

28 November 2002

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Dear Ms Hellsten



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RESPONSE TO CONSULTATION ON DOCUMENT: TOWARDS A THEMATIC STRATEGY ON THE SUSTAINABLE USE OF PESTICIDES

ADAS would like to comment on the above consultation. I am writing these comments on behalf of a number of colleagues. I hope they are all clear but if not please do not hesitate to come back to me for clarification.

We support the need to continue to reduce the hazards and risks to the environment associated with the use of Plant Protection Products (PPP)s. However, we recognise the benefit that PPPs can offer in terms of profitable food production, maintaining quality and in reducing the other environmental impacts by, for example, improving nitrogen use efficiency. Balancing both aspects require detailed information on which to make assessments. There will be important lessons to be learnt from the current ICM survey being undertaken by ADAS on behalf of UK DEFRA and Crop Protection Agency on how far the use of low input and integrated production methods have been adopted by growers and, in particular, the barriers to a greater uptake of such methods. A key component to this will be the attitude to risk and in particular the financial implications associated with any such decisions.

We are not best placed to comment on the benefits and costs of the measures to the pesticides industry. However, it is relevant to consider the costs to the producer. At present, the economic climate in all cropping sectors is very depressed and, therefore, it is vital that any measures do not feed through into higher costs for producers.

The following comments relate to the EC document dated 1 July 2002 (com (2002) 349 final).

Paragraph 1.3.1

We agree that the amount of active substance applied on the same crop in the same region during the same growing season can vary considerably. Furthermore, on the basis of limited evidence, it is also apparent that the amount of PPP used is not always strongly correlated with the particular need. However, analysis of such data is not easily undertaken because there are no data that relate use to need. The UK Pesticides Forum Outcomes and Indicators sub-group report has identified that an indicator for relating use to need, is required to improve understanding of the responsible use of PPPs. To improve the targeting of PPP use, development of such an indicator and its regular updating must be progressed.

Paragraph 1.3.2

This paragraph refers to the use of conservation tillage and its potential advantages and correctly identifies that such techniques largely depend on the use of herbicides. It should also be noted that the worst cases of herbicide resistance are associated with minimum tillage techniques and this ultimately leads to greater PPP use. This highlights the vital need to balance PPP policy objectives with wider environmental objectives.

Paragraph 2.1.2

Any development of MRLs to consider potential cumulative effects should be based on the impact of the residue levels and not the ability to detect very low quantities.

Paragraph 2.2.1

The reform and mid-term review of the CAP is a major opportunity to integrate PPP, environmental and other policy objectives. The potential decoupling of set-aside as a supply management tool presents the opportunity to use set-aside for much more environmental gain. By allowing five metre wide set-aside/buffer strips around fields, this presents a valuable opportunity to protect both watercourses and other vulnerable environmental features surrounding fields. This would enable the current LERAPs to be implemented and it would also be readily observable that it was/was not being complied with. It is also worth noting that although arable payments have been decoupled from yield most PPP inputs are not very sensitive to price but relate much more to the ability to accurately predict and assess the risk of not applying the product. It is risk assessment and improved decision making against that risk that would be key components in any strategy to improve overall PPP use.

Paragraph 2.5

The UK Pesticides Forum Outcome and Indicators Report is a valuable document to be read in association with this section. We also support the contention that frequency of application provides a valuable indicator of PPP impacts and is something that could already be reported more easily as part of the PPP usage surveys.

It is also vital that there is good co-ordination of all monitoring activity, including strategy and interpretation, through all Member States so that it is possible to interpret and understand the effectiveness of policy in relevant countries.

Section VI, 1

The italics at the end of paragraph a refer to ‘The plans should be closely co-ordinated or’. This should read ‘The plans must be closely co-ordinated or ...’ so that costs to the industry are minimised but also to enable uptake and adoption. If different actions have different requirements, this leads to confusion and subsequently lower uptake and adoption. So, for instance, the suggestions in paragraph b.1 could and should be integrated with changes to CAP. As explained in paragraph 2.2.1 above, if five metre set-aside was allowed alongside watercourses and other beneficial features, then the costs to the industry would be significantly reduced. Cost to the taxpayer could also be minimised by reducing the need to introduce other measures that may need funding. It is, however, vital in such measures to ensure that a balance is struck between the PPP impacts and other environmental impacts. For instance, there may be conflicts between reducing herbicide use and cultivations increasing potential nutrient leaching or

biodiversity. A good UK example is the management of set-aside with herbicide that results in less damage to nesting bird species than by cutting or cultivation to control weeds.

Section VI, 1 d

We support the principle that greater knowledge through research can help reduce the impact of PPPs and improve targeting of use. To progress IPM and ICM, it is vital that we are able to more accurately predict risks and benefits of treatment options. In particular, it is necessary to make an accurate and robust prediction of when not to spray. The development of decision support systems can play a vital role in achieving this, but it is vital to include consultation with practical users into such projects.

Better decisions could be made in the field if data on impacts of PPP use were more readily available. The production of Environmental Information Sheets as part of the UK Voluntary Initiative is a major advance in this respect. However, it would be quite feasible to make more information available as part of the approvals process on non-target plants and invertebrates.

Users of PPPs would be in a better position to make correct decisions if there were a common format for data and labels. This would be even better were it available in electronic form so that ready selection of the optimum product for the use and risk situation could be made.

Within the need for information on potential synergistic and antagonistic effects of PPPs, adjuvants should be considered. Adjuvants are one route often suggested to reduce PPP use. It is vitally important, if such a route is adopted, that the use of adjuvants and their associated impacts on the environment are considered as part of the approvals process. The need for this work and its implications are very similar to the implications of multiple applications. When a product is approved, considerable work has been undertaken to develop and understand the formulation. If this is then changed in use by the addition of a different adjuvant, it is important that the implications for efficacy on non-target species and on uptake by the plant (and potential to change residue levels) are understood.

Significant opportunities exist to reduce the impact of PPPs by improved engineering, namely to reduce exposure of operators and bystanders, to reduce spillages at filling, to improve the delivery of PPPs to the target and to reduce sprayer washings and the need for disposal. Research in this area could lead to significant environmental improvements by reducing the impact of PPPs.

A priority for research should be addressing point source contamination and non-approved use. Studies have shown that up to 80% of water detects can come from point source contamination. The 'biobed' can be an effective method of reducing concentrations, potentially giving 100,000 times reductions. 'Biobeds' are still not approved by many Member States due to uncertainty on disposal of spent material and acceptability of leachate.

Many of the research components identified need significant Member State level participation. However, others such as MRLs and safeguarding health could be co-ordinated at an EU level, with due regard to national diet composition.

Any decisions on substitution must not be made in isolation. It is necessary to avoid replacement of one product by another, such as happened when atrazine use was replaced by diuron. Any

proposed changes in use restrictions must be fully evaluated and this assessment must include a prediction and measures necessary to replace one problem with another.

Section VI, 2

Much of the detail given here is already ongoing in the UK, recently with added momentum as part of the Voluntary Initiative. Paragraph f includes details of education and training. It is vital that as part of that, there is a mechanism also for periodic updating of those actively involved in recommending, supplying and using PPPs.

Section VI, 4

As indicated above, a significant incentive to reduce PPP use would result from an ability to make better decisions. Many PPP applications are price insensitive – with the cost often being small compared to the risk of not applying and suffering yield and quality reductions. Rather than a more general restriction on PPP use, it would be more appropriate to target specific situations where there is a known impact from PPP use. A more general approach is less likely to yield results and would be more difficult to measure. However, as an example, measures to reduce contamination of surface water, through education and improved engineering/design or changes to product packaging would prove more cost-effective and successful. Such targeted measures must however, be integrated with other programmes to avoid conflicts.

It is essential that any financial instruments do not distort the market. Special levies on PPPs would significantly increase the costs of production. We note the results from Denmark and Sweden where impact was ‘less than expected’ but note that we would have predicted such a reduced change in impact relative to the increased costs of such levies. If such measures are to have any significant effect it is vital that monies raised are put directly to supporting measures to reduce use and impact of PPPs. We are pleased to note that the EC does not propose at this time to introduce an EU wide scheme of levies.

Section VI, 5

Development of suitable indicators is vital to measure response. We again refer to the UK Pesticides Forum Outcomes and Indicators sub-group report on indicators. Many of these would be essential for such purposes as outlined here. That report also identifies indicators that need to be developed to better interpret changes in impacts and practice. We, as does that report, recognise that indicators based on current data collection are more cost-effective to collect. However, better indicators could be developed in many areas and these should be more targeted to specific areas. A vital aspect of indicators is their interpretation and integration. Single and non-interpreted ones are of reduced value.

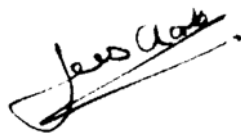
It is quite possible that many of these implications can be derived at an EU level. If this can be made to work evenly across the member states, then the implications for the competitiveness of producers should be the same in all countries. However, if higher standards are adopted in one country this clearly creates barriers. It is important, if greater harmonisation takes place across the EU, which the relevant geographic and climatological areas across which extrapolation can be made is agreed.

We support the need for Member State implementation of many of the aspects. It is, however, relevant to consider that some could be implemented at EU level – such as improvements in engineering, issues of operator and bystander exposure.

In summary, the paper includes many appropriate measures to minimise PPP impacts. Clearly, further work is required to implement many of these. It is vital that the development of measures is integrated with other policies and ongoing actions, such as the UK Voluntary Initiative. Much can also be learned from previous work and ongoing work, such as the UK Pesticides Forum. In all cases, it is essential to be mindful of the cost implications which could be very great on producers, especially if a range of policies are not integrated in their implementation. Much of the reduction in impact and use can be derived from improved targeting of use and we believe this aspect is not well recognised in the current proposals.

I hope these comments are helpful. Please contact me if you need further clarification.

Yours sincerely

A handwritten signature in black ink that reads "James Clarke". The signature is written in a cursive style and is underlined with a single horizontal line.

JAMES CLARKE
Head of Crops and Sustainable Farming Systems