



# Consultation Response

## **CONSULTATION ON THE REVISED NATIONAL ACTION PLAN FOR THE SUSTAINABLE USE OF PESTICIDES (PLANT PROTECTION PRODUCTS)**

### **Defra Consultation**

Date: 26<sup>th</sup> February 2021

The CLA is the membership organisation for owners of land, property and businesses in rural England and Wales. We help safeguard the interests of landowners, and those with an economic, social and environmental interest in rural land. Our members own or manage around half the rural land in England and Wales and more than 250 different types of businesses.

### **Consultation background**

Scope- England, Scotland, Wales and NI

Response deadline: 26<sup>th</sup> Feb

The review of the existing 2013 National Action Plan (NAP) for the Sustainable Use of Pesticides is a statutory requirement and a commitment under the 25 year environment plan.

The UK governments have produced a revised draft NAP, which aims to increase the uptake of Integrated Pest Management (IPM) and sustainable crop protection in line with the devolved nations' targets on biodiversity and net zero. The plan contains key goals supported by the devolved administrations who will encourage the users of all pesticides over the next 5 years to develop more sustainable methods of crop protection, amenity management and garden pest control.

Wherever possible, governments across the UK want to encourage sustainable pest management that enhances UK biodiversity. The high level aim of the NAP is to 'minimise the risks and impact of pesticides to human health and the environment, while ensuring pests and pesticide resistance are managed effectively.'

The draft NAP covers all of the UK and the consultation response deadline is 26<sup>th</sup> February.

### **General overview of the CLA position**

The CLA is supportive of the high-level aim of the plan and the 5 key goals. The CLA is an advocate of IPM and supports the appropriate and responsible use of pesticides, working with the Voluntary Initiative. The revised NAP reflects the aspirations of the Voluntary Initiative and CLA members in its goals. However, there are some important issues to be considered, as outlined in our response to the questions below.

The CLA would like to see the Voluntary Initiative, which is an established and effective industry group, be a core part of the delivery of the NAP and while this is reflected in the text, we would like to see it strengthened across the plan.

## Consultation questions

### *Questions on Goal 1 (Better regulation)*

**Question 1** – In the context of maintaining current high levels of protection for human health and the environment, what can we do to make the regulatory system for pesticides simpler and more efficient?

The existing UK regulatory framework for Plant Protection Products (PPPs) is already robust and based on the precautionary principle. Any simplifications must not be at the expense of confidence in the safety of pesticides for the consumer.

**Question 2** - What could we do to increase transparency about the way that evidence is used to inform decisions on the regulation of pesticides?

Decisions on the regulation of pesticides should be accompanied by an evidence statement that sets out the information and evidence used and how it was used to arrive at the final decision. This will be of value to regulators, farmers and consumers to improve understanding behind the decisions and avoid risk of misinformation. This evidence should be widely available and would instil confidence in the regulatory decision making.

**Question 3** - How can we best ensure that our regulatory systems keep up with innovation and scientific development including new technologies?

There should be a regular review of emerging technology and early discussions involving all stakeholder groups to identify key issues and regulatory gaps. A new HSE/CRD research group has been established to review development in PPP application technology, such as low drift nozzles, drones and other techniques.

There needs to be a clear process for assessing new technologies – including pesticides, application techniques or other developments – that sets out staged evidence requirements and a clear timetable for decisions. The process should allow for rapid assessment of risk, to allow fast-tracking of low risk innovation.

**Question 4** - What actions could we take to expand and improve the current Biopesticides Scheme, to increase the availability of approved biopesticide products and better support potential users?

Biopesticides present their own risks and users need to be assured of their effectiveness and whether they pose a risk to human health and the environment. The current risk assessment of biopesticides is the same as for other chemicals and this should continue to ensure confidence in the products for farmers and consumers. However, the costs of approval can be a barrier to

innovation and increased bio pesticide availability. Different approval routes for low risk products could be considered.

**Question 5** - What are the priorities for research to better understand the impacts of changes in regulation?

No comments.

**Question 6** – What other suggestions do you have for improvements to the regulatory system for pesticides?

We support the areas identified by the Voluntary Initiative stakeholders:

- Pesticide authorisations and withdrawals:
  - Uniform data package requirements to streamline authorisations and avoid delays in approvals.
  - Imported products should be subject to the same pesticide authorisation.
  - Withdrawal of products should take into account availability and impacts of alternative control measures, and should include consideration of limited use.
- Recognition of low impact chemistry:
  - Include mechanisms to enable fast-track innovation where risks are low.

*Questions on Goal 2 (Promote IPM)*

**Question 7** - How can we best develop and support management and advisory services to deliver an increase in the uptake of IPM?

Many IPM approaches, such as crop rotation, are widely acknowledged to be good practice and were adopted well before the wider concept of IPM was developed. Many IPM actions are commonly practised, but are not necessarily recognised as IPM.

Management and advisory services have a key role to play in the widespread use of IPM techniques. Over 95% arable farmers have Red Tractor assurance, which requires advisors on pesticides to be BASIS registered. Many farmers have undertaken BASIS training themselves. This provides a baseline for appropriate advice on crop protection, which will take into account alternative options and conditions before using plant protection products.

There is a need to build awareness across the advisory sector of the IPM tools, including the new IPM Plan, which now provides a baseline IPM score on an annual basis to measure farm progress.

Government advisory services could be deployed to promote IPM, for example the Farming Advice Service in England, Farming Connect in Wales, or Natural England's Catchment Sensitive Farming Officers.

**Question 8** – What else could we do to ensure that pesticide users are fully informed about the benefits and practicalities of IPM approaches?

Many of the requirements of IPM – planning rotations, selection of suitable varieties, cultivations, and using pest thresholds (where available) are routinely used in decision-making, even if IPM is not clearly credited.

Feedback from CLA members indicated that farmers and growers should be a key target for information and advice on IPM, which will equip them to challenge and better understand agronomist recommendations. Agronomists tend to be risk averse and may not have time to assess IPM thresholds, which can require the daily monitoring of crops. It is also important to reach not only the purchaser of the plant protection products, but also the day-to-day farm manager and spray operators. This latter group could be reached through inclusion in CPD for BASIS and NRoSO.

Promoting the use and understanding of IPM requires multiple areas of action and the government can support this in a number of ways:

- The definition of IPM should include economic use of control measures – this is an important part in the acceptability of IPM. IPM requirements need to reflect local conditions and cropping patterns which can be different across farming systems and practices.
- Development and promotion of tools to support learning and use of IPM. In particular the new IPM plan that provides a baseline IPM score, to allow year on year progress to be measured.
- Co-ordinated promotion through a range of networks, events and peer to peer learning including AHDB Monitor Farms and local discussion groups. The Voluntary Initiative Champions group is a useful resource for speaking at local meetings.
- Co-ordination and funding for national campaigns:
  - The Voluntary Initiative industry group is well placed to co-ordinate and disseminate IPM advice through a wide range routes including print (e.g. magazine articles), presentations at meetings (e.g. Voluntary Initiative Champions), and social media.
- Development of IPM training for farmers, and funding for IPM training, for example:
  - BASIS Certificate in Crop Protection which covers IPM in a range of crops.
  - BASIS Certificate in Advanced IPM and Crop protection.

**Question 9** – How can the promotion of recognised standards be used to encourage the uptake of IPM, in amenity, agriculture and more widely?

Training standards are a valuable tool for increasing understanding and use of IPM. For example, practical aspects of IPM are being updated as part of the NRoSO training programme and a major module for the 2021/22 training is on IPM for spray operators.

Standards and assurance schemes that include principles of IPM such as Red Tractor and LEAF can be valuable in promoting the use of IPM. In a similar way, many buyer standards (e.g. supermarkets or processors) require the use of IPM in their standards. The increased adoption of sustainability tools such as the iSage tool for livestock or ORC public goods tool, also presents an opportunity for promoting the use of IPM.

**Question 10** – What suggestions do you have for a communications campaign to encourage more uptake of IPM?

- Co-ordinated programme involving all industry groups:
  - This could be based on the Voluntary Initiative group, which already has wide industry representation.
- Collateral that is clearly presented and engaging.
- The programme should involve a range of activities at appropriate times of year, similar to that set out in the response to question 8.
- The value of IPM in demonstrating responsible pesticide use by farmers is a key message.

**Question 11** – How could we use financial support schemes to offset risks associated with IPM?

George Eustice has frequently mentioned the use of IPM as one of the actions that will be supported through the new Environmental Land Management scheme, and the CLA supports this principle. The value of the IPM approach goes beyond reducing pesticide use: it has benefits to soil health, water quality and carbon mitigation. However, IPM takes more management time and carries higher risks, so incentives that offset these costs would promote awareness and adoption of IPM approaches.

IPM practices could also be supported through capital grant funding for purchase of new equipment for precision applications and closed transfer systems, and for improvements of handling facilities, such as biobeds.

**Question 12** – What should government do to facilitate research on the availability of effective methods of pest control?

The government should co-ordinate a review of IPM research to identify key evidence gaps, for example pest thresholds or efficacy of various alternative pest control methods.

**Question 13** – What other suggestions would you make to improve uptake of IPM approaches?

No comments.

*Questions on Goal 3 (Safe & responsible use of pesticides)*

**Question 14** – How should we raise awareness of the health, environmental and legal risks of using professional products without having the correct training and certification?

There have been great improvements in tackling safe and responsible use of pesticides over a number of years, driven by regulation and voluntary industry activity. For example, the National Register of Spray Operators (NRoSO) was established in 2001 by the Voluntary Initiative and requires registration and annual CPD training. The Voluntary Initiative also introduced the National Spray Testing Scheme, ahead of it becoming a legal requirement via the Sustainable Use Directive

Risk labelling on products could raise awareness of the risks of using products without certification. There may be a role for retailers, who are obligated to check the purchaser has had

suitable training and hold certification. The retailer could signpost unqualified customers to accredited training schemes. There is a concern the online selling of products is not sufficiently well policed and the regulatory requirements are not enforced.

**Question 15** – What would be the benefits and challenges of introducing a legal requirement for certification of pesticide advisors?

Although the legislation does not require advisers to hold a certificate, in practice farm assurance schemes require all PPP advisors to be members of the BASIS professional register, which requires both training and certification.

**Question 16** – What more should retailers be doing to inform amateur pesticide users about the actions they can take to control pests more sustainably?

No comments.

**Question 17** – How can we best target inspection and enforcement to prevent unsafe and environmentally damaging pest management practices?

No comments.

**Question 18** – What kinds of challenges need to be addressed in order to ensure safe disposal of unused pesticides and pesticide containers?

Local chemical amnesties are popular; however, a national programme of amnesties should be coordinated to ensure the comprehensive disposal of banned chemicals.

When particular products are withdrawn, early notification is essential to avoid the disposal challenges created when products are withdrawn at short notice.

**Question 19** – How can we best make sure that members of the public know what to do when pesticide products are withdrawn from sale?

No comments.

**Question 20** – What further actions are needed to ensure that equipment used for application of pesticides complies with safety requirements?

There is already legislation that requires sprayer testing and is well established. The testing regime for agricultural vehicles is delivered through the National Sprayer Testing Scheme, which is a requirement for many farm assurance schemes.

**Question 21** – What else should we do to ensure that pesticides are used safely and responsibly?

No comments.

*Questions on Goal 4 (Targets, metrics and indicators)*

**Question 22** – What are the priorities for data collection and research on pesticide usage?

No comments.

**Question 23** – What are the priorities for research on the environmental impact of pesticides?

No comments.

**Question 24** – What are the priorities for research on the health impacts of pesticides?

No comments.

**Question 25** – What suggestions do you have for ways of measuring our progress against the goals set out in this NAP?

No comments.

*Questions on Goal 5 (Delivery of the NAP)*

**Question 26** – How can we best bring together stakeholders with diverse interests to support delivery of the NAP, working towards a common goal of sustainable pest management?

The Voluntary Initiative has a role to play in the bringing together a wide range of stakeholders from both the agriculture and amenity sectors.

Educating stakeholders will be key in driving the uptake of sustainable pest management.

**Question 27** – Considering the NAP as a whole, what other comments and suggestions would you like to make in addition to those covered by previous questions?

There is a real willingness within the farming industry to reduce the environmental impact of plant protection products and to use a range of approaches to deliver effective pest management in the production of sustainable food.

A specific issue with the coverage of IPM in the revised NAP is the definition, which on the face of it is reasonable, but has shifted some way from the original definition which included an economic element. The economic aspect of IPM is an important consideration alongside the environmental aspect and the definition should reflect this.

IPM also needs to encompass the whole continuum of farming methods, from organic to conventional. Measuring the uptake and impact of IPM is likely to present a challenge. Those that farm in the UK do so across a wide variety of physical conditions and therefore implementing IPM will require a variety of approaches on the ground. The application of rigid standards is not feasible, and a more appropriate means of implementation of IPM should reflect regional and sectoral differences.

There is a concern that the presentation of IPM in figure 1 in the consultation document, is misleading, as the pyramid diagram gives the impression that chemical control is used as a last resort; in reality chemicals are used as one of a number of different solutions.

There is a requirement for better public understanding of pesticide use in farming, particularly with regards to business economics. The cost: benefit of pesticide use is an important factor in decision making.

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