

BCPC (BRITISH CROP PROTECTION COUNCIL)

Comments on the Commission Communication: Towards a Thematic Strategy on the Sustainable Use of Pesticides.

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1. Introduction

BCPC is a registered charity that exists to promote the development, use and understanding of effective and sustainable crop protection practice through the provision of an independent inter-professional forum (see Appendix 1).

BCPC is a uniquely broadly based organisation that endeavours to provide independent, balanced and authoritative views on the issues raised by the science and practice of crop protection. This structure offers opportunities for the expression of a very wide spectrum of information and opinion leading to the production of consensus.

2. BCPC approach

BCPC's output comes from a range of international and national conferences, symposia, workshops, annual reviews, discussion fora and publications. These have been guided by the understanding that.....
"(UK and EU) policy seeks to limit the use of pesticides to the minimum necessary for the effective control of pests, compatible with the protection of human health and the environment."

However, there is no intrinsic merit in securing reductions in pesticide usage *per se*. What are required are reductions in adverse effects of plant protection products that do not compromise the need for effective crop protection.

BCPC will continue to urge the need for considerably greater emphasis on integrated crop/farm management (ICM/IFM) as a tool for using pesticides as little as possible but as much as is necessary. This approach has already underlain and will continue to underpin genuine reductions in pesticide usage as opposed to reductions that result simply from replacement of plant protection products by those used at lower rates of active ingredient.

In addition, BCPC has begun to explore and define the potential of sustainable production systems. While this approach (and the timescale involved) go beyond the scope of this consultation our general conclusions to date have considerable resonance.

Ten positive attributes that define sustainable systems of land management and agricultural production have been identified:

- They are substantially dependent on renewable inputs;
- They are stable over many generations;
- They are non-polluting;
- They are profitable and socially acceptable;
- They conserve functional and aesthetic biodiversity;
- They conserve valued landscapes;
- They maximise resource use efficiency;
- They do not transfer problems elsewhere;
- changes to the system are reversible;
- They are responsive to changing requirements and constraints (e.g. population growth and climate change).

There are ten common themes that define a future agenda in support of the drive towards greater sustainability:

Drivers for scientific research:

- Reduced reliance on fossil fuels;
- Effective nutrient recycling;
- Effective pest, disease and weed management less reliant on synthetic chemistry;
- Exploitation and conservation of biodiversity;
- Genetic improvement of crops for resource use efficiency;
- Practices to conserve heritage and natural resources;
- minimisation of diffuse pollution;
- Non-food uses of crops (“crops as factories”).

Other drivers:

- Adequately skilled and knowledgeable workforce;
- Affordability of solutions.

3. General comments

The primary factors shaping agriculture are economics and economics! Economically sustainable (i.e. profitable) agriculture is an essential prerequisite for any future policy to be successful. The lack of any economic dimension in this communication is a major shortcoming that will seriously undermine the proposal as it stands.

The principal drivers for change are technology, legislation and public opinion. Except that they constitute a tiny minority of the public, farmers and growers presently have a negligible voice in the management of change in their own industry. There are two major considerations arising from this:

- The transfer of both technology and knowledge will remain a hugely important challenge. The delivery of the proposals requires a high level of decision making and general management skills.
- Farmer support will be essential.

The principal of product substitution must be underlain by a truly comprehensive comparative risk assessment which incorporates due consideration of IPM systems, resistance management and cost/benefits for producers and consumers as well as the “externalities” associated with widescale use of plant production products. While the use of laboratory data will be useful in a preliminary screening exercise, the ultimate decision must rest on data generated at the field level.

We believe that biotechnology can become an integral part of future strategies for crop protection where it can be demonstrated to confer benefits in environmental impact, human health risks or resistance management.

Given that there is no such thing as a typical farmer, a typical farm or even a typical field, the level difference and of complexity across existing and potential member states will remain a potent barrier to success.

Resolution must be based on local best practice allowed within general guidelines rather than imposed imperatives.

In view of the above general comments the intention to develop the thematic strategy specifying the proposed measures in the course of 2003 for presentation for approval to Council and Parliament at the beginning of 2004 is seen as extremely ambitious.

4. BCPC contribution

A major strength of BCPC is our ability to involve an extremely wide range of organisations from academia, industry, government and non-government organisations in contributing to solutions in this area. Such approaches are no longer confined to the UK – many parts of our organisation have strong working links with groups based in actual or potential member states.

We look forward to playing an active role in the development and implementation of the proposals in particular by organising workshops as stand-alone events or as part of our annual international conference.

Disclaimer

BCPC endeavours to provide a balanced view on all issues associated with crop protection. However, to prevent conflict of interest, members of the BCPC Board of Management and Working Groups who have direct responsibility to the UK Government have not been asked to contribute, as individuals or on behalf of their organisations, to the preparation of this particular communication. They will, however, receive a copy of the final version.

Appendix - THE BRITISH CROP PROTECTION COUNCIL

BCPC brings together a wide range of organisations interested in the improvement of crop protection.

The 43 members of its Board of Management represent the interests of Government departments, the agrochemical industry, farmers' organisations, the advisory services and independent consultants, distributors, the research councils, agricultural engineers, environment interests, consumer opinion, training and overseas development.

In addition a far wider range of organisations contribute to the work programmes of expert Working Groups. These currently include WGs focused on Weeds, Pests & Diseases, Applications, Seed Technology, Minor Uses and Sustainable Production Systems.

The corporate members of BCPC currently are:

- Agricultural Engineers Association
- Association of Applied Biologists
- Association of Independent Crop Consultants
- Biotechnology and Biological Sciences Research Council
- Crop Protection Association
- British Institute of Agricultural Consultants
- British Society for Plant Pathology
- British Society of Plant Breeders
- Campden & Chorleywood Food Research Association
- Department for International Development
- Department of Agriculture and Rural Development – Northern Ireland
- Department for Environment, Food and Rural Affairs represented by Pesticides Safety Directorate.
- Environment Agency
- Imperial College, London
- Lantra
- National Association of Agricultural Contractors
- National Farmers' Union
- National Consumer Federation
- National Institute of Agricultural Botany
- Natural Environment Research Council
- Scottish Executive Rural Affairs Department
- Society of Chemical Industry - Crop Protection Group
- The Environment Agency
- United Kingdom Agricultural Supply Trade Association

Representatives of these Corporate Members, together with a small number of Individual Members elected by the Representatives of the Corporate Members, comprise the Board of Management.

British Crop Protection Enterprises is a wholly owned subsidiary of BCPC which, on behalf of BCPC, organises events and publishes a wide range of information in both electronic and hard copy format.

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