

17th August 2012

Dear David Williams,

Re: Consultation on the draft UK National Action Plan for pesticides

Thank you for giving the Association of Applied Biologists the opportunity to respond to this consultation. We see the National Action Plan for pesticides as a crucial issue because the losses to crops caused by pests, weeds and diseases need to be tackled in a responsible manner.

Trade-offs exist between reducing externalities associated with pesticide use and ensuring a secure supply of affordable and nutritious food. Counterintuitive effects can occur and the EU legislators may not be aware of some of the nuances. In particular, the 'Borlaug effect'¹ whereby resource use efficiency is improved by reducing crop losses can mean that there are environmental benefits from pesticide use in terms of saving land, water, fertiliser and energy resources. Furthermore, reducing the availability of certain pesticides before alternative crop protection methods have been found inevitably means an increase in the use of the remaining pesticides. This would cause increased and intense selection pressure for pests, diseases and weeds to evolve resistance. Loss of control to resistance would make EU agriculture increasingly vulnerable to yield losses.

Your plan document is lucid, concise and provides a useful overview. However, the following items merit consideration:

- Section 4.2: Should this not also include objectives relating to food security? Namely, "Fair prices, choice, access to food and food security through promotion of open and competitive markets" (Food Matters report, 2008²).
- Section 7.1: Is the frequency of detection of pesticides in water partly related to the sensitivity of detection equipment?
- Section 7.1: Most of current crop protection is based on the use of pesticides and so the statement, "virtually all users adopt some elements of an integrated approach" may be more accurately stated as "the majority of users only adopt minimal elements of an integrated approach."
- Section 7.1: Given the need to develop a greater range of viable techniques, what mechanisms will be put in place to ensure novel pest management options become available? This requires research, development and knowledge transfer.
- Section 7.1: As well as needing to develop a greater range of viable techniques there is also a need to ensure a greater range of viable products is made available to users. Some regulatory hurdles need to be overcome to achieve this.
- Section 8.1: Accidents will happen so more use can mean more risk

- Section 9.4: Is there a need for further training of amenity users given what is said in 7.1? Training in alternatives to pesticides should be mentioned specifically here.
- Section 11: Could do with an R&D heading.
- Section 14.2: Please clarify the risk presented by these particular compounds.
- Section 17.1: IPM is knowledge intensive and additional provision is needed to inform growers and agronomists about it.
- Section 17.8: This point is of major concern. You state that there is a “significant” programme of work to reduce reliance on chemical pesticides. What is meant by this and is it sufficient to meet the demand? It is the experience of many of our members that Defra has been substantially reducing R&D in this area since 2005. It is unfortunate that the mismanagement of the introduction of the Single Payment Scheme appears to have had a knock on effect of reducing the Defra science research budget. The current budget allocated to R&D on alternatives to pesticides is approximately £500K annually.

One of our members stated, *“This document³ from CRD, which many of you probably have seen, shows the decline in the CRD R&D budget (p 7). They currently spend 500k on alternatives to chemical pesticides, which is tiny when you consider the size of the problem. Defra also used to fund significant work on IPM through its Farming and Food group based at Nobel House, but that has now dried up due to cut backs. This is of major concern because we are losing the research capability (at least in England and Wales) to do useful work on IPM at universities and institutes. To me the national plan document is removed from the food security context, and as such would appear to be out of touch with the seriousness of the problems facing UK and European agriculture.”*

- Section 18.3: Please consider if the Pesticide Usage Survey should also include data on alternative approaches to crop protection because these do not appear to be collected with the same rigour.

The AAB has produced a policy briefing document on sustainable crop protection in Europe⁴. Placed in the context of increasing global demand for food and current concern about food security there are serious consequences of leaving EU agriculture vulnerable to pests, diseases and weeds. If the productivity of EU agriculture declined and yields became more unstable because of insufficient crop protection there would be a number of undesirable consequences. These include rising food prices, impacts on human health as foods such as fruit and vegetables become more expensive, food production companies being driven out of Europe to countries where costs are less, more land being used for agriculture to compensate for lower productivity and increasing greenhouse gas emissions as agriculture becomes less efficient.

In some ways the EU has put the cart before the horse by introducing anti-pesticide legislation before alternatives are made available. There is an urgent need for R&D of novel crop protection methods especially as pests, weeds and diseases evolve resistance to existing permitted plant protection products.

Yours sincerely,

Prof Toby Bruce

On behalf of the Association of Applied Biologists

¹ Balmford, Green & Phalan (2012) What conservationists need to know about farming. Proc. Royal Soc. B
<http://rspb.royalsocietypublishing.org/content/early/2012/04/24/rspb.2012.0515.full.pdf>

² Cabinet Office "Food Matters" report July 2008
http://webarchive.nationalarchives.gov.uk/+http://www.cabinetoffice.gov.uk/media/cabinetoffice/strategy/assets/food/food_matters_es.pdf

³ CRD Pesticides research and development requirements (2012)
<http://www.pesticides.gov.uk/Resources/CRD/Migrated-Resources/Documents/R/RD-requirements-Defraweb.pdf>

⁴ AAB Policy briefing: towards sustainable crop protection in Europe (2011)
<http://www.aab.org.uk/images/biological%20control%20group%20briefing%20feb%202011.pdf>