

An independent view of the Pesticide Forum Annual Report 2012

Introduction

As members of the Pesticide Forum, the Pesticide Action Network UK (PAN UK), Friends of the Earth, and Sustain: the alliance for better food and farming (Sustain) disagree with a number of the conclusions in the Annual Report published on 20th June 2013 by the Pesticide Forum. We have produced this short document to explain why this is the case.

Our aim is not to undermine the Forum's work but we think it is important that viewpoints, including ours, which are not reflected in the report are published alongside it. We understand that the many stakeholders in the Forum have many different views on key issues and, by publishing this document, we are making our views clear.

In particular we take issue with the overall tone of the report, because it indicates that pesticide use in the UK is well regulated and that there are no real concerns about the effects that pesticides are having on people and the environment in the UK. We think this is not correct. We also have serious concerns about specific points, not least the way that the implementation of the new EU Directive on the Sustainable use of Pesticides (SUD) has been reported (detailed below).

Although the Pesticide Forum can and does serve a useful purpose, in recent years it has too often defended the existing uses of pesticides and paid inadequate attention to ways of reducing the use of pesticides in the UK. It is not the role of the Pesticide Forum to "reassure" the general public that the use of pesticides in the UK is carried out safely. Instead it should focus on presenting important statistics, leaving readers to draw their own conclusions.

Response to the Chairman's Foreword

We agree with the Chairman's Foreword in that we are very disappointed by the weak government measures for implementing the new SUD. However, we do not agree the UK currently has "very high standards of protection for human health and the environment". The failure of the government to effectively implement the SUD will mean that there will continue to be risks to people and the environment from using pesticides in the UK.

The Chair goes on to state that Integrated Pest Management (IPM) is an area that has been identified by Forum members as a key priority. We agree with this, but do not agree with the assertion that IPM is widely adopted throughout the UK. Whilst farmers and growers might always have had an "awareness and understanding of what integrated approaches mean" this does not mean that IPM techniques are fully implemented. Indeed reports (see below) have shown that farmers often use only one or two IPM techniques and not the full range that could dramatically reduce the amount of pesticides used.

While we are pleased to see a case study from the Soil Association in the report, the Forum is still a long way from integrating such non-chemical and low input methods of production into its work as a way of reducing pesticide use.

Response to the Executive Summary

We dispute the assertion that the evidence presented in the report indicates that pesticides in the UK are being stored and used responsibly. The reports that PAN UK receives from members of the public about pesticide exposure, bad practise in amenity spraying in parks and other areas tells another story.

Similarly, the use of neonicotinoid seed treatments is widespread in the UK and Defra remains opposed to any European measures to protect bees and other pollinators from these toxic chemicals.

The summary goes on to state that reports of adverse effects on human health and the environment are rare. However, we know from experience that it is very difficult for people to report any adverse effects correctly and, even when these are reported, in many instances they are not taken seriously. It is clear to us that the current reporting system leads, systematically, to underreporting of adverse effects from using pesticides.

The description of the UK National Action Plan (NAP) as a sophisticated and effective control regime is, at best, disingenuous. In our view the NAP missed vital opportunities to change how and where pesticides are used. It does not, for example, require residents to be notified prior to spraying, protect people from pesticides in public areas such as parks, hospitals and school, or develop a system of Integrated Pest Management (IPM) for the UK.

The rest of the report

Part seven of the report looks at regulatory measures and states that; “Where appropriate, risk management measures are imposed so as to mitigate any risk. For example, re-entry levels are set for workers going into treated crops, and there is a specific risk assessment for pesticides used in public places.” We dispute that risk management measures are adequate or appropriate in all situations, particularly for bystanders and residents.

Part nine of the report on IPM states that; “Many users, particularly in the agricultural and horticultural sectors, adopt practices which are in line with the general principles of IPM as set out in Annex III of the Directive and reflect industry commitments to ensure pesticides are only used when necessary, for efficacy reasons and due to the requirements of farm assurance schemes, retailer requirements or other national or international production standards.” Our view is that the UK is lagging behind the rest of the EU on IPM and is not in line with the spirit or letter of SUD requirements.

Although many farmers will probably be using some IPM techniques, most farmers are not going nearly far enough to implement the changes envisaged in the SUD. The 2009 RELU study by the University of Kent, research by Imperial College and work by others on IPM in UK arable systems has highlighted that most farmers are adopting only a limited number of IPM techniques and are not gaining the benefits of a fully integrated approach.

In contrast, the German NAP views IPM adoption as a standard ‘bell curve’ distribution and agreed that their efforts need to focus on shifting the majority of German farmers (especially the bottom 25%) towards the top 25% of best practices. This is the kind of approach that we would like to see taken up in the UK.

Conclusions and recommendations

The tone of the annual report indicates that the Pesticide Forum secretariat is satisfied that enough is being done in the UK to reduce risk to people and the environment from the use, misuse and overuse of pesticides. We disagree.

We recommend that the Pesticide Forum focuses in future on non-chemical weed and pest control techniques for agriculture and amenity use. We also recommend that future annual reports focus on presenting valuable statistics, leaving readers to interpret these. We do not believe there is any room for complacency in tackling the considerable risks pesticides continue to pose to our health and environment.