

The Pesticide Collaboration - NAP Red Lines



Introduction:

The Pesticide Collaboration – hosted by PAN UK and the RSPB – is a coalition of environmental and health groups, academics, farming networks, trade unions and consumer rights organisations working under a shared vision to urgently reduce pesticide-related harms in the UK.

This document sets out The Pesticide Collaboration's views on [the draft National Action Plan on the Sustainable Use of Pesticides](#), and sets out our key red lines on what we expect to see in the final version that is due to be published in the first half of 2023.

What's our definition of a red line?

A red line is something that in The Pesticide Collaboration's view would be unacceptable if omitted from the NAP, and would represent either a backwards step or failure to make progress in key areas when it comes to pesticide regulation. The final NAP should build on the 2020 draft and respond to the submissions from civil society and experts. This document sets out the minimum standards we expect from the plan that has taken over 5 years to publish.

These will be key points The Pesticide Collaboration will focus on in our work around the NAP, including media and press work, mobilisation, and follow-up advocacy.

Summary of our key red lines:

The NAP must:

- 1) maintain the UK's 'hazard-based' approach to pesticide regulation and continue the commitment to the precautionary principle
- 2) include commitments to increasing the uptake of Integrated Pest Management (IPM)
- 3) commit to breaking the link between farm advice and pesticide profits
- 4) include a commitment to reducing pesticide use, through the introduction of clear reduction targets for both usage and toxicity

- 5) commit to a phase out of pesticide use in urban areas
- 6) commit to ending emergency authorisations of banned pesticides

Red lines in more detail:

1. The NAP must maintain the UK's 'hazard-based' approach to pesticide regulation and continue the commitment to the precautionary principle

Why is this important?

The UK – along with the EU – currently follows a version of the hazard-based approach to pesticide regulation. This follows the principle that if an active substance possesses intrinsically hazardous characteristics – for instance by being able to cause cancer or persistent pollution – then it is simply considered too dangerous to be used safely and should not be authorised. This approach is in line with the precautionary principle which states that “when an activity raises threats of harm to human health or the environment, precautionary measures should be taken even if some cause-and-effect relationships are not fully established scientifically”.¹ The NAP must include a commitment to retain a hazard-based approach and continue to follow the precautionary principle, which theoretically underpins all current UK decision-making on pesticides.

What the NAP should include:

- In the draft NAP it said: “We will continue to be led by the best available scientific knowledge to develop our regulatory system while also continuing to follow the precautionary principle where there is uncertainty over levels of risk”. This should remain in the final draft. This would be a major red line for The Pesticide Collaboration - a move towards a 'risk-based' approach (which is based on the belief that risks associated with pesticides can be effectively managed) would be an unacceptable backwards step. The precautionary principle must remain central to the governing of pesticides.

2. The NAP must include commitments to increasing the uptake of Integrated Pest Management (IPM)

Why is this important?

We know the Government wants to support uptake of IPM – and the simple fact that an IPM standard is included in the first batch of standards within the Sustainable Farming Incentive (SFI) to be rolled out is important. The Government's 25 Year Environment Plan committed to: “Putting Integrated Pest Management (IPM) at the heart of a holistic approach, by developing and implementing policies that encourage and support sustainable crop protection with the minimum use of pesticides”. The 2023 Environmental Improvement Plan committed to “minimise the risks and impacts of pesticides to human health and the environment through the greater uptake of IPM across all sectors and the development and introduction of alternative

¹ A. Wallace. Hayes (June 2005). The Precautionary Principle

approaches or techniques, to reduce reliance on the use of conventional chemical pesticides.”² However, without the right support in place to help farmers and other land managers to adopt genuine IPM then uptake will remain low. We therefore expect the NAP to outline what this support will look like as well as include overall commitments to increasing uptake of IPM as a means to reduce the risk to people and the environment from pesticides.

What the NAP should include:

- Goal 2 of the draft includes: “New sustainable farming schemes across the four countries of the UK will seek to incorporate IPM principles so that farmers and land managers are supported to take a sustainable approach to managing pests.” Although the fact that an IPM standard has been prioritised in the roll out of the Sustainable Farming Incentive (SFI) is very welcome, the detail that Defra announced in January 2023 means that it is not clear how farmers will be incentivised to undertake a full suite of effective IPM actions. What is proposed is effectively a pick’n’mix situation, whereby a farmer could simply do the IPM plan action, without any of the practical actions. Therefore, it is not clear how the planning element will avoid being a ‘tick-box’ exercise, without any changes being made on farms, and therefore no discernible impact on pesticide use. Ideally, we would have seen the packaging up of actions together, to make faster progress on increasing uptake of genuine IPM. For example, farmers having to pick a number of practical actions in addition to the IPM plan. The NAP should build on this and provide more certainty and support for farmers to implement IPM.
- At a minimum, the NAP should add a condition to the IPM standard that requires follow up to IPM plans by asking farmers to show evidence of noticeable changes to make sure that IPM plans are actually acted upon. While this will ensure that practical actions are taken by farmers to implement their IPM plans, it will avoid being prescriptive in terms of what those actions are.
- The NAP should set out the idea that the basic IPM actions in the SFI standard should, over time, become the new regulatory baseline so that farmers are able to progress to a higher level of outcomes, with support, and reflecting an increase of ambition over time to reduce pesticide impact.
- IPM uptake must go beyond the SFI, considering the fact that the NAP covers the whole of the UK and the SFI only covers England and only farmers who join this scheme. The NAP should ensure that IPM is implemented across the board and not just by farmers: it should also be a key tool for other land managers, foresters, council workers, and commercial growers.
- The NAP should also address the importance of providing IPM training, crop-specific guidance, tools and skills development for farmers and beyond, in order to address these skills and knowledge gaps, through courses, toolkits, and peer-peer knowledge exchange.

3. The NAP must commit to breaking the link between farm advice and pesticide profits

² EIP Goal 4 (page 126 -141)

Why is this important?

The NAP must recognise the importance of increasing transparency and independence from industry when it comes to pesticides. For example, the NAP must commit to breaking the link between farm advice and pesticide profits and commit to making agronomic advice independent of pesticide sales available to farmers. The NAP must provide assurance that any regulatory enforcement system will be created independently from the industry it seeks to regulate.

What the NAP should include:

- It is good that Goal 2 of the draft mentions that the lack of independence of agronomists being a problem is mentioned, but their solution is to work with the pesticide industry is inappropriate: “Commercial or distributor agronomists provide a service with income derived from the sale of products, often associated with specific manufacturers. It is important that farmers receive unbiased advice about IPM and the whole range of crop protection products available to them. We will review the evidence on the extent to which impartiality has an effect on the advice that farmers receive and will support industry to develop its advisory model to better support the uptake of IPM.”
- Goal 3 in the draft says: “HSE have recruited several new dedicated Pesticides Enforcement Officers, who will be responsible for conducting inspections across Great Britain. We will work with industry over the next 12 months to develop our system of enforcement”. This should be independent – for example led by the OEP - rather than be self-regulated by the industry.
- We also want the NAP to include:
 - A commitment to introduce new pre-approval tests for short and long-term effects on honeybees, wild bees, butterflies, hoverflies and ground beetles.
 - A commitment to apply the same regulatory safety standards to co-formulants as are applied to active ingredients.
 - A commitment, prior to a decision to approve or refuse any application for a new active ingredient, use or derogation, to produce a summary report of the submitted data and all relevant published evidence with clear advice on whether the approval criteria have been satisfied. The report must be written by independent (not Government or industry) scientists and must be subject to a public consultation.
 - A set of guidance principles that agronomists should follow when providing advice on pesticides, which must fit within an IPM framework

4. The NAP must include a commitment to reducing pesticide use, through the introduction of clear reduction targets for both usage and toxicity

Why is this important?

It is vital that the UK reduces the amount of pesticides being used, as well as the related harms to human health and the environment. While the 2013 NAP focussed on making existing levels

of pesticide use more sustainable, the 2020 draft NAP committed to driving a reduction in use via targets.

The UK has committed to "reducing the overall risk from pesticides and highly hazardous chemicals by at least half" in the Kunming-Montreal Global Biodiversity Framework agreed at COP15. This should now be reflected in national policy, and domestic pesticide regulation must go further than this and use the words 'use' and 'toxicity' instead of risk. 'Risk' could lead to an unintended shift away from reduction of use and toxicity, towards a watered-down 'risk mitigation' approach.

Setting measurable targets makes it easier to quantify how pesticide reduction can contribute towards other legally binding targets, such as the species abundance target and net-zero. Setting a clear direction of travel is important to drive innovation, focus attention on safer and more sustainable alternatives, and to provide reassurance to farmers and other pesticide users that they will receive support to enable them to contribute towards meeting reduction targets. To not include a commitment to clear and robust targets in the NAP would be a red line. The Pesticide Collaboration has commissioned [a detailed report](#) on what pesticide reduction targets should look like.

What the NAP should include:

- The NAP should contain clear targets to reduce pesticide use and toxicity by at least half and a timed and quantified target to reduce pesticide use, with a plan to monitor and report on these targets. The Pesticide Collaboration has set out proposals for targets [here](#). In Goal 4 of the draft NAP (page 42) there is a section on environmental indicators. It mentions the Wildlife Incident Investigation Scheme which does not actually represent the widespread and long term impact of chemicals on wildlife. It also puts a lot of reliance on the H4 indicator from the 25 Year Environment Plan (which is England only). This seems to be arguing that the NAP can't contain targets because there is no data, but Defra are not seeking out this data either.
- The draft NAP doesn't reference the post-approvals monitoring work from NE/CEH which was underway before covid. There doesn't seem to be a commitment to improving real-world monitoring of the impacts of pesticides.
- Goal 2 of the draft has a good introduction, particularly the fact that pesticide use reduction is mentioned: "IPM approaches aim to limit dependency on chemical pesticides, **reducing unnecessary use**, risks of adverse impacts of pesticide exposure to people and the environment, and the development of pesticide resistance. By promoting systems where the **need for pesticides is inherently reduced**, the four UK administrations collectively aim to **minimise the negative impacts of pesticides** and, **over time, reduce pesticide use**, in line with the goals of Defra's 25 Year Environment Plan and the ambitions of the Devolved Administrations, including biodiversity and net zero targets." The Environmental Improvement Plan, released in February 2023 reconfirmed the government's commitment to "Tackle chemical pollution at source

through regulatory action, including banning or restricting the most harmful chemicals.”³
The emphasis of use reduction is welcome, and any move towards risk reduction would be disappointing (see red line 1 above).

5. The NAP should commit to a phase out of pesticide use in urban areas

Why is this important?

The phase out of urban and amenity use of pesticides is essential. Many towns and cities around the UK and globally have already ended pesticide use in urban areas. Most urban pesticide use is purely for cosmetic reasons so there is no risk of a knock on effect on food security. The vast majority of urban and amenity pesticides are entirely unnecessary and there are plenty of non-chemical alternatives available. The NAP must therefore commit to a phase out of urban use of pesticides.

What the NAP should include:

The NAP should set out a strategy to phase out pesticide use in urban areas, particularly green spaces, pavements, and around hospitals, schools, and housing estates. This would be a clear recognition of the [harmful impacts of pesticides on human health](#), as well as on the local environment. Local authorities and other land managers should be given the resources and knowledge to use alternatives to pesticides.

6. The NAP should commit to ending ‘emergency’ authorisations of banned pesticides

Why is this important?

In January 2022 and 2023, the government permitted the ‘emergency’ use of the banned pesticide thiamethoxam – a type of neonicotinoid – on sugar beet in England in 2023. These banned pesticides are lethal to wildlife - a single teaspoon of neonicotinoid is enough to deliver a lethal dose to 1.25 billion bees. The Court of Justice of the EU (CJEU) declared that providing emergency derogations for expressly prohibited neonicotinoid-treated seeds is not in line with EU law - the UK should follow this example.

What the NAP should include:

The NAP should set out a path to end the repeated ‘emergency’ authorisations of banned pesticides that have been granted for neonicotinoids in recent years. The emergency authorisation process was not designed for repeated year-on-year authorisations like we’re seeing, so the NAP should commit to action to ensure it isn’t exploited to allow continued use of banned substances. The NAP must also commit to funding research into alternatives for all

³ EIP Goal 4 (page 126 -141)

pesticides that are granted emergency derogations, including the use of neonicotinoids such as thiamethoxam on sugar beet crops.

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