

Direct telephone numbers for

Deirdre Webb 0207495 9144

UKASTA View on the Thematic Strategy On the Sustainable Use of Pesticides.

On behalf of UKASTA I would like to thank Mrs Day for the opportunity to comment on the Thematic Strategy on The Sustainable Use of Pesticides. UKASTA represents about 300 agricultural merchants and co-operatives who sell inputs such as feed, seed, fertilisers and agrochemicals to farmers and market arable crops on their behalf. UKASTA members' extensive involvement across both the livestock and arable sectors makes them keenly aware of the needs of both the farmer and the consumer. Our members are unique in that they have both the producer and first processor as their customers. UKASTA members are committed to working with other sections of the food chain to ensure best practice both on farm and within their own working environments.

General comments: These comments are based on the views of BASIS qualified and experienced agronomists working in the main arable and fresh produce areas of the UK. UKASTA asks that the progress made in the minimisation of the environmental impact of modern intensive farming be adequately recognised. Technological advances in usage reduction, resistant varieties, changes in the knowledge level of growers and severe price pressure have changed the crop husbandry practices in the UK. CAP reform, enlargement and increased competition from imports have changed the future economic landscape and viability of all within the industry. The applications of pesticides are now determined by quality criteria and price signals. Targeted use and lower rates are the norm as growers and agronomists seek to minimise costs and comply with environmental targets enshrined in assurance schemes. The prudent use and choice of chemicals is now of paramount importance in the UK crop protection industry. We ask that economic performance and innovation not be sacrificed in the drive for environmental decoupling when the environmental arguments are not always based on complete knowledge.¹

A healthy and balanced system of farming is essential to supply the needs of the modern consumer and is the objective of all within the crop protection industry.

We support the principle objectives of the strategy as laid out by the Thematic Strategy:

1) To minimize the hazards and risks to health and environment from the use of pesticides.

We would ask that the thematic strategy take into account the other directives being amended and prepared at the moment. Continued piecemeal ratcheting of standards does not allow for planned use of resources or a sustainable agricultural industry. It is worth noting at this point that Directive 91/414 EC provides for a high standard of protection and in particular that environmental protection now takes priority over the objective of improving plant protection. Indeed the essential use programme itself has only allowed extensions of use for products that are known to be of no concern or on a high priority risk list. In addition 91/414 will provide for the substitution when placing PPP on the marketplace.² The loss of many active ingredients and the implications for increased resistance have not been fully realised yet. It is important that sufficient flexibility is provided within the various pieces of legislation to ensure professional choices can be made based on weather risk and efficacy.

In addition the Water Framework Directive (WFD) will have far reaching consequences for diffuse pollution and ground water standards. We would ask that the Thematic Strategy take these Environmental Quality Standards fully into account when finalising its framework of proposals.

2) Improved controls on the use and distribution of pesticides.

We strongly recommend the establishment of an equitable and transparent system to control the use and distribution of pesticides within the EU. The UK already has a comprehensive package of measures to control the storage sale and advise within the agricultural sector. We would ask that this be promoted to all users of pesticides including the amenity and environmental agencies.

Through the Voluntary Initiative we are promoting the continued professional training of spray operators, agronomists and farmers. In addition the technical inspection of spray equipment is being promoted this year. Changing awareness and improving the knowledge level of users about the products they are using will contribute to responsible use of pesticides. We do not recommend an increase in the level of record keeping as this will increase costs and we fail to see how this, might encourage best practice.

3) Encouraging the use of low input or pesticide free cultivation , promoting the use of codes of good practice.

IPM and ICM criteria feature heavily in the recommendations of BASIS qualified agronomists. UKASTA supports the harmonisation of IPM/ICM criteria within the EU. We do not favour the support of “pesticide free” farming to the detriment of ICM / IPM. Better and more robust rotations are the corner stone of efficient commercial farming not just organic systems. So often we hear the “organic lobby” decry the enforced rotation criteria in their codes of practice. Good farming practice is also based on these principles. We actively encourage wide and varied rotations to growers despite the linkage of subsidies to maximum production.³ In the UK we actively promote the LEAF farm audits and strongly recommend them as a blue print for future discussions on ICM.⁴ We support the integration of environmental criteria into new and existing funding programmes and continue to build the environmental criteria into our Assurance schemes.

4) Indicators:

We would recommend that indicators be based on sensible criteria and sound methods for measuring improvements. The indicators should be risk based we do not accept the number of passes across a field is an equitable and sensible measure of reduced risk. Roots crops and vegetables in general require more passes than proteins and therefore the growing of roots crops would be discriminated against. It is in this field that we would strongly ask for a pragmatic approach to choosing a system of monitoring and recording. UKASTA would strongly recommend that reference is made to the WFD and new MRL limits being set by the commission at present. We would be strongly in favour of a simplified EU wide food residue testing framework. It should be transparent and available to all importers and processors.

Finally we would echo Dr C. Wise’s comments on the lack of cost benefit analysis of the strategy. The strategy should incorporate practical advice and guidance from those sectors on whom much of the burden of implementation will fall. The market place is now global in nature and the industry is increasingly faced with competition from global players all producing food with different cost bases and to different standards. UKASTA would ask that the commission does not further burden the industry with systems and regulations that will result in more imports being sucked into the EU because of “invisible taxes”

References

- 1 Analysis of Agricultural Policy in relation to the use of PPPs (Aug 1996)
2. EC Directive 91/414 Concerning the marketing and use of PPPs
3. Influence of Cultivation Practices on Arable Crop Pests, Disease and Weeds. Jordan V.W 1996
4. Linking Environment And Farming (LEAF). www.leafuk.org