vital that they know which specific pesticides have been used. Adoption of such a basic measure could aid in the swift diagnosis of a health problem following a pesticide exposure incident. The current draft NAP says nothing about prior notification nor access to spray records.

**I am calling on the government to;**

* **Commit to phase out, and ultimately ban, the use of pesticides in the amenity sector (including urban pesticides).**
* **Introduce mandatory prior notification for the public, signage for parks and green spaces detailing spray schedules and public access to spray records.**

**QUESTIONS ON GOAL 4 – TARGETS, METRICS AND INDICATORS**

22. What are the priorities for data collection and research on pesticide usage?

**COPY/PASTE:**

There is not enough transparency on how much councils spray our towns and cities, and this information should be readily available on council websites until they are phased out. **The Government should mandate that councils publish this data publicly, and encourage them to monitor the numbers of pollinators and other environmental outcomes in key areas in order to compare with sites that are no longer sprayed.** I think that understanding the direct positive effects on wildlife of no longer spraying public spaces will increase public support and encourage further councils to adopt IPM and ultimately end their pesticide use.

**I am calling on the Government to;**

* **Mandate that councils make their spraying records publicly accessible.**
* **Encourage councils to select an area in which to monitor the number of pollinators, and other environmental outcomes such as water pollution levels, while they are phasing out pesticides.**

23. What are the priorities for research on the environmental impact of pesticides?

**COPY/PASTE:**

**There is an urgent need for better monitoring of amenity pesticide use and how this impacts on our urban environments, particularly urban biodiversity and water quality.** Hard surface application of pesticides can be particularly problematic in terms of runoff to water courses resulting in the contamination of aquatic environments and subsequent entry of pesticides into drinking water sources. Little is also known about the impact on urban flora and fauna from the use of amenity pesticides so I strongly feel that this research gap needs to be filled.

**I am calling on the Government to;**

* **Introduce more effective monitoring of amenity pesticide use and how this impacts on the environment, particularly urban biodiversity and water quality.**

24. What are the priorities for research on the health impacts of pesticides?

**COPY/PASTE:**

**There is an urgent need to conduct research on a number of topics which are major gaps in our understanding of how pesticides impact health.** In terms of amenity pesticide use (and in no particular order) they are: the chronic effects of pesticide exposure on the general public, the impacts of occupational exposure for spray operators, and the impact of direct exposure on vulnerable groups such as children, pregnant people and the elderly.

**In addition to significantly expanding pesticide research, we also need an improved health monitoring system which would provide invaluable insights into how pesticides are affecting UK citizens.** I do not believe the current monitoring system for pesticides is fit-for-purpose. Acute poisoning incidents are dealt with inadequately and there is no attention paid to chronic impacts. If we are to gain a thorough understanding of the human health impacts of pesticides it feels essential that there is an **effective reporting and monitoring system in place which not only captures acute poisoning incidents but also tracks long-term (chronic) health impacts of pesticide exposure.**

In addition, I see that there is still one very clear problem that needs to be addressed. **Namely, the lack of involvement of the Department of Health (DoH).** Despite years of effort by organisations to engage the DoH in pesticide issues, it continues to assert that it is not part of their remit. If we are to effectively tackle health harms caused by pesticides then we need a clear acknowledgement from the DoH that pesticides are not only an environmental issue but are equally an issue of great importance for human health. We then need the DoH’s focus to expand accordingly to include a work on pesticides.

**I am calling on the Government to;**

* **Support and/or conduct research on both the chronic and acute health impacts of amenity pesticide use on the general public, spray operators, and vulnerable groups including children.**
* **Develop a human health monitoring system to gather evidence on both the acute and chronic health impacts of amenity pesticide use.**
* **Ensure that the Department of Health expands its focus to include work on health and pesticides.**

25. What suggestions do you have for ways of measuring our progress against the goals set out in this NAP?

**COPY/PASTE:**

**I recommend that the Government makes it mandatory for councils to report annually on their pesticide usage and the progress they’ve made on pesticide reduction. It should also centrally monitor amenity pesticide use and report annually on the active substances and volumes being used in the sector. Finally, the Government should monitor and report on the environmental impacts of phasing out urban pesticide use against its goals set out in the 25 Year Environment Plan.** Through regular updates and increased transparency of the progress being made towards a total phase out, change is possible.

**I am calling on the Government to;**

* **Oblige councils to report annually on progress made on pesticide reduction.**
* **Monitor the environmental impacts of phasing out urban pesticides and report annually.**

**CONCLUDING POINTS**

26. How can we best bring together stakeholders with diverse interests to support delivery of the NAP, working towards a common goal of sustainable pest management?

**COPY/PASTE:**

**I believe that phasing out amenity pesticides is an achievable goal that would transform the UK’s urban landscapes and road verges into thriving spaces for nature.** Over 60 councils across the UK are already showing that this shift is both possible and popular with UK citizens. If the Government puts in place the recommended measures outlined in previous questions, a complete phase out of urban pesticides can be achieved. The UK Government should also work closely with the public, non-governmental organisations, councils and other land managers to understand their needs and support them to develop and adopt chemical-free solutions tailored to their local pest and weed management needs**.**

**I am calling on the Government to;**

* **Bring together local stakeholders, including local councils and other land managers, in order to develop and adopt plans for phasing out amenity pesticide use.**

27. Considering the NAP as a whole, what other comments and suggestions would you like to make in addition to those covered by previous questions?

*You can either leave this question blank or do feel free to add any additional comments you would like to make.*

**You can now submit your answer.**

**Thank you for taking the time to complete this consultation!**