29th December 2012

Web: http://www.aab.org.uk/

http://www.nfuonline.com/

Dear David Heath,

Re: UK National Action Plan for pesticides and implementation of the Sustainable Use Directive 2009/128/EC (SUD)

As you are aware the UK is required to implement the Directive 2009/128/EC and the Government is about to release the National Action Plan for the UK. The Directive sets out to reduce "risks and impacts of pesticide use on human health and environment" and to promote "the use of integrated pest management (IPM) and of alternative approaches".

Defra have pointed out that UK standards for the protection of human health and the environment are already among the highest in the EU. However, there are two parts to the SUD: not only do risks need to be reduced but there is also an obligation to promote the use of alternatives[1]. Farmers need to be supported by more practical R&D that will provide them with workable alternative crop protection techniques and by knowledge transfer to provide appropriate information. **In order for successful promotion, establishment and support for IPM, two things are vital:**

1. **Research and development of alternative approaches to crop protection**
2. **Knowledge exchange and transfer to growers and agronomists**

Farmers currently use pesticides as the mainstay of their crop protection because they provide a straightforward and effective way of reducing harvest losses to pests, weeds and diseases. Reducing the availability of certain pesticides before alternative crop protection methods have been implemented would mean an increase in the use of the remaining pesticides. This would cause increased and intense selection pressure for pests, diseases

[1] ARTICLE 14 Member States must:
"take all necessary measures to promote low pesticide-input pest management, giving, wherever possible, priority to non-chemical methods"
"establish, or support the establishment of, necessary conditions for the implementation of integrated pest management"

and weeds to evolve resistance. Loss of control to resistance would make UK agriculture increasingly vulnerable to significant yield losses.

2012 has been the worst year on record for Fusarium and Septoria diseases in the UK and farmers have been experiencing serious difficulties with control of blackgrass weed. It appears that the UK will become a net importer of wheat for the first time in 10 years. Therefore reducing yield and quality losses is needed to ensure food security.

Defra has been reducing R&D on alternatives to pesticides since 2005. The draft national plan document we were asked to comment on in the consultation period is not well connected to the food security context, and as such would appear to be out of touch with the seriousness of the problems facing UK and European agriculture.

Placed in the context of increasing global demand for food and current concern about food security there are serious consequences of leaving EU agriculture vulnerable to pests, diseases and weeds. It has been estimated that without crop protection the cost of food in the UK would rise by about 40%, an additional expenditure by households of £70 billion per year[2]. If the productivity of EU agriculture declined and yields became more unstable because of insufficient crop protection there would be a number of undesirable consequences. These not only include rising food prices but also impacts on human health as foods such as fruit and vegetables become more expensive, health hazards from mycotoxin contamination, food production companies being driven out of Europe to countries where costs are less, more land being used for agriculture to compensate for lower productivity and increasing greenhouse gas emissions as agriculture becomes less efficient.

We recommend that a greater investment is made in R&D and knowledge exchange and transfer to support implementation of the SUD.

Yours sincerely,

Prof Toby Bruce

Association of Applied Biologists

Peter Kendall

President of the NFU

[2] Rickard, S., 2010. The Value of Crop Protection. CPA report