



Promoting the Science and Practice of Sustainable Crop Production

20 October 2012

Kerry Hutchinson
National Action Plan Consultation
Room 214
Chemicals Regulation Directorate
Kings Pool
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Dear Mr Hutchinson

BCPC Response to Defra Consultation on the draft UK National Action Plan for Pesticides

BCPC is pleased to have the opportunity to comment on the draft National Action Plan for pesticides.

BCPC welcomes the balanced and pragmatic approach, particularly that there is

- A focus on protection of water, on improvement of amenity and amateur usage, and on integrated approaches, especially with reduced availability of pesticides.
- No intention to aim for pesticide use reduction *per se*, since this does not correlate directly with reduction of risk – but instead continued monitoring of sales and usage data, and of residues in relation to MRLs.
- No proliferation of indicators;
- Continuation of the stance to reduce the regulatory burden on business and reducing costs of Government activities.
- Application training;
- Continuation of the existing regulatory framework.
- Financial incentives and programmes for good practice, e.g. the Catchment Sensitive Farming programme.

BCPC does, however, have concerns about some aspects of the draft National Action Plan.

The UK's approach to operator training, which combines mandatory training and subsequent continuing professional development (CPD), has been highly successful in raising standards and reducing risks. CPD is not required by the draft NAP but will be necessary to maintain these standards in the current rapidly changing technological and regulatory environment.

Some amenity applications are potentially high risk and are often very visible to the public, but this sector is not in general dealt with well. For example, there is nothing comparable to the crop assurance schemes that could drive an inspection regime for sprayers used for amenity applications. More generally, the testing interval specified in the Sustainable Use Directive (six years) is too long for sprayers used in some high risk situations.



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While monitoring residues in relation to MRLs will be useful, care must always be taken in presenting such results to make clear the purpose and significance of the internationally agreed MRLs. Too often, the presence of any detectable residue is misrepresented in the media as “a danger to health”.

Reference is made to the suite of UK pesticide indicators. BCPC is concerned that due caution is used when applying some of these indicators. For example, the Pesticide Forum Indicators Group uses the Farmland Birds Index in recognition that there may be indirect effects from pesticides, but many other factors may have much greater effects on this index, including changes in land use and the balance between winter and spring cropping. Other wildlife indices are being developed and these may be more suitable in the future.

Yours sincerely

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(by e-mail)

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